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Organization:

Title:

Comments: Subject: ODFW Comments on the proposed Battle Bruin Integrated Vegetation Management Project

June 24, 2026

Dear Ranger Simpson,

The purpose of this letter is to provide Oregon Department of Fish and Wildlife's (ODFW) comments on the Umatilla National Forest's proposed Battle Bruin project Proposed Action. In particular, comments refer to potential benefits to mule deer forage, project impacts to elk security, and enhancement of key habitats.

The Battle Bruin project area falls within the Fox Mule Deer Herd Range, identified in the 2024 Mule Deer Management Plan as a herd range of extreme concern (formerly known as the Northside Herd Range). In the project area, reduced disturbance and increasing forest canopy cover have led to declining forage quality for mule deer. Research shows that mule deer select for areas with moderate canopy cover (30-40%) which provide higher forage biomass than denser forested stands. Forest management activities such as commercial logging or thinning for fuels management help to open the canopy and improve forage quality and quantity for mule deer. *ODFW is supportive of large-scale habitat management projects that are designed to improve forage conditions for mule deer and requests opportunities to collaborate on project design and implementation using recent biological data.

Although elk forage may be increased due to project activities, motorized road density remains one of the strongest predictors of elk habitat use, distribution, vulnerability, and displacement. To minimize disturbance, elk require security habitat, areas at least 250 acres in size and ½ mile from motorized roads. Within the Battle Bruin Project area, existing elk security habitat appears to be limited.

*ODFW recommends the Forest Service quantitatively model elk habitat effectiveness, and map and disclose post-treatment elk security habitat.

*ODFW also requests that project activities maintain existing security habitat by implementing measures that prevent motorized use of temporary project roads (e.g. gates, boulders, or other barriers) and by establishing clear timelines for post-project road decommissioning. Elk security can also be maintained through installation of effective barriers and signage, as well as enforcement of the current motorized boundaries during periods of high recreational use.

ODFW appreciates the inclusion of measures to improve key habitats such as late-successional forest, ponderosa pine woodlands, and riparian hardwood areas. These habitats support several Species of Greatest Conservation Need, including white-headed woodpecker, flammulated owl, Lewis's woodpecker, long-legged myotis, and pallid bat. Many of these species depend on diverse riparian areas and late-successional conifer forests, particularly large snags and hollow trees that provide essential roosting and reproductive sites.

*ODFW appreciates the measures for retaining large snags that were referenced on the site visit and recommends that explicit language regarding large snag retention be incorporated into the project documents.

ODFW appreciates the opportunity to comment on the Battle Bruin project activities.

Sincerely,

Lindsay Somers
Regional Habitat Biologist
Oregon Department of Fish and Wildlife