Region 2 Office
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October 7, 2019

Seth Carbonari, District Ranger
West Fork Ranger District
Bitterroot National Forest
1801 N First St
Hamilton, MT 59840
https://cara.ecosystem-management.org/Public//CommentInput?Project=55744

Subject: Mud Creek Vegetation Management Project #55744--Scoping

Dear Mr. Carbonari:

Montana Fish, Wildlife & Parks (FWP) appreciates the opportunity to provide information on the fish, wildlife and recreation resources in the vicinity of the Bitterroot National Forest's (BNF) proposed Mud Creek Vegetation Management Project, located west and north of Painted Rocks Reservoir in Ravalli County.

The Mud Creek project area includes important habitat for a variety of game species, especially mule deer, elk, and one of the Bitterroot Valley's few herds of bighorn sheep (Painted Rocks herd). Populations of all three species in the West Fork hunting district (HD) 250 have struggled over the last decade, due to a combination of factors including predators, overharvest, and lower forage quality/availability as compared to nearby habitats such as the Sapphire Mountains. These three species may only be harvested by limited availability (drawing) permit or license in HD 250. The elk population, most recently surveyed at 901 animals, remains well below its population objective of 1,400, while the bighorn sheep population has held steady at around 75 animals since the last reintroduction effort in the early 2000s. The mule deer population is not surveyed, although harvest rates on the 25 available antlered-buck permits are poor to mediocre, at just 39% last season and averaging 45% over the last 5 years (compared to 82% in the neighboring East Fork HD 270).

While any forest management project may remove hiding/thermal cover for game species during the hunting season, the resulting boost in understory forage production—especially if fire is reintroduced to the landscape—should increase overwinter survival and recruitment of young. Ideally it should also reduce the tendency for some herds--especially elk---to seek high-quality forage on private croplands throughout the year (which currently occurs along the Nez Perce corridor). Fire suppression in part has resulted in conifer expansion and dense understory growth on south-facing slopes and meadows. The bighorn sheep herd particularly appears to rely on the large expanses of open, grassy slopes in the Little Blue Joint Creek drainage for both forage and predator avoidance. This kind of habitat could be restored to nearby drainages with this forest management project.

The project area is one of the most heavily roaded areas in the forest. All game species would be expected to benefit from road closures (permanent and/or seasonal), which would lead to decreased harvest mortality and seasonal human disturbance (such as during lambing/fawning/calving seasons). The current density of roads is extensive, and eliminating (by obliterating or storing) many of the redundant roads and road spurs along lower- and higher-elevation contours should not overly impact forest access. FWP encourages the BNF to

consider with caution, any proposed new permanent motorized and nonmotorized roads, loops and/or trails in this project area. Such proposed roads or trails (including, e.g., mountain bike) would need to be carefully weighed against possible impacts to wildlife and fisheries resources and habitat.

FWP would like to emphasize:

- Implementation of long-term fire management and an end to actively suppressing fires under full-suppression practices where feasible, and
- maintenance of a mosaic of habitat types across the landscape, to benefit a wide variety of wildlife species across seral stages and to provide natural barriers to catastrophic events such as stand-replacing fires and disease/insect outbreaks.

Please feel free to contact our area staff for any needed consultation related to this proposal:

- Rebecca Mowry, area wildlife biologist (406-363-7141; rmowry@mt.gov)
- Jason Lindstrom, Bitterroot fisheries biologist (406-363-7169, jason.lindstrom@mt.gov)
- Loren Flynn, regional parks manager (406-542-5517, lflynn2@mt.gov)

Thank you for providing the opportunity for FWP to offer input on this project.

Sincerely,

Randy Arnold
Regional Supervisor

RA/sr