

# GRAVELLY LANDSCAPE COLLABORATIVE

October 18, 2017

USDA-Beaverhead-Deerlodge National Forest  
Madison Ranger District  
5 Forest Service Road  
Ennis, MT 59729

Re: Greenhorn Project

Dear Dale Olson –

Thank you for the opportunity to comment on the Greenhorn Project. On behalf of the Gravelly Landscape Collaborative we appreciate the Beaverhead-Deerlodge National Forest (BDNF) moving forward with this landscape level restoration project.

The Gravelly Landscape Collaborative (GLC) is a diverse group of citizens and stakeholders who value the Gravelly area for its working lands, rich fish and wildlife habitat, natural resources, opportunities for recreation, and clean water. We believe through cooperation and open dialogue we can help advance solutions to shared problems. Initiated in 2012, we have strived to include all relevant interests and to foster a transparent, consensus-driven approach to addressing natural resource and community concerns of the Gravelly Landscape.

## **Background**

The GLC's overarching goal is to develop ecologically appropriate, scientifically supported restoration projects that will benefit the forests, fish and wildlife populations and local communities of the Gravelly landscape. Using the best available science and local expertise, the Collaborative aims to advance necessary on-the-ground projects that will:

- Enhance and restore fish and wildlife habitat
- Improve the resilience of forests
- Allow wildfire to play its natural role in the landscape
- Manage weeds
- Support the diverse uses of the landscape
- Fix eroding trails and roads

The GLC worked hard with the help of experts to ensure the Greenhorn project addresses all of the above points. That being said, the Greenhorn project is the GLC's project; It is the Forest Service's project; It is the community's project. The Greenhorn project is "our" project. Over the past five years we have worked for transparency and collaboration and we have learned a lot and would like to share some of our lessons learned.

A powerful lesson learned is that collaboration provides the opportunity to leverage resources and form partnerships. It strengthens the thinking and development of projects. The Forest Service has done a good job bringing community to the table and meeting people to talk about this project. And as the project moves forward the GLC encourages the Forest Service to continue these outreach efforts. We also encourage the Forest Service to think further about potential partnerships and to work with people who know the area, including ranchers, the weed cooperative, the watershed council and local wildlife biologists during implementation and post project monitoring efforts.

This project could serve as the model for community based collaboration, cooperation with the Forest Service and landscape level project development, implementation and post project activities. The GLC would like to continue the partnership with the Forest Service to support outreach and information sharing opportunities.

The GLC has provided comments and recommendations below. We offer our input on this project in the spirit of the collaborative process to strengthen the decision memo that provides the clarity needed for all concerned parties.

### **Landscape Level Management**

The GLC spent five years learning about current conditions on the landscape and identifying what future conditions would best serve the resources, users and natural processes unique to this place. Through community-based conversations and the most current science along with resource specialists, the GLC ultimately outlined a set of goals and actions for the Greenhorn area. The project the GLC proposed to the Forest Service included 11,000 acres of potential vegetation treatment. But after several public meetings and a lot more input the acres for proposed treatment rose to 16,702. The GLC acknowledges the Inventoried Roadless Acres (IRAs) in the project area and has worked to ensure the values of that landscape are kept intact in this project. There will be no roads or machinery in the IRAs, only chainsaws, aerial ignition and hand ignition treatments will take place in the IRA.

Recommendation:

- Forest Service clearly states the process for communication with the public regarding implementation of the treatments

### Opportunities in the Landscape

#### Roads

Within the project boundary, the northwest corner has several roads that run parallel in the Idaho Creek management/watershed area. Some of these roads may be redundant and could be considered for decommissioning to minimize fragmentation on the land. Decommissioning roads can be a contentious issue. The Forest Service will need to reach out to local folks to communicate and understand what the use of the roads looks like out there. Therefore, local input is essential when considering roads and should be included in determinations when making final decisions.

Recommendation:

- Forest Service considers decommissioning roads, while maintaining access, in the Idaho Creek watershed area guided by local people and local knowledge

Fire

The GLC sees the opportunity to bring fire back onto the landscape with prescribed fire treatments. The goal of prescribed burning is to increase diversity on the landscape and address conifer encroachment. These treatments are supported by specialists and biologists. Fire suppression in the Gravelly Landscape has allowed conifer encroachment into sagebrush which historically have not been there. Aspen stands have also been encroached upon because of fire suppression. Prescribed fire would speed nutrient cycling and reduce fuel loading to improve resilience to future wild fires. Prescribed fire is a tool the Forest Service can use to reduce fuel loads with less ground impacts that are seen when mechanized equipment is used. The GLC supports creating a mosaic burn pattern to help prevent catastrophic fires. The GLC understand the decision memo will include the intention of the treatment and the plan for implementation.

Comment:

- The GLC supports the use of prescribed fire and the aspen/encroachment work in the Inventoried Roadless Areas of the Greenhorn project.

Recommendations:

- Burn plans need to be clear about pasture management regarding rest and season of grazing
- In the event a prescribed burn exceeds control boundaries and pastures are burned, becoming unavailable to grazing permittees that season, the Forest Service will work with the permittees to determine if rest pastures can be used to complete the grazing rotation

**Aquatics**

Aquatic conditions in the Greenhorn project area are generally good and recent projects have been implemented to support fisheries. The GLC supports the work that improves water quality and restoring fish habitat. The restoration treatments include replacement of several failing culverts on Warm Springs and Timber Creek to reduce erosion, manage and reduce sediment inputs along the roads, and reduce damage to riparian areas. Within the Greenhorn project area includes a Forest-designated Fish Key Watershed defined as “watersheds selected for focusing of federal funds and personnel for the purpose of protecting, restoring, or maintaining viability of Threatened, Endangered and Sensitive aquatic species.”<sup>1</sup> The Idaho Creek watershed and Greenhorn Mountain watershed are the two areas with native fish populations designated as Fish Key watersheds.

Riparian Conservation Areas (RCA) exist on all streams, rivers and waterbodies on the Forest. RCAs are defined as “portions of watersheds where riparian-dependent resources receive primary emphasis and management activities are subject to specific standards and guidelines.

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<sup>1</sup> Beaverhead-Deerlodge National Forest. Forest Plan January 2009. Page 292.

Examples include traditional riparian corridors, wetlands, intermittent streams, and other areas that help maintain the integrity of aquatic ecosystems.”<sup>2</sup> The Forest Service has clear guidance regarding the size of the RCA and how to manage those areas based on the category of the waterbody (fish bearing streams; permanently flowing non-fish bearing streams; ponds, lakes, reservoirs, and wetlands greater than 1 acre; and seasonally flowing or intermittent streams, wetlands less than 1 acres, landslide-prone areas). The GLC supports prescribed fire and aspen work in the RCAs without detrimental impacts to the riparian areas.<sup>3</sup>

**Recommendations:**

- Forest Service work to minimize impacts to soils and water
- Carefully plan and implement work along riparian corridors for fisheries and watershed functions
- Carefully plan and implement work within fisheries restoration areas

**Wildlife**

On forest lands not suitable for timber production but timber harvest is permitted to meet other resource objectives, wildlife habitat enhancement is one, among many, of those objectives<sup>4</sup>. The GLC identified bighorn sheep, beaver, mule deer and moose habitats for areas needing improvement along with the need to expand bighorn sheep corridors. This project will support and enhance cover and forage for animals by providing the needed mosaic of species and age class of native trees, shrubs, grasses, and forbs.

**Recommendations:**

- Enhance potential bighorn sheep corridors within the project area

**Vegetation**

Dense, uniform stands of Douglas-fir have encroached upon the aspen stands in the Gravelly range over the last century. These aspen stands benefit the wildlife and other plants; the GLC doesn't want to lose this important vegetation attribute on the landscape. Aspen treatments are using the newest science that identifies conifer removal as the best approach.

Old growth

Old growth is defined as 5 trees greater or equal to 19 inches in diameter with a minimum age of 200 years and minimum basal of 60 feet<sup>5</sup>. The GLC supports the Forest Service's efforts to maintain the larger diameter trees on the landscape. Because this area of the forest is productive, some of the trees that are 19 inches in diameter are younger than 200 years old and may be harvested. However, the GLC would like to see the larger trees stay on the forest.

**Recommendation:**

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<sup>2</sup> Beaverhead-Deerlodge National Forest. Forest Plan January 2009. Page 300.

<sup>3</sup> Beaverhead-Deerlodge National Forest. Forest Plan January 2009. Page 19.

<sup>4</sup> Beaverhead-Deerlodge National Forest. Forest Plan January 2009. Page 38.

<sup>5</sup> Beaverhead-Deerlodge National Forest. Forest Plan January 2009. Page 44.

- Maintain large diameter trees in the project area as is reasonable for the designated treatment areas

### **Weeds**

Noxious weed management is a challenge in southwest Montana. The GLC has expressed concern about the spread of weeds and what will be done to minimize the expansion of weeds in the project area. The GLC supports the Forest Service approach to weeds management in the project to inventory and treat noxious weed infestations prior to project implementation; all equipment will be washed before entering the project area; disturbed sites will be prepared to provide a seedbed of reestablishment of desirable vegetation; and harvest/thinning treatments would be managed through design criteria such as season of treatments to keep the overall amount of soil disturbance within the BDNF Forest Plan Standards.

The Forest Service would greatly benefit by working with local people who know the landscape, know where weed infestations are located and work together to update weed mapping and address the weed infested areas.

#### **Comment:**

- It is important that weed control efforts are executed by trained herbicide applicators that can identify the target species, use the appropriate chemical and rate, and make substantial efforts to reduce collateral damages to native species. Mechanical, biological and grazing treatment options should also be considered as alternatives.

#### **Recommendations:**

- Forest Service includes local people in the weed inventory
- Forest Service contractors minimize ground disturbance as much as possible
- Include weed identification and treatment in the post-treatment monitoring plan

### **Grazing**

Several local ranchers have allotments located in the project area. It is critical from now through the end of implementation of the project that the Forest Service work closely with them and the associated grazing associations. Timing, coordination and communication about potential impacts to allotments with permittees is the key to success within the prescribed fire treatment units Concerns raised at the last GLC meeting on September 13<sup>th</sup> included:

- Grazing timing and locations during and post treatments
- Forest Service flexibility with permittees to ensure ranching operations are successful through the duration of the project, working to maintain the grazing plans
- Communication of timing for burns, rest and return to pastures
- Potential infrastructure damage due to loss of control of the fire.

Permittees stated balancing the grazing permits with the improvements the treatments will bring to the landscape is important. The Warm Springs Grazing Association has a good record of management and record keeping. It is beneficial for all parties that the Forest Service continue to partner with the Association as the project moves forward.

Comment:

- Current grazing management plans identify target conditions that maintain vegetative health and productivity. These plans also identify resource areas that are sensitive such as riparian zones and aspen groves. Grazing plans work best when permittees and range ecologists work together to identify strategies that benefit livestock and vegetation resources.

Recommendations:

- Forest Service works with and maintains communication with allotment permittees as the burn units are planned and coordinate timing
- Forest Service works with the permittees to determine if rest pastures or adjacent allotments can be used if the timing of the treatments impacts the usual rotation.
- Forest Service will replace any infrastructure (ie: fences) if they are destroyed during a prescribed burn treatment
- Forest Service, as much is possible, provide clear expectations around ranching activities during and after treatments
- Forest Service provides direction when cattle can return to pasture. If direction changes the Forest Service will communicate as early as possible with the impacted ranchers about the changes and work with them for a mutually agreed upon solution.

### **Recreation and Hunting**

The Gravelly Landscape is relied upon by local communities for recreation and hunting. More broadly speaking, Montana residents and visitors appreciate the high quality hunting and fishing of the area. Access for hunting, fishing and general recreation is important and quite good throughout the project area.

Comment:

- The high quality hunting experience in the Greenhorns is a product of limited motorized access, which allows for abundant big game security areas. To maintain these big game security areas, projects implemented should be conducted in a manner that does not increase legal motorized use or the potential for illegal motorized use. Any new roads or trails created by treatment efforts should be completely eliminated following treatment. If existing trails or closed roads are used for treatment access, they should also be returned to existing conditions.

Recommendations:

- Maintain access and good conditions for hunting and recreation in the project area
- Maintain appropriate handicapped access for hunting

### **Monitoring**

The GLC strongly encourages the Forest Service to monitor the treatments areas over the long term to determine if the prescribed treatments met the goals of the project.

Recommendations:

- Create a monitoring plan to share with the communities with clear goals and timelines for the life the monitoring effort
- Use a variety of monitoring strategies and techniques
- Develop monitoring partnerships with local people and organizations to collect data

**Conclusion**

The Gravelly Landscape Collaborative appreciates the opportunity to provide comments on the Greenhorn project. The Greenhorn project is an example of a community crafted landscape-level project and partnership with the Forest Service. As noted earlier in this document, the **Greenhorn project is “our” project**. We worked together to identify the needs on the landscape and the best methods to move the project forward. The GLC supports this project and will continue to work with the Forest Service to ensure we meet our stated goals and to communicate the progress to the broader community over the life the project.

Sincerely,

Gravelly Landscape Collaborative Steering Committee