



Oregon

Kate Brown, Governor

Department of Fish and Wildlife

Deschutes Watershed District

East Region

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November 19, 2019

Jacob Young, Range Conservationist
Ochoco National Forest
3160 NE Third Street
Prineville, Oregon 97754

RE: Sunflower Project Scoping Comments

Dear Mr. Young,

As the agency mandated with management of Oregon's fish and wildlife (ORS 496.012), the Oregon Department of Fish and Wildlife (Department) is responding to your request for comments on the Sunflower Project Scoping Notice (Project). The Project proposes to reauthorize livestock grazing on the Dry Corner, Sunflower, and Wind Creek grazing allotments (Sunflower Cluster) as well as close and decommission roads and improve stream functioning.

The Department has the following comments/recommendations:

Fisheries

The Department is concerned about the degraded riparian conditions that may result from grazing within the Wind Creek, South Fork Black Canyon, Wildcat, and Frazier Creek drainages. These systems are essential salmonid habitat for ESA listed Mid-Columbia steelhead, as well as sensitive redband and Chinook salmon species. Additionally, water quality issues may arise from grazing tributaries that feed the South Fork John Day River system. Water quality in this basin is 303(d) impaired by the Oregon Department of Environmental Quality due to high sediment inputs and stream temperatures. Therefore, we suggest the following:

- Construct the proposed fence on Wildcat Creek along the west side and defer grazing along the east side until riparian conditions improve. As proposed, the new fence along Wildcat Creek crosses the riparian several times, increasing the amount of grazing within sensitive riparian habitat.
- The new holding pasture around Cougar Creek will concentrate cattle and cause negative riparian impacts. We propose a fence to exclude cattle from Cougar Creek, preferably with the addition of spring developments or water gaps.
- A new holding pasture encompasses a portion of Wind Creek, vastly concentrating cattle along the riparian area. We propose to exclude Wind Creek in its entirety and construct a new spring development or water gap if springs are not available.

In addition to the above comments, the Department appreciates future coordination with the John Day Fish District to identify and prioritize actions that would directly benefit Chinook, steelhead, and redband

trout habitats. Restoration actions and excluding cattle from riparian areas within the Project area will provide a benefit to listed and sensitive fish species, as well as improve stream temperatures to the South fork John Day River, a vital watershed for the recovery of critical fish species.

Wildlife

- The Department applauds the Ochoco National Forest (ONF) in proposing a project that will seek to permanently and effectively close roads in important elk and mule deer summer and winter range. This type of project will increase elk security on the National Forest, encourage elk to spend more time on public land as opposed to neighboring private lands therefore reducing damage complaints and conflict. It will also greatly reduce harassment of big game during the winter and spring season.
- The Project area overlaps the eastern side of the existing seasonal Rager Travel Management Area (TMA) and the corresponding Project road closures encompass most of the roads closed in the TMA. The Department would like to propose an addition of a small number road closures to the Project would that would bring it into alignment with the current Rager TMA. This would make signage and posting of the open road network more effective and consistent. Cooperative enforcement and compliance would increase with a simplified closure system. The Department is willing to sit down with the Forest to identify which roads should be added and how to modify the existing Rager TMA map to display both the seasonally closed roads and the roads closed permanently.
- The Department supports efforts by the ONF to trap and remove wild horses that have moved into this project area from other wild horse herd management areas. The Department supports continuing this management activity to reduce the likelihood that a population of wild horses become resident to this area.
- Please provide a concise description and timeline for implementation of road closures and decommissioning.

Thank you for the opportunity to comment. If you have questions or want information that the Department can provide, please contact me.

Sincerely,



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CC: Bruce Eddy – ODFW East Region Manager
Mike Harrington – ODFW Deschutes Watershed District Manager
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