

# *Ravalli County Off Road User Association*

*P.O. Box 72, Hamilton, Montana 59840*

*www.ravallioffroad.org*



February 10, 2020

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

To Whom It May Concern:

This letter constitutes comments on the BNF proposed amendment to the 1987 Forest Plan concerning standards for elk habitat in the Forest. These comments are submitted on behalf of the Ravalli County Off Road User Association (RCORUA). RCORUA is a group of about 200 Ravalli County citizens who advocate for responsible public access to public lands. We request that RCORUA be included as an interested party in this proposed action and that these comments be included in the Administrative Record for this project.

In general, RCORUA supports the Plan Amendment as described in the Scoping letter of December 18, 2019. The rationale for this Plan Amendment is obvious: The Elk standards articulated in the 1987 Forest Plan don't seem to have any relationship to the health of elk in the Bitterroot National Forest. In spite of the fact that virtually every BNF NEPA project since 1987 hasn't meet those standards, elk populations in Ravalli County meet or exceed population targets set by Montana FWP.

## **EHE Is a Meaningless Metric**

The 1987 Forest Plan uses a single metric to measure the effectiveness of elk habitat. That metric is called Elk Habitat Effectiveness (EHE). The only parameter used to calculate EHE is open road densities (a road is considered to be "open" if it can be traveled at any time during the year). The exclusive reliance on road densities as a measure of the effectiveness of elk habitat in the 1987 Forest Plan implies that road densities are considered to be the dominant, controlling influence on elk health and abundance. That's nonsense. It is well-established that the dominant controlling influence on elk health and abundance is the availability of food. Well-fed elk are resistant to disease and have high successful birth rates. Poorly-fed elk die of starvation, are susceptible to disease, and have poor successful reproductive rates. Yet the availability of food for elk is nowhere included as a standard in the 1987 Forest Plan.

A secondary influence on elk abundance is predation. In this context, we include human predators along with wolves, bears, and mountain lions. When the populations of predators are high, predation can influence the abundance of elk not only by killing them, but also by stressing

the animals. Montana FWP is charged with maintaining a suitable balance between elk abundance and human and animal predation. They do this primarily through hunting and trapping regulations following the North American model for wildlife management.

There is a significant body of research concerning the possible influence of roads on wildlife. Typically, this research observes the responses of wildlife to an introduced disturbance such as motorized traffic. In many cases, this research concludes that elk and presumably other wildlife flee energetically from these introduced disturbances. That's not a surprising outcome. Elk will flee from anything they are not familiar with. However, elk and other wildlife eventually become habituated to disturbances, especially those disturbances they learn to be non-threatening. This is an area of behavior that unfortunately researchers have not adequately studied even though there is abundant anecdotal and published evidence that it routinely occurs. It is difficult to justify the claim that elk have an unresolvable fear of traffic when one observes large herds of elk placidly bedded down within a stone throw of highway US 93. And most east and west side residents will testify to the lack of elk flight response to their daily activities. Most Forest visitors have experienced the need to exit their vehicles a "shoo" mule deer and big horn sheep off Forest roads in order to proceed. Published research regarding the response of wildlife to vehicle travel in Yellowstone should not be ignored, because it applies to general Forest areas as well.

### **Sanctuary Areas**

There has been a great deal of discussion by Montana FWP and the Forest Service wildlife managers about the perceived need to establish additional wildlife sanctuary areas on public land. For the purposes of this discussion, a "sanctuary area" is defined to be an area of public land that does not contain motorized roads. RCORUA finds these arguments to be troubling, inconsistent, and in some cases irrational.

First of all, the influence of roads on wildlife ignores the abilities of wildlife to become habituated to traffic as discussed above. This is a significant omission in the prevailing dogma.

Secondly, the influence of motorized trails on wildlife is not established. Typically, wildlife managers assume that there is no difference between a road and a trail disturbance. This is not a substantiated assumption, especially in view of the fact that there are far fewer trail vehicles than full-sized vehicles on public land. In other words, the frequency of occurrence is far less for trail vehicles than full-sized vehicles, and the current dogma does not account for that fact.

Thirdly, it is not rational to complain that sanctuary areas are established on private land and at the same time claim a need for additional sanctuary areas on public land. Sanctuary areas serve their purpose, regardless of whether they occur on private or public land.

Finally, nearly three-fourths of the Bitterroot National Forest is already designated as a huge sanctuary area (Designated Wilderness or Inventoried Roadless Area). With this in mind, it is difficult to justify the need for additional sanctuary areas for wildlife in this particular Forest.

### **Wildlife and Private Land**

Claims have been made that the use of motorized vehicles on roads and trails on public land “drives” wildlife onto private land, particularly onto large landholdings such as the CB Ranch. RCORUA asserts that such claims are astonishingly without merit. Such claims seem to ignore these facts:

- Privately held lands offer a far superior food source for ungulates, especially during the fall and winter seasons;
- Privately held lands are substantially free from predators;
- Privately held lands are heavily roaded, and those roads are routinely traveled yearlong for both management and recreational purposes.

### **Bow Hunting Season**

As a result of the 2016 BNF Travel Plan, many roads and trails were closed to motorized travel on September 1 rather than the usual “hunting season” closure of October 15. The rationale for these closures was that the flood of bow hunters was driving deer and elk onto private lands. This is a flawed assumption as discussed above.

According to the FWP Hunter Survey results, there were only 1,236 bow hunters in Ravalli County during the 2015 hunting season. It stretches the credibility of the claim that so few bow hunters could be responsible for rearranging the distribution of elk in the entire Forest.

Paradoxically, these early closures penalize bow hunters by crowding them into increasingly smaller and smaller areas and reduces the quality of their experience as well as confounding the intent of FWP hunting regulation.

RCORUA is opposed to these early season closures and asserts that the logic for doing so is not credible or supported by adequate scientific research.

### **Recommendations**

RCORUA supports the proposal to increase wildlife management areas to areas containing 3,000 or more acres. This would greatly relieve the Forest’s administrative burden, be more consistent with national guidelines, and produce more meaningful standards for elk habitat effectiveness.

RCORUA enthusiastically endorses the creation of more relevant metrics to measure elk habitat effectiveness. These metrics must include food availability as the primary and dominant control of elk health and abundance. Secondary influences such as percent canopy cover may be included in the development of a meaningful metric. Possible third order factors, in particular road densities, should not be included in the development of any metric for the effectiveness of elk habitat because there is little correlation between elk health and road densities.

RCORUA does not support any metrics for elk habitat effectiveness that includes additional road or trail closures, early seasonal “bow hunting” restrictions, the creation of additional sanctuary areas or private land issues. RCORUA asserts that these factors have little or no influence on

elk health and abundance, ignore the abilities of elk to habituate to non-threatening disturbance, have not properly accounted for factual information, or are otherwise part of a flawed and irrational dogma.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Dan Thompson". The signature is written in black ink and is positioned above the printed name and phone number.

Dan Thompson  
(406) 531-3103