



June 14, 2018

Dean Schlichting, District Planner
McKenzie River Ranger District
Willamette National Forest
57600 McKenzie Highway
McKenzie Bridge, OR 97413

E-mail: <https://cara.ecosystem-management.org/Public//CommentInput?Project=53966>

Subject: Scoping Comments – Flat Country Project

The Rocky Mountain Elk Foundation (RMEF) strongly supports the Flat Country Project and the active forest management it proposes.

RMEF is pleased to note the Flat Country Project proposes to create early seral habitat by creating gaps and aggregate retention harvest, and to improve meadow habitat. The proportion of the project area in the early seral vegetation class is currently less than 1% (Dean Schlichting personal communication) which is well below historical range of variability. With early seral vegetation at such a low level over a planning area as large as the Flat Project's area the population of wildlife obligated to early seral are very likely severely reduced across the project area, a situation this project can remediate.

Our scoping comments are:

1. Plan the project to restore the early seral vegetation type to its historical level of prevalence within the project area. Specify development of complex early seral in the Purpose and Need statement.
2. Create gaps of up to five acres within thinning units to provide for early seral vegetation, plant the gaps to native grass, forbs and browse shrubs to provide big game forage; allow gaps to naturally reforest.
3. Within thinning units located in Matrix LUA, thin to 35% crown closure to provide for understory development.
4. Within thinning units provide big game security by leaving skips (untreated areas) to provide adequate hiding and security cover.
5. Ensure collaboration with local Oregon Department of Fish and Wildlife Department's (ODFW) local wildlife biologist.
6. Seed all disturbed soil using native seed mix of grass and forbs of high forage value for big game – landings, skid trails, yarding corridors, decommissioned roads. The Scoping letter indicates proposal to de-commission 11 miles of road plus the 16 miles of temporary road to be constructed and decommissioned could be seeded to big game forage thus providing 55 miles of lineal meadow.

Bill Richardson | Oregon & Washington Sr. Lands Program Manager
24550 Ervin Road | Philomath, OR 97370 | (541) 929-3011 | brichardson@rmef.org
5705 Grant Creek Rd. | Missoula, MT 59808-8249 | (800) CALL ELK | WWW.RMEF.ORG



7. RMEF is pleased to note the project proposes to enhance 368 acres of wet and dry meadows.
8. Utilize Westside Elk Nutrition and Habitat Utilization Models to analyze the impacts of the various action alternatives which will be developed.
9. Address in the environmental document the requirements of Section 2 of Presidential Executive Order 13443 of August 16, 2007 - Facilitation of Hunting Heritage and Wildlife Conservation. (<http://www.gpo.gov/fdsys/pkg/FR-2007-08-20/pdf/07-4115.pdf>)
10. Invite the local ODFW wildlife biologists to participate on the Interdisciplinary Team developing the project.

The Rocky Mountain Elk Foundation is a non-profit conservation organization whose mission is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. The Elk Foundation also works to open, secure and improve public access for hunting, fishing and other recreation.

Thank you for the opportunity to submit comments on this project.
Sincerely,

Bill Richardson
Oregon & Washington Sr. Lands Program Manager
Rocky Mountain Elk Foundation