Data Submitted (UTC 11): 7/31/2024 11:03:48 PM
First name: joe
Last name: cohenour
Organization:
Title:
Comments: To: Ranger Kathy Bushnell, H L&C National Forest July 31, 2024

From: Big Elk Divide Restoration Committee

Re: Larabee Hat Vegetation Project

The Big Elk Divide Restoration Committee (BEDRC) was formed in 2011 to develop projects that restore the landscapes to more naturally existing conditions, including addressing the impact that the mountain pine beetle and other resource changes may have on wildlife habitat and other resource values throughout the Big Belt, Elkhorn, and Divide Landscapes, hereafter called the Area.

The BEDRC has a collaborative approach whereby we identify restoration opportunities and specific project details to promote ecologically sustainable and resilient forests and habitats in the Area.

The BEDRC is a volunteer group of local citizens with a wide, diverse background and span of interest in how public lands projects are developed and accomplished. Each participant agrees to the Restoration Principles, to build upon a zone of agreement, and follow our code of conduct.

Please accept the following comments regarding the Larabee Hat (LH) Vegetation Project:

Although the BEDRC is limiting their comments to aspen and riparian communities, the BEDRC supports the LH Veg project as a whole.

The BEDRC believes developing a more defined plan for aspen and riparian communities will help the forest service make the LH area more fire resilient. By first building beaver dam analogs and then introducing beavers (Castor canadensis) to the area will help create natural fire breaks, especially if the FS clears the aspen and riparian areas of encroaching evergreens.

Current Situation
Aspen is in decline across the western United States, including in Montana. Modeling indicates that it now occupies only about 20% of its former area on the Beaverhead-Deerlodge National Forest (FP EIS page 14). There is probably a similar decline on the Helena-Lewis & Clark National Forest.

There are a number of reasons for the decline. Lack of disturbance (particularly by fire), herbivory by ungulates and overtopping by conifers are primary agents. However, drought, insects, disease, soil compaction and rodents acting alone and in concert with the leading causes, are also significant factors.
Desired Condition-Aspen
The desired condition is for sprouting to occur in such numbers (>1000/acre) that multi-layered stands will develop and have the capability to expand. The middle layers will have >500 stems/acre that are at least six feet in height and greater than an inch in diameter to have a chance of avoiding heavy browsing damage and be able to grow into larger stems. Conifer cover will be less than 25%.

Inventory

There are a number of different agents that might be affecting individual clones of aspen. A minimum of 20% of the identified clones should be inventoried to determine their current status and the specific factors that are affecting their health and vigor.

Vegetative regeneration of aspen can be initiated through manipulation of hormonal stimulation, proper growth environment and sucker production - the three elements of the aspen regeneration triangle. The correct course of action depends upon a careful evaluation of the size, vigor, age and successional status of the existing clone. (W.D. Shepperd RMRS-P-2001).

Landscape Treatments

We agree that landscape treatments are more likely to be successful in promoting aspen than individual stand treatments. This is because localized treatments offer highly desirable forage to wildlife and thus are likely to be heavily browsed.

However, we caution that landscape treatments aren't an assurance of success unless the land manager knows what the problems are. Research in Yellowstone National Park following the 1988 fires found that there was a significant response to suckering and some seedling became established. However, the number of the seedlings and many of the vegetatively established sprouts has declined significantly and height growth has been limited due to browsing.

Monitoring

Don't treat monitoring as an afterthought, or an optional activity. Monitoring should be implemented throughout the aspen restoration process. Consistent monitoring is essential. (from Guidelines for Aspen Restoration on the National Forests in Utah 2011)

They suggest several steps:

*Clearly state project objectives and post-implementation desired conditions.

*Monitor according to the schedule and methods for attaining quantifiable desired conditions established prior to the restoration implementation.

*Develop and test monitoring protocols.

1.Monitoring protocols should be systematically or randomly based for objectivity and repeatability.

2.Monitor adjacent control sites for each action.

3.Consider the need for a three-way exclosure and annually check exclosure fences for maintenance needs.

*Manage data so as to preserve and share the data

*Interpret monitoring data in reports that are shared.

*Consider altering monitoring methods or restoration methods based on monitoring results.

The Beaverhead-Deerlodge NF has developed an aspen monitoring process that we strongly recommend that you do a similar process so that results and effects can be compared and shared.

Road Treatments

The collaborative was happy to see that no permanent roads will be built and all new temporary roads will be obliterated at the end of the project. As stated in the wildlife portion of analysis, grizzly bears and roads are a lethal mixture and any effort to obliterate any old, unused roads outside of the system will be welcome.

Watershed Improvements and Grazing

The collaborative was enjoyed seeing a well thought out plan to commence watershed and riparian improvements, from simple willow planting to installing beaver analogs. We ask the forest to develop a plan to keep domestic cattle from "camping" in riparian areas and trampling banks and increasing erosion. We also ask the forest to keep wildlife in mind when signing agreements with grazing allotment users to limit the grazing to ½ the forage mass.

Thank you and good luck with the project,

/s/ joe cohenour /s/ Sam Gilbert

Co-chairs, Big Elk Divide Restoration Committee