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Comments: Montana Backcountry Hunters and Anglers has significant interest in the Mud Cr project as well as the proposal to amend elk security guidance. We wish to be notified of any opportunity to participate throughout the process.

While we appreciate the interest in fire reduction near private land, we also appreciate that fire science is clear that the most effective strategy is to begin with the structures and work outward (Finney, et al). Work beyond a few hundred feet has significantly reduced effectiveness, and can have adverse effects to wildlife resources.

Despite recognizing that past USFS fire suppression has led to current fuel loads and unhealthy stands, the USFS still takes a suppression first approach to wildfire. We would suggest this project be expanded to address wildfire opportunities to restore ecosystem health within the roadless and WSAs adjacent to the Mud Creek project area.

As former chief of USFS Bosworth wisely stated " It is what you leave and not what you take that is most important". Our interests in the project are premised on the basis of improving ecosystem health, as well as managing the project area as productive and secure habitat for big game as well as other species.

We recently had an opportunity to see fire prevention thinning adjacent to private land in the Overwhich drainage. The remaining stand of ponderosa pine has no understory remaining and no large woody debris on the ground. It is currently all piled to be burned. As a result of such thinning there is little vegetation nor cover for many indigenous wildlife species. This apparent single function thinning could be modified with clearings favorable to regeneration patches, as well as leaving some large woody debris material on the ground for nutrient recycling and small mammals. Such modification could still improve fire resilience and private land protection while providing healthy wildlife habitat as well.

The District transportation network in the past seems to favor leaving the majority of timber roads open to ATVs but many are closed to full sized vehicles. And some roads are open until October 15, yet there are 44,000 licensed bowhunters beginning to disturb big game on Sept 1 or thereabouts. The current situation on much of the District (and likely in the project area) is contributing to motorized use in excess of current science related to big game disturbance and displacement. A series of papers by Wisdom, et al on Starkey Experiment Station can be used to update your road strategy in the project area.

Regarding the proposed changes to the elk security/habitat effectiveness on the Forest, we would suggest you consult with the best elk scientists and most recent peer reviewed literature regarding what science would justify modifying the current elk effectiveness standards. To our knowledge the most recent science has reinforced Lyons findings how motorized use and cover reduction affects elk habitat effectiveness. With more hunters with more motorized machines in the Forests, displacement of elk to private land sanctuaries is a statewide issue. Displacement to private land certainly has happened to some herds on the Bitterroot. Dr Jack Lyons effectiveness model has withstood scrutiny by other Montana Forests attempting to circumvent the standard developed in the 1980s era plans.

These issues and others related to wildlife and ecosystem health should be considered necessary foundations for both the Mud Creek project and elk Forest-wide programmatic amendment.

Thank you for the opportunity to comment and keep us abreast as these topics move forward.

Greg Munther, Conservation Director

Montana Chapter of Backcountry Hunters and Anglers