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NOV 05 2019

File Code: 1950

Date: November 1, 2019

Beavertown County Commissioners

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Dear Interested Party,

The Darby Ranger District is proposing vegetation management activities southeast of Hamilton, MT in the headwaters of Coffee, Tenderfoot, and Fullerton Gulches within the Sapphire Mountains. Proposed treatments encompass approximately 1,300 acres in Township 5 North, Range 19 West, Sections 13, 14, 15, 21, 22, 23, and 24 (see attached map).

The area proposed for treatment consists of Forest Service lands located in management areas 2 (winter range) and 3A (partial retention). Management goals for MA 2 are to optimize elk winter range habitat using timber management practices; to emphasize access for mineral exploration and roaded dispersed recreational activities; and to provide moderate levels of visual quality, old growth habitat for other wildlife species and livestock forage. Management goals for MA 3A are to maintain partial retention visual quality objective and manage timber; to emphasize roaded dispersed recreational activities; old growth, and big game cover; and to provide moderate levels of timber, livestock forage, big game forage, and access for mineral exploration.

The Montana Department of Natural Resources and Conservation is currently proposing approximately 400 acres of vegetative treatments to address insect and disease issues in State section 16 adjacent to Forest Service lands. The Forest Service road system would be used as a haul route for removing logs harvested on State section 16. The project would be implemented through a partnership between the Forest Service and Montana Department of Natural Resources and Conservation using the Good Neighbor Authority (GNA).

Vegetation management activities on Forest Service lands would improve forest health and resilience to insects, diseases and fire. Habitat types in the proposed treatment areas are primarily a mix of warm / dry ponderosa pine and Douglas-fir. Some treatment units are stands of overly mature lodgepole pine. Most of the project area would have historically experienced frequent, low intensity wildfires characterized by low stem densities of shade-intolerant species, such as ponderosa pine. Decades of fire exclusion has allowed stem densities of shade-tolerant species to greatly increase. The high number of trees per acre has resulted in competitive stress through competition for growing space, water, nutrients, and sunlight. Tree stress is further exacerbated by moderate to severe western spruce budworm defoliation and Douglas-fir dwarf mistletoe occurring in the project area. Competitive stress and poor tree vigor provides opportunities for insects and diseases to establish and spread; and for insects such as Douglas-fir beetle and mountain pine beetle to expand their populations beyond endemic levels. This disease and insect caused mortality adds to the fuel load and makes fire suppression activities more difficult. Tree thinning reduces the competitive stress and creates forest stands that are more resilient to disturbance, such as root disease, insects, or low severity fire.

Lodgepole pine stands within the project area would have historically experienced less frequent, higher severity stand replacing fires. Similarly, years of fire exclusion from the project area has allowed these lodgepole pine stands to develop past maturity to the point that natural and insect-caused mortality is resulting in high levels of fuel build up. Additionally, mortality of the lodgepole pine overstory has resulted in increased sunlight to the ground level, allowing for increased growth of ladder fuels.



Based on the observed existing conditions described above, as well as other supporting information (e.g. national insect and disease risk maps and community wildfire protection plan), there is a need to reduce vegetative susceptibility to subsequent insect and disease activity to minimize tree mortality that would contribute to surface fuel loadings, as well as a need to maintain fuel loadings at levels that are not conducive to active, crown independent wildland fires during severe weather conditions. The objective of this project is to reduce the risk or extent of, or increase resilience to, insect or disease infestations in the project area by improving resiliency of stand structure, function and composition.

Our initial proposal is to implement vegetation treatments to improve stand resistance and resilience to disturbances. Most treatment units would use an improvement harvest to remove diseased and unnaturally high tree densities of shade-tolerant species, such as Douglas-fir, while retaining ponderosa pine trees and old growth characteristics. Our intent is to break up the homogeneous and continuous horizontal and vertical structure and create non-uniform stand structure and a diverse array of clumps and openings. Basal area following treatments would range from 40 to 80 square feet / acre. This would create sufficient space between overstory tree crowns to reduce the potential spread of crown fire, further increasing the resilience of ponderosa pine. Most units with an improvement cut would receive a follow-up treatment with a low intensity prescribed fire to remove natural fuel buildup. However, one unit is adjacent to private property and would not be treated with prescribed fire due to topography. Due to topography of the project area, a combination of ground-based and skyline yarding systems would be used. We anticipate needing to construct up to one mile of temporary road to facilitate removal of trees. The existing Forest Service road network would be used for log hauling, no additional permanent roads would be constructed. All temporary road segments would be decommissioned within three years of project completion.

Two units (one predominantly lodgepole pine, one predominantly Douglas-fir) would be treated with an even-aged regeneration harvest where all lodgepole pine and Douglas-fir would be commercially removed. We anticipate regeneration harvest in both units to be greater than 40 acres, exceeding the Regional 40-acre opening size limitation (Forest Service Manual 2470, Supplement No.: R1 2470-2016-2). To exceed this size, a 60-day public review and Regional Forester approval will be required. This scoping letter initiates the 60-day public review.

This project will be done entirely within a designated priority landscape and NEPA would be conducted using Categorical Exclusion Authorities established in the 2014 Farm Bill. Title VI of the Healthy Forest Restoration Act (HFRA) Section 303 provides for the designation of insect and disease treatment areas to increase forest resilience to insect or disease infestations. The treatment area is mostly within the Wildland-Urban Interface (WUI). Portions of treatment units now within the WUI are within fire condition classes 2 or 3 in Fire Regime Groups I, II, or III. The 2006 Bitterroot Community Wildfire Protection Plan, developed through a collaborative process, identified much of the WUI as high priority for treatment. HFRA requires the Forest Service to facilitate collaboration among State and local governments, Indian Tribes, and participation of interested persons to encourage meaningful public participation.

We would appreciate your comments and ideas on our proposal. If you have ideas that you believe should be considered in helping us develop a final proposal that meets the purpose and need described above, please consider responding with written comments. The information you provide during this scoping period will also help determine whether there are extraordinary circumstances that would preclude categorically excluding the project from documentation in an Environmental Assessment or Environmental Impact Statement.

If you wish to comment in writing on this proposal, please address your comments to:

Bitterroot National Forest
Attn: Buckhorn GNA Project
1801 N. 1st Street
Hamilton, MT 59840.

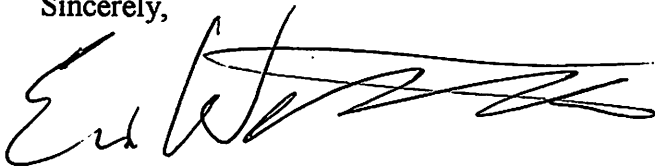
Comments should include: 1) name, address, phone number, and organization represented, if any; 2) title of project on which the comment is being submitted; and 3) specific facts and supporting information for the responsible official to consider.

Electronic comments must be submitted via the project comment page: <https://cara.ecosystem-management.org/Public//CommentInput?Project=56927> (or by going to the project webpage: <https://www.fs.usda.gov/project/?project=56927> and clicking on Comment / Object on Project on right side of page).

Comments may also be hand delivered weekdays 8:00 am - 4:30 pm at the above stated address.

Commenter names, addresses and e-mail addresses will become part of the public record. Comments must be received or postmarked by December 3, 2019. For additional information, contact Eric Winthers, 406-821-3913, at the Darby Ranger Station.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Winthers", written over a horizontal line.

ERIC WINTHERS
District Ranger

