United States Department of Agriculture | Forest Service | Beaverhead-Deerlodge National Forest | 420 Barrett Street
Dillon, MT 59725
406 683-3900

**File Code:** 1950
**Date:** June 7, 2011

Dear Interested Party:

Thank you for your interest and participation in project planning on the Pintler Ranger District, Beaverhead-Deerlodge National Forest (BDNF). Initial scoping for the **Flint Foothills Vegetation Management Project** began in July 2010, when the Forest solicited public comment on a proposal to use clearcut salvage logging, commercial and pre-commercial thinning, and prescribed fire to harvest wood products and restore resiliency on about 5,600 acres of National Forest System Lands south of Drummond, MT. Six comment letters were received in response to that solicitation.

After reviewing the comments on the initial proposal, combined with internal assessment of the project, portions of the project have been redesigned and the Forest Service is again seeking public input. Four distinctions between the proposal issued in July 2010 and this proposal are:

1. The previous proposal planned to use prescribed fire in high elevation mixed conifer stands to promote resiliency and regeneration of white bark pine. Under this new proposal the objectives are to use prescribed fire in low and mid-elevation mixed conifer stands affected by a widespread bark beetle infestation to provide managed disturbances to promote resiliency. Prescribed fire is proposed in areas that have steep and rocky slopes or lack road access.

2. Potential old growth has been identified on approximately 150 acres within proposed treatment units. Because of the potential mortality to old growth from the bark beetle infestation, this proposal includes thinning treatments in these areas to improve the likelihood that old growth will be retained on the landscape.

3. The new proposal will be documented in an environmental impact statement (EIS) rather than an environmental assessment and the decision will be documented in a Record of Decision. A Draft EIS is expected for public review and comment in mid-April 2012.

4. The numbers of proposed vegetative or harvest treatment units decreases in the new proposal while the total number of acres treated increases slightly. Table 1 displays a comparison of the previous and current proposal.

Table 1. Comparison of previous proposal and current proposal

| Vegetation Treatment Type | Number of Units | | Acres of Treatment | |
|---|---|---|---|---|
| | Previous Proposal | Current Proposal | Previous Proposal | Current Proposal |
| Clearcut salvage dead + dying lodgepole pine and harvest post + poles | 30 | 26 | 668 | 863 |
| Commercial thinning ponderosa pine and Douglas-fir | 22 | 20 | 1,095 | 1,007 |
| Combination of clearcut lodgepole pine salvage + commercial thinning | 13 | 15 | 559 | 703 |
| Pre-commercial thinning | 40 | 25 | 1,039 | 1,146 |
| Prescribed Burning | 4 | 8 | 2,230 | 1,990 |
| Total | 109 | 94 | 5,591 | 5,709 |

## Background

The project area is located in the Flint Foothills and Flint Uplands Management Areas (MA) within the Clark Fork Flint landscape described in the 2009 Beaverhead-Deerlodge Forest Plan (FP, pp 109-124). No treatment units occur within the Flint Uplands MA. A widespread mountain pine beetle infestation is affecting the project area and much of the BDNF. A 2009 aerial assessment of the Forest identified over 800,000 acres of mountain pine beetle infestation. For the period 2000-2007, nearly 51,000 acres of the Clark Fork Flint landscape were affected by mountain pine beetle. Aerial assessment data for 2010 is not yet compiled. It will be available in the near future and disclosed when the environmental analysis is released to the public.

Local communities and community leaders have expressed concerns related to the amount or scale of the beetle mortality, the effects to recreation opportunities, wildlife habitat, and livestock management in the project area, and how the BDNF will manage the landscape to provide future timber products. There are a number of in-holdings of private land within the landscape where landowners have expressed fire risk concerns.

## Purpose and Need for Action

The purpose and need for this proposal is to:

1.) Salvage harvest dead and dying lodgepole pine stands to create managed conditions. This would contribute to the Forest Plan desired condition that people and communities benefit from programs and infrastructure that support an array of forest products and services (FP, p.11).

(2.) Harvest wood products from forested stands infested or at risk for infestation with bark beetles before the value of the wood deteriorates. The Forest Plan product utilization goal is to use forest products to provide economic benefits where project objectives, forest plan objectives and forest plan standards can be met (FP, p. 38).

3.) Reduce forest densities in dense, low elevation ponderosa pine and Douglas-fir stands. These stands are in need of thinning to “improve resilient forest conditions”. The Forest Plan objective for forested vegetation is to reduce forest density in large size classes of dry forest communities and some lodgepole pine communities to maintain and improve resilient forest conditions (FP, p. 43). Using prescribed fire as a disturbance agent in dry forest communities that include a mix of Douglas-fir and ponderosa pine would produce less dense stands, allowing frequent low intensity fire to occur, which then maintains diversity and structure that are resilient to crown fire.

4.) Create early seral conditions in mid elevation lodgepole pine stands. In the lodgepole pine type, the Forest Plan objective is to increase the acres in the 0 to 5 DBH inch class…where …insect infested stands are dead or dying" (FP, p.44).

5.) Reduce stand densities in young previously harvested stands. This addresses the Forest Plan objective to "Manage those stands already in a managed condition to maintain long term sustained yield" (FP, p. 38). Reducing stand density would redistribute growth to the best trees and increase spacing to reduce potential for mountain pine beetle attack by increasing vigor and increasing interior stand temperatures and wind patterns.

6.) Commercially thin approximately 150 acres of old growth to improve the likelihood of retaining old growth in this landscape because of the potential mortality from the bark beetle infestation.

## Proposed Action

The Flint Foothills Vegetation Management Project proposes to use clearcut salvage logging, commercial and pre-commercial thinning, and prescribed fire on 5,709 acres of National Forest System Lands within the 44,522-acre project area.

Specifically, the project would:

- Clearcut salvage 863 acres of beetle-killed and dying lodgepole pine,
- Commercial thin 1,007 acres of ponderosa pine and Douglas-fir,
- Use a combination of clearcut salvage and commercial thin on 703 acres of mixed Douglas-fir and logdepole pine stands,
- Pre-commercial thin 1,146 acres of previously harvested stands of lodgepole pine and Douglas fir,
- Use a combination of high and low intensity prescribed fire on 1,259 acres of mid-elevation mixed conifer stands dominated by lodgepole pine,
- Use low intensity prescribed fire on 731 acres of lower-elevation Douglas-fir and ponderosa pine stands.

See attached map and Table 2 (below) of proposed treatment units.

### *Clearcut Salvage of Lodgepole Pine Stands*

Dead and dying lodgepole pine would be salvaged on 863 acres. Most of the lodgepole pine that is currently alive is expected to be dead or dying by the time the project is implemented. All lodgepole pine in the salvage units would be removed except for retention of live trees to meet Forest Plan snag retention standards (FP, p. 44). Salvage harvest would occur on 26 units ranging in size from 2 to 122 acres.

Eight proposed lodgepole pine salvage units exceed 40 acres in size, ranging from 41 to 122 acres (see Table 2 below). Forest Plan timber standard 2 (FP, p. 39) allows openings created by one regeneration unit to exceed 40 acres on lands suitable for timber production when a natural event created an undesirable opening. This requires public notification and Regional Forester approval.

### *Commercial thin of Ponderosa pine and Douglas-fir Stands*

Ponderosa pine and Douglas-fir stands would be commercially thinned on 1,007 acres. Not all of these stands are pure Ponderosa Pine/Douglas-fir type and contain a component of bark beetle infected

lodgepole pine. A combination of clearcut salvage and commercial thin would be used on 703 acres of mixed stands. A total of 146 acres of old growth stands are included in this treatment; these acres would meet minimum criteria for old growth after treatment consistent with Forest Plan standards (FP, 44). Light underburning would be used after commercial thinning to remove remaining ladder fuels not removed during harvest. No burning would be used in old growth stands; therefore the commercial thin units that contain old growth stands would be excluded from burning. Commercial thins would occur on 20 units ranging in size from 3 to 173 acres.

Clearcut salvage and commercial thins would be accomplished with conventional, ground based timber harvest equipment such as rubber-tired skidders, and would be limited to slopes of less than 35 percent.

Approximately 134 acres of commercial harvest in units 7CS, 26S, 28C, 29C, 30C, 33C, 60CS, and 68S is proposed to occur on slopes greater than 35 percent. Cable logging systems would be used in these areas.
Table 2 displays the acres of proposed clearcut salvage, commercial thin, and combination commercial thin/clearcut salvage by unit.

Table 2. Proposed Lodgepole Pine Clearcut Salvage and Commercial Thinning Units by Acres and Rx

| Unit | Acres | Prescription | Unit | Acres | Prescription | Unit | Acres | Prescription |
|---|---|---|---|---|---|---|---|---|
| 1C | 101 | Commercial thin | 25C* | 64 | Commercial thin | 47S | 13 | Clearcut salvage |
| 2 | 0 | Eliminated from proposal | 26S[1] | 25 | Clearcut salvage | 48CS | 196 | Commercial thin/ Clearcut salvage |
| 3 | 0 | Eliminated from proposal | 27C | 139 | Commercial thin | 49S | 43 | Clearcut salvage |
| 4 | 0 | Eliminated from proposal | 28CS[1] | 13 | Commercial thin/ Clearcut salvage | 50 S | 17 | Clearcut salvage |
| 5C | 47 | Commercial thin | 29C[1] | 17 | Commercial thin | 51S | 19 | Clearcut salvage |
| 6C* | 13 | Commercial thin | 30C[1] | 39 | Commercial thin | 52CS | 136 | Commercial thin/ Clearcut salvage |
| 6CS* | 14 | Commercial thin/ Clearcut salvage | 31C | 24 | Commercial thin | 55C* | 173 | Commercial thin |
| 7CS[1] | 77 | Commercial thin/ Clearcut salvage | 32C | 18 | Commercial thin | 56CS | 18 | Commercial thin/ Clearcut salvage |
| 8CS | 13 | Commercial thin/ Clearcut salvage | 33C[1] | 18 | Commercial thin | 57CS | 27 | Clearcut salvage |
| 9S | 2 | Clearcut salvage | 34C | 78 | Commercial thin/ Clearcut salvage | 58CS* | 49 | Commercial thin/ Clearcut salvage |
| 10S | 31 | Clearcut salvage | 35S | 50 | Clearcut salvage | 59C | 20 | Commercial thin |
| 11CS | 13 | Commercial thin/ Clearcut salvage | 36S[1] | 46 | Clearcut salvage | 60CS[1] | 14 | Commercial thin/ Clearcut salvage |
| 12CS | 33 | Commercial thin/ Clearcut salvage | 37S | 8 | Clearcut salvage | 61S | 88 | Clearcut salvage |
| 13C | 3 | Commercial thin | 39S | 79 | Clearcut salvage | 62S | 36 | Clearcut salvage |
| 16S | 7 | Clearcut salvage | 40S | 29 | Clearcut salvage | 63C | 73 | Commercial thin |
| 18CS* | 5 | Commercial thin/ Clearcut salvage | 41S | 4 | Clearcut salvage | 64C | 25 | Commercial thin |
| 19S | 41 | Clearcut salvage | 42S | 31 | Clearcut salvage | 65C | 8 | Commercial thin |
| 20C | 64 | Commercial thin | 43S | 20 | Clearcut salvage | 67S | 33 | Clearcut salvage |
| 22CS | 16 | Commercial thin/ Clearcut salvage | 44S | 20 | Clearcut salvage | 68S[1] | 38 | Clearcut salvage |
| 23C* | 69 | Commercial thin | 45S | 31 | Clearcut salvage | 69S | 2 | Clearcut salvage |
| 24C | 14 | Commercial thin | 46CS | 79 | Commercial thin/ Clearcut salvage | 71S | 122 | Clearcut salvage |
| *Denotes units with old growth. | | | | | | 72S | 28 | Clearcut salvage |

| Unit | Acres | Prescription | Unit | Acres | Prescription | Unit | Acres | Prescription |
|---|---|---|---|---|---|---|---|---|
| [1]Approximately 134 acres of commercial harvest in units 7CS, 26S, 28CS, 29C, 30C, 33C, 60CS, and 68S would occur on slopes greater than 35 percent ;cable harvest methods would be used in these areas. | | | | | | | Total | 2,573 acres |

### *Actions Common to Salvage Harvest and Commercial Thin Activities*

Trees would be whole tree logged and skidded to central landing areas adjacent to roads where they would be processed into logs and loaded on trucks for transport to area sawmills. Unmerchantable material brought to the landing would be piled for chipping or burning. Burning would occur when weather and ground conditions are suitable to maintain air quality and burning can be controlled.

Constructed skid trails and temporary roads would be obliterated and re-vegetated with native seed, and landings would be re-vegetated with native seed and areas of compacted soil would be scarified prior to seeding. Temporary roads constructed for timber harvest activities would be closed to the public during the implementation of the project and obliterated upon project completion.

Approximately 10 miles of temporary roads would be constructed to access the salvage harvest, commercial thin and combination commercial thin /salvage units.

Road maintenance would occur on portions of all National Forest System (NFS) roads associated with the project. Approximately 72 miles of NFS roads would be used for hauling. Maintenance would occur either during or prior to commercial harvest activities. Road maintenance typically addresses grading, drainage features such as culverts, ditches, drainage dips, and spot surfacing as needed to meet Best Management Practices (BMPs). Timing of project activities would comply with existing travel management direction unless modified by the deciding official for implementation.

### *Pre-Commercial Thin of Lodgepole Pine and Douglas-fir Stands*

Pre-commercial thins would be used to treat 1,146 acres of naturally regenerated, previously harvested stands in 25 units. Retaining ponderosa pine, Douglas-fir and then lodgepole pine (in order of preference) would enhance species diversity improving long-term resiliency of these stands. Trees would be thinned to a 9-foot to 16-foot spacing (300 to 500 trees per acre). Lopping and scattering of branches would be included activities.

Piling would occur during thinning and lopping operations. Piles would be burned during winter or spring when there is snow cover, frozen ground, or moist soil conditions to minimize impacts to soils. Noxious weeds would be monitored and treated if necessary.

Table 3 displays the units and acreage of pre-commercial thin treatments.

Table 3. Proposed Pre-commercial Thin Units

| Unit # | Acres | Unit # | Acres | Unit # | Acres |
|---|---|---|---|---|---|
| 1P | 104 | 11P | 22 | 21P | 8 |
| 2P | 21 | 12P | 4 | 22P | 4 |
| 3P | 5 | 13P | 47 | 23P | 187 |
| 4P | 24 | 14P | 138 | 24P | eliminated |
| 5P | 56 | 15P | 42 | 25P | eliminated |
| 6P | 22 | 16P | 99 | 26P | 28 |
| 7P | 26 | 17P | eliminated | 27P | eliminated |
| 8P | 39 | 18P | 50 | 28P | eliminated |
| 9P | 31 | 19P | 78 | 29P | 13 |
| 10P | 32 | 20P | 17 | 30P | 49 |
| | | | | Total | 1,146 |

### *Prescribed Burn of Mid-elevation Lodgepole Pine and low-elevation Douglas-fir and Ponderosa Pine Stands*

Prescribed fire would be used on 1,990 acres within eight units ranging in size from 15 to 710 acres. Ignitions may occur over multiple years.

Prescriptions at mid-elevations would occur in on 1,258 acres of lodgepole pine where mixed-intensity fires would have ignitions on 40 percent of the delineated units and fire spread beyond initial ignition on up to 100 percent of the units is acceptable. This would result in a mosaic of mixed severity burned areas with the objective of 50 percent mortality in the overstory trees within the unit. The unburned portions of the units would primarily include riparian areas. Control lines would primarily be natural features such as rock slopes and natural fuel breaks. In the Mount Princeton area, about 2,000 feet of lightly constructed hand fireline would be needed to control the prescribed fire along the ridge. This line would be rehabilitated if necessary after activities are complete, and monitored for weed infestations.

Prescriptions at lower elevations would occur on 731 acres of Douglas-fir and ponderosa pine where low-intensity understory burns would occur across all acres.

Prescribed fire would use either aerial ignition (for mid-elevation burns) or hand-lighting (both mid-elevation mixed intensity and understory light intensity burns). Some hand-falling of trees may occur to facilitate burning objectives. Burning would occur when weather and ground conditions are suitable to maintain air quality and burning can be controlled.

Table 4 displays the acres of prescribed burning by unit.

Table 4. Proposed Prescribed Burning Units

| Unit | Acres | Unit | Acres | Unit | Acres |
|---|---|---|---|---|---|
| 1B | 22 | 4B | 251 | 7B | 298 |
| 2B | 15 | 5B | 710 | 8B | 232 |
| 3B | 298 | 6B | 164 | Total | 1,990 |

## Preliminary Issues/Concerns

The interdisciplinary team and the July 2010 scoping responses identified the following potential issues associated with the proposed action.

- Potential to impact populations of westslope cutthroat trout through harvest and associated activities.
- Potential to increase runoff and erosion by removing vegetation and ground cover.
- Potential to increase noxious weeds populations.
- Maintenance of old growth stand characteristics where encountered.
- Mitigation of management actions around active nests of TES bird species including great gray owls and Northern Goshawk.
- Maintenance of secure habitat to contribute to wildlife linkages for large animal movements between the Flint Creek Range and Henderson Mountain/John Long Mountains west of the project area.
- Timing of burning and harvest activities with livestock grazing management, dispersed recreation, hunters and outfitters.
- Coordination with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) projects in the project area.

## Decision to be Made

The Forest Supervisor will be the Responsible Official for this project and will decide whether to implement the proposed action or an alternative developed in response to specific resource issues and public comments.

## How to Get Involved

We would like your comments on the proposed activities. Your comments will be used to help (1) refine the purpose and need; (2) determine the scope of the issues to be addressed; (3) determine the significant issues related to the proposed actions; (4) identify the need for alternatives to the proposed action; (5) identify mitigation and other improvements; and (6) help to frame a public involvement plan.

We will accept comments at any stage of the analysis; however your comments will be most helpful if received July 5, 2011. All ideas will be considered and the more detail you provide, the more helpful your comment is likely to be.

Please send your written input to:

Email: comments-northern-beaverhead-deerlodge-pintler@fs.fed.us.

Subject: Flint Foothills Project

Mail: Charlene Bucha Gentry, District Ranger
Pintler Ranger District
88 Business Loop
Philipsburg, MT 59858

Fax: 406-859-3689

Your comments, including your name and address, will be considered part of the public record and will be available for public inspection. If you would like to be included on the **Flint Foothills Vegetation Management Project** mailing list, please let us know. Persons not responding to this mailing will not receive further information about this project. If you wish to participate in the environmental analysis or to be kept informed of the process but are unable to respond to this scoping document, please contact us at the address above. We prefer to use an e-mail format if that is available to you.

For more information about the project, please contact Julie Knutson, Team Leader at 559-920-6646 or Karen Gallogly, Project Coordinator at 406-683-3853, or Charlene F. Bucha Gentry, District Ranger at 406-859-3211.

Sincerely,

*/s/ David R. Myers*
DAVID R. MYERS
Forest Supervisor

Enclosure: map