



# Oregon

Theodore R. Kulongoski, Governor

## Department of Fish and Wildlife

John Day Field Office

P.O. Box 9

John Day, OR 97845

(541) 575-1167

FAX (541) 575-0948



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BLM PRINEVILLE  
DISTRICT

Brent Ralston  
Bureau of Land Management  
3050 NE 3<sup>rd</sup> Street  
Prineville, OR 97754

Dear Brent:

We have completed our review of the Little Canyon Mountain Fuel Reduction Project EA, and wish to provide comments that are hopefully sensitive to the project Purpose and Need, while paying particular attention to ecosystem structure and watershed integrity.

Alternatives C, D and F are viable alternatives with some tweaking to incorporate features spread among one another. Alternatives A and B do not provide solutions to the ecological and social issues this project attempts to remedy.

Desirable components of Alternative C include:

- A large buffer area around the pit.
- Thinning of mahogany, as opposed to pruning, and juniper removal.

Those of Alternative D include:

- Relocation of 0.5 miles of road away from Little Pine Creek.
- Reshaping, decommissioning, and obliteration of 5.2 miles of roads and elimination of 20 stream channel crossings.
- Closing the pit to trash dumping from vehicles.
- Release hardwoods in 10 acres on Little Pine Creek.
- Culvert modification or elimination on the creek.
- Fence construction on the Pointer Allotment boundary. No fence is preferable, but only if non-use continues.
- Not target dead and dying.

Alternative E has so few desirable features that it would be simpler to alter one of the other three we consider viable.

Desirable features of Alternative F:

- Heavy reduction of juniper stands.
- Thinning of mahogany throughout the project area.
- Reduced ground-based logging impacts.

Note: 4.7.6, 1<sup>st</sup> paragraph on page 159 refers to ground based logging systems that do not fully suspend logs. The design criteria common to all action alternatives on page 31 indicate that ground based logging will not change between alternatives. The previous paragraph could be misleading by inferring that system would be inferior to other alternative systems.

- Leave patches for wildlife

Each alternative also has drawbacks, some of greater concern than others. Estimates of harvest volumes by diameter range would have been helpful. Alternative D apparently harvests greater volume than F, but has far less monetary value. Is this because more large diameter dead and dying are harvested in F, or because more large diameter green trees are taken in Alternative F, or both? Or, because the lower graded bands are greater in diameter and contain much greater volume to be harvested more intensively?

Cumulative effects are admittedly diluted by the immediate adjacency of the Strawberry Wilderness Area, Canyon Mountain and the National Forest to the south. However, we have yet to receive an invitation from the Malheur National Forest to discuss their plans for the Canyon Creek “interface” fire break project in planning stages. This project could dramatically compound the cumulative effects of prior BLM and private land activities.

Alternative D produces a uniformly spaced forest with a low basal area. Increasing basal area in a mosaic pattern throughout, and providing wildlife with a higher component of hiding and sight distance cover by leaving a component under 7” diameter, would make this alternative very palatable. With no stands above 60 basal area, Alternative D would provide little wildlife habitat. By incorporating Table 4.12 for Alternative F, we could strongly support Alternative D. The main road is impacting Little Pine Creek, and any alternative needs to realign the road, repair the culvert, and eliminate crossings where possible. Our preferred option would also include obliterating existing unneeded or resource damaging roads and no new road construction.

Harvest activities should be conducted over snow, or ground-based (tractor) logging kept to an absolute minimum.

Road closures will only be successful if OHVs cannot go cross-country, but obliteration should still be completed and necessary administrative rules enforced.

A buffer larger than 250’ around the pit would not only provide a greater sound barrier, but also provide a small amount of intact, unthinned habitat at the lower elevation.

Any fence should be lay-down type of three wires with a bottom no less than 14” from the ground and the top wire as low as possible.

Wildlife cover patches of 5-10 acres totaling 250 acres should be in the preferred alternative and dispersed throughout the project.

Finally, if the local community voiced concerns about garbage dumping and OHV use, they should be given the opportunity to be part of the solution, perhaps by policing their neighbors and coordinating with authorities to develop an enforcement response plan.

The Team put together an excellent document reflecting their high degree of skill. We hope there is some room for compromise to bring together many proposed actions that will benefit the watershed and provide habitat for the wide variety of wildlife on Little Canyon Mountain.

Sincerely,



Tim Unterwegner  
District Fish Biologist



Darren Bruning *for*  
District Wildlife Biologist



Ken Rutherford  
Asst. Dist. Wildlife Biologist