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Comments on the Draft Environmental Impact Statement for the Western Oregon Plan Revisions

The Rocky Mountain Elk Foundation (RMEF) would like to take this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Western Oregon Management Plan Revision (WOPR).

The mission of the Elk Foundation is to ensure the future of elk, other wildlife and their habitat. Our mission aligns with many aspects of the Bureau of Land Management (BLM) mission, as we are both concerned with healthy wildlife habitat. Maintaining and enhancing elk habitat benefits a wide variety of big game, upland game birds, song birds, raptors, fur bearers and aquatic species.

Early seral habitat has been declining rapidly on federal lands west of the Cascade crest for more than a decade and a half due to a federal forest management policy of greatly reduced timber harvest, and rapid crown closure of reforested harvest units. Early seral plant communities provide the forage habitat essential for elk, deer and many more species of native Oregon wildlife.

The Oregon Department of Fish and Wildlife (ODFW) reports the blacktail deer population is in decline across its range in western Oregon, including within the BLM's western Oregon planning area, in part due to loss of early seral habitat. ODFW reports the mule deer population at 50% of management objective. ODFW reports elk populations are below management objective in the majority of wildlife management units west of the Cascade crest. There is a need for action.

The planned increase in timber harvest under any of the three action alternatives analyzed in the DEIS will provide opportunity to increase early seral vegetation on BLM's lands. Alternative 2, the Preferred Alternative, has the highest harvest level and will be the most beneficial to early seral obligated wildlife species, including deer and elk. Alternative 2 will produce the greatest increase in acreage of early seral forage habitat, and therefore RMEF recommends it be favorably considered for adoption.

Given RMEF's interest in maintenance and enhancement of wildlife habitat we make the following comments regarding the content of the Draft Environmental Impact Statement for the Western Oregon Management Plan Revision:

- The President of the United States sign an executive order on August 17, 2007, titled Facilitation of Hunting Heritage and Wildlife Conservation. This order should be considered and acted upon during the preparation of final EIS, particularly regarding Recreation and Wildlife.
- The Recreation and Wildlife sections throughout the DEIS would benefit from a more comprehensive approach. Where appropriate, management goals and objectives should be added to provide guidance for the implementation of the plan. The same suggestions apply to Botany and Invasive species sections.
- Wildlife (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." Please consider replacing "big game" with "wildlife" in recognition of ODFW's full range of responsibilities, and insert "and FLPMA" after "O&C Act".
- Wildlife (page 61, Volume I): Regarding the management objective to assist ODFW and related management actions, consider adding a Management Action stating "BLM will continue to actively collaborate and cooperate with ODFW in the implementation of its several species specific wildlife management plans and the Oregon Conservation Strategy plan."
- Socioeconomics (page 216, Volume I and page 534, Volume II): This section would benefit with analysis of dollar values for recreation activities like hunting, fishing, wildlife viewing, and tourism in general, all of which contribute to local economies. Recreation on the BLM lands is extremely valuable to county economies.
- Botany (page 257, Volume I and page 593, Volume II): This section would benefit by including consideration of meadow habitats and grassed high elevation areas as both are in critical short supply and are essential to the existence of a wide range of plant and animal species. Consider addition of management objectives and actions to maintain and enhance meadows.
- Invasive Plants (page 268, Volume I and page 611, volume II): Consider the addition of management actions that provide for direct attack of invasive plants that impact important wildlife habitat. The text recognizes the presence of invasive plants, accesses risk of spread and provides management actions to reduce spread, but fails to provide management actions to directly remove invasives.
- Wildlife (beginning page 282, Volume I): ODFW has a planning document titled the Oregon Conservation Strategy the objective of which is to stem habitat decline and maintain populations of sensitive species. Consider stating in this section how the BLM will work with ODFW to achieve their common goals.
- Mule/Black-tail Deer (page 330, Volume I): This section needs to clearly and completely address deer across the full planning area. This section needs to address ODFW's assessment that blacktail and mule deer populations are in decline throughout the planning area. The section should address how BLM management actions will assist ODFW to stop the decline in forage quantity and quality.

- Mule/Black-tail Deer (page 330, Volume I): Add a discussion of the habitat needs found in both the ODFW Mule Deer Management Plan and the ODFW Blacktail Deer Management Plan, and how the BLM will work with ODFW to provide improved deer habitat.
- Mule/Black-tail Deer (page 331, Volume I): The BLM has designated deer habitat management units only in the southern three BLM districts, basically the southern half of western Oregon Planning area. BLM needs 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.
- Elk (page 332, Volume I): Nutrition is widely accepted by wildlife professionals to be the critical limiting factor for Roosevelt elk in western Oregon and should be addressed here. 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): Consult with ODFW to add 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. BLM's planning should encompass elk habitat throughout the planning area.
- Deer (page 683, Volume II):
 - There is no analysis or comparison of the impact of alternatives on deer habitat across the entire planning area. This is a serious short coming that should be corrected before the final EIS.
 - Clearly identify planning area-wide information. This section discusses impact on the North Bank Habitat Management area and the 21 BLM deer habitat management units, yet there is information scattered through it that may be intended to apply to the entire planning area. This entire section would benefit from organization of its contents.
 - This section lacks consideration of ODFW's assessment that blacktail deer populations are in decline across the full range of the BLM planning area. Acknowledge mule deer populations at only 50% of ODFW management objective within the planning area.
 - 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, with analysis of how each action alternative will provide for those needs.
- Deer (page 684, Volume II): This section needs more complete analysis. Examination of the impacts on deer habitat is provided for only 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, with no explanation of how this conclusion was reached. 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, this conclusion seems

unsupportable. 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): The last sentence on the page includes the 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. The BLM is required under FLPMA to provide adequate wildlife forage and cover on its lands. The assumption the private lands can provide the early seral stage habitat under represented on the federal lands is refuted by information located on pages 196 and 206 of Volume I.
- Deer (page 689, Volume II): The first sentence indicates the action alternatives will produce a 50% increase in deer population at the end of 50 years, contradicting statements made on page 684.
- 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 factor for deer populations. Throughout this section thermal cover is given a high profile in the analysis of the deer habitat management units, notwithstanding the relative abundance of thermal cover on BLM lands. Hiding cover is not discussed and needs to be addressed. The text does recognize forage as a critical in factor in determining deer population late in the discussion, yet places highest emphasis on thermal cover. Deer forage quantity and quality on BLM lands needs to be given much greater emphasis.
- Elk (page 689, Volume II):
 - There is no analysis or comparison of the impacts of the action alternatives on elk habitat, forage areas, hiding cover, or thermal cover across the entire planning area. This is a serious short coming that should be corrected in the final EIS.
 - This section of the DEIS did not answer the BLM's own 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 indicates the Wisdom Model has serious shortcomings as it under values forage. Even so, some form of objective planning area-wide impact analysis for elk habitat is necessary in the final EIS.
 - This section appears to analyze a small number of the 16 BLM elk habitat management units, but not all of them. This incomplete analysis fails to show how the alternatives will impact habitat across the full planning area.
 - It is not clear which statements in the text are applicable to the various elk habitat management units analyzed or whether they apply to all 16 elk habitat units, or possibly to the entire planning area. A reorganization to clarify the information presented is recommended.
 - This section should acknowledge that elk populations are below ODFW management objective in most ODFW wildlife management units within the BLM planning area.

○ This section should acknowledge the habitat, forage and cover needs expressed in the ODFW Elk Management Plan, and analyze how each action alternative will contribute to those needs. Consider adding management objectives and actions for elk habitat.

- Elk (page 690, Volume II): Thermal cover given high profile in the analysis, contradicting information on page 332, Volume I that states the no positive effects were demonstrated by thermal cover, and in fact possible negative effects may occur (attributed to Cook, et al, 1998). Thermal cover is abundant in the BLM planning area; substantiated in the Ecology section of the DEIS.
- Elk (page 690, Volume II): Forage for elk 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. Consider contacting the USFS at the Pacific Northwest Forest and Range Experiment Station in LaGrande, Oregon, for assistance in obtaining the latest science.
- Elk (Page 691, Volume II): The last three sentences of the first paragraph include the assumption that private forest lands will provide early seral forage if the BLM did not do so on its lands. The assumption is contradicted by information located on pages 196 and 206 of Volume I. BLM is required under FLPMA to provide adequate wildlife forage and cover on its lands.
- Recreation (Page 775, Volume II): Sensitive big game habitat such as critical forage areas, wintering range and calving areas must be avoided in selecting OHV recreation areas. Additional OHV recreation areas are proposed for all action alternatives. Given the adverse impacts of disturbance on deer and elk displayed in those sections of Chapter 4, consider adding a management action stating that BLM and ODFW wildlife biologists will collaborate and cooperate on site selection for new OHV areas.

The Elk Foundation and our agency partners initiated a collaborative effort in 1996 to map all of elk country. These maps include occupied elk habitat, winter range, crucial winter range, summer range, or crucial summer range. We encourage the BLM to consider the **M.A.P. Habitat** (Measure, Assess and Prioritize) data for Oregon as the BLM prepares the final EIS for WOPR.

The Rocky Mountain Elk Foundation appreciates the opportunity to comment on the DEIS for the WOPR. We value our partnership and will continue to support your planning efforts. We also encourage you to contact our Lands and Conservation Department, to seek opportunities to partner with Stewardship Contracting or Agreements, or to apply for grants from the RMEF to help implement wildlife habitat conservation at the project level throughout elk country. In the event the BLM requests additional information or assistance from the Elk Foundation in its planning efforts, we will be happy to assist.

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