



**ROCKY MOUNTAIN
ELK FOUNDATION**

March 12, 2020

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McKenzie River, Oregon 97413

E-mail: <https://cara.ecosystem-management.org/Public//CommentInput?Project=53966>

Subject: Comments – Flat Country Project Draft Environmental Impact Statement (DEIS)

The purpose of this letter is to state the Rocky Mountain Elk Foundation (RMEF) strongly supports the active forest management proposed in the Flat Country DEIS and recommends the selection and implementation of action Alternative 2. We are particularly pleased to note the amount of regeneration harvest that will produce early seral vegetation for several years, and the large acreage of meadow restoration. However, RMEF strongly believes the Purpose and Need for the project needs to specify and include creation of early seral habitat for wildlife. Within the project, the wildlife resource needs to the attention necessary to ensure its protection and restoration for future generations.

The DEIS clearly indicates a need to increase the size and scope of the Flat Country project to enhance early seral vegetation, to reset forest cover to HRV, and for the restoration of habitat needed by wildlife obligated to it. The DEIS states the amount of early seral vegetation in the project area is more or less 1% and well below its historical range of prevalence, citing Swanson et al 2012 that indicates early seral historically represented 5 to 20% of the landscape in the western Cascade mountain range. USFS District Staff indicate that implementation of Alt 2 Preferred would increase the amount of early seral in the project area to 3%, still below HRV. Further, the DEIS acknowledges deer and elk populations are depressed below objective and specific neo-tropical migratory birds are in decline because of lack of early seral, citing Oregon Department of Fish and Wildlife (ODFW) and the Regional Forester's Sensitive Species List.

Deer and elk are designated Management Indicator Species by the Willamette National Forest LRMP for the purpose of indicating the adequacy of the habitat to sustain them and the other early seral obligate species. O'Neil et al 2001 reported deer and elk are

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but two species of more than 100 species obligated to the early seral vegetation type. The Forest's LRMP designates Big Game Emphasis and winter range areas with Standards and guides for their management, and the DEIS indicates the project area includes eight such areas.

Given the DEIS acknowledges paucity of early seral vegetation in the project area, the severely depressed populations of specified management indicator species and the guidance of the Forest's LRMP, there is more than sufficient basis to include early seral creation for wildlife in the Purpose and Need and to increase the scope of the project accordingly.

The DEIS states on page 159 that two key models were used in the analysis (Wisdom 1986 and Rowland et al. 2013). However, the analysis fails to report the results of those models nor how the different alternatives affect the results. In keeping with the best available science, both of the referenced models should be used in the analysis and the results should be reported in order to understand the consequences of each alternative. RMEF continues to urge collaboration with the ODFW District Wildlife Biologist regarding all matters related to wildlife habitat enhancement – particularly forage enhancement and disturbance by human activity.

The Rocky Mountain Elk Foundation is a non-profit conservation organization whose mission is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. The Elk Foundation also works to open, secure and improve public access for hunting, fishing and other recreation.

Thank you for the opportunity to provide scoping comments on this project.

Sincerely,



Bill Richardson
Oregon & Washington Sr. Lands Program Manager
Rocky Mountain Elk Foundation

References:

O'Neil, Thomas A., et al, Matrix for Wildlife-Habitat Relationships in Oregon and Washington. Northwest Habitat Institute. 2001.

Rowland, M., et. al. 2013. User guidelines for application, summary, and interpretation of westside elk nutrition and habitat use models. Draft Version 2.0. U. S. Forest Service Pacific Northwest Research Station, La Grande, Oregon. N. p.

Swanson, Mark E.. Early Seral Forest in the Pacific Northwest: A Literature Review and Synthesis of Current Science. Washington State University, Pullman, Washington. January 11, 2012.

Wisdom, M., L.R. Bright, C.G. Carey, W.W. Hines, R.J. Pedersen, D.A. Smithey, J.W. Thomas, and G.W. Witmer. 1986. A model to evaluate elk habitat in western Oregon. USDA Forest Service, Pacific Northwest Region Report R6-FandWL-216-1986. March 1986.

Reply Refer To: 2600(FS)/6500(BLM) (OR930) I

Date: February 21, 2013

FS-Memorandum

**EMS TRANSMISSION
BLM-Information Bulletin No. OR-2013-**

To: Forest Supervisors, Westside NF, Region 6
District Managers, Westside BLM Districts, Oregon and Washington

Subject: Westside Elk Model

The U.S. Forest Service's (FS) Pacific Northwest Research Station (PNW) recently released two new landscape models that predict elk nutrition and habitat use across western Oregon. These models represent the best available information for evaluating elk habitat on Westside public and forest lands and should be considered in project and land use planning as appropriate.

The elk nutrition and elk habitat use models, reflect key elk research findings from the last twenty years, and will help managers evaluate the nutritional and habitat conditions of Westside landscapes and their likely use by elk. They also can be used to project the effects of land management activities, like road closures and thinning, on this ecologically and economically important ungulate. The models, which are combined in a single downloadable toolbox along with sample datasets, are available online at <http://www.fs.fed.us/pnw/research/elk>.

The models were developed and validated in collaboration with a wide range of partners including the Oregon Department of Fish and Wildlife; the Washington Department of Fish and Wildlife; the National Council for Air and Stream Improvement, Oregon State University, and over twenty other partners. In addition, the models were beta-tested for more than a year by biologists and technicians from a variety of agencies, including the FS and the Bureau of Land Management (BLM).

The modeling team will continue to offer training sessions and other technology transfer activities to help managers with efficient and timely application of the models. For general questions on the Westside elk models, please contact Todd Thompson (t1thomps@blm.gov) or Robert Alvarado (ralvarado@fs.fed.us). For technical assistance, please contact Barb Wales (bwales@fs.fed.us) or Lisa Renan (lrenan@blm.gov). For assistance with BLM National Environmental Policy Act (NEPA) and Land Use Planning, please contact Anne Boeder (aboeder@blm.gov) or, for Forest Plan Amendments, Michael Hampton (mhampton@fs.fed.us).

/s/ *Kent P. Connaughton*
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Regional Forester, Region 6
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/s/ *Jerome E. Perez*
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