



Montana Fish, Wildlife and Parks - Region 2
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Missoula, MT 59804
(406) 542-5500
09/15/2023

Matt Anderson
Forest Supervisor
1801 N 1st St, Hamilton, MT 59840

Subject: Bitterroot Fuel Breaks Projects - Sleeping Child, Rye Creek, Sula, and Soda-Baker

Dear Mr. Anderson,

Thank you for the opportunity for Montana Fish, Wildlife & Parks (FWP) to comment on the scoping for Bitterroot National Forest Fuel Breaks including the Sleeping Child, Rye Creek, Sula, and Soda-Baker projects. We recognize the importance of fuels management in this area to reduce the risk of wildfire to neighboring communities. FWP is interested in commenting on these projects because clearing up to 1,000 feet of cover on the Forest roads specified in these projects could have direct impacts on wildlife populations.

FWP suggests the following changes and/or mitigations that will help offset potential impacts to wildlife, while meeting our shared goal of reducing the risk of fire in the Wildland Urban Interface in the Bitterroot Valley:

Wildlife Comments

A primary concern with the proposed fuel breaks in the Bitterroot National Forest is the loss of hiding cover for big game along heavily used roads. The Sleeping Child, Rye Creek, and Sula fuel breaks are located in Hunting District 270 (HD270), which is Montana's most highly coveted mule deer Special Management Area with the lowest draw odds of any buck permit, and for which elk hunting pressure is among the highest in the state (22,919 hunter-days in 2022, the fourth highest in the state and the highest in FWP Administrative Region 2). Black bear hunting is also popular here, and grizzly bears sightings are increasing.

All three projects are proposed along loop roads that are heavily used by hunters in all seasons, and some of the only unburned patches of forest remaining across the broader landscape exist immediately adjacent to these roads or within the 1000-foot buffer proposed for treatment. We are concerned that removing all hiding cover along these roads, whether that be unburned forest or regrowth from the 2000 fires, may significantly increase harvest mortality of elk and mule deer, and may increase poaching.

Additionally, the area in the southwest corner of the Sula fuel break (NF73537) is an important migratory corridor for elk (and mule deer, to a lesser extent) moving into HD270 from the Big Hole, an event which often occurs during the general rifle season (dependent on weather conditions). An approximately 150-ft wide fuel break was already made along this road in response to the 2022 Trail Ridge fire. Expanding this to 1000 feet will create a significant shooting lane that may impede animals attempting to cross. As the Trail Ridge fire and 2021 Trail Creek fire already created significant fuel breaks to the east and southeast, we wonder if this is an area where the proposed treatments may not be needed.

We recognize the need for fuels management to prevent wildfires from threatening the numerous homes along the Sleeping Child and Rye Creek drainages; however, we would recommend a lighter approach, with some patches of hiding cover left intact where feasible, especially where such patches may be scarce across the broader landscape such as: the Fox/Cathouse Creeks area in the Rye fuel break, the southern end of the Sleeping Child fuel break, and Maynard Creek in the Sula fuel break. In addition, we recommend the Sleeping Child and Sula fuel breaks be reduced in scope. Sleeping Child fuel break is immediately adjacent to the Rye Creek fuel break and raises some concern for the cumulative impacts. The densely forested areas between Skalkaho and Sleeping Child drainages, and in the Gibbons Pass area, present a lower risk to the surrounding communities, and we would recommend a more conservative approach in this area.

Additionally, project maps show fuel breaks that do not appear to follow roads (some portions of the Sula project south of Andrews Creek and near Dickson Creek, in the Soda-Baker project area between Baker Creek and Christisen Creek, as well as the Soda Springs, Pine Creek and Nelson areas in the W Fork) or may follow closed roads or other features. The scoping letter indicates that fuel breaks can be constructed on “linear features, such as a road, trail, powerline, or similar feature” and that “short temporary roads may be constructed to access and remove trees.” We are concerned that these fuel breaks and associated temporary roads could offer avenues for illegal off-road use, and we ask that the Forest Service pay particular attention to maintaining effective closures in these areas as well as making sure motorized use stays on open roads and does not expand illegally into these fuel breaks.

Fisheries Comments

To the protect stream and fisheries resources, the projects should comply with the USFS Inland Native Strategy as well the Montana Streamside Management Zone Law and Rules.

We hope that this project will strike a suitable compromise between the needs of wildlife and the risk of wildfire to communities in the Bitterroot. FWP staff will be available throughout the process to offer additional insights or guidance should the need arise.

We encourage you to reach out to Rebecca Mowry as the primary contact person with any questions or concerns about these comments at RMowry@mt.gov or 406-363-7141. Thank you for the opportunity to comment and we look forward to working with you.

Sincerely,



Randy Arnold
Regional Supervisor, Region 2