

COUNTY OF RAVALLI



RAVALLI COUNTY COMMISSIONERS
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February 24th, 2023

Bitterroot National Forest Attn: Forest Plan Amendment
1801 N. 1st Street
Hamilton, MT 59840

RE: Forest Plan Amendment Comment

Dear Matt,

The Board of Ravalli County Commissioners (BCC) would like to thank you and the Forest Service project team for your collaborative efforts during this amendment process for the Bitterroot Forest Land Resource Management Plan (Forest Plan). We look forward to working with you on the development and implementation of the amendments.

The Ravalli County Commissioners fully support the following Forest Plan amendments:

- 1) Old Growth
- 2) Coarse Woody Debris (CWD)
- 3) Snags
- 4) Elk Habitat Effectiveness (EHE)

Ravalli County supports the proposed “programmatic” plan amendments. The current Forest Plan criteria and requirements for Old Growth, CWD, Snags and EHE are outdated and not based on the best available science. These amendments will resolve problematic language regarding snags and CWD and improve old growth forest stands.

Ravalli County is the highest fire hazard area in the state of MT according to the Montana Forest Action Plan (MFAP). Ravalli County is currently updating the Community Wildfire Protection Plan (CWPP) to address outdated information in regards to the high fire hazard threat that faces

our community. The outdated information in the current forest plan has resulted in our community losing out congressional authorities and funding for forest management despite our high fire risk. Updating the forest plan in regards to old growth, CWD, snags and EHE is critical to our community to mitigate catastrophic wildfires that have created a public health and safety threat from loss of property to hazardous air quality that is resulting in both short and long term health affects to our citizens. The economic impacts from wildfires have been seen in many of our business sectors and in local government when the valley is filled with smoke. These catastrophic wildfires have also resulted in significant impacts to the health of the ecosystems including loss of large acreages of habitat, weed infestation, water quality and quantity degradation.

Old Growth

Ravalli County supports the use of Green et. al for consistently and reliably identifying old growth acres. While we recognize all the benefits old growth stands, we also recognize that these stands are dynamic and are subject to insects, disease, mortality and wildfire and must be managed to ensure resiliency and sustainability of our old growth stands.

Coarse Woody Debris (CWD)

Ravalli County supports amending CWD requirements from the 1987 Forest Plan as it does not recognize the differences in natural variation of CWD among different forest types and habitats. The requirements for CWD in the 1987 Forest Plan is inconsistent with site-specific needs and scientific data for soil productivity, habitat and fire fuels.

Snags

The 1987 Forest Plan requires that “All snags that do not present an unacceptable safety risk will be retained”. Ravalli County supports providing sufficient snags for wildlife habitat while also allowing for the removal of excess snags where necessary to address public safety and catastrophic wildfire mitigation.

Elk Habitat Effectiveness

It has been erroneously assumed that dense canopy structure provide beneficial elk habitat. Best available science shows that forage is the critical factor for elk numbers and productivity. We believe that the science and studies clearly indicate that the short term impacts from active forest management, including thinning, prescribed burns and commercial harvest are much more beneficial than allowing forests to become overgrown, infested with disease or insects and/or catastrophically burned.

The inverse relation between overstory canopy density and forage abundance (McConnell and Smith 1970, Klinka et al. 1996) indicates an important tradeoff between providing dense forest cover and providing forage resources that affect carrying capacity (e. g., Hett et al. 1978). Although research has certainly demonstrated the importance of energy balance to animal performance, the

last 30 years of research has paid little attention to developing coarse-scale, management-level habitat models and planning procedures that address nutritional issues, and it has paid little attention to the effects of specific silvicultural systems that may influence the nutritional value of large landscapes to large herbivores. (Cook, Irwin, Bryant, Riggs, Thomas, 2004, Thermal cover needs of large ungulates)

A study published in the Journal of Wildlife Management by University of Wyoming researcher Bryan Lamont found elk tended to avoid beetle-killed areas overall, resulting in much less forest habitat. He stated “When millions of hectares of forest have been impacted by the bark beetle epidemic, this leads to a loss of habitat”.

Research shows that fire can be beneficial for promoting the growth forage for elk habitat. However, catastrophic wildfires that result in sterile or weed infested landscapes are avoided by elk. Elk will also avoid burned areas that have a significant amount of downed trees because movement is difficult forcing them to expend more energy.

Road impact on elk habitat have also been exaggerated in the past. Roads and road density has been historically used and the driving factor for effective elk habitat. Again, studies show that forage is the critical factor for elk habitat. There is no question that motorized use disturbs elk, but motorized use has been characterized as significantly more detrimental than other recreation.

While not specific to elk one study found that non-motorized activities had more evidence for negative effects than motorized activities. “Motorized activities are often expected to be more harmful to animals because of vehicle speed and noise [43], but our results suggest the opposite across a wide range of study locations and taxa”. (Larson, C.L., Reed, S.E., Merenlender, A.M., Crooks, K.R., 2016. Effects of recreation on animals revealed as widespread through a global systematic review.)

Elk sensitivity to roads can be observed by driving the major travel corridors in the valley, both Eastside Highway and Highway 93. It is rare that you can drive these highly traveled roads and not see elk near the road. Elk frequently cross these busy roads and end up as casualties to high speed collisions with vehicles. This observation reasonably leads us to believe there are influences on elk and elk habitat much greater than that of roads.

Our community is impacted in a number of different ways from elk herds moving from traditional higher elevations to year around valley bottom herd. Because much of the lower elevations where forage is of higher quantity and quality is private, elk harvest rates are lower and will result in larger elk populations in the lower elevations. Elk mortality and population will also increase in the lower elevations due to the increased quantity and quality of the forage, less predator pressure and milder climate conditions than that of the higher elevations. More elk on private lands will increase impacts on agricultural operations and conflicts between elk and humans including collisions on the highways. It would be reasonable to expect that increased elk numbers in the lower elevations would result in increased large predators at these lower elevations. Hunting conflicts will also increase as elk move away from public lands to private.

Large Elk herds have not, up until relatively recently made the valley floor their year around home. Forage quantity and quality in the lower levels of the valley are better than higher elevation national forest lands and has been so for many decades. Elk have relatively recently moved from higher more remote forest lands to more densely populated and traveled areas and it is not coincidence this change happened around the wolf reintroduction.

The entirety of the Bitterroot National Forest is not suitable elk habitat and therefore should not be managed as such. Bitterroot National Forest decision makers should be allowed to work with state and local agencies to determine if elk habitat objectives should be incorporated into a forest project. Outdated policies and science on the impacts of roads and forest management projects on elk and elk habitat should be abandoned and allow forest decision makers to adopt active management practices that promote healthy forests and provide beneficial elk habitat.

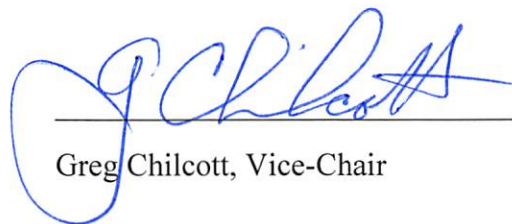
In conclusion, Ravalli County supports the amendments to the Bitterroot Forest Plan to bring significantly outdated components of the current plan up to date and based scientific data.

Sincerely,

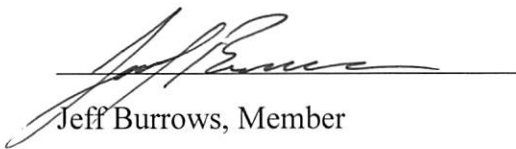
Ravalli County Board of Commissioners



Dan Huls, Chairman



Greg Chilcott, Vice-Chair



Jeff Burrows, Member