



**ROCKY MOUNTAIN
ELK FOUNDATION**

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Beth Peer,
Environmental Coordinator,
Ochoco National Forest,
3160 NE 3rd Street,
Prineville, OR 97754

E-mail: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=58831>

Subject: Comments – Lemon Gulch Trails Project Draft Environmental Assessment (EA)

The purpose of this letter is to state the Rocky Mountain Elk Foundation (RMEF) does not support the Lemon Gulch Trails Project and recommends selection of the No Action Alternative. RMEF does not concur with the Draft EA's stated need for the project or support any of the proposed action alternatives.

Based upon the information presented in the Draft EA and its supporting Wildlife Resources Report (WR), listed below, RMEF concludes there is sufficient reason to expect the elk and deer present in the area will be very adversely impacted by the mountain bike trail construction, utilization, and maintenance.

- All action alternatives propose to increase trail miles and density which would increase human disturbance and adversely impact deer and elk use of the area. (Draft EA, p 44)
- Human disturbance will cause the elk and deer in the project area to vacate to adjacent land both public and private. (Draft EA, p 44)
- Displacement to private land may well be problematic. (WR, p 9)
- Citations are presented indicating human road and trail disturbance of elk and deer by mountain biking, hiking, equestrian, etc. causes them to displace long distances from habitat of their choosing. (Draft EA, p 54)
- The overall direct, indirect, and cumulative effects for the action alternatives would result in a negative trend for some habitat variables for elk and deer, (Draft EA, p 57) (Draft EA, p 61)
- A core habitat analysis was conducted for the project area which shows the level of adverse impact to wildlife habitat due to fragmentation and disturbance (Wildlife Report Appendix B) (Draft EA, p 67)
- The adverse displacement of elk and deer can be expected to persist as long as the trails remain open and available to the public for use. (Draft EA, p63) (WR, p 8)

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

- A distance band analysis of the project area for Elk Security habitat found it be currently almost non-existent. (WR, p xi) (Draft EA, p 55)
- Elk avoid non-motorized trail-based recreation, similarly to their avoidance of roads open to motorized routes and avoidance is a form of habitat loss. (WR, p xii)
- The Lemon Creek Project is within the Oregon Department of Fish and Wildlife's (ODFW) Grizzly Wildlife Management Unit. Elk and mule deer populations in the grizzly Unit are well below ODFW management objectives. (Draft EA, p53) (WR, p xv)

The Ochoco NF Land and Resources Management Plan (LRMP) makes two statements germane to our position.

1. "ORV use, and trail construction and reconstruction, will be allowed where they are not in conflict with other resource objectives." (LRMP 4-23) RMEF believes the Draft EA clearly indicates a conflict with the wildlife resource and on this basis Lemon Gulch Trails Project should not proceed further.
2. "Provide forage sufficient to meet management objectives for population levels of Rocky Mountain elk and mule deer." (LRMP 4-246) RMEF's believes the proposed project is antithetical to the LRMP in that the Draft EA shows the proposed project will displace the elk and deer from their chosen habitat therefore it does not support the LRMP. Again, the project should proceed no further.

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 submit comments on Draft EA for the Lemon Gulch Trail Project.

Sincerely,



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