



**ROCKY MOUNTAIN  
ELK FOUNDATION**

January 8, 2025

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Sweet Home Ranger District  
Willamette National Forest  
4431 Highway 20  
Sweet Home, OR 97386

E-mail: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64261>

Subject: Comments – Upper Canyon Draft Environmental Assessment

The purpose of this letter is to state the Rocky Mountain Elk Foundation (RMEF) strongly supports the Upper Canyon Project for the active forest management it proposes to implement within the project area. RMEF concurs with the stated purpose and needs for the project and the proposed silvicultural treatments and other proposed activities.

RMEF suggests the public's forest resources within the project area would be better served by increasing the size of the treated area well beyond the proposed 822 acres of actual thinning (the 247 acres of Skips are untreated). Further, RMEF suggests the proposed thinning objective for canopy cover be 35 to 50 percent rather than the proposed 40 to 60 percent, and the upper limit for gap creation be increased to 5 acres from the proposed 3 acres.

The Draft EA proposes to implement the silviculture treatments in the 4150 acres of stem exclusion 31-80 age class for good reasons. The draft goes on to explain the 0-30 year-old stand initiation/early seral class at 3% of the area is well below HRV and even with the proposed gap creation and thinning will not come close to achieving HRV. Using the Westside Elk Nutrition Model to analyze the impact of the proposed treatments, the Draft EA reports that the quality and quantity of elk forage anticipated to be produced was a small improvement in both quantity and quality over the existing condition. The Draft EA acknowledges the majority of the early seral in the project area lies on the adjacent private industrial forest land but is of poor quality because of industrial forest practices. The Draft EA states that after this project there are no forest management projects proposed in the foreseeable future.

Based upon the comments in the two foregoing paragraphs, RMEF suggests an additional action alternative be developed and analyzed in the final EA. If the small acreage of proposed treatment meets the purpose and need for the project, then a somewhat larger project will certainly do an even better job. And by increasing the early

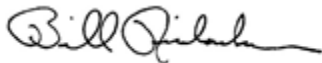
seral forage base through an increased acreage of thinning and gap creation and opening the forest canopy in order that increase solar radiation reaches the forest floor, both forest and the wildlife are winners for a longer period than would be the case if the proposed action were implemented. The Early Seral class (Stand Initiation) of vegetation is the most wildlife species-diverse of all the vegetation class, more species are obligated to it than to any other vegetation class.

The Rocky Mountain Elk Foundation advocates for and supports active forest management because it leads to habitat improvement 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 submit comments on Draft EA for the Upper Canyon project.

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