



**ROCKY MOUNTAIN
ELK FOUNDATION**

September 6, 2022

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Paulina Ranger District
Ochoco National Forest
3160 NE 3rd Street
Prineville, OR 97754

Email: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=61651>

Subject: Scoping Comments - North Fork Crooked River Forest Resilience Project

The purpose of this letter is to state the Rocky Mountain Elk Foundation's (RMEF) strong support of the proposed North Fork Crooked River Forest Resilience Project and the active forest management it will provide. RMEF concurs with the stated purpose and need for this project.

RMEF is pleased to note the Agency's acknowledgement of the need to enhance elk and deer forage, their security and to reduce human disturbance of them. Elk hiding cover and security areas should be analyzed and mitigation measures provided in the project design to enhance hiding cover and security area.

The south boundary of the project area abuts private land where an influx of elk and deer could become problematic. RMEF suggests project implementation be designed to mitigate displacement of big game to the adjacent private land while maintaining access connectivity to other public lands.

Both elk and mule deer are identified as management indicator species in the Ochoco National Forest's Land and Resources Management Plan (LRMP). The LRMP provides standards and guidelines for elk and deer habitat management and RMEF anticipates this guidance will be implemented in this project. It should be noted that mule deer are in decline in the project area, the state, and the region; collaboration with Oregon's Department of Fish and Wildlife (ODFW) could be helpful to habitat enhancement incidental to project design. Pronghorn, a big game animal, are present in the scablands area of this project and deserve address in the project's analysis.

Additional comments:

1. Remove all encroaching conifers from aspen, meadows, and riparian zones.
2. With respect to aspen enhancement, consult PNW-GTR-806, Aspen Biology, Community Classification, and Management in the Blue Mountains.
3. Remove off-site encroaching western juniper to reduce depletion of soil moisture.
4. Protect and develop any spring encountered.

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5. Protect and rehabilitate any wildlife watering guzzler in the project area.
6. Protect Mt Mahogany and bitterbrush from injury by prescribed fire.
7. Scabland incidentally burned by escaped prescribed fire should be seeded to a mix of native perennial forage species mixed with an annual species to serve as a nurse crop for the native species. This action will be helpful in combating invasion of Cheatgrass, medusahead rye, and the like.
8. Invasive weeds - Include in the project direct action to eradicate known areas of non-native invasive vegetation and include in the project plan measures to reduce infection of the project during project operations.
9. Seed disturbed soil with a native forage species seed mix – skid trails, landings, decommissioned roads – to provide additional forage and reduce soil erosion.
10. Open close coordination and collaboration with ODFW's District Wildlife and Fish Biologists in Prineville, Oregon.

Thank you for the opportunity to submit scoping comments for the proposed North Fork Crooked River Forest Resilience Project.

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