



Oregon

Kate Brown, Governor

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Thank you for the opportunity to provide comments on the Bohemia North Thin Project EA. The proposed project area is located on the Cottage Grove Ranger District, Umpqua National Forest, Layng Creek 5th field watershed, Lane County, Oregon. Actions proposed in the 29,784 acre project area include commercial and non-commercial thinning, shaded fuel breaks, temporary road construction, fuels treatments, big game forage gap creation, and noxious weed treatments.

Commercial thinning is proposed on 3,940 acres. Many of these stands are in or entering the stem exclusion stage. This developmental stage results in suppression of understory growth including forest regeneration, shrub, forb, and grass layers. The understory component is critical to many wildlife species ranging from amphibians to large mammals. Overall, proposed commercial thinning will provide short-term relief for wildlife by releasing understory growth. We encourage you to implement prescriptions permitting for the maximum spacing allowable by rule, while maintaining stand structural integrity. Maximum spacing will extend the benefits to understory rejuvenation and vigor, benefitting wildlife species for a longer duration. Benefits consists of increased forage, understory structure, and microsite complexity.

Based on an ODFW black-tailed deer study conducted from 2012-2017, we calculated deer density and home range size on landownership types in our North Indigo Wildlife Management Unit (WMU), which includes the Cottage Grove Ranger District. Preliminary results suggest deer density at approximately 4 deer/km² on USFS lands and 11 deer/km² on other land ownerships. Deer home ranges were 5.3 km² on USFS lands and 1.2 km² on other land ownerships. Annual home range sizes and deer movement patterns suggest most deer in this area are not migratory. Therefore, winter and summer range are sympatric. Ungulate recruitment is strongly driven by forage quality and quantity. We surmise that the lower deer density rates and increased home range size observed on national forest lands reflect the lower quality and quantity of forage resources available to big game species compared to other land ownerships.

Proposed commercial thinning includes 1,252 acres within big game winter range. Approximately 12 forage gaps 2-3 acres in size are included in the proposal. Some reforestation may occur utilizing a more diverse array of species. We support your efforts to improve habitat conditions within big game winter range management areas. The forage gap features are critically important for providing early seral habitat necessary for quality big game forage. We support any opportunities to increase the number and/or size of the forage gaps. Additionally, we reiterate the benefits of thinning to maximum spacing to increase the duration of these treatments to big game habitat.

The scoping letter indicates that all temporary roads would be decommissioned after use. We support the decommissioning of all temporary roads. We ask you to consider a seed mixture of native forage species for big game on any ripped and seeded roads. Should temporary roads need to be kept open for access over a several year period for administrative purposes, please consider installing gates that are closed permanently or seasonally in project areas where big game is a primary management focus. Seasonal closures should include fall, winter, and spring time periods. These closures would provide better security for big game during the hunting seasons, overwintering, and fawning/calving periods. If permanent and/or seasonal gates are cost prohibitive, we would be more than willing to work with your wildlife staff on trying to secure funding through the Oregon Hunters Association or Rocky Mountain Elk Foundation grants.

Proposed fuels treatments include jackpot burning and underburning. These two fuels treatments have the potential to improve the quantity and quality of forage for wildlife, especially big game species. We encourage you to utilize these fuel treatments whenever possible over chipping and piling. Fire plays a key role in PNW ecosystems. Many native plant communities are dependent on periodic fire to rejuvenate vigor and repopulate. In addition to stimulating the grass and forb layers, mature fire-dependent shrub communities that are burned will resprout and provided high quality forage. Most of these shrub communities within the project area are in a mature stage of development and currently provide little to no forage value for wildlife.

Non-native, invasive weed treatment is identified as a project objective. ODFW supports weed abatement methods including manual, chemical, or biological. The severe negative impacts non-native, invasive plants can have on ecological communities necessitates the USFS having access to all these abatement methods.

Thanks again for the opportunity to comment on the Bohemia North Thin Project EA. If you have any questions or would like to discuss these recommendations in more detail, please contact me by email at christopher.g.yee@state.or.us or by phone at 541-726-3515 x27.

Respectfully,



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