

Helena National Forest
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For more information,
visit the Helena National
Forest website at
[www.fs.fed.us/r1/helena/
projects/hazard_tree](http://www.fs.fed.us/r1/helena/projects/hazard_tree)

“Caring for the land and
serving people.”



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What Comes Next?

It is anticipated hazard tree reduction projects would begin as early as spring/summer of 2009. The Helena National Forest Supervisor, Kevin Riordan, is the Responsible Official for this project. The Forest Service will prepare an Environmental Assessment (EA) to analyze and disclose the environmental effects of the Hazard Tree Reduction proposal. As previously mentioned, the proposal is an “authorized project” under the Healthy Forests Restoration Act (HFRA), Title I, Sec. 102(a)(4). Therefore, expedited procedures under this Act will be used to complete project planning and decision-making.

The Forest Service will prepare a decision that will disclose the environmental effects of this proposal as described in this scoping letter or if modified; the effects of the No Action alternative; the rationale for the decision; design criteria and monitoring requirements necessary for project implementation.

Instead of an appeal period, there will be an objection process *before* the final decision is made and after the environmental document is mailed (reference 36 CFR 218). In order to be eligible to file an objection to the preferred alternative, specific written comments related to the project must be submitted during scoping (218.5). Individual members of organizations must have submitted their own comments to meet the requirements of eligibility as an individual, objections received on behalf of an organization are considered as those of the organization only. Names and addresses of those who comment and/or file objections will become part of the public record. For more information on how this objection process works and the requirements, please contact the Helena National Forest or you may read the regulations under 36 CFR 218 Subpart A on the web site at <http://www.fs.fed.us/emc/appl/36cfr218a.htm>.

HFRA projects are expedited because they are exempt from the appeal process set forth in 36 CFR 215; the appeal process generally takes 105 days to work through. Instead, HFRA projects are subject to a pre-decisional administrative review and objection process under 36 CFR 218, Subpart A. This process generally takes 60 days; 30 days to allow for filing of an objection and 30 days for the Forest Service to respond, in writing, to the objection. More detailed information related to the objection process will be provided when the *Forest-wide Hazard Tree Reduction EA* is available for public review.

Join Us!

In development and preparation of the project, the participation of interested persons, state and local governments, and Indian tribes is encouraged at this time and throughout the process.

Please join us at any of the upcoming open houses.

Elliston, MT: December 2, 4:00 pm to 7:00 pm @ Elliston School

Marysville: December 3, 4:00 pm to 7:00 pm @ Marysville School

Helena: December 1, 4:00 pm to 7:00 pm @ Ranger District Office

Lincoln: December 4, 4:00 pm to 7:00 pm @ Ranger District Office

Townsend: December 4, 4:00 pm to 7:00 pm @ Ranger District Office

**November 2008
Official Comment Period
Newsletter**

How to Get Involved

The Helena National Forest is preparing an Environmental Assessment for the removal of hazardous trees. This proposal is an “authorized project” under the Healthy Forests Restoration Act (HFRA), Title I, Sec. 102(a)(4) (“...existence of an epidemic of disease or insects...”).

Section 104 of the HFRA provides expedited procedures to complete project planning and decision-making, as consistent with Helena National Forest Plan direction or covered by plan amendment. HFRA projects are expedited because they are exempt from the appeal provisions set forth in 36 CFR 215; instead, they are subject to a pre-decisional administrative review and objection process under 36 CFR 218, subpart A.

This Scoping period (40 CFR 1501.7) represents the only opportunity for the public to comment on this proposal prior to the objection process. Only those individuals and organizations who submit specific written comments related to the Proposed Action will be eligible to file an objection (36 CFR 218.6). 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.

A legal notice was published in the *Helena Independent Record* on November 18 2008, therefore, the comment period will end December 19, 2008.

Comments may be submitted by email in word (.doc), rich text format (.rtf), text (.txt), and hypertext markup language (.html) to comments-northern-helena@fs.fed.us

Submit comments to:

Sharon Scott
Helena National Forest
2880 Skyway Drive
Helena, MT 59602
(406) 449-5490 phone
(406) 449-5436 fax

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



Why Hazardous Tree Removal?

The continued development of the mountain pine beetle epidemic on the Helena National Forest has resulted in high levels of tree mortality that have created a hazardous condition for public safety due to the potential for dead and dying trees to fall. The purpose of this proposal is to reduce the public safety hazard over the next three years by removing hazard trees and hazardous fuels along 750 miles (Table 1 & maps) of heavily traveled open system roads, in 6 campgrounds (Moose Creek - Lincoln, Pine Grove, Skidway, Gypsy Lake, Moose Creek – Helena, and Kading), and 11 administrative sites (Tenmile Picnic Area, Charter Oak Mine, Kading Cabin, Prickley Pear Sportsman’s Range, Cummings Cabin, Lincoln Cemetery, Old Lincoln Townsite, Thompson Guard Station, Hidden Lakes Trailhead, Edith Lake Trailhead, Stove Camp Trailhead) in a cost efficient, controlled, and orderly manner. The project is needed to: ensure public and firefighter safety by keeping travel corridors open with adequate clearance for traditional firefighting equipment and traffic; reduce the hazard to public safety due to the risk of dead and dying trees falling; reduce the risk of high intensity/high severity wildfires within treatment areas by reducing hazardous fuel loadings associated with treatments and beetle killed trees; minimize the effects of tree mortality on the overall health, scenic quality, and condition of forested areas along roads, developed recreation sites, and administrative sites; and partially offset the cost of treatments by recovering value of forest products.

Here’s What Is Proposed ...

Standing dead and dying trees would be felled and/or removed that are within 1 ½ tree heights (from 75 to 175 feet) from the edge of the road surface or within/around the boundary of the administrative site as listed in Table 1 and displayed on maps.

Areas targeted for tree removal are primarily dead trees including beetle infested lodgepole and Ponderosa pine stands and completely defoliated Douglas-fir from spruce budworm; however there may be minor amounts of other tree species that are hazardous or become hazardous after treatment and will need to be felled and/or removed. After felling, trees could be left on site, bucked to reduce fuel hazard, decked, or removed from the area. Mature and regenerating healthy, live trees that do not pose a hazard to people or property would be retained. After hazard trees are felled and/or removed, the area may resemble a thinning of the forest or a clearcut with scattered regeneration. This will depend upon the number of dead and infested hazardous trees within an area.

Slash treatments could include mulching, chipping, lopping and scattering, machine or handpiling for subsequent burning. Slash piling and burning would be done for at least 50 feet alongside the road to mitigate fuels and visual concerns.

Along any streams, Best Management Practices will be followed regarding removal of trees and operation of equipment. Those hazard trees along the streams that cannot be reached with equipment would be felled and left on site. Such sites include, but are not limited to fish bearing streams, perennial streams, and archeological sites.

Due to the need to address public safety, this work would be completed as soon as ground conditions are suitable. Roads would be closed to the public during operations, yet open evenings and weekends as per the Helena National Forest travel plan map. Priority for scheduling treatment would be determined by severity of bark beetle infestation, mortality of trees, and degree of safety hazard that is present.

More on What is Proposed...

Table 1 provides estimated total road miles. Please note that not all miles would be treated. There are large chunks of open areas with no trees, stands containing uninfested trees such as Douglas-fir and/or aspen that would not be harvested, past harvested areas with small trees, and non-federal land within the defined roadway corridor.

Other features associated with this action include:

- Site specific Best Management Practices, including sediment reduction practices would be followed.
- All heavy equipment would have an undercarriage wash, and be inspected, prior to entering national Forest System lands to reduce the spread of noxious weeds.
- Log landings would be located in noxious weed free areas, or if no weed free areas are available, the site would be treated prior to use to minimize noxious weed seed production and spread. Landings would be reseeded following harvest and slash disposal activities. Debris/rocks would be placed to deter public motorized vehicle use on landings.
- If currently unknown cultural resources are discovered during project implementation, operations affecting that discovery would be curtailed until the site is evaluated by a Forest archeologist.
- Disturbed areas would be monitored to insure soil stabilization occurs through natural revegetation from the soil seed bank. If additional plant seed is required, only native species common to the site would be used. All seed and mulch material would be certified noxious weed seed free.
- Visible stumps within 50 feet of the roads would be cut as close to the ground as possible. (8 inches or less).
- Where feasible, in more densely stocked areas where greater numbers of trees would be removed, meandering edges would be created and smaller trees would be retained.
- Some small slash piles would be left untreated to provide small mammal habitat.
- Existing roads would be used to facilitate skidding of trees.
- Multiple pass skidding trails would be designated and located by the sale administrator and should be spaced no closer than 100 feet apart.

Where frozen soil is required, frozen soil depth would be monitored immediately before the project begins by the sale administrator. A minimum of 4 inches of soil frost is recommended to be in place before allowing activity by harvesting/skidding equipment. In the event frozen soil depths do not meet the minimums, and acceptable alternative harvest practice would involve plowing snow from (or packing the snow on) skid trails and landings, permitting them to freeze. Felling and skidding would be delayed until trails and landings have frozen to the required depths.

See Table 1 for road list.

What is a Hazard Tree?

A hazard tree for this project is defined as any tree that may fail due to a structural defect and, as a result, may cause property damage or personal injury. A defective tree is hazardous only when its failure could result in damage to something of value. The following tree specific criteria will be used to identify hazardous trees for this project. Any one or more of these criteria will qualify a tree as hazardous:

1. Dead trees of any species that may cause property damage or result in personal injury
2. Trees with significant defects such as: canker rots, root rots, trunk injuries (mechanical damage, stem decay, etc.), and/or crown defects (brown or damaged branches, forked tops, dead tops, etc.)
3. Dying trees as defined as: greater than 1/3 dead limbs and branches, 40% or more foliage transparency (thin crown, off-color or dwarfed foliage), and/or bark beetle attacks obvious and abundant.

Research shows that dead, mature lodgepole pine trees begin to fall after three years and that most tree species fall within 14 years. It is anticipated that many of the dead trees on the Helena National Forest will fall across roadways, in administrative sites, and in developed recreation sites. This situation will create threats to public safety either directly or indirectly (i.e. access into or out of areas may be blocked by fallen trees) and/or will increase the potential for property damage.

Forest Plan Compliance

Forest Service Manuals and Handbooks and the Highway Safety Act of 1966 are clear that the Forest Service has a responsibility to maintain the safety of its roads, trails, and other related sites for use by the public. Forest Service Manual 7701.3 – Transportation System Management, 2. Highway Safety Act of 1966 (23 U.S.C. 402, Pub. L. 89-564) “Authorizes State and local governments and participating Federal agencies to identify and survey accident locations; to design, construct and maintain roads in accordance with safety standards; and promote pedestrian safety.” Forest Service Manual 7731.1 states, “Manage forest development roads that are not subject to the Highway Safety Act (those not suitable for passenger car traffic) so they are safe for the planned use.”



The Helena National Forest Plan guides all natural resource management activities and establishes specific management standards for management areas which are geographically mapped. The proposed actions are located in various management areas across the Forest. Management area direction will be incorporated where applicable and further discussed in the Environmental Assessment for this project.