



April 15, 2019

Dan Olsen
Daniel Boone National Forest
1700 Bypass Rd.
Winchester, KY 40391
Email: comments-southern-daniel-boone@fs.fed.us

Re: Daniel Boone National Forest Amendment Environmental Assessment

Dear Mr. Olsen,

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the Daniel Boone National Forest Plan Amendment and submits the following for consideration.

The mission of RMEF is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. Healthy wildlife habitat is one of our core values, and we're keenly interested in taking part in the planning process at the Regional and Forest level. The majority of wild free-ranging elk in the United States spend a portion of their lives on National Forests and Grasslands. Maintaining and enhancing elk country benefits a wide variety of wildlife including big game, upland game, waterfowl, song birds, and many aquatic species. Nearly all of our 235,000 members are hunter-conservationists and many pursue their hunting heritage on National Forests. This aligns with many aspects of the Forest Service mission as well.

RMEF supports actively managed landscapes based on the best available science. Past and recent research has identified several challenges to North America's elk country, including unnaturally dense forests, invasions of noxious weeds, lack of dependable water sources, and many others. RMEF supports use of the past 25+ years of research from the Starkey Project and other studies that have laid the groundwork for managing healthy elk habitat. Early seral forest provides important habitat for elk and other wildlife, and is often achieved following disturbance such as fire or mechanical thinning. Decades of fire suppression have reduced or nearly eliminated early and mid-seral successional stages across the National Forest System. RMEF supports the use of mechanical thinning and prescribed burning to encourage growth of grasses, forbs, young shrubs, and trees which provide critical forage and cover for elk and other species. Prescribed burns not only improve elk habitat, but can help reduce the threat of catastrophic wildfire in the future.

RMEF supports specific actions outlined in the proposed Forest Plan Amendment that would increase the ability and flexibility of achieving active management. Prescribed fire seasons would be extended, which provides a new tool for reaching desired future conditions. Prescribed fire is a tool used to meet forest management objectives including hazardous fuel reduction, wildlife habitat improvement, and insect/disease control. In addition, changes to the Forest Plan would allow vegetation management to occur within the Forest year-round. Expansion of harvest

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ability will provide flexibility in actively managing forests for early seral habitats. Removal of vegetation in harvest units will allow understory vegetation to flourish from increased sunlight reaching the forest floor. RMEF supports the proposed changes to prescribed burning and vegetation management. Young stands with diverse understory vegetation will be beneficial to a suite of species including elk, songbirds, turkeys, and many others.

Finally, RMEF agrees that the proposed amendment will not likely impact mammal species occurring in the Forest, as stated: “Many individual species occur throughout the Forest and would continue to be protected by existing Forest Plan Standards. The proposed action will not increase levels of Forest Management above those analyzed during the 2004 Plan. Given the relatively small percentage of acres treated across the Forest annually and the widespread occurrence of suitable habitat for terrestrial mammals, it is unlikely that the Proposed Action would result in a significant impact, loss of viability or changes in population to any mammal species.”

RMEF works closely with each state’s wildlife agency. These agencies are our vital partners. In setting new management directions for elk habitat in forest plans and project design, we encourage that the forest planning effort be coordinated with state wildlife agencies and that state agency goals for elk are integrated into the discussion.

Thank you for the opportunity to review and provide comments on an important proposed Forest Plan Amendment.

Sincerely,

Karie Decker
Director of Habitat Stewardship Programs