



**ROCKY MOUNTAIN
ELK FOUNDATION**

April 8, 2024

Slater Turner, District Ranger
Lookout Mountain RD and Crooked River NG
Ochoco National Forest
3160 NE 3rd Street
Prineville, OR 97754

E-mail: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=62771>

Subject: Comments – Corral Flats Endurance Trails Project Draft EA

The purpose of this letter is to transmit the Rocky Mountain Elk Foundation's (RMEF) comments regarding the Corral Flats Trails Project (the Project) Draft Environmental Assessment which was released for public review and comment.

It is our understanding that the intent of the Project is to formally bring into the Forest Service trail system 51 miles of user created equestrian trail which was created over a 25-year period under the authority of multiple special use permits. Alignment of existing trail is proposed to avoid further damage to meadow and soil resources. Also proposed are strengthening or restoration of closed road barricading and repair of environmental damage caused by unauthorized OHV use.

The Project is shown by the various maps in the DEA document to occupy, by our estimate, a contiguous area of approximately 61 square miles or 39,000 acres. (Fig. E-1, DEA p 73) The Project has a very large footprint on the landscape and its impact upon the native wildlife resource requires a more detailed analysis than has been provided in the Draft EA

Our review of the Project's draft environmental assessment has left us with the impression the Draft EA is scripted to support the selection of the one and only "Preferred" action alternative. We are concerned the analysis of Draft EA focuses only on the marginal difference between the permitted existing conditions and the proposed Project. We suggest the No Change alternative is in fact an action alternative because of its permitted nature and thus the totality of the impacts of both existing permitted condition and the proposed Project must be analyzed. Our review has also generated additional comments and recommendations which are appended to this letter.

Regarding the known ongoing non-trail related resource damage and closed road use violations referred to in the Draft EA; what is preventing the USFS initiating immediate

corrective action? Surely the USFS has the authority and the responsibility to act unrelated to this environmental assessment.

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, cursive script.

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

Attachment 1 – RMEF Comments - Corral Flats Equestrian Trails Draft EA

Page	Comment
6	Purpose and Need Statement. Comment: Revise. The Purpose is not a Need.
9	Alternatives Analyzed in Detail. Comment: Revise to provide a real No Action Alternative. Proposed NO Action/No Change Alternative is an Action Alternative as the trail system exists because of a decision by authority to issue a special use permit and needs to be analyzed as an action alternative. Only one Action Alternative analyzed. A NO Action Alternative needs to be defined. No statement of alternatives identified but eliminated from study and the reason why.
9	Proposed Action. Comment: Provide more information. A map is needed showing the existing trail system and the proposed system together on one page to make in clear what is proposed. A table showing miles of existing and proposed showing mileage, particularly decommissioned and new trail construction.
19	Wildlife, Methodology. Comment: ONF LRMP (USFS1989) specifies use of HEI (Thomas et al, 1988). An HEI analysis was not performed. An HEI analysis was not performed. However, HEI is no longer the best science. No alternative was proposed.
19	Wildlife, Methodology. Comment: Core Habitat Analysis needs a citation and an explanation of its value and importance to the analysis, Recommendation: Add citation
21	General Forest Winter Range (MA-F21). Comment: Need to reduce human disturbance in wintertime to protect wildlife from disturbance and thus energetic loss during the critical winter season. USFS Core Habitat analysis determined that the trail will adversely impact wildlife. Recommend winter closure of trail Dec 1 -May1 to protect wildlife.

22	<p>Management Indicator Species.</p> <p>USFS: “Therefore, proposed actions would not contribute to a negative trend in viability on the Ochoco National Forest for any MIS or associated habitat.”</p> <p>Comment: This statement that the project will not have negative (or minimal) effect on the NF wide basis is used in every project analysis. Surely when all are added together there will be an impact!</p>
23	<p>Migratory and Resident Land Birds.</p> <p>USFS: “Project activities will designate an existing trail system which occurs within or in close to proximity to multiple habitat types including dry forest, mesic mixed conifer, riparian woodland, and meadow Species of migratory and resident birds which utilize these habitats may be adversely impacted due to an increase in the overall level of disturbance within the area associated with use of the trail system.”</p> <p>Comment - The statement is in clear conflict with MIS determination on page 22 (See above) which states no negative impacts. How can trail activities ONLY impact birds and not deer, elk and other species? Recommend review and revision.</p>
23, 24	<p>Environmental Impacts, Potentially Affected Environment. USFS: “For many wildlife species, the high levels of human use which occur throughout most of the project area have diminished the ability for these areas to serve as effective reproductive habitat to some degree.”</p> <p>Comment - USFS acknowledges the 25-year existence of the roads and trails and that the disturbance from their use is degrading the habitat for all the species present. An explanation is needed of why use of the trails justified, or their adverse impacts of mitigated?</p>
25	<p>Potential for adverse changes in connectivity of habitat – Wildlife. USFS: “The construction and implementation of the proposed trails will adversely impact the connectivity of habitat for wildlife species within the proximity of the trail system.”</p> <p>Comment: Now the project is constructing a trail. A clear description and quantification of what work is proposed in the preferred Alternative is need. Same is true for the NO Change Alternative which is in fact an action alternative.</p> <p>USFS: “While the majority (approximately 60 % or 30 miles) of the proposed trail system falls within areas of existing disturbance (e.g., existing roads and trails) the remaining 40% or 20 miles traverses through blocks of unfragmented core habitat larger than 100 acres. The overall reduction in existing core habitat is approximately 1,263 acres or 10% of the existing core habitat present within close proximity to the trail system.</p> <p>Comment: Correct 10% to read 21%.</p> <p>USFS: “this trail system has been utilized consistently by equestrians for over 25 years and therefore while designating the trail does</p>

	<p>administratively change the amount of core habitat present on the landscape, the function of the area in general will not be significantly altered when compared to the existing condition. <i>Therefore, due to the amount and distribution of core habitat within the project area, the proportion of area impacted, and the current recreational use in the area the anticipated adverse impacts to core habitat are insignificant at the project.'</i></p> <p>Comment: Under Alt 2 Preferred. Arguably the smaller blocks of core habitat indicate reduced connectivity for at least some species. Consider revision.</p>
25	<p>Cumulative Effects</p> <p>USFS - Other projects would have both beneficial and adverse, but generally beneficial effects to wildlife.</p> <p>Comment: Concurrent projects are stated to be beneficial without disclosure of what the beneficial activities being described.</p> <p>Recommendation: Include more detail.</p> <p>USFS: "The Corral Flat trails project would contribute a negative trend in habitat suitability to the overall cumulative effects, however, as previously stated other projects occurring within and around the project area would beneficially contribute. The combined effect of the proposed action alternative from the Corral Flat project, with the current and reasonably foreseeable actions would be that the abundance and distribution of wildlife habitat would likely have a slight decrease at the cumulative effects boundary scale."</p> <p>Comment: Using beneficial treatments from other projects to off-set Corral Flats project's detrimental effects without clear disclosure is not good analysis or practice.</p> <p>Recommendation: Add information to the analysis so the public can understand the tradeoffs involved and the logic.</p>
26	<p>Summary</p> <p>USFS: "Due to the lack of adverse alteration to habitat, the limited adverse impact to habitat suitability, the low likelihood of direct injury to individuals or suites of wildlife species, and the lack of significant change in the overall use of the area by wildlife, there are no anticipated significant effects to the wildlife resource from implementation of the Corral Flat Endurance Trails project.</p> <p>Comment: This conclusion is not supported by the facts presented and requires the assumption that the permitted discretionary use as an equestrian trail for the past 25 years had no impact on wildlife use of the area. The Core Habitat analysis indicates loss of use with Preferred Alternative.</p>
45	<p>Consistency with Relevant Laws, Regulations, and Policy</p>

	Comment: Pres executive Order 13443. It should be added to the document and Text describing how the Implementation of the Preferred Alternative complies with the order. not listed and probably ignored.
50	Agencies Consulted Comment: ODFW is not listed as an agency consulted. They are however lumped in as member of the Ochoco Trails Collaborative. Recommend ODFW is specifically coordinated with and collaborated with, and their comments and recommendations be included in the EA document.
59	Resource Protective Measures USFS: Minimize disturbance for construction and maintenance ONLY. As described, 1) Elk calving area in season - .25 mi, 15 May – 30 Jun 2) Elk Rutting wallows in Season - .25 mi, 1 Sep – 15 Oct 3) Winter range – 1 Dec – 1 May Comment: Limitation to trail disturbance is not correct. LRMP 4-246 places no such limitation on trail disturbance. It would apply to all trail disturbance during described dates. Recommend: correct in the EA document.
61	Appendix B- Individual Species Analysis RE Table 1. Management Indicator Species as identified by the Ochoco National Forest Land Resource Management Plan for consideration of project-level effects and analysis. Rocky Mountain Elk and mule deer (See Table 1) Comment: A very shallow analysis. Both elk and deer are MIS and require an in-depth analysis. There is no distance band analysis for trail disturbance effect upon elk or deer. Analysis of elk impacts does not acknowledge PNW Starkey research indicating equestrian disturbance of elk is only slightly less disturbing and displacing than disturbance by an OHV or motor vehicles. An HEI analysis for elk was not performed nor was an alternative analysis performed. Connectivity impacts were addressed by Core Habitat Analysis, but not addressed in this section of the EA. Mule deer need to be fully analyzed too. Recommendation: Perform and include in the EA document a thorough analysis of Project impacts on deer and elk beginning with the existing condition.
66	Appendix C - Wildlife Core Habitat Analysis USFS - In a landscape context, a good way to visualize travel route impacts is through the concept of distance banding. This analysis has been included as it represents the most current and accurate way to quantify effects from habitat fragmentation on wildlife in general. Comment: No citation to support use of band analysis technique in core habitat analysis or the support of the selected band widths used for distance band analysis. Recommendation: Add citations
67	Appendix C - Wildlife Core Habitat Analysis

	<p>Table C-1: Comment: 1) Existing condition is different from the Proposed Action in some quantifiable but undisclosed respect as the reported results show Recommendation: Define the differences between the existing trail and the proposed trail systems which contribute to the results of the analysis. 2) Alt 2 Proposed action will reduce Core Habitat by 21%! (not by 10% as stated earlier in the EA) and most of the reduction occurred in patches > 100 ac. reducing the avg patch size from 157 ac to 85 ac. Recommendation: Correct the number cited.</p>
67, 68	<p>Appendix C - Wildlife Core Habitat Analysis Figure C-1. Core habitat available under the existing condition within the Corral Flat project area. Figure C-2. Core habitat available under the proposed action alternative in the Corral Flat project. Comment: The figures are difficult to place on the landscape scale. Recommend: Placing these two depictions to scale on maps.</p>
68	<p>Appendix C - Wildlife Core Habitat Analysis Proposed Action USFS - The proposed action has an adverse impact on existing core habitat within the project area in comparison to the existing condition as the total amount of core habitat and average core patch size available post implementation would be lower than that found in the existing condition. Comment: Why then is Alt 2 Preferred over the existing condition?</p>
69	<p>Appendix C - Wildlife Core Habitat Analysis Cumulative Effects USFS: Proposed actions from other projects within the cumulative effects boundary were considered in conjunction with the proposed action from the Corral Flat Trails project. There are no reasonably foreseeable actions within the spatial or temporal bounds that would alter the motorized road system or non-motorized trail systems therefore there are no anticipated cumulative effects from this project to core habitat. Comment: The inevitable conclusion.</p>

70	<p>Appendix D—Forest Plan Consistency for the Wildlife Resource Table D-1. Corral Flat project consistency with standards and guidelines associated with the applicable Forest Management Areas from the Ochoco National Forest Land and Resource Management Plan. Forest-wide MIS Comment: The Forest-wide MIS Project Consistency statement is not accurate for Deer and Elk both of which are designated MIS in the Ochoco NF LRMP. Consider the Project planning area is a contiguous 61 square miles of Deer and Elk summer range. (ODFW) Elk and deer require access to high quality and quantity of summer nutrition to put the females in a body condition to conceive, carry fetus to term, deliver a large healthy calf/fawn and to nurture it successfully. (Cook et al) An elk habitat utilization analysis (a distance band analysis for disturbance effects) was not performed for the No Action or the Preferred alternatives. Recommendation: Include in the EA document a comprehensive analysis project impacts upon both elk and deer.</p>
70	<p>Appendix D—Forest Plan Consistency for the Wildlife Resource Table D-1. FOREST-WIDE Rocky Mountain Elk and Mule Deer Standards and Guidelines Comment: Forest-wide standards and guidelines state for Big Game the HEI model should be used to determine if a proposed project will adversely or positively affect elk habitat effectiveness. (LRMP 2-245) The Draft EA indicates No HEI or comparable analysis was performed. Recommendation: Perform a comprehensive analysis for both nutrition and habitat utilization which includes a distance band analysis of disturbance effects.</p> <p>Project Consistency USFS:“Although elk and mule deer populations within the Ochoco Game Management Unit are below the state management objectives, a harvestable surplus remains across the Ochoco National Forest and exceed Forest Plan objectives. Projects occurring across the forest are managing towards HRV and thus reducing cover in habitat types where cover requirements may not be compatible with HRV. HEI values would not change with the Corral Flat Trails project and therefore would remain above Forest Plan goals and objectives”.</p> <p>Comment: The Project Consistency statement is incorrect because it does not address compliance with the prescribed standard and guideline which requires analysis of project impacts on wildlife in the specific project area. Conditions elsewhere in the Ochoco NF are not relevant to this standard and Guideline. Recommendation: Revise statement.</p>

70	<p>Appendix D—Forest Plan Consistency for the Wildlife Resource Table D-1.</p> <p>Forest-Wide Standards and Guidelines Protecting Calving/fawning areas and Elk Wallows</p> <p>Consistency Statement</p> <p>Comment: The statements for both the protection of calving/fawning areas and elk wallows are incorrect because they limit application to only trail construction and maintenance. The standards and guidelines in the ONF LRMP have no such limitation and thus would apply to all disturbance. (LRMP 4-246)</p> <p>Recommendation: Revise language to comply with LRMP language.</p>
73	<p>Appendix E – Cumulative Effects Spatial Bounding for the Wildlife Resource</p> <p>Figure E-1 displays the spatial bounding for cumulative effects for wildlife species analyzed in the Corral Flat Trails project. This boundary is made from buffering the proposed trail system by one mile to account for trail effects as well as other project effects immediately adjacent to the trail system.</p> <p>Comment: By inspection the figure shows the Project adversely impacts the entire planning area of 61 sq mi.</p>