Blue Mountains Biodiversity Project Action Alert: Ragged Ruby DEIS Comments Due December 17th!

Please help us stop extensive logging of large trees and old growth forest, and destruction of watershed integrity and habitat for marten, Threatened Steelhead and Bull trout, Sensitive Columbia Spotted frogs, and more….

Despite past heavy logging in parts of the Ragged Ruby Project area, the area still contains magnificent creeks with critical habitat for Threatened Steelhead and Bull trout, high quality habitat for Sensitive Columbia Spotted frog and Long-toed salamander, and critical riparian corridor and high elevation habitat for American marten, a weasel species ranked as vulnerable in Oregon and especially vulnerable on the Malheur Forest, where the Ragged Ruby timber sale is located.

The vast majority of the so-called "upland restoration activities" planned in Ragged Ruby consist of extensive heavy commercial logging that impairs ecological resiliency and threatens the viability of numerous wildlife species in the area, including Pileated woodpecker, Sensitive Western-ridged and California floater mussels, and possible rare Pacific lamprey. As the DEIS admits in its summary, Ragged Ruby Project watershed, fisheries, and wildlife habitat restoration is limited to 10 acres of aspen restoration (18 stands) and installation of two bat gates in mine entrances for their protection, in the face of 8,210 acres to 9,200 acres of commercial logging (under alternative 3 and the proposed alternative 2 respectively) plus 11.6 to 12.4 miles of "temporary" road construction, 2.9 miles of road opening, and miles of new trail construction from roads into two Inventoried Roadless Areas, plus lots of prescribed burning across the whole area—31,500 acres to 34,000 acres.

Unfortunately there is little significant difference between the two action alternatives, as both incorporate similar extensive logging and burning and way too many threats to watershed integrity through "temporary" road building on hill slopes (usually over creeks) and within Riparian Habitat Conservation Areas, and many stream-crossings. Both alternatives propose Forest Plan amendments to effectively violate Forest Plan standards by commercially logging large Grand and Douglas firs over 21 inches in diameter (dbh); logging in and reducing late and old (old growth) forest stands; and not maintaining existing wildlife connectivity corridors between late and old structure and old growth forest stands.

The scale of logging only differs by 1,000 acres between the two alternatives, although the 1,000 acres that would not be logged in alternative 3 include some of our highest priorities for dropping commercial logging sale units, including dropping management entirely or only doing small tree thinning by hand in never logged or roaded lands, and in occupied or high quality suitable marten habitat. Alternative 3 would also drop commercial logging in dry meadows and lithosol bunchgrass restoration areas. Alt. 3 would exclude bicycle use from several Inventoried Roadless Area trails to minimize potential for bicycles to illegally enter the nearby North Fork John Day Wilderness Area, which we support. Alt. 3 would reduce prescribed burning to minimize impacts to marten habitat, but only by 2,500 acres. There are only slight reductions in the Forest Plan amendment impacts in Alt. 3, including 400 acres less of logging large trees >21" dbh (3,000 acres instead of 3,400 acres, with no apparent size limit for logging Douglas fir and Grand fir, although the Forest Service claims to avoid logging trees over 150 years old by inaccurate visual characteristic guides.) Alt. 3 would commercially log 820 acres of late and old structure stands in the warm/dry forest type, as opposed to 1,010 acres in alt. 2, while both of the action alternatives (1 is No Action) would commercially log 50 acres within multi-layered old forest in the hot/dry forest type. Under both action alternatives, about 120 acres would be "removed" from late and

old structure status. Under alt. 2, only 2,200 acres would be designated as wildlife connectivity corridors, whereas under alt. 3, 3,260 acres of wildlife connectivity corridors would be designated. Apparently in both cases, the wildlife connectivity corridors would be open for logging within the limits of the Eastside Screens, part of the Forest Plan, but both would need a Forest Plan amendment to allow for not connecting all late and old structure and old growth areas, which is important for wildlife dispersal and migration to more suitable habitat as habitat conditions change under climate change.

To make a long story short, alternative 3 is better than alternative 2 as it avoids logging more marten habitat and undeveloped (never logged or roaded) lands, commercially logs 1,000 acres less overall than alt. 2, drops commercial logging in lithosol high desert areas and dry meadows, designates 1,060 acres more as wildlife connectivity corridors, reduces logging of large trees by 400 acres, commercially logs 190 acres less late and old structure forest than alt. 2, and excludes bicycle use from several trails in Inventoried Roadless Areas to prevent illegal bicycle use in the North Fork John Day Wilderness Area.

However, neither alternative is acceptable to us, as both pose serious threats to watershed integrity, critical habitat for Steelhead and Bull trout, and marten habitat, and extensive logging of large trees and logging within late and old structure forest, and both would fail to meet Forest Plan standards for wildlife connectivity corridors. So we need your help to convince the Forest Service that two versions of too much logging do not represent an adequate range of alternatives or an ecologically responsible choice, especially when forest carbon sequestration is vitally needed to slow or reduce extreme climate change.

We are greatly concerned by Ragged Ruby project proposed impacts to watershed integrity, including logging on steep slopes, log hauling on already damaged roads that concentrate overland flow, "temporary" road construction within RHCAs, and many stream crossings with heavy equipment or log trucks, combined with highly detrimentally altered existing watershed conditions. Legacy management impacts and ongoing management impacts have already altered the quantity and timing of surface water runoff, so extensive road use within riparian areas with the Ragged Ruby timber sale would create significant cumulative impacts to watershed conditions that weren't adequately considered in the DEIS.

Proposed impacts to watershed integrity start with recognition of current degraded conditions from past logging, roading, and livestock grazing: *rutting and other conditions that may concentrate overland flow were observed on about 35 of the 140 roads on which log hauling is proposed. "Temporary" roads are proposed for locations on undisturbed hillslopes and on former road templates where natural or passive decommissioning was initiated about 20 years ago. (DEIS p.75) *The proposed activities include installing portions of six "temporary" roads in riparian habitat conservation areas (RHCAs). Log hauling is proposed at about 123 of the nearly 200 stream crossings in the two planning area subwatersheds and at about six locations where seeps or overland flow originating at seeps is present. Minor to major rutting or similar drainage concerns are present at about 17 of the 123 crossings proposed for log hauling. (DEIS p. 76) *"Roading and reduction of channel and valley hyporheic [an area beneath the bed of a river or stream that is saturated with water and supports invertebrate animals which play a role in the larger ecosystem] and floodplain storage have altered the watershed's ability to capture, store, and safely release runoff without alteration in timing or duration. This is characterized primarily by acceleration in rates accompanied by an increase in magnitude, both of which are indicators of elevated watershed hazard." (DEIS p.77)

With extreme climate change already in progress, severe storms are likely to further exacerbate the effects of Ragged Ruby logging, road construction, log haul, and stream crossings have on alterations of surface water runoff, water quality, water quantity, and timing of peak flows. Yet the DEIS fails to analyze these critical cumulative effects from proposed actions plus extreme climate change.

We are also concerned that planning area creeks and streams are already not meeting stream temperature standards and that the intensive management planned for RHCAs in the Ragged Ruby sale would further increase stream temperatures to the detriment of listed fish species, including Bull trout and Steelhead trout. The foreseeable erosion and sedimentation effects of so many (123) stream crossings where log hauling is proposed also threatens water quality essential for critical fish habitat. This sale either needs to be abandoned completely (our preference) or scaled down significantly, in part by removing all logging and roading out of RHCAs and off steep slopes above creeks.

Our concerns regarding Ragged Ruby project impacts to American (Pine) marten habitat and population viability:

The Ragged Ruby area is evidently a stronghold for marten on the Malheur National Forest compared to other parts of the forest. The DEIS establishes that: *Marten occurrence was documented primarily associated with riparian areas or late and old structure stands adjacent to riparian areas (both of which are slated for logging, especially in alternative 2.) *Marten presence in late and old structure forest was documented multiple times in the Ragged Ruby planning area, including females with kits. *Multiple marten observations were documented, particularly in association with the Butte Creek and Ruby Creek drainages, including an adult female with kits (indicating suitable breeding habitat.) Historical documentation of martens also took place in association with Granite Boulder Creek. Logging is proposed around all three of these major creeks. (DEIS pages 187, 188, & 190)

Based on the Bull and Heater (2000) study and the Raphael and Jones (1997) study cited in the DEIS (p.189), marten select for large snags over 20" dbh and averaging 26 to 38" dbh for resting and denning in Eastern Oregon and would therefore be threatened by removal of large firs over 21" dbh, as proposed by both action alternatives. Down wood used as rest and den sites by marten in the Blue Mountains average 26" dbh (Bull and Hunter, 2000), indicating an additional impact to marten viability from logging large trees.

Further impacts to marten populations from planned management actions in the Ragged Ruby sale are well documented in the science: "Reduction in the amount of late-seral forest [such as large and old growth Grand fir and Douglas fir] and associated large snags and logs, and associated fragmentation of habitat are the main reasons marten are considered vulnerable (Hargis et al. 1999, Wisdom et al. 2000)." (DEIS p. 190) "Pine marten populations appear to be sensitive to changes in their environment, particularly a reduction in fuels and forest complexity (Moriarty et al. 2016)." (DEIS p. 190)

A viability assessment completed for the 2014 Blue Mountains Forest Plan Revision indicates concern for the American (Pine) marten on the Malheur National Forest. According to this analysis, compared to historical conditions, habitat abundance has been reduced to "very low" and habitat patches are frequently isolated from other habitat patches (Wales et al. 2011). Densities of large diameter snags greater than 21" dbh have also declined from historical to current levels (Korol et al. 2002, Wisdom et al. 2000).

We are very concerned by the admissions in the DEIS that: "Depending on the size and intensity of fall burns, alternatives 2 or 3 could remove a substantial amount of suitable marten habitat in the planning area." (DEIS p. 198) "Because this planning area contains occupied and extensive suitable habitat for pine martens, the overall direct, indirect, and cumulative effects could result in a negative population trend. Combined with other similar projects, particularly in the Middle Fork John Day River corridor, the loss or alteration of habitat could be significant at the scale of the Forest….Ultimately, not enough information is known about pine marten populations or distribution across the Forest to accurately determine continued viability….localized populations (Middle Fork John Day River corridor martens) could see considerable declines in suitable habitat or populations.

Cumulatively significant loss of snags and down wood for wildlife, carbon sequestration and nutrient cycling in soils: We are very concerned by the high potential cumulative loss of snags and down wood from the Ragged Ruby sale combined with many similar timber sales across the Middle Fork John Day area (e.g. Camp Lick, Magone, Big Mosquito, and Galena) which have recent and over-lapping timelines of logging and road use.

Rare plants at risk in the Ragged Ruby project area: Four rare vascular plant species and one moss species live within the Ragged Ruby planning area: *Buxbaumia piperi* (Bug on a stick), *Eleocharis bolanderi* (Bolander's spikerush), *Lomatium tarantularioides* (Spider biscuitroot), *Pinus albicaulis* (Whitebark pine), and *Pyrola dentatadentate* (Undulating wintergreen.) We are concerned that the Ragged Ruby timber sale may contribute to a trend toward uplisting for the four rare vascular plant species and one rare moss species known to exist in the area due to an admitted lack of thorough plant surveys for this project. The accelerated scale and pace of so-called "restoration" logging being conducted by the Forest Service makes it nearly impossible for thorough current Sensitive and rare plant surveys to take place before DEIS preparation and logging, roading, and burning impact implementation.

We request the following changes to the Ragged Ruby project:

*All logging of large trees =/> 21" dbh needs to be dropped. *All commercial size logging in late and old structure forest must be dropped. *The Ragged Ruby Project needs to fully comply with Forest Plan standards for wildlife connectivity corridors. (Drop all Forest Plan amendments. * We want all suitable marten and active Pileated woodpecker habitat dropped from commercial-size logging and prescribed burning. *Logging should also be dropped in all mature and Late and Old structure cool moist forest (which can be Pileated woodpecker and marten habitat.) *All logging or roading in undeveloped lands must be dropped. *Drop all logging and road construction and most log hauling within RHCA buffers, including stream-crossings. * There should be no prescribed burning or commercial logging in wildlife connectivity corridors, which provide crucial dispersal and climate change migration habitat for many species, including marten, lynx, and Gray wolves. *We are strongly opposed to creating openings (mini-clearcuts) in the Inventoried Roadless Areas, even where there is no removal of felled trees. Inventoried roadless areas are some of the last areas left in an unmanaged state outside of Wilderness Areas and need to be left that way to allow for critical wildlife refugia, headwaters protection of streams, intact blocks of undisturbed habitat for wide-ranging predators (wolves, lynx, fisher, marten), significant carbon sequestration, undisturbed natural ecological processes, and semi-primitive recreation.

*This sale either needs to be abandoned completely (our preference) or scaled down significantly, in part by removing all logging and roading out of RHCAs and off steep slopes above creeks.

Please send in your comments right away, or at least by December 17th!

Mail comments to: Blue Mountain Ranger District, c/o Sasha Fertig, 431 Patterson Bridge Road/ P.O. Box 909, John Day, OR 97845 **Fax to:** (541) 575-3319.

Email comments to: comments-pacificnorthwest-malheur-bluemountain@fs.fed.us

Electronic comments must be submitted as part of the actual email message or as an attachment in .doc, .docx, .rtf, or .pdf. Emails sent to other email addresses, in other formats, or containing viruses will be rejected by the Forest Service.

Include your name, address, telephone number, organization represented (if any) and the title of the document (Ragged Ruby Project Draft Environmental Impact Statement) with written comments.

Thank you for helping us show opposition to the Ragged Ruby Project timber sale.

Please support our ecological protection work with Blue Mountains Biodiversity Project:

Donations can be sent to: Blue Mountains Biodiversity Project, 27803 Williams Lane, Fossil, OR 97830

In-kind donations needed: Lawyer and law student assistance with our potential legal cases; volunteers to field survey proposed timber sales in Eastern Oregon next summer between June 1st and late September (Call (541) 385-9167 & leave a message with your name and phone #); working cameras, binoculars, dbh measuring tapes, and compasses with clinometer functions; food and tea for volunteers.

—