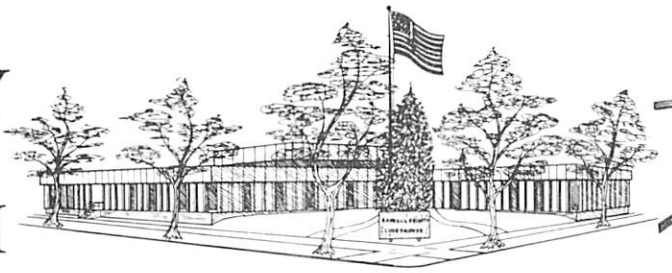
COUNTY OF RAVALLI



STATE OF MONTANA

The Bitterroot Valley

Hamilton, Montana 59840

RAVALLI COUNTY COMMMISSIONERS
215 S. 4th Street, Suite A
Hamilton, MT. 59840
406-375-6500
commissioners@rc.mt.gov

February 6, 2020

Bitterroot National Forest
Attn: Forest Plan Amendment
1801 N 1st Street
Hamilton, MT 59840

RE: Comments on Elk Habitat Objectives

Dear Reviewing Officer,

The Board of Ravalli County Commissioners (BCC) thanks the Forest Service for the collaborative efforts in developing the Elk Habitat Objectives. We look forward to working with you to develop these objectives.

The BCC supports the Forest Service efforts to amend the Elk Habitat Effectiveness (EHE) in the 1987 Forest Plan. The 1987 Forest Plan utilized two major metrics for EHE:

1) Cover/Forage
2) Roads/Road Density

Cover/Forage

It has been erroneously assumed that dense canopy structure provide beneficial elk habitat. Best available science shows that forage is the critical factor for elk numbers and productivity. We believe that the science and studies clearly indicate that the short term impacts from active forest management, including thinning, prescribed burns and commercial harvest are much more beneficial than allowing forests to become overgrown, infested with disease or insects and/or catastrophically burned.

The inverse relation between overstory canopy density and forage abundance (McConnell and Smith 1970, Klinka et al. 1996) indicates an important tradeoff between providing dense forest cover and providing forage resources that affect carrying capacity (e. g., Hett et al. 1978). Although research has certainly demonstrated the importance of energy balance to animal performance, the last 30 years of research has paid little attention to developing coarse-scale, management-level habitat models and planning procedures that address nutritional issues, and it has paid little attention to the effects of specific silvicultural systems that may influence the nutritional value of large landscapes to large herbivores. (Cook, Irwin, Bryant, Riggs, Thomas, 2004, Thermal cover needs of large ungulates)

A study published in the Journal of Wildlife Management by University of Wyoming researcher Bryan Lamont found elk tended to avoid beetle-killed areas overall, resulting in much less forest habitat. He stated "When millions of hectares of forest have been impacted by the bark beetle epidemic, this leads to a loss of habitat".

Research shows that fire can be beneficial for promoting the growth forage for elk habitat. However, catastrophic wildfires that result in sterile or weed infested landscapes are avoided by elk. Elk will also avoid burned areas that have a significant amount downed trees because movement is difficult forcing them to expend more energy.

Roads/Road Density

Road impact on elk habitat have also been exaggerated in the past. Roads and road density has been historically used and the driving factor for effective elk habitat. Again, studies show that forage is the critical factor for elk habitat. There is no question that motorized use disturb elk, but motorized use has been characterized as significantly more detrimental than other recreation.

While not specific to elk one study one study found that non-motorized activities had more evidence for negative effects than motorized activities. "Motorized activities are often expected to be more harmful to animals because of vehicle speed and noise [43], but our results suggest the opposite across a wide range of study locations and taxa". (Larson, C.L., Reed, S.E., Merenlender, A.M., Crooks, K.R., 2016. Effects of recreation on animals revealed as widespread through a global systematic review.)

Elk sensitivity to roads can be observed by driving the major travel corridors in the valley, both Eastside Hi-way and Hi-way 93. It is rare that you can drive these highly traveled roads and not see elk near the road. Elk frequently cross these busy roads and end up casualties to high speed collisions with vehicles. This observation reasonably leads us to believe there are influences on elk and elk habitat much greater than that of roads.

Local Impacts

Our community is impacted in a number of different ways from elk herds moving from traditional higher elevations to year around valley bottom herd. Because much of the lower elevations where forage is of higher quantity and quality is private, elk harvest rates are lower and will result in larger elk populations in the lower elevations. Elk mortality and population will also increase in the lower elevations due to the increased quantity and quality of the forage, less predator pressure and milder climate conditions than that of the higher elevations. More elk on private lands will increase impacts on agricultural operations and conflicts between elk and humans including collisions on the hi-ways. It would be reasonable to expect that increased elk numbers in the lower elevations would result in increased large predators at these lower elevations. Hunting conflicts will also increase as elk move away from public lands to private.

Conclusion

Large Elk herds have not, up until relatively recently made the valley floor their year around home. Forage quantity and quality in the lower levels of the valley are better than higher elevation national forest lands and has been so for many decades. Elk have relatively recently moved from higher more remote forest lands to more densely populated and traveled areas and it is not coincidence this change happened around the wolf reintroduction.

The entirety of the Bitterroot National Forest is not suitable elk habitat and therefore should not be managed as such. Bitterroot National Forest decision makers should be allowed to work with state and local agencies to determine if elk habitat objectives should be incorporated into a forest project. Outdated policies and science on the impacts of roads and forest management projects on elk and elk habitat should be abandoned and allow forest decision makers to adopt active management practices that promote healthy forests and provide beneficial elk habitat.

Sincerely,

Ravalli County Board of Commissioners

Absent

Chris Hoffman, Chairman

Greg Chilcott, Vice-Chair

Jeff Burrows, Member