



**ROCKY MOUNTAIN
ELK FOUNDATION**

December 23, 2024

Stone Creek Vegetation Management Project
c/o Caila Campbell
Clackamas Ranger District
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<https://www.fs.usda.gov/project/mthood/?project=65780>

Scoping Comments: Stone Creek Vegetation Management Project

The Rocky Mountain Elk Foundation strongly supports this project designed to improve forest health, reduce stand density, promote species diversity, and reduce the risk of spreading insect and disease problems across the Forest.

A high density of trees can have a negative effect on local populations of deer, elk, and other wildlife that are dependent on early seral habitat.

We support the proposed action to reduce the stand density on 930 acres using non-commercial treatments and 850 acres using commercial thinning.

Elk and Deer are Management Indicator species on the Mt Hood National Forest. Their habitat should be managed to show a high level of concern for all species, both plants and animals, that are reliant on early seral habitat for their survival.

There are several Standards and Guidelines found in the Mt Hood National Forest Land and Resource Management Plan (LRMP) that are relevant to this project. "An effort to maintain stable deer and elk populations, a consistent quantity of foraging areas should be produced through timber harvest" FW-194. "A consistent acreage quantity of early successional plant communities created by timber harvest activities should be encouraged in all decades" FW-195.

Please consider the following comments when developing your preferred alternative for this project:

1. We recommend reducing the canopy cover of areas being thinned to 35% or less. It would be best to reduce the canopy cover down to 25-30%.
2. Small gaps that are 30 feet in diameter provide very little diversity beyond what would be achieved with normal thinning. We recommend creating gaps in some

of the areas being proposed for harvest that are from 1 to 5 acres in size. These gaps should be placed in areas away from open system roads whenever possible.


3. This portion of the Forest has a generally flat terrain and if roads are closed it is fairly easy to drive around the barriers with a four-wheel drive vehicle. Because of this, any roads that are being considered for closing after the project is completed should have large boulders placed on both sides of the gate to prevent vehicles from driving around them. These roads should be planted with a forage mix of native grasses and forbs, and shrubs such as blue elderberry, willows, red osier dogwood, or other brush species that are used as forage by elk or deer.

We recommend that the Clackamas River Ranger District collaborate with the Clackamas District Wildlife Biologist, Oregon Department of Fish and Wildlife (ODFW), 17330 SE Evelyn Street, Clackamas, OR 97015, regarding big game habitat enhancements and open road density for the Stone Creek Vegetation Management Project

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