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Comments:

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RE: North Fork Crooked River Forest Resilience Project # 61651

The Oregon Department of Fish and Wildlife (ODFW) appreciates the opportunity to provide comments on the North Fork Crooked River Forest Resilience Project (Project). The Project proposes forest practices intended to restore resilience to disturbances such as fire and disease across 37,577 acres on the Ochoco National Forest (Forest) ~31 miles east of Prineville, Oregon and 9 miles north of Paulina, Oregon. It is the policy of the State to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations (ORS 496.012). In accordance with this policy and ODFW's mission, we have reviewed the draft Environmental Assessment (EA) and provide the following comments and recommendations to be included in the comment record.

In our scoping comments dated 9/19/2022, the Department stated that there are two cooperative travel management areas (TMA) in the Ochoco wildlife management unit. These two TMAs, South Boundary, located to the west of the North Fork of the Crooked River, and Rager TMA, located east of the North Fork of the Crooked River, have been in existence since 1991 and 1973, respectively. The ODFW and the USFS continue to work collaboratively in the Ochoco National Forest to increase elk security and encourage elk to stay on public land. Currently, there is an ongoing elk monitoring study utilizing GPS collars to inform seasonal habitat use of cow elk on the Forest and surrounding private lands. Simultaneously, the ODFW is collecting vehicle traffic data on Forest roads. These data relevant to the Project can be shared with the Interdisciplinary Team if requested.

The Department acknowledges the reduction of open road density for alternatives 2 and 3 on the general forest to 1.1 miles per square mile and appreciates the Forest's attention to the importance of road closures. ODFW recommends that the Forest ensure that these roads will be obliterated/ effectively closed on the ground as soon as possible. This reduction in roads will have a positive impact on wildlife within the Project area, creating much larger blocks of wildlife habitat and greater elk security.

The Department's specific concerns:

*The current language is difficult to discern what is planned, especially regarding felling trees in the floodplain and in-stream, or where trees will be left standing. For example, Appendix B states some conifers ranging 9-16" diameter breast height (DBH) retained and some conifers ranging 5-9" DBH felled. Another example is the third sentence under Direct and Indirect Effects on page 154, "Trees are proposed to be felled and/or pushed over and placed in-stream and/or along floodplains or higher ground in specified units with RHCA's...". A clearer description of the current conditions and number of trees needed in-stream and in the floodplain for each stream would be preferred, instead of treating the entire project area as one location.

*Most of the discussion only mentions felling trees onto the floodplain so it is unclear if and how many trees will

be placed in-stream or felled onto the floodplain. In addition, it appears the felled trees will only be 5-9" DBH, which isn't sufficient for in-stream placement. The second sentence under Direct and Indirect Effects on page 145 does not match the numbers listed in Appendix B. Page 145 lists all conifers >9" DBH will be retained where Appendix B lists all trees >16" DBH will be retained under the non-commercial thinning prescription. The Department recommends felling larger trees that are hydrologically appropriate for each stream, to meet Inland Native Fish Strategy Environmental Assessment and Decision Notice (INFISH) management objectives since the proposed prescription does not meet the definition for large woody debris (LWD; >12-inches DBH and > 35-feet long).

*It is important to protect the hardwoods so they can reach a large enough size to provide shade that has been eliminated by felling the encroaching conifers. Will the slash fences be used all over the project area or only in select areas, and are 5-9" DBH trees large enough for a fence to exclude cattle? A better description of current conditions would help in the understanding of where the hardwood stands are and if they are in sufficient numbers to quickly replace the felled conifers. Water temperature is already well above standards in many locations and cutting conifers can increase the amount of sunlight hitting the streams causing an increase in water temperature if the hardwoods are not able to quickly replace the conifers.

*Livestock grazing was listed as one of the main contributing factors to the habitat degradation. Will there be any changes to grazing management in the short-term to allow for the hardwoods to recover and fulfill their intended objectives? It is possible there might not be potential for restoration if the limiting factors are not addressed.

*Work is being done to prevent erosion and to increase turbidity to streams. The Department recommends replacing poorly functioning culverts, in addition to closing and decommissioning roads, to supplement the work being done to prevent erosion and increasing stream turbidity.

The Department favors alternative 3, as it does not include commercial thinning in the RHCA's and would ask that the trees used for in-stream and floodplain placement be larger than what is currently in the plan.

Thank you for the opportunity to comment. If you have questions or would like information that the Department can provide, please contact me.

Sincerely,

Jamie Bowles
Regional Habitat Biologist
Deschutes Wildlife District

Cc: Corey Heath, Deschutes Watershed Manager
Greg Jackle, Ochoco District Wildlife Biologist
Tim Porter, Ochoco District Fish Biologist