

TENMILE-SOUTH HELENA PROPOSED TIMBER SALE & BURNING PROJECT Issues of Concern by People Who Care (PWC)

Scoping Comments Due: Friday, December 12, 2014

Comment To: comments-northern-helena@fs.fed.us or Helena National Forest Supervisor, 2880 Skyway Drive, Helena, MT 50602

Indicate that you wish to be kept on their mailing list and how you want to receive information: email and/or mail and provide your address(es)

Consider raising the following points, in addition to any others in your scoping comments:

- A project of this magnitude is unrealistic and places an undue burden on citizens to evaluate.
- Stay out of the Inventoried Roadless Areas. Congress considered these areas worthy of Wilderness and passed a bill that included them (subsequently pocket-vetoed by Pres. Regan).
- Spend available funds implementing private land fire buffers. This type of treatment is most effective and least impactful to the forest and landscape.
- Display *all* activities that have occurred within the Tenmile and west Prickly Pear drainages and then evaluate the cumulative effects of these as well as foreseeable projects upon Forest Plan Wildlife, Water Quality and Old Growth Standards.
- Why haven't provisions from past projects been implemented as per their Records of Decision or Decision Notices?
- Explain how wildlife standards have been met in the past and why they were suspended for the Hazardous Tree Removal Project which impacted all subsequent projects and Forest Plan standards.
- How will wildlife winter range meet the needs of wildlife in the future if the 25% thermal cover standard is reduced?
- How will summer habitat effectiveness be ensured when the minimum of at least 35% cover would be dropped? How has past cutting so much of the landscape been in compliance with this standard? How will proposed cutting help big game summer range?
- How will big game security be ensured when NO cover will be required in the proposed amendment?
- If wildlife standards are verging on collapse, then take measures to restore habitats to meet existing standards.
- How are the Forest Plan standards for Management Indicator Species such as pileated wood peckers, goshawks, marten, and cutthroat trout being met? Will the project improve habitat for them? How much more decline can their habitats suffer before a forest plan amendment is also pursued for them? Have they already reached that tipping point? Visually display where these habitats exist and if they meet the standards.
- How will this project affect ethical hunting opportunities and encourage poor behavior such as taking long shots across clear cuts, shooting from roads, and creating firing lines as has been demonstrated recently when wildlife do not have cover?
- How will wildlife movement corridors and genetic linkage zones be ensured when this segment of the Continental Divide provides the most direct route between the Northern Continental Divide Ecosystem and the Yellowstone Ecosystem, but the last remaining Inventoried Roadless Areas in this fragile zone would be roaded, cut, and burned?

- Recognizing that the Purpose of this project states, ***“Maintaining a consistent quality and quantity of water”***:
 - Where is the recognition that current water quality is substandard?
 - How will water quality be improved by implementing this project?
 - Why hasn't the HNF done more to meet water quality objectives?
 - How does creating thousands of acres of cutting units improve water quality?
 - How will removal of forest cover and construction of 40 miles of new road affect run-off?
 - What will happen to the moisture content of the landscape, and how will that affect fire behavior?
- About 50% of this project does not occur within the municipal water supply so how does cutting and burning this area comply with the project's Purpose to address the municipal watershed?
- What is the status of old growth forests in the project area, and are the standards to maintain them being met?
- How would the proposal alter old growth forest characteristics such as soil moisture, dead and down woody material, understory diversity?
- Analyze the efficiency and effectiveness of implementing private lands buffers against fire as an alternative to landscape treatments.
- Describe cost-effectiveness of implementing such buffers as compared to cutting/burning vast areas of the landscape.
- What are the ecosystem costs of landscape “treatments” as compared to private land fire buffers with respect to ecosystem services such as sustained water run-off, diverse and more hydric forests, intact fish and wildlife habitats, and maintaining undisturbed soils that have minimal weed presence.
- How would heavy machinery that is schedule to be active on nearly all of the burning and cutting units affect soil compaction, run off, and the spread of weeds?
- How would planned aerial spraying of herbicides retain native forb species (such as balsam root, orchids, buffalo berry, sagebrush)?
- How will fisheries habitats be improved through this project?
- How will visual quality objectives be altered? Extensive clear-cuts (regeneration harvests) as have occurred along the Park Lake Road, at Chessman Reservoir, at the head of Go Devil and Whiteman Gulch, along Minnehaha Creek, and other areas within the project area are no longer aesthetically pleasing.

Thank you for thoroughly addressing these comments, and retaining me/us on your mailing list.