## ROCKY MOUNTAIN ELK FOUNDATION



July 17, 2019

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E-mail: https://cara.ecosystem-management.org/Public//CommentInput?Project=55868

Subject: Scoping Comments – Youngs Rock Rigdon Project

The purpose of this letter is to state the Rocky Mountain Elk Foundation (RMEF) strong support for the active forest management proposed for the Youngs Rock Rigdon project, and to submit scoping comments regarding the proposed actions.

RMEF concurs with the statement of Purpose and Need for the project. We are pleased to note early seral creation and meadow rehabilitation prominently addressed in the scoping letter as both vegetation types are critical for wildlife habitat and diversity.

A large portion of the project area is designated by the Forest Plan as medium or high Big Game Emphasis or Big Game Winter Range and we trust the plan's guidance will be adhered to.

Our scoping comments are:

Add development of early seral vegetation and habitat to the Purpose and Need statement.

Plan to develop an amount of early seral vegetation acreage at least equal to the amount that was historically present.

In Matrix Land Use Allocation:

Where thinning is proposed, consider thinning to 35 percent crown closure to provide sunlight needed for understory grasses, forbs and shrubs to develop for wildlife forage. Where gaps are proposed, consider increasing size up to 3 acres to provide wildlife forage for a longer period.

Allow gaps to naturally regenerate for forage instead of replanting them with conifers. 24 miles of roads are indicated to be decommissioned and we suggest these roads be seeded to native grasses and forbs of high big game forage value (and mulched to aid in establishment). This action would add several hundred acres of wildlife forage. Reseed landings and skid trails to native grasses and forbs of high big game forage value and mulch.

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Utilize the Westside Elk Nutrition and Habitat Utilization Models developed by USFS PNW Starkey Forest and Range Experiment Station to analyze the management alternatives developed for the project.

Seek to collaborate with the wildlife and fisheries biologists in the Oregon Department of Fish and Wildlife's Springfield, Oregon office on this 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