



2763 Grizzly Gulch, Helena, MT 59601

August 1, 2024

Kathy Bushnell
District Ranger
Helena Ranger District
2880 Skyway Drive
Helena, MT 59602

Subject: Larabee- Hat Vegetation Project #65687

Dear Kathy,

Helena Hunters and Anglers (HHAA) is an all-volunteer group dedicated to protecting and restoring fish and wildlife to all suitable habitats, and to conserving all natural resources as a public trust, vital to our general welfare. HHAA promotes the highest standards of ethical conduct and sportsmanship and promotes outdoor recreation opportunity for all citizens to share equally. HHAA members hunt, fish, hike, and camp within the Larabee-Hat project area, and have done so for many years. The area is prime habitat for elk, mule deer, moose and black bear and is used by grizzly, lynx and wolverine. The Little Blackfoot River is popular with local fishermen and contains important Bull Trout habitat.

The fuel treatments at the north end of the project area are heavy handed and will negatively affect big game security and winter thermal cover. We wonder how much of the forest in this area meets the definition of old growth? Canada

lynx and grizzly bear habitat will be diminished under the proposed plan, and both species exist within the project area.

We appreciate that the project appears designed to respect the integrity of the Electric Peak Inventoried Roadless Area (IRA) and Electric Peak Recommended Wilderness. Broadcast burning within these areas, without the use of prior mechanical treatment, is an excellent option for getting fire back on the landscape without causing undo human impact to these important areas. We object to 178 acres of "... fuels treatments, which would be applied using mechanical treatments where possible..." within the Electric Peak IRA (Page 5). Where are these 178 acres within the IRA, and why is mechanical treatment proposed there? We were not able to find this information in your public documents. What makes this 178 acre unit different from all the other burn units in the IRA and Recommended Wilderness?

We ask that you re-seed with native seed mixtures, especially in the IRA and proposed wilderness, something you should probably be doing forest wide, anyway.

We are pleased to see the Forest propose watershed improvements such as culvert replacements (new, larger culverts to improve flow and facilitate fish passage), installation of Beaver Dam Analog structures, and fencing of springs, seeps, wet meadows and riparian areas to mitigate the effects of livestock grazing on these sensitive and easily damaged habitats.

Thank you for the opportunity to comment.

Sincerely,
Steve Platt, President, Helena Hunters and Anglers