

**November 6, 2024**

**Eric Watrud, Forest Supervisor**

**Umatilla National Forest**

72510 Coyote Road

Pendleton, OR 97801

**Shaun McKinney, Forest Supervisor**

**Wallowa-Whitman National Forest**

1550 Dewey Avenue, Suite A

Baker City, OR 97814

**Ann Niesen, Forest Supervisor**

**Malheur National Forest**

431 Patterson Bridge Road

John Day, OR 97854

**RE: Theodore Roosevelt Conservation Partnership Comments on the Blue Mountains Forest draft Preliminary Need to Change document**

Dear Mr. Watrud, Mr. McKinney, and Ms. Niesen,

On behalf of the Theodore Roosevelt Conservation Partnership (TRCP), I submit the following comments on the Blue Mountains Forest Plan Revision Draft, particularly as it relates to managing the vital landscapes that support hunting, fishing, wildlife conservation, and public access. TRCP's mission is to guarantee all Americans quality places to hunt and fish by safeguarding and improving the habitat that wildlife depends upon. We work with 63 organizational partners and 145,000 members nationwide, including more than 4500 in Oregon. We appreciate the Forest Service's mission to balance forest health, wildlife habitat conservation, and public use and we would like to offer the following recommendations as the Forest Service begins to develop the draft Environmental Impact Statement for the Blue Mountains National Forests.

**1. Balance roads, motorized use, and big game habitat needs**

The Wallowa-Whitman and Malheur are two of the only remaining forests in the nation without a travel management plan. A travel management plan should be developed, utilizing the best available science and considering the needs of wildlife habitat along with social values of user group communities, as soon as possible after these plan revisions are finalized to set a clear direction for motorized use of roads and trails. As hunters and anglers, our members understand the value of roads and trails that we rely on to access our favorite destinations to pursue game and fish. We also recognize that high-density roads and trails in the wrong habitat types can significantly impact fish and wildlife, especially with the

increasing use these forests have seen during the past 35 years since the 1990 forest plans were developed.

The Blue Mountains are home to one of the only Forest Service Research Stations specially focused on the science of deer and elk management and multiple use- the Starkey Research Station. The station has published several studies in the past 20 years about the impacts on deer and elk in relation to motorized and non-motorized access. This research highlights that big game avoid roads and need areas of security to remain on public lands. Researchers have helped shape commonsense solutions to manage motorized use and developed elk security standards that should be incorporated into this plan revision. Seasonal closures should also be carefully considered to ensure adequate elk security, particularly during elk hunting seasons and calving periods. Additionally, we encourage the use of physical barriers rather than merely signs to close roads, making closures more effective and improving enforcement.

## **2. Prioritize Big Game Migration and Connectivity**

In October 2024, the USDA issued a new Secretarial Memorandum that, among other things, directs the USFS to ensure they consider terrestrial wildlife habitat connectivity and corridors in relevant planning processes, programs, and assessments, as appropriate, including updated USFS land management plans. The TRCP was encouraged to see the final assessment include a section on big game and habitat connectivity and we encourage the USFS to ensure close coordination with the Oregon Department of Fish and Wildlife and other state/federal partners to utilize recent species' data and to support conservation of these important migratory and seasonal habitats for big game and other wildlife through specific forest plan components.

For example, solutions to the challenges facing migratory mule deer in this region could lie in the millions of data points that have been collected over the past decade by the Oregon Department of Fish and Wildlife. Preliminary analyses from more than 1,000 GPS-collared mule deer demonstrate the importance of the summer range that's provided by the Wallowa-Whitman, Umatilla, and Malheur national forests for big game herds. New migration corridors are also being discovered and researchers have observed some deer migrate as far as 60 miles from the Blue Mountains to the Malheur National Wildlife Refuge at the foot of Steens Mountain. Others move perhaps only a few miles. Because mule deer rarely alter their migration routes, the Forest Service should consider migration data in their planning processes. The information could be used to focus summer range restoration work to help wildlife build their fat reserves for winter survival and reproduction through thinning the canopy and restoring valuable shrubs on the forest floor. The location data from collaring mule deer and elk can also show land managers where deer and elk may get hung up on roads, highways, and fences, or where their historic paths intersect with potential development.

The 2012 National Forest Planning Rule allows the agency to look at the entire ecological and social sustainability of the forest. Instead of viewing forests as small pieces separate from one another, the rule encourages planners to look at how management of the forest can contribute to broader landscapes, including the role that a forest plays in providing important seasonal habitats and migration

corridors for big game. The Oregon Department of Fish and Wildlife has prioritized collecting GPS information to learn where mule deer migrate– and more recently where elk move and the data shows that the Blue Mountains provide essential summer range habitat for both mule deer and elk and that forests with open canopies and high forage productivity with shrub/grass component are key factors in body condition. The USFS should take a holistic approach that incorporates migration corridors and key summer range data into the analysis and management decisions into the final plan revision. The USFS should additionally incorporate input from local communities and tribes to support vibrant local economies along with robust wildlife populations.

### **3. Appropriately Manage Elk Habitat and Distribution**

One of the key issues in the Blue Mountains is the ongoing challenge of elk distribution, which has led to significant elk damage on private lands. TRCP supports habitat enhancements such as thinning, prescribed burns, and road density reduction in the revised Forest Plan to create favorable forage and enhance elk security. This approach aligns with research indicating that elk are more likely to remain on public lands when provided with quality forage and less disturbed habitats. We encourage the USFS to work within USDA and other federal and state agencies to utilize programs and partners such as the Shared Stewardship Agreements, Good Neighbor Authority, Joint Chiefs Projects and the Natural Resource Conservation Service's Regional Conservation Partnership Program to conduct habitat restoration projects across both private and public lands to enhance elk distribution and use on public lands to minimize conflict and damage on private lands.

### **4. Appropriately Manage Mule Deer Habitat**

Mule deer populations have faced challenges due to many factors and are currently 50% below management objective overall in the wildlife management units within the Blue Mountains. Habitat loss, wildfire, predation, invasive species, drought, and many other factors are contributing to the decline. We support habitat enhancement projects on both summer and winter ranges for mule deer, especially shrub-steppe habitats critical to their survival in winter and key summer range areas that need to be thinned to enhance their productivity while does are nursing fawns. Fire should be carefully managed in these areas, with the goal of protecting fire-intolerant shrubs such as bitterbrush. Additionally, we recommend that the USFS consider specific forest plan components necessary to reduce habitat fragmentation and include mule deer as a species of conservation concern given their decades long population decline, changes to forest management since the 1990 plans were developed, and increasing impacts to habitat from fire, drought, invasive weeds and more.

### **5. Promote Active Forest Management That Benefits Wildlife**

TRCP supports active management within the dry forests of the Blue Mountains to open the forest canopy and support recruitment of the high-quality browse needed by mule deer in the summer months to make it through winter. Many of these thinning projects could further benefit mule deer and other wildlife habitats by incorporating prescribed burns or shrub seeding/planning after completion of the timber harvest. The TRCP is supportive of the creation of gaps to enhance big game forage and provide

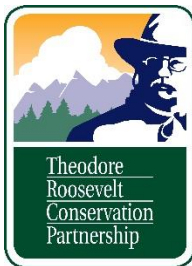
areas of security. We believe increasing the pace and scale of these types of forest projects across the Blue Mountains, when they have a direct benefit for wildlife, would also help alleviate some of the challenges currently ongoing related to elk distribution and the increasing amount of time that elk are spending on private land.

#### **6. Support Collaboration with Partners and Local Communities**

TRCP values partnerships with other stakeholders, including ODFW, local tribes, private landowners, and the many local communities that rely on the Blue Mountains. We encourage the Forest Service to continue collaborating with these groups to achieve comprehensive and effective management strategies, especially in areas where wildlife populations cross between public and private lands.

Thank you for your consideration of these comments. We appreciate the opportunity to contribute to this important planning process and look forward to working with the Forest Service to ensure that the Blue Mountains continue to provide quality habitat for wildlife and outstanding hunting opportunities for future generations.

Sincerely,



***Michael O'Casey***

Deputy Director, Forest  
Policy and Pacific  
Northwest Programs

Phone (541)-668-2316

70633 Holmes Road

Sisters, OR 97759

**Theodore Roosevelt  
Conservation Partnership**

[www.trcp.org](http://www.trcp.org)