



**ROCKY MOUNTAIN
ELK FOUNDATION**

September 13, 2023

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Lookout Mountain Ranger District
Ochoco National Forest
3160 NE 3rd Street
Prineville, OR 97754

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=58081>

Subject: Comments – Mill Cr. Dry Forest Restoration Project Draft EA

The purpose of this letter is to state the Rocky Mountain Elk Foundation supports this project. The Elk Foundation concurs with the Forest Service's stated Purpose and Needs for the project and recommends implementation of Action Alternative 3 with modification to include treatments from Alt 4 proposing treatments in forest types and conditions which enhance big game forage and cover. Alternative 3 quite simply provides more of "needs" articulated in the draft's Purpose and Need statement than do either Alt. 2 or Alt. 4. (Draft EA, page 11-14)

Our additional comments are:

1. RMEF is pleased to note the forest Service recognized Big Game Habitat as Key Issue #3 for this analysis. (Draft, page 8)
 - All alternatives include implementation of previously authorized but unimplemented road travel restrictions that will enhance big game security.
 - In all alternatives the thinning prescriptions are modified from surrounding stands to meet Screens standard.
 - Common to all action Alternatives are project design criteria protecting elk wallows, calving and fawning areas, and activities in designated winter range.
2. RMEF suggests the EA consider taking actions to enhance mule deer forage habitat within the project area. The Mule Deer population in the project area is acknowledged to be below Management objective. The Ochoco's Land and Resource Management Plan designates the Mule deer a Management Indicator Species and thus should be accorded a thorough impact analysis and consideration. (Draft, page 121)
3. RMEF suggests design criteria to protect mountain mahogany and bitterbrush from damage during prescribed fire treatments be included in the EA. Upland shrub species that provide forage for big game such as mountain mahogany,

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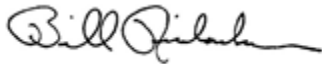
ceanothus, upland willow and bitterbrush do not occur in large numbers within the project area. (Wildlife Report, page 26) Because these critical forage species are in short supply in the project area they should to be accorded protection and enhancement.

4. RMEF strongly suggest increasing the detail of elk security analysis by including the analysis documented in the Wildlife Report, Appendix E.
5. In the Draft EA Core-habitat analysis as it relates to big game animals needs to be developed in detail and citation(s) provided.
6. RMEF suggests, regarding this project, the Forest Service establish a strong collaborative relationship with the Oregon Department of Fish and Wildlife's District Wildlife Biologist in Prineville, Oregon. ODFW is currently drafting a new mule deer management plan giving special emphasis to Mule deer management and habitat enhancement is number one on their list.

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 comments on this project.

Sincerely,



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