



Montana Fish Wildlife & Parks
Region 3 Headquarters
1400 S 19th Avenue
Bozeman, MT 59718

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Helena-Lewis and Clark National Forest
2880 Skyway Drive
Helena, MT 59601
406-495-5201

RE: Helena Lewis and Clark National Forest, Forest-wide Prescribed Fire Project

Dear Ms. Entwistle and Ms. Platt,

Thank you for the opportunity for Montana Fish, Wildlife & Parks (FWP) to comment on the forest-wide prescribed fire project on the Helena-Lewis and Clark National Forest (HLC).

Given the programmatic nature of the HLC's forest-wide prescribed fire environment assessment (EA), FWP comments will be general in nature. Without specifics regarding locations or treatments, it is difficult to analyze or predict impacts to fish and wildlife resources, as each area and landscape is different. While FWP typically supports the use of prescribed fire, FWP has concerns regarding the EA's proposed action and analysis therein.

Habitat Effectiveness and Elk Security

FWP believes that project goals such as reducing stand densities to open the understory, promoting large trees, and making the overall landscape on the HLC more resilient to fire have the opportunity to benefit species such as elk and mule deer. However, FWP believes that unless the HLC addresses existing elk security and habitat effectiveness issues the benefits of the project may be limited in many cases, particularly for elk. Per the EA, seven out of the 10 Geographic Areas currently have less than 30% elk security. FWP wildlife staff appreciates that the proposal indicates no new permanent roads will be constructed as part of this forest-wide effort.

Also, while FWP recognizes that the elk herd unit is the appropriate level of analysis in many instances, including external landownerships in the analysis for habitat effectiveness and elk security, would be discouraged, given that the HLC's management authority is constrained to its own lands. FWP believes HLC should have provided habitat effectiveness, elk security information, etc. for individual herd units specific only to HLC managed land to provide an assessment of actual HLC conditions. By including other landownerships, particularly private lands that may have few roads, habitat effectiveness and elk security values for individual herd units were likely higher than what is found on HLC managed lands. It would be more informative to focus solely on HLC-managed lands for a comprehensive evaluation.

Because given the values presented for habitat effectiveness and elk security did not include areas that by their inherent nature (too steep, too rocky, lack an adequate understory, etc.) some of the locations

are likely not elk habitat or are at best poor elk habitat. Thus, FWP recommends adding these parameters to the methodology. Without incorporating these values at the Geographic Area scale, the analysis inflates the values for habitat effectiveness and elk security on the HLC. For instance, the USFS/FWP Collaborative Habitat Recommendations cited by the HLC state that “generally high elevation areas that are above tree line or steep ($\geq 80\%$ slope) areas that are not used by elk will generally not be considered elk habitat.”

FWP also has concerns about what constitutes “as soon as possible” regarding HLC’s staff addressing situations of illegal motorized use. FWP staff are aware of many unobstructed (non-gated, etc.) supposedly closed routes (seasonally or yearlong) that appear to be receiving illegal motorized use at least during the hunting season year after year in at least the more heavily motorized Geographic Areas. The number of new illegal user-created routes on the landscape also seems to increase every year. While the level of this illegal use is unknown, it is occurring and adds to the issues involving elk habitat effectiveness and elk security.

Noxious Weeds

FWP is quite concerned about the limited amount of monitoring for noxious weeds that is to occur as part of this project (EA states that monitoring will only be once per year) given that noxious weeds can flower and produce seeds throughout the entire growing season. FWP would recommend a significant increase in the level of monitoring/treatment that is to occur for noxious weeds given their potential to negatively impact wildlife habitat.

Fire and Grazing Effects

FWP appreciates the recognition given to and the steps that will be taken to protect key wildlife browse species such as mountain mahogany, antelope bitterbrush, big sagebrush and various hardwood browse species. However, we are concerned about the potential project impacts to important mule deer browse species such as common juniper and horizontal juniper which are the primary browse species used by mule deer in many areas and often the only available browse species available to mule deer in some areas. The EA does not speak to these species.

The EA’s Livestock Grazing Report states that “treatments within encroachment areas would be the subsequent increase in the quantity of perennial grasses and forbs resulting in improved forage quality and quantity for grazing animals.” While this may occur, there was no fire effects analysis done on the forage species to be burned to support this conclusion. Plant species response to fire varies by species and depends upon such things as burn timing, fire severity, plant physiological characteristics, etc. Impacts to individual plant species may be positive or negative.

Other potential impacts identified by the Livestock Grazing Report included:

- Treatments may limit the level of grazing rotation or deferment during the temporary closure.
- Additional impacts may include concentrated livestock grazing within seeded areas once they are established.
- The potential of improved road access and maintenance may provide greater access to portions of the affected allotments.

However, there was no discussion in the EA on what the impacts to wildlife, particularly elk, may be if these things were to occur or what mitigations would occur to reduce the impacts to grazing wildlife such as elk. The project has the potential to open new areas to livestock grazing that were previously only used by wildlife resulting in negative impacts to wildlife species such as elk. The EA does not speak to this potential impact. Any potential positive impacts to forage availability for wildlife species such as elk and mule deer from the proposed project will be limited, if their ability to use that forage is restricted or limited because of the direct or indirect effects of livestock grazing.

Capacity to Implement

FWP welcomes and supports the potential scale of this project regarding the number of acres to be treated on an annual basis, and recognized the potential benefits to ungulate forage quality that can result from prescribed burning. However, FWP questions the HLC's ability to implement the project given the relative lack of progress being made on already existing HLC vegetation management projects.

A mosaic of burned and unburned areas within each treatment area, as well as a mosaic among treatment and non-treatment areas should suffice in providing the diversity of habitat needs that ungulate species have throughout the year. For species like mule deer that show high fidelity to specific summer ranges, habitat treatments may not impact individual mule deer unless they are placed within an individual's existing summer home range. Therefore, to maximize impact on mule deer populations, treatments should be placed in known or predicted mule deer summer range. Whereas elk show less fidelity to specific summer ranges and may shift their summer use to take advantage of areas that have been treated with prescribed fire. FWP urges consideration of this behavioral nuance when considering and selecting treatment areas.

Although the Draft EA and appendices provided breakdowns of "eligible for treatment" habitat types for elk, there was little further explanation regarding priorities or the selection process for treatment areas. If possible, FWP would appreciate opportunities to be involved in the process Identifying treatment areas.

FWP is pleased to see reference to annually sharing a suite of planned activities with the public and with partners, as well as the commitment to incorporate local information prior to implementation. We look forward to sharing more treatment area specific feedback when those opportunities arise.

In conclusion, we appreciate the opportunity to provide feedback and look forward to further discussions on specific treatment areas. We are committed to collaborating to ensure the project's success while minimizing adverse impacts on wildlife.

For further questions or concerns, please reach out to the following FWP personnel:

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Thank you for the opportunity to comment, and we look forward to working with you.

Sincerely,



Adam Pankratz

Acting Region 3 Supervisor