

**TENMILE SOUTH HELENA FOREST RESTORATION COLLABORATIVE COMMITTEE**

**COMMENTS FOR**

**TENMILE - SOUTH HELENA PROJECT**

**DRAFT ENVIRONMENTAL IMPACT STATEMENT**



**Prepared for:**

**Tenmile South Helena Forest Restoration Collaborative Committee**

**March 2016**

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April 4, 2016

Bill Avey, Forest Supervisor, Helena National Forest  
Heather DeGeest, District Ranger, Helena Ranger District  
2880 Skyway Drive  
Helena, MT 59602

Re: Tenmile South Helena Forest Restoration Collaborative Committee comments on the Tenmile South Helena Project Draft Environmental Impact Statement

Dear Mr. Avey and Ms. DeGeest:

The following document is a summary of the work of the Ten Mile-South Helena Forest Restoration Collaborative Committee (TSH Collaborative). The TSH Collaborative was created by Resolution 20106, on July 21st, 2014 by the City of Helena, Montana. The City issued the following objectives to the TSH Collaborative; "A) Provide recommendations to the state and federal agencies on projects being proposed in the Ten Mile municipal watershed and South Helena Area. This may include watershed restoration, vegetation management, wildfire mitigation, mine reclamation, recreation, and other projects; B) Identify potential project design and implementation issues, and seek solutions early in the site selection and project planning processes; and C) Offer the agency input/knowledge regarding the potential effects of a proposed action or activity."

The TSH Collaborative voted to operate by consensus, which means all members had to agree for the recommendation to move forward. We also included recommendations that had full consensus, minus one member, which were also forwarded to the Forest Service. Please see Content area #5 for full explanation.

The TSH Collaborative felt it was important to recognize the 2008 Collaborative's hard work and dedication. The current collaborative reviewed the 2008 Collaborative's recommendation summary and updated it to include completed work projects. Under Content area #6 that update is presented.

Aldo Leopold stated that "Conservation is a state of harmony between men and land." The committee worked hard to balance the needs of mitigation within the Wildland Urban Interface (WUI), to honor the characteristics of the Inventoried Roadless Areas (IRAs), and to recognize the hazards created by the Mountain Pine Beetle (MPB) infestation in terms of wildland firefighter safety and the recreational use of the Continental Divide Trail (CDT) system.

The TSH Collaborative met 19 times over the course of 15 months, not counting the conference calls the Leadership Team had with the Facilitator to plan the meetings and develop a course of action. In developing these recommendations, we have invested over 530 volunteer hours.

The 36 recommendations (see Content area #9) are categorized into 10 sub-groups which address the 853-page Draft Environment Impact Statement (DEIS) that the Forest Service issued on February 5th, 2016 and published in the National Register on February 19th, 2016. We believe these recommendations will make the Ten Mile-South Helena Project area a safer, and better place for the citizens to live, work, and recreate.

Thank you,

Joe Cohenour, Chair-TSH Collaborative  
Conservation Organization representative

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## 1. INTRODUCTION

The Tenmile South Helena Forest Restoration Collaborative Committee (Collaborative) was formed by the Helena City Commission to review projects in the Tenmile municipal watershed and South Helena area. The Collaborative has prepared this report as their initial review of the Helena National Forest's (HNF) Tenmile South Helena Project. This report includes detailed comments for submission to the HNF in relation to their Tenmile South Helena Project Draft Environmental Impact Statement (DEIS).

The U.S. Forest Service's (USFS) purposes for this project are:

- To maintain a consistent quantity and quality of water within the municipal watershed by reducing the probability of high-severity wildfires and their associated detrimental watershed effects in the Tenmile municipal watershed and surrounding area and by reducing sources of sediment and other contaminants to the water sources, and
- To improve conditions for public and firefighter safety across the landscape in the event of a wildfire.

In order for this project to contribute to the above purpose, the USFS states that there is a need to:

- Create a mosaic of vegetation and fuel structure more resilient to disturbance to provide for safer, more effective fire suppression actions and improve public safety. Reducing intensity of wildfires and increase fire suppression effectiveness would improve protection measures for the surrounding communities and key municipal watershed infrastructure. These actions would reduce the probability of post-wildfire watershed impacts in the Tenmile municipal watershed.
- In addition, sources of anthropogenic sediment to streams need to be addressed in order to improve water quality, watershed function, and other resource values in the Tenmile municipal watershed and surrounding area.

During scoping, the USFS identified significant issues related to this project, including: (1) Inventoried Roadless Areas (IRA), (2) elk security and hiding cover, (3) recreational trails, and (4) road construction.

The Tenmile – South Helena Project area covers 61,395 acres in Lewis and Clark, Powell, and Jefferson Counties including 49,546 acres of National Forest System lands, 1,043 acres of Bureau of Land Management (BLM) lands, and 10,806 acres of private, state, city, and other ownership lands.

The Collaborative's comments, transmitted to the USFS by way of this report, address the three alternatives analyzed in the DEIS, including Alternative 1, the no action alternative; Alternative 2, the proposed action; and Alternative 3. Please see the [Tenmile South Helena DEIS](#) for a complete description of these alternatives and for the accompanying analysis. Please see the City of Helena's [Tenmile Watershed Project's](#) webpage for additional documents pertinent to the Collaborative.

## 2. FORMATION OF COLLABORATIVE COMMITTEE

The Collaborative was created by the passage of Resolution Number 20106, “A Resolution Establishing the Tenmile/South Helena Forest Restoration Collaborative Committee” by the Helena City Commission on July 21, 2014 (Appendix A).

The Helena City Commission wanted to form the Collaborative to consider “management opportunities in the Tenmile Watershed and the City of Helena’s wildland urban interface (WUI) for mitigation of fire risk and to reduce the potential for damage to the City’s public water supply infrastructure” (p. 1). The Collaborative was to “collaboratively review proposed projects within the watershed and WUI in relation to appropriate vegetation management, fire mitigation, watershed, and other resource and recreation management” (p. 1). This report serves as the Collaborative’s first formal review of a proposed project within the watershed.

In accordance with Section 1 of Helena City Commission Resolution 20106, the Collaborative is made up of 11 individuals:

- Chairman Joe Cohenour, representing conservation organizations (elected Chair March 11, 2015)
- Co-vice Chair Jordan Alexander, representing the fire community (elected Co-vice Chair March 11, 2015)
- Co-vice Chair Mike Bishop, citizen-at-large from the greater Helena area (elected Co-vice Chair March 11, 2015)
- Commissioner Cory Kirsch, representing Jefferson County
- Commissioner Mike Murray, representing Lewis and Clark County
- Ron Alles, representing City of Helena
- Jeff Chaffee, representing commercial use organizations
- Angie Grove, representing local recreational user organizations
- Gary Marks, representing commercial use organizations
- Eleanor Morris, representing conservation organizations
- Doug Powell, citizen-at-large from the greater Helena area

The following state and federal agencies and representatives from other watershed groups serve as technical advisors to the Collaborative, as per Section 2 of Helena City Commission Resolution 20106:

- Hoyt Richards, Montana Department of Natural Resources and Conservation (DNRC)
- Jenny Sika, Montana Fish, Wildlife & Parks (FWP)
- Dick Sloan, Montana Department of Environmental Quality (DEQ)
- Michael O’Brien, BLM
- Marshall Thompson, USFS
- John George, Natural Resource Conservation Service (NRCS)
- VACANT, Lake Helena Watershed Group

- Tim Love, Montana Forest Restoration Committee
- VACANT, Lincoln Restoration Committee

In accordance with Section 2 of Helena City Commission Resolution 20106 and based on recommendations from the Collaborative, the following individuals serve as additional technical advisors to the Collaborative:

- Wayne Berkas, United States Geological Survey (USGS)
- Tom Cleasby, USGS
- Doug Dodge, Jefferson County Department of Emergency Response
- Sarah Elkins, City of Helena
- Chris Evans, Lewis and Clark Conservation District
- Grant Hokit, Carroll College
- Brad Langsather, City of Helena
- Tillman McAdams, Environmental Protection Agency (EPA)
- Eric Roberts, FWP
- Dick Skinner, Montana Department of Transportation (DOT)
- Nancy Sweeney, NRCS

As per Section 3 of Helena City Commission Resolution 20106, in the comments section of this report the Collaborative:

- A. Provides recommendations to the USFS on the Tenmile South Helena Project
- B. Identifies potential Tenmile South Helena Project design and implementation issues and seeks solutions early in the site selection and project planning process
- C. Offers the USFS input/knowledge regarding the potential effects of a proposed action or activity

### 3. STAKEHOLDERS INVOLVED IN THE COLLABORATIVE

Table 1 lists all of the stakeholders in the Collaborative identified to-date. These stakeholders received regular emails from the Collaborative, including meeting agendas, meeting notes, Collaborative documents, and presentation materials.

**Table 1. Collaborative stakeholders identified to date.**

<b>Last Name</b>	<b>First Name</b>	<b>Association</b>	<b>Representing</b>
Abelin	Doug	Capital Trail Vehicle Association, Montana Trail Vehicle Riders Association	Motorized use community
Balazs	Steve	Resident within the project area	Public
Bik	Patricia	Public	Public
Chadwick	Dave	Montana Wildlife Federation	Executive Director
Darfler	Jan	Public	Public
Daugaard	Cathy	Public	Public
Ferry	Paul	Citizen	Public
Frasier	Stan	Prickly Pear Sportsman's Association	Member
Gatchell	John	Montana Wilderness Association	Conservation Director
Haire	Gene	Jefferson County resident	Public
Hallinan	Bill	Wild Divide Chapter of Montana Wilderness Association	Public
Hollow	Mary	Prickly Pear Land Trust	Executive Director
Hudson	Hank	Wild Divide Chapter of Montana Wilderness Association	Public
Infanger	Rocky	Tri-County FireSafe Working Group	Fire Suppression
Johnson	Patrick	Citizen of Helena	Public
Joslin	Gayle	Helena Hunters and Anglers Association	Wildlife biologist
Kent	Paul	Public	Public
Lewis	Shannon	Senator Jon Tester	Regional Director
Matthews	Jonathan	The Sierra Club	Upper Missouri Basin Group
McKelvey	Pat	Tri-County FireSafe Working Group	Tri-County FireSafe Working Group
Munther	Greg	Backcountry Hunters and Anglers	Montana Chapter Chairman
Paul	Kylie	Defenders of Wildlife	Rockies and Plains Representative
Posewitz	Jim	Public	Public
Rasmussen	Robert	Prickly Pear Land Trust	Trails Director
Reller	Roxa	Public	Public
Ricks	Lee	Pat Barnes Trout Unlimited	President
Shovers	Brian	Audubon Society	Audubon Society
Stiger	Sonny	Tri-County FireSafe Working Group	Modeler
Tipton	Diane	Resident within the project area	Public

#### 4. COLLABORATIVE MEETINGS TO-DATE

Table 2 shows the meetings of the Collaborative held to-date. All meetings were open to the public and time was made available for public comment.

**Table 2. Collaborative meeting dates and agenda items to-date.**

Meeting	Agenda Items
November 13, 2014	Collaborative governance, roads, elk hiding cover
December 13, 2014	Meeting of People Who Care, “let it burn” policy, relationship between USFS and Collaborative.
January 14, 2015	Fire modeling presentation, discussion of range of alternatives
February 11, 2015	Hydrology and soil science presentation, review of Request for Qualifications (RFQ) for a facilitator/coordinator, discuss structure of collaborative
March 11, 2015	Approve Collaborative Chair and Co-vice Chairs, wildlife biology presentation, discuss USFS project plans and expectations for Collaborative comments, discuss RFQ responses
April 8, 2015	Introduce facilitator/coordinator, discuss USFS project plans, discuss scoping comments, discuss updated project map
April 29, 2015	Mechanics of facilitation, review Collaborative background and documents, discuss decision-making models, discuss meeting schedule and objectives, Draft Divide Travel Plan, Collaborative outreach and social media
May 14, 2015	Approve Consensus-based Decisions and Ground Rules Agreement, Draft Divide Travel Plan
June 10, 2015	Q&A with Mark Finney, Jack Cohen, and Bruce Sims
July 1, 2015	Field trip: Marks – Miller Post and Pole, example of ponderosa pine ecosystem fuels reduction treatment by BLM; example of untreated, beetle affected lodgepole pine forest and road recontouring; example of mechanical fuels removal treatment in lodgepole pine forest; example of temporary road stream crossing and removal of culvert; example of mechanical fuels removal and pile burning treatment in lodgepole pine
July 8, 2015	Field trip review, Collaborative status check, project status table and schedule of DEIS, review of work of the 2009 Report Subcommittee, what can and cannot be done in Roadless areas, current status of private land fuels treatments in project area, discuss substitute voting
August 12, 2015	Types of fuel treatments proposed for project area, FWP perspective on Big Game Security Programmatic Forest Plan Amendment, Tri-County FireSafe Working Group perspective on the proposed action’s effectiveness at addressing safety concerns, recreationist’s perspective on the proposed action’s effects on recreation
September 16, 2015	Field trip: MacDonald Pass Burn, Wakina Sky Burn Area, Clancy/Unionville projects
October 7, 2015	Subcommittee’s work on the Table of Recommendations, results of the survey taken by Collaborative members, points of contention and points of consensus regarding fuel treatments in the project area

**TENMILE SOUTH HELENA FOREST RESTORATION COLLABORATIVE COMMITTEE**  
**Comments for Tenmile South Helena Project DEIS**

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<b>Meeting</b>	<b>Agenda Items</b>
November 4, 2015	Points of contention and points of consensus regarding fuel treatments in the project area (continued from last meeting), strategy from generating comments on the DEIS
January 13, 2016	Review of November 30, 2015 Montana Forest Restoration Collaborative meeting, Lolo Forest Restoration Collaborative's experience commenting on National Environmental Policy Act (NEPA) documents, discuss draft strategy for commenting on the DEIS, fire behavior comparison of treated versus non-treated forests, history of IRAs
March 3, 2016	Helena Hunters and Anglers Association perspective on the DEIS, test consensus on Collaborative comments regarding DEIS
March 9, 2016	Collaborative's consensus process check, discuss request to extend comment period for DEIS, test consensus on Collaborative comments regarding DEIS, break into groups to redraft comments that did not gain consensus, test consensus on redrafted comments

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## **5. CONSENSUS-BASED DECISIONS AND GROUND RULES AGREEMENT**

At the May 14, 2015 meeting of the Collaborative, the Collaborative approved the following model for consensus-based decisions and the following ground rules for conducting meetings.

### **5.1 CONSENSUS-BASED DECISIONS**

The Collaborative works by consensus to reach decisions and to develop recommendations for restoration projects within the project area. Consensus is tested by asking Collaborative members how they feel about a particular decision or recommendation according to the following statements:

1. “I can say I wholeheartedly agree with the decision.”
2. “I find the decision perfectly acceptable. It is the best option available to the Collaborative.”
3. “I can support the decision, although I am not especially enthusiastic about it.”
4. “I do not fully agree with the decision and need to register my view about it. However, I do not choose to block the decision. I am willing to support the decision because I trust the wisdom of the group.”
5. “I do not agree with the decision and feel the need to block the decision from being accepted as consensus.”
6. “I feel we have no clear sense of unity in the group. We need to do more work before consensus can be achieved.”

Consensus is achieved if all Collaborative members present indicate that they are at levels 1 through 4. A quorum of Collaborative members is required to achieve consensus.

When consensus is tested and a Collaborative member is at level 5 or 6, that person must clearly articulate his or her concern to the larger group, and if possible, work to develop a solution and present that solution to the Collaborative for the Collaborative’s consideration. The Collaborative may continue with this procedure until consensus is achieved or the Collaborative can decide to not move forward with a particular decision or recommendation.

If consensus is not achieved for a particular recommendation, the recommendation can still be forwarded to the agency with the proposed project and the level of consensus will be noted (e.g. consensus minus one recreation representative).

### **5.2 MEETING GROUND RULES**

The Collaborative is committed to working within the following meeting ground rules, demonstrating respect for each other by:

- Listening actively
- Listening honorably and respecting each other
- Giving the other person permission to openly speak his or her mind
- Avoiding attacking remarks, name calling, etc.

- Not interrupting
- Not conducting side conversations

## 6. RECOMMENDATIONS FROM THE PREVIOUS COLLABORATIVE

The Collaborative was preceded by the Ten Mile Watershed Collaborative Committee (Previous Collaborative), which was created by Resolution Number 19605 of the Helena City Commission on September 8, 2008. The Previous Collaborative submitted its recommendations to the Helena City Commission on June 17, 2009 (Appendix B).

In order to bring forward and honor the work of the Previous Collaborative, the current Collaborative decided to form the 2009 Report Subcommittee at their May 14, 2015 meeting. At the October 7, 2015 meeting, the 2009 Report Subcommittee presented a draft set of the goals, issues, recommendations, and action items that honored the work of the Previous Collaborative. The Collaborative amended and approved that document and decided that it shall exist as living document that reflects the current goals, issues, recommendations, and action items of the Collaborative. They also decided that the document will be used to provide regular updates to the Helena City Commission, state and federal agencies, and other stakeholders.

Table 3 is the latest version of the goals, issues, recommendations, and action items of the Collaborative, which was last amended on October 20, 2015. The Collaborative used Table 3 as the basis for developing several of their comments on the Tenmile South Helena Project DEIS.

**Table 3. Collaborative goals, issues, recommendations, and action items.**

Goals	Issues	Recommendations	Action items
Provide for present and future public safety with regards to wildfire	<ul style="list-style-type: none"> <li>• Rimini residents at risk</li> <li>• Area workers, users, and firefighters at risk</li> <li>• Residents and other stakeholders are often unaware of the potential impacts of wildfire on public and private property</li> <li>• Residents and other stakeholders are often unaware of the importance of preemptive wildfire mitigations</li> </ul>	<ul style="list-style-type: none"> <li>• Protect the community of Rimini through community outreach and engagement, development of defensible and survivable space around structures, and the establishment of evacuation routes in the event of major fire.</li> <li>• Build public support for wildfire safety by engaging stakeholders. They must not only understand the risks, but must support mitigation efforts.</li> <li>• Work among community members and neighborhoods to encourage small group gatherings.</li> <li>• Invite Sean Logan and Pat McKelvey (or others) to speak to small neighborhood groups about mitigation, evacuation plans, and post-fire impacts.</li> </ul>	<ul style="list-style-type: none"> <li>• Designate evacuation routes</li> <li>• Develop evacuation plan and routes, including a maintenance agreement</li> <li>• Implement a safety education program – may need to review private property mitigation efforts from prior to 2009</li> <li>• Prioritize defensible space around human structures/assets, sensitive soils, and mine wastes</li> <li>• Prioritize areas for survivable treatments, which involves assessments of structural details</li> <li>• Utilize a community-led program involving local leaders</li> <li>• Tri-County FireSafe Working Group should take the lead and secure the needed funding</li> <li>• Ask the City to assess the potential for burying power lines to reduce fire hazard and road design issues (Update: Northwestern Energy has done some work in this area to mitigate risk of trees falling on power lines and starting fires, as well as risks to infrastructure in case of a wildfire, i.e. poles at risk. Northwestern Energy placed 7,831 ft. of delivery lines underground in Rimini.)</li> <li>• USFS should cross-reference treatment projects with evacuation routes</li> <li>• Recommend new tank transfer. (Update: the new 40,000 gallon tank below Rimini is owned by the USFS and Baxendale has a 30 year conditional use permit for the tank.)</li> </ul>
Protect City water delivery infrastructure	<ul style="list-style-type: none"> <li>• At risk from wildland fire</li> <li>• At risk from mine waste</li> <li>• Limited funds for improvement</li> <li>• Antiquated, vulnerable design</li> <li>• Mixed land ownership</li> <li>• Post-wildfire repair</li> <li>• Vegetation close to flume</li> <li>• Land exchanges in project area</li> </ul>	<ul style="list-style-type: none"> <li>• Take necessary actions to protect the City’s water supply infrastructure by removal of vegetation in proximity to structures and eventual replacement of the fire vulnerable parts of the flume with metal pipe.</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to support implementation of flume proposal</li> <li>• Continue to prioritize defensible/survivable space around city water supply infrastructure</li> <li>• Continue to support the City's involvement in fire suppression, prevention, and response planning and implementation</li> <li>• Remain involved in land exchanges within the project area, especially City / USFS exchanges such as Travis Meadows (possible) and area at the head of Tenmile Creek.</li> </ul>

**TENMILE SOUTH HELENA FOREST RESTORATION COLLABORATIVE COMMITTEE**  
**Comments for Tenmile South Helena Project DEIS**

<b>Goals</b>	<b>Issues</b>	<b>Recommendations</b>	<b>Action items</b>
Honor and protect the nature of our IRAs and provide recommendations for watershed road density	<ul style="list-style-type: none"> <li>Ability to suppress wildfire</li> <li>Access for mitigation of potential wildfire effects on watershed</li> <li>Impacts of mitigations and wildfire on recreation, fisheries, and wildlife</li> </ul>	<ul style="list-style-type: none"> <li>Seek to balance the protection of Roadless area values with needs for access to enable wildfire mitigations</li> </ul>	<ul style="list-style-type: none"> <li>Distinguish between proposed wilderness areas and IRAs and evaluate recommendations for fuels mitigation and treatments based, in part, on that distinction</li> <li>Make specific recommendations to the USFS regarding how to accomplish wildfire mitigation goals in IRAs while protecting Roadless area values</li> </ul>
Provide recommendations for landscape-scale treatment of watershed	<ul style="list-style-type: none"> <li>Fuels buildup</li> <li>Increased risk of landscape-scale, intense wildfire that risks public safety, water quality, soil retention, recreation, and other values</li> <li>Pine beetles increase the risk of hot ground fire in downed timber resulting in damage to soil</li> </ul>	<ul style="list-style-type: none"> <li>Carefully use prescribed fire, including pre-fire fuels reduction and rearrangement, where appropriate (this represents the best strategy to minimize the risks of an uncontrollable fire in the project area)</li> </ul>	<ul style="list-style-type: none"> <li>Endorse Mark Finney's periodic 20-40% of landscape treatment model</li> <li>Endorse Mark Finney's view that all units treated require the use of prescribed fire</li> <li>Build public support through high visibility demonstration projects</li> <li>Project design should be synergistic with goals of wildlife habitat improvement</li> <li>Mark Finney should be directly involved in planning</li> <li>No new permanent roads</li> <li>Develop a Memorandum of Understanding between the USFS and the Collaborative</li> <li>Outreach to Resource Advisory Collaboratives</li> <li>Use prescribed fire in both Roadless and roaded areas</li> <li>No new roads, temporary or otherwise, will be constructed in IRAs; however, firebreaks may be constructed if needed</li> <li>Mechanically treat roaded areas and then determine if mechanized treatments in IRAs are acceptable</li> </ul>
Protect and improve water quality	<ul style="list-style-type: none"> <li>Loss of water for water customers</li> <li>Increased cost of water treatment</li> <li>Failing septic systems</li> <li>Reduced stream flows effects on fisheries</li> <li>Arsenic, cadmium, lead, copper, zinc contributions to Tenmile creek from mining wastes and mine discharges</li> </ul>	<ul style="list-style-type: none"> <li>Consider in stream flow augmentation via 6<sup>th</sup> diversion near water treatment plant. This would benefit fisheries without altering water supply.</li> <li>Responsible agencies should continue monitoring water quality on Tenmile Creek</li> <li>Keep Collaborative informed of water quality monitoring</li> </ul>	<ul style="list-style-type: none"> <li>Develop cooperative, interagency management agreement</li> <li>Develop defensible space around inactive mine sites</li> <li>Identify sites at special risk for degrading water quality due to wildfire</li> <li>Develop mitigation strategies for special risk sites</li> <li>Discuss the potential to include Tenmile Creek in final Superfund remedy with the EPA and Montana DEQ</li> <li>Request agencies to include collaborative in annual water quality reviews</li> </ul>

**TENMILE SOUTH HELENA FOREST RESTORATION COLLABORATIVE COMMITTEE**  
**Comments for Tenmile South Helena Project DEIS**

<b>Goals</b>	<b>Issues</b>	<b>Recommendations</b>	<b>Action items</b>
Promote potential for restoration of a viable fishery and of wetlands	<ul style="list-style-type: none"> <li>• Water quality and quantity to support a fishery</li> <li>• Lack of management agreements</li> <li>• Need for ongoing monitoring of fish and aquatic organisms population density and species diversity</li> </ul>	<ul style="list-style-type: none"> <li>• Support efforts to continue monitoring and review data</li> </ul>	<ul style="list-style-type: none"> <li>• Develop joint management agreement between all responsible agencies</li> <li>• Engage in discussions with responsible agencies and participate in briefings</li> </ul>
Protect ecosystems from the effects of high intensity wildfire and mitigate the potential damage to ecosystems by major wildfire.	<ul style="list-style-type: none"> <li>• Damage from wildfire on a multitude of values</li> <li>• Increased rates of erosion</li> <li>• Fuels buildup</li> <li>• Human ignitions</li> </ul>		<ul style="list-style-type: none"> <li>• Thin fuels</li> <li>• Evaluate potential projects</li> <li>• Utilize spatial arrangement/location of treatments to modify wildfire behavior</li> <li>• Develop defensible space around mine sites</li> <li>• Develop defensible space around and within Rimini</li> <li>• Utilize prescribed burning with proper site preparation and prescription</li> <li>• Develop strategies for managing wildfire</li> <li>• Enhance local firefighting capabilities</li> <li>• Mitigate risk to power lines</li> </ul>
Protect and improve long-term quality of wildlife habitat	<ul style="list-style-type: none"> <li>• Too many roads, including 4 wheel creep off of designated roads</li> <li>• Beetle caused loss of lodgepole and ponderosa habitat</li> <li>• New habitat created through beetle kill</li> <li>• Loss of thermal hiding cover</li> <li>• Significant wildlife corridor zone</li> <li>• Natural ebb and flow of habitat</li> <li>• Cumulative impacts of human activities</li> <li>• Dollars for habitat restoration</li> <li>• Effect of travel management on wildlife habitat</li> </ul>	<ul style="list-style-type: none"> <li>• Work with agencies to promote 1800-TIP-MONT as a means of reducing illegal off-road use</li> <li>• Minimize the fragmentation effects of projects in the area on habitat</li> <li>• If conflicts between fire mitigation and habitat conservation strategies develop, use interdisciplinary approach to resolve the conflict</li> </ul>	<ul style="list-style-type: none"> <li>• Work with the agencies and the local community</li> <li>• Identify linkage zones and develop habitat conservation strategies</li> <li>• Promote coordination between agencies</li> </ul>

**TENMILE SOUTH HELENA FOREST RESTORATION COLLABORATIVE COMMITTEE**  
**Comments for Tenmile South Helena Project DEIS**

<b>Goals</b>	<b>Issues</b>	<b>Recommendations</b>	<b>Action items</b>
<p>Continue to educate and to build, promote, and maintain relationships with the public, agencies, and stakeholders</p>	<ul style="list-style-type: none"> <li>• Difficulties in information sharing and coordination among agencies</li> <li>• Agencies can save time, money, and effort in wildfire mitigation through coordination (i.e. - temporary roads created for mine treatments may be used for fire treatment)</li> <li>• Misunderstandings of forest management practices, forest ecology, and watershed management (i.e. - prescribed burning and smoke, mechanical and hand treatments, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• Develop specific timeframes for review of treated and untreated units</li> <li>• Receive updates from agencies each January regarding upcoming projects and work plans, and ongoing monitoring (water quality, air quality, etc.)</li> <li>• Review changes in the project area and impacts from projects each year (i.e. new road for Rimini, landscape-wide changes such as beetle kill and floods, road density, human population changes, and wildlife population changes)</li> <li>• Improve and make greater efforts in public education and outreach regarding mitigation strategies, methods, and treatments, especially regarding prescribed fire, road decommissioning, and other relevant forest issues</li> </ul>	<ul style="list-style-type: none"> <li>• Notify the public of Collaborative meetings</li> <li>• Post relevant public information on the Tenmile webpage</li> <li>• Work cooperatively with agencies in outreach and education efforts</li> <li>• Provide materials and outreach ideas to reach a broader audience through stakeholder agencies</li> <li>• Develop a strategy for informing the public of recommendations and decisions by the Collaborative</li> <li>• Establish routine briefings with all agencies to encourage information sharing, coordination, and public involvement and outreach</li> </ul>

## 7. PROJECTS IN THE TENMILE SOUTH HELENA AREA

Table 4 shows the ongoing and planned projects that the Collaborative has identified for the Tenmile South Helena area. This information, along with information about past projects in the area, is important for assessing the cumulative impacts of any project occurring in the project area. The Council on Environmental Quality defines cumulative impacts as,

The impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a time period. (Sec. 1508.7)

Table 4 should be reviewed and updated periodically by the Collaborative and should be revised to include past projects to ensure that it is as comprehensive as possible, and allows the Collaborative and agencies to better consider cumulative impacts of proposed projects.

**Table 4. Projects identified within the Tenmile South Helena area.**

Agency	Project Name	Project Description	Project Point of Contact	Project Status
EPA	Landmark	Hauling approximately 12,000 cu yards of mine waste from a residential property in Landmark Subdivision to Luttrell Repository via Minnehaha. Road closure will be in place on Minnehaha		Starting after July 4, 2015
EPA	Bunker Hill Group Mines and National Extension	Mine waste from National Extension and 11 individual sites located in Bunker Hill vicinity to Luttrell Repository via Banner Creek and Peerless Jenny Road. Road closure will be in place on Banner Creek and Peerless most of the summer.		
EPA		Five monitoring wells being removed.		
EPA	Future removal and remedial work			
USFS & DNRC	Red Mountain Flume Chessman Reservoir Project	This includes hand and mechanical fuels reduction work on approximately 500 acres.		
USFS		Obliterating user created routes in lower Tenmile primarily created by firewood cutting and dispersed camping.		
USFS		Installing fence to keep wandering cattle out of Tenmile Creek and doing some trail and		

**TENMILE SOUTH HELENA FOREST RESTORATION COLLABORATIVE COMMITTEE**  
**Comments for Tenmile South Helena Project DEIS**

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	developed recreation maintenance in the lower Tenmile drainage.	
USFS	Miscellaneous activities in Tenmile watershed and South Helena, such as hazardous mine closures, road and trail maintenance, and weed spraying.	
USFS	Slashing, prescribed burning, weed spraying, and tree planting ongoing in the Clancy Unionville project area of South Helena.	
Lewis & Clark County, Federal Highway Administration	Replacing bridges and paving lower Tenmile Road. This project includes riparian work and a revegetation plan.	
NRCS, DNRC, Tri-County Fire Working Group	Working with landowners to complete vegetation projects on private property. Primarily focused on fuels reduction.	
City of Helena	Fuel treatments, by hand, in the vicinity of Scott Reservoir. Also, some finishing work on Minnehaha parcels.	Starting early to mid-July, 2015

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## 8. COLLABORATIVE STRATEGY FOR COMMENTING ON THE DEIS

Chairman Cohenour and Ecosystem Research Group (ERG) suggested a strategy for commenting on the DEIS at the January 13, 2016 meeting of the Collaborative. The Collaborative provided feedback, which was incorporated into the following strategy.

Upon the online release of the DEIS, each Collaborative member began by reading Chapters 1 and 2, focusing on the purpose and need, the design criteria, the proposed action, and the descriptions of the alternatives. Collaborative members then began reading the following resource areas in Chapter 3 (these assignments did not restrict Collaborative members from commenting on other resource areas):

Chairman Joe Cohenour	Wildlife, IRAs
Co-vice Chair Mike Bishop	Forested Vegetation, Soils, Hydrology
Co-vice Chair Jordan Alexander	Fire and Fuels, Air Quality
Commissioner Cory Kirsch	Economics
Commissioner Mike Murray	Heritage and Cultural Resources
Ron Alles or Brad Langsather	Transportation, Forested Vegetation
Jeff Chaffee	Hydrology, Fire and Fuels, Air Quality
Angie Grove	Recreation, Scenery
Gary Marks	IRAs, Forested Vegetation
Eleanor Morris	Botany, Fisheries, Transportation
Doug Powell	Noxious Weeds, Botany, IRAs, Wildlife

Collaborative members were encouraged to reach out to the stakeholders they represent and to consider including their views into the comments that they submitted. Collaborative members were also encouraged to reference the Collaborative's Table of Recommendations (Table 3) and consider how their comments might support the agreed upon Collaborative goals.

At the January 13, 2016 Collaborative meeting, the Collaborative identified IRAs, wildlife, fuels and fire, transportation, forested vegetation, and hydrology as resource areas that would require a lot of 'heavy lifting'; therefore, the following informal study groups were formed around those resource areas. The formation of these study groups did not preclude any Collaborative member from attending any gathering of a study group, nor did it preclude the formation of any other study groups.

Chairman Joe Cohenour and Doug Powell	Wildlife study group
Chairman Joe Cohenour, Doug Powell, and Gary Marks	IRA study group
Co-vice Chair Jordan Alexander and Jeff Chaffee	Fuels and Fire study group
Co-vice Chair Mike Bishop and Jeff Chaffee	Hydrology study group
Co-vice Chair Mike Bishop, Brad Langsather, and Gary Marks	Forested Veg. study group
Brad Langsather and Eleanor Morris	Transportation study group

Collaborative members were encouraged to reach out to one another when forming their comments, especially if they think that a certain Collaborative member may not find the comment acceptable. It was hoped that this would reduce the amount of time needed to discuss and deliberate on comments at Collaborative meetings. Also, Collaborative members were encouraged to prioritize their commenting time by focusing first on the areas that were most important to the Collaborative.

Collaborative members generated their comments in the following format:

- (1) They identified the key issue that the comment is addressing
- (2) They clearly and concisely articulate the problem
- (3) They provided a detailed comment on the problem, including page numbers and site specific location information
- (4) They proposed a solution that supported the purpose and need of the project and the goals of the Collaborative
- (5) They provided references to help support the comment

ERG compiled all of the Collaborative's comments into one document and sent them back out to the wider group of stakeholders for review. Collaborative members were encouraged to read the compiled comments thoroughly and to note any changes they wanted to see made. Stakeholders were encouraged to submit written feedback on the compiled comments for the Collaborative to review.

The Collaborative then met to test consensus on their comments. When consensus was tested, if the Collaborative did not gain consensus on a particular comment, those Collaborative members that did not find the comment acceptable were asked to make a brief statement describing why it was unacceptable and to propose changes to the comment that would make it acceptable to them. The Collaborative members that drafted the comments that did not achieve consensus were asked to revise their comment in consultation with the dissenter(s).

The Collaborative met again, one week later. At the beginning of this meeting the Collaborative was asked to reflect on the consensus testing process used at the previous meeting and to provide feedback. The Collaborative decided that as long as a quorum is present as noted in the Consensus-based Decisions and Ground Rules Agreement, a Collaborative member could abstain from a vote and a comment could still achieve consensus with the remaining quorum. The Collaborative then began testing consensus on all of the new comments and revised comments. Comments that did not achieve consensus were then discussed and revised in small groups and presented again for a final round of consensus testing. Those comments that did not achieve consensus but that had only one dissenting vote were still recorded and are included in the comment section of this report, with the level of consensus noted (e.g. consensus minus one – conservation representative).

ERG then compiled all of the consensus and consensus minus one comments into this report. This report will be sent out to the wider group of stakeholders, technical resources, and the media for comment before a meeting is held to publicly present and receive comments on this report. After the public meeting, Chairman Cohenour will deliver the final comment document to the USFS before the deadline for receiving comments has been reached.

## 9. COLLABORATIVE COMMENTS ON DEIS

The following comments achieved consensus or consensus minus one by the Collaborative members at the March 3 and March 9, 2016 Collaborative meetings. The comments have been organized by resource area.

### 9.1 FIRE AND FUELS

1. On pages 156 through 207 of the DEIS, the HNF clearly articulated the purpose and need for utilizing mechanized equipment, where feasible, to manipulate vegetation within shaded fuel breaks proposed within the Jericho IRA on the Alternative 2 and Alternative 3 maps. It is not practical to complete forest fuel manipulation activities associated with the shaded fuel breaks proposed within the Jericho IRA without the use of mechanized equipment. The Collaborative has a responsibility to acknowledge and support the recommendations of resource professionals employed by the HNF. The Collaborative therefore recommends that the HNF utilizes mechanized equipment to accomplish vegetative manipulation activities associated with the shaded fuel breaks proposed for implementation within the Jericho IRA. This comment addresses the Collaborative's Table of Recommendations (Table 3) goal to "protect and improve water quality."
2. The Collaborative suggests that the HNF commence treatments on the periphery of IRAs or in the private land buffers before beginning work on the interior of the IRAs. The Collaborative believes that this will give buffer-adjacent landowners primary protection from the direct effects of wildfire.
3. If Alternative 3 is selected, the Collaborative recommends that the HNF extend prescribed fire treatments west and north of Treatment Area (TA) 159 and provide a more defined buffer for private property in TA 143a. These recommendations should provide for greater public and fire fighter safety.
4. The Collaborative would like to see the anticipated post-project maintenance of treatments required to maintain watershed health beyond the life of this project discussed in the DEIS.
5. The Collaborative would like to see a scientifically modeled risk of wildfire encroachment upon the City of Helena based on fuels, air movement, etc., emphasized in the DEIS. They would also like to see the greater risk associated with fire starts in areas west and south of Helena and Unionville emphasized.
6. [This comment achieved consensus minus one (citizen-at-large representative)] The Collaborative believes that the overall treatments proposed in Alternative 3 are too limited to create a mosaic of vegetation and fuel structure that is resilient to disturbance. The Collaborative recommends that a new alternative combine elements of Alternative 2 with Alternative 3, specifically adding prescribed burning units outlined in Alternative 2 for the Jericho IRA into the new alternative and incorporating mechanical treatment options in the recreational trail corridors within the Jericho Mountain IRA.

### 9.2 HYDROLOGY

1. The Collaborative would like to see the impacts of Alternatives 1, 2, and 3 on erosion and sedimentation analyzed and compared in greater detail, especially regarding turbidity and its impacts on fish and aquatic organisms and Helena's water supply.

2. Unless mentioned elsewhere in the DEIS, the Collaborative feels that there is little acknowledgement in the hydrology section of the importance of the Ten Mile watershed to Helena's drinking water supply. The Collaborative recommends that the USFS more clearly identify the risks of wildfire to the watershed in the introduction to the hydrology section and explain the purpose and need for an action alternative to reduce that risk. The Collaborative recommends that, once introduced, this purpose and need should be developed in detail in the affected environment portion of the Hydrology section by explaining the importance of a healthy forest to Helena's drinking water.

### **9.3 PROTECTION FOR THREATENED, ENDANGERED, AND SENSITIVE WILDLIFE SPECIES**

1. The Collaborative did not see goshawk nests in TA 159 and 142a (west of Colorado Gulch) identified in the DEIS, though they are known to nest there. These nests may be disturbed by planned buffer zone treatments. The Collaborative recommends that the Forest Service identify the locations of goshawk nests in TA 159 and 142a.

### **9.4 PUBLIC SAFETY**

1. The Collaborative recommends that treatments as shown on the Alternative 2 map as well as TAs 131, 132, 98a, 98c, 98d, 118, and 85c, be implemented. Corral Gulch gets heavy traffic from the public, especially in relation to Park Lake recreation, and these TAs pose a risk to public safety in their current condition. The Collaborative also believes that the treatments in Alternative 2 for Corral Gulch give better fire protection to local landowners.
2. The Collaborative recommends that treatments prescribed for TA 90a and b under Alternative 3 be extended to include TA 173a and 173b from Alternative 2. If need be, this extension could include helicopter logging with adequate slash management. The Collaborative feels that implementing these treatments will improve conditions for public safety.
3. The Collaborative recommends that treatments along the Montana Continental Divide Trail (CDT) (Trail #337), Road 1863, Trail #375, and the Switchback Trail (Trail #348) should be high priority treatments and should be conducted quickly and safely to assure uninterrupted use of these areas. The Collaborative cites these trails as getting high levels of recreational use.
4. The Collaborative recommends that the Corral Gulch TAs (85, 98, 118, 131, and 132) from Alternative 2 be added to Alternative 3. The Collaborative recommends that mechanized equipment be used to treat these TAs, where appropriate. The Collaborative believes that the treatments in Alternative 2 for Corral Gulch give better fire protection to local landowners.
5. The Collaborative recommends that if Alternative 3 is selected, Alternative 2 TAs 7a, b, and c in the Jericho IRA be added to Alternative 3, but that the treatments be done without heavy mechanized equipment. These treatments will allow for better buffering of wildfires that start in the MacDonald Pass or CDT area.
6. The Collaborative supports the use of heavy equipment to treat the private land buffers, as it gives landowners an economical option to treat the WUI.

7. [This comment achieved consensus minus one (citizen-at-large representative)] The Collaborative recommends that the USFS use heavy machinery to clear TA 8r in Alternative 3 to the private property cutoff.
8. [This comment achieved consensus minus one (citizen-at-large representative)] The Collaborative believes that there is a public safety risk associated with falling timber as well as with volunteers attempting to remove dangerous trail obstructions. The Collaborative feels that Alternative 2 does the best job of promoting public safety in the project area. The Collaborative recommends not selecting Alternative 1 citing public safety reasons.
9. [This comment achieved consensus minus one (citizen-at-large representative)] Alternative 3, which allows for only hand treatments along Trail 337, Road 1863, Trail 375, and Trail 348, creates public safety issues and limits visual enjoyment of the trail corridor. Therefore, the Collaborative recommends the use of mechanical treatments along these trail corridors and along Road 1863 in the Jericho Mountain IRA.
10. [This comment achieved consensus minus one (citizen-at-large representative)] The Collaborative recommends using heavy machinery to clear the CDT in TA 182 in Alternative 3 and suggests that allowing heavy machinery to clear the CDT will make the job faster, more economical, and safer, while still maintaining the trail's characteristics.

#### **9.5 RECREATIONAL USE**

1. The Collaborative recommends relocating recreational use off of the current Brooklyn Bridge road prism during implementation and keeping the relocated trail after the project is completed.
2. The Collaborative feels that recreational use on the road prism between Trails 337, 375, and 348 would be restricted during the implementation of proposed treatments of the Jericho Mountain IRA. Therefore, the Collaborative recommends relocating trail use from the current road prism to assure uninterrupted use. As noted in the DEIS, trail segments currently using a road prism that could be used during implementation should be relocated to a more desirable location (p. 42). Also, on page 42, it is noted that roads that also serve as a designated trail system can be restored to a condition that ensures recreation values are enhanced.

#### **9.6 IRAS**

1. The Collaborative recommends protecting Roadless area values in the project area, especially in the Lazyman IRA that has previously been proposed for wilderness designation. As such, the Collaborative recommends that the USFS not use heavy, mechanized equipment (skidders, forwarders, etc.) in the Lazyman IRA, with the exception of private land buffers.

#### **9.7 TRANSPORTATION**

1. The Collaborative feels that some current road culverts in the project area are too small for storm and flood events and for fish and aquatic passage. The Collaborative feels that it is reasonable to expect more storm events in the future; therefore, they recommend designing the infrastructure to

accommodate large flows. If Alternative 2 is selected, the Collaborative recommends increasing stream crossing improvements to accommodate 100-year flow events (p. 809). Please note that Alternative 3 already calls for stream crossing improvements to accommodate 100-year flow events.

2. The DEIS states that Alternative 2 has fewer miles of haul routes within 150 to 300 feet of streams than Alternative 3, resulting in fewer high risk road reaches in riparian areas exposed to truck traffic (p. 702). The Collaborative recommends quantifying and identifying the differences between Alternative 2 and 3 with regard to haul routes within 150 to 300 feet of streams.
3. Two existing roads, Forest Service Road (FSR) 299-I1 and 299-E1, utilized by the City of Helena Water Department for maintenance of the Red Mountain Flume area are slated for decommissioning under both Alternative 2 and 3. In order to facilitate the future maintenance of the Red Mountain Flume, the City requires the functional retention of FSR 299-I1 and 299-E1. Therefore, the Collaborative recommends maintaining gated control of FSR 299-I1 and 299-E1 and removing both roads from the list of roads scheduled for decommissioning under Alternatives 2 and 3. The Collaborative cites their goals of protecting city water delivery infrastructure and protecting and improving water quality as the basis for this comment.
4. [This comment achieved consensus minus one (citizen-at-large representative)] The Collaborative recommends utilizing the existing road infrastructure located within or adjacent to IRAs to facilitate access associated with the mechanized harvest and removal of vegetation scheduled for management or the mechanical felling/manipulation of the aforementioned vegetation. The Collaborative believes that this will reduce soil damage associated with prescribed burn activities proposed for implementation within the IRAs under both action alternatives. The Collaborative cites their goal of protecting and improving water quality as the basis for this comment.

## **9.8 WATERSHED PROTECTION**

1. The Collaborative feels that TA 37 under Alternative 3 does not do enough to protect the Tenmile watershed; therefore, the Collaborative recommends expanding treatments in TA 37 under Alternative 3 to decrease risks to the Tenmile watershed.
2. In response to the presence of sensitive soils within the project area, the Collaborative would like to see the USFS describe the anticipated post-project maintenance of roads that will be required to maintain watershed health beyond the life of this project described in this DEIS. Please use Table 169 as a reference for this comment.

## **9.9 AIR QUALITY**

1. [This comment achieved consensus with citizen-at-large representative abstaining] The Collaborative feels that the introduction to the air quality section should clearly articulate the purpose for this proposed project and set the stage for how air quality will be impacted depending on the alternative chosen by the USFS (p. 208). The Collaborative recommends that the USFS better explain in the introduction to the air quality section the purpose and need for this project in terms of managing impacts

on air quality. In paragraph 6 on page 208, the Collaborative recommends that the USFS state that catastrophic wildfire leads to levels of pollutants that exceed state and federal ambient air quality standards and are hazardous to human health and the environment, along with creation of nuisance conditions. The Collaborative would like to point out that there are examples of extremely high levels of air quality impacts during wildfire events available from the DEQ; the DEQ submits “exceptional event” exemptions to the EPA for wildfire smoke events that document these impacts.

2. [This comment achieved consensus with citizen-at-large representative abstaining] The Collaborative feels that the introduction to the air quality section should include a discussion of other air pollutants, such as carbon monoxide and carbon dioxide, in addition to particulate matter (PM)<sub>2.5</sub>. While the introduction to the air quality section says that PM<sub>2.5</sub> emissions represent the best quantifiable air quality measurement regarding local impacts (p. 209), there are other significant parameters that affect air quality. In addition, the release of carbon stored in woody materials and soils deserves mention, given the large immediate release of stored carbon via carbon dioxide emissions in a catastrophic wildfire and the longer term impacts of a wildfire on rebuilding the carbon storage that a healthy forest provides. Regarding this comment, the Collaborative references the extensive work that the USFS has done on carbon storage in forests and carbon released during forest fires. The Collaborative can supply these specific references upon request.
3. [This comment achieved consensus with citizen-at-large representative abstaining] The Collaborative feels that the use of the average daily PM<sub>2.5</sub> “concentrations” in Table 68 taken from the Rossiter Pump House site, which are used to represent background conditions at the project site, is not appropriate (p. 210 and 211). The Rossiter Pump House site is in the middle of the Helena valley and sited to measure ambient air quality in an area where people live and work. The project site is not in or adjacent to a populated area, resulting in more pristine air quality than that at the Rossiter Pump House site. The Collaborative suggests that the PM<sub>2.5</sub> concentrations listed in Table 69 from the Gates of the Mountains monitoring site are more representative of background air quality in the project area. Note the very low concentration of PM<sub>2.5</sub> at the Gates of the Mountains monitoring site during the winter versus the higher background in the Helena valley during winter. There is a similar pattern for spring. The summer concentrations are relatively close together, arguably showing the influence of regional wildfire smoke on both sites. The Collaborative suggests that, because the modeled impacts of prescribed fire and pile burning do not approach ambient air quality standards, this issue will not draw interest from regulatory agencies. However, if ignored, an opportunity to point out to the public the predominant risk to air quality that comes from catastrophic wildfire is missed.
4. [This comment achieved consensus with citizen-at-large representative abstaining] The Collaborative feels that the air emissions from Alternative 1 are not presented in a form that explains the risk to the public. Recall that the purpose of this proposed project is to prevent or mitigate impacts of catastrophic wildfire. The MacDonald Pass Fire in 2009 was well short of catastrophic. The Collaborative feels that the Warm Springs Fire in the Elkhorn Mountains in 1988, which blew up and burned thousands of acres in one night during catastrophic fire conditions, is a better example. The DEIS needs to inform

the public of the risks of a major wildfire event. Therefore, focusing on relatively small fires in the area is less informative. The calculated air emissions from wildfires in Table 70 are based on acres burned (p. 213). The Collaborative feels that it is okay to explain the emission factors to be used for wildfire analysis. However, the total potential emissions, based on a worst case scenario of a major fire blow up need to be shown. The public cannot be expected to do the calculations and assess the impacts, that is the purpose of the DEIS. The Collaborative suggests that the amount of acreage that could be burned under catastrophic wildfire conditions in a 24 hour period should be the basis for the estimates in Table 70 (p. 213).

5. [This comment achieved consensus with citizen-at-large representative abstaining] The Collaborative feels that the impacts section for Alternative 1 should address the potential carbon monoxide emissions from a catastrophic wildfire event and relate the purpose and need for this project (to prevent and mitigate such an event). By managing fuels and limiting the opportunity for a major burn of the area, we are keeping carbon in woody materials in the soils and thereby lessening the impacts on emissions related to the greenhouse effect and climate change. The Collaborative recommends that the USFS calculate carbon dioxide emissions from a catastrophic fire, and then do the same for management Alternatives 2 and 3. The Collaborative believes that this will demonstrate a difference between alternatives. Altering carbon dioxide emissions is an area where this project will have benefits for overall forest health and the environment.
6. [This comment achieved consensus with citizen-at-large representative abstaining] The Collaborative feels that, in the conclusion section of the Air Quality section, the important distinction between implementing the project versus no management on air quality is clarified (p. 217 and 218). The use of language such as “extended duration health hazards” is correct when speaking of uncontrolled major wildfire. By implementing thoughtful management, we lessen the likelihood of those hazards. The Collaborative suggests that the USFS make the point early and often in the air quality section, not just in the conclusion.

#### **9.10 SOCIOECONOMIC IMPACTS**

1. [This comment achieved consensus minus one (citizen-at-large representative)] The Collaborative feels that closures on Trail 337, 375, and 348 could impact local tourism and local businesses. Without using mechanical treatments in Alternative 3, trail closures could be lengthier. Therefore, if Alternative 3 is selected, the Collaborative recommends that the USFS allow mechanical treatments for Trail 337, 375, 348, and Road 1863. The Collaborative further recommends that treatments in these locations be done outside of the July 1 through September 1 season, which is the window of time used by the Trail Rider, Bike Helena, and Helena Tourism Alliance to promote economic tourism in the Helena area.

# **RESOLUTIONS OF THE CITY OF HELENA, MONTANA**

## **RESOLUTION NO. 20106**

### **A RESOLUTION ESTABLISHING THE TENMILE/SOUTH HELENA FOREST RESTORATION COLLABORATIVE COMMITTEE**

**WHEREAS**, the Helena City Commission is responsible for public safety, environmental protection, protection of public water supply, and preservation of the general quality of life within the City of Helena; and

**WHEREAS**, the Helena City Commission desires to form a collaborative effort to consider management opportunities in the Tenmile Watershed and the City of Helena's wildland urban interface (WUI) for mitigation of fire risk and to reduce the potential for damage to the City's public water supply infrastructure; and

**WHEREAS**, the Helena City Commission understands there are multiple stakeholders and landowners in the watershed and WUI with varied interests and concerns; and

**WHEREAS**, the City Commission and other stakeholders and landowners desire to create a committee to collaboratively review proposed projects within the watershed and WUI in relation to appropriate vegetation management, fire mitigation, watershed, and other resource and recreation management.

//

# RESOLUTIONS OF THE CITY OF HELENA, MONTANA

**Res. No. 20106**

NOW, THEREFORE, BE IT RESOLVED BY THE COMMISSION OF THE CITY OF HELENA, MONTANA:

**Section 1.** A Tenmile/South Helena Forest Restoration Collaborative Committee is hereby established and shall be comprised of the following eleven (11) individuals:

Two (2) representatives from Conservation organizations

One (1) representative from local recreational user organizations

Two (2) representatives from commercial use organizations such as timber, biofuels, mining, and livestock industries

One (1) representative or designee from the City of Helena governing body

One (1) representative or designee from the Lewis and Clark County governing body

One (1) representative or designee from the Jefferson County governing body

One (1) representative from the fire community

Two (2) Citizens at large from the greater Helena area

**Section 2.** State and federal agencies and representatives from other watershed groups may serve as technical advisors to the Tenmile/South Helena Forest Restoration Collaborative Committee and may be comprised of the following:

Montana Department of Natural Resources (MT DNRC)

Montana Fish, Wildlife & Parks (MT FWP)

Montana Department of Environmental Quality (MT DEQ)

US Department of Interior - Bureau of Land Management (BLM)

# RESOLUTIONS OF THE CITY OF HELENA, MONTANA

**Res. No. 20106**

US Department of Agriculture - Forest Service (USDA FS)  
US Department of Agriculture - Natural Resources  
Conservation Service (USDA NRCS)  
US Environmental Protection Agency (EPA)  
Lake Helena Watershed Group  
Montana Forest Restoration Committee  
Lincoln Restoration Committee

\*Additional community representatives may be invited to participate based on recommendations of the above mentioned representatives.

**Section 3.** The Tenmile/South Helena Forest Restoration Collaborative Committee will work to fulfill the following objectives:

**A.** Provide recommendations to state and federal agencies on projects being proposed in the Tenmile municipal watershed and South Helena area. This may include watershed restoration, vegetation management, wildfire mitigation, mine reclamation, recreation, and other projects;

**B.** Identify potential project design and implementation issues and seek solutions early in the site selection and project planning processes; and

**C.** Offer the agency input/knowledge regarding the potential effects of a proposed action or activity.

**Section 4.** The Tenmile/South Helena Forest Restoration Collaborative Committee will terminate three (3) years from the date of this resolution unless otherwise extended by the Helena City Commission.

# RESOLUTIONS OF THE CITY OF HELENA, MONTANA

**Res. No. 20106**

PASSED AND EFFECTIVE BY THE COMMISSION OF THE CITY OF  
HELENA, MONTANA, THIS 21<sup>st</sup> DAY OF JULY, 2014.

/James E. Smith  
MAYOR

ATTEST:

/S/ Debbie Havens  
CLERK OF THE COMMISSION

**Ten Mile Watershed Collaborative Committee  
Recommendations to City of Helena Commission**

**Submitted June 17, 2009**



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## **FACILITATOR'S SUMMARY**

The following documents comprise the work of the Ten Mile Watershed Collaborative Committee (TMWCC), created by City Commission resolution #19605. As facilitator, I worked with the appointees for approximately eight months to implement the resolution's charge to develop recommendations on interrelated issues of importance to the City.

The TMWCC determined it would operate by consensus, meaning all members had to agree for a recommendation to move forward. It made its decisions incrementally – no decisions were considered final until all had been approved. In short, the recommendations that follow are an interrelated “package” that the Committee recommends the City support. Should the Commission choose to support some recommendations, but not others, it is highly likely that the Committee consensus would dissolve.

It is important to note that recommendations include both policy and process, the latter being an ongoing community engagement process initially recommended by the Forest Service, which with the Montana Department of Fish, Wildlife and Parks, served in an advisory (non-voting) capacity to the Committee.

At the Committee's June 8 meeting consensus was made on the enclosed recommendations, an accomplishment made possible by member dedication. Members of the Joint Working Group (subcommittee) are especially deserving of commendation, due to their commitment to meet weekly for most of the eight-month period.

The following documents have been approved by the Committee and comprise their recommendations.

Brian Kahn  
Attorney  
Artemis Common Ground

June 17, 2009

## **BACKGROUND**

The Ten Mile Watershed Collaborative Committee (TMWCC) was appointed by the Helena City Commission Resolution #19605 on September 8, 2008, with the charge to develop recommendations to address interrelated issues in this uniquely important watershed arising from the threat of uncontrolled wildfire, including the City's water supply infrastructure, the water quality that sustains it, and multiple watershed values. The Committee established a goal of completing its work by June, 2009.

A subcommittee, the Joint Working Group (JWG) met on a weekly basis to develop proposed goals, proposed actions and overarching principles. The TMWCC met monthly to gather information and consider/act on JWG recommendations.

The Forest Service and Montana Department of Fish, Wildlife and Parks, as well as city and county agencies, provided important advisory expertise to the Committee's work.

On May 11, 2009 the TMWCC approved six goals:

- Protect and Improve Water Quality and Quantity
- Protect City Water Delivery Infrastructure
- Protect and Improve Long-Term Quality of Wildlife Habitat
- Reduce Damage of Major Wildfire
- Promote Potential for Restoration in Watershed of a Viable Fishery and Wetlands
- Provide for Present and Future Public Safety

It approved multiple recommendations for action items under each goal. Among these were:

- Specific actions to protect the community of Rimini through community outreach and engagement, development of defensible and survivable space around structures, and the establishment of evacuation routes in the event of major fire;
- Actions to protect the City's water supply infrastructure, including the flume delivery system, by removal of vegetation in proximity to structures, and other measures, including recommending eventual modification/replacement of the fire-vulnerable parts of the flume with metal pipe, and to explore the development of a pre-sedimentation basin to minimize the effects of sediment on the Ten Mile water treatment facility.

At its final meeting, on June 8, the Committee adopted recommendations concerning two additional major issues – watershed road density and Landscape-Scale Treatment (LST) of the watershed. The JWG spent considerable time collecting information and developing its recommendations on these important questions.

### Watershed Road Density:

With regard to roads, the Committee considered importance for fire suppression as well as impacts on recreation, fisheries and wildlife. It recommended an overall reduction in road density/miles of road, and a collaborative process to make specific recommendations to the Forest Service. Given timelines for Forest Service decisions, the Committee requested that the City, if it supports the recommendation, communicate promptly with the Forest Service on that issue.

### Landscape Scale Treatment:

The Committee based its recommendations on the following:

- 1) The Forest Plan for the Helena National Forest requires the agency to attempt to suppress all wildfires in the watershed. Over decades, it has successfully done so. This has resulted in a build-up of vegetative fuels beyond what would be present had wildfires not been suppressed, creating increased risk of landscape-scale, intense fire.
- 2) As in much of the Rocky Mountain West, pine beetle infestation is moving through the watershed and there are no practical means of preventing this. When pine trees die, during the period “red” needles remain on the tree, risk of ignition is heightened. However, even live pine trees are easily ignitable.
- 3) If a Ten Mile wildfire ignites with warm temperatures, low moisture content in trees, high winds, suppression of the fire – “stopping it” --it will not be possible. Such a fire has the potential to pose significant risks to public safety, water quality, movement of soils, sedimentation/erosion, recreation and other important values.

Based on the above, the JWG and TMWCC assessed whether actions could be taken to reduce these impacts of an uncontrolled wildfire. Research conducted by the Missoula Fire Sciences Laboratory of the United States Forest Service indicates that advance treatment of portions of a landscape with prescribed fire (carefully planned, limited and controlled, and used under favorable conditions) can substantially alter the behavior of a wildfire that occurs in extreme conditions. Such treatments can modify wildfire behavior by altering the speed of its spread, the direction it burns, the intensity with which it burns. This, in turn, can “buy time”, potentially enabling weather or other conditions to change, enabling suppression or reducing the eventual scale of the burned area.

The TMWCC carefully assessed a range of questions before recommending Landscape-Scale prescribed fire treatment. It fully realizes that there are “no guarantees”, but rather the balancing of factors required by assessing risk and probabilities. It has concluded that the careful use of prescribed fire, including pre-fire fuels thinning where appropriate, represents the best strategy to minimize the risks of an uncontrollable fire in the Ten Mile watershed.

# **TEN MILE WATERSHED PRINCIPLES, GOALS, ISSUES AND ACTIONS**

*(Adopted by consensus May 11, 2009 by the Ten Mile Collaborative Watershed Committee)*

*The Committee did not establish prioritization of these Principles and Goals.*

## **Principles to Guide Actions:**

- Use an integrated interdisciplinary approach.
- Respect/protect private property rights.
- Maintain quality control and oversight of work.
- Minimize environmental damage.
- Don't lose sight of the big picture and purpose of the Ten Mile Collaborative Watershed Committee.
- Insure project designs meet Montana State Best Management Practices guidelines.
- Assess proposed actions for impacts on linkage zones, wildlife, recreation and watershed productivity.
- Secure adequate funding to assure implementation of all recommended action items.

## **Goal: PROTECT AND IMPROVE WATERSHED WATER QUALITY & QUANTITY**

### **Issues:**

- Customers at risk of loss
- Sedimentation/filtration: Treatability at plant
- Abandoned mine waste/contamination
- At risk from wildfire
- Failing septic systems (stream/wetlands impacts)
- City diversion affects quantity
- Impact on fishery

### **Action:**

- Develop cooperative, interagency management agreement (*Utilize same approach/group as in Restoration Goal, below.*)
- Develop defensible space around inactive mine sites
- Identify sites at special risk due to wildfire.
- Develop mitigation strategies for such sites.

## **Goal: PROTECT CITY WATER DELIVERY INFRASTRUCTURE**

### **Issues:**

- At risk from wildland fire
- At risk from mine waste
- Limited funds for improvement Antiquated, vulnerable design
- Mixed land ownership
- Post-wildfire repair Vegetation close to flume (*see Dave Larsen proposal*)

### **Action:**

- Implement flume proposal, as approved by the Ten Mile Watershed Committee
- Prioritize defensible/survivable space around city water supply infrastructure
- Obtain the needed funds
- The City should be part of fire suppression, prevention and response planning and implementation

## **Goal: PROMOTE POTENTIAL FOR RESTORATION IN WATERSHED OF A VIABLE FISHERY & WETLANDS**

### **Issues:**

- Water quality and quantity
- Lack of Management Agreements

### **Action:**

- Develop Joint Management Agreement between DNRC, USFS, City of Helena, EPA, DEQ, FWP, etc. (JWG recommends same committee address Water Quality/Quantity.)

## **Goal: REDUCE DAMAGE OF MAJOR WILDFIRE**

### **Issues:**

- Rimini Safety
- Neighboring Communities Safety
- Damage from wildfire suppression efforts to multiple values
- Soils runoff
- Impact on aesthetic and recreation values
- Lots of fuel present
- Human starts (ignitions)

### **Actions:**

- Thin fuels
- Evaluate potential projects
- Utilize spatial arrangement/location of treatments to modify wildfire behavior
- Develop defensible space around mine sites
- Develop defensible space around Rimini
- Develop defensible space within the community of Rimini.
- Utilize prescribed burning with proper site preparation and prescription
- Develop strategies for fire originating within Ten Mile, and those coming from

- outside
- Enhance local firefighting capability Mitigate power line risk
- Develop management agreement between agencies for mitigation strategy
- Implement fuel hazard reduction projects

**Goal: PROTECT AND IMPROVE LONG-TERM QUALITY OF WILDLIFE HABITAT**

**Issues:**

- Too many roads-(habitat fragmentation)
- Beetle caused loss of Lodgepole and Ponderosa pine habitat
- Beetle kill creates new habitat
- Loss of thermal hiding cover
- Significant wildlife corridor zone
- Natural ebb and flow of habitat
- Fragmented management
- Cumulative impacts of human activities
- Dollars for restoration
- Travel management

**Action:**

- Identify linkage zones and develop habitat conservation strategies
- If conflicts between fire mitigation and habitat conservation strategies develop, use interdisciplinary approach to resolve
- The USFS should coordinate planning/actions with FWP, and US Fish and Wildlife Service.

**Goal: PROVIDE FOR PRESENT AND FUTURE PUBLIC SAFETY**

**Issues:**

- Rimini residents at risk
- Area workers and users, firefighters at risk
- Lack of readiness/awareness of some people

**Actions:**

- Designate evacuation routes
- Develop evacuation plan and routes, including a maintenance agreement
- Implement an education program re safety
- Prioritize defensible space around human structures/assets, sensitive soils, and mine wastes ("Prioritize" when used in these goals, means to establish as a priority, in relation to other goals stated.) Make "survivable", not just defensible space-this involves an assessment of structural details *\*Pat McKelvey will provide definitions.*
- Utilize a community-led program involving local leaders
- The Tri-County Firesafe Working Group should take the lead on this issue and secure the needed funds

**Note:** The Ten Mile Collaborative Watershed Committee should make a presentation of its overall recommendations (not just safety) to the Rimini Community.

## COMMITTEE RECOMMENDATIONS

### Prevention Projects

#### Landscape-Scale Treatments

#### Road Density

#### Temporary Roads *(Adopted June 8, 2009)*

#### Flume Proposal *(Initially supported on March 13, 2009, with subsequent modifications.)*

*Note: The following approvals are an interrelated “package” and only became final when all elements/sideboards were discussed and consensus reached.*

### **Prevention Projects:**

The JWG has identified the following prevention projects:

- 1) Ask the City to assess the potential of undergrounding power lines, which impacts fire hazard and road design issues.
- 2) USFS should cross-reference treatment projects with identified evacuation routes to achieve maximum synergy with treatments. Evacuation routes are identified in the Tri-County Regional Community Wildfire Planning Process as suggested by fire departments of jurisdiction.

### **Landscape Scale Fire Mitigation Treatment by Prescribed Fire:**

- 1) Endorse Finney’s 20-40% of landscape treatment model; utilize the interdisciplinary team (IDT) approach to designate the areas and prescriptions for prescribed fire treatment envisioned by the model. IDT’s should include experts in soils, hydrology, road maintenance and design, silviculture, fire suppression and fire mitigation, fish and wildlife, including participation by MT FWP.

Final determination of the percentage to be treated should be left to the specialists on the IDT.

Such treatments are not guaranteed to succeed. It is important that in public outreach that the proposed treatment not be oversold—it is a question of probabilities and risk management. At the same time, the serious risks and consequences to multiple values posed by unmitigated wildfire in Ten Mile need to be understood.

- 2) The group endorses Finney’s view that all units treated require the use of prescribed fire as a component to achieve the desired impact. Based on IDT evaluation, some sites may require forest fuel modification and/or removal prior to burning. In roaded areas, use of heavy equipment is acceptable to achieve this purpose.
- 3) Treatment at this scale will require several years to implement.

- 4) The public is cautious/concerned about the use of prescribed fire, and developing public confidence is highly important. Toward that end, one or more initial on-the-ground testing/demonstration projects are important. The normal design/approval process should be accelerated, consistent with appropriate environmental review of the initial projects and overall project. Planning should involve the public; the initial project site(s) should be visible if possible and be located so as to begin the mitigation of the risk to Rimini.
- 5) IDT should work to maximize synergy between fire mitigation and wildlife values for treatment areas.
- 6) The direct participation of the Fire Sciences Lab and Mark Finney should be sought; Finney has communicated to the USFS his willingness to be involved.
- 7) There are to be no new permanent roads.
- 8) Ongoing community engagement is essential to maximize credibility, transparency, confidence and public support and to help assure that the Ten Mile Watershed Committee's recommendations are carried out as envisioned. The Forest Service initially suggested such a citizen/community group, and has indicated that the Stewardship Authority Model, as used on the Beaverhead-Deerlodge National Forest, is preferred, indicating that the existence of such a functioning group would help elevate the Ten Mile in USFS project prioritization. Under this model, the USFS signs an MOU with an umbrella organization comprised of interested groups. The JWG endorses this recommendation.

It is important that the group recognizes and communicates effectively with the existing Resource Advisory Committee.

The City of Helena's ongoing participation, formalized by signing MOU(s), had been suggested by City Manager Tim Burton. The JWG endorses this recommendation, and suggests that the City of Helena be a full participant and co-signer in the community engagement process, but not the "convener". Thus, the convener would be determined by the new "umbrella group".

Any appointments to the citizen engagement group should require as a condition that the person/organization appointed supports the goals, principles and the proposed actions adopted by the Ten Mile Watershed Collaborative Committee.

*Not yet determined: How appointments are made and by whom. Or do groups volunteer and name their representative? Should the City appoint more than one representative (such as staff, HCC...)?*

- 9) Roadless/Roaded Areas of Ten Mile

- a) Prescribed fire treatments will be used in both roadless and roaded areas of the watershed.
- b) These distinct zones of the watershed need different “sideboards” defining acceptable approaches to treatment. No new roads, temporary or otherwise, will be constructed in the Inventories Roadless Area of Ten Mile. However, non-road firebreaks may be constructed if needed.
- c) The potential use of mechanized equipment for Roadless Area treatment has not yet been resolved by the TMWCC. Therefore, one or more initial treatments shall be applied in the Roaded area, with the results being assessed by the IDT and community engagement group. Roadless area prescriptions will be then designed by the IDT process, as per 1), page one of “Landscape Scale Fire Mitigation Treatment...” and, prior to any roadless area application, presented to the community group for review and approval.

### **Temporary Roads:**

- a. Temporary roads can only be used in implementing the Finney matrix when;
  - i. a) an equal distance of existing system and non-system road needs to have been decommissioned in follow up to the Travel Planning process or by other means, in advance of the construction of the temporary road, and a legally binding mechanism is used to assure timely removal.
  - ii. b) The IDT determines, and Community Engagement Group (CEG) concurs that:
    - 1. relocating the specific treatment area, as per Finney’s suggested flexibility of site specific locations, is not feasible in this specific case, and
    - 2. machine trail/forwarding removal of fuels, by themselves, are not practical to achieve the prescription.

### **Road Density:**

The Ten Mile Watershed is a landscape of unique importance to the City of Helena and people of the city and surrounding communities. Its multiple values include exceptional water quality, wildlife habitat and corridors, public recreation, among others. Reflecting this, key goals identified by the Committee include fire mitigation, water quality protection, fish and wildlife habitat conservation and enhancement, reduction of the threat of unmitigated wildfire. Species in the Ten Mile include moose, elk, white-tail and mule deer, wolf, lynx, wolverine, black bear, grizzly bear, among others.

The watershed is the site of numerous activities which have had, and will continue to have, a cumulative impact on these multiple values. These activities include a history of fire suppression, road construction, mining and a multi-year EPA mine

waste mitigation effort, as well as a range of prospective activities, including paving of the Rimini road, increased recreational development and use, and possible National Guard activities.

The presence of roads has been identified by the Committee as a highly important issue, relevant to multiple values, including but not limited to fire suppression, fisheries and wildlife habitat conservation and connectivity, and public recreation.

At first glance, the desire of wildlife/hunting advocates for some decommissioning of roads in the watershed, and the view of fire mitigation/suppression professionals that existing roads are important for these purposes, seemed incompatible. However, the group gave careful thought to these issues, and the importance of finding common ground. It recommends the following course of action:

The Helena National Forest is in the process of revising its Travel Plan, a critical component of which is the issue of road density and location. The location of many roads is not optimal in terms of fish and wildlife habitat, meaning that in specific locations roads reduce such habitat, below optimal levels.

To address this issue, the Committee endorses the goal of reducing road density. It recommends that as a part of the proposed, ongoing “Ten Mile Community Involvement Process” (referred to elsewhere in its recommendations) that a Road Density Subcommittee be formed to develop specific road recommendations for inclusion/adoption in the revised Forest Service Travel Plan to achieve this goal.

To assure a thorough and balanced assessment, the Road Density subcommittee should be comprised of fire suppression/mitigation specialists, conservation and community interests, and be advised by state and federal agency biologists. Members would, as with the broader Community Involvement Process, need to endorse the fish and wildlife habitat enhancement/road density reduction goal toward which the group is working. The group would carefully assess roads for importance for fire suppression and effects on fish and wildlife habitat and water quality, developing specific recommendations for roads to remain open, those to be gated, and those to be decommissioned to achieve the habitat enhancement goal.

The success of the Community Engagement Process will in part depend on substantial progress being made in a timely manner toward reducing total road density (miles of road).

### **Flume Proposal:**

*(The Ten Mile flume project was initially supported on March 13, 2009, with subsequent modifications.)*

### **Proposal:**

Cut and remove, or pile and burn, or mulch and spread, conifers that are 200 feet below portions of the flume that is on wooden trestle, and 75 feet above areas of wooden trestle. Cut and remove conifers that are within 200 feet on the uphill side of the flume where it has been excavated. Pile and burn existing down woody debris that is on the uphill side of the ditch portions of the flume. Wind firm species would be left but thinned out to 30 foot spacing between crowns. Some contour felling and staking would be performed on the uphill side of areas that have been ditched. The distances suggested above are subject to change upon further study or recommendations from other specialists. Proposed mitigation work along the flume would be accomplished using the same prescription regardless of ownership (private land or Forest Service)

### **Desired Future Condition:**

Manage the forested vegetation within 300 feet of the flume such that future fire intensity during peak summer conditions is reduced from a stand replacing, high intensity fire down to a low intensity surface fire with flame lengths less than 3 feet.

The mitigation work proposed will increase the effectiveness of fixed wing retardant drops or rotor wing bucket drops used during fire suppression operations along the flume in the event of a wildfire. Suppression crews with hand tools would be successful and could safely engage the fire.

### **Location:**

Immediate adjacent to the flume

### **Present Forest Composition:**

Mostly a mature lodgepole pine forest with a fully closed canopy. Some minor inclusions of subalpine fir, spruce, and Douglas fir.

### **Methods of Tree/Fuels Removal:**

Use existing road access where it exists coupled with log forwarders and if feasible, helicopters. Consider floating shorter logs.

### **Expected Season of Work:**

Any season when the impacts are acceptable. Not during spring break-up.

### **Maintenance Over Time:**

Keep regeneration to less than about 6 feet tall.

### **Specific Safety Concerns:**

None.

**Flume Buffer:** 231 acres

## **Summary of Modifications Adopted to the Flume Proposal:**

At the 3/19 Joint Working Group meeting, the flume proposal was supported, with the following points added by consensus:

- *Post-project roads will not be improved or their width expanded*
- *Treatment methods are be designed to cause the least soil disturbance possible and to minimize spread of noxious weeds.*
- *Confirmed/Supported DL's proposal to conserve wind-firm species.*
- *Targeted fuels removal should minimize vegetative cover disturbance.*
- *Contour felling will be practiced to reduce sediment delivered from above mitigation zone.*

At the 3/27 meeting, the following additions were adopted:

- *On the ditch portion of the flume, where the risk of erosion/sedimentation is high due to steep slopes or other factors, tree removal may be inappropriate.*
- *To minimize long-term risk to the flume and trestle, replacing the entire flume with metal pipe is recommended. This recommendation is not intended to delay implementation of the current mitigation project.*

On April 13, the TMWCC adopted the flume proposal with the following clarifications:

- *Use existing road access coupled with log forwarders, and if feasible, helicopters. At the conclusion of the flume project, roads will not be improved or their width expanded, with the exception of improvements designed to improve water quality.*
- *At the June 3 JWG meeting, the following suggestion of Don Clark was adopted, and approved at the June 8 meeting of the TMWCC:*
- *Explore the development of a pre-sedimentation basin to minimize the effects of sediment on the Ten Mile Treatment facility.*

## **Timing:**

All Ten Mile Watershed Committee recommendations are being forwarded to the City of Helena for its consideration.

In relation to the habitat enhancement/road density issue, the Helena National Forest's Travel Plan revision, currently underway, requires timely action. Therefore, if the City supports these road density reduction recommendations, the Committee proposes that the City communicate in a timely manner its support for these recommendations to the Helena National Forest.