# Fallen Bear Response to Comments Submitted During Public Scoping

*Comment 1-1:* The IDPR is concerned how timber harvest activities will affect these recreation facilities.

*Response:* This is addressed in Design Feature II. D 1 and in the Existing Condition section of Recreation Report.

*Comment 1-2:* White Pine pruning units will go over Trail #5 and Trail #86. The district should take the following mitigation measures to protect these trails.

- As a part of the planning process, consider designing trail corridors to protect the integrity of the trails.

  *Response:* Comment was addressed in Design Feature II D 3 and in discussion about Direct and Indirect Effects of Alternatives Band C of the Recreation Report

- Relocate the trails around the logging activity on either a temporary or a permanent basis.

  *Response:* This suggestion did not become part of the project because it was not part of the purpose and need for action in this area and it was not required to mitigate effects of the project.

- Provide recreationists on the trails with an alternate route around the sale during the logging activity.

  *Response:* This suggestion did not become part of the project because it was not part of the purpose and need for action in this area and it was not required to mitigate effects of the project.

- Require in the sale contract that logging slash be removed from the trail corridor

  *Response:* Comment was addressed in Design Feature II.D. 3

*Comment 1-3:* The most logical haul route for logging is the St. Joe River Road (Forest Hwy 50). From Avery to Bluff Creek, this road is part of the groomed snowmobile trail system. In order to avoid disrupting grooming activities, logging should not be permitted after December 15th.

*Response:* In previous years, local groups have liked FH 50 being plowed as it increases the areas that they can access. It is not a groomed trail beyond Bluff Creek, so this opens up several other open road systems for them to recreate on. Historically the end of plowing is around the first of the year. The likelihood of Gold Pass being plowed is pretty slim as there needs to be a considerable amount of logs (usually several sales) going over the top to justify plowing costs, especially with the down market.

*Comment 1-4:* The environmental analysis should take a look how public access (motorized and non-motorized) will be affected across the range of alternatives.

*Response:* This is addressed in the Recreation Report in the Environmental Consequences, Direct and Indirect Effects of Alternatives B and C of the Recreation Report section.

*Comment 1-5:* While most of the roads proposed for decommissioning or storage are spur roads, we would encourage the ID Team to take a closer look at providing loop opportunities for ATVs.

*Response:* This was not part of the purpose and need identified in the Fallen Bear Project Area. The St. Joe Ranger District is currently developing the travel management plan for the district. More information can be found at: http://www.fs.fed.us/ipnf/stjoe/travelplan/

*Comment 1-6:* Roads that are low risk and low value, if these roads have connecting trails, it could provide a trail opportunity

*Response:* This was not part of the purpose and need identified in the Fallen Bear Project Area. The St. Joe Ranger District is currently developing the travel management plan for the district. More information can be found at: http://www.fs.fed.us/ipnf/stjoe/travelplan/

*Comment 2-1:* The scoping notice does not indicate the size of the project area and does not indicate the estimated volume in MMBF that would be removed if the logging project were implemented.

*Response:* The number acres in the project area is identified in the introduction of the Fallen Bear EA. The estimated volume (CCF) removed if an action alternative is selected is identified in the Economics Report.

*Comment 2-2:* The Fallen Bear NEPA document needs to provide accurate scientific analysis, high quality information with expert agency comments regarding potential significant impacts, 40 CFR 1508.27, within and/or downstream of the project area if the planned timber sale is implemented.

*Response:* The information responding to this comment is located in the Fallen Bear Environmental Assessment and in the individual resource reports for the Fallen Bear Project located in the project file.

*Comment 2-3:* If an EIS will not be written, the EA is required to include the documentation that supports a finding of no significant impacts to; aquatics issues including sediment and temperature, fisheries and fisheries habitat, wildlife, or soils.

*Response*: The Environmental Consequences section of the EA provides general information supporting the finding of no significant impacts for each resource including a statement regarding Regulatory Consistency. The Environmental Consequence section of the each Resource report provides detailed documentation, which supports the finding of no

significant impacts to that resource. At the end of each Resource report is a section titled Compliance with Standards and Laws.

*Comment 2-4:* The range of alternatives need to meet the NEPA requirements at 40 CFR 1502.14.

*Response:* The Fallen Bear Environmental Assessment provides detailed description of three alternatives and information about alternatives considered but eliminated from detailed study.

*Comment 2-5:* Are the Douglas-fir found in the project area the same species as the coast Douglas-fir (*Pseudotsuga menziessi* (Mirb.) Franco var. *menziesii*)? If they are not, the NEPA document needs to indicate if the Douglas-fir in the project area are Pseudotsuga menziessi (Mirb.) Franco var. glauca. There needs to be accurate scientific analysis in the NEPA document that clearly identifies the specific Douglas-fir species found in the Fallen Bear project area.

*Response:* The Fallen Bear Forest Vegetation Report refers to Douglas fir, *Pseudotsuga menziesii (var. glauca)* as discussed on page 529 of Silvics of North America, Volume 1, Conifers. (Burns and Honkala 1990).

*Burns, R.M. and Honkala, B.H., 1990. Silvics of North America, Volume 1, Conifers. Agriculture Handbook 654. Washington D.C. USDA Forest Service. P527-540*

*Comment 2-6*: Each of the Forest Service scientific documents being used as part of the Douglas-fir analysis need to be included in the project files.

*Response:* All scientific documents cited in the analysis are provided in the Forest Vegetation Report bibliography

*Comment 2-7*: Are the Douglas-fir species located in the project area a moderately intolerant species that grows best with full overhead light? If they are not, the Douglas-fir analysis needs to provide accurate scientific analysis with high quality information that would confirm the Douglas-fir in the project area are not moderately intolerant and do not grow best with full overhead light.

*Response:* Douglas fir is intermediate in shade tolerance (Burns and Honkala 1990).

*Burns, R.M. and Honkala, B.H., 1990. Silvics of North America, Volume 1, Conifers. Agriculture Handbook 654. Washington D.C. USDA Forest Service. P527-540*

*Comment 2-8:* Concerning Douglas-fir and root diseases, the NEPA document needs to include expert agency comments regarding the current state of scientific research regarding logging and impacts to root diseases. The scientific documents relating to root diseases and fire issues should include the following USDA Forest Service RMRS report. *Root Diseases in Coniferous Forests of the Inland West: Potential Implications of Fuels Treatments,* Rippy, Rani C, et al, 2005, RMRS-GTR-141, Fort Collins, CO, 32 p. This publication is available at www.fs.fed.us/rm

*Response:* All scientific documents cited in the analysis are provided in the Forest Vegetation Report bibliography, including the Rippy et al publication.

*Comment 2-9:* The USDA Forest Service research papers that address uncertainty associated with root pathogens and Douglas-fir need to be included in the project files.

*Response:* All scientific documents cited in the analysis are provided in the Forest Vegetation Report bibliography and this includes references addressing root pathogens and Douglas fir ie. Rippy et al 2005, and Byler and Zimmer-Grove 1991.

*Comment 2-10*: Expert agency comments that summarize the scientific findings concerning uncertainty associated with root pathogens and Douglas-fir are required in the Fallen Bear NEPA document.

*Response:* The Fallen Bear EA recognizes the uncertainty associated with root pathogens and Douglas-fir on page 52 of the EA, "The proposed stand treatments have a potential to increase the current incidence of root and stem decays in susceptible species within the treatment areas. Increased representation of western larch and western white pine is expected to reduce the impacts of root and stem decays in the treated stands. Reduced impacts would be accomplished by reducing the presence of susceptible species, Douglas-fir and grand fir. "

*Comment 2-11:* The vegetation analysis also needs to provide high quality information that would indicate the number of acres of Douglas-fir that would be logged and indicate the maximum diameter of the Douglas-fir trees that would be logged if this project were implemented.

*Response:* Douglas fir is a major tree component in the Fallen Bear Project area. With its wide range of inhabitance, Douglas fir varies in all stages of a stand, from being a dominant species of the overstory to being in the understory as regeneration. Maximum diameters of trees that would be removed because of the implementation of the silvicultural prescription are dependent on the site-specific information included into the prescription.

*Comment 2-12:* The Fallen Bear NEPA document needs to address the opposing views NEPA requirement of 40 CFR 1502.9(b) and address the NEPA regulations cited in the WO Memo. Issues relating to responsible opposing views include logging and root diseases, and logging and impacts to wildlife habitat.

*Response:* The response to references provided by this letter and other letters, is in the project file, document #PI-6: *Literature Referenced in Public Comments to Fallen Bear Scoping*

*Comment 2-13:* Does any part of Element 4.5.2 *(EMS)* applies to this project?

*Response:* Element 4.5.2 will apply to the Fallen Bear project as part of our EMS procedure. Consistent with our commitment to environmental compliance, we have established and maintain a procedure for periodically evaluating our compliance with applicable legal and

other requirements. As outlined in the IPNF EMS Guide, compliance checks occur in three primary ways:

a. Pre-action compliance checks. Decisions regarding activities or services to be conducted on the ground (project-level decisions) are disclosed under NEPA. Compliances with legal and other requirements, including the LMP, are addressed, and the project activity or service is designed in accordance with these legal and other requirements.

b. Compliance checks are conducted during the activity implementation. Inspection reports, daily diaries, and other monitoring records are completed during this time. If non-compliances are identified, they are corrected as soon as possible within contract procedures or forest operations. Non-compliances and corrective actions are documented.

c. Post-action compliance evaluations. Compliance evaluations may be done as a part of field inspections of activities, activity reviews, a compilation and evaluation of compliance checks, land management plan monitoring, or other means.

*Comment 2-14:* Concerning Element 4.5.3, have any Corrective/Preventive Action Request (CAR) been filed by Forest Service personnel after June 1, 2006 relating to travel management or aquatics/fisheries issues in the project area and the cumulative effects analysis (CEA) area?

*Response:* There were three CAR forms for this area.

*Comment 2-15:* In the event that the CAR form was used by Forest Service personnel and submitted to the District Ranger, a copy of each CAR needs to be included in the project files. If no action has been taken in response to the submission of one or more CAR forms, what were the reasons why no action were taken.

*Response:* The forms and their disposition are included in the project file.

*Comment 2-16:* The project files need to include the Forest Service Fire Management Today Volume 61, No. 2 Spring 2001 publication

*Response:* The document is included in the project file, and project file document #PI-6: *Literature Referenced in Public Comments to Fallen Bear Scoping* describes how the document applies to the Fallen Bear project area.

*Comment 2-17:* The fire analysis in the NEPA document needs to indicate whether a lack of funding has prevented fuels reduction activities that removed the bushes, shrubs, plants and small trees that grew into the new openings that were created by the past timber sales.

*Response:* "Treatment" of regeneration in past timber sale areas is not prevented by a lack of funding. The positive fire-related effects to the landscape from timber harvest including fuels reduction, breakup of fuels continuity, and promotion of fire-tolerant species last far into the future. It has not been considered necessary nor beneficial in most cases to "remove the bushes, shrubs, plants and small trees that grew into the new openings".

*Comment 2-18:* The scientific papers that examine the long-term fuel loading issues associated with the growth of brush, shrubs, plants and small trees in new openings need to be included in the project files.

*Response:* Scientific papers that examine the efficacy and longevity of state-of-the-art fuels treatments are included in the project files. See references in the Fallen Bear Fire and Fuels Report.

*Comment 2-19:* If no monitoring data has been acquired regarding the current fuel loadings that exist in the logging units within and adjacent to the project area, what methods are being used to calculate the current fuel loadings in the logging units?

*Response:* This information is found in the Affected Environment section of the Fire and Fuels Report: Appropriate Photo Series for area, Stand exam data.

*Comment 2-20:* What is the yearly budget that would be necessary to conduct yearly fuel loading monitoring if this project is implemented and over 480 acres are logged?

*Response:* This information is not necessary for analyzing the effects of the proposed actions. Yearly fuel loading monitoring is unnecessary given the growth dynamics of this area.

*Comment 2-21:* The fire analysis needs to indicate whether FFE-FVS is being used for any part of the fire analysis. If FFE-FVS is being used, the limitations of the model as it applies to the Fallen Bear project need to be described in the NEPA document.

*Response:* See Analysis Methods in the Fire and Fuels Report. It includes a description of the FFE-FVS model and how it is used for this project.

*Comment 2-22:* The aquatics analysis needs to indicate whether there are any EPA approved sediment and/or temperature TMDLs that include the project area or the CEA area.

*Response:* Information is provided in the Water Resources Report, Existing condition, Total maximum Daily Loads (TMDLs) portion of this document.

*Comment 2-23:* If there are one or more sediment or temperature TMDLs, the aquatics analysis needs to describe the TMDL requirements that apply to the Forest Service.

*Response:* Information is provided in the Water Resources Report, Existing condition, Total maximum Daily Loads (TMDLs) portion of this document.

*Comment 2-24:* The aquatics analysis needs to describe the current status of any TMDL Implementation Plan that applies to the National Forest System lands that are included in the areas covered by the TMDL(s).

*Response:* Information is provided in the Water Resources Report, Existing condition, Total maximum Daily Loads (TMDLs) portion of this document.

*Comment 2-25:* The Idaho Water Quality Standards and Clear Water Act regulations that apply to the water bodies located within and downstream of the project area need to be described and listed in the aquatics section of the NEPA document

*Response:* Information is provided in the Water Resources Report, Existing condition, watersheds portion of this document.

*Comment 2-26:* The fisheries analysis needs to describe the MIS species located within and downstream of the project area and indicate whether there are any streams or Creeks within or downstream of the project area that are classified as Not Properly Functioning.

*Response:* The Fisheries report identifies the MIS species for this project and in which streams they are located. The report also identifies the current condition of the streams of the project area.

*Comment 2-27:* If there are any fish passage barriers located within the project area, the fisheries analysis needs to provide high quality information that indicates the location of each fish barrier and indicate the number of years the fish passage barriers have been located in the streams or Creeks.

*Response:* Information regarding fish passage barriers is located in the existing condition portion of the Fisheries Report.

*Comment 2-28:* The aquatics analysis needs to include high quality information that indicates the current ECA for the project area, the CEA area, and describe the model that is being used to calculate ECA. The ECA discussions should also indicate whether the model being used meets the requirements for best available science.

*Response:* The Water Resources Report section titled Assumptions and Limitations of Analysis Methods, WATSED model includes this information. A description of CEA area is in the Water Resources Report section titled Analysis Area.

*Comment 2-29:* The cumulative effects analysis needs to describe the past Forest Service logging and road construction/road reconstruction that has occurred in the project area.

*Response:* The Management Activity Report lists all management activities (including logging and road construction), which have occurred in the project area in the past. Individual resource reports describe which of those activities affected the resource and if the resource continues to be affected by the activity.

*Comment 2-30:* The EAs that were produced for the previous timber sales need to be included in the project files. If one or more EAs associated with previous FS timber sales are missing, the cumulative effects analysis needs to describe the missing NEPA documents.

*Response:* Effects from past activities are taken into consideration for existing conditions and cumulative effects. See the EA for summaries of cumulative effects analysis and the Management Activity Report. A list of previous EAs for projects in the project area will be included in the project file. Individual EAs are located in the district files.

*Comment 2-31:* The cumulative effects analysis also needs to describe the expected cumulative impact on the environment, 40 CFR 1508.7, if the planned logging and road construction and road reconstruction activities are implemented.

*Response:* The Fallen Bear Environmental Assessment identifies cumulative effects for each resource. Each individual resource report also describes cumulative effects for each alternative.

*Comment 2-32:* The cumulative effects analysis also needs to describe the direct and indirect effects, 40 CFR 1508.8(a) & 1508.8(b), to the environment if the proposed logging and road construction and road reconstruction activities are implemented.

*Response:* The Fallen Bear EA provides general descriptions of the direct and indirect effects for each resource. Individual Resource reports provide detailed descriptions of the direct and indirect effects expected from the implementation of an alternative.

*Comment 2-33:* The NEPA documents needs to include high quality information that will indicate the number of proposed logging units that are associated with 3.7 miles of new road construction.

*Response:* Information is provided in the Transportation Report under the section titled System Road Construction.

*Comment 2-34:* High quality information is also needed that will indicate the estimated volume of sawtimber that would be removed from the logging units that are associated with the proposed new road construction.

*Response:* See Transportation Report pp. 5-6.

*Comment 2-35:* the following USDA Forest Service Pacific Northwest Research Station document should be used as part of the roads analysis for this project. *Roads in Landscape Modeling: A Case Study of a Road Data Layer and Use in the Interior Northwest Landscape Analysis System*, Marti Aitken and Jane L. Hayes, September 2006, Pacific Northwest Research Station Research Note PNW-RN-552, 26 p. This paper is available from the Pacific Northwest Research Station at http://www.fs.fed.us/pnw

*Response:* This document was reviewed and is included in the project file. It covers the use of roads in a landscape-level analysis. The Fallen Bear analysis is a project level analysis proposing a net reduction in the miles of road in the project area. The document identified

many limitations in existing databases, limitations which would apply to the Fallen Bear project area and make this analysis method unusable at this time.

*Comment 2-36:* The roads analysis portion of the NEPA document needs to include a list of the current USDA Forest Service research papers that examine environmental impacts to aquatics, soils, vegetation, and wildlife as a result of new road construction on NFS lands.

*Response:* The Transportation Report lists the documents referenced for that analysis. Additional references related to impacts of roads on the environment were utilized for the Soils Report, Fisheries Report, Water Report, and Wildlife Report.

*Comment 2-37:* The NEPA documents need to provide expert agency comments that will indicate whether the IPNF released to the public in 2005, 2006, or 2007 the yearly IPNF Forest Plan Monitoring and Evaluation Report as required by NFMA at 36 CFR Part 219. If any Reports were released to the public, a copy of the Report(s) need to be included as part of the official record.

*Response:* The IPNF released a combined Forest Plan Monitoring and Evaluation Report for 2005 and 2006. This document is included in the Fallen Bear references and its available on the web http://www.fs.fed.us/ipnf/eco/manage/monitoring/fp2005-2006monrpt.pdf

*Comment 2-38:* The monitoring discussions in the NEPA document needs to include expert agency comments that will indicate whether any required Forest Plan aquatics, wildlife, or soils monitoring associated with completed timber sales after 1987 in the project area was not performed due to lack of funds.

*Response:* The Fallen Bear project is a proposed implementation project, it does not have authority to direct how Forest Service funding is utilized. This comment, therefore, is out of the scope of this project.

*Comment 2-39:* The Monitoring discussions also need to include high quality information that describes the estimated amount of funds that would be required to perform all required IPNF Monitoring and Evaluations, and required Federal and State monitoring if the timber project is implemented and 3.7 miles of new roads are constructed.

*Response:* The Fallen Bear Environmental Assessment analyzes potential impacts to the environment from the proposed implementation alternatives. Monitoring that is required to implement this project will be accomplished.

*Comment 2-40:* The aquatics, wildlife, and soils Monitoring documents that were produced as required by the Forest Plan for timber sales in the project area need to be included as part of the project file.

*Response:* Forest Plan monitoring that is required for aquatics, wildlife and soils resources are located in the IPNF Forest Plan Monitoring and Evaluation Reports. These reports are included in the Fallen Bear project file.

*Comment 2-41:* The USDA Forest Service biomass research papers that describe the benefits and disadvantages of producing biomass need to be included as part of the official record.

*Response:* As described in the Fallen Bear EA, biomass removal would be a by-product of the proposed fuel treatments. It would not involve any additional or special treatment. Piled material may be utilized for fuel projects.

*Comment 2-42:* Expert agency comments are needed regarding the economic issues that are associated with biomass that would be produced if this project were implemented.

*Response:* As described in the Fallen Bear EA, biomass removal would be a by-product of the proposed fuel treatments. It would not involve any additional or special treatment. Piled material may be utilized for fuel projects.

*Comment 2-43:* All old growth surveys conducted in the project area need to be included as part of the official record. The names and area of expertise of each individual who performed the old growth surveys in OGMU need to be included as part of the official record. The stand records of the old growth stands in OGMU 27 that apply to this project need to be included in the project files

*Response:* All information collected and used in the old growth analysis is available in the project file.

*Comment 3-1:* Please send us a copy of the "EAWS for the Fallen Bear Area" your letter mentions, along with a copy of the results of the Quartz Gold Analysis Area RAPs

*Response:* An email was sent to Jeff Juel on 6/9/08 discussing his request and asking for clarification, no response was received back from him. The information being requested is located in the project file.

*Comment 3-2:* What is the difference between the 118 acres, and the rest of the 355 acres *in relation to OG?*

*Response:* Other stands, totaling 355 acres, were allocated for old growth management during the process used to develop the proposed action. Of those acres (355 acres), 118 acres were allocated for old growth management **and** they meet the intent of maintaining long-lived, early-seral species, specifically western larch and white pine.

*Comment 3-3:* Also, the letter says that OGMU 27 has "28% …allocated for old growth management." How many acres of that total have been determined to actually meet the criteria for effective old growth?

*Response:* In OGMU 27, approximately 27% of the area is allocated old growth that has been evaluated as effective old growth based on the information provided in the old growth analysis.

*Comment 3-4:* Why would the Forest Service consider allowing motorized use on Road Management Prescription C roads, given that the road would be left in a condition that would not require any maintenance?

*Response:* The definition of a road management prescription C calls for removal of culverts and recontouring of the first 300 feet of the road. This physical treatment of the road would prohibit full-size motorized use of the road. Generally, the access management strategy is to eliminate or prohibit all motorized use while the road is in storage. Travel management decisions were not part of the purpose and need for this project. Those decisions will be made during the St. Joe Ranger District's travel management planning process which is expected to be completed in 2009.

*Comment 3-5:* However we don't believe that construction of 3.7 miles of new road is warranted. The notion that the Forest Service cannot manage the area adequately with the present road system doesn't make sense, given the already excessive road density.

*Response:* After considering this comment and conducting additional field reviews some of the proposed road construction was eliminated, so the proposed action (Alternative B) described in the EA includes one mile less road construction. Alternative C was developed to address concerns about impacts from roads, so it has even less new construction and reconstruction. There will be a reduction in the number of system roads if either action alternative is selected.

*Comment 3-6:* We ask the Forest Service strongly consider restoration activities that would improve conditions for other ecological conditions damaged by past actions, such as soil compaction and erosion off of roads.
We suggest the following definition of **sustainability,** adopted last year by the Montana Forest Restoration Committee in creating their Montana Forest Restoration Principles.**:**

> The ability of any enduring social or natural system to continue functioning into the indefinite future without being forced into decline through exhaustion of key resources. In a sustainable system, the demands placed upon the environment by people and commerce can be met without reducing the capacity of the environment for future generations. Essentially, it is recognized that economic security, community vitality, equity, quality of life, and commitment to the welfare of future generations depends upon maintaining and restoring ecological integrity.

(See: http://www.montanarestoration.org/restoration/principles )

*Response:* This comment is addressed by the purpose and needs for the project to "Reduce management related erosion and sedimentation - Aquatic resources would benefit from a reduction in human-caused sediment."

*Comment 3-7:* We ask that you consider other important components as you define "desired conditions" or "natural conditions" for the Fallen Bear project area. These include amount of interior mature and old-growth forest, amount and size distribution of snags, amounts and distribution of coarse woody debris, and soil conditions and land productivity

*Response:* This comment is addressed in the Fallen Bear EA by the identified issues; "Effects of Timber Harvest and Road construction on Wildlife Habitat" and Effects of Timber Harvest and Road Construction on Stands that meet minimum criteria for Old Growth". Design Feature II.B.6 addresses amounts and distribution of coarse woody debris and the Soils report addresses soil conditions and productivity. Design Feature II.G.7 addresses size and distribution of snags. The Fallen Bear Wildlife Report and the Old Growth Report address mature and old growth forests and the amount and distribution of snags.

*Comment 3-8:* In other words, in the case where those components are not within the natural range of conditions, we ask that any project proposal prioritize restoration of those components, and at the very least does not push those conditions further outside the range of natural conditions.

*Response:* The purpose of the project is to improve resilience of the area to disturbances. We did consider the natural range of conditions when we developed the proposed action (see the Botany Report (Botanical BA & BE), the Forest Vegetation Report, the Noxious Weed Report, the Fisheries Resource Report, the Soils Report, and the Water Resources Report)

*Comment 3-9:* We ask that you include analysis of wildland fire use so that can be a part of any decision.

*Response:* The Fallen Bear EA identifies, in the section titled Forest Plan Direction, the Management Areas (MAs) which occur within the project area. The IPNF Forest Plan does not allow for wildland fire use within the MAs found in the Fallen Bear area.

*Comment 4-1:* We recommend appropriate measures are taken to define and protect the several SMZ buffers (INFISH requirements) for the units adjacent to streams

*Response:* Within the Fallen Bear EA, Design Feature II. A.1. identifies buffer widths, which would be used if an action alternative is selected.

*Comment 5-1:* We are concerned with the new road construction, extensive logging, and potential for logging of old growth.

*Response:* The Fallen Bear EA and associated resource reports describes the environmental impacts that can be expected if the alternatives described were implemented.

*Comment 5-2:* We encourage you to evaluate an alternative based entirely off existing roads, one that applies free selection and/or prescriptions that retain more canopy, one that applies more Rx fire to the project area.

*Response:* This comment is addressed in the Fallen Bear EA in the section titled Alternatives Eliminated from Detailed Study. The Vegetation Project File includes a document titled Fallen Bear Diagnosis Matrix for the Proposed Action, which considers other harvest prescriptions. The use of more fire prescriptions in the project area would not meet the purpose and need for action in this area as identified in the Fallen Bear EA.