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First name: Karie

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Organization: Rocky Mountain Elk Foundation (RMEF)

Title: Director of Wildlife and Habitat

Comments: July 14, 2025

Forest Supervisor Eric Watrud

Attn: Ellis Integrated Vegetation Project

Umatilla National Forest

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Pendleton, Oregon 97801

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The Rocky Mountain Elk Foundation (RMEF) would like to submit the following objections for the draft Record of Decision (ROD) and Final Environmental Impact Statement (FEIS) for the Ellis Integrated Vegetation Project.

Name and address of Objector

Karie Decker

submitting on behalf of the objector, the Rocky Mountain Elk Foundation (as an entity)

(Signature for Karie Decker, representing the Rocky Mountain Elk Foundation)

RMEF objection standing per 36 CFR Part 218 Subpart A and B:

RMEF qualifies as an entity, as defined in § 218.2, who has submitted timely, specific written comments regarding a proposed project or activity that is subject to these regulations during any designated opportunity for public comment. Opportunity for public comment on an Environmental Impact Statement (EIS) includes during scoping or any other instance where the responsible official seeks written comments. RMEF submitted two separate comment letters during the periods when the responsible official was seeking written comments: January 2, 2019 (scoping) and April 14, 2022 (DEIS).

Name of Project: Ellis Integrated Vegetation Project

Responsible Official: Forest Supervisor Eric Watrud

Location: Umatilla National Forest

Statement that Demonstrates Connection between Prior Specific Written Comments on the Proposed Project and Content of the Objection

In RMEF comments to the DEIS, RMEF specifically addresses elk security, creation of improved forage quantity and quality in proximity of elk security habitat, and the requirements placed upon the USFS by Presidential Executive Order 13443.

Objection:

Provision of improved elk security throughout the project area is a stated Purpose and Need of the Ellis project from Scoping through FEIS documents. See Table 1, Purpose and Need, in each of the documents "Improve Wildlife Habitat" is a listed purpose. In each case elk security is a listed need. As it stands in the draft ROD, the Purpose and Need to provide for improved elk security is not being met.

Both the DEIS and the FEIS document the science connecting open road disturbance and displacement of elk, in highly sensitive areas, using research from the Pacific Northwest Starkey Forest and Range Experiment Station (Supporting document Integrated Vegetation and Road Management for Elk and other Wildlife).

The draft ROD asserts, on page 1, that "Road closures were removed from this decision because the science used to develop roads management for the action alternatives was misapplied to the Ellis project (Hillis et al 1991)." RMEF requests details on how the USFS misapplied the recommendations of Hillis et al., 1991, in previous project documents. Prior USFS analysis on the project has given careful consideration and analysis to elk security - both the DEIS and FEIS documents conclude that the public, elk and the adjacent private landowners would benefit from elk remaining on public land (as evidenced by the action alternatives developed by the USFS). However, the draft ROD does not follow the FEIS science-based recommended action.

RMEF also asks the USFS to consider requirements of Presidential Executive Order 13443, Facilitation of Hunting Heritage and Wildlife Conservation in the FEIS and draft ROD. Section 2 of the order is particularly relevant to this project.

RMEF suggestion

RMEF suggests that the USFS implement Alternative 2, but modified to provide road management recommendations found in the DEIS, Alternative 5. This would follow the science of Hillis et al. 1991 by providing a minimum of 30% elk security in highly sensitive areas.

RMEF appreciates the effort of the USFS to engage multiple stakeholders throughout this process and hopes for a new Proposed Action that will help maintain elk populations on public land while reducing conflict potential on adjoining private lands.

Sincerely,

Karie Decker

Director of Wildlife & Habitat