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US Bureau of Land Management
Western Oregon Plan Revisions
PO Box 2965
Portland, OR 97208

Subject: Comments on the Draft Environmental Impact Statement for the BLM, Western Oregon Plan Revisions (WOPR)

The Oregon Hunters Association provides the following comments on the Draft Environmental Impact Statement (DEIS) for the Western Oregon Management Plan Revision (WOPR).

General Comments:

The Oregon Hunters Association is a statewide organization of approximately 11,000 members with the mission, "To provide an abundant huntable wildlife resource in Oregon for present and future generations, enhancement of wildlife habitat, and protection of hunters rights". The DEIS was review in view of this mission and OHA would like to voice several concerns.

The President of the United States signed an executive order on August 17, 2007, titled "Facilitation of Hunting Heritage and Wildlife Conservation". This executive order should be considered during the preparation and publication of the final EIS, in particular as it pertains to Recreation and Wildlife on public lands.

The DEIS fails to address wildlife adequately with the exception of threatened and endangered species. This exclusion of other wildlife is very concerning to this organization. There is emphasis on thermal cover and this is recognized as not being the limiting factor when addressing the decline in large game species in western Oregon. The limiting factor in big game numbers is clearly recognized to be forage. The lack of forage can and has been tied to the reduction of timber harvest west of the Cascades on public lands. Early seral stage forests provide the habitat essential for elk, deer and many other species of native Oregon wildlife. The following was provided by the Willamette national forest as it pertains to numbers of species obligated to different age forest. There are 17 species obligated to old growth (200-600 yr old forest), about 14 obligated to late seral (80-200 yr old forest), 0 species obligated to mid seral forest (30-80 yrs old), and 71 species obligated to early seral forest 0-20 or 30 yr old forest in some locations and 116 species which are generalists and occupy all seral stages of development. These facts indicate the importance of early seral forest for all wildlife and not just huntable big game species.

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The Oregon Department of Fish and Wildlife (ODFW) has reported a major decline in Blacktail deer population across its complete range in western Oregon, including public lands managed by BLM and covered by the WOPR. This decline has been directly related to the decline in early seral habitat. ODFW reports the mule deer population at 50% of management objective. The elk population west of the Cascade crest is reported at below management objective in 16 of the 22 wildlife management units west of the Cascade crest. These declines in large wildlife species are not address in the DEIS or even mentioned.

Fishing, hunting and wildlife associated recreation in the DEIS needs to be more comprehensive. An excellent reference that provides information on wildlife recreation expenditures is the US Fish & Wildlife Service's "2006 National Survey of Fishing, Hunting and Wildlife Associated Recreation". This document clearly indicates that these activities need to be covered in a more comprehensive manner throughout the DEIS.

Comments That Relate to Specific Pages of the DEIS:

- **Management Objective page 61, Volume I:** We are pleased to see a management objective that states "Assist the ODFW in meeting big game management goals.....where the goals are consistent with the O&C Act." Our recommendation is the replace the words "big game" with the words "wildlife" in recognition of that agency's full range of responsibilities.
- **Management Objective, Management Actions page 61, Volume I:** We suggest adding a Management Action stating "BLM would continue to collaborate and cooperate with ODFW in the implementation of its several species specific wildlife management plans and in implementation of the Oregon Conservation Strategy Plan."
- **Management Objective, Management Actions page 61, Volume I:** Invasive species and a program to control them should be included as an action item in this section of the DEIS. We realize invasive species is covered in detail starting on page 268.
- **Socioeconomics (page 216, Volume I and page 534, Volume II):** This section could benefit with the addition of dollar values for recreation activities like hunting, fishing, wildlife viewing, and tourism in general, which do in fact contribute to the revenue to the local economies. It is very likely recreation values on the BLM lands produce more revenue to the counties' economy than special forest products. An excellent reference that provides information on wildlife recreation expenditures is the US Fish & Wildlife Service's "2006 National Survey of Fishing, Hunting and Wildlife Associated Recreation".
- **Botany (page 257, Volume I and page 593, Volume II):** This section could benefit with increase of focus to include meadow habitats and grassed high elevation areas as both are in critical short supply and they are essential to the

existence of a wide range of plant and animal species. Addition of goals/objectives to maintain and enhance meadows is suggested.

- **Invasive Plants (page 268, Volume I and page 611, volume II):** The text acknowledges the presence of invasive plants, assesses risk of spread and provides for management actions to reduce the spread of them, but it does not provide management actions to directly remove. It is suggested that management actions be added to the document that provide for direct attack of invasive plants where they impact important wildlife habitat.
- **Mule/Black-tail Deer (page 330, Volume I):** With the recognition of the importance of habitat in this section it needs to be changed to clearly and completely address deer across the full planning area. It would seem appropriate in this section to address ODFW's assessment that blacktail deer and mule deer populations are in decline throughout the planning area in part due to declining forage quantity and quality, and to address how BLM might through habitat management actions will assist ODFW to stop the decline.
- **Mule/Black-tail Deer (page 332, Figure 77 Volume I):** This figure is confusing why are the areas indicated the only ones addressing "Deer Management Area". Does this indicate that deer are not to be managed in the rest of the lands managed by BLM? Why are there no deer habitat management areas in the north half of the planning area? The BLM has designated deer habitat management units only in the southern three BLM districts, basically the southern half of western Oregon. Planning area. It would seem appropriate to address the issue across the full planning area, given blacktail deer populations are in decline throughout the planning area. We encourage BLM to collaborate with ODFW in establishing deer habitat management areas in the north half of the planning area if there is a need.
- **Elk (page 332, Volume I):** Elk nutrition is widely accepted by wildlife professionals to be the critical limiting factor for Roosevelt elk in western Oregon and should be addressed here. Also, it is suggested to add discussion of the habitat needs identified in ODFW's Elk Management Plan and how the BLM will work with ODFW to provide those needs.
- **Elk (page 332, Volume I):** Again there is the same omission as in the deer management areas. Why are there no elk habitat management areas in the north half of the planning area, except two in the Salem district? Again it would seem very appropriate to consult with ODFW and to added elk habitat management units in the northern half of the planning area; as well as taking other actions to provide forage, cover and limit disturbance on winter range and in late spring in traditional calving areas.

- **Deer (page 683, Volume II):** It appears from Figure 235 and Figure 236 that only three districts are addressed in this section the “Coos Bay, Medford, and Klamath Falls”. Where is the data for the other BLM Districts in the WOPR area?
 - There is no analysis of the impact or comparison of the impact of the alternatives upon deer habitat across the entire planning area. This is a serious short-coming that must be corrected before the final EIS.
 - This entire section seems to discuss impact on the North Bank Habitat Management area and the 21 deer habitat management units, yet there is information scattered through it that may be intended to apply to the entire planning area. If there is planning area wide information to be communicated it must be clearly identified to the reader. This entire section will benefit from organization of its contents.
 - This section does not acknowledge ODFW’s contention that blacktail deer populations are in decline across their full range within the BLM’s planning area. The mule deer population being only at 50% of ODFW management objective within the planning area should also be acknowledged.
 - The habitat, forage and cover, needs expressed in the ODFW Mule Deer Management Plan and Blacktail Deer Management Plan should be acknowledged in the document, and analysis of how well each action alternative will provide for those needs.

- **Deer (page 684, Volume II):** Some analysis of the impacts on deer habitat is provided for a few of the designated deer habitat management units. The text indicates that forage habitat will decline under the No Action Alt. and Alt. 1 and 2 and increase under Alt. 3, however no explanation of how this conclusion was reached. Is this accurate? Given forage habitat increases are stated to result from regeneration harvest and that that annual harvest volumes for all three action alternatives increase over the NO Action Alternative, Alt 2 with the greatest harvest increase, why does this occur? If there will in fact be a decrease in forage habitat, then under FLPMA the BLM has a responsibility to take action to provide adequate forage.

- **Deer (page 685, Volume II):** This section is very concerning to OHA. The last sentence on the page “Intensive forest management on intermingled private forestlands would provide more foraging habitat per unit area than BLM-administered lands, because the foraging habitat would last longer.” Our experience is that private property owners are more concerned with growing trees and not providing wildlife forage. They use spray to remove unwanted vegetation in some cases which all but eliminates forage for some time after the spray is

applied. This seems to include the implicit assumption that private forest lands will provide early seral forage if the BLM did not do so on its lands, and that the private lands would provide more of it. If this interpretation is correct, then the question arises, is not the BLM required under FLPMA to provide adequate wildlife forage and cover on its lands? The assumption the private lands can provide the early seral stage habit under represented on the federal lands is refuted by information located on pages 196 and 206 of Volume I.

- **Deer (page 689, Volume II):** Forage should be given greater emphasis in this section. The latest science has identified quantity and quality of forage as a critical limiting. Throughout this section thermal cover is given a high profile in the analysis of the deer habitat management units, probably to much emphasis given the relative abundance of cover on BLM lands. Hiding cover is not discussed at all and it needs to be addressed. However, ultimately the text does recognize forage as the critical in factor in determining deer population. Deer forage quantity and quality needs to be given much greater emphasis.
- **Elk (page 689, Volume II):** Why does Figure 238 only cover one BLM District?
 - There is no analysis or comparison of the impacts of the alternatives upon elk habitat, forage areas, hiding cover, thermal cover, across the entire planning area. This is a serious short-coming that should be corrected before the final EIS.
 - The DEIS this section not answer Analytical Question Number 7 (page 83, Proposed Planning Criteria and State Directors Guidance). What levels of elk habitat will be available under each alternative? The planning area was to be modeled for each alternative using the “Wisdom Model” to provide a comparison of each alternative’s impact upon elk habitat availability. Current science acknowledges the Wisdom Model has serious shortcomings in that it under values forage. Not having a planning area-wide impact analysis is not the answer. Some form of objective planning area-wide impact analysis for elk habitat is necessary prior to the final EIS.
 - This section appears to analyze a small number of the 16 elk habitat management units, but not all of them. This incomplete analysis is insufficient to understand how the alternatives will impact across the full planning area.
 - The manner in which this section is organized does not make it abundantly clear which statements in the text are attributed to the various elk habitat management units analyzed or whether they are applicable to all 16 elk habitat units, or possibly intended to apply to the entire planning area.

- This section should the elk population is below ODFW management objective in 16 of the 23 ODFW wildlife management units within BLM the planning area.
- This section should acknowledge the habitat, forage and cover, needs expressed in the ODFW Elk Management Plan, and analyze how well each action alternative will contribute provision for those needs.
- **Elk (page 690, Volume II):** Thermal cover is given high profile in the analysis and this emphasis his hard to understand given that on page 332, Volume I, there is written a citation attributed to (Cook, et al, 1998) that states the no positive effects were demonstrated by thermal cover, and in fact possible negative effects may occur. Thermal cover is not in short supply on the BLM planning area; this is clearly substantiated in the Ecology section of the DEIS.
- **Elk (page 690, Volume II):** Forage needs to be given the highest profile in this impact analysis. The importance is substantiated in current elk nutritional science literature for Roosevelt elk in western Oregon. It is strongly recommended BLM contact the USFS at the Pacific Northwest Forest and Range Experiment Station in LeGrande, Oregon, for assistance in obtaining the latest science.
- **Elk (Page 691, Volume II):** The last three sentences of the first paragraph seem to include the implicit assumption by the BLM that private forest lands will provide early seral forage if the BLM did not do so on its lands. If this interpretation is correct, then the question arises, is not the BLM required under FLPMA to provide adequate wildlife forage and cover on its lands? The assumption the private lands can provide the early seral stage habit under represented on the federal lands is refuted by information located on pages 196 and 206 of Volume I.
- **Recreation (Page 775, Volume II):** Sensitive big game habitat such as critical forage areas, wintering range and calving areas must be avoid in selecting OHV recreation areas, camping areas and other recreation facilities. Additional OHV recreation areas area proposed for all action alternatives. Given the BLM's understanding of the adverse impacts of disturbance on deer and elk sections displayed in those sections of Chapter 4, it is strongly suggested the BLM and ODFW wildlife biologists collaborate and cooperate on the sight selection for new OHV areas.

Sincerely,



Fred Craig
President, Oregon Hunters Association