



January 17, 2020

Bitterroot National Forest
Attn: Forest Plan Amendment
1801 N. First Street
Hamilton, MT 59840

Re: Bitterroot National Forest Plan Programmatic Amendment

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the proposed programmatic amendment for elk habitat objectives under the 1987 Forest Plan (Plan). The mission of RMEF is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. RMEF's 234,000+ members include hunters, ranchers, guides, outfitters, other business owners, wildlife enthusiasts, and other conservationists who have both recreational and economic interests in hunting and enjoying elk on National Forests. Since its creation in 1984, RMEF has permanently protected and enhanced more than 7.6 million acres of North America's most vital habitat for elk and other wildlife, including over 850,000 acres in Montana. As such, RMEF has an interest in ensuring the future productivity of elk and other wildlife in Montana.

RMEF recognizes the need to periodically update Plan objectives in order to meet current recommendations and we appreciate the effort to revise management actions based on the most recent research.

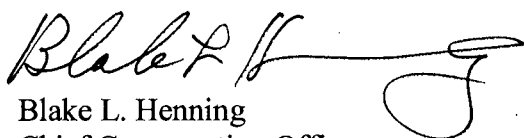
We request the following recommendations be considered in the Programmatic Amendment:

- RMEF works closely with each state's wildlife agency. These agencies are our vital partners. In setting new management directions for elk habitat, we encourage that the forest planning effort be coordinated with Montana Fish, Wildlife & Parks (FWP).
- 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 (Quigley and Wisdom 2015). More recent research on ungulate migration (Sawyer et al. 2013, Middleton et al. 2013), nutrition (Cook et al. 2013, Rowland et al. 2018), and elk security (Ranglack et al. 2017, Wisdom et al. 2018) continue to build on this foundation. RMEF recommends that the Plan incorporate recent research on the benefits of actively managed landscapes and relevant components of Executive Order 13855 on active management on America's forests (2018).

- The Scoping Letter discusses the difficulty in measuring thermal cover and suggests it is not a necessary requirement for elk (Cook et al. 1998). This research, along with further reviews (Cook et al. 2005), highlighted the need to consider thermal cover in relation to that of other habitat attributes and the need for habitat managers to focus on forage and security. RMEF recommends incorporation of recent research showing the importance of nutrition (Cook et al. 2013, Rowland et al. 2018, Lehman et al. 2019, Spitz et al. 2019) as well as elk security (Ranglack et al. 2017, Wisdom et al. 2018).
- Difficulty in measuring hiding cover is also discussed in the Scoping Letter. Elk and many other wildlife species are sensitive to human travel patterns, especially motorized use. Research from the Starkey Project has done much to quantify effects of roads, trails, and associated motorized travel (Wisdom et al. 2005, Rowland et al. 2005). In addition, various studies have shown vulnerability of elk to hunting (Proffitt et al. 2013, Ranglack et al. 2017, Spitz et al. 2019) and other types of recreation (Wisdom et al. 2018). As suggested in these studies, elk security should be one of several habitat components to consider in managing for healthy elk populations. In addition, RMEF recommends review of recent research in the Bitterroot Valley showing the importance of balanced travel management and high forage quality for managing elk populations (Devoe et al. 2019).
- The Scoping Letter suggests that elk populations are over objective in most units. RMEF encourages reference to the 2019 FWP elk population status reports showing a mixed status of within, below, and above elk population objectives in the Bitterroot National Forest. Much of the perception of over objective populations may be driven by the changing distribution of elk in the Bitterroot Valley. RMEF encourages consideration of recent research conducted by FWP showing increased elk use of lower-elevation private lands in the North Sapphire area (Proffitt et al. 2017). Elk distribution on private lands during the hunting season limits the effectiveness of public hunting efforts to help move the population toward objective. RMEF suggests working in collaboration with the Lolo National Forest and FWP to enhance nutritional resources on Forest lands, while developing hunter-based strategies to help redistribute elk onto public land where management through hunting can be more effective.
- Early seral forest provides important habitat for elk and other wildlife, and is often achieved following disturbance such as fire and mechanical thinning. Decades of fire suppression have reduced early 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 that provide critical forage and cover for elk and other species (Swanson et al. 2011). Prescribed burns not only improve elk habitat, but also can help reduce the threat of catastrophic wildfire in the future. RMEF supports this work that complements Forest Service fire, fuels, and vegetation management goals.

RMEF appreciates the opportunity to provide comments on the proposed programmatic amendment for elk habitat objectives under the 1987 Bitterroot National Forest Plan.

Sincerely,



Blake L. Henning
Chief Conservation Officer

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