

**Region One****490 North Meridian Road****Kalispell, MT 59901****(406) 752-5501****Ref:LA29-24****September 5, 2024**

Kootenai National Forest
Canoe Gulch Ranger District
12557 Highway 37
Libby, MT 59923

Re: Norman McCedar Project

Montana Fish, Wildlife & Parks (FWP) appreciates the opportunity to comment on the Norman McCedar Project. In reviewing the Environmental Assessment (EA) and proposed action, FWP supports the concept of maintaining a mosaic of cover and forage opportunities. The EA also states that most of the units are below 40 acres in size. The juxtaposition of the units, however, suggests that the openings created by clearcuts will create a large area of essentially no or limited cover for wildlife, limiting the effectiveness of the mosaic mentioned in the EA. Table 12 references patch sizes. Patches 6-10 are a conglomeration of clearcuts that would create large openings exceeding 125 acres.

FWP's concern in relation to winter range is "large" (>125 acres) openings since they reduce the likelihood ungulates will use their interior when snowpack is high (Lyon and Jenson 1980, Irwin and Peek 1984, Sweeny et al. 1984). Smaller openings (< 125 acres) would be beneficial, increasing the amount of edge between openings and cover. Therefore, FWP recommends reducing these opening by prescribing treatments within them such that a mosaic of canopy cover is created (e.g., thin some units rather than clear cut all of them). This will allow for areas with increased snow intercept and security to be adjacent to feeding areas (less canopy), which will increase the likelihood of use by ungulates (including moose) during the winter and the summer. Timber characteristics beneficial for winter use of ungulates include: snow intercept and security of mature forest stands with a closed canopy (>60%; Dusek et al. 2006), the promotion of non-deciduous conifer (Douglas fir, Ponderosa pine) recruitment post-harvest, visual screening, and timing of use restrictions.

FWP also has concerns regarding leaving roads NFSR 402 and NFSR 4727 open past August 30 due to the effect on elk utilizing the area during archery season. One of the stated goals of the project is to increase forage production for ungulates. Studies related to elk distribution and roads indicate elk avoid areas with open roads, including during archery season (Conner et al. 2001, Vieira et al. 2003, Proffitt et al. 2013, Ranglack et al. 2017). Leaving roads open to motorized use during the archery season may push elk out of the area and limit access to the improved forage conditions generated by this project. Not only will this influence distribution, but there could also be long-term effects on nutritional condition, pregnancy rates (Davidson et al. 2012) and reproduction (Proffitt et al. 2017). The fall is an important

time of the year when female elk and other ungulates select for areas of forage with high nutritional value (Cook et al. 2004, Cook et al. 2013, Monteith et al. 2014, Ranglack et al, 2017). It could also impact survival rates of calves looking to gain weight prior to winter. Maintaining road closures during the archery season would allow elk (and other ungulates) to better take advantage of the increased forage availability through the fall.

If you have any questions, please feel free to contact Neil Anderson, FWP R1 Wildlife Program Manager at (406) 751-4585.

Sincerely,



Lee Anderson
Region 1 Supervisor
Montana Fish, Wildlife & Parks

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