

Via Email: <https://www.fs.usda.gov/project/?project=56912>

October 9, 2020

Jamie Tripp and Molly Ryan, District Rangers
Beaverhead-Deerlodge National Forest
420 Barrett St.
Dillon, MT 59725

Dear Jamie and Molly,

On behalf of the Beaverhead-Deerlodge Working Group (BDWG), thank you for the opportunity to comment on the Selway Saginaw Project.

The BDWG works to develop common understanding among diverse stakeholders and serves as a bridge to broader constituencies on the Beaverhead-Deerlodge National Forest (BDNF). Litigation and appeals are commonly filed on the BDNF. BDWG members hope to provide a way to resolve forest-level issues in a positive manner before they get to the appeal stage, resulting in more restoration work being done on the ground and in a way that achieves ecological objectives as well as community benefits.

The BDWG members represent the following interests: Beaverhead, Madison, and Jefferson county commissioners, timber, at-large, fishing, conservation, motorized recreation, agriculture and ranching, quiet recreation, noxious weeds, hunting, and mining.

The Selway Saginaw Vegetation Management project area includes 66,289 acres. The project area is administered by the Dillon and Wisdom Ranger Districts on the BDNF. It is located entirely within Beaverhead County, southwest of Wisdom and west of Dillon, Montana.

The project area is in the Lima Tendoy landscape within the Horse Prairie North and Selway Saginaw Management Areas and within the Big Hole landscape within the Big Hole Flats Management Area.

Conditions in the project area do not meet Forest Plan goals or objectives for timber, vegetation, or fire management. The Selway Saginaw project proposes to move the project area toward those goals and objectives through commercial timber harvest, precommercial thinning, and conifer reduction in sagebrush and riparian habitats.

In 2017 the BDWG developed a Big Hole Divide Landscape Vision document. That document was updated and finalized at the October 7, 2020 BDWG meeting by a consensus vote of members and is attached for reference. The Selway Saginaw project area encompasses the majority of the area encompassed in the Big Hole Divide Landscape Vision. District Rangers Molly Ryan and Jamie Tripp have regularly updated the BDWG on the Selway Saginaw project developments.

Through a consensus vote of approval for this letter, the BDWG supports the purpose and need for the Selway Saginaw Project and supports the initial proposed actions. The BDWG supports the

treatments proposed in the area, including commercial timber harvest, fuel treatments, prescribed burning, and conifer encroachment treatments. The BDWG also recommends that the BDNF review the attached Big Hole Divide Landscape Vision document and incorporate its recommendations wherever practical. The BDWG encourages the BDNF to coordinate its treatments in the Selway Saginaw Project with adjacent landowners.

The BDWG submits this comment in order to have standing during the objections process.

Sincerely,

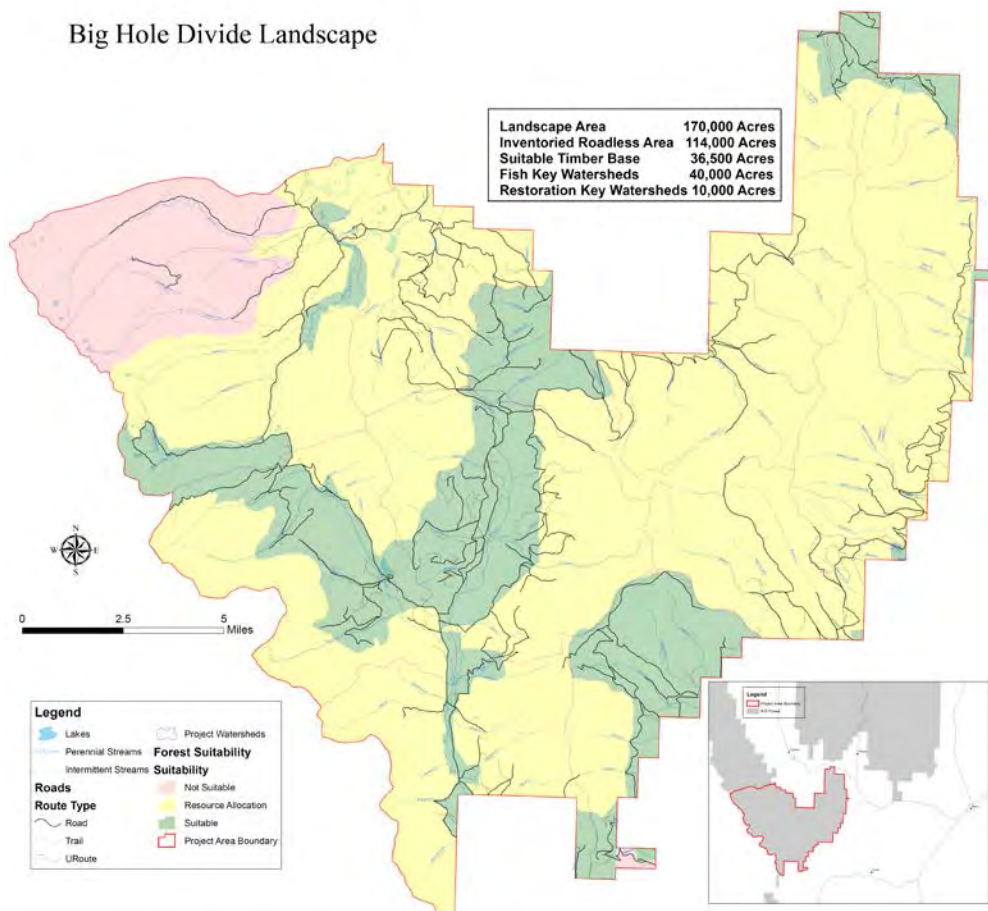
Tony Colter
Beaverhead-Deerlodge Working
Group Co-chair & timber representative

Darcie Warden
Beaverhead-Deerlodge Working Group Co-chair &
conservation organization representative

**Big Hole Divide Landscape
Conditions and Vision Statement
Drafted June 15, 2017 and approved October 7, 2020**

Purpose: The purpose of the B-D Working Group (BDWG) is to develop agreement around priority areas and approaches for work on the Beaverhead-Deerlodge National Forest (BDNF) and to help facilitate completion of projects at the local level.

One such priority area is the Big Hole Divide landscape.



The goals of this Landscape Strategy are to articulate shared goals and specific objectives for the future of the Big Hole Divide landscape. In addition, this document will identify the key attributes of ecosystem integrity and function for the primary ecosystem types that occur on the landscape. The Beaverhead-Deerlodge Working Group (BDWG) feels strongly that the Big Hole Divide landscape should be managed to achieve social, economic, and ecological objectives. The BDWG, and surrounding human communities, value the Selway Meadows landscape for the recreational opportunities it offers, the value of wood products and grazing allotments to local economies, and the important wildlife and fish

habitat the area provides. The BDWG also recognizes the fire threat posed by current forest conditions, particularly in the wildland urban interface and Dillon municipal watershed.

Current conditions

The Selway Creek watershed is located south of the Big Hole Divide and is a headwater tributary of Horse Prairie Creek, one of the two major drainages that form the Beaverhead River in southwest Montana. This vast drainage is 21,102 acres and has a large meadow complex along Selway Creek that is surrounded by timbered hillsides that is within the B-D suitable timber base. The meadow complex was privately owned before the Forest Service acquired 1,280 acres of land for wildlife and fisheries benefit in 2007. This acquisition was given high priority due to the area's substantial wildlife and fisheries values. The area is often referred to as *Selway Meadows* and is known for its scenic landscapes, prime wildlife habitat, a variety of recreational opportunities, cattle grazing, and timber production. The area has close to 6000 suitable rangeland acres within the watershed supporting approximately 1500 Animal Unit Months (AUM).

The BDNF recognizes the Big Hole Divide Landscape as a prime place for:

- Native westslope cutthroat trout
- Pearlshell mussel
- Riparian and stream channel restoration for birds and other wildlife
- Sustainable timber production
- Livestock grazing and irrigated pasture management
- Outstanding recreational resource values including hunting, fishing, motorized and non-motorized opportunities.

Many opportunities have been identified for native species management and restoration, riparian restoration, range land improvements including projects to improve cattle distribution and irrigation infrastructure, and timber management within the B-D suitable timber base. A Watershed Condition Framework and Restoration Action Plan was developed in 2014.

Research, data collection and monitoring efforts have focused on stream channel condition, water quality and quantity, native fish and pearl shell mussels, elk and mule deer populations and big game habitat, and riparian condition including willow production past and present.

Vision

Recommendations – By Category

1. General – Across Landscape

- Support effective collaboration of diverse citizens to guide land stewardship.
- Engage stakeholders in planning.
- Protect and re-establish the ecosystem processes that result in diverse and resilient forests and rangelands and properly functioning watersheds.

- Achieve a mix of ecological, social, and economic objectives.

2. Water and Riparian Areas

Three exclosures established in 2009.

General Goals	Specific Suggestions / Areas of Concern
• Improve channel morphology and riparian vegetation • Increase willows for bank stability and shading	• Measured approach to willow restoration to maintain accessibility of stream for fishing, especially for families • Develop comprehensive plan for willow restoration commensurate with site specific research including an evaluation of historic willow densities and distribution, current limiting factors, and social goals.

3. Water Use and Development

Of 1,280 acres acquired, about 700 acres can be influenced by irrigation water.

General Goals	Specific Suggestions / Areas of Concern
• Improve existing irrigation infrastructure to protect water rights, improve water management ability, increase forage production, and enable non-native fish removal • Develop water system outside of meadow to better distribute grazing across landscape	• Complete NEPA decision for West Selway Meadow irrigation diversion repair 2017. Begin implementing summer 2017.

4. Livestock Grazing

Two Grazing Allotments exist and livestock benefits from irrigation.

General Goals	Specific Suggestions / Areas of Concern
• Maintain grazing opportunities • Improve distribution of grazing and reduce impacts on riparian areas.	• Evaluate potential for off stream water developments to improve upland cattle distribution and forage utilization. • Complete NEPA decision for hardened crossing in Selway Meadow. Implement summer 2017.

5. Wildlife Resources

Include elk, deer, moose, black bear, antelope, wolves, Sandhill cranes.

General Goals	Specific Suggestions / Areas of Concern
• Promote habitat conditions that favor a range of wildlife species, including elk, mule deer, moose and other species. Migratory song birds	• Coordinate with MTFWP relative to existing habitat condition, habitat goals and desired conditions. When feasible, project design

	should consider treatments that favor desired habitat goals.
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6. Vegetation

5,300 acres of suitable timber. 4100 acres of suitable saw-log sized timber. 62% of suitable timber within ¼ miles of a road. 700 acres of saw-log sized timber within 150 feet of a road.

Desired Conditions/Goals	Specific Suggestions / Areas of Concern
- Improve forest resiliency by creating disruptions in homogeneous stands and promoting diversity in age classes and species where possible. - Restore forest diversity including aspen enhancement and selecting and managing for resilient Douglas-fir stands - Generate income through commercial timber harvest to support project implementation and local economies	- Remove encroaching conifers - Treat cheatgrass in Buffalo Creek area - Evaluate sage grouse habitat along East Side of project area and treat where needed - Treat conifer encroachment in Riparian areas - Maintain or enhance shrubby ceiquefoil (Potentilla) habitats - Maintain and improve Lemhi penstemon habitat - Maintain and improve pollinator habitat (?) - Create and maintain openings in forest to promote wildlife forage and cattle grazing - Enhance aspen and Douglas-fir component in forests - Due to mountain pine beetle (MPB) activity a significant portion of the lodgepole pine should be scheduled for harvest during the next 5 yrs to realize any economic value.

7. Invasive Species

General Goals	Specific Suggestions / Areas of Concern
- Early detection and rapid response to prevent new infestations - Careful annual management and mapping of existing noxious weeds to prevent spread and potentially eradicate small infestations - Use innovative treatment methods to include biotreatment, herbicide, manual	- Treat cheatgrass in Buffalo Creek area and other areas following inventory. - Funding set aside for weed work based on proceeds from other projects on the forest

8. Roads and Trails

39 miles of open motorized route, 17 miles open year-round, 1.8 miles open 12/1-10/14, 10.2 miles open 7/2 – 5/31, 4.6 miles within 150 feet of a stream, 33 stream crossings.

General Goals	Specific Suggestions / Areas of Concern
Retain an adequate road system to facilitate recreation and management.	Evaluate TAP recommendations and adjust with on the ground knowledge

• Maintain and improve roads and drainage features as needed to protect water quality and human safety • Ongoing road maintenance for this landscape • Decommission or store roads not needed for near term management activates. • Ensure road crossings accommodate aquatic organism passage • System promotes adequate management for wildlife. Ie: big game security specifically for elk security cover during hunting season and connectivity	• Maintain connectivity in the landscape for wildlife movement. • Consult with FWP on security, cover and road closures for sensitive wildlife times to facilitate responsible wildlife management and road use now and into the future
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9. Recreation

Allocations: 49% road-based, 97% winter motorized recreation, 21% summer non-motorized, 27% backcountry recreation

General Goals	Specific Suggestions / Areas of Concern
• Maintain fishing and hunting opportunities • Maintain summer and winter recreation opportunities, including snowmobiling	• USFS monitor recreation use to gain knowledge of current use to make decisions in the future • Anticipate increased use into the future

10. Aquatic Resources

Popularity as fishery is growing. Native cutthroat trout absent and western pearl shell mussel is of concern.

General Goals	Specific Suggestions / Areas of Concern
• Identify barriers to fish passage. • Restore a healthy population of native cutthroat trout. • Maintain viable population of pearlshell mussels. • Educate public on proper care of equipment	• Evaluate barriers on Selway, Browns, Buffalo, Fox, Governor, Blind Canyon, and Painter Creek • Work Closely with MFWP to ensure long term vision across the divide