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Title:

Comments: Please accept these comments on behalf of the American Forest Resource Council. I am also including two pertinent studies.

January 23, 2020

Bitterroot National Forest Attn: Forest Plan Amendment 1801 N. First Street Hamilton, Montana 59840

Dear Planner:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Bitterroot National Forests evaluation of the need to conduct a programmatic amendment for elk habitat objectives under the 1987 Forest Plan.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Bitterroot National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC is in support of the Bitterroot National Forest evaluating the need to conduct a programmatic amendment for elk habitat objectives under the 1987 Forest Plan. There has been a significant number of new studies that can be valuable as you consider not only the needs of elk, but also for the health of the Bitterroot National Forest. This new information highlights the importance of quality and quantity of forage versus cover needed for elk, particularly during summer when calf elk are young and for winter feed. These studies point out and AFRC supports that good forest management is key to not only healthy forests, but also healthy elk populations.

AFRC is interested in the Bitterroot's forest and elk management policies because our members depend

on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present day needs but also important for needs in the future. This future need for

timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments effect the long-term sustainability of the timber resources on Forest Service managed land. The same can be said for the needs of elk and other species that depend on quality habitat from our national forests. AFRC has voiced our concerns many times regarding how various treatment regimens impact long term supply timber supply and wildlife forage. In particular, we have stressed that a management regime that only thins mid-seral forest stands is ultimately unsustainable. We feel this is not only the case for forest management, but also the case for elk. If the Forest Service truly wants to manage timber and elk in a sustainable manner then it must find a way to incorporate regeneration harvest back into its management paradigm. The difficulty that the Forest Service has had implementing regeneration harvests in mature timber has resulted in an unbalanced age-class distribution across the Forest, particularly in the 0-20 year age class. This void concerns AFRC and raises the question of where future timber products off the Forest Service will come from. This void also points out the lack of early seral forage that has been available for elk over the same 20-30 year period.

Our current forest conditions in Montana show millions of acres of dead and dying timber that is ripe for wildfire. Areas of heavy fuels and down and dead timber does not present good habitat for elk. Thus we want to make clear in these comments that the solution to both healthy forests and healthy elk herds is sustainably managing our forests using a variety of harvest regimes including regeneration harvest.

The above chart shows that Montana is leading the western United States in number of dead trees with 1.237 billion dead trees. Obviously this extreme mortality creates huge implications for wildfires and for the wildlife that uses these forests, and emphasizes the need for more management.

AFRC would like to reference a study that was completed in 2018 that looked at the relationship of forest structure to quality of elk forage (included). Much of the data from this study came from the Bitterroot National Forest and surrounding areas- [ldquo]Evaluating & Informing Elk Habitat Management[rdquo] by DeVoe et.al. In that document it states [ldquo]Forage abundance and forage quality may also be enhanced through timber harvest treatments that reduce overstory canopy cover. We suggest that focusing management treatments on public lands and in forest vegetation types that are common within a region but with lower nutritional value may be one tool available to attract more elk onto public lands during the summer and reducing the redistribution of elk to private lands prior to and during the fall hunting seasons. Managers could also consider forest treatments in areas identified as important seasonal travel corridors for elk. Combining forest treatments with other strategies, such as reducing availability of high quality nutritional resources on private lands

to elk, increasing hunter access on private lands, or altering harvest regulations to more evenly distribute harvest risk across public and private lands, may provide a more holistic approach to encouraging elk to remain on public lands.

Much of the DeVoe study compares the effects of no disturbance, wildfire and prescribed burns and silvicultural treatments. One significant finding outlined includes [ldquo]Across disturbance types, the highest predicted TIN (Nutritional Value) values that were significantly different from the undisturbed class occurred in areas thinned [ge]21 years prior (7.5% greater), followed by areas clearcut [ge]21 years prior (6.7% greater) and areas thinned 11-20 years (5.5% greater) prior.

Other takeaways from the study include:

[middot] Distribution and availability of high quality nutrition provided by landscape disturbances[mdash] including prescribed fire, forest thinning and openings[mdash] strongly influenced elk distribution.

[middot] Forage abundance and quality may be enhanced through timber harvest treatments to attract more elk onto public lands.

Land managers depend on a variety of options to improve forest health within a particular watershed. The overall goal is to create a diversity of forest succession (herbs, shrubs, grasses, young and mature forests). This requires utilization of all active forest management tools:

- [bull] Timber Harvest (selective cut, clearcut, shelterwood cut, seed tree harvest, etc.
- [bull] Prescribed burning
- [bull] Reforestation
- [bull] Weed management
- [bull] Grazing

An intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The road consideration for this elk programmatic amendment needs to consider both roads needed for management that may simply be closed without taking out of the Forest system of roads. A permanent removal of roads will likely defer management of those forest stands that they provide

access to. The land base covered in the Bitterroot National Forest need to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency[rsquo]s ability to

achieve these objectives and is very concerning to us.

We would like the District to carefully consider the following three factors when making a decision to decommission any road in the Bitterroot National Forest:

1. Determination of any potential resource risk related to a road segment
2. Determination of the access value provided by a road segment
3. Determination of whether the resource risk outweighs the access value (for timber management and other resource needs including elk management).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.

Thank you for the opportunity to provide comments regarding the Bitterroot's effort to evaluate the need to conduct a programmatic amendment for elk habitat objectives under the 1987 Forest Plan. Please keep me informed as this effort moves forward.

Sincerely,

Tom Partin AFRC Consultant

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