



July 27, 2011

Stephanie Kelleher,  
BLM – Medford District  
Ashland Resource Area  
3040 Biddle Road  
Medford, OR 97504

E-mail [SKellehe@BLM.Gov](mailto:SKellehe@BLM.Gov)

Subject: Comments - Pilot Joe Demonstration Project EA

The purpose of this letter is to submit the Rocky Mountain Elk Foundation's comments on the Pilot Joe Demonstration Project Environmental Assessment (EA).

Comment 1: The Elk Foundation believes Section 7.0 Wildlife (page 3-70) of the draft EA is not adequate because it does not contain a comprehensive assessment of wildlife impacts; only threatened and endangered (T&E) species are addressed. Project impacts upon black-tailed deer and Roosevelt elk are not addressed. We strongly suggest that a comprehensive analysis of project impacts upon deer, elk and other non-T&E species and wildlife habitat be completed and included in the final EA document. Black-tailed deer within the proposed project area are below ODFW's bench mark; the elk population is low as well. There are ODFW Management Plans for Black-tailed Deer and Elk, each of which indicates lack of quality early seral forage habitat is a contributing factor to the low deer and elk populations in western Oregon.

Comment 2 – The Elk Foundation strongly recommends the BLM actively seek comments on this project from the Southwest Region of Oregon Department of Fish and Wildlife (ODFW) before completing the final EA. There is no indication in the draft EA that the BLM has collaborated or coordinated with the ODFW regarding this proposed project during its development and analysis. Chapter 4 – Public Involvement and Notification (page 4-1) does not indicate ODFW was sent a copy of the draft EA.

Comment 3 – The Elk Foundation suggests monitoring response of non-T&E wildlife to the habit changes the project produces, specifically the response of deer, elk, and game birds



Comment 4 - We wish to bring to the BLM's attention Presidential Executive Order 13433 - Facilitation of Hunting Heritage and Wildlife Conservation, dated August 16, 2007. Particular attention should be given to Section 2 of the order when completing the final EA.

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

Sincerely,

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

CC

Larry Cooper, ODFW Southwest Regional Manager  
[larry.d.cooper@state.or.us](mailto:larry.d.cooper@state.or.us)