

SEP 12 2019

File Code: 1950

DATE: September 10, 2019

Ravalli County Commissioners

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Dear Interested Party:

I am seeking public comments about the proposed Piquett Creek Project on the West Fork Ranger District of the Bitterroot National Forest. The project is located five miles southwest of Conner, MT, in T1N, R21W Sections 1-3, 9-12 & 15. The project area is approximately 5,800 acres, located within the Piquett Creek and West Fork Bitterroot River-Lloyd Creek watersheds.

Adjacent to the project area are approximately 96 private structures, Triple Creek Ranch and Trapper Creek Job Corps Center. Sixty-seven percent (3,888 acres) of the project area is considered WUI, as defined by the Bitterroot Community Wildfire Protection Plan. Ninety-seven percent (5,624 acres) of the project area has been identified as Community Protection based on results of the 2016 Bitterroot Wildfire Risk Assessment. Community Protection shows areas of the Bitterroot National Forest that if a fire were to start, have a probability of reaching private land and impacting those communities or inholdings. The entire project area is within a priority landscape as designated by the Secretary of Agriculture under HFRA section 602(b).

#### Why Piquett

The Piquett Creek project was identified because existing conditions across most of the area have become departed from the desired conditions. The majority of this area is dominated by warm dry forest types (ponderosa pine, dry Douglas-fir) that historically evolved and were maintained by frequent, low intensity fire. Fire exclusion has created forest stands characterized by high stem densities, hazardous fuels build up consisting of high surface, ladder and crown fuels that are susceptible to uncharacteristic fire behavior. Dense stand conditions have stressed trees causing moderate to high susceptibility to current and future insect and disease mortality. Open habitats are experiencing a reduction in size through conifer encroachment and forage quantity and quality are decreasing from the lack of fire necessary to maintain these open areas and stimulate forbs and grasses.

With the existing conditions, wildfire burn probabilities, potential fire behavior and expected fire effects indicate habitat for sensitive, threatened and endangered species, trails, bridges and the suitable timber base on National Forest lands within this area and adjacent communities are at risk of negative effects should a wildfire occur.

#### Collaboration

We utilized a collaborative process to help develop a purpose & need and proposed action that would meet the identified goals of reducing flame lengths and crown fire potential and reduce susceptibility to current and future insect and disease activity within the Piquett Creek Project area. Over the past several months, district staff have engaged with local residents of the West Fork as well as other interested groups, organizations and local government within the Bitterroot Valley to hear ideas and develop a proposed action that would meet those goals. A summary of the collaboration efforts are listed below:

- May 13<sup>th</sup> - Existing Condition presentation to the Ravalli County Collaborative
- July 16<sup>th</sup> - Request for collaboration letter mailed to 100 adjacent landowners & local residents, Ravalli County Collaborative (RCC), Bitterroot Restoration Committee (BRC), and Trout Unlimited (TU)



- August 7<sup>th</sup>- Public field trip to the project area that included a variety of stops that highlighted different existing conditions, desired conditions and treatment options. Attended by members of the RCC, BRC, TU, West Fork Rural Fire District, local residents and business.
- August 15<sup>th</sup>- Public field trip for additional local residents.

The district received feedback and recommendations from several local residents as well as the Ravalli County Collaborative. Overall there was support and agreement that actions are needed to address the current conditions and reduce fire risk in the area. The common themes are listed below:

- Place the highest priority for treatments to reduce fuels and improve forest health within the Wildland Urban Interface.
- Design treatments that promote structural and species diversity while favoring the retention of large trees.
- Promote natural processes outside of WUI to improve stand resiliency and diversify the landscape.
- Enhance wildlife habitat and diversity across the landscape.
- Reduce the potential of losing relatively rare habitats (old-aged forests, riparian habitats and brush fields) to wildfire.
- Ensure no net gain or loss of open roads or trails within the area.
- Mitigate potential sedimentation sources into all streams from roads and trails.
- Manage the area with a high regard for aesthetics with focus on what is being left behind.
- Protect riparian habitats to promote shade, woody debris and cold water for fish and amphibians.
- Pursue stewardship projects and cost share partners to help fund treatments.
- Evaluate current and future recreational opportunities.

This information was used to develop the purpose and need and proposed actions. Although developing recreational opportunities is outside of the scope of this project, I am interested in feedback that could be used to develop future projects in the area that would promote recreation.

#### **What is the purpose and need for the project?**

Considering the recommendations received during collaboration as well as the departure between the existing and desired conditions, the purpose of the Piquett Creek project will be to:

**Improve landscape resilience to disturbances (such as fire, insects and diseases) by diversifying forest structure and composition, and reducing fuels.**

To reach that purpose, the following needs were identified:

- There is a need to reduce flame lengths and crown fire hazard potential within the Wildland-Urban Interface, adjacent community protection zone and low severity fire regimes.
- There is a need to restore fire back into the ecosystem to maintain landscape resiliency and restore natural range of variability.
- There is a need to reduce stand densities, increase age class diversity and favor shade intolerant species to promote resilience to stressors (e.g. drought, insects, and diseases).
- There is a need to improve habitat diversity, forage quality and quantity for big-horn sheep, mule deer, elk, and other regionally sensitive species.



### **Proposed Actions**

Within the Piquett Creek Project, several different activities are proposed to be implemented to meet the desired conditions and purpose and need of the project. Treatments may occur on up to 3,000 acres within the project area as long as activities comply with the established design features. Resource specific criteria was developed for the project area to assist with designing treatments that would limit negative effects and allow for flexibility in prescribing treatments. The design features also ensure compliance with Forest Plan standards, applicable laws, regulations and policies.

The existing and desired future conditions of each individual stand will dictate the silvicultural treatments that would be applied. Priority for implementation would be for areas within the WUI that are at highest risk for crown fire and/or insects and disease. Across the project area, treatments will be designed to maximize the retention of healthy large diameter trees, provide diversity in structure and composition while affecting fire behavior and insects and disease hazard at the landscape scale, not just individual stands, and improve big game habitat. Based on the existing conditions some areas may need a combination of activities to move towards the desired conditions or a single treatment may be adequate in other areas. Desired conditions and fire return intervals will be maintained into the future through the use fire (prescribed or wildfire).

#### **Activities could include:**

- Intermediate and regeneration harvests utilizing both ground based and skyline yarding, machine piling and burning, temporary road construction.
  - No harvest activities would occur within established RHCA buffers.
  - Hauling is restricted to FSR 49, 731, 5720, and 5724 and their spur roads.
  - A maximum of 500 trucks loads. Hauling will only occur on dry roads and prior to November 15<sup>th</sup>.
  - Within project watersheds, harvest would leave a residual stand and limit the increase in ECA (equivalent clearcut area) to 25%.
  - Ground-based yarding would generally be restricted to slopes 35 percent or less.
- Fuels Reduction activities such as understory thinning, hand piling, pile burning, fireline construction and understory burning.
- Road maintenance activities such as drainage maintenance, reconditioning, reconstruction.
  - No permanent road construction is proposed.
  - All temporary roads will be decommissioned no later than 3 years after the date the project is completed.
  - The resurfacing of FSR 49 with new gravel aggregate would be completed between mileposts 0.2 and 1.1. prior to hauling.
  - Drive thru dips would be installed to the approaches on two bridges that cross Piquett Creek located on FSR 49 and FSR 5720 prior to hauling.
  - All roads that cross streams will be graveled prior to any hauling.

Detailed descriptions of each potential treatment activity as well as a complete list of design features required for implementation is included in the Piquett Creek Supplement located on the project website <https://www.fs.usda.gov/project/?project=56774>.

#### **What are the next steps in the process?**

This project is being designed to be consistent with the Bitterroot Forest Plan (1987), as well as other laws policies and regulations. An interdisciplinary team is reviewing the proposal and determining whether or not extraordinary circumstances exist. They will also be providing me with final design features to address any biological, physical, or social concerns.



I believe this project meets a category of action that may be excluded from documentation in either an environmental assessment (EA) or an environmental impact statement (EIS). The project is proposed under the Wildfire Resilience Categorical Exclusion authorized under Section 605 of HFRA (16 U.S.C.6591d). This categorical exclusion may be used to carry out a hazardous fuels project in an insect and disease treatment area that was designated by the Secretary under HFRA section 602(b) by March 23, 2018. (HFRA, Section 605(c)(2)(C))

Within designated landscape scale areas, projects carried out under this authority are:

*Prioritized in the wildland-urban interface; or  
located outside the wildland-urban interface, limited to Condition Classes 2 or 3 in Fire Regime Groups I, II, or III that contain very high wildfire hazard potential.*

I believe the Piquett Creek Project meets the criteria of the wildfire resilience categorical exclusion. As previously described, the entire project area is within a 602(b) designated priority landscape. Sixty seven percent of the project area is within the Wildland Urban Interface (WUI). Ninety seven percent is within the Community Protection Zone, areas where fires that impact communities start. The WUI portion of the project area was identified as medium priority for fuel reduction work in the Bitterroot Community Wildfire Protection Plan. Ninety seven percent of the project area is within Fire Regime Groups 1-3, low severity, high frequency. Ninety five percent is in Vegetation Condition Class 2, moderately departed from historic conditions. 54% of acres are expected to exhibit crown fire behavior or exceed 4' flame lengths.

Additionally, the project proposes to treat less than 3,000 acres, construct no permanent roads, is not located within a wilderness or wilderness study area, and intends to design treatments that maximize the retention of healthy larger trees while promoting conditions that are resilient to wildfire, insects and disease.

In early 2020, I intend to work with the collaborative group and residents that helped to develop this project as well as any other interested parties to formalize an implementation plan and schedule that will specify treatment types and locations. When that draft plan is completed, the West Fork Ranger District will host an open house to receive feedback from the community on what is proposed.

#### **How to Comment and Timeframe**

This comment period provides those interested in or affected by this proposal an opportunity to make their concerns known prior to a decision being made by the Responsible Official. I am interested in any specific information you believe I should consider about this proposal; particularly any effects you think the project may have on people or the environment and reasonable design features you think might help limit those effects. I will use your specific comments to: 1) modify the proposed project, 2) determine whether there are extraordinary circumstances that would preclude me from categorically excluding the project from documentation in an EA or EIS and, 3) help decide whether or not to authorize the project.

I plan to complete the environmental review and make my decision by the end of November 2019. Therefore, I ask you to review the proposed activities and submit any comments and information you may have before October 11, 2019. It is most helpful if comments are specific to the proposed action and identify a cause-effect relationship. 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=56774> (or by going to the project webpage: <https://www.fs.usda.gov/project/?project=56774> 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:***

West Fork Ranger District  
Attn: Piquett Creek Project  
6735 West Fork Road  
Darby, MT 59829

***Hand delivered to:***

West Fork Ranger District  
Front Desk (specify comments are for Piquett Creek Project)  
6735 West Fork Road  
Darby, MT 59829

***Faxed to:*** (406) 821-1211. Be sure to annotate on the cover page that these are comments for the Piquett Creek project.

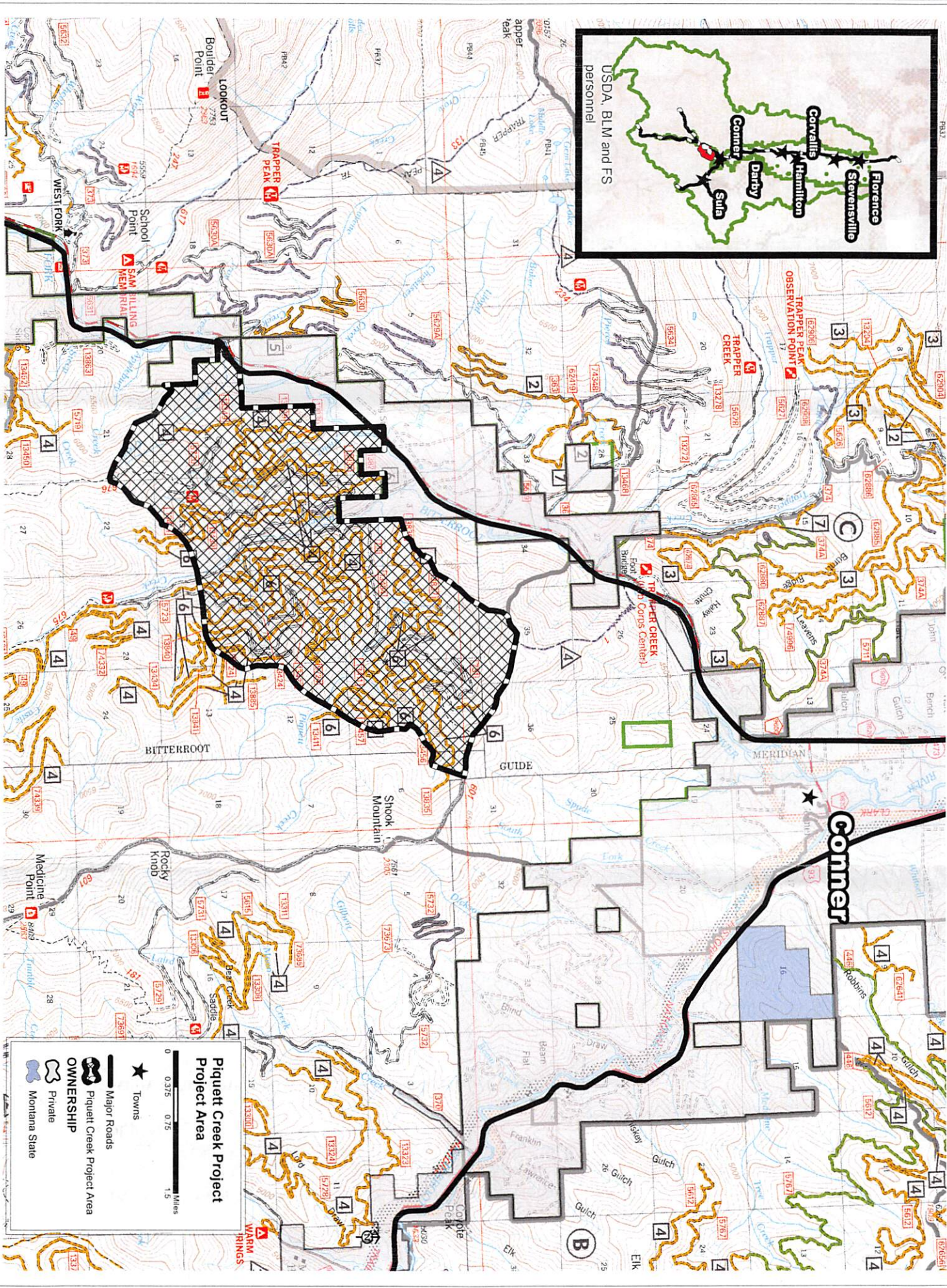
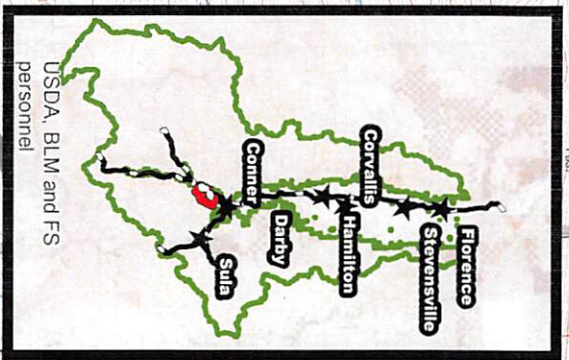
Information about the project, in addition to what is presented here, can also be found on the *Bitterroot National Forest* (click on Piquett Creek Project). (For those receiving a hardcopy, the Bitterroot National Forest Project webpage address is: <https://www.fs.usda.gov/projects/bitterroot/landmanagement/projects>

If you need additional information regarding this proposal, please contact me at (406) 821-1212, [seth.carbonari@usda.gov](mailto:seth.carbonari@usda.gov) or Project Leader, David Fox at (406) 821-1226, [david.fox@usda.gov](mailto:david.fox@usda.gov)

Sincerely,

  
SETH CARBONARI  
District Ranger





**Piquett Creek Project Area**

0 0.375 0.75 1.5 Miles

- ★ Towns
- Major Roads
- Piquett Creek Project Area
- OWNERSHIP**
- Private
- Montana State