

Scoping Comments for the Proposed Amendment to the Forest Plan's Elk Habitat Effectiveness Objectives

The Bitterroot National Forest appears to have decided that the Elk Habitat Effectiveness (EHE) Objectives need to be amended in order to allow more road building and to increase the degradation of elk habitat beyond that which is permissible under the current Bitterroot Forest Plan (1987).

That Forest Plan is the paramount document which directs management activities on the Bitterroot National Forest (BNF). Forest Plans, required and authorized by the National Forest Management Act (NFMA), are legally binding property-management agreements between the Forest Service and the public. Each Forest Plan is required to define management goals, objectives, and standards. Project level activities are expected to be planned and implemented to accomplish the management constraints described in the Forest Plan and are required by law to use National Environmental Policy Act (NEPA) analysis, disclosure and public involvement processes.

Much of the BNF management areas are not in compliance with the EHE standards described in the current Forest Plan. So most of the BNF's recent projects have required "exceptions" (Over the last 12 years, BNF has implemented EHE site-specific amendments covering more than 225,000 acres). Those exceptions allowed increased road density, decreased thermal cover, and various other degradations to BNF ecosystems. Darby Lumber Land II and Gold Butterfly are but two of the many recent examples of proposed timber sales (restoration actions) which rely on project specific EHE amendments.

The proposal to amend the current Forest Plan's EHE Objectives brings several things to mind. Among them:

- Since detailed changes to forest-wide EHE standards are not included in the scoping letter, it is difficult to provide issue-specific comments.
- "Because much of the BNF does not meet Forest Plan EHE standards" is not a valid reason to relax those standards. Claims to the contrary are not based on extensive research and illogical.
- Relaxation of the current standards will make it easier to increase road density in areas which the BNF wishes to log/thin/restore. Given the several thousand miles of roads that now exist on the forest, most of which are under-maintained, adding additional roads seems nonsensical.
- The mere fact that Montana Fish Wildlife and Parks (FWP) reports increasing numbers of elk living in the forest does not equate to "current levels of protection are sufficient." Many more factors are involved.
- Previously, BNF Wildlife Biologist Dave Lockman commented that EHE is used to protect habitat of many other species (Elk habitat acts as a surrogate). One example is, "The EHE standard results in areas of secure habitat for a range of species including grizzly bears" (Gold Butterfly documentation). An abundance of recent research has shown that the existence of roads is detrimental to many wildlife species. If the proposed

amendment intends to allow any increase in road density, then the effect of increased forest road miles on all wildlife should be carefully analyzed for harmful effects before any amendment is recommended.

- The fact that “elk” is the subject of the proposed amendment seems to indicate that the BNF (and FWP) are continuing to consider the desires of hunters at the expense of other wildlife and ecosystems.
- The use site-specific amendments for every logging/thinning/restoration project has required research and paperwork (considered onerous by some). A well-informed observer from outside the Agency would likely assume that the motive for amending the EHE standards is primarily to reduce research and the associated administrative requirements. It appears that amending the EHE Objective portion of the 1987 Forest Plan will remove such requirements, thereby making it more difficult for everyone wishing to express contrary views.

As things stand, the desire to amend the EHE standards seems to demonstrate that Agency management actions are primarily focused on “finding ways to satisfy human desires, even to the detriment of all else.” Such rationale is not only human-centric, but will ultimately lead to the destruction of the very resources the Agency has been mandated to protect and preserve.

I recommend that the BNF does not pursue an amendment to the EHE Objectives. It is more sensible to wait and incorporate changes during the upcoming revision of the Forest Plan.

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