



Oregon

Kate Brown, Governor

Department of Fish and Wildlife



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January 29, 2021

Slater Turner, District Ranger
Paulina Ranger District
Ochoco National Forest
3160 NE Third Street
Prineville, OR 97754

RE: Mill Creek Dry Forest Restoration Project

Dear Ranger Turner,

As the agency mandated with management of Oregon's fish and wildlife (ORS 496.012), the Oregon Department of Fish and Wildlife (ODFW) is responding to your request for comments on the Mill Creek Dry Forest Restoration Project (Project).

ODFW agrees with the issues outlined in the Project's Purpose and Need that much of the Ochoco National Forest's (Forest) composition, structure, and density has deviated from its historical condition. Therefore, we generally support restoration efforts to improve forest resilience and sustainability. However, in terms of impacts to fish and wildlife habitat, there are other Forest components that have changed drastically in the last 100+ years and should be considered alongside stand conditions. Recreation, both motorized and nonmotorized, is also having a negative impact on fish and wildlife habitat suitability and use and is increasing in its cumulative effects. Without concurrent, focused management of recreation infrastructure and its users, efforts to improve wildlife habitat through vegetation treatments could be diminished. ODFW would like to see the Project strike a balance between managing for the concerns around recreation as well as stand condition.

With the general statement above as a foundation, ODFW has the following specific comments:

Riparian Habitat

- Provide specific information regarding the Project's flood plain manipulation components and their predicted impact on sensitive listed red band trout in adjacent creeks.
- Include removal of unauthorized fish passage barriers of such as the "user created dam" at Wildcat Campground.

Wildlife Habitat

- Use the USFS Blue Mountain Elk Nutrition and Habitat Model in to quantify impacts of the Project's action alternatives.
- Work with Forest wildlife staff and local ODFW biologists to develop action alternatives that emphasize retention of cover in elk security areas.

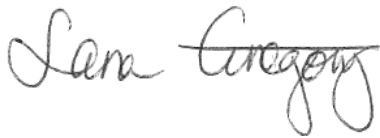
Travel Management

- Exclude wilderness and other roadless areas from travel management analysis. This will reduce potential misrepresentation of action alternatives in terms of road density and habitat fragmentation.

- The proportion of roads closed or decommissioned (Table 1, Scoping) is very low relative to those that will be maintained, reconstructed, temporarily constructed etc. This increases the risk of habitat fragmentation both physically and temporally as Forest users seek out new recreational opportunities.
 - Include a timeline for closure and decommissioning of temporary routes.
 - Will temporary roads be treated as Maintenance Level 1 "Closed" roads? If yes, what will be done post Project implementation to restrict motorized access?
 - When physically closing/decommissioning roads, prioritize complete obliteration instead of berms, boulders or debris.

Thank you for the opportunity to comment. Please contact me if you have questions or to request further information regarding these recommendations.

Sincerely,

A handwritten signature in dark ink, appearing to read "Sara Gregory". The signature is fluid and cursive, with the first name "Sara" and last name "Gregory" clearly distinguishable.

Sara Gregory
Wildlife Habitat Biologist
Deschutes Watershed
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541-388-6147

cc: Mike Harrington – Acting ODFW East Region Manager
Corey Heath – Acting ODFW Deschutes Watershed Manager
Greg Jackle – ODFW Ochoco District Wildlife Biologist