



November 16, 2011

Mr. Kevin Riordan
Supervisor
Helena National Forest
2880 Skyway Drive
Helena, Montana 59602

Ms. Amber Kamps
District Ranger
Lincoln Ranger District
1569 Highway 200
Lincoln, Montana 59639

SUBJECT: Dalton Scoping

Dear Supervisor Riordan and Ranger Kamps:

Members of the Helena Hunters and Anglers Association (HHAA) appreciate the opportunity to submit scoping comments on the Lincoln Ranger District's proposed Dalton Mountain Forest Restoration and Fuel Reduction Project. We have reviewed the project description information and maps provided through the Helena National Forest website and discussed the proposed action with club members at our last general membership meeting. Based on feedback from our members, we are submitting the following comments, concerns and alternatives for your consideration. We also request the opportunity to participate in the public process during and following development of the project EIS. Our comments fall under seven interrelated themes, as follows:

Project Purpose and Scope

Helena Hunters and Anglers Association members support the need for restoration projects within the Helena National Forest, especially those that address fish and wildlife habitat. The Dalton Mountain Forest Restoration Project is described as a "forest stewardship" project aimed at increasing vegetative diversity, reducing fire danger, and providing for a sustained harvest of timber. Benefits to wildlife habitat and connectivity (especially for sensitive and endangered species), watershed health, and functioning ecosystems are alluded to on page 8 of the project description (Restoration Principles). However, the proposed actions focus mostly on timber harvest related treatments that may have direct detrimental effects on wildlife and watershed attributes. For example, nearly 50% of the 18,240 acre (28.5 square mile) project analysis area is proposed for mechanical timber harvest. We would prefer to see project plans modified to achieve more comprehensive forest restoration, with more tangible benefits to fish and wildlife resources.

Consistency with 1986 Helena National Forest Plan

The Helena National Forest Plan sets management direction for the Dalton project area, and establishes forest management standards that must be conformed to. We are concerned that the proposed timber harvest and vegetative treatment emphasis of the Dalton Mountain project may not be entirely consistent with the management prescriptions established for the project area in the Forest Plan. We are also deeply concerned that the project may require site-specific amendments to the Forest Plan, specifically as they relate to allowing increases in open road density and reductions in big game hiding cover. Such amendments would work to the detriment of wildlife values, cannot be supported by HHAA, and are unacceptable within the context of a forest restoration project. Additionally, we are concerned about the claims of other commentators that the proposed Dalton Mountain Project is similar to a previously proposed Nevada-Dalton timber sale that was halted due to a failure to meet various standards. We would be curious to see an analysis of how this project proposal differs from the former Nevada-Dalton proposal.

Wildlife

This “restoration” project would be strengthened considerably and elicit more public support if its goals included tangible benefits to wildlife. In particular, a modified Dalton Mountain Project proposal should address the habitat and security needs of grizzly, wolverine and lynx in this area, reduce open road densities, enhance security cover for elk and other species, and not require wildlife-detrimental amendments to the Forest Plan.

Travel Management Planning

Helena Hunters and Anglers have devoted a considerable amount of time and energy commenting on and helping develop a conservation alternative to the Blackfoot Travel Plan which is under development. We have voiced concerns that the development and implementation of the Blackfoot Travel Plan needs to be comprehensive and fully address the needs of water quality, soil integrity, native vegetation, fish and wildlife populations and their habitats, as well as fair chase hunting opportunities. We are concerned that this travel management planning process must be completed before projects proposals such as the Dalton Mountain Project, including even temporary new road construction, can be realistically planned and analyzed within the context of the broader travel plan. Conversely, the Dalton Mountain Forest Restoration Project could pose an opportunity to help implement the Blackfoot Travel Plan after it is finalized by decommissioning and restoring existing but unneeded roads within the project analysis area. Additionally, we are concerned about the timeframe for obliteration of the proposed 6.4 miles of new roads to be built to accommodate timber harvest under the Dalton Mountain Project. If the Dalton Project purpose is to provide a sustained harvest of timber and includes pre-commercial timber harvest treatments, can we expect these new roads to remain open for an extended period, perhaps years or decades?

Monitoring

The Dalton Mountain Project proposes to use an adaptive management approach that evaluates alternative treatments for effectiveness over time, coupled with monitoring. Consistent, long-term monitoring is critically important as a feedback loop in the adaptive management process. We are concerned about the availability of long-term funding to support the required monitoring. We are also suggesting that the scope of monitoring for the Dalton Project be greatly expanded to include wildlife effects (especially relative to sensitive species such as grizzly, wolverine and lynx), fisheries, weeds, and travel management.

Management Activities within Inventoried Roadless Areas

Helena Hunters and Anglers support protection and expansion of inventoried roadless areas because of their values to wildlife security, sensitive species, watershed integrity, and dispersed non-motorized, fair chase hunting opportunities. We are concerned about the potential negative effects of the proposed extensive timber harvest activities immediately adjacent to two important roadless areas. We are also generally opposed to the proposed vegetative treatments within the Nevada Mountain and Ogden Mountain roadless areas because of the high wildlife security and recreational activities they provide. However, if the scope of the Dalton Mountain project is modified to emphasize resource values other than timber harvest, we would support a roadless area-wide analysis of opportunities to enhance wildlife values through site-specific prescribed burns. We would also welcome the addition of monitoring components within the inventoried roadless areas as a part of the Dalton Mountain Project to evaluate vegetative, wildlife and other trends in the absence of anthropogenic treatments. For example, whitebark pine is declining throughout the forest and a monitoring control would be useful to evaluate the effectiveness of the Dalton Project in restoring whitebark pine.

Project Economics

We are very concerned about the anticipated large capital investment costs that will ultimately fall to the public for new road construction and reconstruction, road maintenance, and other activities. The project as presently proposed subsidizes large and small commercial timber interests but does not demonstrate comparable returns to the general public in terms of wildlife, ecosystem and watershed values, fisheries, and recreation. Modifying the project to include broader, more comprehensive restoration goals could help to address this concern.

Thank you for the opportunity to comment. Please give our concerns and recommendations careful consideration in the scoping and analysis process, and include us on the mailing list for future information pertaining to the Dalton Mountain Forest Restoration Project.

Sincerely,



Stan Frasier, President

Attachments

cc: Montana Fish, Wildlife & Parks
Region 2 Supervisor, Mack Long
Lincoln Restoration Committee