



Oregon

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Re: Toolbox Fire Recovery Project DEIS

The Oregon Department of Fish and Wildlife (ODFW) has reviewed the Draft Environmental Impact Statement (DEIS) for the Toolbox Fire Recovery Project. ODFW supports the development of long-term, sustainable forest habitats that are maintained in part by re-introduction of fire. ODFW recommends implementation of the preferred alternative (Alternative G) with several modifications.

Fuels Treatments – ODFW recommends mechanical treatment of stands within the ponderosa pine/bitterbrush/fescue vegetation type that contain shrubs, and were not impacted by the wildfire. ODFW is concerned that some of the prescribed fire identified in Alternative G would result in the loss of the remaining shrub component within the project area. The shrub component, specifically bitterbrush, is important forage for mule deer. Mule deer management objectives set in the late 1980's are based on reasonable habitat availability, and set substantially below historically high population levels. These management objectives were adopted into The Fremont National Forest, Land Resource Management Plan (LRMP). Loss of any additional bitterbrush would limit the ability of the Silver Lake mule deer herd to sustain itself at management objective. Prescribed fire projects have been implemented on 23,850 acres within the project area over the last 20 years. USFS monitoring of prescribed fire projects consistently demonstrates 60 percent or greater loss of the shrub component within this habitat type. For example, the Chaser Broom (CB) project has had successive prescribed fire projects implemented over the past 15 years. Fall mule deer herd counts in the CB project have shown a substantial reduction in mule deer numbers. More than half of the 49,500 acres of national forest land within the project area lost a substantial amount of shrub component. Prior to the fire, prescribed fire projects had already been planned and approved for an additional 9,600 acres within the project area. Alternative G proposes new prescribed burning on 3,572 acres, as well as on an additional 5,596 acres within ¼ mile of private timberland. The amount of prescribed burning proposed under Alternative G will impact the remaining shrub component within the project area. This, in turn, could further negatively impact mule deer numbers, and impact the Forest's ability to provide the habitat needed to keep the Silver Lake mule deer at management objectives.

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Roads – The Freemont LRMP identified open road densities that provide for big game habitat needs. ODFW recommends that Alternative G be modified to meet the LRMP Standards and Guidelines for open road densities no greater than 2.5 miles per square mile on mule deer summer range, 1.5 miles per square mile on transition range, and one mile per square mile on mule deer winter range. Furthermore, all roads within the Riparian Habitat Conservation Areas (RHCA) should be decommissioned to meet the “functioning appropriately” standard for sub-watershed road densities. No new roads should be constructed or existing roads re-opened within the RHCA. The DEIS states that the current open road density within the fire perimeter is 3.7 miles per square mile. Alternative G proposes an open road density of 2.6 miles per square mile; the highest of all the alternatives. However, the DEIS does not identify open road densities within mule deer summer, transition and winter ranges. Can the Final EIS provide the open road densities within mule deer summer, transition and winter ranges?

ODFW recommends Alternative G be modified to eliminate the requirement for a LRMP site-specific amendment for mule deer cover and habitat effectiveness. Under the LRMP Standards and Guidelines, Alternative G requires a site-specific LRMP amendment, because mule deer cover and habitat effectiveness are currently below standards. The DEIS states the proposed prescribed fire treatments could lower cover by 35 percent. The eight sub-watersheds contain major portions of summer, transition and winter ranges of the Silver Lake mule deer herd. LRMP standards and guidelines for habitat effectiveness are not being met in any of the sub-watersheds. Percent cover standards are being met in only transition range of Middle Silver Creek sub-watershed and on summer ranges of Thompson Reservoir and West Fork sub-watersheds. Closing and decommissioning roads can mitigate for the loss of cover and increase habitat effectiveness.

As stated in the DEIS, “roads account for most of the sediment problems in a watershed, because they are a link between sediment source areas...and stream channels. They directly affect channel morphology of streams by accelerating erosion and sediment delivery, and by increasing the magnitude of peak flow.” (pp.3-297). Increases in sediments have direct impacts to aquatic insects, amphibians, fish and their habitats. USFS measurements directly after the fire showed substantial increases in erosion rates over pre-fire measurements. Eight sub-watersheds are located within the Toolbox Fire Recovery Project area. The DEIS evaluation of the existing condition of these sub-watersheds showed Benny, East Duncan, Thompson, Upper Duncan, Upper Silver and West Fork Silver creeks are functioning at “unacceptable risk” for road densities. Lower Duncan and Middle Silver are functioning at “risk” for road densities. The DEIS predicts road closure and decommissioning activities proposed under Alternative G would result in the eight sub-watersheds functioning appropriately, but at risk. Decommissioning additional miles of roads will further reduce the level of risk to these streams. Sediment estimates from the miles of roads closed or decommissioned are considered sediment savings, thereby improving stream function and water quality.

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Snag Densities – Overall, ODFW supports recommendations in Alternative G for snag densities and sizes for retention within salvage units, but ODFW recommends Alternative G be modified to eliminate the proposed salvage of snags within the salvage unit acreages identified as optimal Lewis and Black-Backed woodpecker habitat. Black-Backed Woodpeckers are listed on Fremont National Forest Management Indicator Species list. Lewis and Black-Backed woodpeckers are listed on the Sub-province Central Oregon/Klamath Basin Focal Species list, and are listed Critical on the ODFW Sensitive Species list. To provide for snag dependent species, the Wildlife section of the DEIS recommends no salvage in fire created snag clumps of identified optimal Lewis and Black-Backed Woodpecker habitats. Outside the salvage units but within the project area, the DEIS states that fire created 900 acres of optimal Lewis Woodpecker habitat. It also created 12 areas totaling 1,789 acres the DEIS identified as optimal Black-Backed Woodpecker habitat. Alternative G proposes salvage of snags on 216 acres of optimal Lewis Woodpecker habitat. The DEIS states that due to the increased amount of fuels treatment within the ¼ mile of private land under Alternative G, only 5 of the 12 areas identified as optimal Black-Backed Woodpecker habitat would remain large enough to function as effective habitat.

Old Growth – ODFW has concern that habitat is provided for old growth dependent species. The DEIS is not clear whether the replacement old growth stands will be reclassified from Management Area 5, and dedicated as Management Area 3 or 14. ODFW recommends that portions management area 5 be converted to management area 3 or 14 as was done in previous fires.

Down Wood in Upland Habitats – ODFW recommends modifying Alternative G to incorporate the higher down wood levels developed by USFS staff using DecAID. Furthermore, any trees that are on the ground prior to commencement of the salvage operation should remain as down wood. Down wood contributes to the hydrology of a site and provides nutrient recycling. Wildlife use down wood for denning, nesting, foraging, fawning and calving. Based on USFS personnel field observations as identified in the DEIS, down wood levels are currently deficient due to consumption during the fire. Across the landscape, levels are below LRMP Standards and Guidelines. All alternatives allow existing merchantable down wood within commercial salvage units to be removed to the extent that the LRMP minimum standard per acre remains. Alternative G recommends the greatest amount of prescribed fire. Thus, it has the greatest potential to impact future down wood levels.

Large Wood in Streams – Large wood provides for significant in-stream habitat for native salmonids. ODFW recommends modifying Alternative G to incorporate the higher large woody debris (LWD) levels identified in Interior Columbia Basin Ecosystem Management Plan.

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Furthermore, all down trees within the RHCA that have fallen into or could fall into the stream channel should be retained in their entirety as down wood and LWD. LWD in streams is important for stream channel complexity, sediment storage, creation of pools, undercut banks, and sources of food and cover for salmonids. The portion of a piece of LWD outside the active stream channel functions as an anchor to trap other pieces of LWD moving through the stream channel. The DEIS evaluation of the existing condition indicates Silver Creek (in all sub-watersheds) and Thompson sub-watershed are functioning appropriately, but at risk for LWD. Alternative G would allow existing merchantable LWD within RHCA to be removed in excess of the minimum LRMP standards. The amount and location of prescribed fire treatments identified in Alternative G would likely have negative effects on potential future LWD recruitment levels.

Cover Patches – ODFW supports the DEIS recommendation to maintain one small, unthinned cover patch per acre in treatment areas outside of salvage units. ODFW recommends the unthinned cover patches outside of the salvage units be protected from prescribed fire. Non-merchantable green and burned trees 9" to 14" dbh provide habitat for bird nesting and foraging, as well as mule deer escape cover, fawning and calving cover. Within salvage units ODFW acknowledges the need for site preparation by means of removal of all dead standing trees outside of snag clumps prior to reforestation to insure the safety of tree planters. The DEIS states that prescribed fire may reduce cover within the existing cover stands by 35 percent. The amount of site preparation and prescribed fire identified in Alternative G will likely have negative impacts on cover patches. Closing and decommissioning roads can mitigate for the loss of cover. Can cover patches within the salvage units be identified and maintained in association with the snag clumps?

Fawning and Calving Habitat – Because of the sensitivity of big game to disturbance, ODFW recommends that no activities occur within mule deer fawning and elk calving areas between April 15 and August 15. Mitigation measures identified in Alternative G are inadequate to protect this critical habitat. Mule deer and elk utilize riparian areas, wet meadows and moist forest stands for fawning and calving. Fawn and calf survival is dependent on protection from disturbances during this critical time. Fawning and calving habitats were extensively impacted within the fire perimeter. Closing and decommissioning roads can provide protection to this critical habitat. ODFW offers to work with USFS staff to identify important fawning and calving areas to be protected.

Reforestation – To enhance and protect deciduous riparian vegetation, ODFW recommends no direct prescribed fire treatments in Category 1 and 4 RHCA. Prescribed fire can be allowed to back into the RHCA. All alternatives propose no conifer planting between 50 and 150 feet from aspen. This should enhance aspen stand development.

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In addition to these leave areas, ODFW recommends no planting within 150 feet of snag clumps or 50 to 150 feet from alder, black cottonwood and mahogany patches to promote the development of these deciduous vegetation habitats. To promote forage production across the landscape, ODFW recommends no conifer planting in openings created by the fire less than 5 acres in size.

In closing, ODFW has been committed to ensuring that wildlife habitat values are being met while addressing the needs of the local community. Through the Access and Habitat Program, ODFW has previously made funds available to private landowners for revegetation projects on private lands affected by the Toolbox fire. We appreciate this opportunity to comment on the restoration plan.

ODFW has already provided numerous editorial comments to various USFS staff for incorporation into the FEIS. If you have any questions or need additional information regarding these comments, please feel free to contact my staff or me.

Sincerely,



Chip Dale
High Desert Regional Director

cc: Jim Myron - GNRO
Lance Clark - ODF
Roy Elicker
Ron Anglin
Bob Hooton
Craig Foster