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Lolo National Forest Supervisor's Office

Attn: Amanda Milburn - Lolo Plan Revision

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Forest Plan Revision Team,

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the Lolo National Forest scoping for the Forest Plan Revision.

The mission of RMEF is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. RMEF's 225,000+ members include hunters, ranchers, guides, outfitters, other business owners, wildlife enthusiasts, and other conservationists who have both recreational and economic interests in hunting and enjoying elk on National Forest lands. Since 1984, RMEF has conserved and enhanced more than 8.9 million acres of North America's most vital habitat for elk and other wildlife. RMEF has conserved or enhanced more than 3.8 million acres across U.S. Forest Service (USFS) lands and opened or improved public access to over 360,000 acres. Together, the combined value of RMEF-USFS cooperative efforts totals more than \$388 million. In Montana, specifically, RMEF and partners have conserved or enhanced over 940,000 acres.

RMEF recognizes the Forest Plan Revision process under the 2012 planning rule is designed to emphasize restoration of natural resources to make our public lands more resilient to climate change, protect water resources, and improve overall forest health. Within that context, RMEF requests that the following recommendations be considered as the planning process proceeds:

GENERAL COMMENTS:

Inclusion of Elk and Elk Habitat in Planning Efforts

Healthy, free-roaming elk herds contribute to and are intermingled with the social well-being, ecological integrity, cultural, and economic goals of the Forest. Elk and other big game serve 'distinct roles and contributions' to multiple user types on the Forest (wildlife viewing, hunting, etc.) and the Forest Plan plays an important role in supporting future big game populations. RMEF recommends recognition of elk as an important species that provides economic and cultural value.

Coordination with State Wildlife Agencies

RMEF works closely with each state's wildlife agency. These agencies are our vital partners. In setting new management directions in Forest Plans, RMEF encourages coordination with each state wildlife agency - and that state agency goals for elk/elk hunting are considered. RMEF recommends including forest vegetation, timber, wildlife habitat, and recreation goals that help manage wildlife populations at levels meeting Montana Fish, Wildlife and Parks (FWP) big game management plan objectives.

Connectivity

Wildlife habitat connectivity is increasingly threatened by habitat loss and degradation, as well as development activities. RMEF recommends Plan components that recognize the importance of big game movement corridors and include management direction for conserving corridors across National Forest and neighboring lands.

Science-based Management

RMEF appreciates USFS recognition and use of the best available science to guide the assessment. Past and recent research has identified several challenges to North America's elk country, including unnaturally dense forests, invasions of weeds, lack of dependable water sources, and many others. RMEF often leans on the past 25+ years of research from the Starkey Project and other studies that have laid the groundwork for managing healthy elk habitat (Wisdom 2005). More recent research on ungulate migration (Kauffman et al. 2020, 2022), nutrition (Cook et al. 2013, Rowland et al. 2018), and elk security (Wisdom et al. 2018, Miller et al. 2020) continue to build on this foundation. RMEF recommends that recent research on the benefits of actively managed landscapes, impacts of high use recreation, wildlife connectivity, etc. continue to inform Plan components.

COMMENTS SPECIFIC TO THE PLAN ASSESSMENT SECTIONS:

Ecosystem Drivers and Stressors

Fire and Fuels

* RMEF supports a landscape-scale approach to increase the pace and scale of fuels reduction across the Lolo National Forest. USFS lands have been at the forefront of severe wildfires over the past several years. The impacts of larger and more severe fires have been widespread, affecting wildlife habitat, recreational opportunity, and local economies. Given the multiple landowner framework of the project area, RMEF recommends including cross-boundary opportunities for active management and fuels reduction across private, state, and federal lands using tools such as good neighbor authority, shared stewardship, etc.

* RMEF recommends the recent Bipartisan Infrastructure and Jobs Act and subsequent USFS Wildfire Crisis Strategy (2022) be incorporated in future planning efforts.

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Invasive Species

* Noxious and invasive species are slowly replacing native forage for elk and other species and impacting forest resources. RMEF encourages the USFS to prioritize controlling and reducing invasive weeds through an integrated weed management approach (biological, mechanical, chemical, and outreach). Early detection and rapid response remain a critical component of effective weed management (Westbrooks 2004). Native plant communities provide the highest nutritional value for wildlife; RMEF

encourages the use of native plant seed mixes in all restoration work.

Forest Vegetation Management

* The ecological integrity of forest ecosystems is dependent on maintaining vegetation diversity. RMEF supports a focus on a more heterogeneous forest structure, restoring more frequent fire, increased reforestation, and sustaining the existing late successional stage, all with an adaptive management framework given changing conditions and new information.

* Aspen stands represent a unique ecosystem, providing a variety of services. With an expectation of continued aspen decline, RMEF supports a focus on restoring prescribed fire treatments, removing conifers, and excluding herbivores in clones that are impaired or in decline, and revisiting current classification objectives.

* RMEF is very supportive of active management on our public lands to benefit wildlife habitat and fire risk management. Executing active forest management techniques such as prescribed burns, thinning, and other treatments helps prevent severe wildfires and assists in long-term ecosystem resilience. In addition, managing natural ignitions can help achieve fuel and vegetation goals.

* Early seral forest provides important habitat for elk and other wildlife and is often achieved following disturbance. Decades of fire suppression have reduced early successional stages across USFS lands. RMEF supports the use of mechanical thinning and prescribed burning to encourage growth of grasses, forbs, young shrubs, and trees that provide critical forage and cover for elk and other species.

Fish and Wildlife

* Nearly 400 fish and wildlife species occur on the Lolo National Forest, several that contribute significantly to the broad ecosystem integrity and deliver ecosystem services (recreational, aesthetic, vegetation health, etc.). In addition to at-risk species, the Forest Plan is integral in helping ensure common species remain common. RMEF recommends consideration of fish and wildlife that are not identified as 'at risk' and their full integration in the Forest Plan Revision.

Social and Economic Elements and Multiple Uses

Recreation

* For many hunter-conservationists, public lands provide the best opportunity to pursue their hunting heritage. These activities deliver economic benefits for local communities, as well as cultural and social benefits. RMEF strongly encourages inclusion of hunting, fishing, trapping, and shooting sports as contributing to local economies and the well-
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being and quality of life of forest land users. The Plan should provide for the continuation of these activities as a valid and vital component of the recreation spectrum. The Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding between the U.S. Department of Agriculture, the U.S. Department of the Army, and the U.S. Department of the Interior (2011) develops and expands a framework of cooperation among the partners at all levels for planning and implementing mutually beneficial projects and activities related to hunting, fishing, trapping, and shooting sports conducted on federal land.

* With dramatic increases in public land use, RMEF recommends inclusion of past and recent research on the potential impacts of recreation to elk and other wildlife (e.g., Wisdom et al. 2018, Marion et al. 2020, Miller et al. 2020, Dertien et al. 2021, and others). Specifically, research from the Starkey Project has done much to quantify effects of roads, trails, and associated motorized (Wisdom et al. 2005) and non-motorized traffic on elk (Wisdom et al. 2018). RMEF supports a balanced approach regarding the Recreation Opportunity Spectrum. Multi-use activities occur year-round

and RMEF recommends that the USFS provide access for those seeking varied experiences (primitive and roaded). However, RMEF also recommends inclusion of Plan components that provide seasonal protection (during critical times) for elk and other wildlife from impacts of recreation (via roads, trails, and associated motorized and non-motorized traffic). Timing restrictions should be based on the best available science as well as site-specific factors (topography, available habitat, etc.)

Land Ownership, Status, Use, and Access

* Identified as a significant barrier to maintaining hunting and angling participants, access to public land plays a critical role in ensuring the future of our hunting heritage (Eliason 2020). RMEF recommends consideration of public land access needs in USFS planning efforts, including close collaboration with FWP to create or maintain access points to USFS lands that are important for managing wildlife. In addition, RMEF recommends inclusion of relevant components within Executive Order 13443 on facilitation of hunting heritage and wildlife conservation (2007), the John D. Dingell, Jr. Conservation, Management, and Recreation Act (2019), and the Great American Outdoors Act (2020).

* Realty-Use Authorizations: RMEF recommends inclusion of Plan components that seek opportunities to improve road and trail rights-of-way for access to hunting, fishing, and other recreational opportunities.

* RMEF supports Plan components recognizing that acquisition or land ownership adjustments should improve management of USFS lands by consolidating land ownership, providing public access to public lands, and conserving and enhancing resources. Components should include land tenure goals and objectives to support recreational priorities identified in the Dingell Act, utilizing section 4105 (Land and Water Conservation Fund).

* RMEF recommends inclusion of Plan components that seek opportunities to maintain or increase public land connectivity across USFS lands through land acquisitions, land transfers, etc., and prioritize such actions based on increasing public access, habitat connectivity, wildlife corridors, enhancement of recreational opportunities, etc.

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* RMEF recommends that the Forest Plan Revision be intricately connected to travel management goals.

Designated Areas

* RMEF supports active management on our public lands to benefit wildlife habitat and manage fire risk. Wilderness (Wilderness Areas, Lands with Wilderness Characteristics, and Wilderness Study Areas) and other special designations often restrict active land management activities that are needed to ensure healthy, sustainable landscapes. Given the current condition of many public forests and rangelands, RMEF supports planning components that limit additional wilderness and other special designations

that may limit management options.

Timber

* Given the importance of timber harvest for managing fuels and wildlife habitat, RMEF encourages creative solutions to maintain timber as a predominate factor in sustainable forest management, particularly given recent local industry closures.

Rangeland Management

* Managed livestock grazing can improve the health of rangelands and forest meadows if the system is designed with habitat values for elk and other wildlife in mind. An effective range management program between the agency and permittees is essential to maintaining the economic base and lifestyle that have helped keep private lands across elk country as working ranches. RMEF encourages the USFS to employ grazing management systems and techniques compatible with maintaining desired levels of elk

and other wildlife.

Hunting, Fishing, Trapping and Shooting Sports

* Hunting is an integral part of North American cultures and provides a strong connection to the outdoors for millions of people, generating billions of dollars to local and national economies (Arnett and Southwick 2015, Chapagain and Poudyal 2020). RMEF encourages inclusion of hunting, fishing, trapping, and shooting sports as contributing to local economies and the well-being and quality of life of forest land users.

RMEF appreciates the opportunity to engage in the Lolo National Forest planning process. We look forward to reviewing the Draft Plan, when available.

Sincerely,

Karie Decker
Director of Wildlife and Habitat

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