

Mid Swan Blowdown Salvage Decision Notice
Appendix 5 – Response to Comments Received on the Environmental Assessment

BB-1. Appelt	Comment #	Response
 <p>"Appelt" <pipercreek@blackfoot.net> 03/17/200908:21 PM</p> <p>To: jdunham@fs.fed.us cc: <stevenbrady@fs.fed.us> bcc: Subject: Comment on Swan Salvage Sale Project</p> <p>Thank you for the opportunity to comment on this very worthwhile endeavor. We are particularly interested in this project as we are full-time residents of the blow-down area, experiencing the loss of a number of trees on our own and our neighbors' properties.</p> <p>We would like to mention here that we are grateful for the participation of the Swan Eco Center in assisting with our cleanup, which has done much good, not just for appearance but for reduction of potential fire danger and tree disease.</p> <p>It is our belief that these beneficial goals will apply as well to the entire area of the blowdown, but especially in the area around the Swan River bridge on Piper Creek Road.</p> <p>In our 12 years of full and part-time residence here, we have seen many families, campers, fishermen, river floaters, hunters and others enjoying the area around the bridge. We particularly wish and hope that the area within just a few hundred feet of the bridge, including removal of the trees in the river, could be restored to the same level of attractiveness and usefulness that so many people have enjoyed over the years. We believe that the down timber can and should be salvaged in the entire blowdown area and made into useful products. Also, however relatively small this project is, in difficult economic times every little bit of employment is helpful.</p> <p>We appreciate your consideration of these thoughts and suggestions.</p> <p>Mary and Jim Appelt</p>	<p>← 1</p> <p>← 2</p> <p>← 3</p> <p>← 4</p>	<p>Thank you for your comments on this project.</p> <p>We're glad that the Swan Ecosystem Center was able to assist you with your cleanup.</p> <p>We believe also that salvaging the blown down trees in Units 24 and 25 will provide for recovery of merchantable timber and provide wood products for local economies in the area.</p> <p>Under the Selected Alternative, trees located in the river will not be removed. Down trees in rivers provide crucial habitat for fish, wildlife, and aquatic insects. While down trees are not always attractive, they have ecological value. The Flathead National Forest normally does not remove trees from the river but made an exception for about a half dozen trees that were immediately upstream of the Piper Creek Bridge and threatened the bridge integrity. The Selected Alternative will salvage harvest those trees and provide an economic return. In addition the salvage will remove the down trees from the boat launch area on the east side of the bridge.</p>

Hemlock Elk Fuels Reduction and Forest Health Decision Notice
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BB-2. Meyer	Comment #	Response
<div style="display: flex; justify-content: space-between; align-items: center;">  <div style="text-align: center;"> <p>FLATHEAD NATIONAL FOREST Swan Lake Ranger District</p> </div>  </div> <p style="text-align: center;"><u>Public Contact Record</u></p> <p>PROJECT PROPOSAL: Mid Swan Salvage Project</p> <p>Occasion for Contact: Phone Call <input checked="" type="checkbox"/> Other</p> <p>Name and Address: Neil Meyer - Condon, MT</p> <p>Phone</p> <p>Who Initiated Contact: Neil</p> <p>Contact Recorded By: Keith Konen Date: 2/17/09</p> <p>This morning I received a call from Neil Meyer relating to the Mid-Swan Blowdown Project. Neil had received a copy of the EA and wanted to make a few comments. I mentioned to Neil that the comment period was open until March 18th and that Steve Brady would be reviewing public comments and taking them into consideration when making his decision. Neil wanted to express his support for Alternative B. He said that it seemed most consistent with what we looked at and discussed on the Field Trips and also that it would salvage the most timber. Neil also asked not to receive a full copy of the EA, as it seemed large and similar to a "Sears and Roebuck Catalog". Neil asked for a brief summary document instead.</p> <p>Keith Konen – Silviculturist/TMA</p>	←1	<p>Thank you for your comments on this project. The Selected Alternative is a combination of Alternatives B, C, and D. Alternative B was not selected in its entirety as the alternative for implementation due to the resource concerns of salvaging down trees within old growth units and the potential impact to bull trout habitat within the floodplains of three units.</p> <p>Units 1, 3, 9, 10, 11, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24, and 25 from Alternative B will be retained in the Selected Alternative. These units will recover merchantable wind-damaged timber from the suitable timber base, reduce fuels, and improve forest health without causing significant offsetting impacts. Units 2, 5, 13, and 18 will be deferred due to the resource issues of removing blown down trees in old growth stands. The portions of Units 4, 6, and 8 located in the floodplain of Lion Creek will also be deferred from the Selected Alternative due to the potential impacts to bull trout habitat.</p>

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BB-3. Montgomery, Friends of the Wild Swan	Comment #	Response
<p><i>Friends of the Wild Swan</i> <i>P.O. Box 5103</i> <i>Swan Lake, MT 5991</i></p> <p>March 17, 2009</p> <p>Swan Lake Ranger District 200 Ranger Station Road Bigfork, MT 59911 Attn: Steve Brady</p> <p>Dear Steve,</p> <p>Please accept the following comments on the Mid Swan Blowdown Salvage Environmental Assessment on behalf of Friends of the Wild Swan and Swan View Coalition. We think it is good that you developed alternatives to address the old-growth forest and riparian/fisheries issues.</p> <p>Economics The economics analysis is not accurate and does not analyze current market conditions. The timber industry outlook focuses on outdated data. Only one sentence on page 3-278 recognizes the current state of the economy: "Log prices continued to drop dramatically in 2008 based on the Western Wood Products Association Lumber Price Index published in December 2008."</p> <p>The EA paints a rosier picture than current conditions warrant. The national and global economies are in trouble, the housing industry has collapsed, demand for wood has dropped, mills are curtailing operations and timber prices are the lowest they have been in decades. Timber availability is not a big issue at this time. So again we question whether salvage logging when the market is down is a fiscally sound decision. Is it worth the ecological damage?</p>	<p>← 1</p> <p>← 2</p>	<p>Thank you for your comments on this project.</p> <p>The economic analysis used the data that was current at the time of the analysis; however, since that analysis the lumber market conditions have further deteriorated. The primary purpose of the market analysis is to compare the economic trade-offs of various alternatives.</p> <p>Local jobs and income were also analyzed in the Mid Swan Economic Analysis. The coefficients used for this analysis were derived by the University of Montana's Bureau of Business and Economic Research.</p> <p>The EA also discusses current economic conditions as displayed on page 3-278. Salvage logging when the wood has not seriously deteriorated is a sound policy. Delay of the sale of wood that is blown down until market conditions improve may or may not find better market conditions; but delay in harvest almost surely will result in intrinsically less valuable wood due to deterioration no matter what the condition of the market. In times of low market conditions, mills actively seek wood which may potentially be purchased at lower rates to keep mills in production and workers at their jobs. As disclosed throughout the Environmental Analysis, the negative environmental effects of the salvage logging, are minimal and the final decision goes even further to insure that the harvest results in very little ecological damage.</p>

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<p>Wildlife Units 13 and 26 are in lynx critical habitat. Alternative C does not log in Unit 13 because it meets the Green et al definition of old-growth habitat. However, Unit 26 also provides high quality denning habitat as a result of the increase in down trees from the blowdown event. Salvage logging will reduce the quality of denning habitat resulting in adverse modification to critical habitat. Unit 26 also contains water howellia ponds. We do not believe that Unit 13 and Unit 26 should be salvage logged.</p>	<p>← 5</p>	<p>The Selected Alternative does not include treatment of Unit 13. No salvage of blown down trees will occur in Unit 13.</p> <p>As described in the EA (page 3-168), the forested land where Unit 26 is proposed did not provide lynx denning habitat characteristics prior to the wind event and subsequent blowdown. The wildlife analysis in the EA discloses that “the addition of down woody material improved denning habitat characteristics.” This does not mean that the area where Unit 26 is proposed is ‘high quality denning habitat’, as you suggested. It is an acknowledgement that the addition of down woody material would move the condition of those acres from being non-denning habitat to being “potential lynx denning habitat,” as described in the analysis. In summary, the acreage where Unit 26 is proposed was not high quality denning habitat for lynx <i>prior</i> to the wind event, it is not high quality denning habitat <i>after</i> the wind event, and it would not be high quality denning habitat <i>following</i> blowdown salvage. Although it is unlikely in Unit 26 that the habitat would be considered <u>high quality</u> denning habitat following salvage operations, the Design Criteria for retaining down woody material may still provide potential denning habitat for lynx; this would depend on the juxtaposition of the material retained and other characteristics of the down logs.</p> <p>Unit 26 is 27 acres in the Selected Alternative. Approximately 221 acres in Section 18, where Unit 26 is located, presently provide lynx denning habitat, will not be treated, and will continue to provide lynx denning habitat. Some of this acreage (approximately 100 acres) is high quality denning habitat because it includes old growth forest stands and other forest stands with a significant large tree component and down woody debris. Potential denning habitat for lynx is not limited in this area.</p> <p>The comment was made that reducing the quality of denning habitat would result in adverse modification to critical habitat. This is not accurate. Activities that may destroy or adversely modify lynx critical habitat are those that would alter the physical and biological features to an extent that appreciably reduces the conservation value of critical habitat for lynx. Activities that may adversely affect critical habitat may be those actions that: (1) reduce or remove understory vegetation within boreal forest stands; (2) actions that cause permanent loss or conversion of the boreal forest; and (3) actions that increase traffic volume and speed</p>

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<p>Old-growth forest habitat is pretty scarce and fragmented in the project area so every effort should be made not to impact existing old-growth habitat, to allow stands to progress towards old-growth forest both in age as well as attributes, and to ensure that stands are connected.</p> <p>Units 6 and 11 were classified as old-growth prior to the blowdown. While these units may not have as many large, live trees to meet the Green definition, we assume that other attributes are still present that are beneficial to wildlife. Also Unit 6 is in Tumble and Trickle Creeks. As stated in our scoping</p>	<p style="text-align: center;">← 6</p> <p style="text-align: center;">← 7</p>	<p>on roads that divide critical habitat. The effect from blowdown salvage on Unit 26 is not likely to adversely affect lynx critical habitat. The proposed activities will reduce the amount of down woody material on approximately 27 acres of lynx habitat, but the action does not significantly reduce or remove understory vegetation within boreal forest stands, cause <u>permanent</u> loss or conversion of the boreal forest, or increase traffic volume and speed on roads that divide critical habitat. Treatment of Unit 26 will continue to provide habitat to support a viable population of lynx by retaining the ability of the Primary Constituent Element (the physical and biological features that are essential to the conservation of the species) to be functionally established. The USFWS agreed with this assessment in their concurrence letter dated April 2, 2009.</p> <p>Unit 26 is located more than 300 feet from the Howellia pond you describe. Project specific surveys within the Mid Swan Project Area were conducted in August 2008. The Forest Botanist's determination displayed in the BA found that the project may affect, but it is not likely to adversely affect water howellia. The USFWS concurred with this determination dated April 2, 2009 (Project File Exhibit E-1).</p> <p>Occupied ponds will be buffered 300 feet. Any plants species observed during sale activity will be given the protective measures as afforded by the timber sale contract clause CT6.251.</p> <p>A concerted effort was made during project design for the Mid Swan Blowdown Salvage Project to have minimal impacts on old growth habitat, to retain and promote forest conditions that are on a trajectory toward providing future old growth habitat, and to ensure connectivity of old growth habitats.</p> <p>Under the Selected Alternative, no salvage of blown down trees will occur within old growth stands. Treatments in old growth stands were dropped for the reasons discussed in the rationale for the decision.</p> <p>Unit 11 is made up of portions of nine different forest stands. Of the total acreage in Unit 11 (177 acres), only a portion of one stand, 36 acres, was providing old growth habitat prior to the wind event. In Unit 11, there are 141 acres of proposed blowdown salvage in stands that were not old growth prior to the wind event. In other words, most of Unit 11 (80</p>

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<p>comments we have concerns about the logistics of pulling the trees out with a cable that allows one end to drag on the ground and also clearing for a landing. Once down in the bottom of this unit the soils were wet and could be easily damaged. There also did not appear to be more than one layer of down trees in the bottom so dragging trees would damage the sensitive wetland-type soils.</p>		<p>percent) was never old growth habitat. In the forest stand that was old growth prior to the wind event, it was the largest trees that blew over. The forest stand continues to supply wildlife habitat for many species, but the unique habitat characteristics that old growth forest provides are absent now. Exams were done specifically in this area for this project to see if the portion of the stand retained old growth characteristics, but the results showed it does not. It should be noted however, that in this stand there is a good component of 16 to 18 inch trees, and some 20 inch trees that will provide future old growth habitat. The salvage of blowdown and inter-planting of ponderosa pine will not disturb the trajectory of the stand toward future old growth but will actually speed the progress towards this condition.</p> <p>The forest stand where Unit 6 is proposed provided old growth habitat for wildlife species prior to the wind event. This forest stand also met the Green et al. description of an old growth stand, in reference to the amount of large diameter trees, the age of the trees, and the range of snag and down woody habitat available. Following the wind event, and the subsequent blowdown of trees in this forest stand, there has been a loss of old growth habitat. Virtually <u>all</u> of the large tree component is now lying on the ground; there is no forest cover. There is a down woody component for down woody associated species, but this area does not provide old growth habitat at this time. It is expected that old growth associated species will relocate to adjacent areas that still provide old growth forest habitat conditions. Following the proposed treatment, there would still be ample down woody habitat available; only the upper bench and hillside of Unit 6 will have blown down trees removed. In addition, where salvage occurs, down woody material will be retained.</p> <p>As described above, under the Selected Alternative, only the upper bench and hillside of Unit 6 will have blown down trees removed with the lower portion of the unit where you expressed concern relative to moist conditions dropped. Unit 11 is included in the Selected Alternative and will have salvage treatments.</p>

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<p>Units 3, 6, 15, 16 and 19 are adjacent to old-growth. Unit 16 contains water howellia ponds. Unit 3 has a skid trail across a wetland. To avoid displacement to old-growth associated wildlife and impacts to wetlands and ponds we suggest these stands be dropped.</p>	<p>←8</p>	<p>The potential for displacement of old growth associated wildlife species is greatest when activities are actually occurring in an old growth forest stand. The Selected Alternative does not include any blowdown salvage within existing old growth habitat, so potential displacement of old growth associated species is low. In addition, Design Criteria that limits management activities to periods outside of the important spring period (April 1 through June 15) will decrease the chance for negative effects and provide more security where proposed blowdown salvage occurs adjacent to old growth habitats.</p> <p>As described in the EA (page 3-197), any displacement would be short-term, one year or less. This would not be significant to old growth associated species, especially considering that the disturbance is outside of old growth habitats and not during the important breeding season.</p> <p>Unit 3, a small portion of Unit 6, and Units 15, 16, and 19 are included in the Selected Alternative and are proposed for salvage treatment. As stated above, the portion of Unit 6 located in the floodplain was dropped due to the potential impacts to bull trout.</p> <p>No impacts to wetlands will occur with the implementation of Unit 16. Unit 16 does not contain a howellia pond. There is an occupied pond located on private land, in Section 16, T22N, R17W within 200 feet of proposed Unit 16. Occupied ponds will be buffered 300 feet. Any plant species observed during sale activity will be given the protective measures as afforded by the Timber Sale Contract Clause CT6.251. The Forest Botanist’s determination displayed in the BA found that the project may affect, but it is not likely to adversely affect water howellia. The USFWS concurred with this determination dated April 2, 2009 (Project File Exhibit E-1).</p> <p>In Unit 3, Design Criteria (Appendix 2 of this document) has been identified by the Fish Biologist and Soil Scientist where the skid trail crossing would be designated on the ground and occur during dry soil conditions to protect resources. These dry soil conditions would be defined by the Soil Scientist.</p>

