Region 2
3201 Spurgin Road
Missoula, MT 59804
406-542-5500

April 8, 2019

Dear Interested Citizen:

Thank you for your thoughtful reviews and comments on a proposal by Montana Fish, Wildlife and Parks (FWP) to conduct forested habitat restoration treatments on approximately 1,492 acres within the Threemile Wildlife Management Area (TWMA) northeast of Stevensville in Ravalli County. The objectives of the treatments include improving elk and deer winter forage, restoring open-stand conditions dominated by large-diameter ponderosa pine, restoring a stand structure that would allow fire to burn at low severity appropriate for the habitat type, reducing fuel loading and susceptibility to bark beetle infestation, and promoting aspen growth and regeneration.

FWP recently completed the public review of this project and its associated draft environmental assessment (EA). Enclosed is a decision document for the EA in which FWP explains its rationale for recommending that the Fish & Wildlife Commission approve the TWMA Forest Habitat Restoration Project (Phase Two) project. Upon completion of the public involvement process, and by inclusion of any changes and additions in this Decision Notice, I accept the draft EA as final. The decision document also includes all public comments received during the public comment period on the proposed habitat restoration project.

FWP will request approval for this proposal from the Montana Fish & Wildlife Commission at its regularly scheduled meeting on April 25, 2019 in Helena. This meeting is open to the public, as are other regularly scheduled Commission meetings. (Earlier, this meeting had been scheduled for Bozeman but has just been changed to Helena.)

Please feel free to contact me at 406-542-5500 with any questions you may have. Thank you for your interest and participation.

Sincerely,

Randy Arnold
Regional Supervisor

RA:sr

DECISION NOTICE:
Threemile Wildlife Management Area
Forest Habitat Restoration Project: Phase Two

Montana Fish, Wildlife & Parks
Region 2
3201 Spurgin Road, Missoula MT 59804
Phone 406-542-5500
April 8, 2019

DESCRIPTION OF PROPOSED ACTION

Montana Fish, Wildlife & Parks (FWP) proposes to conduct forested habitat restoration treatments on 1,492 acres of forest on the Threemile Wildlife Management Area (TWMA), northeast of Stevensville in Ravalli County. If approved by the Montana Fish and Wildlife Commission, the work would begin as early as June 2019.

The objectives of the proposed forest habitat restoration treatments are:

1. Improve elk and deer winter forage,
2. restore open-stand conditions dominated by large-diameter ponderosa pine,
3. restore a stand structure that would allow fire to burn at low severity appropriate for the habitat type,
4. reduce fuel loading,
5. reduce susceptibility to bark beetle infestation, and
6. promote aspen growth and regeneration.

The treatments would involve the removal of conifer trees (both merchantable and submerchantable) through a combination of thinning the overstory (thin-from-above or canopy thinning), understory thinning (thin-from-below), and removal of excess dead and downed trees (where exceeding desirable amounts for wildlife). Management activities would not occur during the 5-week general rifle-hunting season, and efforts to minimize impacts during the earlier 6-week archery season would include no logging on weekends. Roads and harvest would comply with Best Management Practices (BMPs). Control of noxious weeds would be included as part of the treatments. The purpose of this project is to improve wildlife habitat; this project would not be proposed if not for a need to conserve and improve wildlife habitat on TWMA.

Following this action, FWP anticipates that important ungulate winter-range condition would improve due to increased grass and woody-browse understory recruitment. Treatment would also reduce the risk of high-intensity stand-replacement fire events that would remove the remnant large-overstory trees, damage thin organic soils, slow grass and woody browse recruitment, and pose a risk to neighboring landowners.

Costs to FWP for these forest-habitat restoration treatments are expected to be covered by the sale of merchantable timber byproduct. Any revenue in excess of project costs would be deposited into the

legislatively established FWP Forest Management Account to implement further forest management projects pursuant to the provisions of 87-1-201(9)(a)(iv), Montana Code Annotated (MCA).

Alternatives

Alternative A: No Action. If FWP decides not to proceed with the proposed action, no stands on the TWMA would be treated at this time. Elk and deer winter range would continue to experience conifer expansion, and the forest stands on the WMA would remain dense, stressing water resources and shading out important deciduous vegetation. Old-growth ponderosa pine forest types as well as aspen stands and riparian areas would remain stressed by dense conifer stands, with subsequent impacts to nongame wildlife use of the WMA. FWP expects that the risk of high-severity wildfire would continue to increase.

Alternative B: Proposed Action. Conduct forested-habitat improvement treatments on approximately 1,492 acres of the Threemile WMA. Following this action, FWP anticipates that important ungulate winter-range condition would improve due to increased grass and woody-browse understory recruitment. Habitat diversity would be expected to increase at the scale of individual forest stands, as well as across the larger landscape, providing habitat niches for a wide range of game and nongame wildlife. Treatment would also reduce the susceptibility of the subject stands to high-intensity, stand-replacement fire events that would remove the remnant large-overstory trees, damage thin organic soils, slow grass and woody browse recruitment, and pose a risk to neighboring landowners.

PUBLIC REVIEW PROCESS

FWP is required by the Montana Environmental Policy Act (MEPA) to assess potential impacts of its proposed actions to the human and physical environments, evaluate those impacts through an interdisciplinary approach, including public input, and to make a decision based on this information. FWP released a draft environmental assessment (EA) for public review of this proposal (Threemile WMA Forest Habitat Restoration Project: Phase Two) on February 15, 2019 and accepted public comment for 32 days until March 18, 2019.

Legal notice of the availability of the Draft EA was published once each in the *Bitterroot Star* (Stevensville, Feb 20), *Independent Record* (Helena, Feb 15), *Missoulian* (Feb 9), and *Ravalli Republic* (Hamilton, Feb 15) newspapers. The *Ravalli Republic* published a feature article on the proposal on February 8, 2019 (available at https://ravallirepublic.com/news/local/article_b05b5edd-f302-5dff-89a7-fb7f0fa7036e.html).

FWP mailed 15 copies of the EA (and approximately 49 email notifications of the EA's availability) to adjacent landowners and interested individuals, groups and agencies. The EA was available for public review on FWP's web site (http://fwp.mt.gov, "Public Notices") from February 15 through March 18, 2019.

PUBLIC COMMENT

Summary of Public Comment

FWP received 6 comments during the public review period: 5 from individuals and one from the Montana Wildlife Federation (MWF, Helena). See Appendix A and B for all comments received. Four commenters (including MWF) supported the proposed action, no commenters were in opposition, and 2 commenters did not state support or opposition. (One of the supporters indicated "I am generally supportive . . .") Individuals making comment included 2 from Stevensville and one each from Bozeman, Hamilton, and Missoula.

Comments received in support of the proposed action included:

- ". . . I support both agreements [this Threemile WMA forest proposal, and another FWP proposal] . . . the wildlife and its habitat cannot speak, so I must and we all must, and we do." (Commenter 3).
- "Due to historic timber practices, wildfire exclusion and lack of active forest management, the WMA's current forest stand is at risk of losing long term wildlife habitat quality and stand replacement due to wildfire. The proposed action will improve elk and deer winter range habitat, thermal cover and foraging opportunities, which is consistent to the original WMA management plan. . . . MWF [Montana Wildlife Federation] would like to commend the department on the project and fully supports its implementation." (Commenter 5)
- "I am generally supportive of the proposed vegetative treatments of the project." (Commenter 6)
- "Good idea; do." (Commenter 1)

Response to Public Comment

The following comments encompass specific issues, questions or suggestions received during the public comment period, along with FWP's responses.

Comment: Is there any livestock use of the Threemile WMA. (Commenter 1)

FWP Response: FWP purchased TWMA in 1967 and 1968, and in earlier years, FWP leased northern parts of the WMA for grazing. Leasing this WMA for livestock grazing is not currently contemplated, but if it were to occur it would have to follow a grazing plan specifically developed for the unique environmental conditions and requirements of the WMA. Such a plan would also be subject to a public review process (such as for this current TWMA forest project proposal), and the Fish and Wildlife Commission would have final decision-making authority.

Comment: I would like to submit a comment that you consider compatible recreational activities as you pursue and complete vegetation management actions in the Threemile Wildlife Management area. As you reclaim logging transportation and skid roads, please consider whether you are affecting a recreation path, or if you could create a path. (Commenter 4.5)

FWP Response: As stated in the EA, new road construction needed for the timber operations "would be revegetated and stabilized [following implementation], remaining accessible for administrative purposes, fire suppression, and non-motorized recreational access" Transportation System, (page 13). As the primary objective of this proposal (and of the TWMA in general) is to provide for and restore wildlife habitat, the creation of new trails for recreational use is not identified as a goal for this project, but we do not believe the project would adversely affect existing opportunities.

Comment: I feel as if public review is somewhat rushed. Short comment periods are not uncommon, but since the area is closed to the public, how can you expect meaningful responses (Commenter 6.9)

FWP Response: The 30-day comment period for the EA is consistent with other FWP projects of similar scope (having no significant physical or human impacts, with minor impacts, most of which can be mitigated), per MEPA requirements. Outreach efforts included a news release, legal notices published in 4 newspapers (local, regional statewide), copies of the EA mailed to adjacent landowners and other interested parties, and inclusion on the FWP website ("Recent Public Notices" and "News").

While the formal public comment period was limited to 30 days, FWP has been soliciting informal public involvement regarding forest management on TWMA since the pilot project (Phase One) was proposed and endorsed to go out for public review at the Fish and Wildlife Commission's July 2014

meeting. The draft Environmental Assessment[1] (EA) for the 372-acre pilot project implemented in 2015-2016 was presented as a demonstration area "for the public to react to, before proposing any further forest management projects on Threemile WMA in the future".

Since that time, FWP has received encouraging feedback for additional forestry treatments on the WMA. FWP held a tour with local sportsman's groups, county commissioners, legislators, timber industry representatives, and partnering agencies and received positive responses. A local resident wrote a letter to the editor of the Ravalli Republic[2] praising the project. FWP staff conducted an informal survey of 25+ hunters on the Threemile WMA in the fall of 2017 and heard support and often enthusiastic support for the pilot project and additional forestry treatments on the WMA. For these reasons, FWP believes the level of public involvement for Phase Two was appropriate.

Comment A: Have any of the commissioners reviewed the project? Can the public make comments directly to the Commission at this meeting? (Commenter 6.10).

FWP Response: Montana's Fish and Wildlife Commissioners (June 14, 2018 meeting) endorsed this Phase Two project for FWP to proceed with public review and comment, based on documents[3] and verbal input submitted by FWP. The Commissioners also receive notification (and/or copies) of all FWP EAs and Decision Notices (DNs), so they have access to the same documents as do the public.

Yes, the public can make comments to the Commission at any of its regularly scheduled meetings. FWP is planning to bring this project to the Commission at its regularly scheduled April 25, 2019 meeting[4] in Helena to ask for approval to proceed with this proposal.

Comment B: I'm sure in your recent Elk Research Project (NSERP) that it documented the heavy use of the drainages and north facing slopes of the project area. I believe the value of these areas have not been emphasized enough. (Commenter 6.12)

FWP Response: The NSERP (Northern Sapphire Elk Research Project) project was mentioned in the draft EA (Area Description, page 2): "The North Sapphires Elk Research Project [NSERP], which took place from 2014-2016 with a Phase Two study commencing in winter 2018, documented heavy use by both bull and cow elk during all seasons including archery and rifle seasons (FWP, unpublished GPS collar data)." The EA summarizes the importance of riparian corridors and north-facing slopes for thermal and wind cover, especially for elk (Dense Cover, page 7; and other places in the EA . (FWP generally does not provide exact GPS locations of collared elk to the public, and its analysis of collar data was intended to examine large-scale seasonal landscape use.)

Comment C: The proposal map is a good vicinity map, but more details of the project should be shown to the public for a better understanding of the project. Stand numbers, road numbers or identifying names should be shown. Improvements should be shown, it's great that the new bridge was mentioned in the text. New road construction and reconstruction were hard to see with old eyes all red. Were the gates and culverts left off because of scale or public sensitivity? I see that trail access is now the same with the new gates as with previous signage which never really did the job of controlling access. (Commenter 6.13)
While amounts of new roads and reconstructed roads are mentioned a detailed map of these actions is needed to fully understand what is about to occur. (Commenter 6.19)

FWP Response: Some details were excluded from the maps in the draft EA in order to reduce label clutter so the public could generally see where activities (forestry treatments and road work) were

[1] Draft Environmental Assessment. Threemile Wildlife Management Area Forest Habitat Restoration Project. February 2015. Available online: http://fwp.mt.gov/fwpDoc.html?id=89833

[2] https://ravallirepublic.com/news/opinion/mailbag/article_9968175a-041e-11e6-a7ef-c3b38c160e93.html

[3] Supporting documents available to the Commission are available on this webpage (under *01:00 PM-Wildlife Division* time slot): http://fwp.mt.gov/doingBusiness/insideFwp/commission/meetings/agenda.html?meetingId=44545153

[4] The April 25,2019 (a Thursday) F&W Commission agenda will be posted on this webpage approximately one week prior to the meeting: http://fwp.mt.gov/doingBusiness/insideFwp/commission/meetings/

taking place. In response to your comments, we have included an additional map (see Figure 1 in this DN) showing site improvements and gates, as well as more road treatment details. This map also includes the potential alternative route suggested in Comment N.

Comment D: Should also include a statement about existing roads (or trails now) that were essentially created without any erosion or water runoff structures such as dips and water bars to prevent degradation. (Commenter 6.14)

FWP Response: While it was not stated in the EA, your comment is accurate. The existing road system was constructed approximately 40 years ago to facilitate the previous landowner's timber harvest (under their now-expired timber rights) and was constructed without any drainage features nor have drainage features been installed on many of the roads since then. As a result, many steep segments of road have been chronic sources of erosion and degradation. Many of these issues would be mitigated through the implementation of Forestry Best Management Practices (BMPs) in conjunction with the proposed project.

Comment E: The statement that "Forest[s] in the riparian bottoms and on steep north facing slopes [along the draws.] would be left standing,.." is correct in recognizing the value of these stands not only as travel corridors but as winter refugia. Unfortunately some of the proposed road activities jeopardize these areas. (Commenter 6.15)

FWP Response: You are correct in pointing out that some of the new road construction would affect these retention areas. In particular, 3 segments of new road would bisect these areas. Based on field reconnaissance for the transportation system, these routes were determined to be necessary in order to facilitate the forestry treatments. FWP would construct these roads to the minimum width necessary to facilitate logging and log hauling while meeting BMPs. We expect this to result in a treeless corridor approximately 30- to 40-feet in width through these areas. None of these segments would become open for public motorized use. Rehabilitation work would occur on these roads after use, including activities such as decompacting the road surface, culvert removal, waterbarring (installing cross-drainage devices to reduce erosion and sediment transport), revegetation, and placement of coarse-woody debris. FWP would evaluate the potential for an alternative route for one of these segments, which is referenced in response to Comments C and N. FWP agrees that these areas would be impacted; however, we do not anticipate any "potentially significant" impacts, and we expect that the untreated stands would still provide a habitat mosaic and be used by elk for thermal cover as stated in the draft EA.

Comment F: I am glad that you acknowledged the Forest Service partnership. But, I'm unsure if the state used any Forest Service data in its cumulative impacts analysis. (Commenter 6.17)

FWP Response: FWP used an Environmental Review Checklist format to assess the potential impacts to the physical and human environment. Using this format, FWP did not use Forest Service data to conduct an exhaustive cumulative impacts analysis. Based on the limited number of minor impacts identified, FWP determined this to be the appropriate level of review.

Comment G: Proposed Actions [Description], #8 Narrative Summary [Proposed Action, page 11]. The summary lacks details where are these actions going to occur? What site improvements will be made i.e. bridges, culverts, gates? How will reduced erosion and sediment transport be achieved? You mention the means for prescribed fire and noxious weed control. (Commenter 6.18)

FWP Response: Regarding locations of specific site improvements (including bridges, culverts, and gates), please see Comment C and the new Figure 1 in this DN. Erosion and sediment control would be achieved through project design and layout. BMPs have been incorporated into FWP's forestry contract specifications, which require contractors to implement BMPs in order to minimize impacts to soil and water resources.

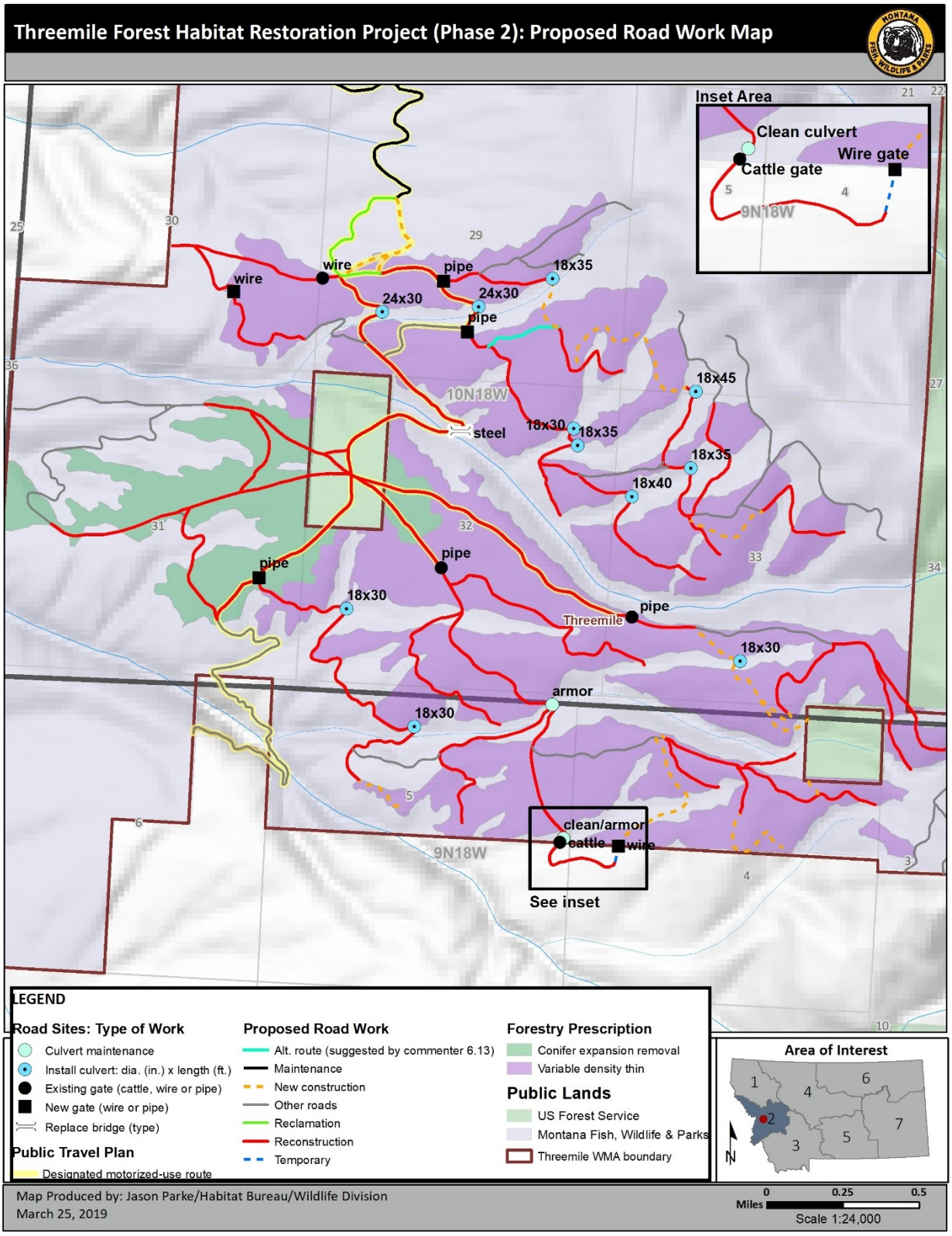


Figure 1. Road work proposed for Threemile WMA, in conjunction with the Forest Habitat Restoration Project, Phase 2.

Comment H: The statement "After use, the roads..." Should be modified to state, "After use, ALL ROADS will be revegetated and stabilized. (Commenter 6.20)

FWP Response: This is true for most roads except for TWMA's Designated Routes that provide motorized public access to and through the WMA. On these roads, revegetation of the road surface would not occur, in order to keep the road clear of vegetation for safety and fire hazard concerns. Revegetation would still occur on the cuts and fills of these roads, and erosion control would be maintained through a combination of drainage features (e.g., rolling dips, ditch relief culverts, and waterbars).

Comment I: Page 14 General Guidance. The value of statements 1 and 2 can not be minimized by other statements. These are key components. (Commenter 6.21)

FWP Response: Thank you for your comment; FWP concurs.

Comment J: So, 3.1 and 22.1(new and existing) 25.2 miles of road are going to be used to remove timber on 1,492 acres, approximately 2.5 square miles. That would mean you need 10 miles of road for every section treated. Even if we use the entire area around the proposed action 5 sections, 3200 acres we would still have 5 miles of road for each section treated. Road densities are often helpful in wildlife analysis as also miles of open or closed roads. (Commenter 6.22)

FWP Response: You are correct that 25.2 miles of road would have motorized activity while project work is ongoing. Within the gross project area, which would include all 12 sections in which access roads pass through; this would result in a road density of 2.1 miles per square mile with motorized activity while project work is ongoing (2019-2020). Following completion of the logging and hauling activities, motorized use would primarily be limited to the Designated Route (10.4 miles of seasonally open road) with occasional administrative motorized use on other roads for maintenance activities (e.g., weed management and fence maintenance).

Comment K: It should be disclosed to the public that even with the two new proposed gates, open and closed road access is approximately the same as before only enforced to a higher degree. Perhaps some type of before and after visual or shaded map could show this. (Commenter 6.26)

FWP Response: With the exception of a reduction in 0.1 miles of seasonally open road as a result of relocating 0.6 miles of road, you are correct that there would be no appreciable change to public motorized access. Since the public access would be approximately the same following implementation of the proposed project, FWP did not produce a detailed map showing changes to existing public access.

Comment L: How many miles of existing or new roads will be going through sensitive steep north-facing slopes? (Commenter 6.27)

FWP Response: FWP estimates that approximately 2.6 miles of existing road (including 0.4 miles of the Designated Route) would be reconstructed, and 0.35 miles of new road would be constructed, on north aspects outside of proposed forestry treatment units. New road construction is mostly limited to slopes less than 35%.

Comment M: My objections to the project are new road related. The long-term impacts from this project will not be from habitat improvements, but from access routes created that will affect both human and wildlife use. (Commenter 6.29)
Please refer to the [my] attached stand map which better shows treated stands and identifies lettered road segments A, B, C.... (Commenter 6.30)

FWP Response: (Please see Appendix B for Commenter 6's map, referred to in Commenter 6.30.) We are confident that the project design maintains an adequate mosaic of habitat types for wildlife

and that the new road construction, temporary in nature and subject to reclamation, would not contribute to any long-term increases in increased hunting mortality or habitat loss for big game. We have taken efforts to minimize new road construction (see response below) while safely allowing transport of logs from stands targeted for improvement.

Comment N: I am opposed to the new road "C", which comes up from stand 1 in the bottom of a draw, gradually side hilling up relatively steep shadowed north facing slope. Half of this new road is located in what was previously described as valuable wildlife habitat and is not in any treatment unit. Road "D" which is an existing road and connects the main road to the end of the proposed new road, has 3-4 merchantable trees > 5 inches. It goes to the exact same connecting point, through the stand that is being treated and has ample area to meander right or to the left using more gentle curves to address minor grade issues. In this manor you can address access needs with reduced costs and NO impact to identified valuable wildlife habitat. Not all roads are as easy to address as this one, as we are looking at fairly steep topography in many areas and previous designed roads. (Commenter 6.33)

FWP Response: FWP will evaluate the route Commenter 6 refers to as "Road D," as an alternative to the route identified as "Road C" on his map (Appendix B). This is also shown on the new Figure included in this DN (Comment C). If this route is determined to be feasible, with minor expansion outside the existing road prism, then during project implementation (summer of 2019) "Road C" would not be constructed and "Road D" would be reconstructed (with potentially minor relocation). This would result in a decrease in overall new road construction by approximately 0.22 miles (on a north aspect outside of a proposed forestry treatment unit), one culvert would not be installed, and overall reconstruction would be increased by approximately 0.25 miles.

Comment O: Road "F", is part of an old existing road through deep dense hillside draw, (great ambush location, heavy wildlife use) it connects stand 3 to stand 4. Road "FI" also is an existing road up from stand 5 that connects to stand 4. There is also another existing road to the west. If "FI" is reconstructed do you really need to reconstruct road "F"? (Commenter 6.35)

FWP Response: "Road F" (Appendix B) is required in order to access "Road FI." The existing road referred to in the comment (not labeled) is far too steep to be reconstructed for use. Therefore "Road F" would need to be reconstructed followed by rehabilitation work after use.

Comment P: Stand 12 provides some interesting opportunities. From the intermittent creek crossing (which could use a larger culvert) at the base of the large steep existing grade. I would recommend not reconstructing the road that runs southwest through the drainage bottom then sidehill up the north facing slope, road location "L". Rather build a new road on the top from the junction of road "I" which is an old road in rough shape with no proposed treatment. Road "I", should have some rehabilitation measures or reconstructed to where new road "J" is proposed. Road "J" parallels an existing road till it starts to cross a drainage for approximately Y, its length. Road "I" should not be built as designed. It is apparent from the page 4 map that private access is used to get to the new wire gate proposed to access the stand. I believe a better route would be east through the treated stand to junction with the new road "M". (Commenter 6.38)

FWP Response: FWP evaluated these road options during field reconnaissance and the proposed road locations were determined to be the necessary routes to facilitate implementation of the forestry treatments while utilizing the existing road system to the extent possible. Road "I" (Appendix B) was not shown as having any road work in the EA; however, this road would be utilized as a skid trail and would have BMPs implemented, such as waterbarring and revegetation, to reduce future erosion potential.

DECISION

Based upon the EA and the applicable laws, regulations, and policies, we have determined that the proposed action will not have negative effects on the human and physical environments associated with

this project. Therefore, we conclude that the EA is the appropriate level of analysis, and the preparation of an Environmental Impact Statement is unnecessary.

This project is a continuation of many years' investments by a number of cooperating professional foresters and wildlife biologists toward understanding forest processes and wildlife habitat values on the Threemile WMA. FWP found general support in its informal scoping conversations with local elected officials and members of the public in the years following the pilot project, in addition to preliminary reports that wildlife has benefited from these activities. Formal comments on the EA, though few, were supportive, without opposition. The proposal was well publicized.

No concerns were raised that would bring the environmental analysis into question. In consideration of these facts--and by inclusion of the changes and additions noted in this Decision Notice--I adopt the Draft EA as final.

Based on the analysis in the draft EA and the public comment received, I have selected the "Proposed Action" (Alternative B). I will recommend to the Fish & Wildlife Commission that it approves FWP's proposed Forest Habitat Restoration Project (Phase-Two) for Threemile WMA, as described in the EA. This would occur at the Commission's next regularly scheduled meeting, which would be April 25 in Helena. (Earlier, this meeting had been scheduled for Bozeman but has just been changed to Helena.)

Randy Arnold
Region 2 Supervisor
Montana Fish, Wildlife & Parks

4/8/2019
Date

APPENDIX A. Comments on the proposed Forest Habitat Restoration Project (Phase Two) for Threemile WMA received by FWP during the comment period of February 15 through March 18, 2019. (Comments received via E = email, M = mail.)

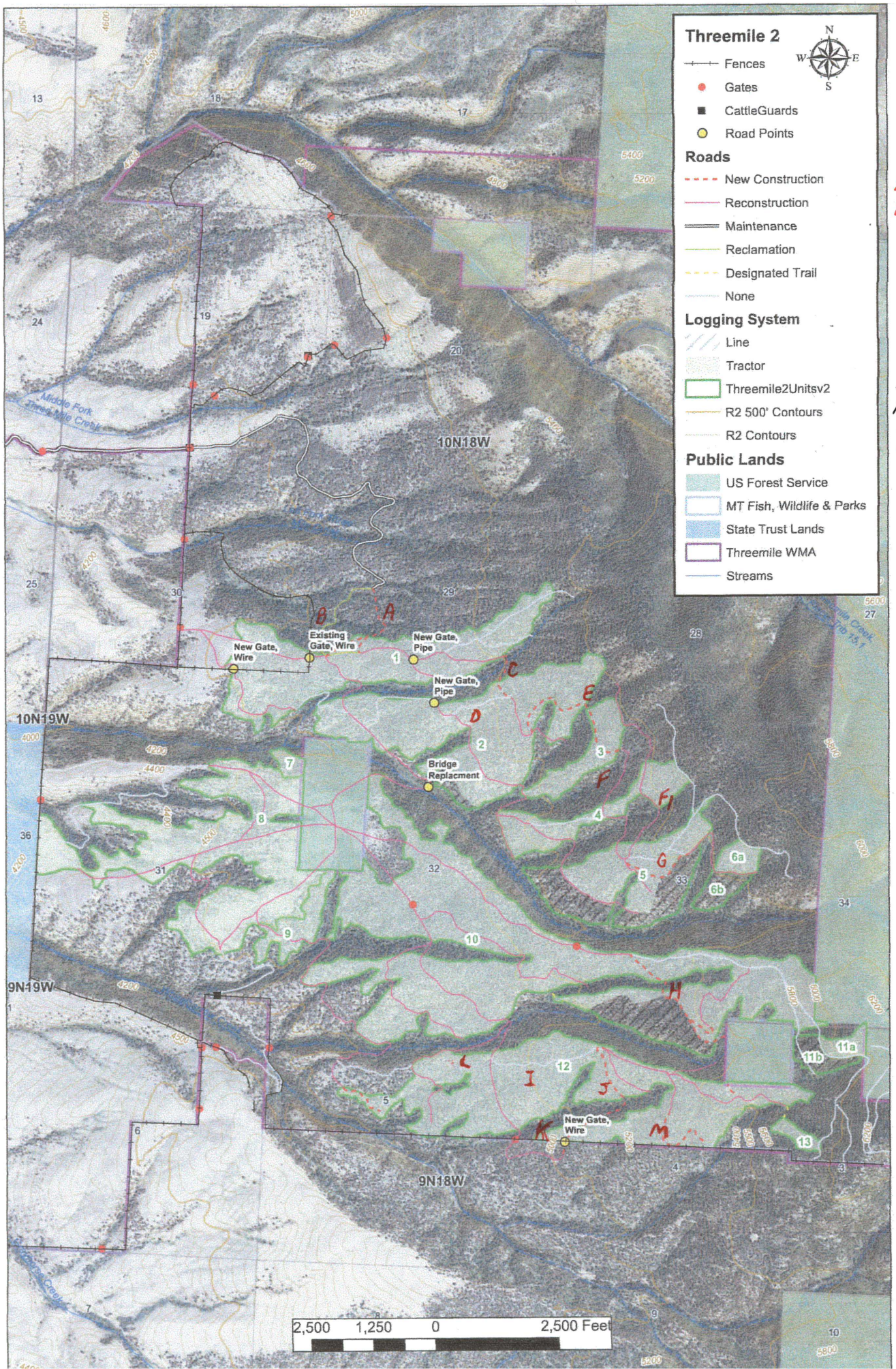
Com-men-ter #	Via	Para-graph	Comment
1	E		Thanks. Is there any livestock use of the Threemile WMA?
2	E		Good idea; do.
3	E	1	I'm headed to the hospital but wanted you and [name] to know I support both agreements [i.e., this Threemile WMA forest proposal and the Blackfoot-Clearwater WMA grazing proposal]. I'm not going to have time to go to your website and do all that stuff online.
		2	I'm voicing my support, as I always do, for ANY increase in public lands with funds from hunting and fishing licenses.
		3	I can't hunt anymore due to back and neck difficulties but I buy my licenses to help wildlife. I look forward to buying a grizzly bear license for that reason and I always buy a wolf license, although I have NEVER seen a wolf in the wild. Sure would love to before I die.
		4	Take care and in the spirit of Theodore Roosevelt, I say, the wildlife and its habitat cannot speak, so I must and we all must, and we do.
		5	Author and editor of 22 books on big-game hunting
		6	Hunter and mother of hunters
		7	Mother of Two black Labrador retrievers named Danni Boone and Betty Crockett
4	E	1	As stated in the DEA the Threemile WMA Management Plan (1992):
		2	For the expected 10-year life of this plan, as in the past under FWP ownership, the goal of the WMA will be to provide high quality winter range for elk and mule deer, as well as compatible public recreational opportunities."
		3	The Threemile Wildlife Management area is a pleasant place to hike or ride horses, which are non-motorized recreation activities compatible with wildlife. This enables people to view and experience the outdoors. If the recreation must be related to wildlife consumption, if they are hunters, then to experience hunting activities.
		4	Prior to the most recent timber harvest it was possible to ride horses through this area following game trails or logging roads.
		5	I would like to submit a comment that you consider compatible recreational activities as you pursue and complete vegetation management actions in the Threemile Wildlife Management area. As you reclaim logging transportation and skid roads, please consider whether you are affecting a recreation path, or if you could create a path.
		6	This area has wonderful potential for non-motorized access to the top of Sapphire Mountains , to the Welcome Wilderness or just with in the Threemile Wildlife Management area.
		7	Please feel free to contact me if you have questions. Thank-you for your consideration.
5	E	0	Please see the attached comments from the Montana Wildlife Federation regarding the Threemile WMA Forest Habitat Restoration Project. Thank you.
		1	The Montana Wildlife Federation (MWF) is Montana's oldest and largest sportsmen-wildlife conservation organization. We work to protect Montana's public lands, clean waters, and abundant fish and wildlife for the benefit of the hundreds of thousands of Montanans and people all over the nation who hunt, fish, and value Montana's outdoor heritage. We appreciate the opportunity to comment on the Environmental Assessment for Phase Two of the Threemile WMA Forest Habitat Restoration Project.
		2	MWF supports the Department's proposed action to conduct forest habitat restoration treatments on 1,492 acres within the Threemile WMA. Due to historic timber practices, wildfire exclusion and lack of active forest management, the WMA's current forest stand is at risk of losing long term wildlife habitat quality and stand replacement due to wildfire. The proposed action will improve elk and deer winter range habitat, thermal cover and foraging opportunities, which is consistent to the original WMA management plan.

		3	In addition to the habitat benefits for elk and deer, treatments will help reduce fuel loads to allow low severity burning, reduce susceptibility to bark beetle infestation and promote aspen growth and regeneration. The project is expected to have minimal impacts and Phase One was supported by a variety of different stakeholders. MWF would like to commend the department on the project and fully supports its implementation. Thank you for the opportunity to comment.
6	E	1	Dear Mr. Randy Arnold, Regional Supervisor and Montana Fish and Wildlife Commission:
		2	Thank you for your letter of February 14, 2019 asking for comments on the Draft Environmental Assessment Threemile Wildlife Area Forest Habitat Restoration Project Phase II.
		3	I am an avid user of the project area and was supportive of Phase I. I am a retired Forest Service individual with most of my career in timber management and as a wildlife biologist. have previously discussed the project with Mr. Jason Parke and Ms. Rebecca Mowry. I am going to use a different project proposal map since it better identifies stands and improvements.
		4	Let me first state that **I am generally supportive of the proposed vegetative treatments of the project.** I am quite familiar with stands 1, 2, 3, 4, and 10. I have walked flagged boundary lines of these stands as well as painted blue lines and reviewed some of the sample marking of stands 1, 2, and 10. I have also walked many of the proposed new road construction lines.
		5	Again thank you for the opportunity to comment on your proposal.
		6	Attached are: **Review Letter Comments, General Draft EA Comments, Specific Road Construction Comments, and Comment Maps**
		7	**Review Letter Comments:**
		8	The Threemile Wildlife Area is managed as a primarily winter range for elk and is closed to the public from December 1st to May 15th.
		9	I feel as if public review is somewhat rushed. Short comment periods are not uncommon, but since the area is closed to the public, how can you expect meaningful responses. It is clear from your letter that you are fast tracking this project since you will be asking for Commission approval at its April 25th meeting.
		10	Have any of the commissioners reviewed the project? Can the public make comments directly to the Commission at this meeting?
		11	**General Draft EA comments:**
		12	Page 2. The Proposal: "The purpose of the project is to improve wildlife habitat". I'm sure in your recent Elk Research Project (NSERP) that it documented the heavy use of the drainages and north facing slopes of the project area. I believe the value of these areas have not been emphasized enough.
		13	Page 4. The proposal map is a good vicinity map, but more details of the project should be shown to the public for a better understanding of the project. Stand numbers, road numbers or identifying names should be shown. Improvements should be shown, it's great that the new bridge was mentioned in the text. New road construction and reconstruction were hard to see with old eyes all red. Were the gates and culverts left off because of scale or public sensitivity? I see that trail access is now the same with the new gates as with previous signage which never rally did the job of controlling access.
		14	Page 6. The statement that reads, "Decades of fire prevention, coupled with historic, high-grade harvesting and a lack of subsequent management to restore natural stand structure". Should also include a statement about existing roads (or trails now) that were essentially created without any erosion or water runoff structures such as dips and water bars to prevent degradation.
		15	Page 7, Dense Cover. The statement that "Forest in the riparian bottoms and on steep north facing slopes would be left standing,.." is correct in recognizing the value of these stands not only as travel corridors but as winter refugia. Unfortunately some of the proposed road activities jeopardize these areas.
		16	Demonstration Project: I voiced my approval of this project as it was being flagged-in on the ground. I may have recommended slight modifications from an after sale review, but the project was still a success and would still get an A.
		17	I am glad that you acknowledged the Forest Service partnership. But, I'm unsure if the state used any Forest Service data in its cumulative impacts analysis.
		18	Pages 8-11 Proposed Actions [Description], #8 Narrative Summary [Proposed Action, page 11]. The summary lacks details where are these actions going to occur? What site improvements will be made i.e. bridges, culverts, gates? How will reduced erosion and sediment transport be achieved? You mention the means for prescribed fire and noxious weed control.

19	Page 13, Transportation System. While amounts of new roads and reconstructed roads are mentioned a detailed map of these actions is needed to fully understand what is about to occur.
20	Middle of the last paragraph on page 13, The statement " After use, the roads...". Should be modified to state, "After use, ALL ROADS will be revegetated and stabilized.
21	Page 14 General Guidance. The value of statements 1 and 2 can not be minimized by other statements. These are key components.
22	Page 16 Statement 1.b. So, 3.1 and 22.1(new and existing) 25.2 miles of road are going to be used to remove timber on 1,492 acres, approximately 2.5 square miles. That would mean you need 10 miles of road for every section treated. Even if we use the entire area around the proposed action 5 sections, 3200 acres we would still have 5 miles of road for each section treated. Road densities are often helpful in wildlife analysis as also miles of open or closed roads.
23	Pages 17-27. Tables 2-13 can be useful to address unusual questions and to boiler-plate an EA that all potential issues were addressed and considered.
24	**Specific Road Construction Comments:**
25	Roads and Access, all have an effects on wildlife use and human-use patterns that affect wildlife.
26	While miles of open and closed roads are mentioned in the analysis (page 13). It should be disclosed to the public that even with the two new proposed gates, open and closed road access is approximately the same as before only enforced to a higher degree. Perhaps some type of before and after visual or shaded map could show this.
27	How many miles of existing or new roads will be going through sensitive steep north-facing slopes?
28	Since the purpose of this project is habitat enhancement for wildlife and the components of wildlife habitat left untreated i.e. dense forest cover in the steeper draws.
29	My objections to the project are new road related. The long-term impacts from this project will not be from habitat improvements, but from access routes created that will affect both human and wildlife use.
30	Please refer to the attached stand map which better shows treated stands and identifies lettered road segments A, B, C.... *[See **Appendix B** for the **Comment Map** provided by Commenter #6.]*
31	I am fully supportive of the new road proposed as road "A". It will serve the public far better than the previous old road to be reclaimed road "B".
32	I am fully supportive of the new gates located in stands 1 and 2 which reflect existing closures already in effect.
33	I am opposed to the new road "C", which comes up from stand 1 in the bottom of a draw, gradually side hilling up relatively steep shadowed north facing slope. Half of this new road is located in what was previously described as valuable wildlife habitat and is not in any treatment unit. Road "D" which is an existing road and connects the main road to the end of the proposed new road, has 3-4 merchantable trees > 5 inches. It goes to the exact same connecting point, through the stand that is being treated and has ample area to meander right or to the left using more gentle curves to address minor grade issues. In this manor you can address access needs with reduced costs and NO impact to identified valuable wildlife habitat. Not all roads are as easy to address as this one, as we are looking at fairly steep topography in many areas and previous designed roads.
34	Road "E", which is a new spur road off of road "D" and serves the northeastern portion of stand 2 and accesses the top {northern) half of stand 3. I understand the need for these new road sections to serve stands 2 and 3.
35	Road "F", is part of an old existing road through deep dense hillside draw, (great ambush location, heavy wildlife use) it connects stand 3 to stand 4. Road "FI" also is an existing road up from stand 5 that connects to stand 4. There is also another existing road to the west. If "FI" is reconstructed do you really need to reconstruct road "F"?
36	Road "G" is new construction in stand 5 to provide better access to the cable yarding portions of stand 5.
37	Road "H" is new construction in stand 10 to support cable yarding options and it appears to also provide access for the Forest Service 40. Creating a nice loop for hikers or horseback riders in the eastern portion of stand 10.

38	Stand 12 provides some interesting opportunities. From the intermittent creek crossing (which could use a larger culvert) at the base of the large steep existing grade. I would recommend not reconstructing the road that runs southwest through the drainage bottom then sidehill up the north facing slope, road location "I". Rather build a new road on the top from the junction of road "I" which is an old road in rough shape with no proposed treatment. Road "I", should have some rehabilitation measures or reconstructed to where new road "J" is proposed. Road "J" parallels an existing road till it starts to cross a drainage for approximately Y, its length. Road "I" should not be built as designed. It is apparent from the page 4 map that private access is used to get to the new wire gate proposed to access the stand. I believe a better route would be east through the treated stand to junction with the new road "M".
39	**Commenter Map** *[See Appendix B]*

APPENDIX B. Comment Map included with Commenter #6's comment letter.



ROAD LETTERS A, B, C

STAND NUMBERS 1, 2, 3