



**ROCKY MOUNTAIN
ELK FOUNDATION**

April 21, 2025

Darren Cross, District Ranger
McKenize River Ranger District
Willamette National Forest
57600 McKenzie Highway
Mckenzie Bridge, OR 97413

Re: Draft Environmental Assessment Calloway Project:
<https://cara.fs2c.usda.gov/Public//CommentInput?Project=63148>

District Ranger Cross,

The purpose of this letter is to state that the Rocky Mountain Elk Foundation (RMEF) supports active forest management, which the Calloway Project proposes to implement within a 45,000-acre project area. The proposed thinning and meadow rehabilitation are, respectively, 5886 acres and 599 acres. Road decommissioning and storage are also proposed. RMEF concurs with the document's stated purposes and needs for this project.

While RMEF supports this project, the Draft Environmental Assessment (EA) seems too brief, shallow and lacks analytical rigor. A strong analysis of impacts for all the traditional resources is needed in the Final EA. It is also unusual to see only one action alternative. Alternatives provides the assessment with more rigor as multiple options are considered.

Of particular concern to RMEF is that the Draft does not analyze potential impacts to the wildlife resources present in the project area. The Draft EA only addresses the Northern Spotted Owl. RMEF recommends following the lead of the 1990 Willamette National Forest's Land and Resource Management Plan (LRMP) and analyze the Forest's management indicator species (MIS) for forest habitat.

Elk are Identified as an MIS by the Willamette's LRMP which also designated Big Game Emphasis Areas (BGE) and provides several Standards and Guidelines for elk habitat management including the requirement that forest actions within in these mapped areas be analyzed (LRMP, p IV 67-70). RMEF recommends that the analysis be included in the final EA using the Westside Elk Nutrition and Habitat Utilization Models as prescribed by the Regional Forester, Region 6 back in 2013 (See attached letter).

Additional comments:

The Draft EA (p, 10) did not indicate coordination or collaboration with the Oregon Department of Fish and Wildlife (ODFW). RMEF highly recommends coordination ODFW's District Wildlife Biologist in Springfield, Oregon.

The Draft EA (p,138) should have addressed Presidential Executive Order 13443 - Facilitation of Hunting Heritage and Wildlife Conservation, August 16, 2007.

RMEF is supportive of the reduced wildlife disturbance that will result from the decommissioning and storage of roads. This noise reduction should help encourage elk to utilize the improved forage, resulting from the project. RMEF suggests that a wildlife forage seed mix be used on all the decommissioned roads, skid trails and landings.

RMEF is also supportive of the 599 acres of meadow rehabilitation proposed by the Calloway Project.

Thank you for the opportunity to submit comments on the Draft EA for the Calloway Project

Sincerely,



Karie Decker
Director of Wildlife and Habitat

Attachment:

Forest Service Memorandum; Region 6; Subject: Westside Elk Model; Signed K.P. Connaughton, Regional Forester; Dated February 21, 2013.