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Organization: Oregon Department of Fish and Wildlife

Title: East Region Manager

Comments: Eric Watrud, Forest Supervisor

Umatilla National Forest

72510 Coyote Road,

Pendleton OR 97801

Subject: Ellis Integrated Vegetation Project

July 14, 2025

Dear Mr. Watrud,

The purpose of this letter is to provide Oregon Department of Fish and Wildlife's (ODFW) objection to the draft Record of Decision for the Ellis Integrated Vegetation Project, which is located on the Heppner and North Fork John Day Ranger Districts, Umatilla National Forest. ODFW is concerned that the selection of Alternative 2, modified to include Alternative 1 (No Action) for road management actions, will not effectively improve or maintain elk habitat distribution within the project area, resulting in decreased hunting opportunities and satisfaction on public lands, while simultaneously increasing elk-related conflicts on adjacent private lands. The proposed project area includes regions with the highest elk densities within the Heppner Big Game Management Unit. Large numbers of elk frequently migrate from National Forest lands to adjacent private lands in response to disturbances caused by forest users and inadequate cover. Elk are disturbed by motorized roads, and research shows that areas of elk security are those that are greater than ½ mile from open motorized route and at least 250 acres in size. The selected modified alternative includes the lowest percentage of elk security area - just 11% - far below the 30% that has been shown to help improve elk distribution across the greater landscape. ODFW requests clarification on how the elk security calculations were misapplied to this project as stated in the draft Record of Decision (page 1).

Management of motorized access plays a crucial role not only in elk distribution but also in achieving harvest objectives and supporting desired hunting opportunities. During hunting seasons, elk are likely to be displaced from National Forest lands onto nearby private properties leading to decreased hunter access and satisfaction on public lands. Executive order 13443 directs the Department of Agriculture to collaborate with states to conserve wildlife, expand hunting opportunities, and manage game species and their habitats in a manner that respects private property rights and State management authority (Facilitation of Hunting Heritage and Wildlife Conservation, 2007). Current road densities within the Ellis project comply with forest plan standards at the project level, but they do not meet district-level travel management goals (Draft EIS page 93). ODFW recommends that road densities for the Ellis project are evaluated at a sub-watershed level to identify areas of high road densities. The use of strategic road closures, based on time of year and location, can increase elk security while reducing impacts to motorized recreation.

As elk distribution in the region has shifted away from National Forest lands toward private lands, this has exacerbated crop and fence damage on adjacent private properties. The selection of Modified Alternative 2 does not address damage concerns from landowners adjacent to the Ellis project and under the selected Alternative, damage from elk to private lands will not improve (Draft EIS page 94). Landowners, conservation groups, and ODFW staff have been actively engaged in managing the issue of elk distribution in the region, but ODFW recognizes that minimizing elk damage cannot be accomplished without coordination with public land management agencies (Oregon's elk management plan, 2003).

The Ellis Project presents a valuable opportunity to maintain elk distribution on public lands by enhancing forage availability and increasing elk security. But, with the selection of modified Alternative 2, broader issues with elk distribution are expected to persist. The selection of this modified alternative does not meet the purpose and need for the Ellis project as outlined in Draft EIS (page 2, Table 1.1). If the project goals include enhancement of terrestrial wildlife habitat, it must explicitly include considerations of elk security in addition to forage quality and availability.

Elk population distribution is a major issue in eastern Oregon, both due to continued degradation of elk habitat on

public land and corresponding increases in elk populations on adjacent private land. This is a landscape-level issue in need of landscape-level solutions. The Ellis Project was originally intended to be a landscape-level solution. The draft decision is a significant deviation from the outcome that was anticipated from this collaborative project.

Steve Cherry, ODFW District Wildlife Biologist, Heppner, OR steve.cherry@odfw.oregon.gov will be my primary technical contact on this objection.

Sincerely,

Nick Myatt

East Region Manager

Oregon Department of Fish and Wildlife