



**ROCKY MOUNTAIN
ELK FOUNDATION**

January 10, 2024

Joshua Giles, District Ranger
Attn: Boundary Project
Emigrant Creek Ranger District
Malheur National Forest
265 Hwy 20 South
Hines, Oregon 97738

E-mail: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=61912>

Subject: Scoping Comments – Boundary Project

The Rocky Mountain Elk Foundation (RMEF) strongly supports the Boundary Project and the active forest management treatments it proposes. RMEF fully concurs with the Scoping document's stated purpose and need for the Boundary Project.

RMEF is pleased to note that two of the purposes for the project are: 1) restoration of meadows and enhancement of Mt mahogany, and 2) enhancement of sagebrush steppe and upland shrubs. Targeting these two habitats will enhance big game forage and browse.

The early seral vegetation type is the most wildlife species rich of all the vegetation types and RMEF is happy to see Boundary project proposes more than 1100 acres of commercial regeneration/early seral habitat enhancement treatment. Early seral type is critical wildlife forage and browse habitat.

RMEF fully supports the Forest Service proposal to amend the Forest Plans to allow the use of prescribed fire and certain silvicultural treatments in Designated Old-Growth Forest. The amendment is necessary to attain the Purpose and Need for the project.

RMEF recommends the Forest Service collaborate with the District Wildlife Biologist, Oregon Department of Fish and Wildlife, Hines, Oregon, regarding the wildlife enhancing opportunities and mitigation of adverse impacts of the project.

Additional Comments:

1. With respect to Mt Mahogany, RMEF suggest reconsideration of allowing prescribed fire to back into Mt Mahogany patches. The shrub is both critically important browse, very rare and easily damaged by fire.
2. Consider removing all dwarf mistletoe infected overstory trees to stop or at least slow infection of the understory trees.

3. Plan to manage timing of silvicultural treatments to reduce displacement of deer and elk from the National Forest to private lands where they may become problematic.
4. Mule deer are in decline throughout their range and in the project area too. Identify and implement Mule deer specific enhancement actions which may be taken incidental to the proposed silvicultural treatments.

The Rocky Mountain Elk Foundation strongly supports this 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 comment.

Sincerely,



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