Data Submitted (UTC 11): 9/29/2023 9:09:08 PM
First name: Lynsay
Last name: Maykuth
Organization: Montana Fish Wildlife & Parks
Title:
Comments: Re: Dry Riverside Project - Environmental Assessment

Dear Mr. Blazejewski,

Thank you for the opportunity to comment on the Dry Riverside Project, which has been designed to improve diversity and resilience of terrestrial ecosystems and vegetation, promote fire resilient forests by addressing forest fuels, and provide forest products to contribute to economic sustainability. A stated project priority is to increase species diversity and promote growth of large and very large tree age classes. The proposed project area provides habitat for black bears, grizzly bears, moose, white-tailed deer, mule deer, elk, mountain lions, wolves bobcats, lynx, wolverine, various forest carnivore species and small mammals, western toads, as well as numerous avian species. The project area is year-round grizzly bear habitat. Besides providing important denning and spring habitat, our GPS data indicates it is highly used by bears during summer and fall, likely associated with huckleberry foraging and fall hyperphagia. The project area also serves as year-round habitat for a nonmigratory population of elk.

Elk in forest-dominated landscapes, like those found in the South Fork of the Flathead within the Dry Riverside project area, are limited by forage production. Elk pregnancy rates, calf growth, body fat levels and the ability to withstand harsh winter weather all tie to the quantity and quality of what elk eat between June 1 and October 31. When forest canopies close, forage quality rapidly declines. Several elements of this project, which will reduce canopy cover, will benefit elk and other wildlife by increasing understory diversity and forage production. Prescribed fire units on south and southwest facing slopes are habitat restoration initiatives that will revitalize range conditions by reducing conifer encroachment and rejuvenating decadent shrubs. These slopes with their accessible browse provide important food resources during the lean months of winter and early spring. Grizzly bears may also benefit from this project if canopy openings are done in a manner that increases berry and other food production while limiting construction of new or open roads and maintaining or enhancing current levels of secure core habitat. Planned carefully, for example by maintaining security cover, visual screening, and avoiding sensitive areas, many of the project's elements will benefit wildlife and are supported by Montana Fish, Wildlife and Parks. These elements include:
*Measures to increase forest diversity and resilience including reduction of conifer competition to promote hardwood tree species and early seral shrub species.
*Prescribe burn units, which will benefit forage and browse production.
*Restoration of white bark pine, a species important for snow retention and food production.
*Retention of large and very large size class trees and a management direction to promote their development.
*Incorporation of the Northern Continental Divide Ecosystem (NCDE) Grizzly Bear Conservation Strategies into project design, and cutting prescriptions, phasing, and timing.
*Design features that protect and restore aquatic and riparian habitats including no-cutting areas around sensitive habitats, retention of buffers around wetlands and portions thereof, and plans for culvert removals and replacements to promote aquatic connectivity.

In addition, we applaud the Forest Service's incorporation of treatment prescriptions that retain stand characteristics conducive to continued and future winter range use by elk and mule deer: PDF-WL-06 and PDF-WL-07. Retention of 50% canopy within commercial thinning units, and retention of full-crowned species in both commercial thinning and regenerations units will promote winter range characteristics now and into the future.

FWP encourages the use of visual screening - higher stocking rates - adjacent to roadways to reduce wildlife disturbance and big game vulnerability.

Thank you for the opportunity to comment on the Dry Riverside Project. We are excited by the potential wildlife benefits of this forest action. Montana Fish, Wildlife & Parks looks forward to collaborating with the Forest Service on project specifics as the project advances. If you have questions, please contact our Kalispell Area Wildlife Biologist, Franz Ingelfinger: fingelfinger@mt.gov.

Sincerely,

Lee Anderson
Regional Supervisor

Literature Cited:
Vore, J.M., T. Hartman, and A. Wood. 2007. Elk habitat selection and winter range vegetation management in northwest Montana. Intermountain Journal of Sciences. 13(2): 86-97