



OREGON HUNTERS ASSOCIATION

Protecting Oregon's Wildlife, Habitat and Hunting Heritage

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RE: Northwest Forest Plan Amendment Scoping Comments from the Oregon Hunters Association

The Oregon Hunters Association (OHA) is a sportsmen's conservation organization with over 11,000 members in 26 chapters across Oregon. OHA values our National Forests as a public place to hunt and recreate, and as a valuable asset providing habitat for the wildlife we care about. As such, the management and access of these lands are of critical importance to OHA. We have been engaged in numerous projects to improve and protect habitat conditions, and we value our partnership with the U.S. Forest Service (USFS). We are providing comments and input on the Northwest Forest Plan Amendment (NWFP).

OHA agrees with the need for an amendment to the NWFP. The Bioregional Assessment (July 2020) properly identifies that "neither the goal to maintain a viable timber industry to sustain rural communities and economies nor the goal to recover habitat for the northern spotted owl has been achieved" under the current NWFP. Further, the current implementation of the NWFP has had additional, perhaps unintended, consequences.

Amendment Focus Areas

The amendment focus areas are limited to five broad categories. OHA has input on the focus areas but, as the Bioregional Assessment (BioA) points out, there are additional factors that deserve consideration.

- *Fire Resistance and Climate Resilience: Adapting the NWFP landscape to enhanced fire resilience and climate change adaptability, leveraging recent data and predictive models.*

As the BioA points out, a lack of active management has produced conditions and fuel loads that are neither healthy for forest ecosystems or the communities in close proximity to these forests. Re-building fire resistance into these ecological systems need to be scaled to the geographic area. Effective wildfire-risk mitigation is needed but should be limited to those areas needed to protect the wildland-urban interface. Other active management practices need to consider ungulate forage components (bitterbrush, sagebrush) that serve as critical forage sources for species like mule deer.

- *Mature and Old-Growth Forest Management: Revising strategies for the conservation and sustainable use of mature and old-growth forests considering recent ecological studies and long-term forest health metrics. Adding relevant NWFP Area guidance in support of the planned Old-Growth amendment to all National Forest System unit land management plans.*

Use of adaptive management should be more strongly promoted and used. Current land allocation is limited to 5% for adaptive management. This type of management objective would be better served if adaptive management was used and implemented on at least 40% of the forest, creating habitat diversity across the landscape.

- *Community and Economic Considerations: Aligning timber and non-timber product supply strategies with community needs, environmental justice principles, and Tribal collaboration, reflecting the socio-economic dynamics influenced by forest management.*

Nearly every report, including the BioA identifies how the current NWFP has under delivered for rural communities and their economies. In the meantime, the amount of pressure put on our national forests from the recreational community has exploded.

Recommendation 10 in Chapter 2 of the BioA states “Land management plans in the BioA area should support sustainable recreation by better integrating resource and recreation management objectives”. OHA supports this recommendation.

- *Wildlife Habitat Protections: Updating habitat management approaches within the NWFP framework to incorporate new findings on species interactions and habitat requirements, particularly in mature and old-growth ecosystems.*

Habitat protection, enhancement and management should not be confined to mature and old-growth ecosystems. Public lands, particularly at this scale and size need to provide a diversity of forest conditions and habitat types. Under the current NWFP land allocation, 20% of the lands were to be managed as “matrix”. The NWFP has under delivered on this, and subsequently, much of the early and mid-seral habitats needed by a variety of species has either been reduced (in quantity and/or quality) or eliminated.

Focusing solely on late seral species has been a major factor in reducing population levels of Roosevelt elk on the west slope of the Cascade mountains and in southwestern Oregon. Elk management objectives established by the Oregon Department of Fish and Wildlife (ODFW) for areas that overlap the Mt. Hood, Willamette, Umpqua, and Rogue-Siskiyou National Forests all have Roosevelt elk populations at less than 50% of their respective management objectives (see attached graphic).

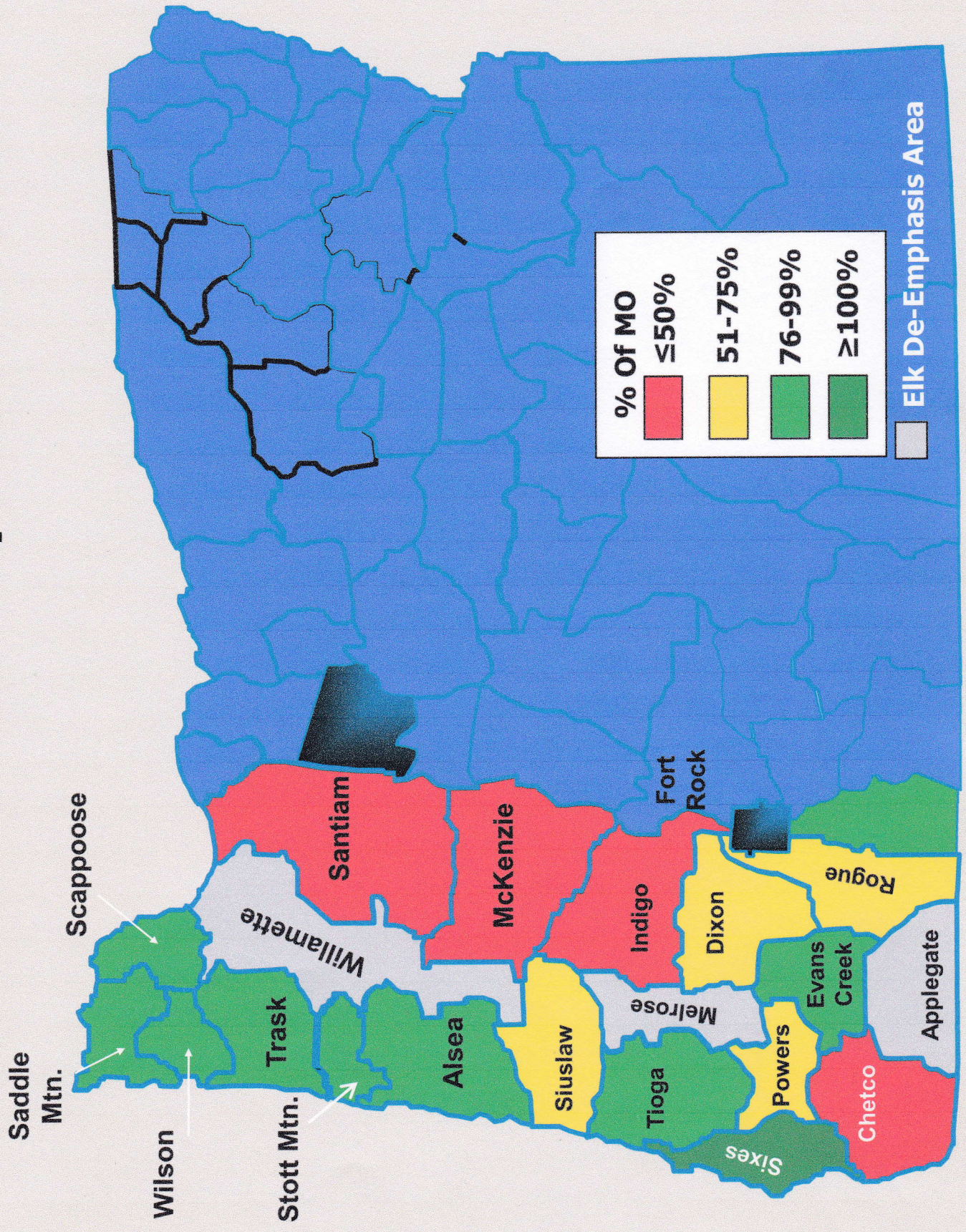
A lack of active management has also led to the reduction in quality summer range habitat for mule deer on the east slope of the Cascade mountains (see attached graphics). ODFW is currently updating and revising their mule deer management plan. The updated plan will show that nearly all of the mule deer herd ranges that overlap with national forests on the east slope of the Cascade Mountains are at medium to high levels of concern. Applying those factors in Recommendation 1 of Chapter 2 in the BioA, particularly for habitat connectivity and quality that are desperately needed for migrating mule deer.

Public lands are for all and should be managed for more than just late seral species. Biological diversity is critical to sustaining healthy ecosystems and provides a variety of social and economic values to people. Management options need to strive for a more balanced range of forest conditions to provide habitat and opportunities for more than old-growth and late seral species. Active management is needed as identified for everything from forest health, to seral stage development, to community and economic considerations.

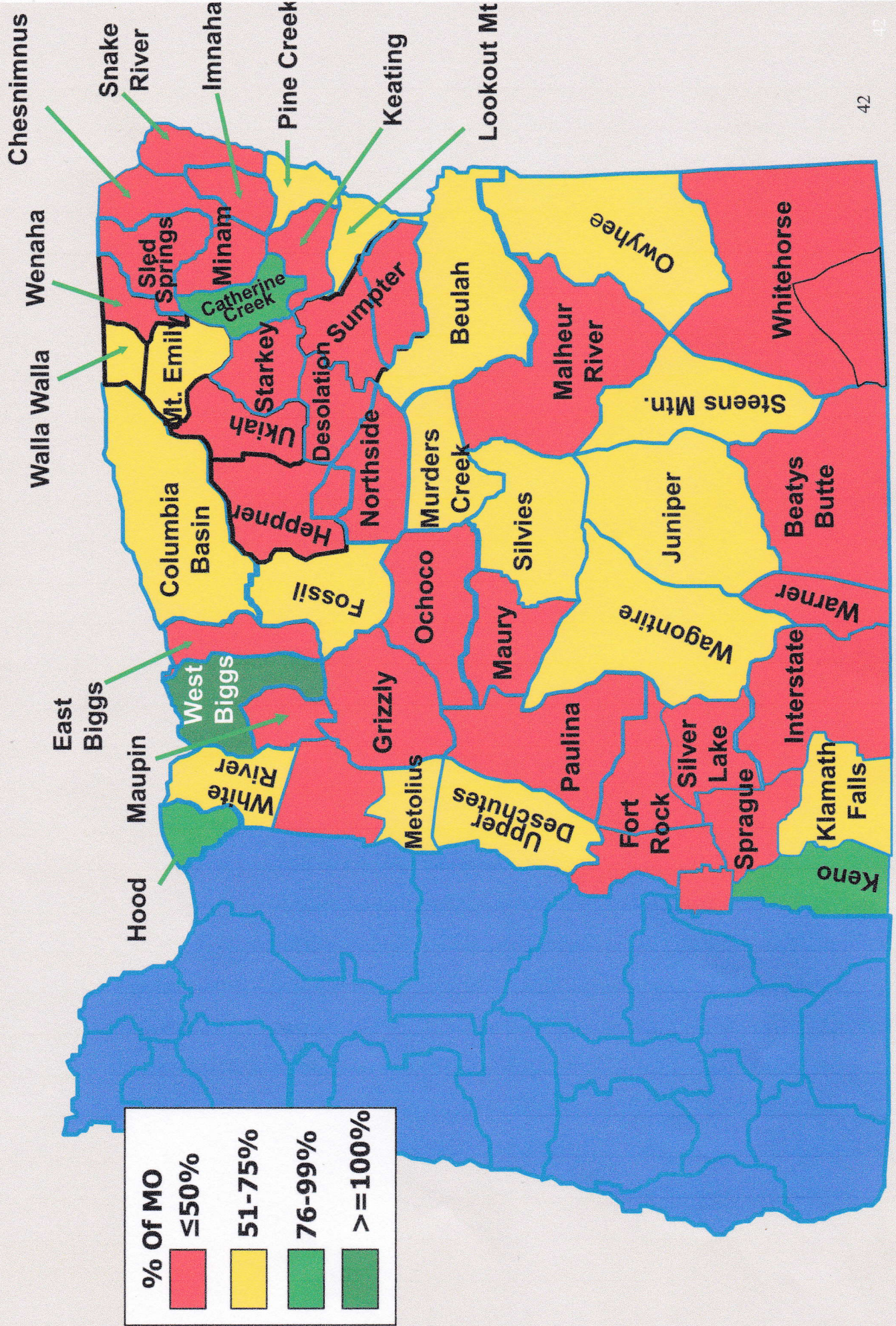
Thank you for the opportunity to comment.

Mike Totey
Conservation Director
Oregon Hunters Association

Roosevelt Elk Population MOs



Mule Deer Population Status



Mule Deer Population and Hunters

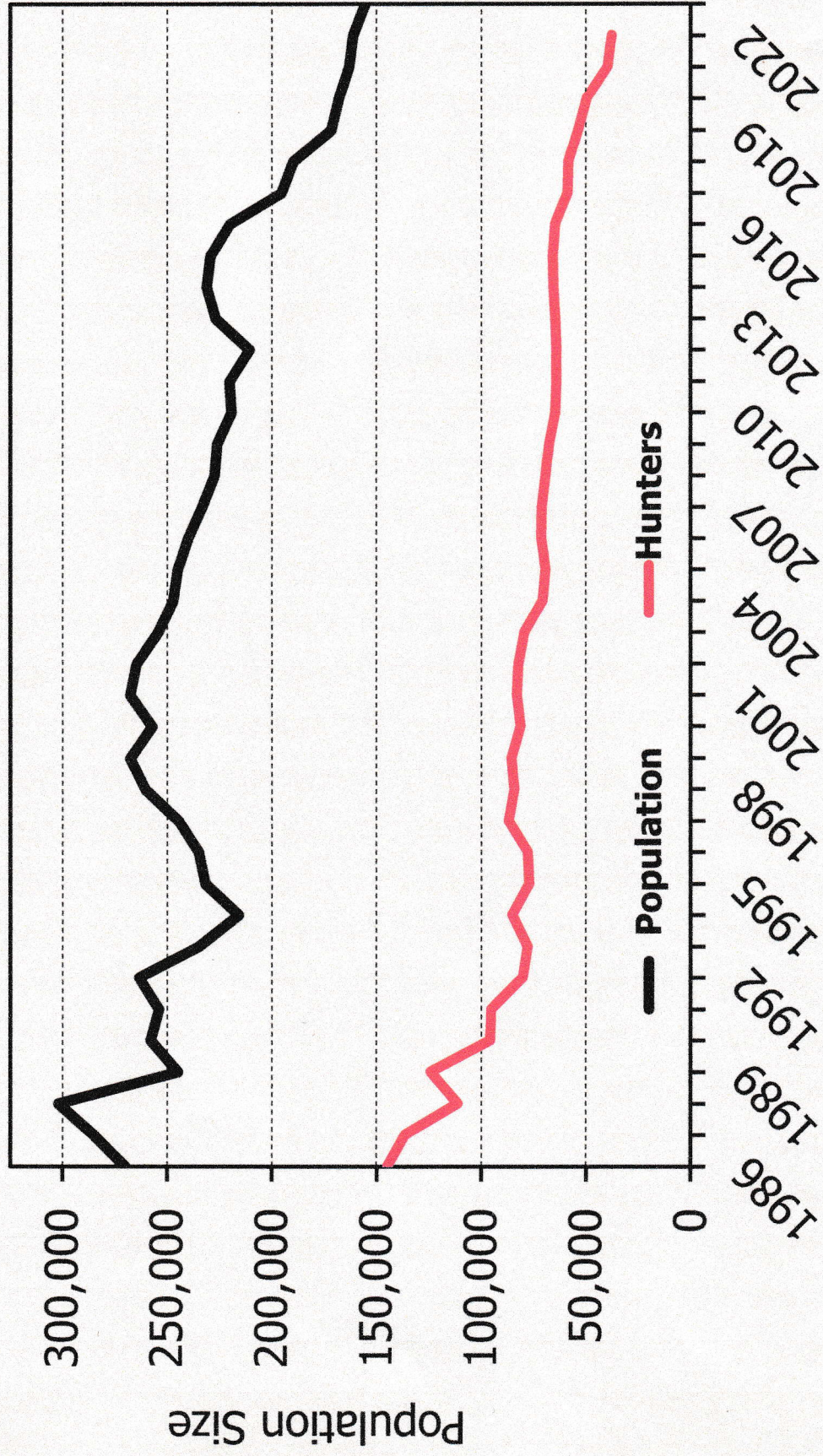


Figure A-1. Twenty-two final draft Herd Ranges juxtapositioned over eastern Oregon Wildlife Management Units (WMUs). Herd ranges developed from 1,454 radio-collared mule deer during winters 2005-2019 in eastern Oregon.

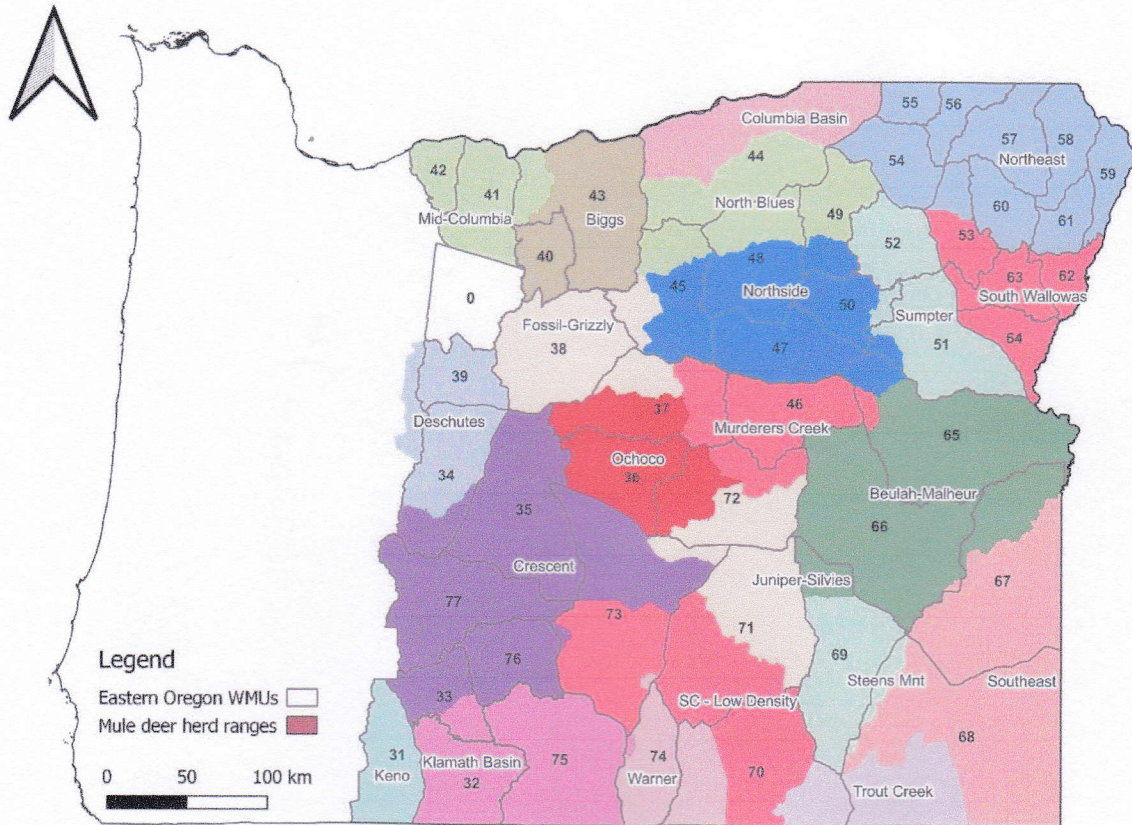


Table 1. Twenty-two mule deer herd ranges across eastern Oregon with 2022 population estimates developed from an Integrated Population Model (IPM), 5-year growth rates, 4 population and growth rate tiers, and overall scores (see management criteria inset above).

Herd Range	2022 Population	Average annual population change over 5-years	Population and Growth Rate Tiers				Pop. Tier	Growth Tier	Herd Range Concern Level
			Tier 1	Tier 2	Tier 3	Tier 4			
Beulah-Malhuer	11292	-7%	≤ 11333	11334 to 14167	14280 to 17000	>17000	1	1	High
Biggs	10392	1%	≤ 9666	9667 to 12083	12180 to 14500	>14500	2	3	Medium
Columbia Basin	4400	1%	≤ 3999	4000 to 5000	5040 to 6000	>6000	2	3	Medium
Crescent	10542	-10%	≤ 10667	10668 to 13333	13440 to 16000	>16000	1	1	High
Deschutes	6644	4%	≤ 6333	6334 to 7917	7980 to 9500	>9500	2	4	Less
Fossil-Grizzly	8737	2%	≤ 8333	8334 to 10417	10500 to 12500	>12500	2	3	Medium
Juniper-Silvies	3752	3%	≤ 3666	3667 to 4583	4620 to 5500	>5500	2	3	Medium
Keno	2485	-7%	≤ 2333	2334 to 2917	2940 to 3500	>3500	2	1	High
Klamath Basin	7684	-2%	≤ 7333	7334 to 9167	9240 to 11000	>11000	2	2	Medium
Mid-Columbia	10428	0%	≤ 10000	10001 to 12500	12600 to 15000	>15000	2	3	Medium
Murderers Creek	7157	-4%	≤ 7000	7001 to 8750	8820 to 10500	>10500	2	1	High
North Blues	17206	-2%	≤ 16667	16668 to 20833	21000 to 25000	>25000	2	2	Medium
Northeast	17397	0%	≤ 16667	16668 to 20833	21000 to 25000	>25000	2	3	Medium
Northside	18846	-4%	≤ 18001	18002 to 22500	22680 to 27000	>27000	2	1	High
Ochoco	7667	-3%	≤ 7333	7334 to 9167	9240 to 11000	>11000	2	1	High
SC Low Density	353	-3%	≤ 332	333 to 417	420 to 500	>500	2	2	Medium
South Wallowas	13532	1%	≤ 13000	13001 to 16250	16380 to 19500	>19500	2	3	Medium
Southeast	3063	2%	≤ 2999	3000 to 3750	3780 to 4500	>4500	2	3	Medium
Steens Mtn	3691	2%	≤ 2999	3000 to 3750	3780 to 4500	>4500	2	3	Medium
Sumpter	10462	0%	≤ 10000	10001 to 12500	12600 to 15000	>15000	2	2	Medium
Trout Creek	1190	-1%	≤ 1132	1133 to 1417	1428 to 1700	>1700	2	2	Medium
Warner	2683	-9%	≤ 2533	2534 to 3167	3192 to 3800	>3800	2	1	High

*Note all

estimates are preliminary and subject to change.