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April 20, 2021

Seth Carbonari, District Ranger  
West Fork Ranger District  
6735 West Fork Road  
Darby, MT 59829  
[Seth.Carbonari@usda.gov](mailto:Seth.Carbonari@usda.gov)  
<https://cara.ecosystem-management.org/Public/CommentInput?Project=55744>

Subject: Mud Creek Vegetation Management Project #55744 (West Fork Ranger District,  
Bitterroot National Forest)--Draft EA

Dear Mr. Carbonari:

Montana Fish, Wildlife & Parks (FWP) again appreciates the opportunity to provide information on the fish, wildlife and recreation resources in the vicinity of the Bitterroot National Forest's (BNF) proposed Mud Creek Vegetation Management Project, located west and north of Painted Rocks Reservoir in Ravalli County. We have reviewed the Draft Environmental Assessment (EA) and would like to offer the following comments for your consideration.

Took Loop (Mark's Loop)

One of our primary concerns with this project lies in the creation of new OHV loops through the heart of the project area. Recognizing that much of this trail mileage is already open seasonally to motor vehicle use--with winter/spring closures in place to reduce disturbance to wildlife--connecting these trails with new roads to create loops would likely cause a substantial increase in use. Of particular concern is the Took Loop (EA Appendix C-2, Map 2; named "Mark's Loop" in other documents), located on the northwest side of Painted Rocks Reservoir.

This area is extensively used by the Painted Rocks bighorn sheep herd, which utilizes the cliffs and meadows immediately adjacent to the proposed loop for lambing and foraging. Sheep are frequently observed on these slopes year-round, and data obtained from recently collared individuals (rams and ewes) underscores its importance to the herd. FWP acknowledges that the BNF is mandated to manage the forest for the benefit of multiple user groups in addition to wildlife; thus while any increase in motor vehicle traffic is likely to increase disturbance to wildlife, of the three proposed loops, we recommend only that the Took Loop be eliminated from the transportation plan.

## Wildlife Habitat

Aside from FWP's Took Loop trail concern, we believe the overall results of this project would be long-term improvements to wildlife habitat. Decades-long fire suppression activities have resulted in dense, overgrown stands that provide poor forage for ungulates and early-succession wildlife species, in addition to increasing the risk of catastrophic wildfires and large-scale bark beetle and disease outbreaks. Conifer encroachment has reduced the acreage of vital open meadow habitats important for many ungulates, particularly elk, mule deer, and bighorn sheep.

Maintaining a mosaic of habitat types and successional stages (including those created by periodic stand-replacing fires common in lodgepole pine systems, mimicked by regeneration harvest treatments) is key to a diverse wildlife community. FWP believes the planned forest health activities, utilizing a combination of commercial and non-commercial treatments and prescribed burning, would restore meadows and large-diameter ponderosa pine/open understory forests while maintaining denser stands where ecologically appropriate.

## Project-Specific Forest Plan Amendment

Regarding the project-specific forest plan amendment for Elk Habitat Effectiveness (EHE) standards, FWP recognizes that neither current conditions nor proposed activities meet these standards. We believe the wildlife staff of the BNF has adequately addressed the issue (Appendix D). Currently, the project area does not support a high elk population, likely due to a variety of factors including road density and poor forage quality. The proposed vegetation treatments should result in significant improvements to the latter, while proposed reductions in road density, though insufficient to meet the standard, would also benefit elk.

The Wildlife Effects Analysis Report (Supporting, Project File, Wildlife, WILD-001, page 35) states, "Security habitat in the form of forested elk security and other security areas > ½ mile from an open road and greater than 250 acres are well distributed throughout the analysis area." FWP recommends these security areas be maintained across the landscape where feasible. Additionally, citing Cook et al. 1998<sup>1</sup> (page 36), the report states, "providing thermal cover is not a suitable solution for inadequate forage conditions".

## Recreation

Through the administration of FWP's OHV grant program we have helped to fund motorized trail maintenance within the Bitterroot National Forest since 2018. We also believe that the long-term objectives of this project would help to support the growing year-round recreational use of the BNF. While our Recreational Trails Program has not funded a project in the scoping area since at least 2017, we have funded winter ski and snowmobile grooming projects within the surrounding area. Looking ahead, FWP welcomes the chance to continue discussing plans with BNF staff as you address recreational use monitoring efforts, including working on the Forest Plan Revision process.

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<sup>1</sup> Cook, J. G., L. L. Irwin, L. D. Bryant, R. A. Riggs, and J. W. Thomas. 1998. Relations of forest cover and condition of elk: a test of the thermal cover hypothesis in summer and winter. *Wildlife Monographs* 141:1-61.

### FWP Contacts

Please feel free to contact our area staff for any needed consultation related to this proposal:

- Rebecca Mowry, area wildlife biologist (406-363-7141; [rmowry@mt.gov](mailto:rmowry@mt.gov))
- Jason Lindstrom, Bitterroot fisheries biologist (406-363-7169, [jason.lindstrom@mt.gov](mailto:jason.lindstrom@mt.gov))
- Loren Flynn, regional parks manager (406-542-5517, [lflynn2@mt.gov](mailto:lflynn2@mt.gov))

Again, FWP appreciates the opportunity to comment on the Mud Creek Project and looks forward to working with BNF staff on its implementation and monitoring.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Arnold".

Randy Arnold  
Regional Supervisor

RA/sr