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Dear Forest User,

The United States Forest Service (USFS), Custer National Forest is seeking public input and collaboration on a proposal to clean up and reduce fuels in the West Fork Rock Creek. This includes fuels downed in a November 2007 wind event and standing fuels remaining after the 2008 Cascade Fire. The West Fork clean-up and fuels reduction project proposes to improve public and firefighter safety, clean-up of wind-damaged trees, improve defensible space around structures, and reduce fuel loading on National Forest System (NFS) lands in the West Fork Rock Creek (Attached Map 1 – Vicinity Map). The West Fork Rock Creek area is approximately 2.5 miles southwest of Red Lodge, Montana. You are being contacted since you may potentially be interested in or affected by this proposal.

Purpose and Need

The purpose and need of the West Fork clean-up and fuels reduction project is to improve public and firefighter safety by 1) removing potentially hazardous burned trees along roads and near recreation sites and 2) reducing existing and future fuel loads and fuel continuity to improve fire suppression capability and firefighter and public ingress/egress. In burned areas, fuel load and fuel continuity reduction would include removing dead and dying trees to create a fuel break along West Fork Road. In unburned areas, fuel load and fuel continuity reduction would include thinning live trees and removing wind damaged standing and downed trees along West Fork Road, treating willow and aspen stands, conifer removal in elk winter range areas, and improving defensibility around buildings on the National Forest. Fuel breaks and fuel reduction would also serve the purpose of improving overall defensible space around the community of Red Lodge and associated infrastructure and residences on private and public lands. Because proposed treatments in the Cascade Fire area may not meet 1986 Custer National Forest Land and Resource Management Plan (*Forest Plan*) Visual Quality Objectives (VQO's), a project-specific Forest Plan amendment may be necessary to allow for post-fire regrowth to cover stumps and skid trails.

Project Background

A November 12, 2007 wind event with recorded gusts over 100 miles per hour created heavy concentrations of wind damaged and fallen trees across the Beartooth District. Concentrations of wind damaged and fallen trees combined with fuels conditions that existed before the wind event to create potentially hazardous fuel loads. In January 2008, the Beartooth Ranger District proposed to conduct clean-up and fuel reduction activities in the West Fork Rock Creek, Main Fork Rock Creek, and Benbow areas. Prior to completion of approval of this proposal, the 2008 Cascade Fire burned portions of the West Fork drainage with high intensity in areas damaged by the 2007 wind event. The Beartooth Ranger District recently released an Environmental Assessment and draft Finding of No Significant Impact for proposed Main Fork and Benbow area treatments.



Due to the Cascade Fire, the Forest Service has modified the proposed treatments in the West Fork and is seeking additional public comment and collaboration through this letter and other public involvement efforts.

Fire Behavior

In the past 20 years, strong winds, topography and dry fuels have resulted in rapidly spreading high-intensity fires on Custer National Forest lands in Carbon and Stillwater Counties. Examples include the 2008 Cascade fire (10,200 acres), 2006 Derby fire (200,000 acres), 2002 Red Waffle fire (2,000 acres), 2000 Willie Fire (1,503 acres), 1996 Shepherd Mountain fire (14,890 acres), and the 1988 Storm Creek (56,856 acres) and Clover/Mist fires (387,400 acres).

Events similar to the November 2007 wind event are common in Carbon County. Most of the West Fork is characterized by steep, forested, and wind-prone slopes. Narrow drainages, including the West Fork can funnel winds down slope from the plateaus and increase wind speeds. Flame length, rate of spread, and fire spotting generally increase with wind speed and often result in crown-fires in lodgepole pine forests such as the West Fork. Winds, topography, and fuel loads result in rapid wildland fire growth potential, as evidenced by the 2008 Cascade Fire.

Most historic human-caused fires on the Beartooth District occur in drainage bottoms where recreational use is more frequent, particularly in the West Fork drainage. From Memorial Day through Labor Day, average daily traffic on West Fork Road # 2071, is 115 vehicles, with peak days of 260 vehicles. From 1949 to 2007, 78% of all fires in the West Fork drainage have been human caused. The Cascade Fire is still under investigation and may or may not have been human-caused.

The Cascade Fire burned predominantly lodgepole pine forest types within the West Fork Rock Creek watershed. While the Cascade Fire reduced existing fuels in portions of the West Fork, it also created an immediate public safety concern and a long-term fuels concern. The immediate risk is that the public could be killed or injured by falling trees at developed recreation sites and on roads and trails in the fire area. There are areas along West Fork Road where low intensity ground fire has impacted the root systems of the otherwise healthy appearing lodge pole pine. These trees are either already dead or are at high risk for dying and becoming a safety hazard to the public within the next five years. Forest Service infrastructure, such as outhouses, picnic tables, and road drainage features and privately owned facilities such as lease cabins and power lines could also be damaged by falling trees. An indirect risk is that trees falling across the road could preclude access or egress to the West Fork.

The long-term fuels concern is that fire-killed trees in the Cascade fire area will fall over and lodgepole regeneration will grow in beneath and amidst the downfall. Based on the 1996 Shepard Mountain fire in the East Rosebud drainage, in 10 to 15 years, it is expected that there will be approximately 30 to 100 thousand stems per acre with fuel loads in excess of 100 tons per acre throughout the Cascade Fire area. Such extensive and continuous fuel loads and regeneration will increase potential for these areas to re-burn in the future at higher intensity and severity. In the future, an active fire in the West Fork of Rock Creek drainage could limit access for firefighting resources to prepare or defend structures. This is of particular concern given the heavy recreational use of the West Fork drainage and the number of trailheads, campgrounds, and recreation lease residences in the drainage.

Community Wildfire Protection Plans

In 2001, Red Lodge was added to the Federal government's nationwide list of communities at high risk from wildfire in the vicinity of Federal lands. The 2005 Carbon County Community Wildfire Protection Plan and Pre-Disaster Mitigation Plan (CWPP/PDM) identified the West Fork Rock Creek and Main Fork Rock Creek areas as Wildland Urban Interface (WUI), which is defined as areas within or adjacent to a community that is at-risk due to wild fire potential. The CWPP/PDM states that "The most extreme situation with respect to fuel conditions and values at risk occurs south and west of Red Lodge where there are numerous high-value individual homes and subdivisions located in the wildland urban interface area in close proximity to the National Forest boundary." This includes the West Fork of Rock Creek. The Carbon County CWPP/PDM is available online at: <http://dma.mt.gov/DES/Counties/carbon/index.asp>.

The 2008 City of Red Lodge Growth Policy states that "The City of Red Lodge is surrounded by wildland areas that contain heavy fuel loads and the potential for severe wildland fire activity. Surrounding areas of concern include the Main and West Forks of Rock Creek and the Palisades Area, all south and west of town. These areas contain significant fuel loads that could easily cause ignition within City Limits by blowing fire brands". The Growth Policy is available online at: http://www.cityofredlodge.com/gov_GrowthPolicy.asp?navID=GOV.

Recent Forest Service fuels modeling based on current vegetative condition in the nearby Main Fork Rock Creek concluded that under extreme fire conditions:

- During a 25 mph wind event, there would be an 81% probability of wildland fire ignition from a firebrand.
- If a fire gets into the crowns of trees, it could spread at nearly 2 miles per hour and start spot fires up to 0.4 miles in front of the main fire.
- With 40 mph winds, a fire could spread at nearly 3 mph, with spotting up to 0.7 miles.

The CWPP/PDM analyzed a catastrophic wildland fire scenario in the West Fork Rock Creek. The potential outcome of this scenario presented in the CWPP/PDM included:

- Potential loss of human life.
- Over 15,000 acres burned.
- Direct Cost loss estimates of over \$44 million dollars.
- Destruction of numerous assets, including 27 Recreation Residences in the West Fork, communications facilities at Grizzly Peak.
- Loss of economic viability of Red Lodge Mountain ski area and resultant major long-term impact to Carbon County's economy.

Some of the CWPP/PDM scenario was realized during the Cascade Fire. Four residences, 2 guest homes, 7 outbuildings, and 1 log access bridge were destroyed on the Custer National Forest. Due to threat of the Cascade fire burning toward Red Lodge, approximately 150 residences were evacuated. Protection of Red Lodge Mountain Ski Area was a major emphasis during the Cascade fire – the fire burned to within ¼ mile of the ski area. While no total direct loss estimate has been compiled, fire suppression costs were approximately 9 million dollars.

Values at Risk

The presence of potentially hazardous fire-killed trees in the heavily used West Fork drainage recreation corridor is a value at risk in that harm to the public and public and private property will be more likely if hazard tree removal and clean-up efforts are not completed in burned areas.

Without fuel reduction treatments, there are a number of values at risk within and adjacent to the West Fork of Rock Creek. Red Lodge Mountain Ski area, the city of Red Lodge and outlying subdivisions located at the mouth of the canyon could be impacted by wildfire. In addition to subdivisions, numerous recreation lease residences and Timbercrest Girl Scout camp are located on the West Fork drainage bottom. Forest Service infrastructure within the canyon bottom includes nine structures at West Fork of Rock Creek Work Center, horse pasture and corrals, six trailheads, Cascade campground in the upper canyon, and Basin campground in the lower. Wild Bill Lake, a day use area is also located in the lower end of the canyon. Fuel loads in conjunction with structure conditions make many structures in the proposed treatment units un-defendable and reduce fire survivability.

Another large wildland fire in the West Fork could increase runoff and sedimentation. This could potentially decrease water quality. The West Fork Rock Creek is the municipal watershed for the City of Red Lodge. Drinking water for the City of Red Lodge is pumped from a series of shallow wells with hydrologic connection to surface waters in the West Fork Rock Creek. The City also maintains facilities for surface water diversion in the event that wells do not supply adequate water. Hundreds of privately owned groundwater wells used for drinking water and ditches and wells used for irrigation purposes are also supplied by water from the West Fork. Following the Cascade fire, soil and ash were tested for metal concentrations and revealed elevated levels of naturally occurring arsenic and aluminum in burned portions of the West Fork. Monitoring of surface waters for post-fire metals in the West Fork is ongoing and initial surface water samples were within State and Federal drinking water standards. It is unknown how or if these levels will change if a large storm event results in ash and sediment entering the West Fork. Post-fire run-off and sediment could potentially affect water quality and quantity in shallow wells and irrigation ditches. Due to the Cascade Fire, there is a projected 15-20% potential increase in runoff flows until post-fire ground cover can re-establish. An additional fire anywhere in the West Fork would increase this potential, but especially fire in the headwaters.

2003 Healthy Forests Restoration Act

The 2003 Healthy Forests Restoration Act (HFRA) established special procedures for Federal agencies conducting environmental analysis for authorized hazardous-fuel-reduction projects on specific types of Federal land (available online at: <http://www.fs.fed.us/biology/wildecology/HFRA.pdf>). Except the HFRA's authorization to analyze fewer alternatives under the National Environmental Policy Act (NEPA), most HFRA procedures are consistent with normal NEPA practices. The West Fork clean-up and fuels reduction project meets HFRA requirements. Specifically, portions of the drainage were identified in the CWPP/PDM as WUI, and there are identified blow-down and post-fire treatment needs.

Custer National Forest Land and Resource Management Plan.

The *Forest Plan's* Forest-wide Fuels Management standard specifies that "A combination of treatments will be used that will most efficiently meet the fuels management direction of each management area" (USDA 1986, page 39). Each *Forest Plan* Management Area (MA) has specific goals and standards. Activities in the West Fork Rock Creek are proposed in MA F, MA M, and MA R. Goals and standards for these MAs include:

- The MA F goal is "To provide a spectrum of recreation opportunities and settings in the and around developed sites and the access corridors to the sites..." (page 61). Applicable MA F recreation standards include: "Vegetation in developed sites will be managed to maintain the appropriate recreation setting, including planting new plant to supplement existing vegetation as well as preventative measures for insect and disease control when necessary." Timber and fuels standards include that "Harvest within developed recreation sites will normally be for removal of hazardous trees and

protection of improvements” and “Planned ignitions may be used for slash and debris disposal, enhancement of visual quality and preventative measures to reduce wildfire intensity.” The Visual Quality Objective (VQO) in the foreground viewing area from a developed site or along an access corridor is Retention or Partial Retention.

- Riparian areas are designated as MA M. The *Forest Plan* MA goal for riparian areas is to provide healthy, self-perpetuating plant and water communities that will have optimum diversity and density of under-story and over-story vegetation (pages 80-82). Management standards specify that in riparian areas, prescribed fire “may be used for debris cleanup” and that “Silvicultural prescriptions will be used along fishery streams to insure that an adequate number of trees will be available to maximize the continual, natural development of pools necessary to meet the need of the individual fishery involved.” VQO is Retention or Partial Retention.
- The MA R goal is “To protect and maintain high quality water for public domestic use” (page 91). MA R standards specify that “Timber management activities, such as thinning, regeneration cutting, and selection cutting to enhance or perpetuate existing watershed, recreation and visual values or provide for public safety are permitted. Cutting activities will be managed to assure high water quality is maintained.” Other applicable standards include that “Planned ignitions may be used for hazard reduction, debris and slash disposal and maintenance of diversity for watershed values.” The VQO is Retention and Partial Retention.

Removal of burned trees may require a project-specific *Forest Plan* amendment to allow variance from Retention and Partial Retention VQO’s until post-fire regrowth covers stumps and skid trails.

For additional information and a complete listing of Goals, Standards, and Objectives, the *Forest Plan* is available online at: <http://www.fs.fed.us/r1/custer/projects/environmental/index>.

Proposed Activities

The West Fork clean-up and fuels reduction project consists of several specific proposals. Hazard tree removal is focused on providing a safe experience for the public and on protecting infrastructure, such as cabins, campgrounds, culverts, roads, and powerlines from damage due to falling trees. These proposals are not intended to prevent damage from falling trees through the entire West Fork drainage - hazard tree removal is instead focused on accessible areas that are most frequently utilized by the public. It is important to note that none of these proposals are intended to nor can completely prevent wildfires in the West Fork area. These are fire-dependent ecosystems comprised primarily of even-aged timber stands. Many of these stands are at an age when they would, under natural conditions, burn in a high severity stand-replacing wildfire. The project area has few access roads to facilitate management activities, such as widespread prescribed burning. The lack of roads, tendency for high winds, and short burning windows can make fuels treatments using prescribed broadcast burning or wildland fire use very expensive and oftentimes not physically possible.

There will be additional human-caused and lightning-caused wildfires in the West Fork. Dependent upon weather and other conditions, wildfires in these areas could grow large and suppression may not be immediately possible. Rather than attempt to treat fuels across large landscapes, proposed fuel reduction activities are focused on treatments in specific and strategic areas where such treatments would likely be most effective at improving public and firefighter safety. Fuels reduction units are connected to existing fuel breaks, such as roads, talus slopes, and other openings in vegetation. This includes using a variety of treatments to create a 200 to 300 foot wide fuel break along West Fork Road #2071. Given that a high percentage of recent fires in the area have been started due to human activities, fuels reduction is focused on the areas most used by the public, such as near roads and developed recreation facilities. When (not “if”) wildfires start in the project areas,

proposed fuels treatments are designed to improve the ability of firefighting personnel to suppress wildfires, protect infrastructure, use existing roads as fire control lines, and increase effectiveness of aerial fire retardant use. Proposed fuels treatments are also designed to improve the ability of the public to safely leave the area and to address long-term fuel loading concerns adjacent to roads in the Cascade Fire area.

Proposed activities are detailed in Table 1 and correlate with proposed unit numbers displayed on attached Maps 2 and 3. Proposed treatment types are described below.

Table 1. Proposed West Fork clean-up & fuels reduction units.

Unit number	Unit acres	Proposed treatment types
1	33	Non-commercial - Infrastructure Fire Protection
2	20	Commercial - Fire Salvage (with retention of non-commercial trees), Infrastructure Fire Protection.
3	27	Commercial - Fire Salvage, Infrastructure Fire Protection
4	19	Non-commercial - Infrastructure Fire Protection, Post-fire fuel reduction
5	13	Commercial - Fire Salvage, Infrastructure Fire Protection
6	14	Commercial Harvest - Commercial Thinning, Infrastructure Fire Protection
7	15	Commercial - Fire Salvage (with retention of non-commercial trees), and Infrastructure Fire Protection.
8	21	Non-commercial - Post-fire fuels reduction
9	19	Commercial - Fire Salvage
10	5	Non-commercial - Infrastructure Fire Protection, Post-fire fuels reduction
11	2	Commercial - Fire Salvage (with retention of non-commercial trees) and Infrastructure Fire Protection.
12	2	Commercial - Fire Salvage
13	26	Commercial - Fire Salvage, Infrastructure Fire Protection
14	6	Commercial - Commercial Thinning
15	3	Non-commercial - Post-fire fuels reduction
16	3	Commercial - Fire Salvage (with retention of non-commercial trees).
17	5	Non-commercial - Post-fire fuels reduction
18	6	Commercial - Fire Salvage
19	6	Non-commercial - Post-fire fuels reduction
20	2	Commercial - Fire Salvage (with retention of non-commercial trees).
21	2	Non-commercial - Post-fire fuels reduction
22	96	Commercial - Fire Salvage
23	2	Non-commercial - Post-fire fuels reduction
24	2	Commercial - Salvage Harvest, Clearcut, Liberation, Commercial Thinning
25	3	Commercial - Salvage Harvest, Clearcut, Liberation, Commercial Thinning
26	3	Non-commercial – Fuels Thinning and Slashing
27	2	Non-commercial – Fuels Thinning and Slashing
28	1	Non-commercial – Fuels Thinning and Slashing
29	5	Commercial - Salvage Harvest, Clearcut, Liberation, Commercial Thinning
30	17	Non-commercial – Fuels Thinning and Slashing
31	8	Non-commercial – Fuels Thinning and Slashing
32	25	Commercial - Salvage Harvest, Clearcut, Liberation, Commercial Thinning, Aspen Treatment
33	13	Commercial – Commercial Thinning, Aspen Treatment
34	9	Non-commercial – Fuels Thinning and Slashing
35	77	Commercial - Salvage Harvest, Clearcut, Liberation, Commercial thinning, Infrastructure Fire Protection, Aspen Treatment, Willow Treatment
36	3	Non-commercial – Fuels Thinning and Slashing
37	64	Non-commercial – Fuels Thinning and Slashing, Aspen Treatment
38	6	Commercial - Commercial Thinning

Unit number	Unit acres	Proposed treatment types
39	3	Commercial - Personal Use Post and Pole Harvest
40	61	Commercial - Salvage Harvest, Clearcut, Liberation, Commercial Thinning, Infrastructure Fire Protection
41	54	Commercial - Salvage Harvest, Slashing, Commercial Post and Pole
42	16	Commercial - Clearcut, Liberation, Commercial Thinning
43	51	Non-commercial – Fuels Thinning and Slashing
44	29	Commercial - Salvage Harvest, Clearcut, Liberation, Commercial Thinning
45	5	Commercial - Personnel Use Post and Pole Harvest
46	3	Non-commercial - Aspen Treatment
47	3	Non-commercial - Aspen Treatment
48	1	Non-commercial - Aspen Treatment
49	2	Non-commercial - Aspen Treatment
50	39	Non-commercial - Conifer colonization removal
51	42	Non-commercial – Fuels Thinning and Slashing, Infrastructure Fire Protection, Aspen Treatment
52	41	Non-commercial – Conifer colonization, Thinning, Aspen Treatment
Total acres	935	Commercial = 550 acres. Non-commercial = 385 acres.

Proposed treatments for individual units vary from simple single prescription treatments to more complex multiple prescription treatments. In all units, potentially hazardous burned trees that could fall on roads, recreation sites, and infrastructure would be cut and either removed or left on the ground. In all commercial units, products removed would either be manually felled with a chainsaw or mechanically felled with a tracked feller buncher. All felled trees would be whole tree yarded back to approved landings with a rubber tired skidder. These skidders would be equipped with a cable winch to remove felled trees from inoperable ground. At the landing the trees would be limbed topped and bucked into logs meeting minimum utilization requirements. Each unit would have prescribed amounts of slash remaining. This slash would either be left on the ground or a grapple type skidder would be used to haul back and spread out this material from the landing to meet the desired tons per acre of down woody material, to provide a future seed source, and/or to provide erosion prevention. Following are descriptions of treatments listed in Table 1:

Infrastructure Fire Protection: Trees and other fuels would be removed at and adjacent to buildings and other flammable infrastructure at these sites. The Montana Fire Protection Guidelines for Wildland Residential Interface Development would be utilized to guide removal of trees and other fuels at all lease cabin sites. The guidelines call for non-combustible material, such as gravel, concrete, or mineral soil in the first 3 feet around a building. Moving farther out in concentric rings, all trees and downed woody materials would be removed in the next ten feet. From 13 feet out to 30 feet, trees would be thinned to 10 feet between crowns; limbs would be pruned up to 15 feet or 1/3 the total live crown height, and surface vegetation would be maintained at 3 inches or less. All downed woody fuels would be removed. From 30 feet to 100 feet out from each building, trees would be thinned to 10 feet between crowns, limbs should be pruned to 15 feet or 1/3 total live crown height, and all woody fuels more than 3 inches in diameter should be removed. Because fire spreads quickly when moving uphill, distances for fuel reduction would be adjusted on the downslope side of buildings on slopes greater than 10%. Larger trees would be removed using logging equipment, such as feller bunchers and skidders, and sold as commercial timber. Smaller non-merchantable trees and other fuels would be either removed or piled and burned onsite. Piles would be burned under prescribed conditions under an approved burn plan.

Fire Salvage: In burned areas, all commercial timber killed by the Cascade fire or anticipated to die as a result of the fire would be removed to eliminate hazard trees and reduce future fuel hazards. Unburned trees and trees

anticipated to survive would be retained in clumps or as individuals. In most fire salvage units, the end result would be a clearcut or clearcut with reserves. In some units (see Table 1), non-commercial material would be left standing to provide visual screening and wildlife habitat.

Commercial Thinning: Ground based commercial timber harvest equipment, including skidders, feller bunchers, and forwarders, would reduce overall fuel loads by removing live and dead trees for sale as commercial timber. Approximately 80% of the commercial harvest areas would be thinned to retain overstory trees at an approximate 10 foot spacing between tree crowns. Tree spacing between remaining boles would be up to approximately 20' to 30' between tree boles. In material less than 5" DBH, bole spacing would be up 15' to 25'. Spacing between retained trees would be increased in some areas to encourage tree regeneration from seed. Non-commercial material, such as residual slash and fuels, would be piled and burned to leave \leq 10 tons per acre.

Liberation: Remaining tree overstory would be cut to liberate understory in previously harvested stands that have a fully stocked understory. Understory trees would then be thinned to an average 12' to 20' spacing between tree boles. Removal of the overstory would reduce potential for a crown fire and increase sunlight and nutrient availability for retained understory trees. Non-commercial material, such as residual slash and fuels, would be piled and burned to leave \leq 10 tons per acre.

Clearcut: All overstory trees would be removed for growth of new trees. Non-commercial material, such as residual slash and fuels, would be piled and burned to leave \leq 10 tons per acre.

Post-fire fuels reduction: To reduce long-term fuel loading, standing dead burned material would be cut either by hand or using mechanical equipment. Material would be piled and burned to leave \leq 10 tons per acre.

Salvage harvest: Windfall and wind-damaged trees would be removed. Remaining slash and non-merchantable down and damaged material would either be removed or piled and burned onsite.

Fuels Thinning and slashing: Live trees would be thinned to create a fuel break with average 10' spacing between remaining individual tree crowns and approximately 20' to 30' between remaining individual trees. In material less than 5" DBH, bole spacing would be 12' to 25'. Thinning would be accomplished by hand crews or using mechanized equipment. While cut biomass would be sold commercially where possible, the majority of these areas contain non-merchantable size timber. In machine operable ground, slash would be machine piled to leave \leq 10 tons to the acre. Any cut merchantable trees could be sold as commercial timber. In areas not machine operable, or where it would not be possible to utilize biomass for forest products: 1) Tree boles 6" and greater would be bucked to 6 foot lengths and left in place; 2) All material down to a 3" top would be handpiled; and 3) Remaining material would be bucked to lie flat on the ground.

Post and pole: Live trees less than 8" diameter would be cut and removed to leave a mix of trees at 20 to 30 foot spacing between remaining trees. Personal use units would be cut under permit by the public using chainsaws. Trees harvested under personal use permits would either be transporting material by hand or by using vehicles within 300 feet of existing roads. Commercial use units would be sold as part of a timber sale and be cut by hand and/or using small logging equipment for cutting and transport. Remaining slash and down material would be piled and burned to leave \leq 10 tons to the acre. Piles would be burned under prescribed conditions under an approved burn plan.

Aspen Treatment: To encourage aspen stand maintenance and regeneration, aspen treatments would create small patch clearcuts up to 10 acres in size within existing aspen stands and/or remove conifers within aspen stands. Prior experience with large fires on the Beartooth District has demonstrated that aspen stands generally cause crown-fires to drop to the ground. In units where aspen treatment is the only proposed activity, all work

would be accomplished by hand crews using chainsaws. All fuels would be hand-piled within these units. In units with some aspen where other treatments are prescribed, commercial logging equipment could also be used and fuels would be piled and burned to leave ≤ 10 tons to the acre.

Conifer colonization: Conifers would be removed from sage areas using chainsaws, hand piling, and pile burning to leave ≤ 10 tons to the acre of down fuels. Piles would be burned under prescribed conditions under an approved burn plan. This would reduce large fuels and continue elk winter range enhancement efforts previously completed at and near this area.

Potential Issues and Design Features:

Specific design features to reduce or mitigate environmental effects are included in this proposal. The NEPA defines mitigation to include: (a) avoiding impacts; (b) minimizing impacts by limiting the magnitude or degree; (c) rectifying the impact by repairing, rehabilitating, or restoring; and (d) reducing or eliminating impacts over time by preservation and maintenance operations during the life of the action. Table 2 lists potential design features and the concerns addressed.

Table 2. Potential Concerns and Design Features.

Potential Concerns	Design features included in proposal
Effects to recreational users.	<p>The operator would be required to reclaim or repair impacts to roads, trails, or routes.</p> <p>During the summer season, implementation would be limited to weekdays to minimize impacts and avoid higher use of the area by recreation users on the weekends unless work could occur without risk to the public. Limiting operations and log hauling to week days whenever possible would reduce impacts to adjacent land owners during evening hours and weekends. Special orders closing operating areas to the public Monday – Friday during project activities would be implemented for public safety when necessary.</p> <p>For implementation during the winter use season from December 1st to April 15th, the West Fork of Rock Creek would be maintained to the end of the area where work is occurring to provide weekend access for winter recreation users from that point on up the road. A mitigation measure for loss of winter trail grooming would be to temporarily permit winter trail grooming in the Main Fork of Rock Creek during project implementation in the West Fork of Rock Creek.</p> <p>In units 35, 37, 41, and 44, trees would be removed along Silver Run National Recreation Trail #102 and #102A, cross country ski trail loops, and Silver Run Road # 2006 so as to better accommodate future cross-country ski trail grooming.</p>
Effects to water quality.	<p>Comply with State of Montana Streamside Management Zone (SMZ) requirements (available online at http://data.opi.state.mt.us/bills/mca_toc/77_5_3.htm). In order to meet SMZ retention requirements within the fire area where West Fork Road #2071 is within the SMZ:</p> <ul style="list-style-type: none"> • All trees leaning towards the stream would be retained, • Only hazard trees within one tree length leaning towards the road would be removed, • Dead non-commercial material would be lopped and scattered, and

Potential Concerns	Design features included in proposal
Effects to water quality.	<ul style="list-style-type: none"> • Where less than 10 trees per 100 linear feet remain standing within SMZ's, an alternative practice will be applied for through MTDNRC. <p>In units 02, 03, 09, 13 and 22:</p> <ul style="list-style-type: none"> • No treatment would occur in SMZs. • Treatment in areas adjacent to SMZs would occur only under frozen or dry conditions. • All skid trails upslope of SMZs would be heavily slashed or mulched to roads/landings in lieu of constructing waterbars. <p>The following would be applied for treatments within all other units:</p> <ul style="list-style-type: none"> • No treatment would occur in SMZs. • All skid trails upslope of SMZ to roads/landings would be covered with slash or mulch in lieu of constructing waterbars, unless surface is >50% rock. • Any excess tops not used for slashing skid trails would be left within treatment units for 50' upslope from SMZ, unless surface is >50% rock. <p>Log landings would be located on uphill side of roads where feasible. All landings would be placed on high ground versus swales or flow concentration points. Locations with high surface rock content downslope would be favored. Site reclamation and monitoring at log-landings and burn pile locations would be required.</p> <p>If fuel treatments involve mechanical equipment operation adjacent to SMZs and winter operations do not occur over snow, there would be no equipment operations in SMZs and equipment operation elsewhere only under dry conditions. All major equipment tracks would be slashed upslope of SMZ in fuel treatment units.</p> <p>Apply State of Montana Best Management Practices for Forestry (available online at http://dnrc.mt.gov/forestry/Assistance/Practices/Documents/2001WaterQualityBMPGuide.pdf).</p> <p>Fuel and equipment storage standards and a spill containment and reporting plan would be required for mechanized equipment use.</p>
Effects to air quality	Pile burning would be conducted under an approved burn plan in compliance with State air quality requirements.
Effects to wildlife and sensitive plants.	Timing and operating restrictions would be applied to reduce or eliminate effects. Fuel reduction locations/operations would be identified and adjusted as needed. This could include application of site-specific snag and down woody debris retention standards.
Effects to archaeological resources.	Treatment areas would be inventoried prior to any ground disturbance and locations/operations would be adjusted to ensure no impacts occur.
Effects to Inventoried Roadless Areas	While portions of proposed hazard tree removal and fuel reduction treatments are in Inventoried Roadless Areas, proposed treatments would occur near and adjacent to existing roads and facilities. No new permanent roads or facilities would be constructed.
Effects to	Treatments would be varied in high-visibility areas, such as areas adjacent to roads, campgrounds and other recreation sites.

Potential Concerns	Design features included in proposal
visual resources.	<p>Feather edges of fuel reduction areas to meet partial retention VQO requirements.</p> <p>Stumps would be flush cut in high visibility areas.</p> <p>Where available, some isolated unburned trees would be retained between and near lease cabins and campground campsites to provide screening, shade, and privacy.</p> <p>Where possible, outer unit boundaries would be tied to natural landform and vegetation edges.</p>
Effects to soil quality and site productivity.	<p>Timber harvest equipment operation areas, such as corridors, skid trails, and log landings, would be located in a manner that minimizes disturbance and impact to the ground.</p> <p>Timber harvest equipment would be operated only when soils are dry, frozen, or covered with snow.</p> <p>If log landings are constructed, top soil material would be salvaged, stockpiled and replaced at the end of the project. These areas would be scarified and mulched at the completion of the project.</p> <p>If logging over snow is not an option, equipment operations on and cable corridors in burned soils would be mulched with fine organic material and larger coarse woody debris (3 inches and greater) would also be placed on top of the fine organic mulch. The mulch could be straw mulch or wood mulch from local chipped non-merchantable material. The large material would act as an anchor for the fine material.</p>
Noxious weed spread.	<p>All project equipment would be washed and inspected of for noxious weed seed.</p> <p>Treatment units would be designed to minimize ground disturbance. Areas of ground disturbance would be restored and revegetated.</p> <p>Site reclamation and monitoring would occur, with appropriate follow-up treatment of any noxious weeds.</p>
Provide forest products to local communities.	<p>Burn piles would be made available to firewood, post and pole, and bough harvest.</p> <p>Some post and pole harvest areas would be designated for personal use.</p>

Opportunities for Public Input

To identify potential public concerns and environmental effects resulting from this proposal, the Custer National Forest is conducting additional public comment and collaboration. In accordance with NEPA, potential environmental impacts will be considered, analyzed, and disclosed before a decision is made regarding project implementation. This request for comment and input is an attempt to collaboratively involve the public and other agencies in identifying concerns and issues associated with proposed activities.

The USFS is interested in issues or concerns you may have with the West Fork clean-up and fuels reduction project. Comments should display points of dispute or debate relevant to proposed activities. Please list

specific units or geographic areas where you have concerns. Issues identified from public comment may be used to change project design features and/or prescribe additional mitigations. Issues and concerns will also be utilized to determine the appropriate level of environmental analysis and documentation required by NEPA.

Written, facsimile, hand-delivered, oral, and electronic comments will be accepted during the scoping comment period until December 6, 2008. This is an authorized HFRA project, and as such will be subject to a pre-decisional objection period before the Responsible Official makes a decision. As an authorized HFRA project, this scoping period is an opportunity for public comment. Individuals and organizations must submit specific written comment related to proposed hazardous fuel reduction projects during the scoping period and/or other public comment efforts to be eligible to file an objection. Information about 36 CFR 218 pre-decisional administrative review procedures is available online at:

http://www.access.gpo.gov/nara/cfr/waisidx_07/36cfr218_07.html.

The HFRA requires Federal agencies to provide notice of the project and conduct a public meeting when preparing authorized hazardous-fuel-reduction projects. A public collaboration meeting specific to this project will be held in Red Lodge at the Red Lodge City Hall at 1 South Platt from 5:30 to 7:30 pm on December 3, 2008. The meeting will consist of an approximately one-half hour informational presentation followed by an open-house opportunity for individuals to ask questions, discuss project concerns, and/or provide comment to agency representatives. All interested parties are encouraged to attend.

Please contact the Beartooth Ranger District if you would like to continue to receive information about the West Fork clean-up and fuels reduction project. Your name will be removed from the mailing list for this project if you do not provide comment or specifically request to remain on the list. You may submit written, hand-delivered, or oral comments. Office business hours for those submitting hand-delivered or oral comments are 8:00 AM to 4:30 PM, Monday through Friday, excluding holidays. For further information, to provide comment, or to remain on the project mailing list, please contact:

Dan Seifert
Beartooth Ranger District
6811 US Highway 212 South
Red Lodge, MT, 59068
Phone: (406) 446-2103
Fax: (406) 446-3918
E-mail: comments-northern-custer-beartooth@fs.fed.us

If you choose to comment via e-mail, please include "West Fork" in the e-mail subject line. 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.

Please provide comment and/or input addressing this proposal by December 6, 2008.

Sincerely,



TRAUTE PARRIE
District Ranger

Attachments