Data Submitted (UTC 11): 2/11/2020 5:21:17 PM First name: Larry Last name: Irwin Organization:

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Comments: Recent research suggests that elk habitat objectives should include an understanding of the importance of seasonal nutritional values of forage, particularly on summer-fall range (not simply forage/cover ratio as in the past). A former belief held that since the world is green in summer and winter range sets the template for population size (along with hunting and predation), increasing summer-fall forage would have no effect on populations because the additional forage would be superfluous. The attached document explains how those beliefs were quite incorrect. In fact, summer-fall nutrition exerts strong effects of most of the important biological functions in elk, from age at first breeding, timing of breeding, over-winter survival, growth of calves, etc. In addition, new information demonstrates that forest productivity is crucial to elk population response to forest management--a clear-cut or thinning in subalpine fir will have a limited effect compared to management within Douglas-fir, for example. Dr. Mike Wisdom at the PNW Lab in LaGrande, OR can provide recent research on that topic.