

## APPENDIX B

### Response to Public Comments Received on the Environmental Assessment

#### *List of Organizations and Individuals from Whom Comments Were Received*

Downes, Jack (1)	Daly, Carol – Flathead Economic Policy Center (9)
Kellenbeck, Frank – Telephone (2)	Colman, Tom (10)
Burt, David (3)	Jarecki, Chuck – Recreational Aviation Foundation (11)
Kellenbeck, Frank – Letter (4)	Cartwright, Chas – Glacier National Park (12)
Borkoski, Michael (5)	
Byrd, Gerard & Loretta (6)	
Lawson, Ken & Mary (7)	
Yates, Rick (8)	

#### *Comments*

##### Access

1. I have an existing road to the tip of the hill on my land and would be willing to discuss with the successful logger access to area #20. I believe the top ½ of #20 could be harvested and logs hauled with less total soil disturbance. (2, 4)

**FS Response:** Thank you for your offer, this information has been passed on to our presale forester.

2. Logging would leave access routes that all terrain vehicles (ATVs) could end up using. (5)

**FS Response:** Skid trails and temporary roads within treatment units would be closed in a manner that discourages future off-road motorized use (e.g. slash and down-woody material scattered on trail surfaces, or recontouring if needed). Adequate signing and barriers would be a part of this effort. Any reports of illegal off-highway vehicle use within the project area would be investigated by Forest Service law enforcement personnel and appropriate action taken to prevent such use.

3. Landowner wanted to know if a neighbor has legal access across his property, can that neighbor give the Forest Service permission to go across the landowners property. (8)

**FS Response:** If a private landowner does not want to grant the Forest Service access across their land, we will look for another way to access that unit – if there is no other way to access the unit, the unit would not be treated.

### Fire/Fuels

4. I am not so sure about the controlled burn method of thinning the forest. I am not opposed to it – I think that it can be done safely, if everything goes right. (3)

**FS Response:** Prescribed burning to reduce fuels and improve wildlife habitat would be located to take advantage of natural barriers to prevent undesired fire spread; barriers would include rocky areas near ridgetops and north aspects less prone to burning. Implementation strategies and desired weather conditions for prescribed burning would be described in a site-specific burn plan. This plan would include an analysis of risks, would identify mitigation methods to avoid escaped fires, and would include contingency actions to be taken should an escape occur. While there would always be some risk of escaped fire, strict adherence to the burn plan would ensure this risk remains low.

5. This project will complement both the agency’s previous wildland urban interface (WUI) fuels reduction work on National Forest System (NFS) lands and the work done on private lands through cost-share projects administered by our organization and the Northwest Regional RC&D. (9)

**FS Response:** Prompted by the Health Forests Restoration Act (2003), the Hungry Horse/Glacier View Ranger Districts have implemented several projects to reduce wildland fires in the WUI. These projects, in addition to fuel reduction work done on private land, are intended to reduce the risk of wildfire in the WUI to protect the resources, natural and man-made, that occur there.

6. We noted that impacts to visitors were not analyzed. If prescribed burning occurred in the summer in the areas noted on the map as A and B, visitors could be affected by smoke and noise from the operation. We would prefer to see this area burned in the fall or early spring, prior to the summer visitor season. (12)

**FS Response:** The EA documented impacts of the project to air quality, visuals, and recreational activities, which are potential effects to visitors. Specifically, the air quality analysis addresses smoke emissions from the proposed burning operations. Based on previous burning projects, it is more likely burning would occur during the fall due to more favorable smoke dispersal and better fuel moisture conditions. All burning would comply with the Smoke Management Plan prepared by the Montana Air Quality Bureau and administered by the Montana State Airshed Group. Burning would likely be ignited by helicopters due to the steep slopes in the area and is expected to take only 1 to 2 days to complete.

### Miscellaneous

7. Several letters indicated the author(s) were strongly in favor of the project, and many would like to see more fuels reduction take place. (1, 2, 3, 4, 5, 7, 9, 11, 12)

**FS Response:** Thank you for your comments and support of this project. Identification of treatment areas considered stand conditions and location relative to private property, as well as other resource values, such as retention of wildlife travel corridors and habitat.

8. He lives adjacent to Unit 17 and is opposed to treatment in this unit. He doesn't think the government should be protecting his property. (5, 8)

**FS Response:** We appreciate your feedback regarding this unit, but we also considered other adjacent and nearby landowners who have expressed support for this unit. Fuel reduction treatment areas do not only benefit adjacent landowners, they can also benefit nearby landowners, residents, business owners, etc, by lowering potential hazardous fire conditions in the general area. This is dependant upon the placement of units on the landscape, and other factors such as forest stand condition, climate, etc.

9. The area near his property was logged in 1989, has been slow to recover, and is not a pleasant looking area. (5)

**FS Response:** Design Criteria have been developed specifically for this project to protect soils, riparian areas, air quality, recreation and scenic values, and wildlife, and to reduce the potential for noxious weed spread. Implementation methods, and duration and season of activity restrictions, have been specified to provide further protection to resources in the project area.

10. The landowner was more in favor of winter logging (Units 14 and 15) because it would be less impactive to his living situation. (10)

**FS Response:** There are no resource concerns in Units 14 & 15 that would require winter logging, so fuel reduction activities could occur in the summer or winter months. It is possible that Units 14 and 15 could be winter treated; this request will be passed on to the decision maker.

### **Noxious Weeds**

11. Noxious weed spread is very important to keep in check. It is my hope that these treatment areas will be watched for some time and aggressive measure taken, including herbicides if needed, to keep invasive plant species spread to a minimum. (4)

**FS Response:** Specific design criteria are included in this project to prevent the spread of noxious weeds. These criteria include the washing of equipment prior to entry into the treatment units, the seeding of disturbed areas with weed-free ground cover as soon as possible, and the saving and replacement of topsoil on temporary roads after use. In addition prior to project implementation, most haul routes would be treated for weeds and some units would be spot-treated for localized weed populations prior to implementation. Annual surveys would be conducted for three years following the start of sale activities to identify any invasion of noxious weeds. Should weeds be discovered, treatment would be consistent with the strategy outlined in the Flathead National Forest Noxious and Invasive Weed

Control Decision Notice (May 2001). While these efforts would not eliminate the potential for new weed populations, it would reduce that potential.

12. Concerning weed control, some of the Forest Service roads that would be used for access have infestations next to the road of species like spotted knapweed. I suggest that the roadways be sprayed before the commencement of the project. We would be willing to partner with the Forest Service to spray Road #10325 with Tordon. I have a private applicators permit and can do the spraying under the guidance of the FS weed control officer. (11)

**FS Response:** Please see response to #11. Thank you for your offer to assist us with spraying weeds, your offer will be passed along to the weed control person.

13. On page 15 you noted weed treatments would depend on sufficient availability of funds from implementing the contract. We encourage you to reconsider this. If you are conducting a project that has the potential to result in more weeds, then funding needs to be assured for weed treatment. (12)

**FS Response:** It goes on to say, on page 15, that if there are insufficient funds available from this contract, treatments would compete for funding with other Forest-wide stewardship resource conservation projects, or would be prioritized with other Forest weed sites-of-concern using the Forest annual weed budget. It is our intention to treat this area to prevent the spread of noxious weeds.

### **Wild and Scenic River**

14. He is concerned about Wild and Scenic River impacts and does not see the need for treatment. (8)

**FS Response:** Specific concerns relative to the Wild and Scenic River corridor (Middle Fork Flathead River) were not identified in the comment. There are two units (Unit 16 and 27) which fall within the corridor which is identified as management area (MA) 18 in the Forest Plan. One of the goals of MA 18 is to maintain the scenic, ecological, and recreation integrity of the resource through responsible management. Vegetation removal is allowed within this portion of the Wild and Scenic river corridor as long as it is designed to protect the values for which the river was classified.

An analysis was completed which assessed effects from these two units on wild and scenic river values and concluded these values would be maintained. Unit 27 and 16 are not visible from the river, so there would be no effect to the visuals or recreation experience of river users. The assessment of effects on fisheries, wildlife including threatened, endangered, and sensitive species, and water quality found little to no effects on these resources which help influence the ecological integrity of the corridor.

### **Silviculture**

15. How will the slash in Unit 20 be treated? I would prefer it to be chipped. (2)

**FS Response:** In areas where visual effects are of concern, slash and woody debris removal methods would minimize visual impacts. Additional efforts would be made to dispose of any slash piles clearly visible from homes. If unsightly pile remnants remain following treatment, further efforts would be made to dispose of this material. These efforts could include re-piling and burning, chipping, shredding, or hauling the material away. Your preference for chipping will be passed to the decision maker.

16. I do not want so many trees taken that the remaining trees blow down in a strong wind. I hope you are clever enough to leave enough trees that they will protect each other. (3)

**FS Response:** Windthrow risk is evaluated in the EA, and it is acknowledged that opening up the stand canopy in dense forests may increase the risk of windthrow, especially where mature lodgepole pine occurs. Western larch and Douglas-fir tend to be less susceptible to windthrow, but given strong enough winds, all species are vulnerable. This is one of the inevitable potential effects of treatments that adequately reduce risk of high intensity crown fires in forest stands – the forest canopy must be opened up to effectively achieve this objective. Leaving the trees in small groups can perhaps provide some protection from windthrow, but the risk is still higher than in an uncut forest. Partly because of this increased windthrow risk (resulting loss of trees, buildup of ground fuels, and visual impacts that may result), many of the mature lodgepole pine stand treatments in the Belton Project would remove the majority of the trees, leaving relatively few overstory trees, and regenerating (by natural seed or by planting) to a new stand of sapling trees. It is expected that the overstory trees will eventually blow down, but they are too few to cause any concerns with ground fuel loading.

17. He is concerned about snag retention; specifically worried that contractors will take snags for firewood. (8)

**FS Response:** Large diameter larch and Douglas-fir snags (>18” dbh) would not be removed from the treatment areas. These are recognized to be of high value to wildlife and are the longest lasting on the landscape. Contract provisions would require that these large snags remain intact unless they need to be felled for safety reasons. If they are felled, the contractor is required to leave them on site. The contract administrator would be responsible for making sure that the contractors implement the contract appropriately.

18. The landowner is concerned about the two units he lives next to, specifically noise and aesthetics. Removing trees in these two units would reduce the sound buffer the trees provide, and he has concerns with how open the units may become. (10)

**FS Response:** The presale forester and silviculturist have indicated that they have spoken with you about this issue, and have explained the treatment applied in these units. Leave tree density varies as you move further from the private boundary, mainly to help ameliorate for some of the visual effects that concern you. The unit is relatively narrow, about 300 feet at its widest, which leaves at a minimum twice that distance of unharvested forest between the unit and the highway. We have tried to be clear that Unit

14 in particular will look quite open upon completion of harvest, in order to accomplish our objective of fuel reduction and regeneration of this dense, small diameter lodgepole pine stand (see response to comment #16). Natural regeneration and planting of seedlings will occur to establish a new stand, and adequate sunlight is needed for seedlings to establish and grow well.

### **Soils**

19. He feels the treatments would do more harm than good, as there are poor soils in the area and he is concerned about erosion. (5)

**FS Response:** Design features were developed specific to soils and the proposed activities to reduce the risk of detrimental soil disturbance. The soil specialist's report states that the gentle slopes in the project are not a high risk for erosion and that these design features will further reduce the risk of erosion. The soils design features can be found in the EA, page 12.

### **Wildlife**

20. Removing vegetation could affect ungulate use of this area. (5)

**FS Response:** It is true that vegetation removal may affect ungulate use of the area; however, because there is a significant amount of forest cover in the Belton Project area, it is not believed that ungulate use would be adversely affected. In general, ungulates respond favorably to forest openings, especially when there is forest cover nearby. The more open forested conditions resulting from project treatments would potentially increase ungulate forage production due to increased sunlight reaching the forest floor. In addition, the proposed prescribed burning is expected to increase the quality and quantity of winter/spring forage production in treated areas. Ungulate use is expected to continue in the project area in general, and may increase in the project treatment sites (post-treatment).