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Comments: Bitterrooters for Planning (BFP) is a local 501(c3) non-profit organization with approximately 400 members formed in 1996 to address the potentially significant adverse impacts and effects of human land use development projects on existing neighborhoods, communities and natural resources, especially water and wildlife. Much of our past engagement with public policy has focused on impacts from residential and commercial development of private lands, but as human population and consumption of resources from our living landscapes has increased, we have had to expand our focus to include public lands, recognizing that stewardship of water and wildlife resources for future generations requires partnership efforts of private and public entities.

Recognition of this need for partnership efforts is based on acknowledging that the impacts of human activity on wildlife, particularly elk, are not isolated as to whether the activity is on public or private land. Where different age classes of bulls and cows are distributed throughout an annual cycle to meet their life history needs requires an integrated approach by public and private entities to understand and provide for the mosaic of habitat components found on the mix of private and public lands that different herds need at varying times. BFP supports the active collaboration of the BNF with the Montana Department of Fish, Wildlife and Parks on this and other proposals affecting wildlife resources. However, we must strongly emphasize our concern that the BNF is taking a potentially harmful piece-meal approach to updating the Forest Plan of 1987 with this amendment proposal, rather than fully embracing the unarguable need to completely update the entire plan with an integrated approach to stewardship of all species, and one that recognizes the interaction of land use on both public and private lands.

Along with changes in scientific methods over the past three decades, the Bitterroot watershed has experienced a great deal of change that, collectively, calls for prioritizing a full forest plan update, rather than a series of disjunct amendments. Climate change was not appreciably recognized in 1987 and since then, thousands of acres have burned across the forest resulting in both positive and negative changes on elk habitat components, depending on what type of fire and where and when the fire burned. There are ever-increasing numbers of people visiting and recreating differently on the forest than in 1987, with more use from motorized vehicles, mountain bikes, floaters, rock climbers, geo-cachers, trail runners, hunters, anglers, traditional hikers, wildlife-watchers, and irrigators; all desiring more access to and uses of national forest lands. These increased uses have intensified the political conflict over the management and final dedicated land use of the Wilderness Study Areas. Predation dynamics have also changed dramatically since 1987 with the reintroduction of wolves and the recovery of grizzly bears and other predators. The Bitterroot is home to a rich fauna which includes several endangered and threatened species and species of special concern. It is unclear how species such as fisher, lynx and wolverine (some estimate the population in the U.S. outside of Alaska at just 300 individuals) for example, will be affected by changing just the Elk Habitat Standards.

Of particular importance to BFP, Ravalli County had the highest population growth rate in Montana in the 1990's, and had more houses built in the Wildland Urban Interface (WUI) over a ten year period than all the rest of the forested counties in western Montana combined, with little to no input from the BNF on potentially significant adverse impacts from this development on forest resources, especially regarding wildlife resources. Without a county growth policy and with the increasing recognition of the long-term importance of migration and travel corridors to wildlife, it is imperative that the BNF reprioritize its projects, give the full forest plan update first priority, and pursue changing the elk habitat objectives as part of a full forest plan update.

If the BNF continues with this specific proposed forest plan amendment to only change elk habitat objectives, BFP has several concerns. Our understanding of the basis of this proposal is to change the Elk Habitat

Standards to utilize new analytical tools, such as remote sensing, and new data and updated research to improve habitat analysis efficiency, thereby reducing management costs, and to also place a greater importance on forage, especially on summer ranges. The proposal also changes the way Elk Habitat Effectiveness would be measured, but does not specify methodology details. It also proposes standards would better reflect specific geographic areas within the forest, rather than a single standard applied across the forest, but the details of how standards would differ, and how they would be applied, are not clear.

While BFP recognizes the importance of utilizing the best available science in elk management, we encourage a holistic approach to ecosystem function that includes all species, and also acknowledges the importance of human activity on both private and public lands, such that human behavior can over-ride forage as the dominant factor influencing elk distribution and Elk Habitat Effectiveness. This may be especially true when elk are trying to utilize dwindling, fragmented, over-developed winter range with extended hunting seasons and ever-increasing associated human activity: cars, trucks, 4-wheelers, motorcycles, bicycles, snow mobiles, hikers, skiers, dogs and livestock. Although recent research may indicate that thermal cover may not be as important to elk distribution as forage in many cases, all the human activity mentioned above, occurring on both private and public land, causes elk to move when they need to conserve energy. Elk security in winter range may be the dominant factor affecting elk distribution in many areas, if not most, of the Bitterroot Forest. Habitat components that provide thermal cover, may be more important in their provision of elk security on the forest. Elk are now common on the valley floor and along the highways, where there are few natural predators or human hunters, the highest quality forage grown on prime and statewide important soils, and large tracts of land for security. Changing elk habitat standards absolutely must include criteria for elk security as a habitat component, along with road densities, with special emphasis on factors affecting access to and utilization of winter range. The Forest Plan amendment must address the holistic complexities affecting elk distribution in the broadest context possible.

We agree in utilizing the best available science to steward all resources, and we hold that this amendment should be done as part of a full forest plan update. If the BNF moves forward with this singular Elk Habitat Objective amendment, BFP cannot give its support until specific, detailed recommendations are made clear. We thank you for the opportunity to comment on this proposal, and we appreciate future opportunity for us to contribute additional substantive information.