



**ROCKY MOUNTAIN
ELK FOUNDATION**

March 28, 2023

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E-mail: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=58961>

Subject: Scoping Comments - Morgan Nesbit Forest Resiliency Project

The purpose of this letter is to state that the Rocky Mountain Elk Foundation (RMEF) strongly supports the Morgan Nesbit Forest Resiliency Project and the active forest management it proposes. RMEF concurs fully with the stated Need and Purpose for the project.

RMEF is very pleased to see the goal statement for the project clearly states, “maintain and enhance wildlife habitat and quality”, including provision of wildlife habitat connectivity. (MN Notice, p 2, 3) Also, RMEF is happy to see the project proposes to include enhancement of aspen stands and meadows. We are confident the project active forest management will produce major increases in forage quantity and quality.

Both Rocky Mountain Elk and Mule Deer are designated management indicator species in the Wallowa Whitman Forest Land and Resource Plan (FLRP) and the plan contains Standards and Guidelines in support of the two species habitat. RMEF expects this FLRP direction will be adhered to in the execution of this project.

RMEF’s scoping comments are:

1. Security cover for elk and deer – In the variable density marking rules created for the project please include security cover near open roads, created gaps, and adjacent regeneration harvest units.
2. Temp road decommissioning – Consider sub-soil ripping decommissioned roads before seeding to native forage mix.
3. Seeding disturbed soil – Seed all disturbed soil with a native species forage seed mix of high nutrient value for big game, i.e., skid trails, landings and decommissioned roads.

4. Plan to repair gates and barricading of the existing closed roads. These actions will increase wildlife security by reducing disturbance.
5. Aspen enhancement – RMEF strongly encourages aspen enhancement projects to be based upon the information in PNW-GTR-806, Aspen Biology, Community Classification, and Management in the Blue Mountains. (Swanson et al, 2010) One of the tenants in GTR-806 is immediate installation of protective fencing around all aspen enhancement sites because the suckering sprouts are very quickly eaten by both livestock and big game.
6. Mule Deer – Please include enhancement of Mule Deer forage habitat in the project's analysis. The Mule deer population within the project area is below Oregon Department of Fish and Wildlife's (ODFW) management objective. The Mule Deer population is in decline in Oregon and throughout its range across the western USA. The Forest Service can easily and at low cost perform mule deer habitat improvements within this project, forage/browse – quality and quantity and hiding/security cover. Two recent documents may be of assistance, both are published by the Western Assoc. of Fish and Wildlife Agencies, Habitat guidelines for Mule Deer, Intermountain West Ecoregion (Cox et al, 2009) and Range-wide guidelines for seeding mule deer and black-tail deer habitat. (Summers et al, 2022)
7. ODFW Collaboration – RMEF encourages the Forest Service collaboration with the ODFW's Grand Ronde Watershed Habitat Wildlife Biologist who is headquartered in La Grande, Oregon.

When it comes time to implement project treatments related to wildlife habitat enhancement, consider partnering with the RMEF and or the Blue Mountains Elk Initiative, both of which can make funding available through their habitat project grant programs.

RMEF strongly supports the Morgan Nesbit 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 submit scoping comments for this project.

Sincerely,



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

Citations:

Swanson, David K.; Schmitt, Craig L.; Shirley, Diane M.; Erickson, Vicky; Schuetz, Kenneth J.; Tatum, Michael L.; Powell, David C. 2010. Aspen biology, community classification, and management in the Blue Mountains. Gen. Tech. Rep. PNW-GTR-806. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station.

Cox, M., D. W. Lutz, T. Wasley, M. Fleming, B. B. Compton, T. Keegan, D. Stroud, S. Kilpatrick, K. Gray, J. Carlson, L. Carpenter, K. Urquhart, B. Johnson, and C. McLaughlin. 2009. Habitat Guidelines for Mule Deer: Intermountain West Ecoregion. Mule Deer Working Group, Western Association of Fish and Wildlife Agencies

Summers, D. D., K. L. Gunnell, A. D. Green, C. Payne, S. A. Green, C. D. Jones, and J. L. Vernon. 2022. Range-wide guidelines for seeding mule deer and black-tailed deer habitat. Mule Deer Working Group, Western Association of Fish and Wildlife Agencies, Boise, Idaho, USA.