ROCKY MOUNTAIN ELK FOUNDATION

August 19, 2021

Responsible Official
c/o Hilary Krieger, NEPA Planner
Middle Fork Ranger District
46375 Hwy 58
Westfir, OR 97492

E-mail: https://cara.ecosystem-management.org/Public/Commentinput?project=55868

Subject: Comments – Youngs Rock Rigdon DEIS

The purpose of this letter is to state the Rocky Mountain Elk Foundation (RMEF) supports the Forest Service's selection of Alternative 2 as the preferred alternative. RMEF concurs with the stated purpose and need for the project and supports the proposed forest plan amendment necessary for the full implementation of the project.

Within the project area the prevalence of early seral forest habitat is well below its historical range and this situation adversely impacts wildlife species that depend upon early seral vegetation for forage and other lifecycle requirements. RMEF is therefore pleased to see the level of regeneration harvest proposed in Alternative 2 and the proposed meadow and oak savannah restoration. These actions will lead to development and enhancement of early seral vegetation, increased wildlife carrying capacity and species diversity.

RMEF has the following comments:

1. In commercial thinning with gaps, the Forest Service proposes to use ½ acre gaps. RMEF suggests the edge effect shading by the adjacent stand will cause the ½ acre gap to result in little value in providing early seral vegetation for wildlife habitat. RMEF suggests gaps up to 3 acres in size will provide more early seral vegetation and for a much longer time period.
2. All decommissioned roads should be specifically targeted for revegetation with native big game forage species resulting in lineal meadows to provide forage. Likewise, landings and skid trails should be targeted for revegetation with big game forage species.
3. We are pleased to see the Forest Service analyzed the project using the relatively new Westside Elk Nutrition Model and that the model indicated Alternative 2 Preferred provided more forage improvement than Alternative 3.
4. At DEIS page 196 the document discusses thermal cover and cites the 1990 Forest Plan regarding the value of canopy cover to elk. RMEF strongly

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recommends USFS update the information in the wildlife-big game analysis about the need for thermal cover. Over 20 years ago, research showed that thermal cover is not a necessary requirement for elk (Cook et al. 1998). This research along with further reviews (Cook et al. 2005) highlighted the need to focus on forage/nutrition and security from disturbance.

5. Elk are particularly sensitive to disturbance by open roads. Alternative 2 Preferred reduces open road density more than Alternative 3. That said, the Forest Plan standards for open road density are not achieved. Please re-assess for more opportunity to reduce road density and wildlife disturbance. PNW Starkey research points this fact out and has published the Westside Elk Habitat Selection Model which may be useful in analysis.
6. This project proposes to restore and enhance the Pine-Oak Savannah vegetation type that is identified as a habitat in critically short supply by ODFW Conservation Strategy document.
7. We are pleased to note the indications of collaboration with the local ODFW Wildlife Biologist.

Thank you for the opportunity to submit comments on this DEIS.

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.

Sincerely,

Bill Richardson
Sr. Conservation Program Manager - Western
Rocky Mountain Elk Foundation

Citations:

Cook, J. G., L. L. Irwin, L. D. Bryant, R. A. Riggs, and J. W. Thomas. 1998. Relations of forest cover and condition of elk: a test of the thermal cover hypothesis in summer and winter. Wildlife Monographs 141.

Cook, J. G., L. L. Irwin, L.D. Bryant, R.A. Riggs, and J. W. Thomas. 2005. Thermal Cover Needs of Large Ungulates: A Review of Hypothesis Tests. Pages 185-196 in Wisdom, M. J., technical editor, The Starkey Project: a synthesis of long-term studies of elk and mule deer. Reprinted from the 2004 Transactions of the North American Wildlife and Natural Resources Conference, Alliance Communications Group, Lawrence Kansas, USA.

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