USDA United States Department of Agriculture | Forest Service | Bitterroot National Forest | 1801 North First Street Hamilton, MT 59840

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Ravalli County Commissioners

Ravalli County Commissioners
215 S. 4th Street, Suite A
Hamilton, MT 59840

Dear Ravalli County Commissioners,

The U.S. Forest Service is proposing vegetation management and fuels reduction on National Forest System lands between Lost Horse Creek and Roaring Lion Creek on the Darby Ranger District. The proposed action includes commercial timber harvest, non-commercial thinning, piling slash, and prescribed burning on just over 2,300 acres.

The Westside Collaborative Vegetation Management Project (Westside Project) area is approximately 5,700 acres and administered by the Darby Ranger District, Bitterroot National Forest in Ravalli County (legal location: T.5N. R.21W., sections 16, 21, 27, 28, 32-33; T.4N. R.22W. sections 1, 12; and T.4N., R.21W. sections 4-8, 17, 18 PMM). Drainages within the Westside project area include Roaring Lion Creek, Judd Creek, Gold Creek, Camas Creek, Coyote Coulee, Hayes Creek, and Lost Horse Creek, all of which drain toward the Bitterroot River (please see the enclosed map). The project area also includes about 930 acres of the Selway-Bitterroot Inventoried Roadless Area (IRA).

The purpose of this letter is to share information regarding the proposed Westside Project and to gather your insights and comments about the project area, our proposed activities, and their potential effects. In this letter, I provide a brief description of project development, the need for treatment in the area, proposed activities and their preliminary effects, and how you can provide comments about the proposal.

## Project Development

### *Collaborative Efforts*

The Bitterroot National Forest believes collaboration with communities and the public is important. In addition to interacting with the general public, the Forest Service collaborates with area organizations to establish priorities, cooperate on activities, and increase public awareness and participation about site-specific projects. The initial project proposal resulted from discussions with the Bitterroot Restoration Committee (BRC), a local collaborative group. BRC members represent conservation, community, agency, business, and industry interests. They work on projects that support the application of restoration principles (www.montanarestoration.org/restoration-principles).

The BRC is interested in:

- restoring low-to-mid-elevation ponderosa pine forests to a more open, resilient condition,
- reducing the potential for wildfire, originating on National Forest, to threaten adjacent property owners
- creating opportunities for managing natural fire

On the Westside project, the BRC identified the dense forests between Roaring Lion Creek and Camas Creek as needing treatment. They reached consensus on a general approach after field trips and discussions with the Forest Service. The Forest Service agreed to consider the proposal and added it to a larger project extending farther south to Lost Horse Creek. The project was renamed Westside Collaborative Vegetation Management Project.

During the past couple years, BRC members met with individual landowners about National Forest access

possibilities. They also hosted an informal neighborhood gathering in November 2014, followed by another meeting in April 2015. The purposes of the meetings were to discuss the reasons for thinning as well as the challenges presented by steep topography, difficult access, and roadless area designation.

On July 22, 2015, the Bitterroot National Forest held an open house to provide the public the opportunity to view maps and displays, ask questions, and offer the Forest Service information about the Westside Collaborative Vegetation Management Project.

### *Healthy Forest Restoration Act/2014 Farm Bill*

Every five years, Congress passes a bundle of legislation (commonly called the "Farm Bill") that sets national agriculture, nutrition, conservation, and forestry policy. Among the provisions that pertain to the Forest Service, Section 8204 of the 2014 Farm Bill amends Title VI of the 2003 Healthy Forest Restoration Act (HFRA; 16 U.S.C. 6591). This section of the Farm Bill adds sections 602 (Designation of Treatment Areas) and 603 (Administrative Review) to address qualifying insect and disease infestations on National Forest System lands.

On May 20, 2014, Department of Agriculture Secretary Vilsack announced the designation of approximately 45.6 million acres of National Forest System lands in 35 states to address insect and disease threats that weaken forests and increase the risk of forest fire. The Governor of Montana requested designation of about 5 million acres in Montana and asked that project development in these designated landscapes were given priority. Approximately 3,731 acres of the proposed Westside project area is included in the Governor's priority landscape designation. The Bitterroot National Forest is formally requesting that the balance of the proposed project area, excluding private land, also be designated as a priority landscape for treatment.

The Westside Project is eligible for analysis under Title VI, section 602 (d) because stand conditions at this time are increasingly susceptible to mountain pine beetle infestation (USDA 2015, R1-15-11). This HFRA section provides for expedited NEPA reviews, pre-decisional objection review, and guidance on judicial review. Such designation does not change or exempt the Forest Service from complying with any other existing law, regulation, or policy such as the National Environmental Policy Act, Endangered Species Act, Clean Water Act, National Historic Preservation Act, agency Roadless Rules, and any other applicable law, regulation, and/or policy that affects the designated area.

### *Bitterroot National Forest Land and Resource Management Plans*

The Bitterroot National Forest Plan (1987) assigns Management Areas 2 (476 acres), 3a (3,870 acres), 3b, 3c (608 acres), and 5 (543 acres) to portions of the Westside project area. Management Area 3b emphasizes management of riparian areas, which are not mapped. Management Area 3b standards are applied to the riparian habitat conservation areas and delineated in the analysis. Timber harvest is compatible with the goals of each Management Area in the Westside project area within their specific standards.

The project is expected to meet Forest-wide and Management Area standards and guidelines as described in the Forest Plan. However, site-specific Forest Plan amendments may be needed for elk habitat effectiveness and scenery.

## The Need for Action

The Interdisciplinary Team considered the differences between existing and desired conditions in the Westside project area and determined there is need to:

- Improve forest resilience to natural disturbances such as fire, insects, and disease
- Reduce stand density to provide more separation between tree crowns and reduce the potential that fire would spread through the canopy in low- and mid-elevation mixed ponderosa pine/Douglas-fir forests

- Restore, maintain, and enhance wildlife and native plant habitat and diversity in riparian areas, aspen clones, and meadows
- Manage timber to provide forest products, jobs, and income that contribute to the sustainable supply of timber products from the Bitterroot National Forest
- Provide sustainable infrastructure (road access and bridge) for long-term management of the National Forest

## The Proposed Action

The proposed action was developed in response to the needs listed above. Elements of the proposed action include:

- commercial timber harvest and non-commercial thinning, including 22 acres of commercial harvest and 142 acres of non-commercial thinning in a portion of the Selway-Bitterroot IRA. Treatments in the IRA are generally adjacent to the National Forest-private land boundary
- natural regeneration
- prescribed burning
- permanent road construction, reconstruction, and maintenance
- temporary road construction
- bridge construction

The proposed project activities would improve growing conditions for long-lived ponderosa pine and Douglas-fir that are more resistant to insects and disease on these sites. They will also improve wildlife habitat conditions and contribute to the economy of local communities and counties. The areas proposed for treatment integrate multiple objectives to maximize the effectiveness of treatments and meet the project goals and objectives. Please refer to the enclosed map for location of proposed activities. Table 1 summarizes activities proposed in the Westside project area.

**Table 1: Summary of activities proposed in the Westside Project Area.**

| *Proposed Harvest and Associated Activities* | |
|---|---|
| **Vegetation Treatments** | |
| Improvement | 607 acres |
| Irregular Selection | 698 acres |
| **Total commercial harvest** | **1,305 acres** |
| Non-commercial Thinning | 666 acres |
| Plantation Thinning | 206 acres |
| Aspen enhancement | 92 acres |
| Meadow enhancement | 58 acres |
| **Total Vegetation Management** | **2,327 acres** |
| **Fuel Treatments Associated with Vegetation Treatments** | **2,030 acres** |
| **Logging Systems** | |
| Ground based | 1,086acres |
| Skyline | 219 acres |
| **Total logging systems** | **1,305 acres** |
| **Roads** | |
| Construction of permanent (system) roads | 3.5 miles |
| Construction of temporary (nonsystem) roads | 4.7 miles |
| Decommission Roads | 6 miles |

### *Vegetation Management*

Several types of vegetation treatments are proposed on about 2,300 acres (almost 41% of the project area). The treatments include commercial timber harvest and associated fuel reduction treatments, non-commercial thinning, plantation thin, meadow enhancement, and aspen enhancement (Table 2). The

proposed treatments are not intended to stop a wildfire but would slow the advance and give firefighters time to mobilize suppression efforts and provide more options for managing fires.

### *Commercial Timber Harvest and Logging Systems*

We propose to harvest timber commercially on about 1,305 acres using improvement harvest (607 acres) and irregular selection harvest (698 acres) (Table 1). Timber harvest would reduce hazardous fuels and create more diverse forest structures and resilient, sustainable, productive forests. We would remove the timber from the harvest units using both skyline and ground-based yarding systems. With skyline yarding systems, cable is stretch between two points and logs are dragged uphill, with one end suspended, to a landing. In ground-based systems, logs are brought to the landing using a rubber-tired skidder or forwarder. Logs are loaded onto trucks at the landing for transport to a mill.

#### Log Haul

Nine National Forest System roads and five county roads will be used to transport logs from the Forest to the mill. The Ravalli County roads proposed as haul routes are open, public roads that are the maintenance responsibility of the Road and Bridge Department. The Bitterroot National Forest is not proposing improvement to roads under Ravalli County jurisdiction. All haul routes under federal jurisdiction will be maintained prior to, during, and after logging operations.

#### Improvement Harvest

Improvement harvest thins the smaller trees from the understory and then trees in the overstory until the desired density (as measured by basal area) is reached. The objective of this treatment is to feature the largest diameter trees and promote fire-resilient stands by reducing the number of stems without creating enough space to regenerate the stand. Opening the forest canopy increases space between tree crowns and the distance between the forest floor and the bottom of the canopy (canopy base height). This treatment reduces the density of the forest canopy (canopy bulk density) and the ability of the forest to support a crown fire.

#### Irregular selection harvest

Irregular selection harvest would create a forest with variable density and improve structural diversity. Small openings would be created for natural regeneration of ponderosa pine. The forest between the openings would be thinned to various densities to provide varying levels of site protection and support regeneration of ponderosa pine or Douglas-fir. This treatment will initiate the development of uneven-aged forest, improve forest structure, and retain trees for future snags and coarse woody debris. Irregular selection harvest is intended to develop at least three age classes within each treatment unit. To develop staggered age classes, additional harvest and thinning entries would be needed in the next 15-20 years.

#### Retention Areas Within Harvest Units

Harvest units were delineated based on stand boundaries, logging systems, and topographic features such as roads, ridges, and drainages. The acreage in each unit is the total area within the unit boundary. However, because units include areas that cannot be harvested (steep slope inclusions, presence of surface water, sensitive plant or animal habitats, riparian areas, or other unique features), timber harvest would not occur on every acre of the unit; unharvested areas would remain in most units.

### *Fuels Treatment Associated with Timber Harvest*

Approximately 2,300 acres would be underburned, pile burned, or a combination of the two. Underburning reduces fuels related to harvest activities as well as those fuels naturally present such as grass and pine straw.

### *Reforestation*

Natural regeneration would generally occur in the created openings because ponderosa pine or Douglas-fir left in the units would provide adequate seed. We will survey irregular selection harvest units after

harvest to verify that openings are sufficiently stocked with ponderosa pine or Douglas-fir. If stocking is not sufficient, the openings would be planted with the appropriate tree species.

*Non-commercial Thinning*

We anticipate natural regeneration within the proposed harvest units in the first 10-15 years following harvest. With natural regeneration, there is the potential for high stocking levels that would induce competitive stress. Non-commercial thinning would be necessary to maintain adequate growing space for ponderosa pine.

Within the project area, there are 206 acres of plantations that need non-commercial thinning. Non-commercial thinning would retain trees 10 inches diameter-at-breast height and greater and no timber would be removed from the site. Non-commercial thinning would increase stand resilience to insect, disease, or fire disturbances in the long-term and favor shade intolerant trees. This treatment would set back changes in species composition that have occurred at the landscape level.

*Aspen Enhancement*

The presence of aspen, and the biodiversity and habitat it provides, is very important at a landscape scale and its presence should be maintained or increased. Since the fires of 2000, the amount of aspen has expanded and young aspen stands are developing (regenerating) in many areas. In this project area, we want to contribute to the aspen age and size class diversity on the landscape scale. Aspen clones regenerate after disturbance but do not regenerate under the shade of conifer forests. By removing conifers from declining aspen clones, we can reinvigorate the clone to send up new sprouts. This would ensure regeneration and promote the distribution and size of aspen clones instead of the continued decline in presence and integrity. Maintaining healthy aspen stands increases the vegetation diversity in the project area and can benefit wildlife.

*Timber Harvest Feasibility*

A timber sale feasibility analysis of alternative yarding methods (helicopter and forwarder) established that these methods are not economically, environmentally, or logistically feasible. Both systems would require construction of permanent roads and installation of a bridge, though to a lesser extent as the typical yarding systems. The reduced road costs associated with less road construction would not offset the cost of the helicopter or forwarder yarding, and the sales are predicted to be deficit by over $1,000,000 and $100,000, respectively.

*New Road Construction, Permanent and Temporary Road Construction, Bridge Construction*

To access Units 2a, 2b, and 2c, we need to construct about 3.5 miles of new National Forest System road. This road would maintain access for future management and fire suppression. New permanent roads would be used for administrative motorized access only and closed year-round to public motorized use after timber harvest and related activities are complete.

Permanent roads would be constructed where long-term, primary access is needed or terrain and other environmental features make access difficult. Permanent roads are designed and constructed to Forest Service standards, and are less expensive, both economically and environmentally, than creating a series of temporary roads and rehabilitating them after each use. Using temporary roads where long-term access is needed would cause recurrent soil disturbance at 15 to 20 year intervals.

Forest Service policy stipulates that temporary roads are not constructed to serve long-term future uses and must be closed prior to closure of the associated timber sale. The location and use of temporary roads is determined by skidding distances. About 5 miles of temporary road segments will be created in the Westside project area to access timber. Temporary roads would be rehabilitated following completion of timber harvest and associated activities.

Construction of a bridge across Camas Creek is proposed at the termination with National Forest System

Road (NFSR) 74967A. Installation of a permanent bridge is necessary for long-term access to Units 2a and 2b. We propose installing a permanent bridge because:

- The units accessed by the road and bridge will need management in the future
- Installing a temporary bridge would disturb stream banks and channels each time the abutments, spans, and decking are installed and removed (about a 15-20 year cycle). The disturbance created by installation of a temporary bridge is similar to that created by the construction of a permanent bridge.
- Since the proposed bridge is needed for long-term resource management, the costs associated with installation of multiple temporary bridges over time exceeds those of a single permanent bridge installation

A gate would be installed near the bridge to prevent motorized public use. Administrative access would be allowed for resource monitoring and management, and fire suppression.

### *Road Decommissioning*

We propose decommissioning roads no longer needed for long-term forest management. Most (4.7 miles) of the roads we would decommission are redundant roads and impassable to motorized vehicles. Redundant roads means there are other roads that access the same area. Two other roads proposed for decommissioning total 1.25 miles. NFSR 74985 is not built to Forest Service standards and has a steep, eroding grade. The other road segment is the lower 0.7 mile of NFSR 5620 that crosses and parallels Moose Creek. The Forest Service Engineer, Soil Scientist, and Hydrologist determined that this road segment contributes excessive amounts of sediment into Moose Creek. Therefore, we propose to decommission this segment of road and replace it with a new road segment in a location away from the stream. The new segment would connect the lower segment of NFSR 496 to the upper segment of NFSR 5620. The management status of NFSR 5620 would not change and the year-round , motorized, public use would continue. Decommissioning these roads would reduce erosion and sedimentation and improve water quality and fish habitat (Table 2).

**Table 2: Roads to be Decommissioned**

| Road | Location | Length (Miles) | Rationale |
|---|---|---|---|
| 62496 | Hayes Creek | 0.56 | Redundant road |
| 62947 | Hayes Creek | 1.1 | Redundant road |
| 62948 | Hayes Creek | 0.61 | Redundant road |
| 62949 | Hayes Creek | 0.33 | Redundant road |
| 62951 | Moose Creek | 0.29 | Redundant road |
| 62958 | Moose Creek | 0.59 | Redundant road |
| 62961 | Camas Creek | 0.09 | Redundant road |
| 62962 | Moose Creek | 0.36 | Redundant road |
| 74967B | Coyote Coulee | 0.51 | Redundant road |
| 74985 | Lost Horse | 0.55 | Not constructed to road standards; very steep |
| 74995 | Moose Creek | 0.27 | Redundant road |
| 5620 | Old Mine | 0.70 | The lower 0.7 miles of the road parallels Moose Creek; transmits sediment into Moose Creek |

### *Selway-Bitterroot Inventoried Roadless Area*

The 114,994-acre Selway-Bitterroot IRA borders the eastern edge of the Selway-Bitterroot Wilderness. The area located within the Westside project area totals about 927 acres. We propose to treat approximately 164 acres between Roaring Lion Creek and Gold Creek, which is about 0.14 percent of the IRA.

The proposal includes non-commercial thinning on about 142 acres with hand crews using chainsaws. The trees would be piled and burned. The proposal also includes commercial harvest of about 22 acres in

Unit 1 and yarding to the existing Roaring Lion road, NFSR 701, using a ground-based system.

These activities are consistent with the 2001 Roadless Area Conservation Rule (Roadless Rule), as they would maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects (36 CFR 294.13(b)(1)(ii)). Generally, small diameter timber would be cut and one or more roadless characteristics (36 CFR 294.11) would be maintained or improved. No roads would be constructed or reconstructed to facilitate logging.

## Preliminary Resource Effects Analyses

The preliminary effect analysis is summarized below. These effects could change with the collection of additional data and refined analysis.

### *Hydrology, Fisheries, and Aquatic Habitat*

Roaring Lion, Lost Horse, Hayes, Camas, Gold, and Judd Creeks are the fish-bearing streams in the project area. All of these streams eventually flow into the Bitterroot River. Bull trout inhabit the two largest streams, Lost Horse and Roaring Lion Creek, and the Bitterroot River. Lost Horse and the Bitterroot River are listed as bull trout critical habitat.

The Westside project would likely have negligible effects on fish habitat in Lost Horse Creek. Project activities may cause changes in sediment accumulation in tributaries, such as the Moose Creek drainage. The effect would extend over the short-term to mid-term, lasting the duration of the harvest and road decommissioning activities.

Roaring Lion Creek would not be affected. Unit 1 is the only unit in the Roaring Lion drainage is and no part of the unit is within 300 feet of the stream.

This project would have little effect, positive or negative, on fish or aquatic habitats. There is potential for small beneficial effects, and a low risk of minor negative impacts. Decommissioning the near-stream road would cause a long-term beneficial effect in the Moose Creek drainage by removing an on-going sediment source.

The project may increase sedimentation and create minor, negative effects on fish and aquatic habitat in Hayes Creek. The increase in sediment may be measureable. The negative effects would likely be caused by erosion from roads and road use, and would be limited to upper Hayes Creek. Erosion from NFSR 496 may increase during haul. This road bisects Hayes Creek and its tributaries. Erosion would be likely to return to existing levels following the period of log haul. These sedimentation effects are based on the amount of traffic and the related sediment increases that accompany increased traffic. Some of the predicted sediment increases may be offset by the improvements in road drainage efficiency. Road drainage is likely to be better after project-related road maintenance.

The proposed bridge over Camas Creek is a substantial addition to the network of road crossings of stream channels, although, the effects to fisheries and fish habitat would be expected to be minor and short-term. The proposed bridge would span the channel (without mid-channel piers) and be capable of passing 100-year floodwater and its debris. Monitoring of the Skalkaho Creek Bridge construction (milepost 4.4 of NFSR #75) demonstrated that sediment inputs from similar bridge construction may be intense for short periods (usually less than an hour), and minor for periods of days. Bank stability and erosion after one growing season is likely to approach pre-construction levels.

### *Soils*

In general, pre-existing soil conditions in units are within Region 1 Soil Standards; none of the units currently have more than 5% detrimental soil disturbance. Proposed activities including ground-based yarding, skyline yarding, landing construction, and temporary road construction will all be required to not create more than 15% cumulative detrimental soil disturbance in treatment units. Standard design features will be prescribed to ensure soil standards are met. Winter ground-based yarding will not be

required but the purchaser may choose to harvest in the winter if frozen soil/snow conditions are achieved.

There are no sensitive soils or areas of concern regarding permanent road construction in the project area. Region 1 Soil Standards do not apply to permanent forest system roads; these areas are removed from the productive land base as part of the Forest's transportation infrastructure. Subsurface water flow can be interrupted by road construction, and will be accounted for in the survey and design of the proposed permanent roads.

## *Wildlife*

### *Threatened and Endangered Wildlife Species*

There are no endangered wildlife species known to occur in the Westside project area. Canada lynx and Yellow-billed cuckoo are threatened species and may be transient in the project area. A small area of mapped lynx habitat exists in the project area but no treatments are proposed in it. The project is expected to have no effects on lynx.

The yellow-billed cuckoo is not known in Ravalli County, except as a transient species, and has not been documented within the project area. Aspen and cottonwood riparian areas in the project area do not provide sufficient habitat to support a breeding pair of cuckoos. The project would have no effect on cuckoos.

### *Region 1 Sensitive Wildlife Species*

No or minor impacts are expected on a number of sensitive species, either because there is little or no suitable habitat or the species are not known to reside in the project area. These species include bald eagles, peregrine falcons, bighorn sheep, wolverine, black-backed woodpecker, Coeur d'Alene salamander, flammulated owl, long-eared Myotis, long-legged Myotis, northern bog lemming, northern leopard frog, and Townsend's big-eared bat.

Fishers have not been documented in the project area, but have been documented in Lost Horse and Roaring Lion canyons on either side of the project area. Most of the project area is within modeled fisher habitat. The model predicts that most of the area is low-quality fisher habitat, but there are a few small areas of predicted moderate-to-high-quality fisher habitat. Proposed commercial harvest and non-commercial thinning would reduce the value of fisher habitat by opening the canopy. Leaving coarse woody debris, which is currently lacking in many areas, would mitigate some of the effects of canopy reduction.

Western toads are habitat generalists, and could occur anywhere in the project area. There are no documented western toad breeding sites in the project area, but some sites may occur in ponds, marshy areas, and flooded road ditches scattered across the project area. Riparian buffers would protect most potential breeding sites, but harvest activities and hauling could cause some mortality of toads in upland areas. Outside of the breeding season, toads prefer drier, more open sites so opening stands would likely improve habitat quality.

### *Management Indicator Species*

Pine marten, pileated woodpecker, and elk are management indicator species in the Bitterroot National Forest Plan. Pine marten have been documented in the project area, as well as in Lost Horse and Roaring Lion canyons. Most or all of the predicted fisher habitat is suitable for marten, as well as the higher elevations in the project area south of Camas Creek. Higher quality marten habitat tends to occur on cooler aspects where canopy closure and coarse woody debris are generally higher. Thinning would reduce the value of marten habitat similar to fisher habitat.

Pileated woodpeckers have been documented in the project area. The area is generally not high-quality habitat for this species because of the extensive logging that occurred in the area around 1900. The lack

of mature or over-mature forest, snags, and coarse woody debris limit pileated nesting and foraging habitats. Large cottonwood and aspen trees in some of the riparian areas may provide limited nesting habitat for this species.

Elk use is common in the project area. A Forest Plan standard requires a minimum elk habitat effectiveness (EHE) percentage of 50% in "roaded" third order drainages, and 60% in "unroaded" third order drainages. The project area contains portions of six third order drainages. The existing condition is that four of the six drainages meet the EHE standard, and two do not. Road decommissioning in the proposed action would bring one of those two drainages into compliance with the standard. The other one would remain out of compliance unless we close an additional 0.3 miles of road in the drainage. Assuming that we do not close those additional miles of roads, the project would require a site-specific Forest Plan amendment.

The Forest Plan Record of Decision stipulates that at least 25% of elk winter range be retained in thermal cover. Analysis shows that only 0.5% of the elk winter range in the project area is thermal cover. However, none of the identified thermal cover stands would be treated in the proposed action. Therefore, no site-specific Forest Plan amendment is required.

The Forest Plan does not require analysis of elk security but it gives us an additional tool to evaluate project effects on elk. Elk security area is defined as non-linear areas of hiding cover greater than 250 acres and more than ½ mile from any road or trail open to motorized vehicles during the rifle hunting season. Recommended minimum amount of security area within an elk herd unit is 30%. For the elk herd unit between Lost Horse Creek and Roaring Lion Creek, existing amount of elk security area is about 8%. A substantial amount of the lower elevation security area in this herd unit is within the project area between Coyote Coulee and Gold Creek. Harvest or thinning in Units 2a, 2b, 2c, and 18 would reduce the amount of security area by opening up horizontal sight distances. While the construction of new permanent roads to access Units 2a, 2b and 2c would not technically reduce security area because they would not be open to motorized use, it is likely that non-motorized use would increase in this area and would increase elk disturbance. The combination of loss of hiding cover and increased disturbance may push elk out of this area onto adjacent private lands.

*Species of Interest: Raptors*

The project area contains two known goshawk nest clusters that are in separate territories. Both were active in 2015. In addition, a third territory near the southern edge of the project area was active in 2003, but is not known to be active since then. Three nests in the Coyote Coulee territory are near the Coyote Coulee trail. The proposed permanent road to access Unit 2c from Blue Jay Lane would cut through the middle of this nest cluster, and may reduce or eliminate future goshawk nesting activity in this cluster. Three nests in the Ward Mountain territory are not within any unit, and the nest area around these nests would remain undisturbed.

There is one known Cooper's hawk nest near Unit 2a, and another near Unit 2b. The nest near Unit 2b appeared to be active in 2014. Neither nest is within a unit, so the nest areas around these nests would remain undisturbed.

A pair of peregrine falcons appeared to be initiating nesting activity in the cliffs above the Lost Horse quarry in 2015, but nesting was never documented. If nesting is confirmed in these cliffs in the future, seasonal restrictions on harvest activities may be necessary in Units 7d, 8, and possibly 22.

*Old Growth Habitat*

Most of the project area was essentially clearcut around 1900. Old growth surveys have not detected any stands within the project area that meet the Regional definitions of old growth habitat. Though there are some large individual trees growing in productive sites, they do not constitute old growth habitat. There is no need for a site-specific Forest Plan amendment because none of the proposed treatments would reduce old growth habitat. Treatments would generally increase leave tree growth rates, which would

help stands meet the old growth size criteria when they reach the required age.

*Aspen Habitat*

Numerous small areas scattered throughout the project area support aspen and cottonwood trees. These areas increase the vegetation diversity of the project area, and provide habitat for many wildlife species that would otherwise be absent. Many of these aspen patches are being colonized by conifers, which will eventually crowd out the aspen in the absence of disturbance. Aspen restoration treatments would remove encroaching conifers and stimulate new aspen suckers.

*Meadow Habitat*

There are a number of meadows and open grassy areas scattered across the project area. These areas also increase the vegetation diversity of the project area, and provide habitat for many wildlife species that would otherwise be absent. Many of these areas are being invaded by conifers and/or invasive weed species. Treatments to restore the open grassy areas may include slashing conifers, treating the weeds, and prescribed fire.

*Invasive Plants*

Invasive plant inventories conducted in the project area documented the presence of species on the Montana Noxious Weed List that fall into Priority 2B (abundant and widespread in MT) and Priority 3 (regulated but not formal noxious). The species are St. Johnswort, knapweed, Canada thistle, sulfur cinquefoil, and cheatgrass.

Ground-disturbing activities that expose mineral soil or remove desirable shrub or herbaceous plant species will increase the risk of colonization of the disturbed sites by new or established invasive plants. The low fire severity generated by prescribed fire operations will have a neutral-to-beneficial effect on native plant density, vigor, and composition with minimal risk of non-native invasion over the long term. Burning piles of thinning slash will expose soils to invasive plants, but will also provide a seedbed for native colonizers such as fireweed. Soil disturbance associated with road construction, road decommissioning, skid trails, and log landings will increase the opportunity for invasive plant establishment, and will require design features to treat them and revegetate the sites with native species.

Detection of any new invader species would trigger an eradication response using standard treatment tools of Integrated Weed Management.

*Rare Plants*

The project area was surveyed in 2014 and 2015 for rare plant species by the forest botanist and biological science technicians. General and intensive surveys were conducted in the project area. Montana Natural Heritage Program database, aerial photographs, spatial information, and Bitterroot National Forest records were reviewed to identify known rare plant populations in or near the proposed project area. The project area was also surveyed for habitat that might be suitable for rare plants. A Biological Evaluation will be prepared based on this information.

*Fire/Fuels and Air Quality*

Dense stands coupled with steep slopes can turn a surface fire into a crown fire. Crown fires often produce firebrands that can easily travel ¼ to ½ mile or more. This type of fire is not desirable in and near the wildland-urban interface (WUI), and all of the proposed treatments are in the WUI.

Breaking up vertical fuel continuity and creating openings in the continuous forest canopy would enhance wildfire suppression capability, and increase public and firefighter safety. Units in the IRA would enhance natural openings and increase tree spacing, which would impede fire movement down the face or across the slope. These conditions would improve management options in the event of a fire. The treatments would remove enough fuel to reduce flame lengths to less than four feet, and raise the base of the canopy to over 6 feet from the ground. Thinning trees so that canopies are 10-30 feet apart will also

reduce the potential for crown fire because crowns will no longer be touching.

In the short term, slash created by thinning could increase surface fuel loading, which would increase flame lengths until these fuels are treated (1-3 years). The Westside project would incorporate design features such as chipping, lop and scatter, whole tree yarding and/or hand piling, pile burning and broadcast burning to reduce post-harvest fuel loads.

The proposed treatments reduce fuels adjacent to the national forest-private lands boundary and the potential for crown fire and firebrand spotting. Many of the adjoining landowners have reduced fuels on their lands. In the event of a fire, the combined effects of this project with the efforts of the private landowners will improve fire management options and the abilities of initial attack crews to engage the fire. The project will also improve firefighter access to the area.

The net effect of this project would change fire behavior characteristics and intensities through fuels management. The result would be less intense surface fires, which would allow for more successful, and direct, fire suppression actions. It is likely that for many stands a follow-up treatment would be necessary within 5 to 10 years.

The project would adhere to the Clean Air Act, and all post sale fuel reduction treatments would comply with requirements of the Montana/North Idaho Smoke management guidelines.

*Selway-Bitterroot Inventoried Roadless Area*

Prescribed fire and non-commercial thin treatments in the IRA would maintain roadless characteristics because low and moderate intensity fires are typical of the forest ecosystems in the area and influence the development of the forest communities. Though the appearance of the vegetation would change, it would be within the parameters of natural integrity and apparent naturalness. In the areas that burn at low severity, visitors would see charred duff, scorched underbrush, and possibly scorched lower branches of the over story forest. The areas of moderate severity fire would have these same characteristics with the addition of individual and small groups of burned trees and areas of scorched ground. Fire scars are evident throughout the area. Fireline construction and the number of personnel on site to manage the fire would compromise the attributes of remoteness and solitude during the prescribed fire.

Commercial harvest in the Selway-Bitterroot IRA would have localized and temporary adverse effects on the IRA character. Only a minute portion (0.02%) of the IRA would be affected.

*Cultural Resources*

Several cultural sites have been identified in the Westside project area as listed below:

- segments of historic logging railroad grade associated with Anaconda Copper Mining Co. activities in the 1890s and early 1900s
- three homestead sites
- two historic wagon road grades
- two can dumps

National Register eligibility status of these sites will be determined in consultation with the Montana State Historic Preservation Office (SHPO) prior to project implementation. Eligible and unevaluated sites will be protected during implementation, by avoidance or other appropriate measures with concurrence from the Montana SHPO. Project activities in the vicinity of known sites will be monitored by the Forest's cultural resource professional. Should discovery of a cultural site occur during implementation, project activities in the area will be halted and the Forest's Heritage program manager notified. If necessary, consultation with the Montana SHPO or affected Tribes will be reopened to determine protective measures or mitigations.

*Recreation and Trails*

Coyote Coulee, Sawtooth, Ward Mountain, and Camas Creek trails are located in or adjacent to proposed

treatment units. Timber harvest and associated activities may create sights, sounds, and smells that may adversely affect users' experiences and safety. Several mitigation measures and design features are available to reduce direct effects on trails and reduce effects on users' experiences such as:

- Timing of harvest operations
- closing trails during operations
- avoiding the use of trails as landings or for piling slash
- rehabilitating disturbance of trails

*Scenery*

Proposed harvest would affect sensitive views of the project area from the Bitterroot Valley. Possible scenery effects would be greater contrast of color, line, and form than occurs in the natural-appearing landscape. Vertical striping associated with skyline harvest corridors would appear unnatural; temporary road construction would create horizontal lines; and silvicultural treatments would change the vegetation texture on the edges of treatment units. These changes would be visible from residences and Highway 93 and NFSR #496 (Lost Horse) east of the skyline treatments units. Mitigation measures specified in the Forest Plan would reduce impacts. However, it may take longer than five years to recover to a natural-appearing state. A site-specific Forest Plan amendment may be needed for specific units that would not recover within five years. Improvements in forest health and wildfire protection would justify the potential negative effects on forest scenery.

## Your Opportunity to Comment

The Westside Collaborative Vegetation Management Project will be completed using the authority of the Healthy Forests Restoration Act of 2003 (HFRA), Public Law 108-48, as amended by the 2014 Farm Bill, Section 8204. Projects authorized under the HFRA are subject to the Pre-decisional Administrative Review Process (referred to as the "objection process") pursuant to 36 CFR 218, Subparts A and C.

Objections will only be accepted from those who have submitted written comments specific to the proposed project during scoping or other public involvement opportunity where written comments are requested by the responsible official (36 CFR 218.5).

A comment form has been enclosed for your convenience but you are not required to use it. The comment form also provides the opportunity for you to choose whether you would like to have your name kept on the list to receive future mailings about the Westside Project, or to have your name removed from the mailing list for this particular project.

Written, facsimile, hand-delivered, and electronic comments will be accepted for 30 calendar days following publication of the legal notice in the *Ravalli Republic* newspaper. Comments should include:

1. Name, address, phone number, and organization represented, if any
2. Title of project on which the comments are being submitted
3. Substantive comments including specific facts and supporting information for the Forest Supervisor to consider.

Written comments must be mailed or hand-delivered to the West Fork Ranger District Office, Attention: Ryan S. Domsalla, 6735 West Fork Road, Darby, MT 59829. The office business hours for those submitting hand-delivered comments are 8:00.m. to 4:30 p.m., Monday through Friday, excluding holidays. The facsimile number is 406-821-1211

Electronic comments must be submitted in rich text format (.rtf), Word (.docx) or Word Perfect format to: comments-northern-bitterroot-west-fork@fs.fed.us. The subject line must contain the name of the project for which you are submitting comments (Westside). For electronically mailed comments, the sender should normally receive an automated electronic acknowledgement from the agency as confirmation of receipt. If the sender does not receive an automated acknowledgement of the receipt of comments, it is

the sender's responsibility to ensure timely receipt by other means.

Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record, and will be available for public inspection.

Maps and other documents are available on the Bitterroot National Forest's internet web site: http: //www.fs.usda.gov/bitterroot/. Click on NEPA Projects and select the project title from the 'Developing Proposal' list. If you have questions regarding the Westside Project, please contact Co-Team Project Leaders Chris Fox (telephone 406-777-7415, email: cfox(@fs.fed.us) or Sara Grove (telephone 406-821-1251, email: sgrove(@fs.fed.us)

Sincerely,

JULIE K. KING
Forest Supervisor

# COMMENT FORM
## WESTSIDE COLLABORATIVE VEGETATION MANAGEMENT PROJECT

Name: _____

Postal Address: _____

_____

_____

Email Address: _____

☐ *I prefer to receive information electronically at the above email address.*

Phone: _____

**My comments are:** ***(please add additional pages as needed)***

_____

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☐ **Yes, please keep my name on the list to receive future mailings regarding the Westside Collaborative Vegetation Management Project**

☐ **No, please remove my name from the mailing list for the Westside Collaborative Vegetation Management Project**

## Please return this form to:

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

Telephone: 406-821-1212
FAX: 406-821-1211
Email: cfox@fs.fed.us