



Oregon

Tina Kotek., Governor

Department of Fish and Wildlife

John Day Watershed District Office

73471 Mytinger Lane

Pendleton, OR 97801

Voice (541) 276 2344

FAX (541) 276 4414

www.dfw.state.or.us/

February 15, 2023

U.S. Forest Service
Attn: Aaron Gagnon
1415 W Rose Street
Walla Walla, WA 99362



Dear Mr. Gagnon:

This letter is regarding the request for scoping comments on the proposed Tiger Mill project. The Oregon Department of Fish and Wildlife (ODFW) understands the need and desire to complete vegetation management in the project area to reduce the risk of high severity wildfire and address the impacts of fire suppression activities over the last 100 years. The proposed project area includes summer range and winter range for both mule deer and Rocky Mountain elk. The low density of roads within the project area provides great security areas for elk, but forage for elk and mule deer is lacking due to long term fire suppression. In addition to big game habitat concerns, ODFW has identified species of greatest conservation need that are known to occupy the Tiger Mill project area. These species are listed within the Oregon Conservation Strategy (OCS) as having small, declining, or at-risk populations within the state. ODFW is supportive of the Tiger Mill project and recognizes the potential benefits it will provide for big game and non-game species habitats. Although ODFW is supportive of the project, we ask that some of the treatments in the project area are more specifically targeted to increase forage for mule deer and that the project planning consider impacts to species listed within the OCS.

Mule deer throughout eastern Oregon have seen rapid declines over the last 40 years. The population has been declining from a peak of around 306,000 animals in 1981 to the most recent estimate of 162,600 in 2022. Research at the Starkey Experimental Forest has shown that nutritional limitations are likely contributing to ongoing mule deer population declines. At Starkey in particular, energetic demands of lactating females are not being met by available forage. Summer range forage conditions for mule deer in forested areas are less than ideal and fire suppression has contributed to the decline of available forage. Preliminary proposed actions of the Tiger Mill project should benefit mule deer, but ODFW recommends that more specific prescriptions are incorporated into the proposed actions to benefit mule deer through increased forage production.

Research in Southeast Oregon has shown that forest management prescriptions that maintain 40% canopy cover and create forest edge habitats increase

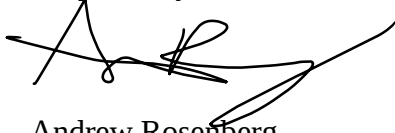
probability of use by mule deer within summer habitat. These prescriptions are particularly beneficial when implemented on areas with gentle slopes near streams and riparian areas, decreasing energy expenditure of female mule deer during months that are resource limited (Eckrich et al. 2020). ODFW recommends that some of the treatments include prescriptions targeting around 40% canopy cover and that these treatments are completed in areas with more gentle slopes and/or near riparian areas.

Additionally, ODFW recommends that temporary roads scheduled to be decommissioned at the end of the project are closed with physical barriers or road scarification in addition to road closure signs. Physical barriers are more effective at preventing motorized access to closed areas and are easier to enforce.

The OCS lists three species that have been observed within the Tiger Mill project area that are not federally threatened or endangered and do not occur within the Umatilla National Forest focal or surrogate species list. These include the Great Gray Owl, Olive-sided Flycatcher, and the Three-toed Woodpecker. Specific conservation actions that benefit each of these species include the retention of snags for nesting and foraging, and the presence of downed woody material to promote an abundance of prey. Conservation actions that benefit the Great Gray Owl include creation of grassy meadows in late successional stands for hunting and foraging habitat. Olive-sided Flycatcher's benefit from open forest for aerial maneuvering while foraging, and the three-toed woodpecker benefits from the retention of recently dead and dying trees from burns or disease. ODFW requests that the habitat needs and potential impacts to these species are considered during project planning and implementation.

I appreciate the opportunity to comment on the proposed project and look forward to working with the Forest Service to implement this project and improve wildlife habitat in the Tiger Mill project area. Please feel free to call me at (541) 276-2344 if you have any questions regarding my comments.

Respectfully,

A handwritten signature in black ink, appearing to read 'Andrew Rosenberg', with a long horizontal stroke extending to the right.

Andrew Rosenberg
Acting District Wildlife Biologist
Umatilla District

