



**ROCKY MOUNTAIN  
ELK FOUNDATION**

January 27, 2020

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E-mail: <https://cara.ecosystem-management.org/Public//CommentInput?Project=57351>

Subject: Scoping Comments - Quartzville-Middle Santiam (QMS) Project

The purpose of this letter is to state the Rocky Mountain Elk Foundation (RMEF) strongly supports the QMS Project and the Forest Service's stated Purpose and Need for the project.

The QMS project area lays within an area dominated by plantations of Douglas-Fir. Due to lack of active forest management over the past 20 years (and fire suppression) there is very little early seral age class vegetation. Certainly, the amount of early seral habitat is below its HRV for the area.

Oregon Department of Fish and Wildlife's (ODFW) Santiam Wildlife Management Unit (WMU) overlays the QMS project area. Within the Santiam WMU both black-tail deer and Roosevelt elk populations are substantially below management objective. Lack of early seral forage habitat is a major contributing factor. Deer and elk are but two of more than 100 wildlife species obligated to the early seral vegetation type (O'Neil et al, 2001). Some of those species obligated to early seral are on the Regional Forester's List of Sensitive Species.

The project area is totally designated by the Forest's Land and Resource Management Plan (LRMP) as Big Game Emphasis area - medium, High or Winter Range. The Forest's LRMP contains Standards and Guidelines for Big Game Emphasis Areas and RMEF anticipates they and other Forest Standards and Guidelines concerning wildlife habitat will be adhered to development of the management alternatives for this project.

RMEF propose the following comments for consideration:

1. Make development/restoration of early seral and wildlife forage habitat a Stated Need of the project.
2. Increase the amount of thinning, gap recreation and shelterwood harvest substantially to an amount comparable to historical prevalence.

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3. The amount of active forest management is not 7890 acres as stated in Table 2. The 7890 figure includes 1500 acres of skips which is not treated.
4. Thin down to 35-45% crown closure in both Matrix and LSR LUA. This action will allow the remaining stand to grow more rapidly toward older forest conditions due to less competition for resources. while also allowing light to stimulate growth understory grasses, forbs and shrubs for wildlife.
5. We recommend the Forest Service utilize the Westside Elk Nutrition and Habitat Utilization Models available from the PNW Research Station, Starkey Experimental Forest and Range to analyze both the current and proposed alternatives upon elk, and by extension, black-tail deer. The 89,000-acre planning area and the 7900-acre treatment area fit the models parameters nicely.
6. Revegetation of all disturbed soil utilizing a seed mix of native species of high forage value and palatability for elk and deer – landings, skid trails, the 14 miles of decommissioned system roads, and the 32 miles of temporary roads that will be returned to natural. Revegetating the disturbed soil area will provide several hundred acres of wildlife forage.
7. Establish and maintain close collaboration with the ODFW District Wildlife Biologist at the South Willamette Watershed Office in Adair Village, Oregon, regarding the QMS project and how active forest management can contribute to revitalization of the populations of deer, elk and other early seral obligated wildlife.

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 provide scoping comments on this project.

Sincerely,



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

References:

O'Neil, Thomas A., et al, Matrix for Wildlife-Habitat Relationships in Oregon and Washington. Northwest Habitat Institute. 2001.

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