



January 2, 2019

Heppner Ranger District
ATTN: Leslie Taylor
Umatilla NF
P.O. Box 7
Heppner, Oregon 97836

E-mail: ldtaylor@fs.fed.us

Subject: Scoping Comments - Ellis Vegetation Management Project

The purpose of this letter is to state the Rocky Mountain Elk Foundation's (RMEF) strong support for the active forest management proposed for the Ellis Vegetation Management Project. RMEF concurs with the stated Purpose and Need for the project and is particularly pleased to see "Improve wildlife habitat" as one of the stated purposes and another to be "Improve culturally significant resource" focusing on elk and other wildlife.

RMEF has the following comments and recommendations for consideration:

1. RMEF strongly supports active forest management and is supportive of the proposed thinning prescriptions but suggests incorporating creation of gaps of 2 to 5 acres be created to enhance big game forage for a longer period than provided by a normal thinning.
2. RMEF suggests that deer and elk hiding and security cover, skips, should be carefully incorporated into all thinning prescriptions.
3. RMEF strongly supports the proposed silvicultural activities to enhance aspen groves, wet meadows and sagebrush steppe habitat types. With respect to aspen enhancement, RMEF suggests that all conifers within aspen groves be removed regardless of DBH, (See PNW-GTR-806 Aspen Biology, Community Classification, and Management in the Blue Mountains)
4. RMEF recommends revegetating all soil disturbed by operations (i.e. skid trails, landings, decommissioned roads, etc.) by seeding with native grasses and forbs which will improve forage for big game and livestock, while reducing sedimentation of streams.
5. The RMEF will support amendment of the Forest Plan (and Eastside Screens) to allow harvest of trees greater 21 inch DBH to achieve need silvicultural objectives.
6. RMEF strongly recommends including Oregon Department of Fish and Wildlife's responsible wildlife and fisheries biologists into the USFS's interdisciplinary team preparing the environmental assessment for the Ellis Project.



7. RMEF suggests partnering with the Bureau of Land Management on adjacent and nearby federal lands to increase scope and scale of the project in this important landscape.

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,

A handwritten signature in black ink, which appears to read 'Bill Richardson', is positioned below the text 'Sincerely,'.

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