ROCKY MOUNTAIN ELK FOUNDATION

April 14, 2022

Doug McKay, District Ranger
ATTN: Leslie Taylor
Heppner Ranger District
Umatilla National Forest
PO BOX 7
Heppner, Oregon 97836

E-mail: https://www.fs.usda.gov/project/?project=41350

Subject: Comments – Ellis Integrated Vegetation Project DEIS

The purpose of this letter is twofold. First, to state the Rocky Mountain Elk Foundation (RMEF) concurs with the Draft Environmental Impacts Statement's (DEIS) statement of Purpose and Need for the Ellis Integrated Vegetation Project and recommends selection of action Alterative 5 for implementation. Second, to provide comments regarding the DEIS document.

The Ellis project proposes active forest management and RMEF supports such action. RMEF advocates for restoration and enhancement of wildlife habitat for all species. The Ellis project will most certainly provide habitat enhancement and increase species diversity.

The RMEF is very pleased to see within the Ellis Project the Forest Service's evident concern and address of the needs of elk for security from human disturbance, as well as the provision of quality elk forage on the public land to encourage the elk to remain on the public land. (DEIS page 2, Table 1-1)

The following are our comments on the DEIS document:

1. DEIS page iii and 18 – Elk Security defined. We are pleased to note that in the Ellis project elk security was defined and the proposed action alternatives evaluated for its presences. RMEF is concerned about the impact of human activity disturbance of elk on public lands to the degree unsecure move from good forage to poor forage or leave public lands for private lands where they become problematic. RMEF concurs with the Forest Service's selection of Hillis et al, 1991, as its definition of elk security.

Bill Richardson | Senior Conservation Program Manager - Western
24550 Ervin Road | Philomath, OR 97370 | (541) 929-3011 | brichardson@rmef.org
5705 Grant Creek Rd. | Missoula, MT 59808-8249 | (800) CALL ELK | WWW.RMEF.ORG

2. The DEIS needs to provide increased detail regarding treatment units for the reader to evaluate resource impacts better. The document does not contain a listing of treatment units or a map showing location. The DEIS maps are not easily readable or enlargeable so they can be read.

3. DEIS page 14 – Planting and Seeding. RMEF recommends shortening the proposed "within five years" to read within "within two years". Early seeding with preferred grasses and forbs will help reduce invasive species occupation of disturbed soils. Reseeded skid trails, landings, decommissioned roads, etc., can significantly increase quantity and quality of forage production for big game and livestock.

4. The DEIS needs to acknowledge Mule deer and address habitat benefits the Ellis proposed project will have on this species and it does not do so. Mule deer are present in the project area. They were once numerous but are now well below Oregon Department of Fish and Wildlife Management Objective. Forage habitat is one of the limiting factors listed in the ODFW's Mule Deer Initiative document. Research papers show mule deer select for areas of approximately 40% canopy cover in south central Oregon (Eckrich et al 2020) and PNW Starkey research indicates lactating does should benefit from the Ellis proposed thinning and prescribed fire (Merems et al 2020).

5. DEIS page 84 – Rocky Mountain Bighorn Sheep. The project area does not contain Rocky Mountain Bighorn sheep. California Bighorn sheep are present in the Ellis project area. (ODFW Heppner District). The analysis of bighorn sheep should be revised appropriately.

6. DEIS page 85 – Gray Wolf. The gray wolf is again endangered west of Highway 395 per a recent court ruling.

7. DEIS page 93 – Rocky Mountain Elk. The analysis contains no address of the forage enhancements the proposed treatment actions (thinning and prescribed fire) will provide for elk and this should be corrected in the final EIS. Research shows elk select for areas treated by prescribed fire almost immediately and out as far as 15 years because of the resulting flush of succulent forage (Spitz et al 2018). The importance of quantity and quality of summer and fall forage, which Ellis' treatments will produce, has been shown to enhance elk reproduction and survival (Cook et al, 2004).

8. The importance of creating quantity and quality of big game forage in relation to elk security habitat was not addressed. Creating quality forage in areas where the elk and deer will make use of it is what is needed. See Comment 2.

9. DEIS page 94 – Rocky Mountain elk. The Forest Plan requires use of dated science, the Elk Habitat Index (HEI) Model. One of the measures used by the HEI model is cover. Thermal cover has been found to be of little importance to Rocky Mountain elk (Cook et al, 2005). The frailty of the HEI model should be

Bill Richardson | Senior Conservation Program Manager - Western
24550 Ervin Road | Philomath, OR 97370 | (541) 929-3011 | brichardson@rmef.org
5705 Grant Creek Rd. | Missoula, MT 59808-8249 | (800) CALL ELK | WWW.RMEF.ORG

acknowledged. Also, an explanation of why the Ellis project was broken up into seven units for analysis would be helpful to readers understanding.

10. DEIS page 128, Invasive Species - RMEF recommends the Ellis EIS prescribe explicit and direct action to treat known and subsequently identified invasive vegetation (weeds) in the project area.

11. The DEIS needs to discuss in detail when to accomplish and how to be funded for Road Closures and Decommissioning proposed. Our recommendation is that road closures and decommissioning be accomplished at the conclusion of the treatment prescribed overlaying the designated road. Road closures and decommissioning's must be assured.

12. The DEIS needs to address funding for the many proposed special habitat restorations and enhancements, meadows, aspen, etc.,

13. Presidential Executive Order 13443 – should be acknowledged and addressed in the Final EIS. The Ellis project's proposed active forest management, forest thinning, special habitat enhancements (meadows, aspen, sagebrush steppe), and prescribed fire treatments will have long lasting beneficial impact up big game and other wildlife for at least 10-15 years.

In conclusion, RMEF recommends selection of Alternative 5 as the preferred alternative. It provides the most forage, wildlife (big game) security and wood product of all alternatives analyzed by the DEIS. The retention of elk and deer on public land off private land where they may become problematic is important to the success of the Ellis project. The RMEF strongly supports this project and the habitat improvement it will provide for elk, deer, and other wildlife species.

The Rocky Mountain Elk Foundation strongly supports this project and the habitat improvement it will provide for elk, deer, and other wildlife species. 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 comment.

Sincerely,

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

Citations:

Cook, J. G., B. K. Johnson, R. C. Cook, R. A. Riggs, T. DelCurto, L. D. Bryant, L. L. Irwin 2004. Effects of summer-autumn nutrition and parturition date on reproduction and survival of elk. Wildlife Monographs 155:1-61

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. March 20, 2004. Transactions of the North American Wildlife and Natural Resources Conference 69.

Eckrich, Carolyn & Coe, Priscilla & Clark, Darren & Nielson, Ryan & Lombardi, John & Gregory, Sara & Hedrick, Mary & Johnson, Bruce & Jackson, DeWaine. (2019). Summer Habitat Use of Female Mule Deer in Oregon. The Journal of Wildlife Management. 84. 10.1002/jwmg.21806.

Merems, Jennifer L.; Shipley, Lisa A.; Levi, Taal; Ruprecht, Joel; Clark, Darren A.; Wisdom, Michael J.; Jackson, Nathan J.; Stewart, Kelley M.; Long, Ryan A. 2020. Nutritional-Landscape Models Link Habitat Use to Condition of Mule Deer (Odocoileus hemionus). Frontiers in Ecology and Evolution. 8: 1076-
. https://doi.org/10.3389/fevo.2020.00098(link is external).

Spitz, Derek B.; Clark, Darren A.; Wisdom, Michael J.; Rowland, Mary M.; Johnson, Bruce K.; Long, Ryan A.; Levi, Taal. 2018. Fire history influences large-herbivore behavior at circadian, seasonal, and successional scales. Ecological Applications. 28(8): 2082-2091. https://doi.org/10.1002/eap.1797.

Additional citations to consider for elk security management:

- Lowrey, B., Devoe, J., Proffitt, K.M. and Garrott, R.A. (2020), Hiding Without Cover? Defining Elk Security in a Beetle-Killed Forest. Jour. Wild. Mgmt., 84: 138-149. https://doi.org/10.1002/jwmg.21781
- Rowland, M.M., M.J. Wisdom, B.K. Johnson, and J.G. Kie. 2000. Elk distribution and modeling in relation to roads. The Journal of Wildlife Management, pp.672-684.
- Rowland, M.M., M.J. Wisdom, B.K. Johnson, and M.A Penninger. 2004. Effects of roads on elk: implications for management in forested ecosystems. In: Transactions of the 69th North American Wildlife and Natural Resources Conference: 491-508.
- McCorquodale, S.M., 2013. A brief review of the scientific literature on elk, roads, and traffic. Washington Department of Fish and Wildlife, Olympia, USA.
- Wisdom, M.J., H.K. Preisler, L. Naylor, R.G. Anthony, B.K. Johnson, M.M. Rowland. 2018. Elk responses to trail-based recreation on public forests. Forest Ecology and Management 411:223-233.
- Miller, Anna B.; King, David; Rowland, Mary; Chapman, Joshua; Tomosy, Monica; Liang, Christina; Abelson, Eric S.; Truex, Richard L. 2020. Sustaining wildlife with recreation on public lands: a synthesis of research findings, management practices, and research needs. Gen. Tech. Rep. PNW-GTR-993. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 226 p.

Bill Richardson | Senior Conservation Program Manager - Western
24550 Ervin Road | Philomath, OR 97370 | (541) 929-3011 | brichardson@rmef.org

5705 Grant Creek Rd. | Missoula, MT 59808-8249 | (800) CALL ELK | WWW.RMEF.ORG