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Title: Sr. Lands Program Manager
Comments: April 15, 2020

Lyn Medley, District Planner Willamette National Forest Detroit Ranger District

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E-mail: <https://cara.ecosystem-management.org/Public/CommentInput?Project=56803> and

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Subject: Scoping Comments - Divide Project

The purpose of this letter is to state the Rocky Mountain Elk Foundation (RMEF) strongly supports the active forest management activities proposed in the Divide Project scoping letter. RMEF recommends adding an additional purpose to those proposed in the scoping letter - development of early seral vegetation in an amount sufficient to equal historical range of variability (HRV) for the project area.

RMEF proposes development of early seral be a purpose of the Divide Project for the following reasons:

1. Available overhead imagery of the project area shows the early seral vegetation type to be a rare commodity, and likely well below HRV.
2. The Forest Plan designates elk and deer as management indicator species of habitat quality.
3. Deer and Elk are obligated to the early seral vegetation type because that is where they find most of their forage.
4. Deer and elk are two of more than 100 other species that are also obligated to the type (O'Neil et al, 2001). Several of the early seral obligated species are on the Regional Forester's Sensitive Species List.
5. The Divide Project area is within the Oregon Department of Fish and Wildlife's (ODFW) Santiam Wildlife Management Unit (WMU). Published ODFW records indicate deer and elk populations are in decline in the

Santiam WMU with populations well below ODFW management objective, and hunter success is very poor.

1. ODFW has published management plans for both elk and black-tail deer that indicate lack of quality and quantity of forage is a principal contributing factor to declining game populations.

Additionally, RMEF provides the following comments regarding the proposed Divide Project:

1. We are pleased to note the meadow enhancement and noxious weed abatement aspects of the project.
2. Recommend thinning to 35% canopy cover to allow maximum sunlight to reach the forest floor to stimulate understory vegetation, big game forage and browse.
3. Increase the acreage of regeneration harvest and gap creation to increase amount early seral vegetation type to approach HRV.
4. Seed all disturbed soil with native grass and forbs of high forage value to big game, i.e. landings, skid trails, decommissioned roads, etc.
5. Use the Western Oregon and Washington Elk Nutrition and Habitat Utilization Model (Rowland et al, 2013) to analyze the impacts on elk from the various action alternatives that will be developed as project planning proceeds.
6. Establish and maintain collaboration and the ODFW District Wildlife Biologist at Corvallis (Adair).

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 this project. Sincerely,

Bill Richardson

Oregon & Washington Sr. Lands Program Manager Rocky Mountain Elk Foundation

References:

O'Neil, Thomas A., et al, Matrix for Wildlife-Habitat Relationships in Oregon and Washington. Northwest Habitat Institute. 2001.

Rowland, M., et. al. 2013. User guidelines for application, summary, and interpretation of westside elk nutrition

and habitat use models. Draft Version 2.0. U. S. Forest Service Pacific Northwest Research Station, La Grande, Oregon. N. p.

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