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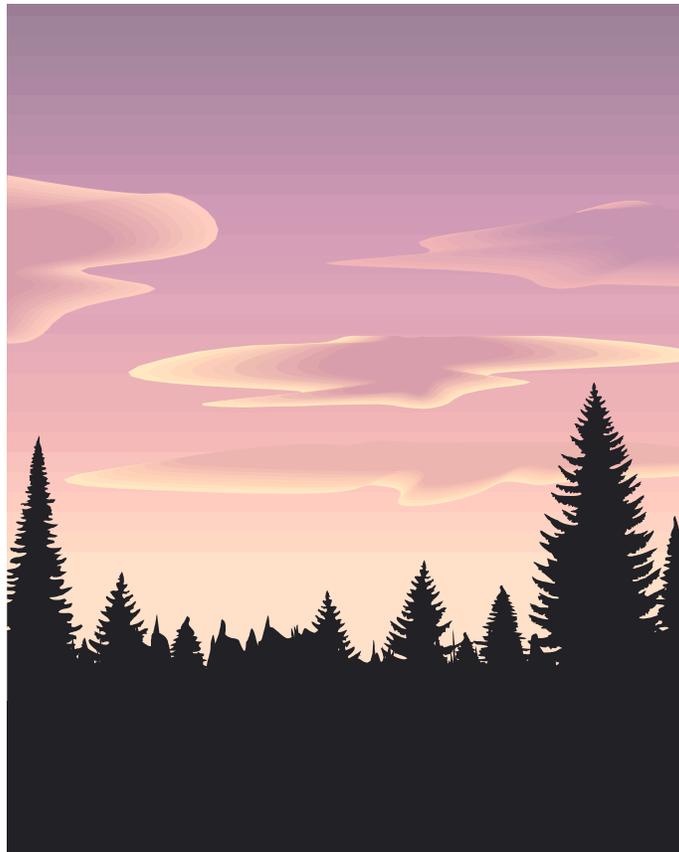
October 2006



# Decision Notice and Finding of No Significant Impact

## Valley Face Fuels Reduction Project

Flathead National Forest  
Tally Lake Ranger District  
Flathead County, Montana



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## Summary

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This Decision Notice (DN) documents my decision to select the Preferred Alternative (C), with some modifications, from the Valley Face Fuels Reduction Project Environmental Assessment (EA) for implementation. This document includes a discussion of my rationale for choosing Alternative C, and the Finding of No Significant Impact (FONSI) that allowed me to choose an EA as the appropriate level of analysis.

I have decided to allow commercial and non-commercial vegetation treatment methods to reduce the hazardous fuel loading and improve forest health conditions on approximately 3,242 acres on National Forest System (NFS) lands. I have also decided to allow construction of approximately

3.1 miles of temporary road which would provide access to units. Temporary roads would be reclaimed following the vegetation treatments. Best Management Practices (BMPs) will be applied to approximately 40 miles of existing NFS roads. Activities associated with implementation of the fuel reduction treatments will yield approximately 11 million board feet (MMBF) of forest products. More specific detail about this decision is contained in the “Decision” and “Appendix A - Selected Alternative Description” sections of this DN.

This project was conducted under the authorities defined in the Healthy Forests Restoration Act (HFRA) of 2003, Section 101(2). It was subject to a Predecisional Administrative Review Process (referred to as the “objection process”) pursuant to 36 CFR 218, subpart A. It was not subject to notice, comment, and appeal provisions pursuant to 36 CFR 215.

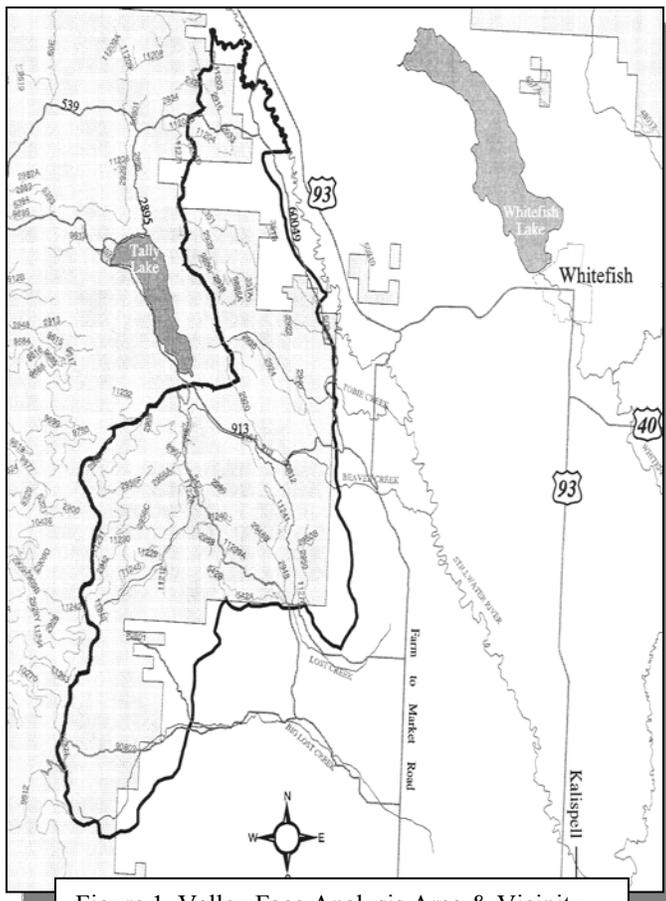


Figure 1. Valley Face Analysis Area & Vicinity

The objection period ended on September 11, 2006. Four objections were received and considered by the interdisciplinary team (IDT) and staff from the Flathead National Forest and the Northern Region office. The objection letters and Forest Service responses to the objections are in Appendix C of this DN.

My decision is based on the information contained in the Valley Face Fuels Reduction Project EA, the supporting information in the Project Record Exhibits, and on comments received from the public and other agencies through the National Environmental Policy Act (NEPA) scoping and comment process and the HFRA 30-day objection period.

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## ***Project Area***

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The Valley Face Project area generally includes the east-facing slopes of the Salish Mountains that form the western boundary of the Flathead Valley (see Figure 1). The project area extends approximately from the Round Meadows Recreation Area in the north to the top of the Lost Creek divide above Ashley Lake in the south. The Logan Creek watershed divide is the western boundary of the project area and the valley floor is generally the extent of NFS lands on the east.

Kalispell and Whitefish are the closest incorporated communities, but rural residential development lies along and within the entire analysis area. While the northern and eastern boundaries of the Flathead Valley are defined by steep mountain ranges, the Salish Mountains on the western boundary are more gradual and rolling, with few peaks above 5,000 feet. This less dramatic terrain has in large part determined the historical and current use and development of the area. Whereas relatively little private land exists in the more precipitous mountains around the valley, there are numerous private land holdings in the Salish Mountains, including many within the Valley Face Project area.

The Valley Face Project area is entirely located in Flathead County. The area is managed by the Tally Lake Ranger District, headquartered in Whitefish. The analysis area is located in T29N, R22W, Sec. 6; T29N, R23W, Sec. 1-10, 16-21, 29-30; T29N, R24W, Sec. 1, 12, 13, 24; T30N, R22W, Sec. 7, 18, 19, 30, 31; T30N, R23W, Sec. 1-4, 8-36; T30N, R24W, Sec. 24, 36; and T31N, R23W, Sec. 3, 4, 9-11, 14-16, 21-23, 25-28, 33-36. A map of the analysis area with prominent landscape features, such as roads and streams, is shown in Figure A-1. Activities described in this decision are only for implementation on NFS land.

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## ***Background***

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Following the 2000 fire season, Congress directed the Forest Service to identify high-risk wildland/urban interface areas, using the 2000 National Fire Plan ([www.fireplan.gov](http://www.fireplan.gov)) Guidelines. The communities of the Flathead Valley have been identified as “communities at risk” from wildland fire.

On August 22, 2002, President Bush established the Healthy Forests Initiative (HFI), directing the Departments of Agriculture and the Interior, and the Council on Environmental Quality, to improve regulatory processes to ensure more timely decisions, greater efficiency, and better results in reducing the risk of catastrophic wildland fires. The Healthy Forests Restoration Act (HFRA) of 2003 (P.L. 108-148) contains a variety of provisions to expedite hazardous-fuel reduction and forest-restoration projects on specific types of federal land that are at risk of wildland fire or insect and disease epidemics. The Act helps rural communities, states, tribes, and landowners restore healthy forest and rangeland conditions on their lands.

Recently, an Interdisciplinary (ID) Team comprised of Forest Service natural resource specialists, in cooperation with members of the public, local fire departments, and other agencies, have worked to identify areas in the wildland-urban interface that could benefit from fuel reduction and forest health projects. The Valley Face Project area was identified as such an area. This proposal is consistent with and would implement fuels reduction treatments recommended in the *Flathead*

*County Community Wildfire Fuels Reduction /Mitigation Plan (FCWP)* (Exhibit U-2). This plan identified the project area as an area with a high risk of catastrophic wildland fire. This plan also highlighted the need to provide for firefighter and public safety in the area. Information provided in the *Summary of Findings from the Ecosystem Analysis at the Watershed Scale (EAWS)* (Exhibit U-3) contributed to the assessment and analysis of the existing condition in the project area.

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### ***Purpose and Need***

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The ID Team, in collaboration with other agencies, organizations, and individual members of the public, designed this project to address two concerns that are applicable to the Valley Face area:

- Reduce hazardous fuel to varying degrees across the landscape. Create and expand fuel reduction zones throughout the landscape to enhance fire suppression control efforts by reducing fire intensity.
- Reduce the vulnerability of the forest to large scale, dramatic disturbances from insects, diseases, or unwanted wildland fire, both on a stand basis and across the landscape.

The need for these actions is based upon present fuels and stand conditions in the project area, both on private and public land, and the ongoing residential use and development in the Valley Face Fuel Reduction Project area.

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### ***Public Involvement and Collaboration***

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The development of the Valley Face Fuels Reduction Project has been consistent with the collaborative approach recommended in the HFRA (Exhibit U-1). Collaboration is described as a framework in “A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment: 10-Year Comprehensive Strategy Implementation Plan” (Exhibit U-4). The intent of this collaborative framework is to “improve cooperation and communication among all parties at national, regional, and local levels acknowledging that key project planning decisions should be made after collaboration at the local level.”

The Flathead National Forest has undertaken collaborative efforts beginning in 2001 with various state and Federal agencies (e.g. Montana DNRC, National Park Service) as well as other partners to implement the National Fire Plan. The focus of these efforts was how to best collaborate on reducing risk to communities through fire prevention, staffing, preparedness, wildland-urban interface fuel reduction projects, and grant opportunities. Beginning in the summer of 2004, the Flathead National Forest participated in the development of the FCWP (Exhibit U-2), a Community Wildfire Protection Plan (CWPP) as outlined in the Healthy Forest Restoration Act.

After the FCWP and Valley Face EAWS recommended several management actions, a public involvement strategy was developed to ensure that potentially interested members of the public and other government agencies received timely information about the upcoming analysis so they could

collaborate in the process (Project Record Exhibit B-1). Complete details of the public involvement process can be found in the EA and the Project Record Exhibit sets B, C, and D; the elements of the process are summarized below:

- SOPA: the Valley Face Fuels Reduction Project has been listed on the Flathead National Forest Schedule of Proposed Actions (SOPA) since July 1, 2005.
- Public mailings: several letters describing the project during the planning phase were mailed to interested members of the public, area landowners, and other agencies and organizations.
- Collaborative public meetings: a series of open houses and field trips were conducted to update interested members of the public on the status of the project and to solicit suggestions for project modifications.
- Collaborative individual meetings: members of the ID Team met individually with members of the public throughout the planning process to discuss issues related to proposed actions.
- Local Media: a series of legal notices and news releases have been published in area newspapers describing proposed activities and comment/collaboration opportunities. Articles following the release of the EA appeared in three different Flathead Valley newspapers.
- Content analysis: Comments generated from the Forest Service's request for comments on the proposed action were analyzed to capture the full range of public viewpoints and concerns, information used to identify issues associated with the project.

A list of collaborating agencies, groups, and individuals consulted throughout the entire public participation process is in Chapter 4 of the EA. Participation with the Salish and Kootenai Tribe was conducted during quarterly meetings between tribal representatives and the Flathead National Forest Heritage Resource specialists.

Copies of the EA were sent to those individuals or groups who responded to our recent invitation to receive a copy. A legal notice appeared in the Daily Inter Lake informing the public of the availability of the EA and the methods available to acquire a copy.

A thirty day Objection Period, as defined in HFRA, began following publication of the EA on August 11, 2006, and concluded on September 11, 2006. Regional Forester Gail Kimball received four objections to the project. No objector requested a collaborative resolution meeting with the Forest Service.

The objection documents were subjected to a content analysis process as described above, and "objection points" were identified and compiled in a separate document. These objection points were considered by the relevant resource specialists and administrators on the Flathead National Forest and in the Regional Office. The Selected Alternative (Alternative C) was slightly modified

in response to issues raised in the objections; the details of the changes are described below in the Decision section of this document.

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## *Issues*

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To identify issues specific to the Valley Face project, my staff studied public comments and information about historic and current conditions within the analysis area. They also reviewed the Flathead National Forest Plan and other site-specific planning documents relevant to the Valley Face area to further develop a list of issues. The individual specialists also determined quantifiable “issue indicators” to measure how each alternative responded to the significant issues. I considered the potential project effects on the various issue indicators to help inform my decision regarding which of the three alternatives to select.

The following issues were determined to be significant and within the scope of the project decision. These issues were addressed through the development of the Selected Alternative.

**Issue 1: Old Growth Forest:** There was concern that stand-regeneration next to old growth timber stands would create an “edge effect.” This would reduce the value of the old growth habitat to old growth-associated wildlife. There also was concern that understory fuel reduction work (hand piling slash) in old growth would not fully maintain habitat values for old-growth dependent species.

*Issue Indicators:* Acres of understory fuel reduction in old growth habitat and acres of old growth habitat with new abrupt edge.

**Issue 2: Forested Wildlife Habitat:** There was concern that several units would negatively impact wildlife species using mature forests, such as Canada lynx and northern goshawk, and important white-tailed deer winter habitat.

*Issue Indicators:* Acres of potential lynx denning habitat proposed for seed tree or shelterwood treatment, acres of potential goshawk nesting habitat proposed for seed tree or shelterwood treatment, and acres of loss of important white-tailed deer winter thermal cover.

**Issue 3: Soils:** There was concern that past timber harvest activity in some areas proposed for treatment had resulted in levels of soil disturbance that remained too high to allow additional use of mechanized equipment.

*Issue Indicator:* Units at risk of exceeding fifteen percent detrimental soil disturbance through treatment.

**Issue 4: Aesthetics/Visuals:** There was concern that certain units or prescriptions would negatively impact the appearance and/or enjoyment of the forest for members of the public that live or recreate in the area. Areas proposed for vegetation treatment in which low and moderate amounts of trees are retained typically have a higher visual impact than vegetation treatments with high retention levels. See EA Table 2-1 for a discussion of retention levels.

*Issue Indicator:* Acres of vegetation treatments proposed for low or moderate retention and acres proposed for high retention at or along established viewpoints.

**Issue 5: Tree Retention Levels:** There was concern that the level of fuels reduction proposed was excessive. Some commenters felt that proposed retention levels did not leave enough trees within some units.

*Issue Indicator:* Acres of vegetation treatment by low, moderate, and high retention levels.

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## *Decision*

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As the Responsible Official for the Flathead National Forest, I have decided to implement the Preferred Alternative (Alternative C, hereafter the “Selected Alternative”) from the Valley Face Fuels Reduction Project EA for implementation. I have made the following modifications to the Selected Alternative based upon additional analysis and comments received following release of the EA:

- Unit 32 (27 acres) and a portion of Unit 31 (99 acres) were eliminated to protect northern goshawk habitat. Within what was formally Unit 31, a new unit was created along the private boundary, designated Unit 413 (18 acres), which treats only the understory fuels and maintains goshawk habitat.
- A small portion (four acres) of Unit 27 was eliminated to maintain an area of large-tree wildlife habitat.
- Due to the elimination of a portion of Unit 31, temporary road 9 as described in the EA is no longer needed.

Appendix A of this Decision Notice provides a detailed description of the features and design criteria of the Selected Alternative; I have summarized these below.

The Selected Alternative will respond to the purpose and need for the project by treating fuels and improving timber stand health on 3,242 acres of NFS lands. Mechanized treatments including regeneration harvest and commercial thinning would be applied to 2,095 acres in 45 individual units. Non-commercial fuel reduction activities would be applied by hand on 1,147 acres in 25 units. Slash would be piled and burned in most treatment units; underburning and jackpot burning methods would be employed to treat slash in nine units.

This alternative was developed to respond to the significant issues identified following the scoping of the proposed action. In particular, the Selected Alternative modifies the proposed action in response to concerns with the effects on wildlife habitat and soil productivity. Public concern with the level of retention and/or visual impacts in several units also affected the design of this alternative. Unit boundaries were pulled back around most identified old growth stands to reduce effects around the edges of the old growth. The hand treatment units proposed in late seral stands in Alternative B were dropped from the Selected Alternative. Several units were modified or dropped to address soil productivity and visual concerns. Unit 500 would receive 75 acres of non-commercial treatment to reduce fuels and improve wildlife habitat.

No new permanent system roads would be constructed. A total of 39.2 miles of roads would have BMPs applied. Eight temporary road segments totaling 3.1 miles would be required to access some of the units; these temporary roads would be rehabilitated following their use. Five unauthorized roads totaling 1.3 miles that currently exist on the landscape would be used for access and then rehabilitated afterwards.

Fuel reduction activities would be carried out beginning in 2007 and continuing approximately five years. Timber harvest, fuel reduction activities, and temporary road construction/rehabilitation would not occur in important big game winter range between December 1 and April 15 so as not to compromise big game security. Between April 15 and July 31, timber harvest and fuel reduction would not occur in Unit 409 or in Unit 30B, in order to avoid disturbance to nesting loons on Bootjack Lake.

During project implementation, logging, site preparation, and road reclamation equipment used in the area would be washed to remove weed seeds. A Forest-wide environmental analysis (Flathead National Forest Noxious and Invasive Weed Control Decision Notice and Finding of No Significant Impact, May 2001) set priorities and parameters for noxious weed control. Weed treatments in the analysis area would be consistent with this strategy.

To minimize erosion and other detrimental impacts to the soil resource, all road construction, reconstruction, and timber harvest would be completed using Best Management Practices (BMPs) or Soil and Water Conservation Practices (SWCPs). The practices are described in detail in the Forest Service Soil and Water Conservation Handbook (FSH 2509.22), the Soil Management Handbook (FSH 2509.18), and the Flathead Forest Plan (pages II: 49-55) (Exhibit H-21). In order to conserve soil nutrients, treatment of slash in seed tree and shelterwood units would be delayed until after one wet season following harvest except where doing so would create an unacceptable wildland fire risk.

This decision also requires monitoring during and after project implementation to ensure compliance with all design criteria and determine the adequacy and effectiveness of mitigation measures. The monitoring for the Valley Face Fuels Reduction Project would include oversight of project effects on soils, vegetation, water, wildlife, fisheries, and roads. The monitoring required by my decision is described in detail in Appendix B.

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### ***Other Alternatives Considered***

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#### **Alternatives Considered in Detail**

In addition to the Selected Alternative, I also considered in detail two additional alternatives; the No Action Alternative and Alternative B, the Proposed Action. Detailed descriptions of these additional alternatives can be found in Chapter 2 of the EA; they are briefly summarized below.

#### **Alternative A: The No Action Alternative**

Under the no action alternative, no activities would occur within the Valley Face area as part of this project. Current management not related to the Valley Face Fuels Reduction Project would

continue on NFS lands within the project area. I did not choose this alternative because I believe the purpose and need as identified in this project reflects important management concerns that should not be ignored in order to restore forest health and protect residents and firefighters in the event of wildland fire. Benefits to other resources, including water quality and fish population connectivity, would also be foregone if I had chosen Alternative A.

#### Alternative B: The Proposed Action

I did not choose to implement Alternative B, which, while responsive to the Purpose and Need for the project, also raised concerns with members of the public regarding issues such as tree retention levels, wildlife security, and soil productivity, among others. Alternative C was then developed as the Preferred Alternative to address these concerns to the maximum extent possible while still meeting the Purpose and Need. These issues are discussed in greater detail below.

The Proposed Action would have treated 870 more acres with commercial treatments, and 200 fewer acres with non-commercial treatments than the Selected Alternative. Several units proposed for commercial treatments in Alternative B were dropped or modified in the Selected Alternative in response to comments received from the public or following additional analysis by resource specialists on my staff. Unit changes between the two action alternatives were focused on addressing concerns such as wildlife habitat connectivity, soil productivity, and the visual impact of proposed treatments on nearby private property owners.

The table on the following page compares the features of the alternatives.

#### **Alternatives Considered But Eliminated From Detailed Study**

In addition to the three alternatives described above, I also considered two additional alternatives suggested by members of the public during collaboration, but chose not to analyze them in detail for the reasons discussed below.

*Home Ignition Zone Alternative:* Several commenters suggested we only treat fuels in forest stands located within a few hundred yards of homes. While many of the units in the Selected Alternative are in close proximity to homes, other units are more distant but still within the Wildland/Urban Interface as identified in the FCWP. These units respond to the Purpose and Need for the project by reducing the vulnerability of the forest to large scale, dramatic disturbances from insects, diseases, or unwanted wildland fire, both on a stand basis and across the landscape.

*Fuel Reduction Adjacent to Industrial Timber Lands:* Several commenters requested that the project include the creation of fuel breaks along the boundary between NFS lands and lands belonging to private timber companies. Several units included in the Selected Alternative would partially address this issue, but it was determined that many of the stands affected by this approach are currently classified as old growth and fuel reduction treatments to effectively change wildland fire behavior in these areas would not allow them to remain classified as old growth. Forest Plan standards and HFRA require the maintenance of existing old growth areas.

**Table 1. Summary of the Features of the Alternatives.**

<b>Feature</b>	<b>Alternative A No Action</b>	<b>Alternative B Proposed Action</b>	<b>Alternative C (Preferred)</b>	<b>Alternative C (Selected)</b>
Temporary road construction	0	4.5 miles	3.5 miles	3.1 miles
Temporary road reconstruction of low-grade roads	0	1.4 miles	1.3 miles	1.3 miles
Road rehabilitation (BMPs)	0	40 miles	40 miles	39 miles
Timber volume estimate in million board feet	0	15	12	11
Total timber harvest acres	0	2965	2225	2095
- Seed tree	0	196	188	188
- Shelterwood	0	1614	1218	1115
- Commercial thin - moderate retention	0	836	560	560
- Commercial thin - high retention	0	104	259	232
- Patch thinning	0	215	0	0
Fuel reduction acres without timber harvest	0	947	1129	1147
- Precommercial thinning	0	437	437	437
- Understory fuel reduction	0	276	349	367
- Understory fuel reduction in old growth stands	0	106	0	0
- Down fuel reduction	0	128	128	128
- Patch thinning	0	0	215	215
Total Acres of Fuel Reduction	0	3912	3354	3242

## ***Rationale for the Decision***

My criteria for making a decision on this project was based on how well the management actions analyzed in the EA address the purpose and need of the project, and consider the issues that were raised during the initial scoping process, the comment period, and other collaborative phases of project development. The *Finding of No Significant Impact* detailed below supported the use of an EA as the appropriate level of NEPA analysis. I considered Forest Plan standards and guidance for the project area, and took into account competing interests and values of the public.

### **Meeting the Purpose and Need**

Following several severe wildland fire seasons, the Secretaries of Agriculture and Interior developed an interagency approach to respond to severe wildland fires, reduce their impacts on rural communities, and assure sufficient firefighting capacity in the future. Hazardous fuel reduction is one of the key points of this interagency approach, also known as the National Fire

Plan. This part of the plan emphasized management in overly dense forest vegetation that is the result of decades of fire exclusion, particularly within wildland/urban interface areas. The fuel reduction treatments involved in the Selected Alternative address these resource conditions very clearly.

The purpose and need for action and desired conditions for the Valley Face area are based on Forest Plan goals, objectives, and standards. Both action alternatives respond in various ways to the purpose and need for action, but I believe the Selected Alternative, as modified in this decision, best meets the purpose and need for the Valley Face Project while also being responsive to the issues identified through collaboration with members of the community. I believe the treatments will substantially lessen the risk of a future high severity crown fire in the area. Future fire suppression efforts should be more effective and safer for firefighters.

The basic premise of this project was to reduce the effects that a future wildland fire may have on property and resource values, and provide better assurance that human life would be protected within and near the project area. The Valley Face area was selected for a fuel reduction project because the rapid growth in the Flathead Valley has resulted in a substantial increase in the number of people living in close proximity to NFS lands along and within the Salish Mountains. Most of the residential development is concentrated along the eastern boundary of the forest, directly in the west-to-east path historically traveled by wildland fire in the project area.

I have been very pleased with our collaboration with the residents of the area. They have provided us information about resource conditions and commonly used areas within the project area, and many have indicated their willingness to allow us use of their lands to help facilitate fuel reduction treatments on National Forest System lands.

Another reason the Valley Face area was selected for a proposed fuel reduction project was because of the existing forest stand and fuel hazard conditions. We knew from past analyses (Good Creek Resource Management Project, Logan Creek Ecosystem Restoration Project, Valley Face Ecosystem Analysis at a Watershed Scale) that forest stands in the project area and throughout the Salish Mountains often have higher tree densities in multiple canopy layers than what commonly existed historically, primarily due to fire exclusion over the last century. Insects and disease have led to substantial mortality and greater fire hazard in many areas of the forest. These stand and fuel conditions increase the risk that fires will move from the forest floor to tree crowns, making fire suppression an almost impossible task. The threat to life and property from high forest fuel hazards has unfortunately been illustrated once again during the 2006 fire season in Montana and other western states.

My decision will reduce fuel levels on 3,242 acres. Some of the trees will be removed for commercial uses while the leftover branches, foliage, and smaller-sized tree boles will be burned or otherwise treated. Trees will be removed that most contribute to ladder fuels and continuous forest canopy cover; the largest trees of more fire-tolerant species will not be removed. Ladder fuels provide an avenue for a fire to move from the ground to the forest canopy. Once a fire gets into a dense forest canopy it is capable of spreading rapidly through the tree tops if high-risk weather patterns develop. Crown fires also tend to cause spotting and firebrands ahead of the main fire, increasing the ignition risk to downwind structures.

I am aware of the research conducted by Jack Cohen concerning reducing wildland fire threats to homes in the urban interface area. The EA discusses implications of this report on page 107 and in the Response to Comments document (Exhibit C-119 in the Project Record). I believe that the actions I am authorizing with this decision, coupled with fuel reduction and other efforts in the vicinity of homes, will reduce potential fire intensities, improve the opportunity for fire suppression, and lessen the potential for fires on federal land to ignite private structures. In addition to reducing fire effects, I believe my decision will create more sustainable forest conditions by improving overall stand health. Growing space, individual tree vigor, and the ability to withstand pests and pathogens should be improved in the treated forest stands. Likewise, better opportunities for ponderosa pine and western larch regeneration should result from the creation of more open stand conditions.

I did not select Alternative B although it would have reduced fuels on more acres than the Selected Alternative because of its potential effect on the issues identified above in this Decision Notice. As the decision maker on the Valley Face Fuels Reduction Project, I had to weigh all potential benefits of the various alternatives against their possible impacts, and consider the suggestions and concerns of the public.

I did not select the No Action Alternative because this alternative would not address the threat posed to people and property of a severe crown fire occurring in the Valley Face area. If I chose Alternative A, I would be ignoring valuable input I received through collaboration with the community and the recommendations of the *Flathead County Community Wildfire Fuels Reduction/Mitigation Plan*. Inaction would mean forest canopies within the project area would continue to become denser and more closed in, and surface and ladder fuels would continue to accumulate. The risk of severe stand-replacing fire would increase as long as these stand conditions persisted. I believe such conditions create an unacceptable threat to lives and property in the wildland-urban interface and do not reflect wise management of these National Forest System lands.

### **Consideration of the Issues**

The Selected Alternative was designed in response to issues identified following development of the Proposed Action. These issues were fully presented earlier in this document. The table on the following page used issue indicators to compare the quantitative response of alternatives to the issues.

*Old Growth:* The Selected Alternative does not include any treatments within old growth timber stands and would create a high-contrast edge adjacent to old growth in only three units (13A, part of 14A, and 17) that are close to homes in the wildland-urban interface. Old growth stands in proximity to other units in the Selected Alternative have been protected by moving unit boundaries 300 feet away from the edge of the old growth stand. By selecting Alternative C, I have avoided treatment in 126 acres of old growth habitat and 121 acres of treatment in new, abrupt edge as shown in the above table.

**Table 2. Response of Alternatives to the Issues.**

<b>Issue and Issue Indicator</b>	<b>Alternative A No Action</b>	<b>Alternative B Proposed Action</b>	<b>Alternative C (Preferred)</b>	<b>Alternative C (Selected)</b>
<b>#1. Old Growth Forest</b>				
• Acres of understory fuel reduction in old growth habitat	0	126	0	0
• Acres of old growth habitat with new abrupt edge	0	138	17	17
<b>#2. Forested Wildlife Habitat</b>				
• Acres of potential lynx denning habitat proposed for seed tree or shelterwood treatment	0	330	265	265
• Acres of potential goshawk nesting habitat proposed for seed tree or shelterwood treatment	0	310	197	94
• Acres of loss of important white-tailed deer winter thermal cover.	0	420	308	304
<b>#3. Soils</b>				
• Acres of detrimental soil disturbance at high risk of exceeding 15%.	0	169	0	0
<b>#4. Aesthetics/Visuals</b>				
Acres of vegetation treatments by retention level at or along viewpoints:				
• low and moderate	0	792	559	559
• high	0	0	70	70
<b>#5. Tree Retention Levels</b>				
Acres of vegetation treatment by retention level:				
• low	38*	314	281	281
• moderate	1991*	3143	2515	2412
• high	1883*	455	558	531

\* untreated existing condition acres of proposed treatments in Alternative B

**Forested Wildlife Habitat:** The Selected Alternative was developed from the Proposed Action in part to offer additional protections to wildlife and wildlife habitat. The Selected Alternative is compatible with the Lynx Conservation Assessment and Strategy (LCAS); it also drops or modifies two units to better protect northern goshawk habitat. White-tailed deer winter range is also less impacted by the Selected Alternative in comparison to the Proposed Action. I believe that by choosing the Selected Alternative, I can best meet the Purpose and Need for the project while minimizing any effect to wildlife populations and habitat.

*Soils:* The Selected Alternative as modified includes several measures designed to protect soils and prevent any unit from reaching or exceeding thresholds of disturbance designated in the Regional Soil Quality Standards. Unit 500, which is currently at 16% detrimental disturbance and would have required rehabilitation under the Proposed Action, will receive hand treatment fuel reduction only in the Selected Alternative. This change will prevent any additional soil disturbance and soils in the unit will continue to recover naturally.

*Aesthetics/Visuals:* Several collaborators expressed concern regarding the visual impact of the Proposed Action on some specific units. In response to this concern, the Selected Alternative eliminated some units and reduced the treated acres or changed prescriptions to a higher retention level in others. The Proposed Action units that were altered to address this issue include 7, 21, 21A, 30, 31, 31A, and 35.

*Tree Retention Levels:* Compared to the Proposed Action, the Selected Alternative reduces the total acres to be treated with Low Retention (281 vs. 314) and Moderate Retention (2,412 vs. 3,143) while increasing the acres to be treated at High Retention (549 vs. 455). The Selected Alternative also reduces the total treated acres from 3,912 (Proposed Action) to 3,242. I believe these changes respond to the issue without comprising the effectiveness of meeting the purpose and need of the Valley Face Fuels Reduction Project.

## Summary

Overall, I conclude that Alternative C better meets the purpose and need of the project while protecting the environment than the Proposed Action (Alternative B) and the No Action Alternative (Alternative A). I have selected the alternative with associated design features as described in Appendix A for implementation. I have determined the environmental effects of implementing this alternative are acceptable.

## ***Finding of No Significant Impact***

In accordance with CFR 1508.13 and direction provided in the Forest Service Handbook (FSH 1909.15, Chapter 40, Section 43.1), I have determined that the management actions included in the Selected Alternative of the Valley Face Fuels Reduction Project do not constitute a major Federal action, and that the implementation of the proposal will not significantly affect the quality of the human environment. Accordingly, I have determined that an Environmental Impact Statement need not be prepared for this project. I have followed the implementing regulation for NEPA (40 CFR 1508.27) and other criteria for determining the significance of effects.

Before making my determination, I carefully reviewed and considered the following information:

- The direct, indirect, and cumulative effects of these actions as documented in the Environmental Assessment for the Valley Face Fuels Reduction Project;
- The analysis documentation in the Project Record of the Valley Face Fuels Reduction Project;
- Comments received during all scoping for this proposal; and,

- Past experiences with fuels reduction projects on the Flathead National Forest.

The Interdisciplinary (ID) Team and I have “screened” the management actions included in the Valley Face Fuels Reduction Project for “significant impact.” The results of this screen are summarized on the following pages.

**Significant**, as used in NEPA, requires consideration of both context and intensity.

**Context** means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant (40 CFR 1508.27).

The effects of the proposed actions are limited in context. The project area is limited in size (2,095 acres of mechanical treatments and 1,147 acres of hand treatment) and the activities limited in duration (management actions associated with the proposal would be completed within a 3-year time frame). Effects are local in nature and are not likely to significantly affect regional or national resources.

Many of the treatment units are located adjacent to private property and homes. As such, the forest land surrounding these private lands would be affected by this proposal. The people most affected by the project will be the local residents on the adjacent lands. This action is also a continuation of fuels and thinning projects that have occurred for many years on the Flathead National Forest and elsewhere across the Northern Region and the nation as a whole. Short-term adverse effects would be mitigated through implementation of the Standards and Guidelines in the Land and Resource Management (Forest) Plan for the Flathead National Forest, Best Management Practices, and the design features (Appendix A) developed specifically for this project.

The project design features minimize and avoid adverse impacts to the extent that such impacts are almost undetectable and immeasurable, even at the local level. These design features include, but are not limited to, protection of riparian habitat, seasonal and operational restrictions to avoid impacts to wildlife populations and habitat; protection of sensitive or threatened plant species, protection of the soil resource, reclamation of temporary roads, and noxious weed abatement.

Within the context of the landscape as a whole, or at the stand level, the ecological consequences are not found to be significant in either the short or long-term.

**Intensity** refers to the severity of impact. Responsible Officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following ten aspects are considered in the evaluation of intensity (40 CFR 1508.27):

1. *Impacts may be both beneficial and adverse. A significant effect may exist even if the balance of effects will be beneficial.*

Both beneficial and adverse effects have been taken into consideration when making a determination of significance. While there will be beneficial effects, this action does not rely on

those effects to balance adverse environmental impacts. Detailed specialist reports included in the EA and Project Record contain comprehensive effects analyses, and the findings from these resource-specific reports form the basis for my decision.

It is my determination, based on review of these analyses and consultation with specialists, that the Selected Alternative, including mechanical and hand fuel reduction treatments, burning of thinning slash and natural forest fuels, and temporary road construction, would not have a significant impact on the environment. All effects would be small or short-lived. None is deemed irreversible or irretrievable and do not set in motion further effects. All potential direct, indirect, and cumulative effects are evaluated in the EA, specialist reports, and Biological Assessments and Evaluations.

*2. The degree to which the proposed action affects public health or safety.*

The fuel reduction treatments are designed to increase the efficiency of fire suppression efforts and reduce risks to firefighters, local residents, the public, structures, and natural resources. The implementation of these treatments would result in improved community safety because the fuel reduction would increase the chance of suppressing the fire before it reaches private property. All burning of thinning slash and natural fuels would comply with State Air Quality Standards and be coordinated through the Montana Airshed Group. Dust from timber hauling activities would be controlled using the dust abatement requirements within the stewardship/timber sale contract provisions.

Herbicide treatments of weeds would comply with label directions and in accordance with, and under decision authority of the Flathead National Forest Noxious and Invasive Weed Control EA and Decision Notice (USDA May 2001), to which the Valley Face Fuels Reduction Project EA tiers.

Project design features have been developed to address public safety concerns associated with the proposed harvest and associated actions. I believe that the proposed action would not likely have any significant impact to public health or safety.

*3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.*

The project area does not contain, and is not near areas that have been identified as ecologically critical or otherwise unique for the geographic area. Heritage surveys have been completed and no previously undiscovered sites within the project area boundaries were found. The project area includes wetlands, but impacts to wetlands would be avoided during project layout and under contract provisions for vegetation treatments.

Based on this information, I conclude that the Selected Alternative would have no effects on unique resources.

*4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.*

Based on the limited context of the project, my review of comments received during the scoping of this project, and the analysis documented in the EA and Project Record, I do not find any highly controversial effects to the human environment.

I conclude that the effects of the Selected Alternative are not considered highly controversial by professionals, specialists, and scientists from associated fields of forestry, wildlife biology, soils, fisheries, and hydrology.

5. *The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.*

Based on my review of comments received during the scoping of this project and the analysis documented in the EA and Project Record, I find the possible effects on the human environment that are uncertain or involve unique or unknown risks are minimal or non-existent.

Given the nature of the trees and lesser vegetation to be removed and the large proportion to be left, the effects to the quality of the human environment are not significant. The agency has considerable experience in such projects and the consequences of such actions are well established and predictable.

A technical analysis (EA and Project Record) that discloses potential environmental impacts (which is supportable with use of accepted techniques, reliable data, and professional opinion) has been completed, and I believe that the impacts of implementing this proposal are within the limits that avoid thresholds of concern.

6. *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.*

The Valley Face Fuels Reduction Project represents a site-specific project that does not set precedence for future actions or present a decision in principle about future considerations. Any proposed future project must be evaluated on its own merits and effects. The proposed actions are compatible with the Forest Plan, and the capabilities of the land. I believe that this action does not represent a decision in principle about a future consideration.

7. *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.*

Connected, cumulative, and similar actions have been considered and included in the scope of the analysis. The analysis accounts for past, present, and reasonably foreseeable actions of the Forest Service, private timber companies, and private landowners within the project area. Based on my review of the analysis and disclosure of effects in the EA, specialist reports, Biological Assessments and Evaluations, and other analyses in the Project Record, I conclude that the Valley Face Fuels Reduction Project does not represent potential cumulative adverse impacts (EA, Table 3-1 and individual resource cumulative effects worksheets in the Project Record).

8. *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.*

I am not aware of any features in the affected area that are listed or are being considered for listing on the National Register of Historic Places.

Heritage surveys have been completed in the Valley Face Fuels Reduction Project area and no previously undiscovered sites within the project area boundaries were found (EA, pp.269-272, and Exhibit K-2). The potential for impacting undiscovered sites is mitigated by compliance with Forest Plan standards and guidelines, and through the design features included as part of the Selected Alternative (Appendix A). In the event such resources are discovered during project implementation, they will be evaluated and protected. I believe that this action will not have a significant effect on scientific, cultural, or historical resources.

9. *The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.*

No threatened or endangered species or its habitat would be adversely affected by the implementation of the proposed action. Biological Assessments (BA) for threatened and endangered species have been completed for the proposal; these BAs and supporting documentation led to the following determinations for listed species:

**Table 3. Threatened and Endangered Species Determinations**

Species	Determination	Project Record Exhibit
Bald eagle	May affect, not likely to adversely affect	Exhibit Rt-11
Grizzly bear	May affect, not likely to adversely affect	Exhibit Rt-11
Gray wolf	May affect, not likely to adversely affect	Exhibit Rt-11
Canada lynx	May affect, not likely to adversely affect	Exhibit Rt-11
Bull trout	No effect	Exhibit F-2
Water howellia	No effect	Exhibit S-3
Spalding's catchfly	No effect	Exhibit S-3

10. *Whether the action threatens a violation of Federal, state, or local law or requirements imposed for the protection of the environment.*

As described in the EA (Regulatory Framework and Consistency sections for each resource area in Chapter 3), the proposed action is consistent with all applicable Federal, state, or local laws or requirements imposed for the protection of the environment, including:

- The National Forest Management Act (NFMA)
- The National Environmental Policy Act (NEPA)
- The Endangered Species Act
- The Clean Water Act and Montana State Water Quality Standards
- The Clean Air Act
- The Migratory Bird Treaty Act

- The National Historic Preservation Act
- The American Graves Protection and Repatriation Act
- American Indian Religious Freedom Act
- The Environmental Justice Act
- The Healthy Forests Restoration Act

The Selected Alternative is consistent with Forest Plan direction.

I have concluded that the proposed action does not violate any Federal, state, local laws or requirements imposed for the protection of the environment.

### ***Findings Required by Laws, Regulations, and Policy***

The Valley Face Fuels Reduction Project EA addressed the regulatory framework and regulatory consistency by resource area. I have determined that my decision is consistent with the laws, regulations, and policies related to this project. The analysis leading to my decision was developed within the framework of the following laws, regulations, and policies.

#### ***The National Forest Management Act (NFMA)***

##### **Consistency with Forest Plan Standards, Goals, and Objectives**

The Flathead National Forest Land and Resource Management Plan of 1986 (Forest Plan) establishes management direction for the Flathead National Forest. This management direction is achieved through the establishment of Forest-wide goals and objectives, standards, and guidelines. Additional goals and accompanying standards and guidelines have been established for specific Management Areas across the Forest. Project implementation consistent with this direction is the process in which desired conditions described by the Forest Plan are achieved. The National Forest Management Act requires that all project-level resource plans, such as this DN, are to be consistent with the Forest Plan (16 USC 1604(i)). The EA displays the Forest Plan and Management Area goals and objectives and the standards and guidelines applicable to the Valley Face area (EA, Appendix B). The alternative development process is detailed in Chapter 2 of the EA and in the Project Record, while the management goals of the alternatives and the environmental consequences of the alternatives in relation to the Forest Plan standards and guidelines are described in Chapter 3 of the EA. After reviewing the EA, I find that my decision is consistent with Forest Plan standards, goals, and objectives as amended.

**Project-Specific Amendments to the Forest Plan.** The Forest Plan states on page II-20, “A project-specific amendment of a Forest Plan standard may be undertaken if it is demonstrated during project analysis that it will fulfill the objective of the standard and related goals.” With this decision, I am approving a project-specific amendment to the Forest Plan related to management area direction.

*Project-Specific Amendment of a Management Area 9 Standard.* This will temporarily amend an MA 9 standard (Wildlife and Fish Standard #4 for MA 9, Forest Plan page III-35) to allow timber

harvest and fuels reduction in Units 17, 18, 21, and 421 and reduce the percent of thermal cover in the Mountain Meadow MA 9 white-tailed deer winter range from 50% to 42.4%. Refer to EA Appendix B for a map of MAs in the Valley Face area.

The reason a site-specific amendment is warranted is that the small reduction in thermal cover is not expected to impact the population. Adequate thermal cover exists in the remaining MA 9 areas, including the Pete Ridge area that annually receives the greatest winter use by white-tailed deer in the analysis area. The Mountain Meadow MA9 area is not considered a moderate- or high-use area by the Montana Department of Fish, Wildlife, and Parks. This temporary project-specific amendment will reduce the standard for thermal cover in the Mountain Meadow MA 9 white-tailed deer winter range to 42 percent from the date this Decision Notice is signed until timber harvest and fuel reduction is completed in these four units.

**Finding of Nonsignificant Amendment.** The FSH 1909.12, Land and Resource Management Planning Handbook, 5.32, process to amend the Forest Plan, identifies the following four factors to consider in determining whether a change to the Forest Plan is significant or non-significant, based on NFMA planning requirements:

**1) Timing.** This project-specific amendment will be short-term in nature and will be completed within three to five years. It is anticipated the current MA 9 areas in the Valley Face area will be relocated in the revised Forest Plan. The Flathead Forest Plan revision is currently underway, with a decision anticipated in 2007.

**2) Location and Size.** These project-specific amendments apply to specific management area locations in the Valley Face area. This DN affects land mapped as MA 9; however, vegetation treatment in these areas does not affect white-tailed deer because of the low quality of the winter range and the high quality winter range to the east and south (Exhibit Rg-4).

**3) Goals, Objectives, and Outputs.** The overall goal of the standards for MA 9 is to provide winter range habitat for white-tailed deer. This goal will not change with this amendment because the areas affected are not providing high quality winter range habitat and other high quality winter range habitat is available.

The changes described for this amendment will not alter the long-term relationships between the levels of goods and services projected by the Forest Plan for the reasons stated in the preceding paragraph. The changes described for this short-term amendment specific to this project do not trigger an increase or decrease in outputs for other goods or services described in the Forest Plan. This amendment does not forego the opportunity to achieve outputs in later years.

**4) Management Prescription.** This modification is only for the MA 9 area in the vicinity of Mountain Meadows; it does not apply to other areas on the Flathead National Forest. The modification is also only for the decisions made in this document and not for any future decisions made in this area.

The anticipated goods and services to be produced for the MA 9 areas are not altered because the areas are not functioning well as white-tailed deer winter range.

*Determination:* Based on a review of the four factors above, I considered the project-specific amendment to be non-significant and the amendment may be implemented for this project.

### **Suitability for Timber Management**

The NFMA directs that no timber harvesting shall occur on lands classified as not suited for timber production pursuant to 36 CFR 219.14(a) except for salvage sales, sales necessary to protect multiple-use values, or activities that meet other objectives on such lands if the forest plan establishes that such actions are appropriate [36 CFR 219.27(c)(1)].

Stands proposed for harvest treatment in the Valley Face Fuels Reduction Project area were examined for suitability in accordance with 36 CFR 219.14. Inclusions of non-suitable land were identified within stands proposed for harvest (such as wet areas), and no treatment would occur in these areas. I believe that the remaining portions of these stands are suitable for timber management based upon the following:

- Meet the definition of forestland as described in 36 CFR 210.3.
- Technological feasibility exists to ensure soil productivity and watershed protection. All sites considered for treatment would use established harvesting and site preparation methods. Resource protection standards in the Forest Plan, project design features (Appendix A) and applicable BMPs (Exhibit H-17) would be sufficient to protect soil and water resource values.
- None of the stands considered for harvest have been withdrawn from timber production as specified in 36 CFR 219.14(4).

### **Clearcutting and Even-aged Management**

When timber is to be harvested using an even-aged management system, a determination that the system is appropriate to meet the objectives and requirements of the Forest Plan must be made. Where clearcutting is to be used, it must be determined to be the optimum harvest method [16 U.S.C. 1604(g)(3)(F)(i)]. No timber harvest using the clearcutting method is planned for this project.

Silvicultural site-specific prescriptions for the Valley Face Fuels Reduction Project have been prepared by a certified silviculturist and reviewed by the ID Team members. Target stand conditions were developed based on management objectives and site characteristics. The prescriptions considered existing stand conditions, the target stands, and resource constraints in determining the biological and technological feasibility of all silvicultural systems, including uneven-aged systems, and their appropriateness for the site.

I have reviewed the silvicultural information in the Valley Face Fuels Reduction Project, along with the site-specific management objectives developed from Forest Plan direction, and I have determined that the management practices described in the Vegetation section of the EA and supporting reports (Exhibits P-15 and P-16) are appropriate methods to achieve the multiple resource objectives on the sites selected for harvest.

**Vegetative Manipulation**

The activities included in my decision comply with the requirements under 36 CFR 219.27(b) in regard to altering vegetative tree cover. I have determined that the management practices in the Valley Face Fuels Reduction Project shall:

- Be best suited to the multiple-use goals stated in the Forest Plan for the area. Based on my review of pertinent information from the Project Record and the comments I received, I have determined that my decision, compared to the no action alternative and other action alternatives, is best suited to meet these goals.
- Not be chosen primarily based on economic criteria. My decision to implement the Valley Face Fuels Reduction Project is based on a variety of reasons as discussed elsewhere in this Decision Notice. Economics was only one of the many factors I considered in making my decision; the decision is not based primarily on the greatest dollar return, but rather reducing hazardous fuels and the vulnerability of the forest to large scale, dramatic disturbances.
- Be chosen after considering potential effects on residual trees and adjacent stands. In making my decision, I considered the effects of the selected alternative on residual trees and adjacent stands. The selected alternative includes management actions designed to meet or exceed Forest Plan guidelines for areas such as snag management (Exhibit Rd-3) and old growth habitat (Exhibits Q-10 and Q-17).
- Be selected to avoid permanent impairment of site productivity and to ensure conservation of water resources. My decision avoids permanent impairment of site productivity. This determination is supported by the effects disclosures in the EA (pages 161-176) and Project Record (Exhibits H-7, H-8, and H-20), through alternative design features (EA, pages 26-27 and Appendix A of this DN), and through the application of BMPs (Exhibit H-21).
- Be selected to provide the desired effects of water quality and quantity, wildlife and fish habitat, regeneration of desired tree species, forage production, recreation uses, aesthetic values, and other resource yields. The information provided in the Project Record documents that the vegetative management treatments included in my decision would achieve the desired forest vegetation conditions described in the silvicultural report (Exhibit P-18). After reviewing the social and environmental effects of the alternatives, I have determined that my decision is consistent with Forest Plan direction for the management of natural resources, including water quality/quantity, wildlife and fish habitat, recreation uses, aesthetic values, and other resource yields.
- Be practical in terms of transportation and harvesting requirements and total costs of preparation, logging, and administration. The information presented in the Project Record regarding transportation and harvesting requirements indicates that implementation of my decision is feasible and practical (Exhibits M, N, and P). Implementation of the project would not require significant investments in roads, since a road system is already in place. Logging of similarly situated areas has demonstrated the feasibility and practicality of this type of vegetative treatment.

**Roads**

The NFMA requires that the necessity for roads be documented and that road construction be designed to "standards appropriate for the intended uses, considering safety, cost of transportation, and impacts on land and resources" [36 CFR 219.27(10)]. The NFMA also requires that "all roads are planned and designed to re-establish vegetation cover on the disturbed areas within a reasonable period of time, not to exceed 10 years .... unless the road is determined a necessary permanent addition to the National Forest Transportation System" [36 CFR 219.27(11)].

Management actions associated with Valley Face Fuels Reduction Project do not include construction of specified permanent roads. Approximately 3.1 miles of temporary roads will be constructed and reclaimed after their use (Appendix A). I believe that we have met the intent of 36 CFR 219.27(10) and (11). Additional information regarding the road network in the analysis area can be found in the Roads Analysis (Exhibit M-1).

**Wildlife Viability**

The NFMA directs the Forest Service to manage wildlife habitat to maintain diverse populations of existing native and desired non-native species in the planning area. Based on my review of the wildlife Biological Assessment and Biological Evaluation for the Valley Face Fuels Reduction Project (Exhibits Rt-11 and Rs-3, respectively) and the document "Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities" (Exhibit Rg-1), I conclude that my decision poses little risk to the diversity and distribution of native wildlife species.

***The National Environmental Policy Act (NEPA)***

National Environmental Policy Act (NEPA) provisions have been followed as required by 40 CFR 1500. The Valley Face Fuels Reduction Decision Notice complies with the intent and requirements of NEPA.

Scoping for the project included public field trips and meetings, a mailing that provided information about the project and solicitation for comments, public notices (legal advertisements), and a public review/objection period. Issues identified during the initial scoping for the Valley Face Project assisted the ID Team and me in project design and with the analysis process. Project Record Exhibit C contains the comments received on this project.

Project Record Exhibit C-119 provides a summary of Forest Service responses to issues identified during the scoping of the project, and Appendix C of this DN provides my responses to issues identified during the objection period. This DN describes the decisions I have made and my rationale for making the decisions.

***Clean Water Act and Montana State Water Quality Standards***

Upon review of the EA and Project Record, I find that activities associated with my decision would comply with State water quality standards. My decision includes project design features and measures to protect the water resource (EA Chapter 2 and Appendix A of this DN) and applicable BMPs (Exhibit H-21) to achieve water quality standards. Inland Native Fish Strategy Riparian

Habitat Conservation Areas (RHCAs) would be established along all wetlands and stream courses that are in or adjacent to treatment areas.

### ***Clean Air Act***

After reviewing the EA and Project Record, I find that the activities to be implemented would be coordinated to meet the requirements of State Implementation Plans, the Smoke Management Plan, and Federal air standards.

### ***Endangered Species Act***

Under provisions of this Act, Federal agencies are directed to seek to conserve endangered and threatened species and to ensure that actions are not likely to jeopardize the continued existence of any of these species. Upon review of the Biological Assessments for wildlife, plants, and fish for the Valley Face Project (Exhibits Rt-11, F-2, and S-3), I find that the project meets the requirements of the Endangered Species Act. The U.S. Fish and Wildlife Service concurred with the determinations of effect arrived at in these assessments (Table 1, Exhibit Rt-21).

### ***Migratory Bird Treaty Act***

On January 10, 2001, President Clinton signed an Executive Order outlining responsibilities of Federal agencies to protect migratory birds. Upon review of the information provided in the EA (pages 253-256), the Terrestrial Biological Evaluation for the Valley Face Project (Exhibit Rs-3), and the document "Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities" (Exhibit Rg-1), I find that my decision complies with this Executive Order.

### ***National Historic Preservation Act, American Indian Religious Freedom Act, and Native American Graves Protection and Repatriation Act***

Based upon the analysis in the EA (pages 269-272), and material in the Project Record (Exhibits K2 and K-3), no impact on cultural resources is expected by implementation of the Valley Face Project.

Recognizing that the potential exists for unidentified sites to be encountered and disturbed during project activity, a special provision (B6.24) for their protection would be included in all contracts used to implement this project. This provision allows the Forest Service to unilaterally modify or cancel a contract to protect cultural resources regardless of when they are identified. I have determined that my decision to implement the Valley Face Project complies with the Region One programmatic agreement (1995), with the State Historic Preservation Office, and the Advisory Council on Historic Preservation.

The Forest Service has consulted with the Confederated Salish and Kootenai tribes during the analysis process (scoping and comment periods). The intent of this consultation has been to remain informed about Tribal concerns regarding the American Indian Religious Freedom Act and other tribal issues. In addition, the tribes have rights under the Hellgate Treaty of 1855, including hunting, gathering, and grazing rights. I believe that our actions fulfill the requirements under the National Historic Preservation Act and other related laws, regulations, and policies.

***Environmental Justice (Executive Order 12898)***

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires that Federal agencies make achieving environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high adverse human health and environmental effects of their programs, policies, and activities on minority populations and low-income populations. I conclude that the risk of such disproportionate effects on minority or low-income populations from this action is very low. My decision does not pose any significant socio-economic risks that disproportionately affect low income or minority populations in communities where timber producing employment opportunities and workers are located. The implementation of the Valley Face Project would not cause a significant change in local employment or revenue sharing with local communities. Thus, this decision should not disproportionately affect low-income or minority populations and communities.

***Appeal Provisions and Implementation***

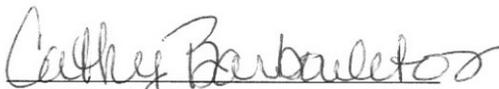
Copies of the Valley Face Fuels Reduction Project EA are available for review at the Tally Lake Ranger District Office in Whitefish, Montana, and at the Forest Supervisor's Office in Kalispell, Montana. The supporting Project Record, which includes the internal scoping, public involvement, and specialist reports, is available for review at the Tally Lake Ranger District.

This Decision Notice is issued under the authorities as defined by the Healthy Forest Restoration Act of 2003, section 101(2). It is not subject to notice, comment, and appeal provisions pursuant to 36 CFR 215 (see 36 CFR 218.3). Implementation of this project may proceed following publication of this Decision Notice.

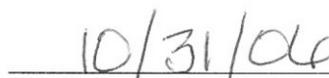
***Contact Person***

For further information on this decision, contact Bryan Donner, Project Leader, Tally Lake Ranger District, 1335 Highway 93 W, Whitefish, MT 59937, 406-863-5408, bdonner@fs.fed.us.

***Signature and Date***

  
CATHY BARBOULETOS

Forest Supervisor  
Flathead National Forest

  
Date

## Appendix A - Selected Alternative Description

The emphasis of the action alternatives described in the EA is the reduction of hazardous fuels throughout the project area in a manner consistent with the goals of the Flathead County Community Wildfire Fuels Reduction/Mitigation Plan for the Wildland Urban Interface. These alternatives were also designed to reduce the vulnerability of the forest to large scale, dramatic disturbances from insects, disease, and extreme wildland fire. The initial proposed action was developed based in part upon comments received from the public during public collaboration at the beginning of the project.

As stated earlier in this decision notice, I have selected an alternative that is a slight modification of Alternative C (the Preferred Alternative) in response to concerns expressed in the Predecisional Administrative Review Process. In particular, the Selected Alternative modifies the Preferred Alternative in response to concerns with the effects on wildlife habitat. I will now describe this alternative in relation to vegetation and fuels treatments, transportation management, and design criteria. A project monitoring plan follows in Appendix B. Please refer to Figure A-1 for locations of the proposed treatments.

### *Vegetation and Fuels Treatments*

Several types of prescriptions are proposed to meet the objectives that were described in the purpose and need statements in Chapter 1 of the EA. Three general categories of prescriptions proposed are regeneration harvest, commercial thin, and non-commercial fuels reduction. The retention level or average number of trees retained in each treatment method is shown in Table A-1, below, and described in detail in the Chapter 3 *Vegetation* section of the EA. The estimated trees per acre and canopy cover to be retained are expressed in ranges for each treatment method. Canopy cover is an estimate of the percent of the ground surface that would remain beneath the tree branches after treatment. The retention column indicates both the relative number of trees that would be left following treatment, and their distribution across the unit, either scattered throughout the unit (dispersed) or clustered in patches (aggregated).

The proposed treatment for each unit was determined from the current structure and species composition of trees and the desired future conditions for the stand. Retention would emphasize the largest, most fire tolerant trees, typically western larch and Douglas-fir.

Under the Selected Alternative, 2,095 acres of commercial harvest and 1,147 acres of non-commercial activity would reduce fuels in 69 units. As compared to the Preferred Alternative described in the EA, all of Unit 32 (27 acres) and a portion of Unit 31 (99 acres) were eliminated to maintain northern goshawk habitat. Within what was formally Unit 31, a new unit was created along the private boundary, designated Unit 413 (18 acres), which treats only the understory fuels and maintains goshawk habitat. A small portion (four acres) of Unit 27 was eliminated to maintain an area of large-tree wildlife habitat. Tables A-2 through A-5 display the proposed acreage and retention levels for each unit.

All action alternatives, including the Selected Alternative, were designed with no timber harvest in areas that are old growth or within riparian landtypes. One unit (#500) would be non-commercially thinned in 1 to 10 acre patches to reduce fuels, break the continuity of fuels, and improve long-term

thermal cover and short-term forage quality for white-tailed deer. Up to 75 acres would be treated in the 215 acre unit that currently contains dense sapling and pole-sized trees.

### Transportation Management

As in all alternatives described in the EA, no new permanent system roads would be constructed. A total of 39.2 miles of roads would have BMPs applied. This total is less than the amount described for the Preferred Alternative in the EA due to the elimination of Units 31 and 32. Seven temporary road segments totaling 3.1 miles would be required to access some of the units; these temporary roads would be obliterated following their use. Due to the elimination of a portion of Unit 32, temporary road 9 as described in the EA is no longer needed. See Table A-6 and Figure A-1 for details of each temporary road segment.

During the project development, the ID Team discovered several unauthorized roads (roads not designated or maintained) in the project area. These unauthorized roads totaling 1.3 miles in five separate segments would be used as temporary roads, although no construction is needed since they already exist on the landscape. In this decision notice, these roads are referred to as “temporary road reconstruction.” These road segments would be rehabilitated to prevent erosion and motorized access once they are no longer needed to conduct fuel reduction activities. No changes to designated system road use restrictions or maintenance level designations would occur. These roads are identified in Figure A-1.

**Table A-1. Key to Treatment Categories in the Unit Tables**

Treatment Method	Unit # group	Retention Description		
		Trees per acre	Label <sup>1</sup>	Canopy Cover <sup>2</sup>
<b>Seed Tree (ST)</b>	1-99	5-20 medium to large trees per acre.	LDR	5-10%
<b>Shelterwood (SW)</b>	1-99	10-40 medium to large trees per acre.	MDR	10-30%
<b>Commercial Thin (CT-M)</b> (moderate retention)	1-99	20 to 100 pole to large trees per acre.	MDR	15-40% (avg 30%)
<b>Commercial Thin (CT-H)</b> (high retention)	1-99	30 to 200 pole to large trees per acre.	HDR	40-90%
<b>Patch Thin (PT)</b> (wildlife habitat treatment)	500	1-10 acre openings within dense stands of small (pole) to medium trees.	MAR or HAR	5-40%  Average 60%
<b>Sapling Thin (PCT)</b> (non-commercial fuel treatment with precommercial thinning)	300	100 to 300 saplings per acre (Some units also have scattered pole to large trees).	LDR or MDR	5-40%
<b>Understory Fuels Reduction (USR)</b> (non-commercial fuel treatment)	200 400	50 to 200 small (pole) to large trees per acre.	MDR or HDR	25-90%
<b>Downed fuels removal (HP)</b> (non-commercial, hand fuel treatment)	400 (408, 410)	300 to 600 saplings to small (pole) trees per acre.	MDR	25-50%

<sup>1</sup>(L, M, H) DR=Low, Moderate, High Dispersed Retention; (L, M, H) AR=Low, Moderate, High Aggregated Retention. <sup>2</sup> Canopy cover = the proportion of the ground covered by the outermost foliage of trees above.

**Figure A-1.**

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Table A-2. Selected Alternative Commercial Harvest Units

Unit Number	Acres	Treatment Method	Retention Level	Logging <sup>1</sup> System	Slash <sup>2</sup> Treatment Method	Reforestation <sup>3</sup> Method
1	31	SW	MDR	Tractor	EX	Natural
3	27	SW	MDR	Tractor	EX	Natural
4	48	SW	MDR	Tractor	EX	Natural
4A	38	SW	MDR	Skyline	EX/JB	Natural
5	30	SW	MDR	Tractor	EX	Natural
6	20	SW	MDR	Tractor	EX	Natural
6A	36	SW	MDR	Skyline	UB	Natural
8A	59	SW	MDR	Skyline	UB	IP/PP
9A	61	SW	MDR	Swing	EX	IP/WP
10A	24	ST	LDR	Skyline	UB	Natural
11	12	SW	MDR	Tractor	EX	Natural
11A	25	ST	MDR	Skyline	UB	IP/WP
12	36	SW	MDR	Tractor	EX	Natural
13	24	SW	MDR	Tractor	EX	Natural
13A	38	SW	MDR	Skyline	JB	Natural
14A	14	CT-M	MDR	Swing	EX	NA
16	7	SW	MDR	Tractor	EX	IP/PP
16A	17	ST	LDR	Skyline	EX/JB	IP/PP
17	38	SW	MDR	Tractor	EX	IP/PP
18	105	CT-H	HDR	Tractor	EX	NA
19	103	CT-H	HDR	Tractor	EX	NA
19A	7	SW	MDR	Skyline	EX	IP/PP
20	147	CT-M	MDR	Tractor	EX	NA
21	107	SW	MDR	Tractor	EX	IP/WP
22A	14	SW	MDR	Skyline	EX/JB	IP/PP
24	51	CT-M	MDR	Tractor	EX	NA
25	76	CT-M	MDR	Tractor	EX	NA
26	69	CT-M	MDR	Tractor	EX	NA
27	109	SW	MDR	Tractor	EX	IP/PP
28	38	SW	MDR	Tractor	EX	IP/PP
29	16	SW	MDR	Tractor	EX	Natural
30	44	CT-M	MDR	Tractor	EX	NA
30B	8	CT-H	HDR	Tractor	EX	NA
31	78	SW	MDR	Tractor	EX	Natural
31A	52	SW	MDR	Skyline	EX/JB	Natural
33	12	SW	MDR	Tractor	EX	Natural
34	21	SW	MDR	Tractor	EX	Natural
35	88	SW	MDR	Tractor	EX	IP/WP
35B	16	CT-H	HDR	Tractor	EX	Natural
36	4	CT-M	MDR	Tractor	EX	NA
37	76	ST	LDR	Tractor	EX	Plant
37A	25	SW	MDR	Skyline	EX	Plant
38	46	ST	LDR	Tractor	EX	Plant
39	155	CT-M	MDR	Tractor	EX	NA

Unit Number	Acres	Treatment Method	Retention Level	Logging <sup>1</sup> System	Slash <sup>2</sup> Treatment Method	Reforestation <sup>3</sup> Method
41	43	SW	MDR	Tractor	EX/JB	Natural
Total Acres	2095					

<sup>1</sup>Logging System--Tractor=ground-based equipment, Skyline=cable equipment, Swing=ground and cable combined, NA=no product removal requiring use of mechanized equipment

<sup>2</sup>Slash Treatment—EX=Excavator pile; EX/JB=Excavator pile and jackpot burn; UB=under-burn, HP=hand pile

<sup>3</sup>Reforestation—Natural=allow natural restocking; Plant=plant larch, Douglas-fir; IP/PP, WP=interplant ponderosa pine, white pine; NA=no additional stocking needed

**Table A-3. Selected Alternative Pre-Commercial thinning with fuel reduction**

Unit Number	Acres	Treatment Method	Retention Level	Logging <sup>1</sup> System	Slash <sup>2</sup> Treatment Method	Reforestation <sup>3</sup> Method
300	38	PCT	LDR	NA	HP	NA
301	15	PCT	LDR	NA	HP	NA
302	38	PCT	LDR	NA	HP	NA
304	30	PCT	MDR	NA	HP	NA
305	88	PCT	MDR	NA	HP	NA
306	27	PCT	LDR	NA	HP	NA
307	30	PCT	MDR	NA	HP	NA
308	27	PCT	MDR	NA	HP	NA
309	144	PCT	MDR	NA	HP	NA
	437					

**Table A-4. Selected Alternative Non-commercial fuel reduction**

Unit Number	Acres	Treatment Method	Retention Level	Logging <sup>1</sup> System	Slash <sup>2</sup> Treatment Method	Reforestation <sup>3</sup> Method
400	54	USR	MDR	NA	HP	NA
401	50	USR	MDR	NA	HP	NA
403	44	USR	MDR	NA	HP	NA
404	15	USR	MDR	NA	HP	NA
405	43	USR	MDR	NA	HP	NA
407	40	USR	MDR	NA	HP	NA
408*	77	HP	MDR	NA	HP	NA
409	13	USR	HDR	NA	HP	NA
410*	51	HP	MDR	NA	HP	NA
411	10	USR	HDR	NA	HP	NA
412	7	USR	HDR	NA	HP	NA
413	18	USR	HDR	NA	HP	NA
417	21	USR	HDR	NA	HP	NA
421	33	USR	HDR	NA	HP	NA
423	19	USR	MDR	NA	HP	NA
	495					

\*Previously thinned units to receive hand-piling and burning of existing downed slash only

**Table A-5. Selected Alternative Wildlife Habitat Enhancement Unit**

Unit Number	Acres	Treatment Method	Retention Level	Logging <sup>1</sup> System	Slash <sup>2</sup> Treatment Method	Reforestation <sup>3</sup> Method
500	215 (75)	PT	HAR	NA	HP	NA

<sup>1</sup>Logging System--Tractor=ground-based equipment, Skyline=cable equipment, Swing=ground and cable combined, NA=no product removal requiring use of mechanized equipment

<sup>2</sup>Slash Treatment—EX=Excavator pile; EX/JB=Excavator pile and jackpot burn; UB=under-burn, HP=hand pile

<sup>3</sup>Reforestation—Natural=allow natural restocking; Plant=plant larch, Douglas-fir; IP/PP, WP=interplant ponderosa pine, white pine; NA=no additional stocking needed

**Table A-6. Selected Alternative Temporary Road Construction**

Temporary Road Segment Number	Approximate Miles of Temporary Road	Units Accessed by Temporary Road
1	0.4	4, 4A
2	0.1	5
3	0.2	9A
4	0.2	11, 11A
6	0.5	21
7	0.9	31, 31A
8	0.6	37, 37A
Total:	3.1	

### ***Design Criteria for the Selected Alternative***

The Forest Service requires protective measures specific to a land management project be employed during implementation. These specific protective criteria are designed during the planning phase of a project and updated as the alternatives are developed and modified. Broad management direction is taken from the Northern Regional Guide (USDA Forest Service 1983). Additional direction comes from applicable Forest Service manuals and handbooks. The following features have been incorporated as design criteria in the Selected Alternative.

#### Timing of Activities

Fuel reduction activities would be carried out beginning in 2007 and continue for approximately five years. Timber harvest, fuel reduction activities, and temporary road construction/obliteration would not occur in important big game winter range between December 1 and April 15 for big game security. This involves Units 13, 19, 19A, 20, 25, 26, 27, 29, 30, 31, 31A, 34, 35, 37, 37A, 41, 307, 405, 409, 423, and 500; also temporary roads 7. Between April 15 and July 31, timber harvest and fuel reduction would not occur in Units 409 or 30B, in order to avoid disturbance to nesting loons on Bootjack Lake.

#### Soils

To minimize erosion and other detrimental impacts to the soil resource, all road construction, reconstruction, and timber harvest would be completed using Best Management Practices (BMPs) or Soil and Water Conservation Practices (SWCPs). The practices are described in detail in the Forest Service Soil and Water Conservation Handbook (FSH 2509.22), the Soil Management

Handbook (FSH 2509.18), and the Flathead Forest Plan (pages II: 49-55) (Exhibit H-21). BMPs include practices such as providing for sufficient road drainage, limiting tractor logging operations to periods when soils are dry or under winter snow and less subject to compaction, seeding of landings and cut-and-fill slopes of roads, and maintaining undisturbed vegetation strips between cutting units and streams for sediment filtration. In order to conserve soil nutrients, treatment of slash in seed tree and shelterwood units would be delayed until after one wet season following harvest except where doing so would create an unacceptable wildland fire risk (see soils section of Chapter 3 of the EA). Each harvest unit and the proposed roadwork would be reviewed and applicable SWCPs identified on a site-specific basis for protection of the soil and water resource.

Two soil groups based on soil characteristics are used to discuss design criteria: sensitive soils and non-sensitive soils. Soils are sensitive when they have a high content of clay and silt, few rocks or gravel, and high water-holding capacity. Non-sensitive soils have enough rocks and gravel to provide support to ground-based equipment operating on the soils. Water drains out of these soils and they do not hold enough water to make them soft for extended times.

#### *Harvest Activities on Sensitive Soils*

Sensitive landtypes vary from one area to another depending on climate, geology, and soil characteristics. Sensitive landtypes in the analysis area are those that have fine-textured soils with high water-holding capacity and few rocks. These soils have high productivity, but because of their physical characteristics are subject to compaction and displacement during management activities, especially those activities that use ground-based equipment. This disturbance is most likely to occur when the soils are wet. Within the analysis area, Landtype 14-2 and all riparian landtypes are sensitive.

Only Unit 307 is located on a soil type (14-2) that is seasonally sensitive. Non-commercial, non-mechanized hand treatments would be used to reduce fuels in this unit to prevent adverse effects to soils.

#### *Harvest Activities on Non-sensitive Soils*

All other proposed management activities in the analysis area are on non-sensitive soils. The following practices would be used to reduce impacts on harvest units that are not on sensitive soils. All units would be logged using designated skid trails in either winter under conditions that protect the soil from rutting, displacement, and compaction; or in summer on soils that are dry enough to prevent rutting and puddling. Winter logging would not be allowed in those units identified as important big game winter range. In either case, skid trails must be spaced far enough apart to cause less than 15 percent of the unit to have detrimental soil disturbance from all causes including past management, skid trails, temporary roads, and landings.

There are two timing options for these units; either log in summer when the soils are dry by the “hand feel” method as described in Exhibit H-9 (usually after July 15th), or log in winter when there is frozen ground or at least 18 inches of settled snow. The winter logging option depends both on temperatures below freezing and sufficient snow depth to be effective. Skid trails can be spaced closer than 75 feet when winter conditions exist. Skid trails must be 100 feet apart when summer conditions exist.

Mechanical fuel reduction treatments are designed to meet Regional Soil Quality Standards that restrict detrimental soil disturbance to less than 15 percent of an activity area. Excavators disturb relatively small amounts of soil compared to dozers as discussed in the monitoring report called *New Soil Disturbance Associated with Slash Piling with an Excavator* (Exhibit H-11). Any mechanized piling or fuel reduction work would be accomplished with excavators.

#### *Harvest Activities on Areas with Previous Management*

All existing old road beds, trails or rail road beds should be reused where possible. This requirement would reduce the extent of both direct and cumulative effects caused by equipment operation. If they cannot be reused, their area must be considered when laying out skid trails so the end result is less than 15 percent detrimental soil disturbance. Any new trails on previously harvested units should be at least 100 feet apart. All logging activities should occur when soils are dry by the hand feel method as described in the project record or logged in winter when there is at least 18 inches of settled snow or frozen ground. The winter logging option depends on both temperatures below freezing and snow to be effective.

#### Wildlife

##### *Non-Game Wildlife Habitat*

Amendment 21 of the Flathead Forest Plan specifies the minimum number of snags, snag replacement trees, and pieces of downed wood to be left in each potential vegetation group (PVG). Although the minimum diameters are not always present in a given stand, these would be retained to meet or exceed the intent of the Forest Plan under all alternatives wherever they exist (Exhibit Rd-3). To provide for these snag and downed wood retention needs, as well as living tree canopy and large trees, the following would be prescribed:

- All live and dead larch and ponderosa pine 18 inches and greater diameter at breast height (DBH) and all live and dead Douglas-fir 25 inches and greater DBH would be retained, unless leaving them would compromise safety.
- Snags greater than 9 inches DBH that are felled for safety concerns would be left on site.
- Wherever present, at least 32 downed logs per acre that are 9 to 20 inches in diameter and at least 20 feet long would be left evenly distributed across the units. If there are too few large enough logs, 6 to 9 inches in diameter logs may be substituted to reach this number of pieces.
- Wherever present, at least 15 downed logs per acre greater than 20 inches in diameter and at least 6 feet long would be left evenly distributed across the units.
- Some slash piles would be left unburned in units, as described in Exhibit Rd-6.

##### *Wildlife Security*

Hunting, transporting of hunters, and transporting of game would be prohibited by timber, road building, or other contract workers while working on or off roads closed to motorized vehicle use by the general public.

Personal use firewood gathering would not be allowed by contractors or other workers on newly constructed roads or any other roads not open to motorized use by the general public.

All newly constructed (temporary) roads would be closed by sign or gate to public motorized use during and after road building and other activities. All existing roads currently closed to public motorized use would remain closed during implementation of all proposed activities.

Timber harvest, fuel reduction activities, and temporary road construction/obliteration would not occur in important winter range as discussed earlier under “Timing of Activities.”

### *Big Game Habitat Enhancement*

Shrub planting to improve habitat for big game and other species may occur on approximately 50 to 150 acres in or near some of the harvest units. Shrub planting would usually consist of willow, serviceberry, red-osier dogwood, mountain maple, or redstem ceanothus at a density of about 100 to 300 plants per acre. Shrub planting could take place in areas with light or and/or moderate tree retention where sufficient soil moisture and light would assure survival and most often near riparian areas.

### *Threatened, Endangered, and Sensitive Wildlife*

If any of the following are found within or close to any vegetation management unit or road location, operations within that unit or on that road would cease until the wildlife biologist is notified, and activities are modified if necessary:

- Active denning sites used by grizzly bears, wolves, lynx, fishers, or wolverines;
- Active nesting sites used by bald eagles, northern goshawks, black-backed woodpeckers, or flammulated owls;
- Active rendezvous (pup rearing) sites used by wolves.

All contractors and others implementing the project would be required to comply with a food-storage and sanitation order.

To avoid disturbance to nesting loons on Bootjack Lake, timber harvest and fuel reduction would not occur as discussed earlier under “Timing of Activities.”

A small portion of precommercial thinning Unit 302 may meet criteria for Canada lynx habitat. Accurate elevations on the ground would be measured at the time of unit boundary determination and any portions above 4100 feet in elevation would be excluded from treatment.

### Water and Fisheries

Many of the BMPs applied to protect the soil resource would also protect watershed, fisheries, and riparian values. The measures described in the Streamside Management Zone Act (SMZ-1993, also referred to as Montana House Bill 731) and applied to this project would protect all perennial and intermittent streams flowing adjacent to treatment units. The proposed units would also be consistent with guidelines and standards within the Inland Native Fish Strategy Environmental Assessment and its July 1995 Decision Notice (USDA Forest Service 1995).

Rehabilitation of drainage features on system roads (BMPs) as described in the Proposed Action is a feature common to both action alternatives, including two culvert replacements to reduce

sediment and facilitate fish passage on FSR 2956 and FRS 542 on Lost Creek. Additional culvert replacement may occur as opportunities are identified during project implementation.

### Air Quality

All prescribed burning conducted in this area would be in compliance with the Smoke Management Plan prepared by the Montana Air Quality Bureau and administered by the Montana State Airshed Group (Forest Plan, page II-64) through a Memorandum of Agreement. The Environmental Protection Agency (EPA) has approved these plans as meeting the requirements of the Clean Air Act as amended in 1987. Burning plans would be developed where prescribed burning is the method selected for slash hazard reduction and site preparation for reforestation. When feasible, prescribed burning would be done in the autumn to better mimic the natural fire regime. Nighttime burning that could affect local communities would be avoided because smoke dispersal is worst during this time. Stumps and heavy fuels (logs) would be fully extinguished adjacent to private land with residences to reduce the lingering smoke that can occur from these smoldering fuels; as well as to reduce the chance of escaped fire.

### Vegetation

#### *Timber Harvest*

In units to be naturally regenerated, phenotypically superior leave trees would be selected whenever possible to increase the likelihood of leaving superior genotypes as seed sources. In all units, the largest trees would be favored to leave; harvest prescriptions would include minimum diameter limits for western larch, ponderosa pine, and Douglas-fir, as described above in the wildlife part of this section. All hardwoods would be retained, unless they compromise fuels or reforestation objectives. Small understory trees, either individually or in clusters, would also be left in harvest units to provide for vertical diversity in the stand to the extent possible without compromising fuel reduction objectives.

#### *Fuels Reduction*

Prescribed fire management plans ("burn plans") are written for each individual prescribed burn and include plans for ignition, holding, escaped fire contingency, mop-up, and patrol. This is to ensure that each burn meets the objectives prescribed for that particular area. The plan is designed to use the prescribed weather, personnel, and equipment that are needed to control the burn within the identified boundaries.

Most sub-merchantable trees would typically be felled or "slashed" and subsequently piled and burned in order to reduce the amount of ladder fuels in the residual stand. As noted above, some small understory trees would be retained to provide vertical diversity.

Fuels treatment without a commercial timber harvest or underburning would occur on about 1,000 acres. Vegetative materials to be piled and burned are brush and small-diameter trees and existing down and dead fuel. The work would be accomplished using hand tools and chain saws to move, pile, and burn material.

### *Noxious Weeds*

Invasion and spread of noxious weeds is a concern in the analysis area. New cut and fill slopes would be seeded with a certified weed-free grass species mix for erosion control and to prevent establishment of noxious weeds. Any non-native seed applied would be short-lived or non-invasive.

During project implementation, logging, site preparation, and road reclamation equipment used in the area would be washed to remove weed seeds. This action is consistent with recommendations in *An Evaluation of Noxious Weeds in the Lolo, Bitterroot, and Flathead Forests* (Losensky 1987). Roadside clearing should be limited to retain as much shade as possible to help inhibit the establishment and success of noxious weeds. A Forest-wide environmental analysis (Flathead National Forest Noxious and Invasive Weed Control Decision Notice and Finding of No Significant Impact, May 2001) set priorities and parameters for noxious weed control. Weed treatments in the analysis area would be consistent with this strategy.

### *Revegetation with Native Plants*

In places where it is necessary to revegetate, the Regional Forester has determined that using native plant species is desirable to protect ecosystem integrity. It is currently the policy of Region One to collect seed or cuttings locally for cultivation and subsequent planting. This policy and practice would occur following any action in the Valley Face decision that requires revegetation, to the extent that funds are available. In the event that funding is not available for planting native plants, short-lived or non-invasive non-native plants would be used.

## Roads

### *Road Maintenance*

Road maintenance actions consisting of brushing and blading may be needed on some of the haul roads within the project area. Other minor drainage work such as the placement of drain dips would likely take place. Dust abatement and blading would occur as needed on the main haul routes.

### *Temporary Road Obliteration*

All temporary roads constructed for timber harvest would be obliterated immediately after mechanical slash reduction activities are complete or after the timber harvest activity is complete if the unit is to be underburned. Obliteration would consist of removal of any culverts, recontouring the slope, and revegetating the disturbed area with native grasses, shrubs, and trees.

## Visual and Scenic Resources

The following are examples of techniques to be used to manage the effects of timber harvesting and fuels management on the appearance of the landscape. Implementation of these techniques would help ensure that scenic resource goals are met. These techniques are shown based on viewing distance zones.

Foreground viewing zones: "Foreground viewing zone is based upon distances at which details can be perceived. It would usually be limited to areas within 1/4 to 1/2 mile of the observer, but must be determined on a case-by-case basis" (from USDA Handbook 701, *Landscape Aesthetics*).

The following guidelines would be used in all units along open roads where safety for the public and contractors can be maintained and are practicable with the prescribed logging methods:

- Use whole tree removal.
- Designate skid trails to angle away from line of sight.
- Dispose of burn piles during the same or second year of operation.
- Place hand piles back at least 100 feet from the edge of roads and behind natural screens.
- In order to retain a moderate Scenic Integrity Level along open roads in units 18, 21, 22a, 35, 35b, and 41, residual trees should be irregularly spaced. In addition, 10 to 20 sapling and pole sized trees per acre irregularly spaced should be retained in the foreground viewing zone in these units.

Middleground and background viewing zones: "Middleground is defined as the zone which extends from the foreground viewing zone to 3 to 5 miles from the observer. Individual tree forms are usually only discernible in very open or sparse stands of trees. Background is defined as the distant part of a landscape or the area located from three to five miles to infinity from the viewer" (from USDA Handbook 701, *Landscape Aesthetics*). The following guidelines would be used in middleground and background viewing zones for Units 9a, 10a, 11, 11a, 16, 16a, 17, 24, 35, 35B, 37, 38, and 39 where safety for the public and contractors can be maintained and are practicable with the prescribed logging methods:

- Leave individual and clustered trees to minimize visual contrasts.
- Shape units to merge with topographic features.
- Feather unit edges with partial cut prescriptions where feasible.
- Locate units adjacent to older cutting areas to minimize visual contrasts, link units together, and connect them to existing natural openings.
- Duplicate shapes of natural openings.

### Cultural Resources

Field investigation in accordance with the National Historic Preservation Act is ongoing. This includes consultation with the State Historic Preservation Office, the Advisory Council on Historic Preservation, and local Native American tribes. Special timber sale contract provision "B6.24# Protecting of Cultural Resources" would be included in the timber sale contract to assure protection of cultural sites.

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## Appendix B – Monitoring Plan

Monitoring is gathering information and observing management activities to provide a basis for periodic evaluation of Forest Plan goals and objectives. The purpose is to determine how well objectives have been met and how closely management standards have been applied during and after project implementation. Evaluation of the monitoring results assists in the review of the condition of NFS lands as required by National Forest Management Act regulations. It may result in decisions for further action, such as modifying management practices.

There are three basic types of monitoring:

- (1) **Effectiveness Monitoring** is used to determine if management practices as designed and executed result in the desired resource condition.
- (2) **Implementation/Compliance Monitoring** is used to determine if goals, objectives, standards, and management practices are implemented as detailed in the Forest Plan, this EA, or by other State or Federal agencies. This would be performed by contract administrators, the ID Team, and resource specialists.
- (3) **Validation Monitoring** examines the quality of the data and assumptions used in the analysis process.

Several sources of funding exist for resource monitoring. Some items would be funded with Knutson-Vandenberg (KV) funds, while other items would be funded with appropriated funds. No assignment of funding source to the monitoring is made at this time because future availability of funds is unknown. Priorities for annual monitoring are established and agreed upon by the ID Team and the Responsible Official, and implementation would be based on annual budgets and program direction. All legally required monitoring would be performed.

Monitoring activities are discussed by environmental component, consistent with those used in the EA.

### **Soils**

#### *Effectiveness Monitoring:*

Forest Service Region 1 Draft Soil Quality Standards, 1999, states that at least 85 percent of an activity area must have soil that is in satisfactory and productive condition. This same document describes conditions that are not satisfactory. To determine if this direction is met, several units would be monitored if the Selected Alternative is implemented. Monitoring would be concentrated on units with the highest levels of past disturbance. These units are at a higher risk of exceeding the soil quality standards. At a minimum Units 3, 19, 19a, and 26 would be monitored.

These units represent a cross-section of the management activities that would occur within the Selection Alternative and would span the entire time frame for the project (approximately 6 years). Monitoring would follow the process outlined by Howes (undated) in Exhibit H-21. Monitoring would consist of random transects across the units. The condition of the soil surface would be

recorded. Along with the condition of the soil surface, the amount of large woody debris and the percent organic cover would be determined. The objective for monitoring is to see that the productive potential of the land is maintained at a minimum of 85 percent of natural conditions.

#### *Implementation Monitoring:*

District fire personnel would monitor moisture conditions to ensure that burning occurs when soil and duff moisture content would promote fires that maintain organic matter and nutrients on the burned areas.

For units harvested by mechanical means (dozers, skidders, etc.), soil moisture levels would be monitored by the Sale Administrator to ensure that logging, fuel treatment, and site preparation activities are conducted during periods when soils are below the recommended moisture content and less susceptible to compaction. Effects of logging on soils in units harvested by mechanical methods would be monitored by on-the-ground review.

### **Vegetation/Timber Management**

Reforestation surveys would be conducted for each regeneration harvest unit. Surveys would occur at a minimum during the first, third, and fifth year following completion of the initiating activity for reforestation (site preparation or planting). This monitoring is necessary to assure adequate stocking levels for stand certification (Flathead Forest Plan, Appendix I). Funding for this monitoring is incorporated into the Knudson-Vandenberg trust funds of the timber sale contracts.

Surveys would be conducted on all units before and after site preparation and slash treatment activities are accomplished. These would meet the dual purpose of determining whether fuel management and site preparation objectives are met and to gather data on the current condition of stands for planting needs.

All harvest activities would be monitored to ensure compliance with contract specifications. Minor contract changes or contract modifications would be enacted, when necessary, to meet objectives and standards on the ground. Timber sale layout, harvest unit prescriptions, and timber sale contract provisions would be reviewed by a district management team to determine compliance with Forest Plan and EA goals, objectives, and standards prior to sale award.

Assessment for any noxious weed problem would continue for at least three years following road reclamation activities.

### **Wildlife**

Monitoring would determine if timber sale and site preparation activities maintained appropriate levels of present and future snags and large woody debris. This should be done after the first several units are harvested.

Monitoring of species associated with old growth habitats would occur in accordance with the Forest Plan.

Monitoring of winter white-tailed deer use in Units 500 and 19 would occur after treatment.

Monitoring of loon nesting success would continue in the nesting seasons before and after implementation of nearby fuel reduction and timber harvest.

Monitoring to assess effectiveness of public motorized access restrictions on temporary roads and other closed roads used for project implementation would occur during project activities and during big game hunting season.

### **Roads**

All road construction and road maintenance would be monitored to ensure compliance with specifications and to meet the intent of management practices. Specifications would be designed to meet objectives and management practices. The Forest Service would monitor the work performed by the contractor to ensure that their methods of operation and work are in compliance with the specifications that were designed to meet the intent of the management practices. If the designed work is not meeting the objectives and management practices, a modification may have to be made by the Forest Service to change the work to meet the objectives and management practices.

### **Watershed and Fisheries**

Potential sediment sources (such as stream crossings and road construction/reconstruction) in the sale area would be monitored to assess the need for stabilization to protect habitat for cutthroat trout and other aquatic species. Areas of disturbed soil as a result of logging and road reclamation would be monitored for revegetation.

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## Appendix C

### Forest Service Response to Objection Issues and Suggested Remedies

#### **Objectors: The WildWest Institute and Alliance for the Wild Rockies (Missoula, Montana)**

##### **I. Violation of environmental laws, regulations, and policy.**

**Issue 1.** *The EA does not conform to the National Environmental Policy Act.*

Suggested remedy: None

**FS Response:** The development of the Valley Face Fuels Reduction Project has followed the Council on Environmental Quality (CEQ) NEPA Implementing Regulations, including 40 CFR 1501.3(b): Agencies may prepare an environmental assessment on any action at any time in order to assist agency planning and decision making.

**Issue 2.** *When they distributed the EA, the FS did not distribute previous comments on the Proposal nor the agency's responses to the comments. NEPA regulations require agencies to provide such comments and responses for EISs. Courts have consistently ruled that NEPA requirements for EISs must be followed with the use of EAs.*

Suggested remedy: Because the FS has not apparently responded to our July 26, 2005 comments on the project proposal, the objection review process must now respond in writing to our comments.

**FS Response:** The Response to Comments document for the Valley Face Fuels Reduction Project is Exhibit C-119 located in the project record notebooks at the Tally Lake Ranger Station and is available on request. The document has also been posted on the Flathead National Forest website at: [http://www.fs.fed.us/r1/flathead/nepa/valley\\_face/response%20to%20comments.pdf](http://www.fs.fed.us/r1/flathead/nepa/valley_face/response%20to%20comments.pdf) All comments received were considered during the development of Alternative C.

**Issue 3.** *The EA mixes, and thus confuses, two separate issues, those being hazardous fuels and "forest health." 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).*

Suggested remedy: None

**FS Response:** The treatment units were not selected on an either/or basis; the goal for all treatment units includes the reduction of hazardous fuels and establishment of healthy, more fire, insect, and disease-resistant stands.

**Issue 4.** *The EA fails to deal lucidly with the hazardous fuels issue on the appropriate landscape scale. The EA only discusses fuel conditions in the areas proposed for treatment, yet wildland fire operates beyond artificial ownership or other boundaries. Likewise, the appropriate landscape scale for the "forest health" issues is also beyond the treatment units, but not adequately considered.*

Suggested remedy: None

**FS Response:** The EA considers the condition of hazardous fuels across the entire 35,300 acre analysis area (p. 101) and likewise considers forest health related to insect and disease susceptibility across the entire area (pp. 52-53).

**Issue 5.** *The EA also fails to deal with the fuels issue on the appropriate temporal scale. The EA basically theorizes fire behavior at some short-duration fixed time period following treatment (ignoring the heightened fuel risk due to the logging activities, by the way) but doesn't consider the obvious fact that vegetation response to the proposed activities will be rapid in the understory, and also significant for smaller tree growth in the years following treatment.*

Suggested remedy: None

**FS Response:** The Fire and Fuels section of the EA (p. 112) acknowledges that slash generated in units would create a short-term increase in high fire hazard until treated. A slash treatment plan is prescribed for each vegetation and fuels treatment unit. The Fire and Fuels section of the EA also concludes that proposed treatments would be successful at reducing fire severity for a period of 15 to 20 years (p. 118), and notes that “at that time, maintenance fuel reduction treatments may be needed.”

**Issue 6.** *And since this “fuel reduction regime” was not a planning scenario dealt with in sufficient detail (if at all) during Forest Plan development, both the project-level and programmatic ecological and economic costs and impacts go unexplained and undisclosed.*

Suggested remedy: 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.

**FS Response:** Conditions on the entire forest are beyond the scope of this project, which is focused on conditions that would potentially affect lives and property in the Valley Face analysis area. Future fuel reduction projects are likewise outside the scope of the Valley Face Fuels Reduction Project; however, like Valley Face, any such projects would likely focus on areas identified as a high priority for fuel reduction in the *Flathead County Community Wildfire Fuels Reduction/Mitigation Plan*.

**Issue 7.** *Hayward, 1994 essentially calls into question the entire manipulate and control regime, as represented in the EA. The managed portion of the Flathead National Forest has been fundamentally changed, as has the climate...*

Suggested remedy: ...the Forest Service must analyze how much land has been fundamentally changed forestwide compared to historic conditions, and disclose such information to the public in the context of an EIS by completing the Forest Plan Revision process.

**FS Response:** An analysis of forest-wide conditions is beyond the scope of this project; the Forest Plan revision process is currently underway on the Flathead National Forest. Please refer to the draft Forest Plan and supporting documents for additional information regarding current and historic conditions.

**Issue 8.** *The FS's usual response to our comment that the fire planning issue is indeed programmatic, is that it is “out of the scope” of a project analysis, which is precisely our point: the FS has so far failed to deal with this issue within the appropriate forestwide or landscape level. In the absence of such planning, the public and decisionmaker for this project proposal is extremely uninformed. So, for example, fire suppression actions are never disclosed, as NEPA requires.*

Suggested remedy: None

**FS Response:** The Flathead NF does have a forest-wide plan for dealing with wildland fires that identifies suppression of all fires as the appropriate response in the Valley Face area. In addition, the Valley Face Fuels Reduction Project was designed to respond to the *Flathead County Community Wildfire Fuels Reduction/Mitigation Plan*, which was a collaborative planning effort involving the community, including all the area fire departments and land management agencies. The Valley Face EA Fire and Fuels section discusses the effectiveness of past fire suppression actions (p. 103); because suppression has been so successful in the past (85 total acres burned in 70 years) there are no *direct* effects related to fire suppression actions to disclose in the Valley Face area. Indirect effects of fire suppression are discussed at length in the EA and are in fact a major contributor to the need for this project.

**Issue 9.** *The EA takes a very narrow, simplistic view of the science on fuel reduction and ignores scientific information that argues against its conclusions.*

Suggested remedy: The EA must be re-written to acknowledge the controversies, and remove its already-made decision biases.

**FS Response:** The Fire and Fuels section of the Valley Face EA cites more than 25 scientific references regarding wildland fire and fuels that were considered during the development of the project. The Response to Comments document (Exhibit C-119) also considers additional references cited by this objector in their comments on the project.

**Issue 10.** *Our original comments on the scoping level stated: “Please consider that thinning can result in faster fire spread than in the unthinned stand. Graham, et al., 1999a point...”*

*For example, the 20-foot wind speed<sup>1</sup> must exceed 50 miles per hour for midflame wind speeds to reach 5 miles per hour within a dense Stand (0.1 adjustment factor). In contrast, in an open stand (0.3 adjustment factor), the same midflame wind speeds would occur at only a 16-mile-per-hour wind at 20 feet.*

*Depending on the type, intensity, and extent of thinning, or other treatment applied, fire behavior can be improved (less severe and intense) or exacerbated*

*The FS disregarded this comment, which is extremely relevant to the EA’s whole issue of facilitating firefighting. How can the public have confidence in a plan to deal with the potential of fire, if the FS doesn’t address the issues raised that indicate that the rate of fire spread will likely increase in a thinned forest?*

Suggested remedy: None.

**FS Response:** The activities proposed for this project are expected to reduce potential fire severity in the treated stands by resulting in a reduction of total fuel loads. We agree with Graham et al. (1999) that thinning and other fuel treatments can reduce the severity of wildland fire; the science supporting this conclusion is the basis for the Valley Face Fuels Reduction Project. Wind speed is only one factor that affects fire behavior, and rate of spread is only one factor affecting fire intensity. The thinning included in this project will be accompanied by surface fuel reduction. This surface fuel reduction will include fuels created by fuels reduction treatments and existing surface fuels. Fire behavior calculations

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<sup>1</sup> Velocity of the wind 20 feet above the vegetation, in this case tree tops.

(including rate of spread) are discussed in the Fire and Fuels portion of the EA (pp. 113-121) and in the project record. Comments # 33 and 35 in the Response to Comments document (Exhibit C-119) also address the effect of fuel reduction on fire behavior and spread rates.

**Issue 11.** *It seems that the project is a part of a wider, continuing indiscriminate fire suppression strategy, without consideration of sensible wildland fire use—elevating the odds for the type of extreme events most feared.*

Suggested remedy: None.

**FS Response:** The Flathead National Forest does not indiscriminately suppress all fires; numerous wildland fires have been allowed to burn on FNF lands in recent years in areas with an approved fire use plan, and prescribed fire is also recognized and used as an important management tool on the forest. At the present time, the Valley Face area does not have an approved fire use plan, and fire suppression is the appropriate response to wildland fire in this area at this time. Given the number of homes in and adjacent to the area, the FNF and the *Flathead County Community Wildfire Fuels Reduction/Mitigation Plan* consider fire suppression to be the sensible approach to wildland fire in Valley Face.

**Issue 12.** *And as far as proposal “improvements” in “forest health”, the EA has little to offer except vague terminology. Vague assurances, but baseless and meaningless if further investigated.*

Suggested remedy: None

**FS Response:** The Vegetation section of the EA discusses forest health issues at length; please see for example pp. 52-53, 55-56, 73-74, and also see Project Record Exhibit P-1, Bark Beetle Analysis.

**Issue 13.** *None of the so-called cumulative effects discussion adequately discloses the effects of past management activities in a logically-defined analysis area, on land of any ownership.*

Suggested remedy: None

**FS Response:** The cumulative effects analysis area typically varies by resource area; for most resources the cumulative effects area for this project coincides with the Valley Face Analysis Area as described in the EA (e.g. Figure 2.1). Table 3-1 in the EA displays a summary of cumulative effects across all ownerships within the analysis area that were considered, when applicable, by individual resource specialists in their analysis of project effects. Each resource section of Chapter 3 in the EA also includes a discussion on cumulative effects for each alternative considered in the Valley Face Fuels Reduction Project. Additional supporting documentation by resource area can be found in the Project Record.

**Issue 14.** *The FS likes to claim that logs are merely a by-product of the “treatments” yet fails to adopt any meaningful limit to the size of trees to be cut. It vaguely assures that the big trees will be retained in thinning units, but none of the language in the EA would provide the public with any enforcement capability if the FS chose to make the units look essentially like clearcuts.*

Suggested remedy: None

**FS Response:** Page 27 of the EA states: “All live and dead larch and ponderosa pine 18 inches and greater diameter at breast height (DBH) and all live and dead Douglas-fir 25 inches and greater DBH would be retained, unless leaving them would compromise safety”. The intent both of the Healthy Forest Restoration Act and the Valley Face Fuels Reduction Project is to retain the largest trees and concentrate fuel reduction efforts on small and medium-sized trees. The vegetation section of the EA (p. 64) notes

that units treated with a seedtree prescription would still retain 5 to 20 of the largest trees on each treated acre.

**Issue 15.** *In order to comply with NFMA, its implementing regulations, and Forest Plan standards, the Region adopted soil quality standards (SQS). The EA does not demonstrate compliance with the SQS. Current estimates of detrimental soil condition are disclosed, however methodology for determinations is not detailed. The EA does not disclose accurate estimates of post-project detrimental disturbance in the activity areas. The EA merely provides some vague numbers purported to show the project activities will meet the 15% standard. The EA also fails to disclose the amounts of existing detrimental disturbance within past management-established activity area boundaries, making it impossible to assess overall watershed or project area soil health.*

*The EA at p. 157 admits that the areal extent of soil damage considered to be detrimentally disturbed does not include areas that were damaged in the past, claiming that the soils have “recovered.” The EA fails to substantiate this with either field data on residual damage in these areas nor monitoring of actual productivity of the soils.*

Suggested remedy: None

**FS Response:** Page 154 of the EA states: “Field observations were used in addition to the TSMRS queries to determine the existing conditions of proposed units. Field data sheets are in Exhibit H-7. Field observations followed the methods described in S.W. Howes, 2001, which is also in Exhibit H-7. Page 158 of the EA states: “This section describes the existing condition of (soils in) the proposed units (activity areas) within the Valley Face area. The timber stand database was used in conjunction with aerial photographs and field investigations to determine which proposed units currently had detrimental soil conditions caused by past management activities. All proposed units were individually examined on the ground to quantify/qualify the amount of detrimental soil disturbance.” Table 3-41 on page 158 displays the results of this assessment of soil condition for each unit. The predicted levels of post-treatment soil disturbance within each unit is displayed in Table 3-47 on page 173 of the EA; the accompanying text on pages 163-173 and Project Record Exhibits H-13, H-17, H-18, and H-22 support these estimates.

The recovery of past disturbance referenced on page 157 of the EA refers to soils in the entire analysis area, not soils within proposed treatment units. Soil condition in all proposed units was site-verified to determine current levels of disturbance. Table 3-40 displays the current level of soil disturbance on National Forest Systems (NFS) lands throughout the entire activity area.

**Issue 16.** *Since the FS has failed to complete its required Forest Plan monitoring, it is unable to cite any research that shows it can log an area and comply with the (soils) Standards.*

Suggested remedy: None

**FS Response:** Page 161 of the EA states: “The effects analysis is based on monitoring of past management activities on the Flathead National Forest. Monitoring reports used for comparison purposes were conducted on the same landtypes and soils as those proposed in this project...The monitoring looked at all forms of detrimental soil impacts, including compaction, rutting, puddling, displacement, and erosion from all sources such as past timber harvest or unauthorized off road vehicle use. In addition, literature is cited that refers to the aerial extent of detrimental soil disturbance impacts resulting from various harvest systems. The Flathead National Forest Soil Scientists have collected many bulk density measurements from soils where various types of equipment operated in a variety of capacities. A spreadsheet with the bulk density numbers and the type of equipment that caused them is in Exhibit H-

19, along with statistical evaluations of what those numbers mean to each other and to soil physical conditions that we monitor in the field.”

The replies to comments #93 and #94 in the Response to Comments document (Exhibit C-119) also discuss the issue of soils monitoring. Project Record Exhibits H-10, H-17, H-18, and H-21 discuss the results of monitoring soil impact in several past timber sales on the Flathead National Forest, and validation monitoring of the effectiveness of the protection and mitigation measures described in Chapter 2 of the EA.

**Issue 17.** *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. 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.*

Suggested remedy: None

**FS Response:** As noted on page 158 of the EA, all proposed treatment units were examined to quantify the amount of soil disturbance existing from all sources within the units. The Regional soils guidelines apply to the activity areas within the larger analysis area; soils in those portions of the analysis area outside the proposed treatment units would not be affected by the project. Table 3-46 on page 173 of the EA displays the cumulative impact to soils across the entire analysis area from existing conditions and proposed activities including landings and temporary road construction.

**Issue 18.** *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. Neither the EA, the Forest Plan, nor the SQS cite adequate scientific basis for adopting 15% as a numerical limit—it is simply arbitrary.*

Suggested remedy: None

**FS Response:** The objector raised this same issue during scoping on the project; comment #94 in the Response to Comments document (Exhibit C-119) responds to this issue, noting that the Regional standards are the best available guidelines for protecting soils. The response further notes research (Page-Dumroese, 2000, and others) that describes 15% as the lowest magnitude of change detectable given current monitoring technology.

**Issue 19.** *Furthermore, 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.*

Suggested remedy: None

**FS Response:** The objector provided this comment during scoping; the response to comment #137 in the Response to Comments document (Exhibit C-119) addresses this issue. The EA (pages 30 and 87) details the strategy for preventing/controlling noxious weed establishment and spread related to the Valley Face Fuels Reduction Project.

**Issue 20.** *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.*

Suggested remedy: None

**FS Response:** Please see the response to objection issue #16 above.

**Issue 21.** *It is now clear that monitoring has not, and will not, address either population or habitat trends of old-growth associated wildlife, and cannot be used as an indication of viability on the Flathead NF. Hence, the viability monitoring requirements as defined in the NFMA are not going to be met with Amendment 21 or the Valley Face project.*

Suggested remedy: None

**FS Response:** The objector had a similar comment during project scoping; please see comment #153 in the Response to Comments document (Exhibit C-119). Project Record Exhibit Rg-1, *Flathead National Forest Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities* analyzes the status of old growth-associated wildlife on the Flathead National Forest. Several Project Record Exhibits including Q-16, Rb-10, Rd-11, Rn-4, Rr-4, Rs-5, and Rt-7 provide additional information on wildlife monitoring and observation records. These records were used to establish the reliability of habitat-based status estimates for old growth dependent wildlife populations.

**Issue 22.** *The EA also ignores many structural habitat components necessary for the pileated woodpecker.*

Suggested remedy: None

**FS Response:** Project effects on pileated woodpecker habitat are discussed on page 182 in the EA, and Project Record Exhibit Q-9 also discusses the status of habitat for the species in the project area, both currently and following the implementation of the proposed treatments.

**Issue 23.** *...the EA provides absolutely no commitments for leaving specific numbers and sizes of large trees favored by so many wildlife species, resorting instead to vague statements in descriptions of the various silvicultural treatments proposed. This protects nothing.*

Suggested remedy: None

**FS Response:** This objection issue is similar to #16 above; please review that response. The EA on page 193 discusses the commitment of the Flathead National Forest to comply with all applicable standards relating to old growth, including Amendment 21 of the Forest Plan. The silvicultural prescriptions described on pages 59-72 of the EA explicitly describe the retention levels and diameter limits to be applied to the various treatment groups (seedtree, commercial thin, etc.). This information is also summarized in tabular form in Table 2-1 on page 15 of the EA.

**Issue 24.** *The EA has no pileated woodpecker habitat analysis. Since the FS has never analyzed the forestwide old growth situation in order to demonstrate it has the amount and distribution necessary to insure viability of old growth species' populations forestwide, the EA is based upon an inadequate cumulative impacts analysis for old growth dependent wildlife species. No such analysis was conducted for the Valley Face proposal.*

Suggested remedy: None

**FS Response:** The document "*Flathead National Forest Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities*" (Exhibit Rg-1) analyzes the population status of old growth dependent wildlife species at the forest scale. Exhibit Q-9 analyzes the status of those species including pileated woodpecker that were designated as Old Growth Management Indicator

Species prior to the adoption of Forest Plan Amendment 21. Exhibit Q-13 demonstrates the consistency of the Valley Face Fuels Reduction Project with Amendment 21. See also the response to Issue 22 above.

**Issue 25.** *Ruggerio, et al. (1998) and Bull and Blumton (1999) indicate that vertical and horizontal diversity provided by snags and large down woody debris are important habitat characteristics for the pine marten. Their research shows that the kind of treatments proposed for the Valley Face project reduce the availability of prey species for the marten. The EA's lack of analysis for impacts on marten viability are not scientifically defensible.*

Suggested remedy: None

**FS Response:** The effects of the project on the marten are discussed beginning on page 191 of the EA. Exhibit Q-9 in the Project Record considers project effects on the former old growth MIS species including marten. The document “*Flathead National Forest Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities*” (Exhibit Rg-1) analyzes the population status of old growth dependent wildlife species at the forest scale. Exhibit Q-18 is a regional assessment of the status of the marten species.

**Issue 26.** *Unfortunately, the EA makes no determination regarding the significance of the pine marten habitat losses associated with past or proposed vegetation treatments. This does not insure viability of the species, as NFMA requires.*

Suggested remedy: None

**FS Response:** The EA on page 191 states “According to previous standards, (LRMP Implementation Note #2), the marten habitat blocks would still be functional for marten and the species that were under its Management Indicator Species “umbrella” (Warren 1990, Fisher and Wilkinson 2005).” The document “*Flathead National Forest Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities*” (Exhibit Rg-1) analyzes the population status of old growth dependent wildlife species at the forest scale. Exhibit Q-9 analyzes the status of those species including pine marten that were designated as Old Growth Management Indicator Species prior to the adoption of Forest Plan Amendment 21. Exhibit Q-13 demonstrates the consistency of the Valley Face Fuels Reduction Project with Amendment 21.

**Issue 27.** *...the EA fails to disclose that the areas “treated” will retain characteristics meeting Northern Region old growth criteria—and if they won’t, how they will at some specified time in the future. There is no scientific certainty in the FS’s approach.*

Suggested remedy: None

**FS Response:** The EA devotes pages 188-192 to disclosing the effects of the project on old growth stands. The four old growth stands proposed for hand fuel reduction treatments under Alternative B would continue to function as old growth according to Green et al. (2005). No old growth would be treated under Alternative C. Page 193 of the EA documents the project’s compliance with NFMA by its adherence to Forest Plan Amendment 21. Several Project Record Exhibits provide additional information regarding the status of old growth in the Valley Face analysis area (Q-2, Q-3, Q-5, Q-7, Q-11, and Q-12).

**Issue 28.** *Logging, roadbuilding and other disturbance associated with the project and other cumulative impacts could affect northern goshawk nesting, post-fledging family habitat, alternative nesting, foraging, competitors, prey and potential habitat, including areas far from cutting units.*

Suggested remedy: Reynolds, et al. 1992, provides some basis for a northern goshawk conservation strategy that could be implemented if wider habitat considerations were to be truly taken into account.

**FS Response:** The analysis of existing conditions and project effects applied the habitat descriptions and management recommendations in the Reynolds et al. 1992 document (EA pages 3-242 through 3-245). This includes effects on nesting, post-fledging family habitat, alternative nesting, foraging, competitors, prey and potential habitat, at the stand level and at the scale of potential home ranges. This analysis approach is evident in Exhibit Rs-16, “Northern goshawk - potential habitat and effects analysis.” Exhibit Rs-17, “Northern goshawk biology and management background information”, includes the management recommendations from the Reynolds et al. 1992 document, as well as more recent and locally relevant science. The document “Flathead National Forest Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities” (Exhibit Rg-1) analyzes the population status of northern goshawks at the multiple scales, including the forest scale. In the Selected Alternative, Unit 32 and most of Unit 31 were eliminated from Alternative C in the EA to protect northern goshawk habitat. Within what was formally Unit 31, a new unit was created along the private boundary, designated Unit 413 (18 acres), which treats only the understory fuels. These changes make the Selected Alternative consistent with recommendations in Reynolds et.al.1992.

**Issue 29.** *Since the management direction proposed for the goshawk in the project area differs significantly from the current science, the agency has a responsibility to clearly explain to the public why their own management direction would work. The EA has clearly neglected to do so.*

Suggested remedy: the agency has a responsibility to clearly explain to the public why their own management direction would work.

**FS Response:** Based on the context of this issue in the objection letter, the WildWest Institute is requesting that the Forest Service apply the goshawk management recommendations in the Reynolds et al. 1992 document to the Valley Face project. As stated above in the response to Issue 28, the Valley Face analysis for goshawks was based on the habitat descriptions and management recommendations in the Reynolds et al. 1992 document (EA pages 3-242 through 3-245, and Exhibits Rs-16 and Rs-17).

**Issue 30.** *The issue of fragmentation should have been more thoroughly considered with respect to goshawks. Other edge-adapted species may compete with the goshawk and displace the goshawk if adequate amounts of forest interior habitat is not provided.*

Suggested remedy: Crocker-Bedford (1990) recommends that a foraging area of >5000 acres of dense forest, in which no logging is permitted, be designated for goshawks, with additional areas of 2500-5000 acres of more marginal habitat designated beyond this 5,000 acre foraging area.

**FS Response:** This is a misleading portrayal of the recommendations in the 1990 Crocker-Bedford article. The article (Exhibit Rs-17) actually stated that “...timber harvesting should avoid the entire feeding ranges of goshawks (>2000 ha [approx. 5000 acres]) until more is known about how to manage timber in a manner compatible with goshawks.” Crocker-Bedford’s recommendations for “marginal habitat” would regenerate 2500-acre “thirds” of goshawk nesting watersheds in succession, with a “rotation length extended well beyond that which maximizes timber yield.” According to more recent science, the management recommendations in the Reynolds et al. 1992 document do a far better job of addressing fragmentation issues of patch size and edge effects, as well as applying silvicultural manipulations that appear to be more in line with the needs of the goshawk. As described above in the response to Issue 28, the management recommendations for goshawk in the Reynolds et al. 1992 document were applied to the Valley Face project (EA pages 3-242 through 3-245, and Exhibits Rs-16 and Rs-17). These include patch sizes and fragmentation effects on goshawk. The Valley Face project

also addressed fragmentation issues on EA pages 3-183, 3-184, 3-185 to 3-3-187, 3-189 to 3-190, and 3-191, and in Exhibits Rg-7 “[Forested] Connectivity within and beyond the Valley Face Analysis Area,” Q-7 “Old Growth Patch Size, Perimeter, and Distribution Metrics, Existing Condition and Effects Analysis,” and Q-10 “High-contrast edge along Old Growth Habitat, Existing Situation and Effects Analysis.”

**Issue 31.** *In fact, the Valley Face EA fails to demonstrate project area consistency with the LCAS standards, both programmatic and project-level... As the Flathead NF has not yet proved it is in compliance with its old-growth standards or adequately dealing with forestwide old-growth declines, the project is not in compliance with the LCAS.*

Suggested remedy: None

**FS Response:** Pages 224-229 in the EA analyze the potential project effects on lynx. Effects to lynx are also discussed in the “Old Growth” and “Snags and Downed Woody Material” sections of the EA and in Exhibit Rg-9. Pages 250-252 discuss the consistency of Alternative C with the LCAS. The USFWS concurred with the conclusion of the project wildlife biologist that this project “may affect, but is not likely to adversely affect” the Canada lynx.

**Issue 32.** *The EA did not consider the uncertain and precarious population status of the fisher, as described in Witmer, et al., 1998: ...the extensive logging, snag removal and other activities associated with the proposed project would negatively affect fisher habitat. Movement, denning, resting areas, genetic diversity, and other aspects of fisher life cycles and fisher survival could be impacted by the project.*

Suggested remedy: Jones (undated) and Johnsen, (1996) provides examples of beginning developments of conservation strategies for the fisher, something the FS has so far neglected for this Sensitive species.

**FS Response:** The EA analyzes the status of the fisher and potential project effects on the species beginning on page 231. The analysis relies on the current scientific research regarding the species, including Witmer et al. 1998. The analysis concluded that the project may impact individual animals or their habitat but would not likely result in reduced viability for the population.

**Issue 33.** *The EA does not adequately consider cumulative effects on upland habitat for boreal toads. This does not make sense, since such small populations that are likely to persist are especially susceptible to fragmentation and extirpation due to isolation of smaller populations. See Maxell, 2000. In fact, the EIS has no genuine analysis of cumulative impacts of logging activities on boreal toads at all.*

Suggested remedy: None

**FS Response:** The aquatic species section of the EA considers the status within the analysis area of amphibian species including boreal toads. Their status forest and region-wide is considered in the document “Flathead National Forest Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities” (Exhibit Rg-1).

**Issue 34.** *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.*

Suggested remedy: None

**FS Response:** The Sensitive, Threatened, and Endangered Species section of Chapter 3 in the EA considers cumulative effects on all sensitive wildlife species. In addition, the document “*Flathead National Forest Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities*” (Exhibit Rg-1) considers the status of sensitive species forest and region-wide.

**Issue 35.** *The EA fails to adequately analyze and disclose the habitat value that all treatment units areas presently have for old-growth associated wildlife species. In other words, what are the units’ old-growth characteristics? The EA fails to disclose the analysis area used to consider old growth in the project area, and how well the designated and effective old growth is distributed across this management unit.*

Suggested remedy: None

**FS Response:** The EA devotes 13 pages to a discussion of old growth forest in the project area. This analysis includes discussion of the old growth value of stands proposed for treatment (none under Alternative C) and adjacent to proposed units. Page 183 of the EA clearly defines the old growth analysis area as the project area as displayed in Figure 1-1. The Sensitive, Threatened, and Endangered Species section of Chapter 3 in the EA considers project effects and status of many old growth associated wildlife species. Exhibit Q-11 contains detailed information on the old growth characteristics of the proposed units.

**Issue 36.** *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. Minimum viable population numbers, as required by NFMA, have not been determined. The EA is also unable to cite the results of required Forest Plan monitoring, which if actually carried out would provide some indication of population trends in response to Forest Plan implementation.*

Suggested remedy: None

**FS Response:** The Sensitive, Threatened, and Endangered Species section of Chapter 3 in the EA considers the status of each species listed in those categories. The section of the EA devoted to Commonly Hunted Big Game discusses the status of three MIS species: white-tailed deer, mule deer, and elk. The Aquatic Species section considers boreal toads, bull trout, and westslope cutthroat trout, and the Sensitive Plants section includes analysis of the status of water howellia. Exhibits Q-16, Rb-10, Rd-11, Rn-4, Rr-4, and Rs-5 include the results of wildlife monitoring in the project area. In addition, the document “*Flathead National Forest Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities*” (Exhibit Rg-1) considers the status of sensitive species forest and region-wide.

**Issue 37.** *For the proposal to be consistent with the Forest Plan, enough habitat for viable populations of old-growth dependent wildlife species is needed over the landscape. Considering potential difficulties of using population viability analysis at the project analysis area level (Ruggiero, et. al., 1994), the cumulative effects of carrying out multiple projects simultaneously across the Salmon NF makes it imperative that population viability be assessed at least at the forestwide scale (Marcot and Murphy, 1992).*

Suggested remedy: None, for either the Flathead or Salmon NFs.

**FS Response:** Please see the response to Issue #35 above. In addition, the document “*Flathead National Forest Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities*” (Exhibit Rg-1) considers the status of old growth dependent species forest and region-wide.

**Issue 38.** Also, *temporal* considerations of the impacts on wildlife population viability from implementing something with such long duration as a Forest Plan must be considered (*id.*) but this has never been done by the Flathead NF. It is also of paramount importance to monitor population during the implementation of the Forest Plan in order to validate assumptions used about long-term species persistence *i.e.*, population viability (Marcot and Murphy, 1992; Lacy and Clark, 1993).

Suggested remedy: None

**FS Response:** The EA discusses the temporal implications of the proposed activities in the individual species sections of the “Sensitive, Threatened, and Endangered Species” section. Population viability for these species is analyzed in the document “*Flathead National Forest Evaluation and Compliance with NFMA Requirements to Provide for Diversity of Animal Communities*” (Exhibit Rg-1).

**Issue 39.** 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. Unfortunately, the entire issue of BMPs has been repeatedly clouded by the FS. The Lolo NF and Northern Region Office have admitted that during even large-scale projects, not all problem sites are restored up to BMP standards (Lolo BMP Memo), thus allowing chronic, persistent watershed damage to continue indefinitely. This was not considered in cumulative effects analyses in the EA.

Suggested remedy: None

**FS Response:** The objector does not identify the “severely damaged streams” referred to in this objection issue. No streams in the project area are listed on the Clean Water Act 303(d) list as impaired or failing to meet all beneficial uses. Exhibits H-20 and H-21 discuss the BMP criteria employed on the FNF and past monitoring of their effectiveness when implemented.

## II. HFRA specific concerns related to this project.

**Issue 40.** 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.

Suggested remedy: The proposal would conceptually be much more scientifically sound in adopting the Community Protection Zone (Nowicki, 2002).

**FS Response:** The Valley Face project focuses on reducing fuels on national forest land within the project area. Treatments on a landscape level will affect fire behavior, increase success of fire suppression and assist in protecting private property. Nowicki states, “additional thinning beyond the home ignition zone may enhance the ability of firefighters to safely defend community space.” The Wildland-Urban Interface used in this analysis is well defined as that mapped in the Flathead County Community Wildfire Fuels Reduction/Mitigation Plan (Exhibit U-2) as stated on page 7 and demonstrated at Exhibit U-5. Page 25 of the EA also explains the rationale for not fully developing an alternative that only treats fuels in Nowicki’s Community Protection Zone.

**Issue 41.** The EA also fails to demonstrate consistency with the applicable portions of the Healthy Forest Restoration Act. Many portions of that Act deal with old growth, collaration, fuel level determination, and procedures for preparing HFRA projects. It seems that the preparers of this project have not read the Act and are merely using the shortcut procedures at 36 C.F.R. 218 that the Act apparently allows to bypass the normal public process.

Suggested remedy: None

**FS Response:** The Valley Face Fuels Reduction Project was developed to fully comply with the Healthy Forests Restoration Act. Page 9 of the EA briefly summarizes how the project complies with the primary components of HFRA. Compliance with the applicable sections of HFRA is discussed in greater detail in the Public Participation section of Chapter 1 of the EA; the alternative development and description sections of Chapter 2, and the individual resource sections in Chapter 3.

**Issue 42.** *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...*

Suggested remedy: ...an EA or more preferably, and EIS must be written to adequately deal with all these issues.

**FS Response:** Chapter 2 of the EA describes in detail the design criteria and mitigation measures that would be employed during project implementation to prevent significant impacts to the environment. The interdisciplinary team of resource specialists has considered the potential effects that would result from implementation of the alternatives and determined that an EA is the appropriate level of analysis for the project. The rationale for this determination will be further documented in the Decision Notice and FONSI prepared for the project.

**Objector(s): Josiah Maddock, Katie Maddock, Tyana Maddock (Portland, Oregon)**

**I. Violation of environmental laws, regulations and policy.**

**Issue 1.** *We would like to take this opportunity to object, in the strongest manner possible, to Alternative B. This alternative includes heavy commercial logging in 3 different locations immediately bordering or in visual range of our land and would be completely unacceptable to us. Alternative B would destroy our property value, have a drastic and negative effect on local wildlife, and have a severe and terrible effect on the views and general aesthetic of our home and our land.*

Suggested remedy: Alternative C we found to be a marked improvement over Alternative B....

**FS Response:** Alternative C with some modifications is the Selected Alternative.

**Issue 2.** *...although we still feel that it (Alternative C) did not go far enough in addressing some issues.*

Suggested remedy: We would like unit 21 on this alternative to have much heavier retention and to preferably be touched not at all.

**FS Response:** Reducing fuels in Unit 21 is considered important as part of a landscape approach to reducing the risk of severe wildland fire reaching the more densely populated areas to the east. This unit is also within the high priority fuel reduction area identified in the Flathead County Community Wildfire Fuels Reduction/Mitigation Plan by the West Valley Fire District. Modifications to prescriptions and deletion of units from the Proposed Action (Alternative B) to the treatments in the Preferred and Selected Alternatives in the vicinity of Unit 21 were designed in response to collaboration with landowners in the Mountain Meadows area. We believe these changes represent a reasonable compromise between the larger community's desire for fuel reduction and the objector's concerns with the impacts to visual and wildlife resources.

## II. HFRA specific concerns related to this project.

No HFRA Objections.

### **Objector: Laurie Gaiser (Whitefish, Montana)**

#### **I. Violation of environmental laws, regulations and policy.**

**Issue 1.** *Both of the alternatives have retention levels that are too low. The extensive use of commercial logging is also a concern.*

Suggested remedy: I would like to have Alternative A, the NO ACTION proposal be implemented.

**FS Response:** The rationale for the various retention levels are presented in the “Vegetation” and “Fire and Fuels” sections of the EA. The retention levels were chosen in order to meet the Purpose and Need identified for the project in Chapter One of the EA and to move the stands toward a more shade intolerant, fire resistant species composition. Selection of Alternative A would not meet the Purpose and Need of the project.

**Issue 2.** *I feel that the amount of slash created from these clearcuts will increase the potential for high severity fires for years to come. The lack of crown cover will also reduce the soil moisture which can have a substantial impact on the intensity and spread of a fire.*

Suggested remedy: I would like to have Alternative A, the NO ACTION proposal be implemented.

**FS Response:** There are no clearcuts planned for the Valley Face Fuels Reduction Project; the slash generated within treatment units would be treated to achieve the fuel reduction goals as described in the “Fire and Fuels” section of the EA. The objector raised similar issues in comments on the project; please refer to comments 13, 14, and 23 in the “Response to Comments” document, Exhibit C-119, in the project record.

**Issue 3.** *The extensive use of commercial logging will create bare soils which will become favorable environments for noxious weeds and brushy undergrowth.*

Suggested remedy: I would like to have Alternative A, the NO ACTION proposal be implemented.

**FS Response:** The “Invasive Plants” and “Soils” sections of the EA discuss at length the protections, mitigations, and treatments that would be incorporated into any project actions to protect the soil resource and limit the introduction of noxious weeds.

**Issue 4.** *The Valley Face Fuels Reduction Project does not manage the forest for the future. There is no sustainability as reforestation is not an objective of the project. The project is single-minded, directed only at fuel reduction yet considering the above objections it does not accomplish that directive.*

Suggested remedy: I would like to have Alternative A, the NO ACTION proposal be implemented.

**FS Response:** Page 65 of the EA states: “All stands with seed tree or shelterwood harvest would be regenerated, either naturally from seed provided by onsite seed trees or artificially with transplanted seedlings.” All other treatment prescriptions would leave fully stocked stands. The goal of the fuel reduction activities is to shift the composition of treated stands toward more shade intolerant, fire

resistant species, similar to what would be expected in a mixed-severity fire regime zone without fire suppression effects.

## II. HFRA specific concerns related to this project.

No HFRA Objections.

### **Objector: Stephen Braun (Kalispell, Montana)**

#### I. Violation of environmental laws, regulations and policy.

**Issue 1.** *The VFFRP purposely excluded fuel reduction planning around homes as a component of any alternative. Fuel reduction around homes is the best way to protect property. So why is this not this addressed?*

Suggested remedy: None

**FS Response:** The Fire and Fuels section of the EA discusses the importance of reducing fuels around homes in several places, including on page 107. The Forest Service has no authority to treat fuels on private lands but does encourage private landowners to treat fuels on their property. The purpose of the Valley Face Fuels Reduction Project is to treat fuels and forest health issues on NFS lands.

**Issue 2.** *This project has no road decommissioning and instead plans for over 4.8 miles of low grade road improvement and new roads. The road density on the Tally Lake District, not counting private roads is presently very high. A road decommissioning plan and no new roads being built should be integrated in the VFFRP.*

Suggested remedy: A road decommissioning plan and no new roads being built should be integrated in the VFFRP.

**FS Response:** Neither action alternative includes the construction of any new permanent roads in the analysis area. Alternative C, the Preferred Alternative, would allow the construction of approximately 3.5 miles of temporary road to access units; these roads would be restored following completion of the treatments. Five currently existing unauthorized road segments totaling 1.3 miles would also be rehabilitated and rendered impassable. A total of approximately 40 miles of existing road would also receive BMP upgrades to improve drainage and prevent erosion. The overall road density of the Valley Face area would be decreased after completion of the project due the rehabilitation of the unauthorized road segments. Road decommissioning would not help meet the purpose and need to the project.

**Issue 3.** *I do not find that the chosen treatments will make my house safer, but instead create conditions that speed the spread of fire. Most fuel reduction treatments will create sites that will be drier, promote weed invasion, promote illegal ORV use, change wildlife habitat for years in a negative manner, dry the sites and allow for faster burning fires that will be harder to contain.*

Suggested remedy: Limit treatments to stricter diameter limits of all tree species for removal to 8" dbh. Remove from plan all treatments that are clearcuts, meadow creation or regeneration harvests.

**FS Response:** The Fire and Fuels analysis in the EA relies on scientific research that documents the effectiveness of fuel reduction treatments at reducing fire severity. The treatments proposed in the Valley Face area would reduce fuel loads and crown bulk densities (pp. 111-121), measures that have been

demonstrated to reduce the risk of a crown fire occurring. Limiting treatments to trees of 8 inch DBH or less would not reduce crown bulk densities and the volume of ladder fuels sufficiently to provide adequate resistance to the development of a crown fire. There are no clearcuts or “meadow cuts” in the Valley Face Fuels Reduction Project; however, regeneration harvest is proposed in some units to meet fuels and forest health objectives.

**Issue 4.** *Snags are a very limited resource in the VFFRP area and treatments need to respect these snags. There should be no treatments that will compromise the snags.*

Suggested remedy: This means that all treatments will stay away from snags.

**FS Response:** The Valley Face EA recognizes the value of snags as habitat for wildlife and a source of soil organic matter (see the Snags and Downed Woody Material and Soils sections of the EA). The project would prohibit the removal of all larch and ponderosa pine snags greater than 18 inches DBH, and all Douglas-fir snags greater than 25 inches DBH. If any of these snags are felled for safety reasons, they must be left on site. The Valley Face Fuels Reduction Project is designed to be fully compliant with all Forest Plan standards regarding snags and downed woody material.

**Issue 5.** *The USFS has analyzed effects of this project on white-tailed [deer]. It has not addressed the cumulative effects on the deer population by all effects that are presently happening.*

Suggested remedy: None

**FS Response:** The “Commonly Hunted Big Game” section of the EA considers the effect to white-tailed deer of project activities and other ongoing impacts in the analysis area. See also table 3-1, which lists the various activities and management actions that were considered by all resource specialists serving on the ID Team.

**Issue 6.** *[Elk] Hunting security levels are not at 30% as is recommended and no projects should be planned that further reduces the security areas.*

Suggested remedy: No new roads should be planned because roads reduce elk habitat.

**FS Response:** This project will not increase motorized trail or road access. No new system roads will be constructed and all temporary roads will be closed to public motorized use.

**Issue 7.** *Weeds: weeds are a growing problem in the VFFRP area and all projects areas need to be designed to not introduce more weeds. Changing canopy cover levels will only dry the sites and facilitate weed spread.*

Suggested remedy: None

**FS Response:** Please see the “Invasive Plants” section of the EA for a description of the weed monitoring and treatment plan that would be implemented in the Valley Face Fuels Reduction Project. The FNF is committed to preventing the spread of weeds on NFS lands.

**Issue 8.** *No Old growth parcels should have any treatment in them.*

Suggested remedy: Projects adjacent to all old growth need to be dropped or have large setbacks to limit future negative edge effects.

**FS Response:** The EA considers the potential effect of all proposed activities on old growth and old growth-associated wildlife. Alternative B proposed some hand treatments in old growth stands, but the

Preferred Alternative (C) does not treat in old growth. In addition, most old growth adjacent to proposed treatment units is buffered to reduce edge effects.

**Issue 9.** *There is a very large remnant larch on Twin Lakes Road that is in unit 27 below the road. There are very few trees like this. This tree is used by a variety of wildlife. Unit 27 is a major wildlife corridor. I have seen mountain lion, bear, bob cat, deer, a wolf, and a host of raptors, etc use this area. The corridor heads north of Twin Lakes Road toward Boot Jack Lake.*

Suggested remedy: Please drop this area from the planned treatment.... I request that this area is removed from the planned MDR treatment.

**FS Response:** Unit 27 below Road 2922 was dropped from the Selected Alternative to protect this wildlife tree and the surrounding wildlife habitat. This portion along with the draw immediately to the west is expected to function as a forested corridor for wildlife.

**Issue 10.** *I feel that I could give more and more examples why this project should have a finding of significant impact. The plan does affect over 3300 acres. This is a large scale plan.*

Suggested remedy: None

**FS Response:** The ID Team, comprised of resource specialists representing the entire range of natural resources found in the project area, determined that the implementation of an action alternative would not have a significant impact on the environment. The rationale for this determination was based upon the consideration of direct, indirect, and cumulative effects for each resource as documented in the EA. The Decision Notice and Finding of No Significant Impact for the project will provide additional insight into the rationale for the determination.

**Issue 11.** *It is important to protect all large trees, regardless of species.*

Suggested remedy: Cutting any large tree should be restricted. A 28" Douglas fir is a large fire resistant tree and should not be harvested.

**FS Response:** Chapter Two of the EA describes the diameter limits placed on harvest of larch, ponderosa pine, and Douglas-fir trees. A 28" Douglas-fir would not be felled unless it presented a serious safety hazard, and even if felled it would not be removed from the site.

## II. HFRA specific concerns related to this project.

**Issue 12.** *After partaking in all announced open houses, the field trip and talking to forest service staff, I do not see where the collaboration process was. Is public participation now called collaboration?*

Suggested remedy: ...educate the USFS Professionals that they are there to hear public comment and not stop public comment. Also it is important for the USFS Professionals to understand that the public funds their position and pays for bad decisions and below cost timber sales.

**FS Response:** The Tally Lake District Ranger has made collaboration with the public a high priority on Healthy Forests Restoration Act projects like the Valley Face Fuels Reduction Project. Chapter One of the EA describes in detail the collaborative efforts and public outreach measures that were incorporated into the Valley Face project. Input that we received from members of the public, including this objector, were integral to the development of Alternative C, the Preferred Alternative.

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