



Region 3

730 N. Montana, Dillon, MT 59725

September 28, 2020

Jamie Tripp & Molly Ryan, District Rangers
Beaverhead-Deerlodge National Forest
420 Barrett St. Dillon, MT 59725

RE: Selway-Saginaw Vegetation Management Project

Dear Ms. Tripp and Ms. Ryan,

This letter is in reference to the proposed Selway-Saginaw project on the Beaverhead-Deerlodge National Forest. Montana Fish, Wildlife & Parks (FWP) commends BDNF's efforts to integrate projects to improve forest, riparian, and range conditions with commercial timber harvest. Past land management and fire suppression has minimized disturbance, leading to conifer encroachment and large areas of late seral stage forests. This project has the potential to restructure a large portion of the landscape towards early seral stages which could improve habitat for diverse wildlife species. Moreover, this project is complementary to the ongoing Selway Creek native fish restoration project FWP and BDNF have partnered on by improving riparian conditions and potentially instream flow. Considering the large scale of the proposed actions and its consequences to wildlife and fish habitat and populations, FWP offers the following comments.

General Comments

As the Selway-Saginaw project develops, FWP encourages careful consideration of the effects that road and travel management may have on wildlife. For many wildlife species, decisions concerning the road system may be the most enduring legacy of this project. In general, modification/improvements to roads will likely change use patterns even when road designations remain unchanged. The potential for over 117 miles of road improvements and reconstruction to influence human use and reduce security for wildlife species is substantial. Many of the roads designated as closed in the system are in various stages of revegetation due to disuse. Reconstruction has the potential to increase human traffic in these areas and reduce security for wildlife species even when the road is designated closed to motorized travel. Furthermore, the rapid increase in Off-Highway-Vehicle (OHV) prevalence makes enforcement of those closures more difficult. We encourage BDNF to obliterate these roads, or portions of these roads, after project completion whenever possible.

Road improvements, combined with the extensive amounts of timber harvest and thinning proposed along these roads, could have cumulative impacts on big game security cover. We request the size and/or density of cut units be reduced to retain security cover between openings (see specific examples below). In addition, security in treatment units may be improved by retaining tree densities between roads and the interior of cut blocks to screen animals from the road. Similarly, we request that vegetative sediment filter be retained whenever potential runoff of road fill material could reach streams and for the USFS to obtain SPA 124 permits from FWP for any stream crossing installation,

maintenance or upgrades. Finally, we urge BDNF to consider extending current seasonal road closures beginning on October 15th to begin on September 5th. The increasing popularity of archery hunting, combined with socio-economic and technological changes, has increased the duration and intensity of hunting pressure on elk. Extending seasonal closures of motorized routes to include the archery season would increase the availability of secure habitat not only for elk, but also other big game species and carnivores.

We advocate for a robust survey and monitoring system as this project moves forward. The number and scale of the various vegetative treatments offers an excellent opportunity to evaluate their effectiveness in producing desired conditions. There is widespread interest in using fire and mechanical means to address conifer expansion to improve sage-brush and riparian conditions. Rigorous before-and-after sampling of species composition and other metrics may provide insights into the efficacy of similar treatments on the BDNF and adjacent landownerships.

Site specific comments

Coyote Creek Area in Upper Horse Prairie MA

Proposed treatments in the Upper Horse Prairie MA includes extensive use of prescribed burns, and/or thinning with prescribed burns, to address conifer expansion. We believe this will be largely beneficial in improving riparian conditions, deciduous tree and shrub communities, and sage-brush communities. In the same area there are plans to harvest timber along the length of Coyote Ridge and Lodgepole Ridge fronting FS roads 7301A and B. Much of the proposed thinning and cutting in this area can be expected to have positive effects on productivity of grasses, forbs and deciduous shrubs. However, reducing cover along the length of this ridge could negatively impact security for big game and carnivore species. To facilitate movement across this ridge we suggest eliminating harvest in unit 115. This harvest unit is on a steep, north facing slope and post-harvest productivity can be expected to be low. In addition, the steep terrain may result in high erosion. This unit should remain a secure area for species that currently use it (e.g. moose, elk, deer) to move between the Selway and Upper Horse Prairie MAs. Similarly, we suggest retaining patches of timber in the saddles along Lodgepole Ridge within harvest unit 135 to facilitate connectivity.

Surveyor Creek Area in Selway MA

The project proposes extensive harvest and thinning operations on the west side of Selway creek between Forest Road 181 and Hidden Creek. Treatment in this area could have a positive effect in increasing productivity of grasses, forbs and deciduous shrubs. However, the high density of proposed cuts over a large area could be detrimental for species relying on forest cover. We suggest eliminating at least two to three commercial harvest units in this area to provide a mosaic with a greater representation of forest cover. Harvest units in areas expected to be less productive in producing diverse grass, forb and shrub communities would make good candidates for elimination.

Indian Creek Area in Selway MA

The current proposal calls for re-routing FSR 71261 and introducing a new Admin road (UAdd-3) to create two roads crossing through the Indian Creek RCA approximately 300 meters apart. The roads would be surrounded by large commercial harvest units which span a large portion of the Indian Creek drainage. We suggest eliminating the new administrative route and reducing the size of harvest units 295 and 325 to increase security for wildlife and minimize impacts to the stream.

FR 919 overlooking Governor Creek in Selway MA

Harvest units 305, 310 and 315 could potentially open a large tract of land overlooked by FR 919. This could discourage use by wildlife species sensitive to human disturbance. The value of these harvest units could be improved by leaving a swath of timber along the road to screen animals using the cuts.

FR 7335 in Selway MA

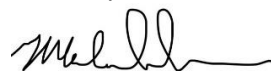
Extensive timber harvest is proposed along the length of FR 7335 north of Little Indian Creek. If the proposed harvests occur, they would open large tracts of land on both sides of the road with consequences for big game security. Reduced security could result in an increasing number of elk abandoning this area to move to private land in the Big Hole. We suggest eliminating 2 or more of these commercial harvest units or reducing the size of units to increase security for elk and other species along FR 7335.

Sheila Ridge in Selway MA

Currently, the area along Sheila Ridge contains a productive edge habitat for edge-affiliated species and provides open sagebrush south facing slopes with dense conifer stands on north facing slopes. I suggest caution in proposing treatments to this area given its current value to wildlife. Currently, Sheila Ridge suffers occasional illegal OHV incursions. Road improvements associated with treatments would likely exacerbate illegal motorized use creating further challenges for enforcement. Furthermore, we urge BDNF to eliminate harvest units 440 and 335. These units are predominately on north facing steep slopes that are best suited for security cover. Timber harvest in units 440 and 335 could eliminate security cover and reduce the value of the ridgeline edge habitat for game species.

In summary, FWP supports systematic, sustainable forest treatments on public lands and believe your proposed project has the potential to provide considerable benefit to wildlife and fish habitat and populations. Thank you for considering FWP's comments to maximize these project benefits. If we can be of any assistance to you as you move forward with your planning, please contact us.

Sincerely,



Mark Deleray
Region 3 Supervisor