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Date: October 18, 2001

**SCOPING STATEMENT  
REQUEST FOR PUBLIC COMMENTS**

**USDA FOREST SERVICE  
Shoshone National Forest  
North Zone/Wapiti Ranger District**

**Project Name:** Logan Mountain Fuel Reduction Project

**County:** Park County, Wyoming

**Legal Description:** T53N, R104W, Portions of Sections 22-27, 34, 35, and 36

**Proposed Decision Date:** Fall 2001

**Proposed Implementation Date:** 2002-2007

**Dear Interested Party:**

**Introduction-**The 2000 and 2001 wildfire seasons were severe across the western United States. Years of fire suppression and other management practices have resulted in an increased risk of high intensity fires that are difficult to control.

The Forest Service is obligated to provide fire protection on Forest Service managed lands. The challenge for fire managers is to efficiently and safely manage fire while maximizing resource benefits.

Under the goals and objectives of the National Fire Plan, the Shoshone National Forest has identified a hazardous fuel reduction project to lessen conditions that contribute to such large, uncontrollable wildfires.

Because of the fire risk involved, the Forest is considering a potential fuel treatment project using prescribed fire on the Wapiti Ranger District approximately 15 miles west of Cody, Wyoming. The proposed prescribed burn project is known as the Logan Mountain Fuel Reduction Project. To begin our analysis of the project, we have gathered data about the resource conditions and fuels in the area. We have described the desired conditions (goals) for the area. Based on preliminary information, we have developed what is called a "proposed action" which is designed to manage the resources so that they meet the desired conditions.

We feel we have an opportunity to protect private property, structures and improvements and other sensitive resources from serious loss or damage by carefully introducing prescribed fire under controlled conditions rather than waiting for unplanned ignitions under adverse conditions.



## Public Involvement-

We are in the initial stages of a planning and public involvement process for this potential prescribed burn project.

As a starting point, we are suggesting a “proposed action” in this scoping statement that represents an opportunity for the public to become involved and to help shape the project development and implementation. The proposed action is one alternative we could implement to meet the goals for the area. It may or may not be the final decision. This proposed action gives us a place to begin our analysis and allows the public to begin suggesting other ways we might achieve the goals.

By developing a “proposed action”, the public has a proposal to react to, which helps people focus on what concerns might exist and what comments to make to be most useful in further refining the project. We need to involve you and identify ways to modify the initial proposal, if needed, based on local residents knowledge of the area and possible concerns about how the project is implemented. This is why your comments and input are important.

The purpose of this letter is to **solicit written comments from all concerned parties to help us design and implement this project**. Your comments and suggestions are needed and encouraged. Project alternatives will be determined and environmental consequences analyzed during the National Environmental Policy Act (NEPA) process initiated by this scoping letter. Additional information, the purpose and need and the proposed action are described in the following sections.

High intensity wildfires are difficult to suppress, dangerous to firefighters and very costly to the taxpayers well as a threat to the increasing rural interface in the area. The prescribed fire treatments proposed would reduce the potential for costly and high intensity wildfires.

The inevitable alternative without management actions is an uncontrollable, high intensity wildfire burning in drought conditions during the heat of the summer. It is these high intensity wildfires that burn large acreages and entire watersheds, with the high potential for entire forest stand replacement, soil sterilization and erosion, loss of forage for livestock and wildlife, and impacts to scenery.

Therefore, it is felt that a low to moderate prescribed fire under very controlled conditions in spring or fall is more desirable than a wildfire ignition that occurs in August or September under the conditions described in the scenario above.

Over a three-to-five year period beginning in 2002, fire would be applied to treat 30% -60% of an approximately 2,470-acre project area. **NOTE:** Only a portion of the area would actually be burned. The proposal would mimic the historical fire pattern by creating a mosaic of burned and unburned vegetation. Fuels targeted to burn and create fuel breaks include sagebrush and junipers, down and dead litter accumulation and encroaching trees.

## BACKGROUND

Historically, recurring low to moderate intensity fires modified the species, age, density and size of vegetation patterns and the associated amount of accumulated fuels. Due to fire suppression, these natural processes have been drastically modified in most areas of the Rocky Mountain West, including the Shoshone National Forest.

Current fuel accumulations and fuel continuity have increased and are such that a wildfire start in the Logan Mountain area could develop into a large, uncontrollable wildfire that would threaten life and property on adjacent private lands and damage resource values.

The Forest Service has inventoried and collected field data during on-the-ground work during the summer of 2001. This analysis area of the project area indicated that existing fuel conditions were not leading toward attainment of the desired future conditions.

## **Safety-**

The Forest Service safely does prescribed burning on million of acres each year nationally. Locally, the Shoshone National Forest does approximately 4,000-acres annually and has the experience and demonstrated ability to conduct these burns safely.

Safety and implementation of prescribed burns are identified in a Burn Plan. Prescribed burning would be planned and implemented to take advantage of favorable fuel moisture, weather, air temperature, and relative humidity conditions conducive to producing low to moderate intensity fire. Additionally, atmospheric conditions would be monitored to determine conditions most favorable for smoke dispersion.

On all days of the prescribed burns, a spot weather forecast will be requested from the National Weather Service (NWS). The weather report received from the NWS is specific to the area being burned and forecasts the ground level wind speeds and direction, transport wind speeds and direction, smoke dispersal rating and mixing height of the smoke. If any of the parameters or constraints are not met, then the burn will be postponed to a day that meets all the required parameters.

## **PURPOSE AND NEED**

As previously mentioned, the Forest Service is obligated to provide fire protection on lands they manage. This section discusses the rationale and factors leading to the initiation of this effort.

The Logan Mountain Fuel Reduction Project is a preventive measure aimed at reducing the potentially severe effects of future wildfires, specifically the risk of a high intensity uncharacteristic wildfire in the project area. Prescribed burning would reduce wildfire hazards to the public and to fire fighters, along with reducing fire suppression costs.

The proposed action would not be implemented at once, but phased in over a three to five year timeframe. Prescribed fire would be used to treat smaller areas in a mosaic pattern of unburned and burned areas within a 2,740-acre project area (approximately four square miles). As proposed, 30-60% of the area may burn and the rest would remain unburned. This would result in 740-1,482 acres (approximately one to two square miles) that would actually be treated.

The implementation would involve a low to moderate intensity fire applied to the landscape through prescribed burning in the spring or fall. This would be done in strategic areas to reduce natural fuels accumulations that contribute to wildfire severity and intensity. In order to protect resources, life, and property, the project would address fuel continuity between national forest lands and private lands along the Forest boundary.

**EXISTING CONDITIONS (*where we are at now*)**-Decades of fire exclusion have changed the character of once open grasslands now being encroached with conifers and dense sagebrush providing fuel for wildfires. The frequency and function of disturbance by fire has changed dramatically due to aggressive fire suppression, leading to abnormally high concentrations of fuel.

The proposal does not involve merchantable timber or the suitable timber base. Firewood cutting of fuels in the area has limited utility because of the lack of public access and roads and the less desirable qualities of juniper and limber pine that are encroaching the burn units.

Field monitoring and assessments of fuel loading on the Shoshone National Forest have identified fire-adapted ecosystems that are in a condition that threatens their long-term resiliency, integrity, and sustainability. These assessments show that fire was an important disturbance that has been limited since the early 1900s due to aggressive fire suppression. These 90+ years of fire suppression has caused undesirable changes in the composition and structure (age and size) of forest and rangeland vegetation and contributed to excessive accumulations of fuels.

Over the past 40 years, the average size, intensity and severity of forest fires have increased; the 2000 and 2001 fire seasons have been particularly severe in Wyoming and the western states. Along with the increase in fire size and

intensity, the cost of fire suppression has increased. Other trends that show the need for fuel reduction projects are that more and more people are recreating on National Forests and building homes in wildland areas, increasing their exposure to wildland fires.

These alarming trends pose a greater threat to human life, including firefighters, and private property. As a consequence of these existing conditions and trends, Forest Plan management objectives for fuel conditions cannot be achieved. The existing conditions also make it more likely that a future fire disturbance would occur with a higher intensity and on a larger scale than would have occurred under natural conditions.

Based on the need for action described below, the purpose and goals of this project are:

#### **Project Goals-**

The primary purpose of the prescribed burning is to reduce the threat of wildfires to life, structures and property, and to improve the safety and capabilities for fire fighters in fire suppression activities.

- Implement proactive management to reduce fire risk and intensity on the Forest and neighboring private lands, structures, and in-holdings in a cooperative partnership with the public.
- Reduce the future suppression costs of fires
- Sustain or restore fire-influenced ecosystems, specifically grassland/shrub areas being encroached by conifers. Improve forage production and vegetation diversity (habitat)
- Lessen the threat to human life, property, and natural and cultural resources by reducing natural fuel accumulations

The project is needed to:

- Take a cooperative and proactive approach to reducing the wildfire danger both to private and to surrounding National Forest Service lands within wildland-rural interface areas.
- Based on Shoshone Forest Plan management direction (pages III-6 through III-10) and the current existing condition for the area, the following resource management needs have been identified for the Logan Mountain Fuel Reduction Project:
  - Reduce the accumulation of natural fuels
  - Provide cost effective fire protection to minimize the combined costs of protection and damages, and prevent loss of human life
  - Adopt visual quality objectives that will maintain or enhance the characteristic landscapes of the forest
  - Improve the health and vigor of vegetation types outside wilderness and selected types in wilderness where necessary

**DESIRED FUTURE CONDITIONS (*where we want to be*)** The potential burn units were identified as areas of high fuel and litter accumulations that exceed desired standards. This sets the stage for large, uncontrollable fires with an associated high level of damage to resource values. The proposed action, using prescribed fire under specific, controlled conditions, would treat these areas to move units from a high risk category to a lower risk category and/or maintain those areas that are already within desirable standards for fuel loads. Implementing the management actions would minimize the possibility of losing entire forest stands to a large, intense fire that may burn across the entire landscape with catastrophic results.

Prescribed fire is recommended as a preventative measure, so that fuel accumulations and fire risk can be reduced under controlled conditions (time of year, weather, humidity, and topography) in designated areas. In the spring or fall, low and moderate intensities prescribed fires are recommended that would remove down woody materials and other fuel accumulations that are building toward dangerous levels that contribute to high intensity wildfires.

The desired future conditions, or end result, of the prescribed burning would be a landscape more resilient to catastrophic fires with breaks in fuel types and a mosaic vegetation pattern of burned and unburned areas. The

reduction of volatile fuels such as junipers and sagebrush and returning areas to grasslands, slows the potential growth and intensity of fires and establishes defensible areas for firefighters. In summary, prescribed fire would:

- Set back vegetation succession to an early seral stage (a transitory stage in an ecologic succession), reducing conifer encroachment and sagebrush to convert or move toward grasslands in the project area.
- Maintain and enhance grass/shrub habitat where it is being changed by conifer succession to facilitate firefighting capabilities by reducing the amount and type of fuel.

## **THE PROPOSED ACTION**

Again, by developing a proposed action, the public has a proposal to react to, which helps people focus on what concerns might exist and what comments to make to be most useful in further refining the project.

### ***Who is proposing this project?***

The Logan Mountain Fuel Reduction Project is aimed at reducing the effects of future wildfires. The Shoshone National Forest would conduct prescribed burning in strategic areas to reduce wildfire severity and intensity in order to protect resources, life, and property. The project would address fuel continuity between national forest lands and private lands along the Forest boundary. Decades of fire exclusion have changed the character of once open grasslands now being encroached with conifers and dense sagebrush providing fuel for wildfires.

District office personnel are seeking public comments to help plan and carry out the project. The purpose of scoping is to identify issues and concerns related to the proposed action. In addition, scoping may identify additional information and management opportunities that may be incorporated into the proposed action as well as formulating alternatives to the proposed action. Input would be used to determine the nature and complexity of the proposed action, identify environmental and other issues to the proposed action and determine the level of NEPA analysis necessary.

### ***Why is the project being proposed?***

The rationale for the project is described in the previous Introduction, Background and Purpose and Need Sections.

### ***Where is the proposed project?***

The prescribed burn would be located in Park County and involves designated burn units or areas, north of Buffalo Bill Reservoir on Logan Mountain. The project is approximately 15 miles west of Cody, Wyoming. The enclosed maps show the location of the project proposal. Legal Description: T53N, R104W, portions of Sections 22-27, 34-36.

### ***When would the project occur?***

The proposed decision date would be the fall of 2001. Project implementation could begin as early as the spring of 2002, and would be conducted in spring or fall burning periods over the next three to five years. Burning would be scheduled to minimally impact other uses of the area.

### ***What is being proposed?***

An Interdisciplinary (ID) team of resource specialists would review and analyze the effects of the proposed action in relation to issues raised during the internal and public scoping process. The team will develop project design features for implementation of the project.

The proposed action would be designed to comply with Forest Plan Management Area Direction contained under management prescription 2A – semiprimitive motorized recreation and 3A – semiprimitive recreation in roaded and unroaded areas and the Forest-wide standards and guidelines for other resources as applicable.

Current fuel accumulations and fuel continuity are such that a wildfire start on National Forest Lands could develop into a large, uncontrollable wildfire that would threaten life and property on adjacent private lands. The proposal would mimic the historical fire pattern by creating a mosaic of burned and unburned vegetation. Fuels targeted to burn and create fuel breaks include sagebrush, down and dead litter accumulation and encroaching trees.

The burn units were identified as areas of high fuel and litter accumulations that exceed desired standards. This sets the stage for large, uncontrollable fires with an associated high level of damage to resource values. The proposed action, using prescribed fire under specific, controlled conditions, would treat these areas to move units from a high risk category to a lower risk category and/or maintain those areas that are already within desirable standards for fuel loads. Implementing the management actions would minimize the possibility of losing entire stands to a large, intense fire that may burn across the entire landscape with catastrophic results.

In addition, activities would focus on wildland-urban or rural interface areas to reduce risk to life and property. As described, the proposed project would result in fuel reduction treatment on only a portion of the approximately 2,000 acres of National Forest land within the project area.

- The specifics of the proposed action and project implementation include:
  - Acres and Fuel Types: The boundary of the project area contains 2,470 acres in one burn area, concentrating in areas of continuous fuels of sagebrush and limited, encroaching conifers adjacent to the forest boundary and private in-holdings. Only a portion of this area will actually be burned. Areas of continuous fuels of sagebrush and encroaching conifers adjacent to the forest boundary and private in-holdings are the primary focus areas for fuel reduction.
  - Air Quality: Air quality and smoke management would be addressed in project design. Federal and state standards would not be exceeded.
  - Fuels; Grazing Allotments/Range Improvements/Noxious Weeds: Rest/rotations would be coordinated with permittees; range improvements such as fences and water developments would be protected. A noxious weed evaluation would be conducted for the project prior to treatment.
  - Heritage (Cultural) Resources: A cultural resource survey would be completed on all proposed areas prior to implementation to protect any historical resources.
  - Ignition Type and Prescribed Burn Plan: A combination of aerial ignition with a helicopter and ground ignition systems by personnel with handheld torches would be utilized for safety and efficiency. All prescribed burning would be conducted under a Prescribed Burn Plan that would specify conditions under which the burn can safely occur. Area residents would be notified in advance of the implementation of the project to limit impacts to individuals with smoke sensitive conditions.
  - Recreation/Scenic values: No developed campgrounds or trails exist within the project area.
  - Roads/Soil and Water Protection: No roads would be constructed as part of the project. Areas identified on steep slopes with erosion or landslide potential would be excluded from burning or burned at a minimum intensity to limit bare soil exposure.

### **Possible Alternatives**

- No Action Alternative – Current management would continue and the proposed prescribed burns to reduce fuel loads would not be implemented.
- Alternative actions or area(s) would be analyzed if issues and concerns related to the proposed area are identified and could not be addressed through project planning or mitigated.

- Proposed Action - The project would be authorized as proposed.

#### **Potential Issues and Concerns-**

- How to reduce excessive fuel accumulations and continuous fuel concentrations that may contribute to a catastrophic fire?
- How to protect human health and safety, property and natural resource values in a cost effective manner?
- What is the best timing for the project to minimize potential conflicts with other activities?
- What is the potential effect on National Forest lands or other landowners?
- What is the potential effect on wildlife or other natural resource values?
- How will the Forest Service safely implement prescribed burning?
- Are there any extraordinary circumstances such as excessively steep slopes, wetlands, congressionally designated areas, Research Natural Areas, archaeological sites, etc. present that should receive careful consideration as part of planning?

*What else should the Forest Service consider as they review and analyze the effects of the proposed action and/or the alternatives? What comments, concerns, questions or additional information can you provide?*

#### **Nature of Decision**

The decision to be made is whether or not to authorize the prescribed burn as proposed, or an alternative to the proposal. Also, the decision could include what mitigation measures need to be applied to the proposal. Based on public comment from this scoping notice and environmental analysis, the Forest Service must determine whether significant issues or concerns exist. If there are any, they will be addressed in the analysis and the eventual decision.

#### **Contacts**

The public is provided this opportunity to identify and submit issues and concerns they feel the Forest Service should address. If you feel we have overlooked something or have additional information, comments need to be as specific as possible to assist us in the analysis. To be most helpful, comments should be submitted in writing no later than November 19, 2001.

For further information, contact project leader Clint Dawson, North Zone Fire Management Officer at (307) 527-6921.

Written comments can be mailed to: Attention-Marty Sharp, NEPA Coordinator, North Zone/Wapiti Ranger District, 203A Yellowstone Ave., Cody, WY 82414, e-mailed to [msharp@fs.fed.us](mailto:msharp@fs.fed.us), faxed to (307) 527-1202, or phone (307) 527-6921. If you choose to comment by e-mail, please include your name and regular mailing address.

Again, your comments are important to us.

Sincerely,

Clint Dawson (for)

BRENT L. LARSON  
District Ranger

**NOTE:** If you no longer want to be included on the NEPA mailing list to receive these scoping notices, please notify the office and help us keep the list current. Scoping Statements, the quarterly Schedule of Proposed Actions (SOPA) and other related NEPA documents are now being posted on the Internet at <http://www.fs.fed.us/r2/shoshone>. See “Forest Management”, then “Land Management Planning”, and then “Project Information” on the Shoshone National Forest home page.