

MEMORANDUM

To: The Tenmile South Helena Forest Restoration Collaborative Committee, City of Helena, stakeholders, resources, and media

From: Ecosystem Research Group

Date: January 28, 2016

Re: Tenmile South Helena Forest Restoration Collaborative Committee strategy for commenting on the Tenmile South Helena Draft Environmental Impact Statement

Tenmile South Helena Forest Restoration Collaborative Committee Chairman Joe Cohenour recently had a conversation with the Collaborative's facilitator, Ben Ireby of Ecosystem Research Group (ERG), to discuss opportunities for effective commenting on the Tenmile South Helena Draft Environmental Impact Statement (DEIS). Ben Ireby then had a conversation with Gregory Kennett, Principle at ERG, who has a lot of experience coordinating commenting processes for National Environmental Policy Act (NEPA) documents such as this DEIS. Chairman Cohenour and Ben Ireby suggested a strategy for commenting on the DEIS at the January 13, 2016 meeting of the Committee. The Committee provided feedback, which was incorporated into the following strategy. Please review the strategy below in preparation for the release of the DEIS. Please send your comments and suggestions on the strategy to Ben Ireby at birey@ecosystemrg.com.

Helena District Ranger Heather DeGeest suggested to Chairman Cohenour that the Telegraph Vegetation Project could serve as an example of what the Committee should expect in the Tenmile South Helena DEIS. Please follow this [LINK](#) to learn more about the Telegraph Vegetation Project DEIS. Keep in mind that the purpose and need of the Telegraph Vegetation Project differs from that of the Tenmile South Helena Project.

What follows is a simplified version of the draft table of contents for the Tenmile South Helena DEIS:

- Chapter 1. Purpose and Need for Action
- Chapter 2. Alternatives, Including the Proposed Action
- Chapter 3. Affected Environment and Environmental Consequences
 - Introduction
 - Resource sections: Inventoried Roadless Areas (IRAs), Fisheries, Heritage and Cultural Resources, Wildlife, Forested Vegetation, Hydrology, Air Quality, Botany, Transportation, Fire and Fuels, Noxious Weeds, Recreation, Scenery, Soils, and Economics
- Chapter 4. Consultation and Coordination

Upon the online release of the DEIS¹, each Committee member will begin by reading Chapters 1 and 2, focusing on the purpose and need, the design criteria, the proposed action, and the descriptions of the alternatives. Committee members will then begin reading the following resource areas in Chapter 3; these assignments do not restrict Committee 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
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

ERG will ask stakeholders to submit written comments for the Committee to consider while Committee members are reading the DEIS. Committee members should reach out to the stakeholders they represent and consider including their views in the comments submitted.² Committee members should also reference the Committee's Table of Recommendations and consider how their comments might support the agreed upon Committee goals.

At the January 13, 2016 Committee meeting, the Committee identified IRAs, wildlife, fuels and fire, transportation, forested vegetation, and hydrology as resource areas that will require a lot of 'heavy lifting' when the DEIS is released, therefore, the following informal study groups were formed around those resource areas. The formation of these study groups does not preclude any Committee member from attending any gathering of a study group, nor does 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

¹ The Forest Service recently estimated that the DEIS would be released online by February 1, 2016 and published in the Federal Register by the middle or end of February, 2016, which will start the 45-day comment period.

² According to the City of Helena's "Resolution Establishing the Tenmile/South Helena Forest Restoration Collaborative Committee", the Committee is representative of the wider community of stakeholders in the Tenmile South Helena area. Reaching out to the wider community of stakeholders will further enhance the representative nature of this Collaborative Committee.

Committee members are encouraged to reach out to one another when forming their comments, especially if they think that a certain Committee member may not find the comment acceptable. This will reduce the amount of time needed to discuss and deliberate on comments at Committee meetings. Also, Committee members should prioritize their commenting time by focusing first on the areas that are most important to the Committee.

Committee members should generate comments in the following format:

- (1) Identify the key issue that the comment is addressing (e.g. elk security, soil compaction).
- (2) Clearly and concisely articulate the problem (e.g. elk security is impacted by treatment, excessive soil compaction will occur).
- (3) Provide a detailed comment on the problem, including page numbers and site specific location information (e.g. Page 111. For Treatment Unit 99, the proposed treatment type will excessively reduce elk security. Too much of the forest floor will become visible from Road 9999 on the other side of the drainage.).
- (4) Propose a solution that supports the purpose and need of the project and the goals of the Collaborative Committee (e.g. Mitigate the effects of Treatment Unit 99 on elk security by tying in terrain features with pockets of denser overstory and understory).
- (5) Provide references to help support the comment (e.g. See Tenmile Collaborative Table of Recommendations goal, "Protect and improve long-term quality of wildlife habitat").

Committee members will compile their comments into a spreadsheet template that ERG will provide. Committee members can then send their comments to Ben Irely. He will compile all of the Committee's comments into one document, send them to the Executive Committee for review, and then send them to Committee members and to the wider group of stakeholders. Committee members should read the compiled comments thoroughly and note any changes they would like to see made. Stakeholders will be given the opportunity to submit written feedback on the compiled comments for the Committee to review.

The Committee will then meet to test consensus on their comments. ERG will provide two facilitators for this meeting. This meeting will likely take the majority of one business day. When consensus is tested, if the Committee does not gain consensus on a particular comment, those Committee members that did not find the comment acceptable should be 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. Consensus will then be tested for the revised comment. If, upon the second testing, the comment does not gain consensus, the comment will be tabled. The Committee member that drafted the original comment and those that dissented should be tasked with revising the comment so that it is amenable to their concerns. The redrafted comments will be tested for consensus during a final round of testing. Those comments that still do not have the consensus of the Committee will be recorded and sent to the Forest Service with the level of consensus noted (e.g. consensus minus one - conservation representative). Members of the public should submit their feedback regarding this meeting in writing. A tentative follow-up meeting will be scheduled in case there are any loose ends.

Ben Irej will compile the consensus comments and those that did not achieve consensus but that had the level of consensus noted into a draft commenting document. Ben Irej will assemble all stakeholder comments received during the course of the comment period into an addendum. Ben Irej will then send the draft to the Executive Committee for review. He will incorporate their feedback before sending it once more to Chairman Cohenour for final approval. The final comment document will be sent to the wider group of Committee members, stakeholders, resources, and media. The Committee will then hold a public meeting to present their comments. After the public meeting, Chairman Cohenour will deliver the final comment document to the U.S. Forest Service. The delivery of the final comments to the Forest Service will need to occur within 45 days of the publishing of the DEIS in the Federal Register. The following timeline for commenting is based on a Monday, February 1, 2016 online release of the DEIS and an estimate of Wednesday, February 17 as the day the DEIS is published in the Federal Register and the first day of the 45-day comment period.

Monday, February 1, 2016	Estimated DEIS online release date
Wednesday, February 10, 2016	Next scheduled meeting of the Tenmile South Helena Collaborative Committee
Wednesday, February 17, 2016	Estimated first day of 45-day comment period
Tuesday, March 1, 2016	Committee members send their comments to Ben Irej
Monday, March 7, 2016	Ben Irej sends compiled comments out to wider group
Wednesday, March 9, 2016	Committee meeting to gain consensus on compiled comments
Wednesday, March 16, 2016	Follow up Committee meeting to gain consensus on remaining comments
Wednesday, March 23, 2016	Public meeting to present consensus comments
Thursday, April 1, 2016	Estimated last day for submitting comments to the Forest Service on the DEIS

Lastly, the Committee should view the process of commenting as a trust building exercise, where, by the end of this commenting period, there is more trust between Committee members than at the beginning of the comment period.