A Request for Comments on the

Little Beaver Hazardous Fuels Reduction Project

Cabinet Ranger District
Kootenai National Forest
September 2008

Introduction

The Cabinet Ranger District is proposing the Little Beaver Hazardous Fuel Reduction Project, which would include timber harvest and related fuel reduction on 1,188 acres, and prescribed burning for fuel reduction on an additional 691 acres. Collaboration has been ongoing throughout the planning process for this project. The project area is in the County wildland urban interface as defined in the Sanders County Community Fire Protection Plan (2005). This Plan highlighted the area as a priority to treat hazardous fuels within the Thompson Falls Rural Fire District. Three notices were sent to the public about this proposed project and held two public meetings with field trips to encourage collaboration among all interested "stakeholders" during the last year. Public input and ideas were used to develop the proposed action presented here. Please review this proposal and the enclosed maps, and provide us with your comments by September 26, 2008. Near the end of this notice you will find more information about providing comments.

This project is being developed under the mandates and guidelines provided in the National Fire Plan (2000), the Healthy Forest Initiative (2002), and the Healthy Forest Restoration Act (2003) and the Kootenai National Forest Land and Resource Management Plan (Forest Plan, 1987). This project was initiated with an emphasis towards implementing the Sanders County, Montana '*Community Wildfire Protection Plan'*, which addresses uncharacteristically high forest fuel

loads with the potential of large-scale, high severity wildland fires within the wildland-urban interface and, the protection of communities in the Little Beaver Creek area. This proposed project qualifies for consideration under HFRA authority under Title 1, as it is located within the Wildland/Urban interface, as identified in the Sanders County Community Protection. The objective of this project is to reduce hazardous fuels (dead and live forest vegetation) within the wildland-urban interface to minimize the severe effects of unplanned wildland fire and to increase firefighter safety while trying to suppress wildland fires.

Projects associated with the Healthy Forest Restoration Act do not have an appeal period. Rather, 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 or other public involvement opportunities on this EA (218.6). 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. For more information on how this process works, contact the Cabinet District or you may read the regulations under 36 CFR 218 Subpart A on the national Forest Service web site at: http://www.fs.fed.us/emc/applit/36cfr218a.htm.

Project Location

The project area is located on National Forest System (NFS) lands north of Thompson Falls and southeast of Trout Creek (S31; T23N, R30W, and S6, 7, 17-20; T22N; R30W, and S12-13; T22N, R31W; PMM; Sanders County, Montana). The project would be located within the 50,000+ acre Beaver Creek Planning Subunit, which includes the Beaver and Little Beaver Creek drainages. It would focus specifically in the lower reaches of this Planning Subunit, where National Forest Land meets privately owned property. The project area itself encompasses approximately 2400 acres, of which approximately 1900 acres are proposed for some type of fuel reduction treatment. A map is included for your convenience.

How did we get here?

The Cabinet District has been approached by several landowners in the past requesting actions to address the mountain pine beetle infestations as well as provide for healthy forest conditions on federal land adjacent to private property. The Regional Office Pest and Pathology staff reviewed the area in the summer of 2006 and predicted the mountain pine beetle would possibly infest the Little Beaver and Big Beaver drainages within a two year time span. From field observations in the spring of 2007, it was apparent that the infestations were occurring at a faster pace that was originally predicted and is approaching epidemic levels. This, along with public concerns, helped identify high risk areas.

During the summer of 2007 and spring of 2008, foresters and fuel specialists began surveying forest stands in the area, evaluating the stands in terms of their fire hazard potential, adjacency to existing fuel breaks, topography, prevailing winds, as well as proximity to potential ignition sources, private property, homes and access constraints.

The project area was identified through public collaboration that included three meetings (July 23, 2007, October 2, 2007, and February 8, 2008) and two field trips (July 23, 2007 and October 2, 2007) with interested members of the public – over 120 invitations were sent out to adjacent landowners, stakeholders, government entities, agencies, environmental organizations, utility companies, and forest products companies, etc. The meetings helped determine the merits of conducting a fuels reduction project followed by the development of a proposed action. The field trips focused on the need for hazardous fuels reduction treatments in the area. Discussions included potential silvicultural prescriptions and methods of harvest, as well as post-harvest treatment of the surface fuels and the activity fuels created during the harvest process. Underburning, grapple-piling and pile burning were all discussed as methods for treating the activity fuels.

The proposed treatments would occur on a variety of Management Areas (MA) designated in the Kootenai National Forest's Land and Resource Management Plan (1987). All the proposed harvest areas to the south of Little Beaver Creek would take place on Management Area 12 and the area to the north of Little Beaver is primarily MA-10, though the area contains smaller areas of other MAs. Management Areas found in the project area are:

Management Area	***General Goals***
MA-5	Viewing Areas (considered as unsuitable for timber harvest)
MA-5og	Areas within MA-5 designated as Old Growth (considered as unsuitable for timber harvest)
MA – 10	Big-Game Winter Range (considered as unsuitable for timber harvest)
MA-10og	Areas within MA-10 designated as Old Growth (considered as unsuitable for timber harvest)
MA-12	Big-Game Summer Range (designated as suitable for timber harvest)
MA-13	Old Growth (considered as unsuitable for timber harvest)
MA-16	Timber/Viewing (designated as suitable for timber harvest)
MA-19	Steep Lands (considered as unsuitable for timber harvest)
MA-19og	areas within MA-19 designated as Old Growth (considered as unsuitable for timber harvest)

Purpose and Need for action

This purpose and need addresses the goals and objectives set forth in the Kootenai National Forests' (KNF) Forest Plan (1987), National Fire Plan, Healthy Forests Initiative, the Healthy Forests Restoration Act (2003), and the Sanders County Community Fire Protection Plan.

Based on public input, field evaluation by district resource specialists, and approval by the District Ranger, the following purpose and need for treatment has been identified:

- **Protect life, property, and resources within and adjacent to the Wildland/Urban Interface by reducing the levels and continuity of hazardous fuels.**

- **Focus fuel reduction treatments in areas that are at moderate to high risk to wildfire.**

- **Implement treatments that would transition at-risk areas toward a sustainable forest ecosystem that is more resilient and resistant to wildfire and other disturbances.**

Much of the project area consists of densely stocked forest stands that originated in the aftermath of the 1889 and the 1910 fires. The dense stocking levels have resulted in significant stress to trees within these stands. Crowded conditions result in increased competition for limited moisture, increased susceptibility to insects, disease pathogens, and other processes which result in tree mortality. As these trees die, excessive woody fuel accumulates and subsequent flushes of tree regeneration can result, increasing dense, live ladder fuels, setting the stage for crown fires. Many of the forest stands in the project area are in this condition and occur over large, continuous expanses, some in proximity to private land and associated developments.

Because these stands are within the identified Wildland/Urban interface, the current fuel conditions pose a threat to both natural resources and developments in and adjacent to the project area. Because of the risk of losing these values to wide spread fire, it is problematic to allow fire to burn through the project area without prior fuel treatments; given the current fuel situation the adverse impacts of fire would be too great. Therefore, fire suppression will continue in this area. However, in the event of a wildfire in the project area, the topography and current fuel conditions could result in severe fire behavior, with flame lengths, spread rates and fire intensities greater than firefighters could safely and effectively suppress. Moreover, in many forest stands a fire could easily move into the crowns of trees, further impeding suppression efforts.

Because protection of the natural resource and development values in the project area is important and successful fire suppression efforts in this area could be difficult or impossible under certain weather conditions, there is a need to reduce fuels within the project area to alter potential fire behavior. Fuel reduction activities would reduce the negative impacts of a severe wildfire, create safer conditions for both the public and firefighters and provide for more effective fire suppression.

Fuel reduction immediately adjacent to private land and developments would provide a defensible space where firefighters could safely suppress smaller fires spreading from one land ownership to the other. However, limiting fuel reduction to areas adjacent to private land alone would neither protect other resource values nor provide adequate protection from a larger, fast-moving fire event. Fuel reduction efforts in key locations throughout the project area would

disrupt both fuel quantity and continuity and would create strategic areas that modify the behavior of potential wildfires, as well as diminish the risk from a large fire in the treated areas. Potential spread rates and fire intensities would be lowered, improving the ability to successfully suppress fires and effectively reduce risks to life, property, natural resources and other values.

Protection of forest ecosystem components is complementary to, if not necessary, to achieving our first goal—hazardous fuel reductions. In order to achieve a long-term, landscape fuel condition that would result in lower intensity or mixed severity fire, the forest ecosystem must be restored to one that would have occurred historically in mixed-severity fire regimes.

Proposed Action

Forest Stand Treatments

This project would treat fuels and forest vegetation in various methods, depending upon the site-specific conditions that occur in each of the forest stands. The enclosed map illustrates where these treatments would occur in the project area.

A discussion of proposed treatment types (displayed on the attached map) is provided below:

Commercial Thin: Forest stands proposed for treatment that have sufficient numbers of healthy trees of a fire resistant species such as western larch and ponderosa pine would be "commercially thinned" to selectively remove subordinate trees and those trees contributing greatest to the hazardous fuel conditions, while emphasizing retention of larger trees and those trees which tend to be longer-lived and/or more resistant to insect and disease infestations.. Approximately 780 acres would be treated using this thinning. After thinning, the hazardous fuels would be mechanically piled and burned, or the fuels would be left un-piled and reduced using prescribed fire.

Regeneration Harvest: Stands with high mortality levels due to mountain pine beetle, and that have few healthy trees or high densities of those tree species which tend to be shorter-lived and/or less resistant to insects and diseases would generally be regenerated[1] (approximately 398 acres). This treatment would focus on lodgepole pine stands that are affected by the mountain pine beetle and associated high fuel levels. After the regeneration cutting, hazardous fuels would then either be mechanically piled and subsequently burned, or the fuels would be left un-piled and reduced using prescribed fire. Openings created would be planted or naturally seeded to regenerate the stand.

Due to the high observed and anticipated mortality levels in the lodgepole pine due to mountain pine beetles, some regenerated areas would result in openings exceeding 40 acres, and may require Regional Forester approval to implement. As displayed in the Unit Summary Table (attached), units 1, 3, 4 and 5 would all exceed the forty acre opening size limitation, requiring Regional Forester approval.

[1] Regeneration cutting is the removal of trees in a stand to make the regeneration of a new stand possible.

Prescribed Burn Only: The project would include use of prescribed fire without commercial timber harvest, on approximately 691acres. Some small (non-merchantable) trees and shrubs might be cut down in these units to facilitate prescribed burning. Many of these treatment areas are now dominated by large ponderosa pine with interspersed patches of younger and smaller trees. Burning these areas would reduce the dead fuels and conifer in-growth, retaining the larger, more fire resistant trees. Others such areas consist of older shrub fields with interspersed tree patches. Burning these areas would reduce fuels in these areas and encourage new sprouting of forage. This would enhance the ability of these shrub fields to act as fuel breaks, while at the same time creating more desirable browse for deer, elk and moose.

Harvest Methods and Slash Treatments

In all proposed timber harvest units, sawtimber and non-sawtimber material would be removed using different types of harvesting or skidding methods depending upon site and resource conditions. Of the total 1,187 acres proposed for timber harvest, approximately 233 acres would be harvested using helicopters, 586 acres by skyline systems, and 368 acres by ground-based machinery such as tractors, skidders or harvester/forwarder equipment. In general, the more steep and inaccessible areas would be harvested using the helicopter or skyline harvest systems, while the more gentle and accessible areas would be harvested by one of the ground based harvest systems. Implementation of fuel reduction in areas requiring helicopter yarding is dependent upon an economic feasibility/salability analysis that supports helicopter logging.

Abatement of activity and natural fuels will be accomplished through a combination of slashing, piling, burning, chipping or mastication of sub-merchantable material. Any opportunities to remove this slash component or make it available for woody biomass will be pursued prior to on site piling/burning/chipping or mastication.

Soil Protection & Smoke Management

Soil mitigation measures will be determined and incorporated into project design to minimize compaction and meet soil detrimental disturbance standards in proposed timber harvest areas and new road locations. Prescribed burning (piles as well as underburning) would be conducted at times and under conditions that would minimize or prevent accumulation of smoke to such degree as necessary to meet State and Federal ambient air quality standards.

Road Work Needed to Access Treatment Areas

A Travel Analysis Process will be conducted by the interdisciplinary team to identify long-term transportation needs in the vicinity of the project area. This process will consider access needs for recreation, fire suppression, vegetation management, and effects on aquatic and wildlife resources.

To facilitate proposed fuel reduction activities some road maintenance, reconstruction and construction activities would be required. In addition, while conducting the road work necessary to access the treatment areas, additional measures would be taken to improve the condition of

some of the existing roads, in an effort to reduce the potential for sediment delivery to nearby streams.

The proposed action includes constructing approximately 5.5 miles of new permanent road to provide access to the south side of the Little Beaver Creek area. Other road work would include two miles of temporary road, and 2.5 miles of road reconstruction. The permanent roads would be used for official administrative purposes only, and closed to motorized public use. The temporary roads would be decommissioned after project activities are completed. The enclosed map illustrates the locations and types of roadwork being proposed.

Other

In addition to the above, the following design features are being considered in the proposed action. Others may be identified as the planning, analyses and public involvement proceed:

1. The amount of dead wood left on a site would be maintained within recommended ranges (Graham 1994). Retention goals for the moist forest habitat types where harvest is proposed are 17-33 tons of downed woody material greater than eight inches in diameter, per acre. For the drier habitat types, the recommended retention level is 6-13 tons/acre. Due to concern for fire risk in the interface area, the lower end of these ranges will be targeted where NFS lands meets privately owned property.

2. No-harvest buffer zones for lakes, streams, wetlands and other riparian habitat would be included in and adjacent to harvest units as designed by the project fish biologist, hydrologist, botanist and soil scientist utilizing standards in the Forest Plan and other site-specific recommendations, including Best Management Practices.

3. Any rare or sensitive plants, as well as culturally sensitive areas will be excluded from unit boundaries and treatment areas as determined adequate by resource specialists.

Additional site-specific considerations may be identified and recommended by resource specialists (soils, botany, archaeology, riparian, watershed, and wildlife), agreed to by the Interdisciplinary Team, and approved by the District Ranger. Any additional site-specific design measures may reduce the total number of acres of treatment identified in this proposed action.

Your Opportunity to Comment

To ensure their consideration in the preparation of the EA, written comments must be received by September 26, 2008. Comments sent via U.S. Postal Service must be postmarked by the due date to be considered timely relative to establishing standing for the objection process. The comment period is being provided to those interested in or affected by this proposal to make their concerns known prior to a decision being made by the Responsible Official. Written, facsimile, hand-delivered, oral, and electronic comments will be accepted.

Written comments are most useful and must be addressed and submitted to: Mike Herrin, District Ranger, Cabinet Ranger District, 2693 Hwy 200, Trout Creek, MT, 59874; You may also

provide input by calling (406) 827-3533; or you may fax your comments to (406) 827-0718. The office business hours for those submitting hand-delivered or oral comments are 7:30 a.m. to 4 p.m. Monday through Friday, excluding holidays.

Electronic comments must be submitted in rich text format (.rtf), or Word (.doc) to the following e-mail address - northern-kootenai-cabinet@fs.fed.us. The subject line of electronic input must contain the name of the project (Little Beaver Hazardous Fuel Reduction project) for which you are submitting comments. Acceptable formats are MS Word, Word Perfect, or RTF. 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.

Those people providing comments should include: (1) their name, address, telephone number, organization represented, if any; (2) title of the document on which the comment is being submitted; and (3) specific facts and supporting reasons for the Responsible Official to consider. Copies of the future environmental analysis documentation will be mailed to those people who have submitted comments either before or during the comment period and to those who request a copy.

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. Comments submitted anonymously will be accepted and considered; however, those who submit anonymous comments will not have standing to object to the decision.

This document and the attachments are available at the following web site:
http://www.fs.fed.us/r1/kootenai/projects/projects/index.shtml

Please let us know if you no longer wish to receive information on this project. Please be aware that the District will host an open house meeting on September 17, from 5:00 to 8:00 PM to discuss this proposal with all interested parties. If you need additional information regarding this proposal before that meeting, please contact Matt Martens (Project Leader), or Alan Osborn (District Fire Management Officer) at the Cabinet Ranger District.

Sincerely,

MIKE HERRIN
District Ranger

Attachments (3): Vicinity Map, Project Map, & Unit Summary Table.

Pursuant to 7 CFR 1.27(d), any person may request the agency to withhold a submission from the public record by showing how the Freedom of Information Act (FOIA) permits such confidentiality. Persons requesting such confidentiality should be aware that, under FOIA, confidentiality may be granted in only very limited circumstances, such as to protect trade secrets. The Forest Service will inform the requester of the agency's decision regarding the request for confidentiality, and where the request is denied the agency will return the submission and notify the requester that the comments may be resubmitted with or without name and address within a specified time.

Little Beaver Hazardous Fuels Reduction Project - Proposed Activity Summary

Unit	Acres	Proposed Stand Treatment	Slash Disposal Method	Harvest & Logging Systems
1	134	Regeneration/Seed Tree	Excavator pile	Skyline/Tractor
2	24	Commercial Thin	Spot piling and/or underburning	Tractor
3	43	Regeneration/Seed Tree	Excavator pile	Tractor
4	88	Regeneration/Seed Tree	Excavator pile	Tractor
5	44	Regeneration/Seed Tree	Excavator pile	Tractor
6	22	Regeneration/Seed Tree	Excavator pile	Tractor
7	47	Commercial Thin	Jackpot underburning	Skyline
8	19	Commercial Thin	Spot piling and/or underburning	Tractor
9	12	Commercial Thin	Jackpot underburning	Skyline
10	215	Commercial Thin	Spot piling and/or underburning	Skyline/Tractor
11	32	Commercial Thin	Spot piling and/or underburning	Tractor
20	61	Commercial Thin	Spot piling and/or underburning	Tractor
21	98	Commercial Thin	Jackpot underburning	Skyline
22	39	Commercial Thin	Jackpot underburning	Skyline
30	123	Commercial Thin	Jackpot underburning	Helicopter/Optional
31	13	Commercial Thin	Jackpot underburning	Helicopter/Optional
32	24	Commercial Thin	Jackpot underburning	Helicopter/Optional
33	73	Commercial Thin	Jackpot underburning	Helicopter/Optional
40	35	Regeneration/Seed Tree	Excavator pile	Skyline/Tractor
41	32	Regeneration/Seed Tree	Excavator pile	Skyline
500	156	Slash sub merchantable	Underburn	N/A
501	41	Slash sub merchantable	Underburn	N/A
502	47	Slash sub merchantable	Underburn	N/A
503	153	Slash sub merchantable	Underburn	N/A
504A	70	Slash sub merchantable	Underburn	N/A
504B	138	Slash sub merchantable	Underburn	N/A
505	31	Slash sub merchantable	Underburn	N/A
506	40	Slash sub merchantable	Underburn	N/A
507	15	Slash sub merchantable	Underburn	N/A

Spot piling – only those areas within the treated areas that have a lot of fuel accumulations would be excavator piled, as opposed to broader piling across the unit.

Jackpot burning – jackpots are those areas where the activity fuels have accumulated due to logging activity. These do not require additional piling to allow burning.