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WDFW supports the main objective of this proposal of restoring the historic range of variation in the Lick Creek and North Fork of Asotin Creek watersheds. The proposed outcome should increase the desired habitat for many of our Species of Greatest Conservation Need (https://wdfw.wa.gov/conservation/cwcs/) and protection for our Priority Habitat and Species.

General Comments

[middot] WDFW is concerned about the possible negative effects this project may have on elk distribution and habitat availability due to decreased cover on a landscape with higher road densities. In addition to cover impacts, removal of vegetation, particularly at higher elevations, will negatively affect an important late- summer nutrition source. The EIS analysis indicates that Alternative B would have greater negative effects on the elk using the project area when compared to Alternative C.

[middot] WDFW has concerns regarding road management in the project area. The opening of closed roads and establishment of temporary roads could increase mortality from hunting and affect condition of elk due to increase of disturbance during key times of the year. WDFW requests that temporary roads and currently closed roads remain closed to the public throughout the length of the project. WDFW requests consideration of additional targeted seasonal closures; August through December. WDFW supports the closure of haul roads located in winter range during the months of December through March.

[middot] This EIS only analyzes the effects of the proposed project. This fails to capture the potential cumulative effects of other recent projects that are adjacent to this project. The impacts to elk within the Asotin Watershed may be much greater when cumulative effects are considered from activities in Charley Creek and George Creek. WDFW requests that cumulative effects within the Asotin watershed be considered when analyzing and identifying a preferred alternative.

Specific Comments to the EIS Elk
1. 2-31- Within units designated for intermediate cutting, those identified as [ldquo]high-retention[rdquo] areas will be treated to maintain marginal or satisfactory wildlife cover and/or satisfactory cover for wildlife connectivity corridors

WDFW would like clarification for the definition of [ldquo]marginal[rdquo] wildlife cover. This does not specify [ldquo]elk cover[rdquo], which is defined within the document.

2. 2-33 Riggs et al. 2000 is referenced to state that intense ungulate herbivory has potentially caused the loss of shrubs. This reference is not in the Literature Cited section and may not be a relevant reference for the loss of shrubs. Particularly with the very low density of deer using National Forest lands, the primary browser of shrubs. It may be inappropriate to indicate wild ungulates as a problem here without information that shows the decline is specifically attributable to wild ungulate browsing. A number of other causes are likely to be important here.

The Lick Creek subherd has declined from an estimated 990 elk in 2014 to 652 by the end of the 2016/2017 winter. This decline has occurred with calf ratios declining from 30:100 cows in 2014 to 22:100 cows in 2017, along with bull ratios declining from 16 bulls:100 cows to 10 bulls:100 cows during the same time period. This elk subherd is very important for recreational hunting and subsistence hunting. Due to the sharp decline in this herd, along with large numbers of wintering elk leaving the public lands (WDFW and USFS) during the past 3 winters, WDFW has had to reduce public hunting opportunity significantly. It is WDFW[rsquo]s goal to recover this elk subherd, allowing the population to return to levels that can sustain additional recreational opportunity while providing for subsistence hunting. The loss of available summer habitat and the increased vulnerability elk will have to recreational harvest, poaching, and subsistence harvest in the proposed project area will limit our ability to reach that goal.

The EIS uses the amount of habitat as the major indicator on determining effects. This is not appropriate when dealing with ungulate species that are sensitive to a number of factors that influence the [ldquo]usability or availability[rdquo] of that habitat. For example, elk habitat availability is directly correlated with the proximity to open roads and security cover. Habitat is not used at the rate it is available when disturbance is close. The majority of the proposed vegetation management portion of this project (non-prescribed fire activities) are located in close proximity to headwater streams and high elevation meadows, which are a primary source of nutrition during the later summer months. These critical habitats will be heavily impacted by the proposed activities and the effects will last for many years (reduced security cover, open roads adjacent to primary food sources). Alternative C would reduce the impact to this elk subherd by limiting vegetation removal (in comparison to Alt B). Additionally, targeted seasonal road closures (Aug 1 [ndash] Dec 1) would also be beneficial in the areas of remaining elk security cover as mapped in Alternative C. WDFW requests an opportunity to discuss additional seasonal closures with USFS staff.

3. 3-107

Elk cover in the headwaters of Asotin Creek would be extremely limited by selecting Alternative B. This herd is already declining for a number of reasons. The high road density outside of the inventoried roadless areas will limit the availability of necessary habitat and hinder the recovery of this elk population. Additional road closures for all motorized vehicles could mitigate some of the reduction in elk habitat, particularly in areas within close proximity to [ldquo]Satisfactory

Cover[rdquo] (page 3-108, Figure 3-7).

4. 3-109

WDFW supports the restriction of any activities on elk winter range from Dec 1-March 30 and the calving closure until June 30.

WDFW requests the closure of Devils Tailbone Road (4000-360) whether Alternative B or C is selected.

The last paragraph of 3-109 discusses elk putting on weight to last through the winter, this is also critical for female elk to increase body fat to be physically capable of going into estrous and becoming pregnant.

5. 3-110 (last paragraph)

The Blue Mountains Elk Initiative (BMEI), of which both WDFW and the USFS are partners, has identified improving elk habitat on National Forest Lands as one of its highest priorities. It is particularly important for the Department to improve forage on public lands to reduce migration onto private lands..

Roads 6. 2-36

The EIS states that closed roads will remain closed to the public during operations. Historically, public access has increased dramatically if gates were not in place or were left open during and after operations (recent activities on the 42 road for example). Enforcing this statement is very important for wildlife management.

There are numerous statements about no impact to the elk population. This may not be true with reduced security cover in an area with high road densities. Direct mortality of elk through harvest would have a negative impact to this population, which is currently struggling with poor recruitment. Any increase in mortality would be a direct impact to this population.

7. 3-83

This section should include a reference to the elk research conducted by WDFW within the project area (McCorquodale et al. 2010). This research project evaluated the impacts roads have on elk survival, finding that hunters harvested marked elk closer to roads than unharvested marked elk were found during the hunting season. The higher the road density, the harder it is for elk to get away from hunters, resulting in higher mortality of elk.

8. 3-84

It is stated that the road density in MA-C4 is low (1.2 per mi2). This may be misleading due to the roadless area included in this analysis. If the roadless area was not included, the MA-C4 area would have much higher road density, highlighting the lower value this habitat, within the working project area, has for elk. By including the roadless area, the numbers are diluted in the area being logged. This is dilution is referred to on the same page: [ldquo]MA-C4 HEI value is 70, which is above the minimum forest plan standard of 60. Although this value is high, it does not reflect the poor distribution of cover in much of the C4 analysis area. The roadless area has good cover and no open roads, which brings up the overall HEI value[rdquo]. The more valuable summer/fall habitat for elk is the area being focused on for vegetation manipulation (headwaters, meadows, higher elevations). This is the area being impacted the most with the proposed project, but the effects of roads is being diluted by including adjacent habitat that is of lower nutritional value during key summer months. WDFW requests that the road density be analyzed with the Inventoried Roadless Area removed.

Bighorn Sheep 9. 3-117

The EIS states that there will be no effect from these activities on bighorn sheep. However this does not consider that habitat currently not used by bighorn sheep, because of high canopy cover, will now be opened up. This could lead to increased use of higher elevation habitat.

Effects will likely be increased herd home range size, increased probability of interherd movement between the Asotin herd and the Tucannon, Wenaha, and Mountain View herds. This increased movement between herds will improve genetic flow, but also increase the probability of disease transmission between these herds. Disease transmission is the limiting factor of bighorn recovery in Hells Canyon. Research projects have modelled interherd movements of M. ovi. positive bighorn sheep, finding that disease transmission between herds can theoretically threaten the viability of a bighorn sheep herd.

Wildlife Report

10. Page 8 - MA-C4, Wildlife Habitat: designated in the Forest Plan to [lsquo]provide high levels of potential habitat effectiveness for big game and other wildlife species[rsquo] (FP 4-158). A mosaic of even-aged and uneven-aged stands dispersed in a manner is desired to create a pattern of forage and cover. Managing roads is emphasized to provide big game security

With only a single seasonal closure (associated Alternative C); road management to provide big game security may have limited effectiveness.

11. Page 9- MA-C4 is 53 percent cover, well above the forest plan minimum of 30%; however, the roadless area is providing much of the cover while the managed areas are lacking. Alternative C addresses this issue.

The use of Inventoried Roadless Area is diluting the effects to the proposed project area. The most desirable elk habitat is located within the primary area proposed for forestry activities.

12. Page 9- MA-C4 open road density is 1.2 miles per square mile. Parts of this MA-C4 are within the Asotin Creek Roadless Area.

WDFW requests clarification of this analysis by stating what percentage is located in the roadless area and what road densities would be without its inclusion. This information will allow for more accurate analysis of the potential impacts to elk.

13. Table 3 (Page 9)

This table describes existing conditions and Forest Plan measures for elk habitat. However, the table does not provide post activity estimates for conditions. WDFW requests that post activity estimates of HEI are provided to increase the value of this table for analysis of the project.

14. Page 10- MA-C4 HEI value is 70, which is above the minimum forest plan standard of 60. Although this value is high, it does not reflect the poor distribution of cover in much of the C4 analysis area. The roadless area has good cover and no open roads, which brings up the overall HEI value.

Documents associated with the analysis of this project recognize the potential of skewing the data by including roadless areas in calculating HEI. We believe that there is value to including both HEI values with roadless areas and without roadless areas. We request that this information be provided in the EIS.

15. Page 10

This page discusses Elk Forage and the potential effects of livestock grazing. This portion of the document references the Project Range Report. This report does not appear to be available on

the website, WDFW requests that this information be included with the other supporting documents.

1. Table 7 (Page 14)

MA-C4 HEI for Alternative C does not show post treatment change and Alternative B only decreases by 2 percent. This seems to be counter intuitive. WDFW requests clarification regarding the methods used to arrive at these estimates.

1. Page 14 -Some closed roads would be opened temporarily for harvest and fuels activities; however they would remain closed to the public. Temporary roads would be established, but decommissioned once the project is completed.

WDFW requests clarification regarding the statement above. While it is clear that previously closed roads remain closed to the public; there is no statement refgarding public access to temporary roads. Historically, this has been an issue with USFS Vegetation Management projects. The public quickly starts using these roads and have significant impacts to elk distribution. The project conducted in Upper Charley Creek 5-10 years ago resulted in numerous illegal motorized trails accessing these designated closed roads, resulting in a dramatic decrease of elk use in certain areas. WDFW requests that all temporary roads be closed to the public at all times, and that closure of the roads is a high priority upon completion of the harvesting activities (gates at a minimum).
Fire

1. WDFW supports the use of prescribed fire on the landscape to improve wildlife habitat. A majority of wildlife species benefit from this form of successional disturbance.
Riparian

1. The opening of large areas of forest may affect ungulate and bovine distribution during the summer months, potentially concentrating use into the remaining high crown cover areas, i.e. riparian. Elk may move into these areas to avoid road use and find more nutritious vegetation during the drier months, while cattle may use these areas for thermal relief. Additional monitoring may be appropriate to detect negative vegetation effects for the first 10-15 years post-harvest.