ROCKY MOUNTAIN ELK FOUNDATION

April 20, 2020

Nez Perce Clearwater National Forests
Attn: Zach Peterson, Forest Planner
903 3rd St.
Kamiah, ID 83536

Re: Nez Perce Clearwater National Forest Plan Revision

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the Nez Perce Clearwater National Forest Draft Plan Revision (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 7.9 million acres of North America's most vital habitat for elk and other wildlife, including over 550,000 acres in Idaho. In addition, RMEF has invested significantly in research and collaborative efforts to improve elk populations and wildlife habitat in the Clearwater Basin area, the Nez Perce Clearwater National Forests, and across Idaho.

RMEF recognizes that the Forest Plan Revision Process under the 2012 planning rule is designed to emphasize restoration of natural resources to make our National Forests more resilient to climate change, protect water resources, and improve forest health. We request that the following general recommendations be incorporated into the Forest Plan and in subsequent project design and implementation:

Inclusion of elk and elk habitat in planning efforts

- Healthy, free-roaming elk herds contribute to and are intermingled with the social well-being, ecological integrity, and cultural and economic goals of the Forest. RMEF appreciates that elk and elk habitat are considered a focus for management planning efforts. Elk and other big game serve 'distinct roles and contributions' to multiple user types on the Forest (viewing, hunting, etc.) and the Forest Plan plays an important role in supporting future big game populations.

Coordination with state wildlife agencies

- RMEF works closely with each state's wildlife agency. These agencies are our vital partners. In setting new management directions for elk habitat in forest plans and project design, we support and encourage continued forest planning efforts be coordinated with state wildlife agencies and that state agency goals for elk are integrated into the plan.

Actively managed landscapes

- 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, Wisdom et al. 2018), and elk security (Ranglack et al. 2017, Wisdom et al. 2018) continue to build on this foundation. RMEF recommends that recent research on the benefits of actively managed landscapes and relevant components of Executive Order 13855 on active management on America's forests (2018) be incorporated into the Plan.
- 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 which provide critical forage and cover for elk and other species (Swanson et al. 2011). Prescribed burns not only improve elk habitat, but can help reduce the threat of catastrophic wildfire in the future. RMEF supports this work that complements Forest Service management goals across multiple programs.
- RMEF supports balanced use of timber production and encourages consideration of wildlife habitat enhancement through timber production activities. Opportunities for timber production which can provide greater flexibility in using the full array of active vegetation management activities are more effective at meeting desired vegetative conditions.
- RMEF is very supportive of active management on our public lands to benefit wildlife habitat and fire risk management. Wilderness designation presents a concern, as these acres are not eligible for various active management activities. Given these limitations and the current state of many of our forests, RMEF supports management directions that limit additional Wilderness acreages.
- Noxious and invasive plants are slowly replacing native forage for elk and other species. RMEF encourages the Forest Service to actively manage landscapes to control and reduce noxious weeds through an integrated weed management approach (biological, mechanical, chemical, and outreach). Early detection and rapid response remains a critical component of effective weed management (Westbrooks 2004). Native plant communities provide the highest nutritional value, thus RMEF encourages the use of native plant seed mixes in all restoration work.
- Managed livestock grazing can improve the health of rangelands and forest meadows if the system is designed with habitat values for elk and other wildlife in mind. An effective range management program between the agency and permittees is essential to maintaining the economic base and lifestyle that have helped keep private lands across elk country as working ranches. RMEF encourages the Forest Service to employ grazing management systems and techniques compatible with maintaining desired levels of elk and other wildlife.

Resource management and land protection across land ownership

- Public lands are where the majority of the public hunts and otherwise enjoys elk. In some places a growing portion of elk are using private land. RMEF recommends inclusion of Goals that emphasize coordination between the National Forest, State Wildlife Agencies, private landowners, and others to provide habitat conditions that support year-round presence of elk and other big game on the Forest.
- Each year, our National Forests become more critical to elk and other wildlife due to habitat loss on private land. When privately owned wildlife habitat within or immediately adjacent to the National Forest becomes available for purchase, we urge the National Forest to work with RMEF and other national and local conservation groups to acquire parcels, enter into land exchanges, or obtain conservation easements to secure more elk habitat for the future.
- Wildlife connectivity is increasingly threatened by habitat loss and degradation as well as development activities. RMEF recommends Plan components that recognize the importance of big game migration corridors and include management direction for protecting corridors across National Forest and neighboring lands.

Management of motorized and non-motorized recreation

- 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 (Wisdom et al. 2005) and non-motorized traffic on elk (Wisdom et al. 2018). RMEF supports a balanced approach regarding the Recreation Opportunity Spectrum. Multi-use activities occur year-round, and RMEF recommends that the Forest provide access for those seeking varied experiences (primitive and roaded). However, RMEF also recommends inclusion of Desired Conditions, Goals, and/or Guidelines that provide seasonal protection (during critical times) for elk and other wildlife from impacts of recreation (via roads, trails, and associated motorized and non-motorized traffic).

Public access and hunting heritage

- For many hunter-conservationists, public lands provide the best opportunity to pursue their hunting heritage. These activities deliver economic benefits for local communities, as well as cultural and social benefits. RMEF appreciates inclusion of hunting, fishing, trapping, and shooting sports as contributing to local economies and the well-being and quality of life of National Forest users. The Forest Plan should provide for the continuation of these activities as a valid and vital component of the recreation spectrum. The Federal Lands Hunting, Fishing & Shooting Sports Roundtable MOU between the U.S. Department of Agriculture, the U.S. Department of the Army, and the U.S. Department of the Interior (2011) develops and expands a framework of cooperation among the parties at all levels for planning and implementing mutually beneficial projects and activities related to hunting, fishing, trapping, and shooting sports conducted on federal land.
- Identified as the largest barrier to maintaining hunting and angling participation, access to public land plays a critical role in ensuring the future of our hunting heritage. RMEF recommends consideration of public land access needs in forest planning efforts, including

close collaboration with state wildlife agencies to create or maintain access points to the National Forest that are important for managing wildlife. In addition, RMEF recommends inclusion of relevant components within Executive Order 13443 on facilitation of hunting heritage and wildlife conservation (2007) and the John D. Dingell, Jr. Conservation, Management, & Recreation Act (2019).

In addition to the above key concepts, RMEF submits comments specific to the proposed actions in the Draft Plan and EIS:

1.1.2.4.1 Wildlife Species

- RMEF appreciates recognition of elk as an important species and their economic and cultural value. RMEF agrees that the Nez Perce Clearwater National Forest is essential for providing quality elk habitat.

2.1.3 Forestlands

- FW-OJB-FOR-01: RMEF supports maximized efforts to restore aspen, as recognized in Alternative X.
- MA3-OBJ-FOR-01 and -02: RMEF supports use of timber harvest to meet objectives and maximize restoration, as described in Alternatives W and X.
- MA3-OBJ-FOR-03: RMEF recommends maximizing restoration activities in the Cool Moist Potential Vegetation Type Group, as described in Alternatives W and X.
- MA3-OBJ-FOR-04: RMEF recommends maximizing restoration activities in the Cold Potential Vegetation Type Group, as described in Alternatives W and Y.
- MA2-OBJ-FOR-01: RMEF supports Alternatives Y and Z to increase the use of timber harvest and prescribed fire across all Potential Vegetation Types.

2.1.5 Meadows, Grasslands, and Shrublands

- FW-OBJ-GS-01: RMEF appreciates recognition of continued habitat degradation due to conifer encroachment. Given the impacts to grasslands, shrublands, and aspen stands, RMEF recommends increasing the number of treated conifer encroachment acres above the proposed objective of 2,500 acres every five years.

2.1.6 Fire Management

- FW-OBJ-FIRE-01: RMEF supports the use of wildland fire and other vegetation treatments to improve or maintain desired forest vegetation conditions on 375,000 acres per decade.
- FW-OBJ-FIRE-02: RMEF supports maximizing opportunities for hazardous fuels mitigation. While all Alternatives are very similar, the greatest acre minimums are reflected in Alternatives W and Y.
- FW-OBJ-FIRE-03: RMEF supports maximizing opportunities to reduce the risk of uncharacteristic and undesirable wildland fires by managing natural, unplanned ignitions to meet resource objectives. While all Alternatives are very similar, the greatest acre minimums are reflected in Alternatives X and Z.

2.1.7 Invasive Species

- RMEF supports the coordinated effort for invasive species management through the use of Cooperative Weed Management Areas with efforts focused on an Early Detection Rapid Response approach.
- The Draft Plan and Environmental Impact Statement (EIS) define Invasive Species, Noxious Weeds, and Invasive Weeds within the text and also the Glossary according to different governing laws. However, both the Draft Plan and EIS use multiple terms intermittently and inconsistently, which creates the potential for confusion during plan implementation and opens doors for unnecessary litigation. RMEF strongly recommends thorough review of the use of all terms associated with invasives, weeds, noxious, exotic, non-native, etc. to ensure the analysis is consistent (and accurate) with each term use and to create more concrete implementation direction.

2.3.1 Multiple Uses Wildlife

- FW-GL-WLMU-01: RMEF supports the Goal that habitat contributes to wildlife populations at levels meeting Idaho Department of Fish & Game species management plan objectives.
- FW-DC-WLMU-01: RMEF appreciates recognition of the importance of hunting, fishing, trapping, viewing, etc. in the Desired Conditions.

2.3.2 Multiple Uses Wildlife – Elk

- RMEF appreciates the specific attention to elk and elk habitat throughout the Plan and this section. RMEF applauds the efforts to incorporate the best available (especially summer nutrition) science in the Draft Plan.
- MA1-DC-ELK-01 and MA2-DC-ELK-01: RMEF appreciates the balance in providing detailed Desired Conditions to improve elk summer nutritional resources, while recognizing that Desired Conditions for vegetation must also be met as described in the Forestlands section.
- MA2-DC-ELK-02 and MA2-GDL-ELK-01: The Draft Plan recommends that areas at least 5,000 acres in size exist without motorized access open to the public in order to maintain habitat use by elk. RMEF supports the work by Rowland et al. (2018) who reinforced the importance of elk summer nutrition and attention to potential interactions with open road density. However, it is assumed that the U.S. Forest Service (USFS) recommendation for a minimum of 5,000 acres of non-motorized access is following the study by Ranglack et al. (2017). This study provides unique insight into the complexity of elk habitat use, specifically pertaining to hunter use of the landscape, especially in areas where elk are displaced onto private land. However, Ranglack et al. (2017) cautioned that extrapolation of their results beyond the study area may or may not be appropriate, as results generated in one area may perform extremely poorly when applied in areas that are geographically distant or ecologically dissimilar. The Draft EIS recognizes that conditions on the Nez Perce Clearwater are substantially different than those in western Montana, where the Ranglack et al. (2017) study took place. The Nez Perce Clearwater contains large stretches of wilderness that provide an abundance of elk security areas. In addition, hunting pressure and elk use of private lands differs widely compared to the study area. Given the complexity of the interaction between elk use of high quality forage areas and open road density, RMEF recommends consideration of alternative strategies and the use of more than one study to set Desired Conditions and Guidelines. RMEF encourages reassessment of studies

recommending 'distance to open roads' and interactions with topography, etc. to set Plan direction. Reconsideration of this specific Plan direction will help alleviate concerns expressed in the Draft EIS about potential challenges and limited opportunities for conducting timber harvest, fire management, or other treatments due to the proposed 5,000-acre restriction on open road access. Additional concerns arise regarding potential restrictions for active management opportunities to occur in roadless areas where elk may benefit the most from creation of early seral conditions. RMEF encourages the USFS to consider the long-term sustainability of such Desired Conditions and Guidelines, and the potential to limit active management that would largely benefit elk and other wildlife in the future. Finally, RMEF recommends that recreational access and open road density considerations be coordinated closely with the Nez Perce Clearwater Travel Management Plans.

4.2 Sustainable Recreation Management

- RMEF supports a balanced approach regarding the Recreation Opportunity Spectrum. Multi-use activities occur year-round, and RMEF recommends that the Forest provide access for those seeking varied experiences (primitive and roaded). However, RMEF also recommends inclusion of Desired Conditions, Goals, and/or Guidelines that provide seasonal protection (during critical times) for elk and other wildlife from impacts of recreation (via roads, trails, and associated motorized and non-motorized traffic) and/or administrative activities. Timing restrictions should be based on the best available science as well as site-specific factors (topography, available habitat, etc.)

4.7 Land Ownership and Land Uses

- FW-GDL-LND-02: RMEF supports Guidelines recognizing that acquisition or conveyance land ownership adjustments should improve management of National Forest System lands by consolidating land ownership, providing public access to public lands, and protecting and enhancing resources.
- RMEF recommends inclusion of Guidelines/Desired Conditions that seek opportunities to maintain or increase public land connectivity across the Forest through land acquisitions, land transfers, etc. and prioritize such actions based on increasing public access, habitat connectivity, wildlife corridors, enhancement of recreational opportunities, etc.
- RMEF recommends inclusion of Guidelines/Desired Conditions to seek opportunities to improve road and trail rights-of-way for access to hunting, fishing, and other recreational opportunities.

5.1 Timber

- FW-OBJ-TBR-01: RMEF supports Alternative X for timber objectives to meet overall multiple-use objectives and achieve the Plan's desired conditions and objectives. This would allow increased timber harvest beyond yield limit, for a specified period of time.
- FW-OBJ-TBR-02: Similarly, RMEF supports Alternatives (W and X) that allow for increased Projected Wood Sale Quantity; however, the Alternatives in Appendix I do not line up with those described in the Draft Plan (the latter, which RMEF is basing comment on).
- RMEF supports maximizing opportunity for Restoration Acres through Timber Harvest, as in Alternatives W and X (no objective reference).

5.3 Livestock Grazing

- RMEF recommends adding Desired Conditions to provide forage and residual cover for wildlife (especially following management activities or natural disturbances), and to adjust stocking rates in drought conditions when vegetation is slow to recover.

RMEF appreciates the opportunity to engage in the Forest Planning efforts of the Nez Perce Clearwater National Forest. We look forward to reviewing the Final Plan and EIS, when available.

Sincerely,

Blake L. Henning
Chief Conservation Officer

References

Cook, R.C., J.G. Cook, D.J. Vales, B.K. Johnson, S.M. McCorquodale, L.A. Shipley, R.A. Riggs, L.L. Irwin, S.L. Murphie, B.L. Murphie, K.A. Schoenecker, F. Geyer, P.B. Hall, R.D. Spencer, D.A. Immell, D.H. Jackson, B.L. Tiller, P.J. Miller, and L. Schmitz. 2013. Regional and Seasonal Patterns of Nutritional Condition and Reproduction in Elk. Wildlife Monographs 184:1-45.

Exec. Order No. 13855, 84 FR 45. 2018. Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands to Improve Conditions and Reduce Wildfire Risk. Pages 45-48.

John D. Dingell, Jr. Conservation, Management, and Recreation Act. Pub. L. 116-9. (2019).

Middleton, A.D., M.J. Kauffman, D.E. McWhirter, J.G. Cook, R.C. Cook, A.A. Nelson, M.D. Jimenez, R.W. Klaver. 2013. Rejoinder: challenge and opportunity in the study of ungulate migration amid environmental change. Ecology 94: 1280-1286.

Quigley, T.M., and M.J. Wisdom. 2015. The Starkey Project: Long-term research for long-term management solutions. Pages 9-16 *in* Wisdom, M.J., technical editor, The Starkey Project: a synthesis of long-term studies of elk and mule deer. Reprinted from the 2004 Transactions of the North American Wildlife and Natural Resources Conference, Alliance Communications Group, Lawrence, Kansas, USA.

Ranglack, D.H., K.M. Proffitt, J.E. Canfield, J.A. Gude, J. Rotella, and R. Garrott. 2017. Security areas for elk during archery and rifle hunting seasons. Journal of Wildlife Management 81:778-791.

Rowland, M.M., M.J. Wisdom, R.M. Nielson, J.G. Cook, R.C. Cook, B.K. Johnson, P. Coe, J.M. Hafer, B.J. Naylor, D.J. Vales, R.G. Anthony, E.K. Cole, C.D. Danilson, R.W. Davis, F. Geyer, S. Harris, L.L. Irwin, R. McCoy, M.D. Pope, M. Vavra. 2018. Modeling Elk Nutrition and Habitat Use in Western Oregon and Washington. Wildlife Monographs. 199. 1-69.

Sawyer, H., M.J. Kauffman, A.D. Middleton, T.A. Morrison, R.M. Nielson and T.B. Wyckoff. 2013. A framework for understanding semi-permeable barrier effects on migratory ungulates. Journal of Applied Ecology 50:68-78.

Swanson, M.E., J.F. Franklin, R.L. Beschta, C.M. Crisafulli, D.A. DellaSala, R.L. Hutto, D.B. Lindenmayer, F.J. Swanson. 2011. The forgotten stage of forest succession: early-successional ecosystems on forest sites. Frontiers in Ecology and the Environment 9:117-125

Westbrooks, R.G. 2004. New approaches for early detection and rapid response to invasive plants in the United States. Weed Technology 32:1468-1471.

Wisdom, M. J., A. A. Ager, H. K. Preisler, N. J. Cimon, and B. K. Johnson. 2005. Effects of Off-Road Recreation on Mule Deer and Elk. Pages 67-80 in Wisdom, M. J., technical editor, The Starkey Project: a synthesis of long-term studies of elk and mule deer. Reprinted from the 2004 Transactions of the North American Wildlife and Natural Resources Conference, Alliance Communications Group, Lawrence, Kansas, USA.

Wisdom, M.J., H.K. Preisler, L. Naylor, R.G. Anthony, B.K. Johnson, M.M. Rowland. 2018. Elk responses to trail-based recreation on public forests. Forest Ecology and Management 411:223-233.