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Comments: February 12, 2021Dear USFS - Ashland Ranger District,I am writing this letter in support of the proposed South Otter Restoration and Resiliency Project. After reviewing the planned management activities, I have found the project to be vital in maintaining and improving habitat benefits to big g?-Jile, sharp-tailed grouse, and wild turkeys over the long term. While these approaches will reduce cover over the short term in some portions of the Ashland Ranger District, I believe the proposed management actions will increase the likelihood of available cover being maintained over the long term. If no action is taken the project area will be at much higher risk of catastrophic wildlife. This will increase risk to human life, private property, and security habitat for big game.The proposed project is well planned. I also recommend the following adjustments or additions to the plan in order to further improve wildlife habitat in the project area.When broadcast burning in non-forest habitats, I strongly suggest avoiding areas that contain shrubs, and in particular sagebrush (Artemisia spp). While I recognize it is unfeasible to avoid all individual shrubs, please withdraw areas that contain even moderate densities of shrubs to avoid killing them. Sagebrush has a long recovery time and its benefit to big game and sharp-tailed grouse may be lost for decades. If withdrawing a portion of the proposed acres that contain sagebrush is not feasible, please try to limit shrub mortality when possible.When prescribed burning near or through woody draws, please ensure that the fire intensity will have a minimal effect on the deciduous shrubs and trees present. Woody draws are vital components of habitat for a myriad of wildlife species. They are also fairly limited in extent, making the existing patches highly valuable. Additionally, I suggest completely removing or significantly reducing Ponderosa Pine (Pinus ponderosa) and/or Rocky Mountain Juniper (Juniperus scopulorum) trees in and near hardwood draws. By creating a buffer (perhaps of 50- 125 feet) between the hardwood draws and conifers it will reduce competition and shading, thereby enhancing hardwood stands. Additionally, it may be beneficial to fell and leave a few downed conifer trees around or even within hardwood draws (especially Aspen stands) - this creates a physical barrier that will reduce browsing by cattle and wild ungulates, allowing young shrubs to establish and for more of them to grow above the browse zone. Unfortunately many hardwood draws contain a small number of mature trees with very few to no young, recruiting trees; much of this can be attributed to over-browsing by domestic and/or wild ungulates.When thinning small to large trees and/or conducting understory thinning I suggest creating a patchy distribution of tree clusters where and when it is feasible. This will create a mosaic of tree density, and the small patches of cover will functionally serve as hiding cover for game species, perhaps most of all for white-tailed deer (especially the "doghair" patches). Even relatively small patches of cover can often times provide a significant hiding cover component, which has potential to increase security and perhaps survival of multiple wildlife species.When creating openings during treatments (e.g., Commercial Thinning with Regeneration Cuts and Seed Tree), I suggest designing them to be irregular in shape (i.e., not square or rectangular) when and where it is feasible. By creating openings that have curved edges, inside comers, bends, etc it will increase the amount of edge. This will make it harder for predators to hunt these edge habitats which tend to be where many species spend much of their time, and will create more visual barriers which make it harder for predators and humans to detect prey and may reduce human disturbance on wildlife.I suggest targeting natural springs when conducting timber thinning or removal. In semi-arid and arid landscapes, trees that have established near springs can consume enough water to cause the spring to go dry, or at least not allow that water to come to the surface as abundantly. This reduces the amount of surface moisture available for grasses, forbs, shrubs, and hardwood trees. I suggest that Ponderosa Pine and Rocky Mountain Juniper trees be completely removed or reduced to a very low density directly adjacent to known springs, whether dormant or active. This treatment has been applied to many locations in western North America, with very quick results of springs beginning to flow above ground again and significant increases in herbaceous and shrub growth.When thinning trees near publicly accessible roads, I suggest leaving strips of trees along roadways. Depending on the site, terrain, and available trees, this may range from 50 feet up to 300 ft from roadways. By leaving these trees in place, the habitat security will likely be greatly enhanced compared to removing trees all the way to the road. The disturbance of wildlife by vehicles should be lessened, and it will likely

reduce the sightability of game from roads. Again, this will hopefully increase survival (directly and indirectly) of many game species, allow wildlife to effectively use more of the available habitat, and perhaps improve the likelihood that game will use public lands more often and for longer periods of time.While some objections may be made regarding the large scale and number of acres treated in this project, I would like to offer my support for it. While the geographic and acreage scale does seem large, it is important to remember that the time span (scale) is over 10-20 years. This means that the treatment progression will help to maintain and create a mosaic of habitat types and a diversity of timber stand ages.Finally, I would like to make specific mention of my agreement with treating the 15 Mile, Elk Creek, and Green Creek units first. These areas either contain large expanses of thick timber stands and/or are adjacent to such areas. By targeting these units first, some of the most vulnerable portions of the project area will be enhanced and protected. I would suggest to also include the Poker Jim unit (especially the northwest portion of it) as one of the first priorities for the same reasons.I want to thank you for the opportunity to review and comment upon this proposed project. Thank you for all the work you do on behalf of the public, wildlife, habitat, and the local economy. If you have any questions regarding this letter, please feel free to contact me.Ryan DeVoreWildlife Biologist. Broadus DistrictWildlife DivisionMontana Fish, Wildlife & Parks, Region 7