



# Montana Fish, Wildlife & Parks

*Region Three  
1400 South 19<sup>th</sup> Ave  
Bozeman, MT 59718*

December 12, 2014

Heather DeGeest  
Helena Ranger District  
Re: Tenmile – South Helena Project Project  
2880 Skyway Drive  
Helena, MT 59602

Email: [comments-northern-helena@fs.fed.us](mailto:comments-northern-helena@fs.fed.us) (Subject Line: -“Tenmile – South Helena Project”)

Dear Ms. DeGeest:

FWP has reviewed the scoping letter and map for the proposed Tenmile – South Helena Project. FWP appreciates this opportunity, as well as the meeting last week, to provide input. Our comment at this time is intentionally broad in scope, and we will provide more specific comment when the Forest Service (FS) has developed alternatives under a draft EIS.

FWP considers the Tenmile area and notably the two Inventoried Roadless Areas (IRAs) within it important wildlife habitat and linkage areas, and would like to see its functionality as such maintained or improved, especially given the ever increasing pressure within and surrounding the area. These IRAs provide some of the only remaining secure habitat on the Helena Ranger District (RD), if not the only secure habitat east of the divide south of Highway 12. Further, within these IRAs, green and/or wet sites are becoming more important as they are utilized more, and likely are more preferred, by wildlife. Unfortunately, the area surrounding these IRA's has a high density of open motorized routes and is either highly developed and impacted already, or likely to become so in the near term, which significantly diminishes and fragments wildlife habitat. Road development also negatively influences the hydrology of the watershed and increases stream sedimentation, while fish populations can become fragmented by improperly constructed stream crossings. Recent past, ongoing, and future projects and impacts include: paving of the Rimini Road, which bisects the IRAs, numerous private land in-holdings, highly developed and developing Travis Creek, Lump Gulch and Corral Gulch, Mine Waste Repository on the crest of the continental divide, mine waste cleanup and hauling by the EPA, and FS projects including Hazard Tree Removal and Chessman.

FWP is concerned about the extent of the proposed project, and hopes the FS will develop an alternative that incorporates the needs of wildlife and the desires of the public to have healthy, huntable wildlife populations in Helena's backyard, on the Helena RD. In such an alternative, FWP envisions that:

1. Treatment within the IRAs would be reduced substantially and would avoid green and/or wet areas, as well as other areas identified as having wildlife value (e.g., regenerating aspen stands, old growth).
2. Treatment across and within big game security areas would be reduced substantially and would avoid green and/or wet areas.
3. Regeneration harvest would be reduced, especially in the Corral Gulch area and along the Upper Tenmile Creek where, as it is currently proposed, it would reduce or eliminate additional cover immediately adjacent to Hazard Tree removals. At a minimum, sufficient cover would be left to facilitate big game movement across this route or the route would be closed during fall hunting seasons.
  - a. Regeneration harvest would be identified by type: clearcut, seed tree, and shelterwood, as described in the scoping document. It would also be useful for our review to identify predominately dead stands of lodgepole pine, both stands intended for clearcutting and not.

4. Miles of temporary routes would be reduced.
5. Miles of temporary routes would be matched with closure and decommissioning of open routes (routes identified as open under the new Travel Plan, FEIS expected 2015).
6. Existing routes would not be improved, and all temporary routes would be closed to public travel and would be reclaimed after treatment.
7. Existing stream crossings will be inventoried and undersized culvert crossings would be replaced with appropriately sized crossings that span bankfull width. Any temporary stream crossings will be appropriately reclaimed after treatment.
8. Timing of work and the implementation timeline would consider fish and wildlife needs.
9. Amending wildlife standards would be unnecessary.
10. Focus of treatments would be to increase defensible space around private land structures.
11. A plan for weed treatment would be incorporated into the project.

FWP supports work that will increase defensible space around private land structures. In addition, FWP thinks that some treatment is warranted and even desirable, given the extensive loss of live trees and the lack of heterogeneity that preceded such loss. However, dead trees provide some benefit to wildlife, including big game security during fall, and in some areas may be the only option for security. Secure habitat is already a limiting factor on the Helena RD. The extent of treatments proposed, the addition of 40 miles of temporary roads, and reconstruction of 80 miles of haul routes are of concern to FWP. The Helena RD is a highly fragmented landscape (roughly 70-80% roaded). Improvements to existing routes compound the impacts to wildlife. Given the anticipated need to amend Forest Plan wildlife standards 3, 4a, and 6, (summer habitat effectiveness/hiding cover, fall big game habitat security, and thermal/winter cover) and to amend Management Area Standards, it is apparent that the project as proposed would be detrimental.

FWP is interested in learning more about the fire behavior modeling used to develop this proposal and in seeing a map of this project overlaid with big game security areas, past projects (e.g., Hazard Tree, Chessman, Strawberry Butte, etc), the “fireshed zone” around the project area referred to in the scoping document, and the final Alternative selected in the Travel Planning Process (FEIS expected 2015). FWP would also like to know which haul routes are intended for reconstruction.

Thank you for this opportunity to provide our comments on this proposed project and for continuing to include our biologists in discussions on Forest projects and planning. We are interested in collaborating on this project to further refine treatment units and location of specific treatment methods. Please continue to send project information to our area biologists, Jenny Sika (wildlife) and Eric Roberts (fisheries), via electronic mail ([jsika@mt.gov](mailto:jsika@mt.gov), [eroberts@mt.gov](mailto:eroberts@mt.gov)).

Sincerely,



Sam Sheppard  
Region Three Supervisor

c: Howard Burt, R3 Wildlife Manager  
Jenny Sika, R3 Wildlife Biologist  
Eric Roberts, R4 Fisheries Biologist

