Data Submitted (UTC 11): 7/16/2025 12:00:00 AM
First name: Mike
Last name: Totey
Organization: Oregon Hunters Association
Title: Conservation Director
Comments: July 16, 2025

Objection Review Officer: Forest Supervisor Eric Watrud
Umatilla National Forest
72510 Coyote Road
Pendleton, OR 97801

RE: OHA Objection to the Final Environmental Impact Statement for the Ellis Integrated Vegetation Management Project

Forest Supervisor Watrud;

The Oregon Hunters Association (OHA) is submitting this Objection to the Final Environmental Impact Statement for the Ellis Integrated Vegetation Management Project (FEIS). Also attached to this correspondence are the comments that OHA previously submitted (dated April 12, 2022) that include the specific items that serve as the basis for our Objection.

The focus of our objection is around the preferred selected Alternative 2 - Modified, and its lack of providing elk security cover and areas. In OHA's comments (April 2022) we specifically commented on the need for "improving forage quantity and quality, particularly for big game. Elk distribution in the geographic area has been an issue for some time. Providing high quality forage along with adequate security cover will begin to address this issue." OHA also referenced the need "to meet or exceed 30% of the area (the minimum) to be in "security", which is the recommendation of subject matter experts based on many scientific studies."

Aspects of the FEIS causing OHA's objection
1)The "Purpose and Need for Action" of the project specifically identifies both elk distribution and elk cover.
The FEIS (page 2 and 3) describe the issue(s) the project is intended to address.
Table 1-1. Purpose and Needs Identified for the Ellis Project area.
Purpose of Project: Improve terrestrial wildlife habitat
Need for change:
*Wildlife habitat is not well distributed and has limited vegetative diversity
*Elk security and forage quality and quantity are limited
*Elk are not staying on the forest and are not fully utilizing spring, summer, and fall ranges
Desired outcomes:
*Improve distribution of elk by: improving security, increasing quality and quantity of forage

The preferred/selected Alternative does not accomplish the stated "Purpose and Need for Action". The Ellis Draft Decision Record (page 4) specifically states this in Table 3. Comparison of Acres and Miles of Road Management Activities and Connected Actions by Alternatives.

Connected Actions: Elk Security acres and (% within project area)
Alternative 2 Modified (Selected): 13,376 acres (11%)

The selected alternative falls short of meeting the desired outcome (identified above) as stated by the forest. Without improvements/increases to elk security cover, most of the "need for change" will not be met.

2) The forest correctly identified a "Relevant Issue" that identified the need for improving elk security cover.

Ellis Draft Record of Decision (May 2025) (Page 3):
"Relevant Issue #4: There is a concern about whether proposed actions will effectively improve or maintain elk habitat and distribution."

Yet the preferred/selected alternative ignores this by failing to improve elk security cover.

3) The selected Alternative is not aligned with the Umatilla National Forest Plan (1990).
OHA respectfully disagrees with the Forest's decision that all alternatives were found to be consistent with the Umatilla National Forest Land and Resource Management Plan (as amended). In the "Findings Required by Other Laws and Regulations" (beginning of page 6 of the Ellis Draft Record of Decision) Table 4. Umatilla National Forest Land and Resource Management Plan (as amended) Management Areas found within the project boundary, the selected Alternative 2 - Modified will not meet the Goals identified in the plan for either C3 - Big Game Winter Range: Manage big game winter range to provide high levels of potential habitat effectiveness and high-quality forage for big game species, or for C4 - Wildlife Habitat: Manage forest lands to provide high levels of potential habitat effectiveness for big game and other wildlife species with emphasis on size and distribution of habitat components
(forage and cover areas for elk, and snags and dead and down materials for all cavity
users) unique wildlife habitats and key use areas will be retained or protected.

The Draft Record of Decision specifically states that the selected Alternative 2 - Modified will continue at the pre-project level of 11% security acres. This cannot improve existing conditions for "cover areas for elk" nor come anywhere near the minimum recommended 30% security cover needed to address elk security issues that have plagued this area for years. Without adequate security cover, elk will be easily pressured to move off of the forest exacerbating the long standing issue of elk damage on neighboring private properties.

Potential Remedies
OHA recommends re-visiting the specific needs of elk to improve habitat and address elk distribution to meet one of the long-standing purpose and needs of the project. These include:
*Continue with prescriptions to manage stands and improve forage.
*Address road densities in specific areas to add quality security areas for elk.
*Consider all available tools, including seasonal road closures and temporary road closures to accomplish this.
*At a minimum strive to reach elk security levels planned for in the original Alternative 2, if not able to reach those at optimum levels.

Supporting information to consider
Elk forage needs and security needs are well studied and documented. The "Travel Management" section of the Oregon Elk Management Plan (ODFW 2003) should be considered. In part, it states:
"It is documented in numerous studies that human access to elk habitat due to increased road density can negatively affect elk habitat utilization and increase elk vulnerability (Perry and Overly, 1977; Lyon and Ward, 1982; Lyon, 1983; Witmer and deCalesta, 1985; Wisdom, 1998; Rowland, et al., 2000). Habitat Effectiveness models developed from these studies all concluded that the effectiveness of habitat for elk declines as road density increases."

OHA wants to see a successful project that meets the wide range of objectives that were originally identified. The Umatilla National Forest has an opportunity to make a meaningful and durable improvement in elk habitat. Not only to improve the existing conditions for elk and other big game, but to create conditions that better address elk distribution. These actions will benefit the public (hunters, wildlife viewers, forest visitors, etc.) and neighboring landowners who have been waiting for this project for years.

Regards,

Mike Totey
Conservation Director
Oregon Hunters Association