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land, waters and hunting & fishing
heritage for future generations.

Feb 7, 2020

United States Forest Service
Bitterroot National Forest
1801 North 1st Street
Hamilton, MT 59840

Attn: Forest Plan Amendment- Elk Habitat Objectives #57302

Dear Bitterroot National Forest Staff,

The Montana Wildlife Federation (MWF) is our state's oldest and largest state-based wildlife conservation organization. We were formed in 1936 when hunters joined landowners to restore depleted wildlife in Montana, and for 84 years we have worked on key issues affecting wildlife, habitat, and access to public lands.

MWF has been heavily involved in management of elk, habitat, and hunting opportunities since our inception in 1936 and we welcome the opportunity to comment on this matter. Proper management of elk habitat requires the best science and management practices along with opportunity for public involvement. To this end, MWF appreciates the opportunity to comment during the scoping process for an amendment to elk habitat objectives on the Bitterroot National Forest (BNF).

The proposal to amend and update elk habitat objectives to reflect current research and management tools is understandable and necessary for adequate management of this species. Measuring elk habitat effectiveness and efficacy using older methods can be tedious, convoluted, and redundant and, as such, it is necessary to update these standards as new methods and science become available. MWF is strongly supportive of the Bitterroot National Forest's focus on collaboration with the Department of Fish, Wildlife, and Parks (FWP) on this matter.

In order to be fully supportive of these measures however, MWF needs more detail on how elk habitat standards will be changed and what potential impacts those changes will have on elk habitat security, distribution of elk on the landscape, and how it will affect existing recreation values as it relates to the travel plan. Elk management in Montana and the Bitterroot National Forest in particular, has implications that reach far beyond the animals themselves. Both Montana's economy and landscape rely on proper management of this species, and without science-based management standards, there could be negative impacts to other species.

Specific elk habitat requirements such as thermal cover and hiding cover provide habitat to other species that serve as forest health indicators. Species such as northern goshawk, pileated woodpecker, and American marten rely on areas associated with quality elk habitat, and MWF would like to know how these species will still be prioritized. Impacts on elk along with impacts on other species need to be addressed in order for this proposal to be successful.

MWF understands the need to revise elk habitat standards to reflect new science and we applaud the BNF's commitment to working with FWP. However, we cannot support this programmatic amendment without first understanding the projected impacts to elk habitat security, other wildlife species, and existing recreation values.

Thank you for the opportunity to comment and we look forward to working with the Bitterroot National Forest as this amendment is developed.

Sincerely,



Dave Chadwick, Executive Director
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