



DEC 19 2019

Ravalli County Commissioners

File Code: 1950

Date: December 18, 2019

--	--	--	--	--

Dear Interested Party,

The Bitterroot National Forest is evaluating the need to conduct a programmatic amendment for elk habitat objectives under the 1987 Forest Plan. The Bitterroot National Forest is conducting this evaluation in close coordination with biologists and managers from the Montana Fish, Wildlife and Parks. I am inviting you to provide feedback on the need for this evaluation as well as identify any relevant literature and potential issues you would like the interdisciplinary team to consider. Details on the need for this review, the comment period, and methods to comment are included.

Current forest-wide standards for Elk Habitat Objectives (Forest Plan pp. II-21, F.1.e.(14)) direct forest managers to "manage roads through the Travel Plan process to attain or maintain 50 percent or higher elk habitat effectiveness (Lyon et al. 1983) in currently roaded third order drainages. Drainages where more than 25 percent of roads are in place are considered roaded. Maintain 60 percent or higher elk habitat effectiveness in drainages where less than 25 percent of the roads have been built." Guidance in Lyon et al. (1983) indicates the elk habitat effectiveness criteria should be applied to areas greater than 3,000 acres. The Bitterroot Forest Plan applies the criteria in Lyon et al. to the third order drainage scale, regardless of size. Only 75 of 385 third order drainages on the Bitterroot National Forest are greater than 3,000 acres in size. This discrepancy between the guidance provided by Lyon et al. and the Forest Plan has created a situation where the existing condition of many third order drainages are not in compliance with the Forest Plan standard. The Forest is considering alternative metrics for elk standards because more recent scientific literature indicates that additional factors including: forage abundance, distribution, availability, and quality; distance from open roads during hunting seasons; and hunting pressure, may affect elk use patterns and distribution across the landscape. Additionally, Montana Fish Wildlife and Parks has recently concluded several research projects on elk distribution and seasonal movements within the Bitterroot Valley. The evaluation of current forest plan standards for elk is an opportune time to incorporate these research results.

The Forest Plan Record of Decision states, "Winter range will be managed to provide diversity of forage and hiding cover with at least 25 percent of the area in thermal cover at all times." Forest Plan standard F.1.e.(12) provides guidance by stating, "Big game cover/forage relationships, as described in Guides for Elk Habitat Objectives (USDA, 1978) will be a consideration in planning timber management activities." Thermal cover is difficult to accurately measure on a landscape scale and subsequent research indicates thermal cover is not a necessary requirement for elk (Cook et al. 1998).

Hiding cover is also difficult to measure at a landscape scale. Specific to Management Area 2, the Forest Plan defines hiding cover as, "Vegetation, primarily trees, capable of hiding 90 percent of an elk seen from a distance of 200 feet or less." The degree to which hiding cover may influence seasonal elk occupancy of Forest Service lands is unknown. However, the elk population in most units of the Bitterroot Valley has continued to grow since the Forest Plan was signed and is over population objective. There is a need to amend Forest Plan elk habitat management direction using scientific information that is measurable and applicable to the geography, landscape, and biology of the Bitterroot National Forest.



When proposing a Forest Plan amendment, the 2012 Planning Rule (36 CFR 219), as amended, requires the responsible official to provide in the initial notice “which substantive requirements of §§ 219. 8 through 219.11 are likely to be directly related to the amendment (§ 219.13(b)(5)) . . .” Whether a rule provision is likely to be directly related to an amendment is determined by the purpose for and the effects of the amendment, and informed by the best available scientific information, scoping, effects analysis, monitoring data or other rationale. Based on the proposed amendment and requirement of the planning rule, the following substantive requirements of the 36 CFR 219 planning regulations would likely be directly related to the proposed amendment: 36 CFR 219.10(a)(5) the consideration of habitat conditions for wildlife commonly used and enjoyed by the public. The responsible official has the discretion to determine the scope and scale of any amendment and is not required to apply any substantive requirements that are not directly related to the amendment. The amendment will be subject to the 36 CFR 219 objection process.

How to submit comments

In order for scoping comments to be reviewed and considered in a timely manner, it is most helpful if comments are received by January 17, 2020. Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record for this project and will be available for public inspection. The following options are available for submitting comments:

Electronic comments must be submitted via the project comment page: <https://cara.ecosystem-management.org/Public//CommentInput?Project=57302> (or by going to the project webpage: <https://www.fs.usda.gov/project/?project=57302> and clicking on Comment / Object on Project on right side of page).

Hardcopy comments can be mailed, hand-delivered or faxed as follows:

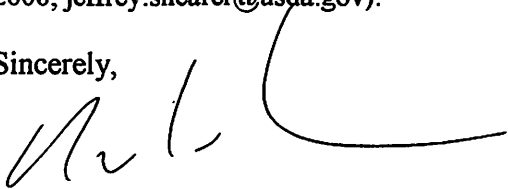
Mailed to:
Bitterroot National Forest
Attn: Forest Plan Amendment
1801 N. First Street
Hamilton, MT 59840

Hand delivered to:
Bitterroot National Forest
Front Desk
1801. N. First Street
Hamilton, MT 59840

Faxed to: (406) 363-7159. Be sure to annotate on the cover page that these are comments for the Forest Plan Amendment.

Information about the project can also be found on the Bitterroot National Forest Project webpage: <https://www.fs.usda.gov/projects/bitterroot/landmanagement/projects> or by contacting Justin Martens, Wildlife Biologist (406-821-1213; justin.martens@usda.gov) or Jeff Shearer, Project Manager (406-375-2608; jeffrey.shearer@usda.gov).

Sincerely,



MATTHEW ANDERSON
Forest Supervisor