



Oregon

Kate Brown., Governor

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January 4, 2019

U.S. Forest Service
Attn: Leslie Taylor
PO Box 7
Heppner, OR 97836



Dear Ms. Taylor:

This letter is in regards to the request for scoping comments on the proposed Ellis project. The Oregon Department of Fish and Wildlife (ODFW) understands the need and desire to complete vegetation management in the project area.

However, we would recommend that the Forest Service (FS) analyze this project under the guidelines of the new Forest Plan. ODFW realizes that the new Forest Plan is still under litigation and is not a legal document at this point however ODFW would recommend that the FS uses it as a guide for this proposed project. The new plan has some very good guidelines for managing elk security on National Forest lands and ODFW feels it would be very beneficial to follow those guidelines. The proposed project area includes some of the Heppner big game management unit's highest elk density and it is very important to ODFW and our constituents that the project improve or maintain the elk habitat that is currently on the landscape.

Elk in portions of the project area routinely leave the National Forest lands and move on to private lands because of disturbance associated with forest users and the lack of suitable cover. During most years many of the elk in the northern and eastern portions of the project area have left the National Forest by the time first season elk season ends (usually the end of October). ODFW has been working with the FS to keep elk on public lands and accessible to the public hunters by utilizing salt sites in the spring to move elk onto public lands from wintering areas, trying to reduce road densities adjacent to private property and encouraging controlled burns to improve forage. Elk distribution has been a very difficult and controversial issue in much of the state. Elk use has shifted more towards private lands and away from public lands. This has led to reduced hunter opportunity and satisfaction on the public lands and increased problems of elk damage on private lands.

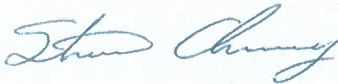
ODFW is currently working with many of the private landowners adjacent to the project area to reduce elk damage on private their private property. The Ellis project has the opportunity to help reduce this elk distribution shift by creating more favorable forage through thinning and controlled burns as well as reducing

road densities and improving elk security. Elk generally are disturbed by roads within a half mile of their location and closing strategic roads in the project area would help create more elk security areas and maintain elk on the National Forest for a longer period of time. ODFW would also recommend that the FS create areas of elk security that also include good forage areas so that the elk do not have to leave the security areas to find high value forage. The juxtaposition of the thinning, burning and road closures needs to be planned so that the elk have the best opportunity to fully utilize the resources available in the project area without leaving the elk security areas. Creating high quality forage in areas with little elk security would provide less benefit to the elk herd than having high quality forage in an elk security area.

Additionally ODFW would also recommend that any roads that are closed as part of this project are closed with physical barriers instead of just road closure signs. Physical barriers are much more effective at keeping areas closed and are easier to enforce. The FS should also consider some seasonal road closures both during the summer and winter to help with elk security.

I appreciate the opportunity to comment on the proposed project and look forward to working with the FS to implement this project and improve the elk habitat in the Ellis project area. Please feel free to call me at (541) 676-5230 if you have any questions regarding my comments.

Respectfully,

A handwritten signature in blue ink, appearing to read "Steve Cherry".

Steve Cherry
District Wildlife Biologist