March 21, 2025

Ethan Lula
Eureka Wildlife Biologist
Montana Fish, Wildlife and Parks
P.O. Box 431
Trego, MT 59934

Re: Ray Kuhns Wildlife Management Area Forest Habitat Improvement and Fuels Reduction Project Draft Environmental Assessment

Position: Support Alternative 2, the Proposed Project

Dear Mr. Lula,

On behalf of the Congressional Sportsmen's Foundation, please accept the following comments in support of Alternative 2 in the draft environmental assessment for the proposed Ray Kuhns Wildlife Management Area (WMA) Forest Habitat Improvement and Fuels Reduction Project.

Founded in 1989, the Congressional Sportsmen's Foundation (CSF) is the informed authority across outdoor issues and serves as the primary conduit for influencing public policy. Working with the Congressional Sportsmen's Caucus (CSC), the Governors Sportsmen's Caucus (GSC), and the National Assembly of Sportsmen's Caucuses (NASC), CSF gives a voice to hunters, anglers, recreational shooters, and trappers on Capitol Hill and throughout state capitols advocating on vital outdoor issues that are the backbone of our nation's conservation legacy.

We strongly support the proposed project on the Ray Kuhns WMA to improve forest health and wildlife habitat and reduce hazardous fuel loads. The proposed commercial and non-commercial thinning treatments and prescribed burning will address the declining forest health on the WMA, improve habitat for a range of wildlife species, and reduce the risk for severe wildfire. Broadcast burning, where feasible and appropriate following the mechanical treatments, would promote the regeneration of quaking aspen and enhance fire-adapted, early seral browse for wildlife. Without these treatments to thin overstocked stands, reduce Douglas-fir bark beetle infestation, and improve the vigor of overstory trees, winter range thermal cover for white-tailed deer will decline and severe wildfire risk will not be mitigated.

Specifically, we support the following proposed treatments:

- Unit 1 (39 acres) – Variable density thinning and group selection in the late seral, closed canopy Douglas-first and western larch stand to reduce density from an average of 160 square feet BA/acre to an average of 110 square feet BA/acre and address Douglas-fir bark beetle infestation while retaining snags and cavity trees for wildlife and maintaining overstory cover for white-tailed deer cover.

- Unit 2 (14 acres) – Variable density thinning and group selection in the late seral, closed canopy Douglas-first and western larch stand to reduce density from an average of 140 square feet BA/acre to an average of 110 square feet BA/acre and address Douglas-fir bark beetle risk while retaining snags and cavity trees for wildlife and prioritizing crown health for snow intercept and white-tailed deer thermal cover.

- Unit 3 (16 acres) – Variable density thinning and group selection in the late seral, open canopy Douglas fir, western larch, and ponderosa pine stand to reduce density from an average of 110 square feet BA/acre to an average of 90 square feet BA/acre and address Douglas-fir bark beetle risk while retaining snags and cavity trees for wildlife and retaining trees with the highest crown ratios to support winter range habitat for white-tailed deer.

- Unit 4 (47 acres) – Thin-from-below, group selection, and overstory thinning in the mid seral, closed canopy Engelmann spruce, quaking aspen, Douglas-fir, western larch, and ponderosa pine stand to promote quaking aspen growth and regeneration while retaining snags and cavity trees for wildlife.

- Unit 5 (78 acres) – Thin-from-below and overstory thinning in the mid seral, open canopy ponderosa pine and Douglas-fir stand to reduce fuel ladders and promote rough fescue bunchgrass for big game winter range forage.

- Unit 6 (105 acres) – Variable density thinning and group selection in the Douglas-fir, western larch, and ponderosa stand to reduce overstory density from an average of 180 square feet BA/acre to an average of 110 square feet BA/acre and reduce Douglas-fir bark beetle infestation while retaining snags and cavity trees for wildlife and favoring trees with dense crowns and higher crown ratios for long-term white-tailed deer winter range.

- Unit 7 (42 acres) – Thin from below and overstory thinning in the mid seral, closed canopy two-storied ponderosa and Douglas-fir stand to reduce ladder fuels and support rough fescue growth that is being outcompeted by shade-tolerant understory species.

- Unit 8 (16 acres) – Thin-from-below, group selection, and overstory thinning in the mid seral, closed canopy Douglas-fir, ponderosa pine, western larch, Engelmann spruce, and quaking aspen stand to support quaking aspen growth and regeneration for wildlife while also retaining snags and cavity trees for wildlife.

We additionally support the proposed noxious weed control treatments, road improvements, and seeding of disturbed areas with native grasses.

CSF represents the interests of Montana's sportsmen and women, the primary funders of state-based conservation efforts and significant contributors to Montana's economy, that depend on access to WMAs to pursue their outdoor pastimes. Hunters in Montana support 12,100 jobs, $334 million in salaries and wages, $47 million in state and local taxes, with a total economic effect of $1.125 billion.[1] In 2020 alone, Montana's sportsmen and women generated more than $80.83 million for conservation funding, supporting the Montana Department of Fish, Wildlife and Parks through the "user pays – public benefits" American System of Conservation Funding.

We look forward to seeing the project move forward as proposed to support forest resilience, wildlife habitat, and the outdoor sporting traditions of Montanans. Thank you for considering our comments.

Sincerely,

John Culclasure
Senior Director, Forest Policy
Congressional Sportsmen's Foundation
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[1] "Economic Impacts of Hunting and Target Shooting – Technical Report." Southwick Associates, produced for the Sportsmen's Alliance Foundation. December 2021. https://sportsmensalliance.org/wp-content/uploads/2022/02/2020-Economic-Impact-of-Hunting-and-Shooting-Technical-Report-V2.pdf