



Montana Fish, Wildlife and Parks - Region 2  
3201 Spurgin Road  
Missoula, MT 59804  
(406) 542-5500  
09/13/2023

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

Subject: Bitterroot Front Project EA

Dear Mr. Anderson,

Thank you for the opportunity for Montana Fish, Wildlife & Parks (FWP) to comment on the Bitterroot Front Project located in Ravalli County and a small portion within Missoula County, Montana. FWP is interested in commenting on the draft plan because some of the proposed alternatives could have direct impacts on wildlife populations.

FWP suggests the following changes and/or mitigations to the chosen alternative to help offset potential negative impacts to fish and wildlife.

Wildlife Comments

The treatment area is known habitat for a wide variety of wildlife, including elk, mule deer, mountain goat, the occasional bighorn sheep, wolverine, fisher, and grizzly bear, as well as a host of nongame species. Notably, grizzly bear sightings have been increasing, and two subadult grizzlies occupied the northern project area in late summer 2022.

We recognize the importance of fuels management in this area to reduce the risk of wildfire to neighboring communities. The thinning/prescribed burning proposed by this project should benefit elk and mule deer in this area by improving the quantity and quality of understory forage. Elk in particular have become habituated to the subdivisions and agricultural lands along the Bitterroot Front. Improving habitat quality on the forest—including restoring south-facing meadows affected by conifer encroachment—should help draw those elk away from private lands and conflict.

However, we would like to request that the Bitterroot National Forest take measures to maintain habitat quality for other species, given the importance of the Bitterroot Front as a migratory corridor between the Sapphire Mountains/Bitterroot River bottom and the Bitterroot Mountains. In general, a mosaic approach mimicking natural forest processes, especially across variable aspects (e.g. focusing thinning on drier, south-facing slopes), should reduce the impact of this large-scale project on species dependent on corridors and microhabitats. Leaving large-diameter snags and coarse woody debris, and maintaining smaller-diameter snags where feasible amidst the fuels management goals, benefits most of the birds, rodents, reptiles, and amphibians listed as Species of Concern on page 109 of the EA, as well

as furbearing mammals. We appreciate the Forest's stated goal of no net loss of old-growth forest, and request that the Forest also consider the benefit of management for uneven-aged, variable-density forest stands for wildlife. We also recommend that riparian corridors remain undisturbed.

The improved forage quality of thinning should benefit big game, but the addition of road miles may be of concern. We recommend that any new administrative roads be well obstructed to reduce illegal use, and that temporary and decommissioned roads be re-contoured, if possible. Public roads would also benefit from leaving some hiding cover, especially where the slope provides a wider viewshed. We also cannot stress enough the importance of post-treatment weed control to prevent the colonization of invasive weeds on newly-disturbed habitats—not just on temporary roads, but skid trails, landings, and new openings.

We hope that this project will strike a suitable compromise between the needs of wildlife and the risk of wildfire to communities along the Front. 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](mailto: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