



**ROCKY MOUNTAIN  
ELK FOUNDATION**

September 11, 2023

Kendall Cikanek, District Ranger  
Whitman Ranger District  
Wallowa-Whitman National Forest  
1550 Dewey Ave, Suite A  
Baker City, OR 97814

E-mail: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64450>

Subject: Scoping Comments – Clarks Integrated Vegetation Management Project  
(aka Clarks Fuels Management Project)

The purpose of this letter is to state the Rocky Mountain Elk Foundation's (RMEF) strong support for Clarks Integrated Vegetation Management Project. RMEF concurs fully with the purpose and need for the project and the suite of proposed silvicultural treatments.

Our scoping comments are:

1. RMEF is concerned that the recent US District Court decision regarding prohibition of harvest for trees greater than 21 inch in diameter at breast height will cripple the Agency's ability to achieve its stated Purpose and Need and stand management objectives.
2. We are pleased to note the Agency identified the need to increase the structural complexity of the vegetation and species diversity in the project area to provide habitat for a wider variety of wildlife.
3. RMEF suggests that big game security and displacement be carefully considered, and project implementation included measures to mitigate displacement of the big game to nearby private lands where their presence will become problematic.
4. RMEF recommends full consideration and analysis of the project's opportunity to enhance Mule deer habitat, particularly forage habitat. Mule deer are below Oregon Department of Fish and Wildlife's (ODFW) management objective for the project area. It should be possible to enhance the mule forage/browse with little or no extra effort. A good reference on the subject is Habitat Guidelines For Mule Deer – Intermountain West Ecoregion ( [https://wafwa.org/wp-content/uploads/2020/08/HabitatGuidelines\\_MuleDeer\\_IMW.pdf](https://wafwa.org/wp-content/uploads/2020/08/HabitatGuidelines_MuleDeer_IMW.pdf) ).
5. RMEF recommends consideration of reducing stand crown closure to near 35% or below to provide adequate sunlight reaching the forest floor to stimulate grass, forbs and shrubs thus enhancing wildlife forage and browse. This could be

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accomplished using the variable density thinning technique leaving untreated patches for security and installing gaps of 1 - 3 acres.

6. With respect to the proposed application of prescribed fire, RMEF suggests careful analysis of its impacts, particularly as pertains to repeated application of fire which research indicates has the potential to remove the shrub understory and convert to grass domination.
7. Communication and collaboration with the ODFW District Wildlife Biologist in Baker City, Oregon, regarding the Clarks Project is strongly encouraged.

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 provide scoping comments on this project.

Sincerely,



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