



Juniper Group Sierra Club
c/o Environmental Center
16 NW Kansas Avenue
Bend, OR 97703

20 December 2020

To:

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

Regarding: USDA FS Sunflower Project, <https://www.fs.usda.gov/project/?project=56602>

The Juniper Group Sierra Club, representing over 2000 members in Eastern Oregon counties, is responding to your request for comments on the Sunflower Cluster Project Scoping Notice (Project).

We strongly support road closures and other efforts that are broadly characterized in the scoping letter as improving elk and deer habitat, as well as improving critical steelhead habitat. Road closures are important to reduce wildlife disturbance throughout the year, but especially during calving season. Roads also degrade riparian areas and stream habitat by increasing sedimentation and increasing overuse and abuse by recreationists. We therefore recommend that the FS consider even more closures, and always use gates, berms, and other physical measures to discourage illegal use of closed roads.

While grazing requires fencing for proper management as well as protection of riparian areas from destruction by cattle, fencing is not good for wildlife. Fencing restricts necessary movement for feeding and finding shelter and water. Fencing can itself injure and kill wildlife. This Project includes several miles of new fencing as well as reconstruction of many more miles. We support any fence removal, and only where necessary the construction of wildlife friendly fencing, such as described on this page of Think Wild: <https://www.thinkwildco.org/wildlife-friendly-fencing/> and in this USDA document https://efotg.sc.egov.usda.gov/references/Public/OR/382AAjs_OR_WildlifeFriendlyFence_4-15-10.pdf At a minimum, all fencing must have a smooth top wire to reduce injury to wildlife attempting to jump it.

We have reviewed the comment filed on this Project by the OR Department of Fish and Wildlife and agree with those comments and recommendations. We have also reviewed the comments filed on this Project by Oregon Wild and agree with those concerns.

While we would like to see reduced grazing on this land, we understand the economic needs of the ranchers in the area. We cannot offer our unconditional support for this project, but offer our concerns and along with OR DFW and OW want to improve the implementation with these suggestions.

Juniper Group Sierra Club
Bend, OR