



Oregon

Tina Kotek, Governor

Department of Fish & Wildlife

East Region

107 20th Street

La Grande, Oregon, 97850

(541)963-2138

Fax (541)963-6670

September 5, 2023

Kendall Cikanek
Whitman Ranger District
1550 Dewey Avenue, Suite A
Baker City, Oregon 97814

Dear Mr. Cikanek-

The Oregon Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the proposed **Clarks Integrated Vegetation Management Project (Clarks)**. The proposed project is of particular importance to the Department as it promotes active forest management with a goal of improving forest health, increasing resiliency to disturbance, and reducing the risk of high intensity fire. The identified active forest management activities will help enhance wildlife habitats by promoting early seral plant communities, ultimately improving forage quantity and quality; restore riparian function and hardwood vegetation communities; and improve wildlife connectivity throughout the 42,610 project area.

In general, the Department supports the proposed project and encourages the Whitman Ranger District to use this opportunity to address wildlife needs and habitat limiting factors within the project area. Our recommendations follow:

- The Oregon Conservation Strategy identifies aspen woodlands as a strategy habitat for the Blue Mountains Ecoregion. The Department supports increasing aspen recruitment and distribution, including creating conditions favorable for other early seral vegetation development on the landscape, to reduce browse pressure and intensity on aspen stands that have been identified within the project area. Limiting factors for aspen woodlands in the ecoregion are evident within the project area, which include altered historic fire regime and intensive grazing pressure by ungulates. The Department recommends promoting the health and vigor of aspen stands in the ecoregion with larger landscape scale projects.
- The proposed project has the potential to impact elk security on public lands and can help the Department in addressing elk distribution issues. The Department has concerns with current elk security habitat levels and open road densities within the proposed project area. As identified in the 1990 Forest Plan, Management Area (MA) 3 Wildlife Timber Winter Range has a Forest Plan Standard of a maximum of 1.5

miles/square mile of open road densities and MA 1 Timber Production Emphasis has a Forest Plan Standard of a maximum of 2.5 miles/square mile of open road densities. The Department requests an accurate assessment of open road densities within the project area and a current map of elk security habitat within the project area. Any opportunities to enhance elk security or incorporate additional security areas should be encouraged. Minimizing motorized disturbance to deer and elk that utilize the area will be key in project design and implementation to allow for maximum utilization of available habitat and enhanced forage conditions.

- Temporarily roads have been identified for construction to help facilitate with project implementation. The Department supports these roads being decommissioned following restoration activities. Decommissioning efforts must include putting the roadbed back into its natural state, as well as the incorporation of an appropriate wildlife friendly seed mix and post project noxious weed control program to ensure noxious weed populations are appropriately treated and monitored. It would also be advantageous to incorporate a physical barrier (i.e. earthen berm or boulder placement) at entry points to discourage future motorized use.
- In terms of currently closed roads that will be re-opened for project activities, the Department would like to see these roads remain closed to the motorized use by public and only open for administrative use relating to project implementation efforts. Following project activities, these roads systems should be closed with the most effective means possible (i.e. gates, earthen berms, boulders) and promulgated with a CFR closure to allow for adequate enforcement measures.

Thank you again for the opportunity to provide comments on this important project. These opportunities are essential in supporting a cooperative working relationship that benefits wildlife and the habitats that they depend on. If you have any questions or comments regarding this letter, please feel free to contact me at the ODFW East Region Office in La Grande at (541)962-1838.

Sincerely,



Jon Paustian

Oregon Department of Fish and Wildlife

Grande Ronde Watershed Habitat Biologist

107 20th Street, La Grande, Oregon 97850

jon.a.paustian@odfw.oregon.gov