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Title:
Comments: The Blue Mountain Chapter, Oregon Hunters Association (BM OHA) is writing to provide input on the Draft Environmental Impact Statement DFEIS) for the Ellis Vegetation Management Project (Ellis Project).

The BM OHA is comprised of members of the Oregon Hunters Association (OHA) located primarily in Umatilla and Morrow Counties. Our mission is protecting Oregon's wildlife, habitat, and hunting heritage.

The Ellis Project proposes to reduce tree density in overstocked stands and improve ecosystem health. The desired outcome of the activities is to enhance landscape resiliency by creating and maintaining diverse vegetative conditions at both the stand and landscape scales. Of the alternatives proposed, we believe Alternative 5 will come closest to achieving the following goals: (1) reduce the risk of uncharacteristic disturbances (wildfire, insect, and disease) to important values that are at risk; (2) enhance unique vegetative communities; (3) provide well-distributed, high quality wildlife habitat for big game (California bighorn sheep, mule deer, and elk), and aid in reducing elk damage to surrounding private agricultural lands; (4) promote the health and safety of public and firefighters; (5) enhancing public and traditional land uses through vegetation management and habitat improvement; and (6) provide jobs and products to support our local communities, all which contribute to our social, cultural, and economic needs.

As described in your analysis there is an increasing problem of too many elk occupying nearby private property causing hardship for livestock and agricultural producers. Elk distribution has been a very difficult and controversial issue. Elk use over time has shifted towards private lands and away from public lands. This has led to reduced hunter opportunity and satisfaction on the public lands and increased problems of elk damage on private lands. Oregon Department of Fish and Wildlife (ODFW) is currently working with many of the private landowners adjacent to the Ellis Project area to reduce elk damage on the private property. OHA and ODFW have specifically met with private landowners in the Gurdane area to discuss an ever-increasing problem of too many elk occupying private property causing hardship for livestock producers. We feel that this issue needs to be addressed from multiple perspectives and one of the key aspects is habitat enhancement performed on the federal lands, both USFS and BLM, which connect to the elk-impacted private land.

We believe the Ellis project can assist in changing this elk distribution shift by creating favorable forage through thinning and burning, as well as reducing open road densities to improve elk security. During most years many of the elk in the northern and eastern portions of the project area have left the public lands before first season elk season ends (October). ODFW and OHA has been working with the Forest Service to keep elk on public lands and accessible to the public hunters and wildlife viewers by utilizing salt sites in the spring to move elk onto public lands from wintering areas, trying to reduce road densities adjacent to private property and encouraging controlled burns to improve forage.

Elk generally are disturbed by roads within a half mile of their location and closing strategic roads in the project area would help create more elk security and assist in maintaining elk on the National Forest for a longer period of time. BM OHA recommends that the Forest Service (FS) create areas of elk security that also includes good forage so that the elk do not have to leave the security areas to find high value forage. The juxtaposition of the thinning, burning and road closures need to be planned so that elk have the best opportunity to fully utilize the resources available in the project area. Creating high quality forage in areas with little elk security would provide less benefit to the elk herd than having high quality forage in an area where elk are secure.

Elk security will be improved by closing or seasonally closing open motorized access. Local research in the Blue Mountains indicate that elk select for areas with increasing distance from open motorized routes, with an average

minimum distance of [frac12] mile (Hillis et al. 1991, Johnson et al. 2005a, Rowland et al. 2000, Rowland et al. 2004). Decreasing disturbance from motorized vehicles will allow elk to utilize available forage and cover during calving and winter seasons, improve distribution across all seasonal ranges and encourage elk to remain on public lands.

We recommend that any roads that are closed as part of this project are closed with physical barriers instead of just road closure signs and maps. Physical barriers are much more effective at keeping areas closed, are easier for the recreating public to understand, and easier to enforce. We recommend seasonal closures begin before the first hunting season in the fall (archery season) and does not end until the end of elk calving and good green up on the public lands (spring).

BM OHA supports the desire to maintain hiding and security cover, while also applying silvicultural actions that stimulate big game forage. We strongly support active forest management and are supportive of thinning and prescribed burning. We do suggest incorporating creation of gaps of 2 to 5 acres to enhance big game forage for a longer period than provided by a normal thinning, these skips, should be carefully incorporated into thinning prescriptions. It was difficult to ascertain in the document if thinning and burning prescriptions would incorporate this. The existing literature does suggest that high quality forage, specifically predicable high quality native forage, can encourage migration off agriculture lands, particularly with the use of fire, timber harvest and livestock grazing strategies to improve forage (Baker et. al. 2019). Mule deer have struggled across the Blue Mountains and maintaining high quality forage, security, and overstory cover is important. It is more difficult to understand the effectiveness of the habitat improvements for both mule deer and California bighorn sheep. There are forage quality improvements with the associated treatments and increased security with the proposed motorized access management.

We support the proposed silvicultural activities to enhance the unique habitats of aspen stands, wet meadows, and sagebrush steppe habitat types. With respect to aspen enhancement, we suggest that all conifers within aspen groves be removed regardless of DBH, (See PNW-GTR-806 Aspen Biology, Community Classification, and Management in the Blue Mountains). We support revegetating all soil disturbed by operations (i.e., skid trails, landings, decommissioned roads, etc.) by seeding with grasses and forbs which will improve forage for big game and livestock, while reducing sedimentation of streams. BM OHA supports amendment of the Forest Plan (and Eastside Screens) to allow harvest of trees greater 21-inch DBH if needed to achieve silvicultural and fire management objectives.

We continue to encourage the FS to partner with the Bureau of Land Management (BLM) and ODFW on adjacent and nearby federal and State (Bridge Creek Wildlife Management Area) lands as to adequately deal with the ongoing issues of elk on private lands lends the larger landscape to address. Including exploring the opportunity, on the BLM proprieties in the North Forest John Day River, to utilize livestock grazing and prescribed fire to improve forage resources for elk. Intercepting and holding elk on public lands is to the benefit of both the members of the public and the adjacent private landowners and exploring all potential options and landscapes to do so is recommended. We feel that these issues need to be addressed both on public and private lands and we were happy to see that several of the purposes of the Ellis Project proposed to address these issues. An important aspect is habitat enhancement performed on all the federal and state lands, both USFS, BLM and ODFW, which connect to the private land being impacted by elk.

Elk redistribution from private back onto public land is a huge issue in the Blue Mountains and across the West and managing the public land is key to making this happen. BM OHA believe that habitat enhancements coupled with increased security (motorized access reductions) will begin to change this dynamic and be a first step in maintaining elk distribution on the public lands. BM OHA supports continued engagement of partner agencies including ODFW, BLM, Tribes, sportsmen/recreation organizations, and adjacent private landowners to look to yield effective results. There will continue to be a need to work with and on the private lands and with key partners to redistribute, both the migratory and now some localized, elk back to public lands (aggressive hazing,

hunting, habitat, security, and forage improvements, etc.). We suggest a monitoring plan be developed to determine the effectiveness of the different strategies on elk movements, so effective strategies can be shared and replicated across the Blue Mountains.

Of the proposed alternatives in the DEIS, BM OHA supports Alternative 5. As the DEIS indicates; Alternative 5 was developed with partners to specifically address elk distribution concerns and develop an alternative 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. Alternative 5 proposes to increase elk security by 21% to a total of 32% of the project area considered as "elk security". We would be interested in the forest exploring additional options and opportunities to increase the amount of elk security and Habitat Effectiveness (HEI), as this proposal is maintaining security at a minimum level.

Alternative 5 does retain 71% of the open road network. Coupling road management with vegetation treatments will help improve elk distribution, encourage their use of public lands, minimize private land agricultural damage, and provide multiple use opportunities in a safe sustainable way while also balancing the needs for wildlife. Alternative 5 is likely the only alternative developed that has the possibility of meeting the Ellis Project's desire outcome and concern of effectively improving the distribution of elk, particularly from the private onto the public lands (FS). The analysis is based on the best available models (science) but again, Alternative 5 only meets the minimum-security needs for elk.

We believe that Alternative 5 best addresses the needs of the highest number of recreation users. We suggest that the largest recreation user on the Umatilla National Forest in this area is the hunting and wildlife viewing public and improving the distribution of elk will improve their experience.

BM OHA appreciates the opportunity to comment and provide support on the proposed Ellis project and we look forward to working with the Umatilla National Forest and others to implement this project and improve the elk distribution and wildlife habitat in the Ellis project area.

[list of references sited included in attached letter]