

**APPENDIX C - OBJECTIONS**

***Objections and Response or NEPA Documentation Reference on Objections Received on the Holland Pierce Fuels Reduction & Forest Health Project***

<b>OBJECTOR: THE ECOLOGY CENTER &amp; ALLIANCE FOR THE WILD ROCKIES</b>		
<b>ISSUE</b>	<b>SUGGESTED REMEDY</b>	<b>RESPONSE / NEPA DOCUMENTATION REFERENCE</b>
1. Public comments will be dismissed without adequate thoughtful consideration and responses.	None	<ul style="list-style-type: none"> <li>▪ The public process for this project is consistent with NEPA requirements (EA, page 7).</li> <li>▪ Comments received on this project, including those submitted by the objector, were considered by the ID Team during the design and analysis phases of this project (EA, Appendix C).</li> <li>▪ Based on public comments received on this project, the ID Team developed three alternatives to the proposed action. For reasons provided in the EA on pages 10 and 11, these alternatives were not considered in detail.</li> </ul>
2. The EA fails to clearly disclose which treatment units are for fuel reduction and which are to deal with the alleged "forest health" problem(s).	None	<ul style="list-style-type: none"> <li>▪ The purpose and need for this project includes both the reduction of hazardous fuels and the improvement of forest health.</li> <li>▪ As disclosed in the EA (page 33 and Appendix B, page B-6), forest health would be improved in all of the proposed fuel reduction treatment units.</li> </ul>
3. The EA fails to deal with the hazardous fuels and forest health issues on the appropriate landscape scale.	Provide a discussion of the conditions in the larger landscape surrounding the treatment units. (Inferred)	<ul style="list-style-type: none"> <li>▪ The focus of the proposed action is to reduce fuels on NFS lands which are adjacent to private lands (wildland/urban interface areas (EA, Appendix B, pages B-6 to B-8). The proposed actions are consistent with fuel reduction treatments recommended in the Seeley-Swan Community Fire Plan.</li> <li>▪ The analysis (affected) area for fuels management and forest vegetation is the project area (EA,</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
		page 17), which includes approximately 34,500 acres (Project File, Exhibits G10 and G-12).
4. The EA also fails to deal with the fuels issue on the appropriate temporal scale.	None	<ul style="list-style-type: none"> <li>▪ The temporal scale for the fuels analysis is 10 to 15 years, after which time that the post-treatment 'moderate fire hazard' conditions would progressively diminish to where subsequent fuel treatment would be needed (Project File ExhibitG-10).</li> <li>▪ This issue surfaced during the scoping phase of this project (EA, Appendix C, page C-20, Issue #13).</li> <li>▪ The temporal scale for the forest vegetation analysis is 15 to 20 years, the time that forest succession would have advanced sufficiently to create a forest vegetation conditions similar to the pre-treatment condition.</li> </ul>
5. Both the project-level and programmatic ecological and economic costs and impacts go unexplained and undisclosed.	The Flathead NF must disclose to the public just how much of the Forest is considered to be likewise "out of whack" in alleged "forest health" terms and more importantly, disclose how much of the Forest is to be treated for fuel reduction in a manner that emphasizes fuel conditions over native ecological processes.	<ul style="list-style-type: none"> <li>▪ The EA discloses the potential ecological impacts associated with the implementation of the proposed action (EA pages 15 to 44 and Project File, Section G – Specialist's Reports). The EA includes a social and economic analysis (EA, pages 42 to 43, Project File Exhibit G-23).</li> <li>▪ The future condition of the fuel treatment areas is discussed in the EA on page 39 and 33 to 34.</li> </ul>
6. (Future) fire suppression actions are not disclosed, as NEPA requires.	(Future) impacts of fire suppression actions need to be disclosed in the EA.	<ul style="list-style-type: none"> <li>▪ The respondent presented a similar comment during the scoping phase (EA, Appendix C, page C-16, Issue #4).</li> </ul>
7. The EA takes a very narrow, simplistic view of the science of fuel reduction and ignores scientific information that argues against it conclusions.	The EA must be re-written to acknowledge the controversies, and remove its already-made decision basis.	<ul style="list-style-type: none"> <li>▪ The respondent presented a similar comment during the scoping phase (EA, Appendix C, page C-15, Issues and C20, Issue #13). The ID Team developed an alternative based on these comments/suggestions, which was not considered in detail for reasons provided in the EA (page 10).</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

<b>OBJECTOR: THE ECOLOGY CENTER &amp; ALLIANCE FOR THE WILD ROCKIES</b>		
<b>ISSUE</b>	<b>SUGGESTED REMEDY</b>	<b>RESPONSE / NEPA DOCUMENTATION REFERENCE</b>
		<ul style="list-style-type: none"> <li>▪ Several factors have contributed to the current risk of a 'stand-replacement' (catastrophic) wildland fire within the wildland/urban interface areas in the project area. In addition to fire exclusion (fire suppression), these factors include the drought conditions experienced in the northwest during the past decade, and the increased human development of and occupation of private lands within the wildland/urban interface. The implementation of the proposed action is consistent with current fire policy, which includes national, regional, and local emphasis and objectives for the reduction of hazardous fuels within the wildland/interface areas. The proposed action is consistent with the National Fire Plan, the Healthy Forests Initiative, the Healthy Forests Restoration Act, and the Seeley Swan Fire Plan (Project File ExhibitH-20).</li> <li>▪ The ID Team has reviewed and considered science references provided by the objector. Copies of these references are included in the Project File, Section I).</li> </ul>
8. Please consider that thinning can result in faster fire spread than in the unthinned stand.	None	<ul style="list-style-type: none"> <li>▪ The project design features include reducing existing fuels. All cut non-utilized material would either be moved off-site for disposal, or treated on-site (EA, Appendix B, page B-11).</li> <li>▪ The fuels analysis shows that after treatment, which includes the removal/disposal of surface fuels created by the proposed fuel reduction treatments (EA, Pg. 39 and Appendix B, page B-11), that compared to existing conditions, the intensity, rate of spread and resistance to control would be reduced (EA, page 12, Project File ExhibitG-10, pgs. 3-22 – 3-23).</li> <li>▪ Project design features include the removal of surface fuels created by the proposed fuel reduction treatments (EA, Appendix B, pageB-11).</li> <li>▪ The proposed vegetation treatments are designed to reduce tree crown density by removing overtopped and intermediate trees (thinning from below) (EA, Appendix B, page B-6).</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
9. In terms of fuel reduction objectives in relation to wildfire risk to private land and firefighters, the proposal's definition of Wildland-Urban Interface is far too vague.	The proposal would conceptually be much more scientifically sound in adopting the Community Protection Zone (Nowicki, 2002).	<ul style="list-style-type: none"> <li>▪ The definition of Wildland-Urban Interface, as defined in the National Fire Plan, was used for this analysis and EA.</li> </ul>
10. Areas beyond the Community Protection Zone should be emphasized for natural forest succession.	<p>Active recovery efforts of road rehabilitation, road removal, and stream bank stabilization will be done in areas that have been damaged through human management.</p> <p>Thinning from below would be implemented <b>to</b> reduce fire hazard in the Community Protection Zone.</p>	<ul style="list-style-type: none"> <li>▪ The purpose and need for this proposal does not include the active recovery actions recommended in this objection (EA, pg; 4); however, project design features do include restoration actions such as application of road BMPs to eliminate existing sediment sources and the treatment of noxious weeds (EA, Appendix B).</li> <li>▪ As described in the EA (Appendix B, pgs. B-6 – B-8), the proposed treatments do include thinning from below (modified low thinning).</li> </ul>
11. Where as the EA warns repeatedly about the continuing fire risk to private land and structures under the no-action scenario, the EA fails to follow through and explain those same fire effects' implications for ecological functioning. The EA basically states, "no effects" for alternative 1.	None	<ul style="list-style-type: none"> <li>▪ The EA (pages 12 – 15) provides comparison of the relevant environmental effects between the proposed action and the no-action alternatives. The specialist's reports (Project File, Section G) provide a detailed disclosure of the potential environments effects of both alternatives, which are summarized in the EA (pages 19 – 44).</li> <li>▪ In respect to the black-backed woodpecker, the BE for sensitive wildlife species (Project File ExhibitG-4, page 3) discloses that "the No Action alternative would maintain the existing situation. There would be no direct physical change to the landscape and no direct effect on black-backed woodpeckers. Indirectly, if a wildfire occurs in the future and spreads to become a large fire on the landscape due to fuel buildup in the Holland Pierce area, it would not be a negative circumstance for the black-backed woodpecker since this woodpecker responds positively to wildfire events. <b>Note: per the objectors request, a copy of the BE for sensitive wildlife species was mailed to the objector on September 9, 2005.</b></li> </ul>
12. The EA claims that logs are merely a by-product	None	<ul style="list-style-type: none"> <li>▪ The objector has presented a similar comment</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
 APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
<p>of the “treatments” yet fails to adopt any meaningful limit to the size of trees to be cut.</p>		<p>during the scoping phase of this project (EA, Appendix C, pg. C-7, Issue #1).</p> <ul style="list-style-type: none"> <li>▪ The proposed action includes design features to retain the biggest and best trees (EA, Appendix B, pages B-6 – B-8; Silviculturist’s Report (Project File ExhibitG-12).</li> <li>▪ The primary prescription is a modified low thinning (thinning from below) (EA, pg. B-6; (Project File ExhibitG-12, pgs. 15 – 22) which tends to target smaller trees in the stand. The purpose and need for this proposal does not include the generation of wood products (EA, pg. 4); however, the tree thinning associated with the fuel reduction treatments would generate approximately 3.5 million board feet of commercial forest products which will help finance the non-commercial treatment areas (Project File ExhibitG-23, pg. 9).</li> </ul>
<p>13. The EA does not demonstrate compliance with the (Regional FS) Soil Quality Standards (SQS).</p>	<p>None</p>	<ul style="list-style-type: none"> <li>▪ The EA (page 20) discloses that the implementation of the proposed action would meet the Region 1 Soil Quality Standards.</li> <li>▪ The proposed action includes design features to protect the soil resource (EA, Appendix B, pages B-2–B-3).</li> <li>▪ The cumulative effects analysis for the soils resource (Project File ExhibitG-2) provides information and quantifies detrimental soil disturbance resulting from past management actions.</li> <li>▪ The project soil scientist has conducted on-the-ground surveys to determine the existing level of detrimental soil disturbance from past management actions within the activity areas (Project File ExhibitG-2).</li> </ul>
<p>14. The EA does not disclose quantified data on existing and cumulative detrimental soil disturbance from livestock grazing and off-road vehicle uses in the project area.</p>	<p>None</p>	<ul style="list-style-type: none"> <li>▪ The EA discloses that the implementation of proposed action would meet Regional Soil Quality Standards (EA, pg. 20).</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

<b>OBJECTOR: THE ECOLOGY CENTER &amp; ALLIANCE FOR THE WILD ROCKIES</b>		
<b>ISSUE</b>	<b>SUGGESTED REMEDY</b>	<b>RESPONSE / NEPA DOCUMENTATION REFERENCE</b>
		<ul style="list-style-type: none"> <li>▪ The Forest Service currently is administrating two grazing allotments (Holland and Barber Creek Allotments) within the Holland Pierce Fuels Reduction and Forest Health Project Area. The terms and conditions of the grazing allotment special use permits include the monitoring of impacts of grazing on forest vegetation, streambank stability, and soil compaction which has been ongoing. The special use permits require the application of mitigation measures, should unacceptable or adverse impacts be present. The ID Team considered the impacts of grazing on streambank stability and soil compaction (EA, page 38, Project File Exhibit H-19). Monitoring of allotments has found very limited impact from grazing on stream bank stability, and that the limited grazing which occurs has not led to significant soil compaction. This information is disclosed in more detail in the South Swan Grazing Allotments EA (Project File Exhibit H-19).</li> <li>▪ The project soil scientist's report (Project File ExhibitG-2) discloses that within the project area, there is 15.2 acres of detrimental soil disturbance resulting from livestock grazing associated with the two grazing allotments.</li> <li>▪ The project soil scientist has conducted on-the-ground surveys to determine the existing level of detrimental soil disturbance resulting from past management actions (past timber harvest, road construction, and trail construction), human uses, and livestock grazing within the activity areas (Project File Exhibit G-2).</li> </ul>
15. The EA also ignores the fact that areas to be affected by temporary roads and log landings must be included in activity area calculations. These subjects are glossed over from a cumulative effects perspective.	None	<ul style="list-style-type: none"> <li>▪ The EA discloses that the implementation of proposed action would meet Regional Soil Quality Standards (EA, pg. 20).</li> <li>▪ The project soil scientist's analysis of the potential effects on soil resource discloses that timber harvest and temporary road construction would result in 248 acres and 22 acres of detrimental soil disturbance</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

<b>OBJECTOR: THE ECOLOGY CENTER &amp; ALLIANCE FOR THE WILD ROCKIES</b>		
<b>ISSUE</b>	<b>SUGGESTED REMEDY</b>	<b>RESPONSE / NEPA DOCUMENTATION REFERENCE</b>
		respectively (Project File ExhibitG-2).
16. The FS's determination that it may permanently damage the soil on up to 15% of an activity area, and still meet NMFA and planning regulations is arbitrary.	None	<ul style="list-style-type: none"> <li>▪ The respondent has presented a similar comment during the scoping phase of this project (EA, Appendix C, page C-2, Issue #2).</li> <li>▪ The soil analysis followed Regional guidelines for soil analysis as specified in FSM 2500-99-1. The subject of allowing detrimental soil disturbance on up to 15 percent of an activity area is discussed frequently. This issue is discussed in detail in the soil scientist's report (Project File ExhibitG-2). Until such time that ongoing research better defines acceptable limits of soil detrimental disturbance, this is a reasonable, acceptable amount. Powers and others (1990) describe the use of a 15 percent as being the lowest magnitude of change detectable given current monitoring technology. It is possible to measure the aerial extent of detrimental soil disturbance across an activity area. It is reasonable to assume that by maintaining at least 85 percent of an activity area in undisturbed or minimally disturbed, non-detrimental disturbance conditions we are maintaining soil quality.</li> </ul>
17. The FS has never assessed "land productivity" losses due to the infestations of noxious weeds caused by soil disturbance associated with its land management practices.	None	<ul style="list-style-type: none"> <li>▪ The respondent has presented a similar comment during the scoping phase of this project (EA, Appendix C, page C-2, Issue #3).</li> <li>▪ Project design features included measures to minimize the introduction and/or spread of noxious weeds within the Project Area. Weed abatement design features include the spraying of weeds along up to 30 miles of designated NFS roads, the application of a seed mix on disturbed sites such as temporary roads, skid trails and landings, and the requirement for equipment to be steam cleaned before transport to the project area (EA, Appendix B, pages 11 and 12). As mentioned in the response to the concern / issue #1 above, the ID Team has developed Project Design Features to protect the soil resource and</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

<b>OBJECTOR: THE ECOLOGY CENTER &amp; ALLIANCE FOR THE WILD ROCKIES</b>		
<b>ISSUE</b>	<b>SUGGESTED REMEDY</b>	<b>RESPONSE / NEPA DOCUMENTATION REFERENCE</b>
		minimize impact on soil productivity (EA, Appendix B, pages 2 and 3).
<p><b>18.</b> The EA vaguely cites (but doesn't describe) monitoring results it claims prove the mitigation measures would be effective, yet cites nothing to validate their use in the project area. Also, the EA fails to cite the results of monitoring that prove they are effective in protecting soil properties and maintaining soil productivity.</p>	None	<ul style="list-style-type: none"> <li>▪ The project soil scientist has conducted on-the-ground surveys to determine the existing level of detrimental soil disturbance within the activity areas (Project File ExhibitG-2). Based from the soil scientist's on-the-ground findings, project design features have been developed to protect the soil resource (EA, Appendix B, pages B-2–B-3).</li> <li>▪ The project soil scientist used the findings from similar past projects on the Flathead National Forest to validate the expected results of the design features developed to protect the soil resource (Project File, Exhibits H-12, H-13, H-14, and H-15)</li> </ul>
<p><b>19.</b> The EA admits that the WATSED model “has limitations on its accuracy” but fails to disclose the meaning of those limitations in relation to this project-specific analysis. The Holland-Pierce EA fails to present “confidence intervals, standard deviations or standard errors in association with its conclusions” regarding the use of WATSED as well as all other resource impacts estimations or modeling relied upon in the EA.</p>	None	<ul style="list-style-type: none"> <li>▪ The EA discloses that the WATSED model is a predictive tool and as such has limitation on its accuracy and that it is used to provide a relative comparison of effects of the existing condition and the proposed action (EA, page 21).</li> <li>▪ The hydrologist's specialist report includes a discussion of the WATSED model usefulness and limitations (Project File ExhibitG-3).</li> </ul>
<p><b>20.</b> The EA fails to acknowledge the degree to which roads increase peak flows above the amounts on the WATSED model estimates. The very existence of the current road network is causing major water quality impacts, not disclosed in the EA.</p>	None	<ul style="list-style-type: none"> <li>▪ The ID Team considered the potential impacts on water quality. The Project Hydrologist has made on-site evaluation of the proposed treatment units to determine existing conditions for the water resource (Project File Exhibit G-3). The ID Team has developed Project Design Features to protect the water resource and minimize impacts on water quality (EA, Appendix B, pages B-3 and B-4). The effects of implementing this proposal on water quality have been analyzed and disclosed (EA, pages 20-21; Project File Exhibit G-3). In addition, the ID Team has developed Project Design Features to minimize impacts on the fisheries resource (Appendix B, pages B-4 and B-5). The effects of implementing this proposal on the</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
		<p>fisheries resource have been analyzed and disclosed (EA, pages 22-23; Project File Exhibit G-7).</p> <ul style="list-style-type: none"> <li>▪ The Montana Department of Environmental Quality has completed a TMDL for Swan Lake Watershed. No streams within the analysis area are on the 303(d) list. A sediment source survey associated with the development of the Swan Lake Watershed TMDL identified 65 sites on NFS lands within the Holland Pierce project that were potential sediment sources. Based on additional field reviews, 19 of these 65 sites were identified as contributing sediment.</li> <li>▪ Five of these sediment sources will be eliminated with the implementation of Holland Pierce Fuels Reduction and Forest Health proposal.</li> <li>▪ The remaining 12 sites are located on roads not associated with the Holland Pierce proposal and will be addressed as funding is made available (Project File Exhibit H-17). The Swan TMDL is incorporated by reference in the Project File as Exhibit H-24.</li> <li>▪ All sediment sources that were identified through on-the-ground surveys are included and prioritized in the supporting documentation for the TMDL, and a Technical Advisory Committee (TAG) is finding grants and other methods to remedy sediment sources whether they are in a "listed" stream or not. As stated in Project File Exhibit G-3, no streams within the analysis area are on the 303d list, and the project would eliminate some of these existing sources, leading to improvements in this regard over the existing condition. For these reasons it is felt that water quality protection and TMDL objectives for the Swan Lake watershed will not be adversely affected by this project. In addition, the Interdisciplinary Team (ID Team) has developed Project Design Features to protect the water resource and minimize impact on water quality (EA, Appendix B, pages B-3 and B-4). These design features include timing and operations restrictions, the reclamation of temporary roads, skid trails, and landings, as well as</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

<b>OBJECTOR: THE ECOLOGY CENTER &amp; ALLIANCE FOR THE WILD ROCKIES</b>		
<b>ISSUE</b>	<b>SUGGESTED REMEDY</b>	<b>RESPONSE / NEPA DOCUMENTATION REFERENCE</b>
		<p>other features to protect the soil resource (Appendix B, pages 20-21). The effects of the alternatives on the water resource are disclosed in the EA (pages 20-21 and in the hydrologist's specialist report (Project File Exhibit G-3).</p> <ul style="list-style-type: none"> <li>▪ The Proposed Action includes the construction and subsequent reclamation of approximately 3.8 miles of temporary road needed to access the proposed treatment units. The proposed temporary road locations do not require any stream crossings. The ID Team has developed project design features to minimize the environmental impacts of the temporary road construction (EA, Appendix B). The impacts of the temporary roads are analyzed and their effects disclosed by resource area in the EA (pages 19-39; and in the Project File Section G).</li> </ul>
<p>21. The Forest Plan originally designated the pileated woodpecker and pine marten as MIS for old growth, and as the comments on and appeals of Amendment 21 discuss, illegally dropped them from the MIS list. As it stands, the Forest Plan is completely inadequate for maintaining viable populations of species that rely on such habitat.</p>	None	<ul style="list-style-type: none"> <li>▪ The respondent has presented a similar comment during the scoping phase of this project (EA, Appendix C, page C-13, Issue #1). This project does not propose treatment within old growth forest habitat. The project Wildlife Biologist has conducted field reviews and has validated that the proposed fuel reduction and forest health actions does not include vegetative treatments within old growth forest habitat (Project File Exhibit G-5). A BA and BE has been prepared for T&amp;E and sensitive species (Project File Exhibits G-1 and G-4 respectively). The analysis includes the 'Effects at Forest and Regional Scales – Compatibility with NFMA Requirement for Maintaining Species Viability (Project File Exhibit H-23).</li> <li>▪ The EA discloses the effects of the proposed action on old growth associated wildlife species (EA, pg. 30).</li> <li>▪ A recent <u>Friends of the Wild Swan v. Barbouletos</u> US District Court for the District of Montana ruling upheld the FNF Amendment 21 to the Forest Plan, which included the dropping the pileated woodpecker and pine martin as management indicator species (Project File Exhibit H-29).</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
22. The EA is based upon an inadequate cumulative impacts analysis for old growth dependent wildlife species. No such analysis was conducted for the Holland Pierce proposal.	None	<ul style="list-style-type: none"> <li>▪ The objector has presented a similar comment during the scoping phase of this project (EA, Appendix C, page C-13, Issue #1).</li> <li>▪ This project does not propose treatment within old growth forest habitat. The project wildlife biologist has conducted field reviews and has validated that the proposed fuel reduction and forest health actions does not include vegetative treatments within old growth forest habitat (Project File Exhibit G-5). A BA and BE has been prepared for T&amp;E and sensitive species (Project File Exhibits G-1 and G-4 respectively. The analysis includes the 'Effects at Forest and Regional Scales – Compatibility with NFMA Requirement for Maintaining Species Viability (Project File Exhibit H-23).</li> <li>▪ The EA discloses the effects of the proposed action on old growth associated wildlife species (EA, pg. 30).</li> <li>▪ The past, present, and reasonably foreseeable future actions considered in the cumulative effects analysis for old growth associated species are summarized in the EA on pages 18-19. Exhibit G-5 of the Project File includes cumulative effects work sheets for old growth dependent wildlife species.</li> </ul>
23. The FNF has failed to cite any evidence that its “managing for old growth habitat”	None	<ul style="list-style-type: none"> <li>▪ The purpose and need for the proposal is to reduce the level of existing hazardous fuels within the WUI areas and to improve forest health conditions within the proposed fuel reduction treatment units (EA, pg. 4). The management of old growth habitat is not included in the purpose and need for this proposal. This project does not propose treatment within old growth forest habitat (EA, pg. 30). The project Wildlife Biologist has conducted field reviews and has validated that the proposed fuel reduction and forest health actions does not include vegetative treatments within old growth forest habitat (Project File Exhibit G-5).</li> </ul>
24. Logging, road building, and other disturbance	None	<ul style="list-style-type: none"> <li>▪ The EA (page 29) discloses that the</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
 APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
<p>associated with the project and other cumulative impacts could affect northern goshawk. There must be protection of the 5400 acre goshawk foraging areas for the known active territories. The issue of fragmentation should have been more thoroughly considered with respect to goshawks.</p>		<p>implementation of the proposed action may impact individuals or habitat, but will not likely result in a trend toward Federal listing or reduced viability of the population or species.</p> <ul style="list-style-type: none"> <li>▪ The project wildlife biologist has prepared a Biological Evaluation for the goshawk (Project File Exhibit G-4), which had the following conclusions:</li> </ul> <p>Direct and Indirect Effects</p> <ul style="list-style-type: none"> <li>▪ The mechanized and non-mechanized fuel treatment could directly affect northern goshawk by decreasing the amount of potential nesting habitat. Goshawks are normally associated with mature to old growth forest and thought to prefer closed canopy forest. If this is the case, the fuel reduction treatment of thinning the overstory may make the treated stands undesirable for goshawk nesting habitat. However, Hayward and Escano (1989) found that nest sites in northwest Montana were often located in older stands that supported widely spaced large trees. In this case, a light thin of the overstory (e.g. 40 to 60 percent canopy cover in FRZ's) would not render the treatment area unsuitable for goshawk and might even improve conditions. Thinning the overstory in some stands may help increase the availability of future large tree habitat.</li> <li>▪ A negative direct effect would be the removal of snags, which are potential nesting sites for the northern goshawk. On approximately 370 acres (Defensible Fuel Profile Zones) snags would be removed. In the Fuel Reduction Zones (FRZ's) snags would be retained on site to meet Forest Plan standards. Some snags could still be removed, so there would still be the potential loss of a portion of the possible goshawk nesting sites on 1,755 acres.</li> <li>▪ There would be no fuel reduction or forest health treatment in wetland or riparian areas. These areas may be used by goshawks for nesting, as post fledging areas, or as foraging habitat. There would be no treatment in old</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
		<p>growth habitat. Old growth stands have a higher potential than other stands in the Holland Pierce area of providing nesting, post fledging, and foraging habitat.</p> <ul style="list-style-type: none"> <li>▪ Fuel reduction treatment would be restricted in designated spring habitats for grizzly bear (&lt;5,200 feet elevation) from April 1 – June 15. This design feature would provide a measure of security for any goshawks nesting in the area.</li> <li>▪ There is no new road construction proposed under Alternative 2. Approximately 8.6 miles of temporary road would be constructed on National Forest land. There is an additional 0.5 miles of temporary road proposed on private land. The roads would be reclaimed following vegetative treatments. An increase in public access increases the risk of losing high quality snags to firewood cutters. Public use of 'closed' roads and temporary roads would not be permitted. Reclaiming roads following use should help reduce the risk of snag loss over the long-term.</li> <li>▪ The proposed fuels reduction project also includes approximately 2,059 acres of prescribed burning on mid to upper elevation slopes. The habitats where prescribed burning is proposed are not typical northern goshawk habitat (e.g. mature to old growth closed canopy forest habitats). The potential for negative direct or indirect effects to the northern goshawk as a result of prescribed burning in these stands would be low.</li> <li>▪ There is the potential for individual goshawks that may be foraging in the Holland Pierce area to be temporarily displaced from certain areas by the increase in human activity associated with the fuel reduction / forest health project. The nature of this displacement would be short-term and the effects insignificant.</li> </ul> <p>Cumulative Effects</p> <ul style="list-style-type: none"> <li>▪ The northern goshawk is associated with mature and older forest. Although there is potential foraging and</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
 APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
		<p>nesting habitat for the northern goshawk throughout the Swan Valley, due to past logging and road building on NFS, Plum Creek, and State lands, the potential habitat is more fragmented, with smaller patch sizes available for nesting habitat and a greater distance between blocks of potentially suitable foraging and nesting habitat.</p> <ul style="list-style-type: none"> <li>▪ In addition to activities associated with forest management, there are other established human activities and developments in the area, including roads, recreational use (hiking, fishing, camping, hunting), and firewood gathering. There is also a high density of year-round residents in the Holland Pierce vicinity.</li> <li>▪ Activities proposed under Alternative 2 are not expected to contribute significantly to negative cumulative effects in the area due to the location of the fuel treatment project in areas of higher human use near private land, and the availability of higher quality habitat outside the fuel reduction area. Potential nesting, post fledging, and foraging habitat is still available in riparian/wetland areas, and in old growth stands in the Holland Pierce area and throughout the Swan Valley.</li> <li>▪ The project wildlife biologist analysis included the preparation of an Effects at Project, Forest, and Regional Scales – Compatibility with NFMA Requirements for Maintaining Species Viability analysis for the Holland Pierce Fuels Reduction and Forest Health Project, which includes the northern goshawk (Project File ExhibitH-23, page 26).</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
<p>25. The assumption that a project will not adversely impact the lynx simply because LCAS standards and guidelines are met has never been verified. In fact, the Holland-Pierce EA fails to demonstrate project area consistency with the LCAS standards, both programmatic and project-level. The Flathead NF cannot meet lynx denning requirements unless it is meeting Forest Plan old growth requirements. As the Flathead NF has not yet proved, it is in compliance with old-growth standards or adequately dealing with forestwide old growth declines, the project is not in compliance with the LCAS.</p>	None	<ul style="list-style-type: none"> <li>▪ The objector has presented a similar comment during the scoping phase of this project (EA, Appendix C, page C-11, Issue #1).</li> <li>▪ The proposal does not include fuels reduction treatments within lynx foraging habitat. The EA includes an analysis and disclosure of the effects of the Proposed Action on the Canada lynx (EA, pages 26-27); the Project Wildlife Biologist's Specialists Report provide a detailed description of the effects analysis for the lynx, which includes the potential impacts to lynx foraging habitat (Project File ExhibitG-6). The conservation measures, including standards and guidelines, outlined in the LCAS have been followed throughout the development of the Holland Pierce Fuels Reduction and Forest Health proposal (EA, page 27, Project File Exhibit G-1).</li> <li>▪ A BA for the Canada lynx has been prepared for this project, which concludes with a "may effect, not likely to adversely affect" determination (Project File Exhibit G-1).</li> <li>▪ The analysis for this proposal includes the 'Effects at Forest and Regional Scales – Compatibility with NFMA Requirement for Maintaining Species Viability', which includes the Canada lynx (Project File Exhibit H-23).</li> </ul>
<p>26. The proposed project could adversely impact fisher habitat. The EA did not consider the uncertain and precarious population status of the fisher.</p>	None	<ul style="list-style-type: none"> <li>▪ The EA (page 29) discloses that the implementation of the proposed action may impact individuals or habitat, but will not likely result in a trend toward Federal listing or reduced viability of the population or species.</li> <li>▪ The project wildlife biologist has prepared a Biological Evaluation for the fisher(Project File ExhibitG-4), which had the following conclusions:</li> </ul> <p><u>Direct and Indirect Effects</u></p>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
 APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
		<ul style="list-style-type: none"> <li data-bbox="1287 354 1900 732"> <p>▪ Late successional, coniferous forests, often riparian, are considered optimal or preferred habitat for fisher, with overhead tree cover being a key habitat component (Ruggerio et.al. 1994). In a study done in Idaho, the average diameter of trees used by fisher as resting sites was 22 inches (Jones 1991). The Action alternative does not propose any fuel reduction or forest health treatment in wetland or old growth habitats. These are potentially the highest quality fisher habitat in the Holland Pierce area and the habitats where fisher are most likely to occur. In addition, design features in Alternative 2 provide for large buffers around all wet areas. These factors would help mitigate potential negative effects to fisher in the Holland Pierce area.</p> </li> <li data-bbox="1287 753 1900 1024"> <p>▪ Fishers have been found to prefer to rest in stands that exceed 60 percent canopy cover, and avoid stands with less than 40% canopy cover (Jones 1991). Any fisher occupying forested stands that are proposed for fuel reduction treatment would likely be displaced long term due to the reduction in canopy cover and the removal of all snags (DFPZ's) or a majority of the snags (FRZ's). Again, the timber stands proposed for treatment are less likely habitat for fisher. Consequently, the potential for displacing fisher would be low.</p> </li> <li data-bbox="1287 1045 1900 1365"> <p>▪ There is temporary road construction proposed in the Action alternative. Temporary roads would be reclaimed following use. Other roads that are managed as closed roads would be used for accessing fuel treatment areas. Public use of 'closed' roads would not be permitted, reducing the risk of losing high quality snags (denning habitat) to firewood cutters. Prescribed fire has been proposed on mid to upper elevation slopes. There is no prescribed burning proposed in wet areas or old growth habitats. Prescribed fire areas are less likely habitat for fisher and, as described above, consequently, the potential for displacing fisher would be low.</p> </li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
		<p><u>Cumulative Effects</u></p> <ul style="list-style-type: none"> <li>▪ As described in the Upper Swan Valley Landscape Assessment (2004), the Swan Valley has a well-developed system of glacial potholes, wet meadows, seeps, and riparian connections throughout the valley floor along both sides of the Swan River. The ecological contribution that these wetland habitats contribute to various wildlife species, including the fisher, is very important. There has been a loss of ecological integrity to many of these complexes as a result of residential development, forest management, permanent road construction, drought, and both fire suppression on the one hand and large-scale wildfire on the other. All of these factors combined have undoubtedly affected the amount and the connectivity of potential fisher habitat in the Upper Swan Valley. The potential effects to fisher as a result of implementing the proposed fuel reduction project would not add significantly to the cumulative effects described above. Excluding high quality habitats with riparian and old growth features, where fisher are most likely to occur, would undoubtedly lower the potential for negative effects. In addition, the areas where fuel reduction treatments are proposed are those areas where high human use is most prevalent and where fisher occupancy would be expected to be the lowest. Adverse cumulative effects are not expected.</li> <li>▪ The project wildlife biologist analysis included the preparation of an Effects at Project, Forest, and Regional Scales – Compatibility with NFMA Requirements for Maintaining Species Viability analysis for the Holland Pierce Fuels Reduction and Forest Health Project, which includes the fisher (Project File ExhibitH-23, pg. 14).</li> </ul>
27. The EA does not adequately consider cumulative effects on upland habitat for boreal toads. In fact, the EIS has no genuine analysis of cumulative impacts of logging activities on boreal toads at all.	None	<ul style="list-style-type: none"> <li>▪ The EA (page 29) discloses that the implementation of the proposed action may impact individuals or habitat, but will not likely result in a trend toward Federal listing or reduced viability of the population</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
 APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
		<p>or species.</p> <ul style="list-style-type: none"> <li>▪ The project Wildlife Biologist has prepared a BE for the western (boreal) toad(Project File ExhibitG-4), which had the following conclusions:           <p><u>Direct and Indirect Effects</u></p> <ul style="list-style-type: none"> <li>▪ Under the Action alternative there is no fuel reduction or associated activities proposed in riparian areas. There would be no direct or indirect effects to important toad breeding habitat associated with streams, ponds, or other natural wetland areas. Protection of breeding and nursery habitat would occur through a combination of protective measures in the Montana Streamside Management Zone Law, Montana Water Quality Act, and INFISH standards. However, roadside ditches that hold water long enough into the summer to provide breeding sites would <u>not</u> be protected unless they were associated with streams or other protected sites.</li> <li>▪ The proposed mechanized fuel reduction on 2,125 acres and hand fuel reduction on 107 acres, and the associated temporary road construction, are likely to alter existing non-breeding habitat for the western toad. Based on this species' ability to occupy a wide variety of habitats, western toad use would probably still occur in the DFPZ's and FRZ's, although at lower population levels until vegetation recovers. If adult western toads are present during actual fuel reduction activity or during temporary road construction, individual mortality could occur.</li> </ul> <p><u>Cumulative Effects</u></p> <ul style="list-style-type: none"> <li>▪ In addition to activities associated with the proposed fuel reduction project, there are other established human activities and developments in the area, including timber management, road building and maintenance, livestock grazing, residential development, agricultural use, recreational activities, etc. that have</li> </ul> </li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
		<p>decreased the amount of functional breeding habitat and have decreased the security on non-breeding habitat in the Holland Pierce area and throughout the Upper Swan Valley.</p> <ul style="list-style-type: none"> <li>▪ The Action alternative would not contribute significantly to these cumulative effects because there would be no additional cumulative effects to breeding habitat as a result of the proposed fuel reduction project, and individual western toad mortality would be infrequent; not affecting the species at the population level.</li> <li>▪ The project wildlife biologist analysis included the preparation of an <i>Effects at Project, Forest, and Regional Scales – Compatibility with NFMA Requirements for Maintaining Species Viability analysis for the Holland Pierce Fuels Reduction and Forest Health Project</i>, which includes the western toad (Project File ExhibitH-23, pg. 10).</li> </ul>
<p>28. There is really no genuine cumulative effects disclosure for any Sensitive wildlife species in the EA, therefore, NFMA viability requirements have been completely bypassed. The EA does admit that the project will adversely affect many wildlife species, but the degree to which this might affect viability is not disclosed.</p>	<p>Modify EA to provide a detailed disclosure of the potential effects of the implementation of the proposed action on sensitive wildlife species.</p>	<ul style="list-style-type: none"> <li>▪ The EA provide a summary of the potential effects from the implementation of the proposed action on wildlife species (EA, pg. 29) and indicates that more information can be found in the Project File (Exhibit G-4)</li> <li>▪ The project wildlife biologist prepared a BE, which discloses in detail the potential effects of the implementation of the proposed action on sensitive wildlife species. Note: As requested by the objector, the Forest Service mailed copies of the BEs and BAs to the objector on September 7, 2005.</li> <li>▪ The project wildlife biologist analysis includes the <i>Effects at Project, Forest, and Regional Scales – Compatibility with NFMA Requirements for Maintaining Species Viability analysis for the Holland Pierce Fuels Reduction and Forest Health Project</i>, which includes the western toad (Project File ExhibitH-23, pg. 10).</li> </ul>
<p>29. The EA fails to disclose the analysis area used to consider old growth within the project</p>	<p>Revise the EA to disclose the analysis area used to consider old growth in the</p>	<ul style="list-style-type: none"> <li>▪ This project does not propose treatment within old growth forest habitat. The project Wildlife Biologist</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
 APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
area.	project area.	<p>has conducted field reviews and has validated that the proposed fuel reduction and forest health actions does not include vegetative treatments within old growth forest habitat (Project File Exhibit G-5). A BA and BE has been prepared for T&amp;E and sensitive species (Project File Exhibits G-1 and G-4 respectively. The analysis includes the 'Effects at Forest and Regional Scales – Compatibility with NFMA Requirement for Maintaining Species Viability (Project File Exhibit H-23).</p> <ul style="list-style-type: none"> <li>▪ The EA describes the environmental impacts of the proposal and alternatives in relation to whether there may be significant environmental effects as defined at 40 CFR 1508.27 (EA. Pg. 15).</li> <li>▪ The EA (pg. 15) indicates that the specialists reports (Project File, Section G) include descriptions of the analysis area (including spatial and temporal bounds) and descriptions of the existing conditions by resource area.</li> <li>▪ The analysis area for forest vegetation, which includes old growth forest habitat, includes the Project Area as illustrated in the EA (page 17, Figure 3) (Project File ExhibitG-12).</li> <li>▪ The analysis area for old growth associated wildlife species includes the Project Area as illustrated in the EA (page 17, Figure 3) (Project File ExhibitG-5).</li> </ul>
<p>30. The EA does not cite any evidence that there is adequate amounts and distribution of habitat available on the forest to maintain viable populations of Sensitive, Threatened, Endangered, and Management Indicator species. The EA is also unable to cite the results of required Forest Plan monitoring.</p>	None	<ul style="list-style-type: none"> <li>▪ The effects of the Proposed Action on threatened and endangered species are disclosed in the EA (pages 22-28; 34-35); the Project Wildlife and Fisheries Biologist's and the Botanist's Biological Assessments provide additional information and analysis detail for these all of these species (Project File, Exhibits G-1, G-8, and G-16 respectively).</li> <li>▪ The EA includes an analysis and disclosure of the effects of the alternatives on sensitive species (EA, pages 22-23; 28-29, and 36).</li> <li>▪ Biological Evaluations have been prepared for</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
		<p>sensitive fish, wildlife, and plant species (Project File, Exhibits G-9, G-4, and G-16 respectively).</p> <ul style="list-style-type: none"> <li>▪ The EA includes an analysis and disclosure of the effects of the alternatives on management indicator species (EA, pages 30-32); the Project Wildlife Biologist's Specialists Report provide a detailed description of the effects analysis for sensitive species (Project File ExhibitG-4).</li> <li>▪ The analysis for this proposal includes the 'Effects at Forest and Regional Scales – Compatibility with NFMA Requirement for Maintaining Species Viability', which includes the grizzly bear, Canada lynx, gray wolf and the bald eagle (Project File Exhibit H-23).</li> </ul>
<p>31. The EA relies on implementation of BMPs to support its claim that the project will meet Forest Plan and Clean Water Act requirements, however the severely damaged status of these streams argues against that simplistic assumption.</p>	None	<p>During the project design for this proposal, the IDT considered the effectiveness of BMPs in developing the Holland Pierce Fuels Reduction and Forest Health Project BMP measures (Project File ExhibitH-17).</p>
<p>32. The EA also fails to demonstrate consistency with the applicable portions of the Health Forest Restoration Act.</p>	None	<p>As stated in the EA (page 1) the Holland Pierce Fuels Reduction and Forest Health project has is under the authorities of the 2003 Healthy Forest Restoration Act (Project File ExhibitH-6). Specifically,</p> <p><b>CEQ guidance for the preparation of EAs for fuel reduction projects:</b></p> <ul style="list-style-type: none"> <li>▪ The EA should be “a concise public document,” no longer than 10 to 15 pages, that address four elements: <ul style="list-style-type: none"> <li>• need for the proposed action;</li> <li>• description of alternatives;</li> <li>• description of the environmental impacts of the proposed action and the alternatives; and,</li> <li>• a list of the agencies and persons consulted.</li> </ul> </li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
 APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE
		<ul style="list-style-type: none"> <li>▪ The EA should reference any supporting data, inventories, and other documents that were relied on in its presentation.</li> <li>▪ Interested agencies and the public must be involved in EA preparation to the extent practicable.</li> <li>▪ When a Finding of No Significant Impact is prepared, the EA should be attached and incorporated by reference.</li> </ul> <p><b>Project Criteria for Meeting HFRA Authority:</b></p> <ul style="list-style-type: none"> <li>▪ The project is located on NFS lands;</li> <li>▪ The project is not within a wilderness or wilderness study area;</li> <li>▪ The project is not in an area where removal of vegetation is prohibited by an act of Congress or Presidential proclamation;</li> <li>▪ The projects has been designed through a collaborative process;</li> <li>▪ The project objective is to protect communities by treating hazardous fuels;</li> <li>▪ The project is consistent with the Flathead National Forest Plan;</li> <li>▪ The proposed treatments are consistent with a Community Wildfire Protection Plan (Seeley-Swan Fire Plan);</li> <li>▪ No fuel reduction or forest health treatments are within old growth.</li> </ul>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

**OBJECTOR: THE ECOLOGY CENTER & ALLIANCE FOR THE WILD ROCKIES**

<b>ISSUE</b>	<b>SUGGESTED REMEDY</b>	<b>RESPONSE / NEPA DOCUMENTATION REFERENCE</b>
<p>33. In sum, these comments provide the Reviewing Officer many reasons why the EA is inadequate for protecting the land, water, and other resources in the project area and an EA or more preferably, an EIS, must be written to adequately deal with all these issues.</p>	<p>Prepare an EIS</p>	<p>The Responsible Official has determined that the management action included in this proposal is not a major Federal action; and, that the implementation of the proposal will not significantly affect the quality of the human environments. Accordingly, the Responsible Official has determined that an Environmental Impact Statement need not be prepared for this project (EA, Appendix A – Draft FONSI).</p>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

**OBJECTOR: FRIENDS OF THE WILD SWAN**

ISSUE	SUGGESTED REMEDY	RESPONSE / NEPA DOCUMENTATION REFERENCE																												
<p>34. The Project does not comply with the Swan Valley Conservation Agreement for grizzly bears and Flathead National Forest Plan Amendment 19 (specifically):</p> <ul style="list-style-type: none"> <li>▪ Hiding cover along open roads will be considerably reduced by this project, at least it appears that way with the scant information provided in the Environmental Assessment. The SCVA states that: "Visual Screening retention will be the management objective in areas adjacent to tall Open Roads.</li> </ul>	None	<p>The proposed action complies with the SVCA (EA, page 26; Project File Exhibit G-1, page 19, Table 10).</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #333; color: white;"> <th colspan="4" style="text-align: center;">Swan Valley Grizzly Bear Conservation Agreement</th> </tr> <tr style="background-color: #333; color: white;"> <th style="width: 30%;">SVCA Standard</th> <th style="width: 15%;">Pre-Treatment</th> <th style="width: 25%;">Post-Treatment</th> <th style="width: 30%;">Compliance</th> </tr> </thead> <tbody> <tr> <td>OPEN ROAD DENSITY: No more than 33% of a given Subunit shall exceed ORD of 1/mile/sq. mile.</td> <td style="text-align: center;">Existing 25%</td> <td style="text-align: center;">No Change</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>COVER: Cover will be managed so that a minimum of 40% is maintained in each sub-unit.</td> <td style="text-align: center;">Existing 70%</td> <td style="text-align: center;"><i>Minimal Change (Cover reduced within 370 acres of DFPZ treatment is, or approximately 1.5% of NFS lands within the sub-unit).</i></td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>COVER: Visual screening will be the management objective adjacent to open roads.</td> <td style="text-align: center;">--</td> <td style="text-align: center;">Visual screening will be retained along open roads</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>OPERATIONS and USES: Activities other than planting and limited burning should not be conducted in preferred habitats from 4/1 – 6/15.</td> <td style="text-align: center;">--</td> <td style="text-align: center;">No management activities in preferred habitat will occur during the 4/1 – 6/16 time frame.</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>COVER: Even-aged cutting units will be laid out so that no point in the unit is greater than 600 feet from cover.</td> <td style="text-align: center;">--</td> <td style="text-align: center;">N/A</td> <td style="text-align: center;">Yes</td> </tr> </tbody> </table> <p style="margin-top: 10px;">In actuality, hiding cover along open roads will be minimally affected by the proposed</p>	Swan Valley Grizzly Bear Conservation Agreement				SVCA Standard	Pre-Treatment	Post-Treatment	Compliance	OPEN ROAD DENSITY: No more than 33% of a given Subunit shall exceed ORD of 1/mile/sq. mile.	Existing 25%	No Change	Yes	COVER: Cover will be managed so that a minimum of 40% is maintained in each sub-unit.	Existing 70%	<i>Minimal Change (Cover reduced within 370 acres of DFPZ treatment is, or approximately 1.5% of NFS lands within the sub-unit).</i>	Yes	COVER: Visual screening will be the management objective adjacent to open roads.	--	Visual screening will be retained along open roads	Yes	OPERATIONS and USES: Activities other than planting and limited burning should not be conducted in preferred habitats from 4/1 – 6/15.	--	No management activities in preferred habitat will occur during the 4/1 – 6/16 time frame.	Yes	COVER: Even-aged cutting units will be laid out so that no point in the unit is greater than 600 feet from cover.	--	N/A	Yes
Swan Valley Grizzly Bear Conservation Agreement																														
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HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

<b>OBJECTOR: FRIENDS OF THE WILD SWAN</b>		
<b>ISSUE</b>	<b>SUGGESTED REMEDY</b>	<b>RESPONSE / NEPA DOCUMENTATION REFERENCE</b>
		<p>Holland Pierce project and the effects to grizzly bear, and other wildlife species, will be low.</p> <p>In the Fuel Reduction Zones (FRZ) there would be 40-60% cover retained. This amount of cover would provide adequate screening for wildlife. The highest potential for loss of hiding cover would be in the Defensible Fuel Profile Zones (DFPZ). In these areas the overstory would be reduced to 20-40 percent cover.</p> <p>Following is a discussion of units where DFPZ treatment is proposed:</p> <p>Unit 3– 20 acres DFPZ; not along an open road. This unit will probably not be included in final decision.</p> <p>Unit 7– 14 acres DFPZ; not along an open road.</p> <p>Unit 8– The open road through this unit is Rd. #9542. The DFPZ treatment is not proposed along the open road. It is proposed at the north end of the section adjacent to the private property boundary.</p> <p>Unit 9– The DFPZ is proposed along the western portion of the Forest Service boundary, adjacent to private property. This is not along the open road.</p> <p>Unit 10- This unit is a 19 acre DFPZ along Highway 83 and bounded by private property. The intention is to maintain approximately 40% overstory / visual screening along the Highway for scenic purposes as well as for wildlife, and to maintain 20-40% along the private property boundaries. Due to the location of this unit in a high human use area adjacent to a major state highway, the effects to grizzly bear would not be significant.</p> <p>Units 11 &amp; 12- The intention is to maintain visual screening along the open road. Most of these units are FRZ; there is a smaller portion, adjacent to private property, where the proposed treatment would be DFPZ.</p> <p>Unit 13- The DFPZ portion of this unit is along the private property boundary, not along the open road.</p> <p>Units 16 &amp; 17- These units are located along the Holland Lake road, across from the campground, boat launch, day use, nature trail, and lodge areas. Visual screening will be left along this high use road, mostly for scenic reasons. The major portions of these units are FRZ's.</p> <p>Units 19 &amp; 20- Along the open road the cover will be retained at 40%. If there is less cover retained (20-40%), it will be along the private property boundary. There are yearlong residences directly adjacent to these units. This is a high use human use area.</p> <p>Unit 23- The DFPZ is not along the open road, but adjacent to private property. The actual</p>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

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<b>ISSUE</b>	<b>SUGGESTED REMEDY</b>	<b>RESPONSE / NEPA DOCUMENTATION REFERENCE</b>
		<p>acreage is less than portrayed in the project proposal.</p> <p>Unit 24- Not along an open road.</p> <p>Unit 24a- This unit is along the main Holland Lake Road, which is heavily used by the public for recreation (campground, lodge, trails, etc.) and as access to yearlong residences. The visual screening will be maintained at approximately 40% with thicker areas of vegetation occurring throughout ('clumps').</p> <p>Unit 25- The DFPZ portion of this unit is not along an open road.</p> <p>Unit 29- The DFPZ portion of this unit is adjacent to a dispersed campsite and along Highway 83. Affects to wildlife would be minimal.</p> <p>Unit 34- This unit is along a closed road (the powerline road) and adjacent to Highway 83. Affects to usable hiding cover for wildlife would be minimal.</p> <p>There are also 7 areas/units where hand piling and burning along open roads would occur. The hand piling work would only occur up to 30 feet from the center line of the road, mostly within the road prism, and would occur along open roads near private property and homes. The minimal loss of visual screening in these areas would not cause significant negative affects to grizzly bear or other wildlife.</p>
<p>35. The EA does not disclose how much hiding cover is currently along open roads nor whether any cover will be maintained for grizzly bears, elk and other wildlife.</p>	None	<p>The project wildlife considered the potential effects to grizzly bear cover from the implementation of the proposed action (EA, pg. 25; Project File ExhibitG-1 (BA), pgs. 16-21).</p> <p>At this time, due to the explanation above, hiding cover within the project area is not considered a limiting factor for grizzly bears or other wildlife. The proposed project would not cause significant effects to wildlife as a result of loss of hiding cover. As displayed in the Swan Valley Grizzly Bear Conservation Agreement Monitoring Report (2004) the hiding cover in the Buck Holland Subunit is presently at 70% for all ownerships.</p> <p>The ID Team developed project design features to protect wildlife habitat (EA, Appendix B, pgs. B-14 – B-15)</p>
<p>36. The EA discloses that a potential direct effect to grizzly bears would be an immediate decrease in the amount of available forage and cover. It further states that hiding cover would take approximately 5 to 15 years to recover depending on stand conditions.</p>	None	<p>See above discussion.</p>

HOLLAND PIERCE FUEL REDUCTION & FOREST HEALTH PROJECT DECISION NOTICE  
APPENDIX C - OBJECTIONS

<b>OBJECTOR: FRIENDS OF THE WILD SWAN</b>		
<b>ISSUE</b>	<b>SUGGESTED REMEDY</b>	<b>RESPONSE / NEPA DOCUMENTATION REFERENCE</b>
<p>However, if the desired future condition for this area is to maintain an open forest to reduce fuels in the wildland urban interface then the long-term effects are that hiding cover will not be allowed to regenerate. This was not analyzed or discussed in the EA.</p>		
<p>37. Construction of temporary roads is an increase in road densities. Flathead Forest Plan Amendment 19 requires no net increase in road densities in areas with less than 75% Forest Service ownership.</p> <p>We do not believe that it is prudent for the Forest Service to build more roads, temporary or not, when this landscape already has so many, road closures are not effective and there are cases in this area of illegal ORV use.</p>	None	<ul style="list-style-type: none"> <li>▪ The project follows standards and guides (SVGBCA and A19) for open and closed roads, as well as for temporary roads (Project File ExhibitG-1, pgs. 18-20).</li> <li>▪ We do not agree that the majority of road closures are not effective.</li> <li>▪ We will monitor illegal use of closed roads or temporary roads (EA, Appendix B, pg B-16).</li> </ul>
<p>38. The EA does not disclose the timeframe for this monitoring before, during or after the project. What funding is available for this monitoring? What funding is available for mitigation? If motorized use increases during the project what steps will be taken to address it and the rest of the project?</p>	None	<p>There would be monitoring during the project (Sale Administration). Post sale monitoring would occur to the point where it is determined whether or not there is a problem. Funding can be obtained in a number of ways: stewardship money, appropriated dollars, grants, etc. This is a high priority item and will be a high priority for the District (EA, Appendix B, pg. B-16).</p>
<p>39. Other questions that need to be addressed are: Does this include monitoring trails to see if motorized use is increasing? Will the trails in the area be closed to motorized use? What enforcement is available?</p>	None	<ul style="list-style-type: none"> <li>▪ Trails that may be potentially affected as a result of the proposed fuel reduction project would be monitored (EA, Appendix B, pg. B-16).</li> <li>▪ The ID Team developed project design features to protect wildlife habitat, sensitive plants, and water quality (EA, Appendix B)</li> <li>▪ Project design features include monitoring measures for wildlife species, sensitive plants and water quality (EA, Appendix B, pgs. B-16 – B-19).</li> </ul>