



# Oregon

Kate Brown., Governor

## Department of Fish and Wildlife

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March 31, 2022

U.S. Forest Service  
Attn: Leslie Taylor  
PO Box 7  
Heppner, OR 97836



Dear Ms. Taylor:

This letter is regarding the request for comments on the Draft Environmental Impact Statement (DEIS) for the Ellis project. This letter contains the Oregon Department of Fish and Wildlife's (department) comments on the DEIS.

### COMMENTS

#### Comment 1

The draft DEIS needs to include more detail regarding the treatments proposed and the exact locations of treatment units. It would be helpful to have unit locations to fully understand the differences between alternatives.

#### Comment 2

On page 14 of the EIS it states that where appropriate some seeding may occur. The department would recommend that guidelines for when and where seeding would be initiated are included in the EIS. We would also recommend having a seed mix that is beneficial to wild ungulates and that would include a forb component. The department would recommend seeding at a minimum all skid trails and landings after work is completed.

#### Comment 3

The table on page 39 states that all the treatments will improve habitat for bighorn sheep by opening of habitat for better line of sight and increased forage. The department is unaware that any of the proposed activities would be on the steep slopes where bighorns spend most of their time. Marginal improvements may occur on the tops and more gradual slopes where activities will occur, but it is unclear whether this EIS proposes work in those steep environments.

#### Comment 4

The Rocky Mountain elk portion of the Environmental Consequences section needs to have additional information regarding the anticipated forage response due to the proposed activities. Elk and deer respond to fuel and prescribed fire treatments differently but both species select for these treatment areas in both the

short and long term up to at least year 15 post treatment years (Spitz et al 2018, D. Clark, ODFW Wildlife Research, pers comm). The Ellis project will create many acres of these proposed treatments that will have a beneficial effect on summering elk and deer. The department would also recommend creating treatment units that retain approximately 40% canopy cover after treatment. Mule deer have been shown to select for areas of approximately 40% canopy cover in south central Oregon (Eckrich et al 2020). This level of overstory canopy provides optimal forage growth and creates high quality forage for lactating does. The need for high quality forage is highlighted by Merems et al 2020, they found that there was not enough high-quality forage in the nearby Starkey experimental forest on much of the range to support an adult lactating doe with a single fawn. The same study also found that mule deer were able to select for higher quality forage in the use area which would suggest that improvements in forage by Ellis treatments would be found and utilized by mule deer.

#### **Comment 5**

There should also be discussion in the elk portion of the Environmental Consequences section regarding the juxtaposition of the proposed treatments and security areas and open roads. Creating high quality elk forage in areas where elk feel secure is much more valuable than high quality forage adjacent to the road. Elk avoid open roads especially during hunting seasons and may move to areas of lower quality forage with a higher canopy cover. (Spitz et al 2019, Smith et al 2022). Additionally, Brown et al 2020 found that mule deer reduce movements and spend more time in thicker cover with less forage in response to hunting seasons. This all highlights the needs for careful consideration of the juxtaposition of road closures, vegetation management and higher density cover areas.

#### **Comment 6**

On page 85 it states that bighorn sheep prefer Douglas fir ponderosa pine and shrub steppe cover types. Most of our California bighorn sheep prefer more shrub steppe type habitats and do not spend much time in Douglas fir or ponderosa pine habitats.

#### **Comment 7**

Page 85 lists the gray wolf as a sensitive species. Gray wolves have been relisted as endangered at this time.

#### **Comment 8**

On page 94 the DEIS states that the Ellis project was broken up into seven sections for the Habitat Effectiveness Index (HEI) analysis. The department recommends some additional language in the EIS that explains why the area was separated into seven sections to be analyzed.

#### **Comment 9**

On page 108 the DEIS has some analysis of the area that would be within ½ mile of an open road after the treatments are completed. This was done to show the amount of area in the project that would no longer be within ½ mile of an open road and accessible to most hunters. The department appreciates this discussion

but would also recommend some additional language in the analysis that explains that this would also create the same number of acres that are further than a half mile from an open road. Many hunters are looking for areas further away from roads to hunt. While the road closures would influence hunters who are unwilling or unable to travel more than a ½ mile from a road there are many hunters who actively pursue those areas further away from roads. Both sides of this discussion need to be outlined in the EIS.

**Comment 10**

On page 130 the DEIS states that a full list of design features to prevent the spread of noxious weeds could be found in Chapter two. I was unable to locate anything in chapter two except language in a table that stated standards from the Pacific Northwest Region Invasive Plant Program would be incorporated. Weeds continue to be a detriment to wildlife habitat and the control of and reduction of spread of weeds is very important in the conservation of wildlife habitats. The department would recommend that the EIS have additional information regarding some of the steps that will be taken to reduce the spread of weeds from the activities proposed.

**Comment 11**

Specific language in the DEIS lacked information on how the roads closed by this project would be implemented. The Department recommends that any roads that are closed as part of this project are closed with physical barriers instead of just road closure signs. Physical barriers are much more effective at keeping areas closed and are easier to enforce. Elk show the same avoidance to all motorized vehicles during hunting seasons (Spitz et al. 2019, Smith et al. 2022). If physical barriers do not prevent access by motorized vehicles, the closures will not be effective at meeting objectives related to elk security areas.

**Comment 12**

The department requests more information to fully understand the different alternatives. In general, we are supportive of Alternative five road closures and treatment options. However, we would recommend using the fuel break management that is outlined in Alternative four. Providing elk security levels above 30% for the entire project area creates a minimum level of elk security in the area to maintain elk on public lands longer so they are available to the public during hunting seasons. Alternative five is the only alternative that provides that level of elk security. The treatments described in the alternative five also will provide high quality elk and deer forage in the project area. The department understands the need and desire to create fuel breaks along the open road system however we do not feel that the level outlined in alternative five is necessary to meet the needs of the project. The department feels that the fuel breaks outlined in Alternative four is a good compromise between creating defensible fuel breaks and maintaining visual cover for elk and deer along the open road system. Creating open areas along the open road system also allows hunters to see elk and deer further off the road and increases elk and deer vulnerability to harvest.

The department appreciates the opportunity to comment on the Ellis Draft EIS and looks forward to working with the Forest Service to implement this project

and improve the elk and deer habitats in the Ellis project area. I have copies of any of the papers I have cited in this letter and can provide them to you if desired. Please feel free to call me at (541) 676-5230 if you have any questions regarding my comments.

Respectfully,

A handwritten signature in blue ink that reads "Steve Cherry". The signature is written in a cursive style with a large, stylized initial "S".

Steve Cherry  
District Wildlife Biologist