



**ROCKY MOUNTAIN
ELK FOUNDATION**

January 22, 2024

Hilary Henry, District Planner
Sweet Home District
Willamette National Forest
4431 Highway 20
Sweet Home, OR 97386

E-mail: <https://cara.ecosystem-management.org/Public//CommentInput?Project=64261>

Subject: Scoping Comments – Upper Canyon Project

The Rocky Mountain Elk Foundation (RMEF) strongly supports the Upper Canyon project and the active forest management it proposes. RMEF concurs with the Forest Service's stated "Needs" for the project, however RMEF recommends addition of "Restoration of early seral stage vegetation to a prevalence within its historical range" to be a stated need for the project.

Early seral stage vegetation has the largest number wildlife species obligates of all the seral stages. It is critical foraging and browsing habitat for wildlife, including deer and elk. A cursory review of satellite imagery showing the proposed Upper Canyon project area reveals the early seral stage vegetation type is likely in critically short supply and below HRV within the project area.

The Upper Canyon project is located within the Oregon Department of Fish and Wildlife's (ODFW) McKenzie Wildlife Management Unit (WMU). The ODFW website shows as of 2022 the estimated elk population in the McKenzie WMU has declined to 1932 which is well below the Management Objective population of 5000. For 2023 the estimated elk population is 1947, 38% of MO. (ODFW Unpublished) ODFW has no MO for Black-tail deer, however it is generally accepted that the population is well below historical.

RMEF suggests the Upper Canyon project provides an outstanding opportunity for enhancing needed wildlife habitat enhancement incidental to accomplishing the other stated needs for the project.

The Willamette National Forest's (WNF) Land and Resource Management Plan provides the policy (LRMP II-7) and forest-wide standard FW-121 (LRMP p IV-65) states habitat of Management Indicator Species will be managed in cooperation with the state fish and wildlife agency, ODFW.

The WNF LRMP designates elk and deer as management indicator species. (LRMP p IV-16)

The WNF LRMP includes a map showing designated Big Game Emphasis (BGE) Areas (High, Medium, Low and Winter Range). The BGE map shows the Upper Canyon project area to be within BGE high, medium, and winter range.

The LRMP provides Standards and Guides for habitat management specific to each classification of BGE area, FW-135 through FW-153. (LRMP p 67-70)

Additional comments:

1. Consider thinning down to a crown closure of 35 percent or lower to provide maximum amount of solar radiation to reach forest and stimulate growth of the understory.
2. Skips may well be unnecessary because of untreated adjacent stand condition and the relatively small size of the treatment units.
3. Suggest gaps be 2 to 3 acres in size and placed away from open roads,
4. Analyze action alternatives for elk impact using the Westside Elk Nutrition and Utilization Model which was identified as best science by the PNW Regional Forester in February 2013.
5. RMEF is very pleased to note the 37 acres of meadow enhancement and suggests more is needed. Meadow habitat in the west slope of the Cascade is relatively rare and thus of high value to wildlife.
6. Suggest seeding all soil disturbed by treatment operations with a forage mix of native grasses and forbs of high nutrient value to elk and deer, i.e. skid trails, log landings, decommissioned roads, and closed roads.
7. Ensure the Upper Canyon project is fully compliant with Presidential Executive Order 13443, dated August 16, 2007.
8. Invite the ODFW District Wildlife Biologist for the Corvallis District to collaborate with the Forest Service in development of the wildlife habitat enhancements the Upper Canyon project proposes to implement. (LRMP Standard FW -121 p IV-65)

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,

A handwritten signature in black ink, appearing to read "Bill Richardson", with a stylized, flowing script.

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