

Public Comments and Forest Service Responses

This section includes comments received during the scoping period of the proposed action and the responses to those comments by Forest Service resource specialists. Thirty-nine individuals or organizations commented during the scoping period, which ended July 26, 2005. The comments displayed below are summarized and paraphrased from the complete set of letters and content analysis found in Project File Exhibit C. Comments are organized by an alphabetical listing of resource areas.

Air Quality

1. I live in a location where I will be alert to smoke when you burn. Are there plans to notify homeowners when burning will occur?

FS Response: An effort is made to notify adjacent land owners of plans for pile burning and prescribed fire activities. Additionally, prescribed fire activities are put in the public notice section of local newspapers. All burning activities on the National Forest adhere to air quality guidelines as outlined by the 1970 Clean Air Act. Further consideration for air quality standards are met by following the State Implementation Plans (SIP's), which are designed to implement the provisions of the Clean Air Act. Flathead county has additional open burning restrictions and a ventilation hotline that the Flathead National Forest complies with in addition to the state and federal regulations.

Economics

2. Will a cost benefit analysis be part of this review?

FS Response: Yes, please refer to the Economics section of Chapter 3 in the EA.

3. The second largest industry in Montana is tourism. When will the USFS stop doing projects that harm this industry?

FS Response: We do not believe this project harms the tourism industry. In fact, this project may be beneficial to the tourism industry as a result of reducing the potential for large-scale wildfires. The tourism industry in Montana was highly affected by the large fire years of 2000 and 2003 when many tourists bypassed Montana as a tourist destination. Activities associated with the Valley Face project are not in high tourist use areas and do not detract from tourist use of National Forests.

4. If this will be a taxpayer subsidized project, please do projects that will truly benefit the taxpayer.

FS Response: We believe the proposed activities would truly benefit the citizens of the United States by managing for healthy ecosystems and reducing the potential for destructive wildland fires.

5. The economic loss to private timber assets from wildfire could be huge; these lands deserve equal consideration with other private property.

FS Response: Several fuel treatment units included in Alternatives B and C would address this concern by reducing fuel along the private boundaries shared by private timber companies. This fuel reduction would slow the advance of wildfire and allow for suppression activities to be conducted on the national forest before fires spread to private property. Other areas along these boundaries were found to have fuel characteristics that would benefit from treatment, but it was determined that many of the stands affected by this approach are old growth and therefore not suitable for the level of treatment needed to conduct effective fuel reduction.

Please refer to the section of Chapter 2 in the EA that discusses alternatives considered but eliminated from detailed study.

6. By far, since the bulk of firefighting dollars go toward the protection of dwellings, the emphasis of this timber project should be to actually reduce hazard to private dwellings and should include state, local, and federal land management agencies. Collaborative fire hazard reduction plan could include, at the least: Cooperative development of stewardship-oriented prescriptions in populated areas on public and private lands that actually reduce fire hazard to homeowners. Fire wise education for landowners; Development of evacuation plans for neighborhoods accessed by winding, one-lane gravel roads.

FS Response: The US Forest Service cannot modify home ignition characteristics on private land. However, we are collaborating with state, county, and private groups to assist in grant development for fuels reduction treatments on private lands. The Forest Service does not have the authority or responsibility to upgrade roads for private access and use. However, the Forest Service can provide homeowners with information on how to upgrade roads, but we cannot legally use Forest Service money for private access needs. Home owners can be issued a road use permit to upgrade access roads at their expense.

7. I would hope this project would provide some work for local businesses.

FS Response: The majority of the jobs created with this project would be related to timber harvesting and processing. These jobs are contracted with individuals and companies who demonstrate the greatest value to the government, and have historically been those based in or near the Flathead Valley. See the Economics section of Chapter 3 in the EA.

8. Commercial interests seem to far outweigh a healthy, balanced proposal.

FS Response: The proposed action and its alternative were developed to meet the stated purpose and need. Activities to meet these needs are both commercial and non-commercial. Commercial activities were selected as the method that best meets the purpose and need in terms of value to taxpayers and to achieve desired results. All activities are designed to improve forest health and reduce the likelihood of high-severity wildland fire.

Fisheries

9. Our goals for the area include fully functioning stream ecosystems that include healthy, resilient populations of native trout. The highest priority management actions in the project area are those that remove impediments to natural recovery. We request the FS design a restoration/access management plan for project area streams that will achieve recovery goals.

FS Response: A native fish recovery plan is not part of the purpose and need of the project. As described in the EA, it is unlikely if any streams within the project area ever had native trout to begin with. However, it is possible that a small population of westslope cutthroat trout existed in Lost Creek and may still be present. Lost Creek has not been identified as a priority for native trout restoration by any fisheries management agency.

10. In claiming that the proposal addresses "forest health" the FS misplaces the threats instead of correctly identifying the true threats to watershed health. The Western Montana Level I Bull Trout Team (Riggers et al., 2001) state: (The real risk to fisheries is not the direct effects of fire itself, but rather the existing condition of our watersheds, fish communities, and stream networks, and the impacts we impart as a result of fighting fires. Therefore, attempting to reduce fire risk as a way to reduce risks to native fish populations is really subverting the issue. If we are sincere about wanting to reduce risks to fisheries associated with future fires, we ought to be removing barriers, reducing road densities, reducing exotic fish populations, and re-assessing how we fight fires. At the same time, we should recognize the vital role that fires play in stream systems, and attempt to get to a point where we can let fire play a more natural role in these ecosystems. We ask that the FS explicitly respond to Riggers et al., 2001 in your subsequent NEPA document.

FS Response: We agree that wildland fires do indeed play a role in stream ecosystems. The purpose and need of the project does not purport that fuels reduction would improve watershed health for fisheries. As reviewed in the Aquatic Resources section of the EA, there are advantages and disadvantages to reducing fuels in the project area. The actions that reduce risk to trout populations are disclosed in the Environmental Consequences section.

11. Please disclose in the NEPA document the results of up-to-date monitoring of fish habitat and watershed conditions, as required by the Forest Plan.

FS Response: The Aquatic Species and Water Resources sections disclose the status of fish habitat and watershed conditions.

12. The EA/EIS must consider an alternative that gets the streams in the project area to meet RMOs.

FS Response: Moving streams to meet all RMOs is not part of the purpose and need. The EA discloses the existing condition of RMOs and the effects of the alternatives.

Fuels

13. The 5-30% tree cover retention is indiscriminately addressing these parcels relating to crown fire, but does not consider the understory growth that exists now or will regenerate after logging.

FS Response: The retention level, as well as the current understory and possible regeneration was addressed in the vegetation section of the Valley Face EA. Regeneration units were chosen to shift the stand composition away from fire intolerant species towards more fire tolerant species including ponderosa pine, Douglas-fir, and western larch. These trees are also shade-intolerant, which makes a retention level of 5-30% desirable to establish these species. The Fire and Fuels section of Chapter 3 in the EA discusses the effects of understory growth after treatment on wildland fire behavior.

14. I am concerned that the slash piles will not be removed or burned and create access problems and higher fuel loads.

FS Response: The slash piles will be burned within one to two years of their creation. On occasion a pile is left for wildlife concerns; these are generally infrequent, and not in areas where access would be compromised.

15. I question the economic viability of piling and burning slash in pre-commercial thin units; an alternative might be treating the perimeter of units to create fuel breaks.

FS Response: We agree that piling and burning an entire unit verses a perimeter of a unit would be more expensive. Because a purpose and need of the Valley Face project is fuels reduction on a landscape level, fuels treatment that only focused on the periphery of stands would have little effectiveness at that scale. To only treat the perimeter of fuels reduction units would not meet our purpose and need. Also see the response to comment #30.

16. Don't just treat units; treat whole stands including stands adjacent to industry-owned timber lands.

FS Response: Entire stands of similar overstory trees were very often included as proposed treatment units. This was not always possible due to the stand's proximity to riparian areas or other values needing adjacency to untreated vegetation. Several units included in Alternatives B and C would partially address treating stands adjacent to industry-owned timber lands, but it was determined that many of the stands affected by this approach are old growth and therefore not suitable for the level of treatment needed to conduct effective fuel reduction.

17. What consideration is being given in this review to current and future drought conditions and how timber removal may increase the dryness and fire prone nature of this project area?

FS Response: Trees stressed due to the lack of moisture are more susceptible to insects and disease. The continued mortality in these trees contributes to the fuels problem. Increasing the availability of nutrients and soil moisture increases stand vigor, thus allowing trees increased defense against drought. This is done by reducing the number of green trees. Fewer trees mean more moisture would be available per tree. More moisture per tree enables the remaining trees to better defend themselves against insects and disease. Please reference the Fire and Fuels section of the EA. Please also see the response to comment #13.

18. In proposing to protect private property and human health and safety from wildland fire destruction, we ask that you adopt the concepts of Community Protection Zone and Home Ignition Zones (Nowicki, 2002). The Community Protection Zone is an overlapping area where vegetation manipulation can provide opportunities for firefighters to protect other flammable features of a community (Nowicki, 2002). Most communities require treatment extending less than 400 meters (1312 feet) from the house (Id.).

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." Please see the response to comment #15 and #30.

19. According to Forest Service studies the logging of more than 60% of trees in a given acreage increases the risk of and damage from wildfire within five to ten years.

FS Response: It is correct that the amount of subsequent vegetation regeneration will increase proportional with the amount of canopy removed. However, this project is designed to regenerate trees with more fire tolerant species, thus converting some currently fire intolerant stands. Brush species that regenerate after timber harvest in the Northern Rockies are typically those that are not easily burned and present little risk of wildfire spread. Future stand tending treatments, such as precommercial thinning, may be employed when and where necessary to maintain density and species composition objectives.

20. We are opposed to the use of fire for cleanup in our area, as the fuel load seems quite heavy and the terrain adjacent to our property is fairly rugged.

FS Response: Units considered for fuels treatments have been carefully selected. Input from specialists, site visits, and stand data were used to design treatments. In an area of heavy fuel loading fire will not be the sole form of fuels treatment; there may be mechanical or hand treatment along with pile burning. Pile burning is conducted within the parameters of the state and federal regulations and when risk of fire escape is extremely low, generally in the fall while snow is on the ground. Extreme caution and consideration of fire hazard is used by the professionals burning piles.

21. What volume of slash will remain on the ground? Is there a long-term plan to brush out volatile understory regrowth in the future?

FS Response: Typical volume will range from 10 to 15 tons per acre after treatment; please reference the Fire and Fuels section of the EA. We recognize the importance of maintaining existing treatment areas. Long-term plans to maintain understories are addressed above in question number 19.

22. I am hoping that there will be a set plan for cleanup that will allow the forest to regain its beauty quickly.

FS Response: Prescriptions and plans outlining disposition of slash and regeneration of desirable tree species are prepared for each unit. Slash generated from the fuels treatments will

be removed from the site or piled and burned. Slash from these treatments may be left on site for one wet season which allows for nutrient cycling. After this process, slash is piled and burned. Typically stands recover the shrub and grass component within two years of treatment. Please refer to the Visual/Scenery section of Chapter 3 in the EA for a discussion of visual impacts of proposed activities.

23. The BLM in Medford, Oregon recently released a study that showed a 60% retention level as most beneficial in retarding understory growth and retaining moisture content.

FS Response: Opening up a canopy does make seedling establishment more likely. The Valley Face project has proposed treatment units (mostly seedtree and shelterwood) that would have a 5-30% retention level. In these instances this type of treatment was necessary to accomplish our management goals. To shift these stands from fire intolerant species to more fire tolerant species, regeneration is necessary. Please see the response to comments 13 and 17 above.

24. If the homeowners in adjacent areas have not created defensible space on their property, how does that affect your fuel reduction in that area?

FS Response: When private and public lands are treated, the fuel reduction area creates a larger patch of treated area on the landscape. Treatments on Forests Service land will have varying degrees of effectiveness based on the intensity of the treatment and the intensity of the fire. A more intense treatment (seedtree, shelterwood) will have a greater effect on reducing crown fire potential, even in hot and dry conditions. Please also see the response to comment #30.

25. Thinning of trees will not stop a forest fire. We don't expect the Forest Service to save our homes.

FS Response: Many components make up a successful fire suppression operation. The public's expectations vary widely on whether or not the Forest Service is expected to protect private dwellings. Some private land owners fully expect the Forest Service to defend their homes in the event of an advancing fire front. Our current congressional direction is to focus on treating areas with fuels concerns within the urban interface. We do not have authority for structure protection.

26. Don't get over zealous on your prescribed burning. Often burns are too hot and kill many of the remaining trees.

FS Response: Four units in each alternative are proposed for regeneration harvests on steep slopes. Proposed slash treatment in these four units is for broadcast underburning. Additionally, five to seven other units are proposed for jackpot burning during pile burning operations. Leave trees in these areas are expected to be larger diameter, thick-barked larch and Douglas-fir that have a good chance to survive the burning. Sites will be evaluated after harvest to determine the need for burning and prescribe burning conditions that will protect as many remaining trees as possible. Units will have pile burning to remove slash from the treated area. Occasionally, mortality will occur in trees next to the piles.

27. It would seem to me that retaining only 10-30% tree cover is quite meager and possibly a dangerous step in promoting the growth of understory fuels.

FS Response: Please see the responses to comment number 13, 17, and 23.

28. You cannot reduce the risk of crown fires without reducing ground and ladder fuels. It makes sense to be as concerned about the understory fuels and slash as the crown fire potential, especially near private lands.

FS Response: The Valley Face project addresses both overstory, understory, and contractor created slash. A purpose and need of this project is fuels reduction in the urban interface.

29. Looking at how we've managed the forests in the past tells us that more of the same is in store--cut the big trees, let the understory grow and become fuels.

FS Response: The Forest Service does not focus on one type of management. Many considerations go into the development of these treatment areas, including: current stand structure, species diversity, desired species, location, topography, and objectives of the project.

30. Cohen has reported that home ignitability, rather than forest fuels, is the principal cause of home loss during wildfire, and concludes that the area immediately adjacent to the home is the critical area for fuel reduction.

FS Response: The suggestion to limit the proposed fuel reduction treatments to a few tens of meters to less than 400 meters from homes was not considered in detail for the following reasons:

1. Treating only near individual home sites on a limited basis does not fully meet the intent of breaking up fuel continuity generally within the Project Area to allow firefighters to more safely, tactically, and strategically address a fire in the interface area. Such an alternative would limit the ability of fire fighting efforts to more effectively and safely fight a fire in the area as a whole.
2. Such an approach would leave significant areas of fuel buildup and dense canopies with ladder fuels within the wildland urban interface area. As described above, leaving such stand conditions untreated would limit options that firefighters would have for safely stopping a moving fire within the interface area, and would leave many areas where crown fire potential could have been reduced within the urban interface untreated. Bypassing the opportunity to treat such areas would not be consistent with the purpose of the project.
3. Research has determined that treatments intended to reduce fuels around communities at risk, rather than individual structures, need to go beyond the home ignition zone (Graham, 2004). While individual home-by-home treatments can help reduce the risk of loss of individual homes, relying solely on such treatments would forego strategic opportunities for controlling fires within this wildland urban interface area.
4. Limiting treatments to a smaller area immediately adjacent to homes or structures would only allow for a small subset of the interface area to be treated in the Project Area. In addition, it would not meet the broader purpose of the proposal in treating fuels in the wildland urban interface area.
5. The proposed fuel reduction treatments are consistent with management actions recommended in the Community Wildfire Protection Plan for Flathead County Montana (January 2005) for defensible space around individual homes, reduction of fuels at the neighborhood or subdivision level, and the thinning and biomass removal in the landscape adjacent to WUI to help limit wildfire intensity and rate of spread (Exhibit O-4).

31. How was it determined where the units were placed and what treatments were chosen?

FS Response: The interdisciplinary planning team completed a landscape assessment that showed needs and opportunities to treat stands with high fuel loads, high proportions of shade tolerant and fire intolerant trees, and high current levels or susceptibility to bark beetles. Field examination data (stand exams), aerial photos, knowledge of the stands, and field reconnaissance were used to determine which stands had one or all of these conditions. The locations of these stands were evaluated to determine their value or potential for effective fuel reduction. Two primary criteria related to fuels reduction determined the location of stands proposed for treatment: 1) directly adjacent to private land, especially of the west side, 2) strategically located farther from private land where treatment could allow for safer, more effective fire suppression if a fire were to come from the west. The type of treatments was

determined by the existing stand conditions, location, and concerns and requests expressed by the public and resource specialists. See EA Chapters 1 and 2; Chapter 3, Fuels and Vegetation sections; and Exhibit P-15.

32. A new road proposed in parcels 40 and 41 is not necessary. These three parcels do not appear to be a fire hazard as there are no homes or private structures nearby.

FS Response: Units 40 and 41 have current Douglas-fir beetle activity and mortality from increased populations over the last 5 years or so. Unit 41 is adjacent to the Tally Lake road. There is potential for human-caused fire from the road to cause high mortality of the large trees in this stand and Unit 41. Both units are directly east of the Tally Lake basin where there are many dead trees from bark beetles and root disease. Treating units 40 and 41 would reduce the bark beetle populations and potential in those stands. It would reduce the fuels and open the stands so they could survive a low-severity fire. This area could then serve as a fuel break or allow for effective fire suppression between the Tally Lake area and the private lands to the east. If a fire burned through, there would be little potential for it to become a crown fire or for it to kill the remaining large larch and Douglas-fir. In response to the concern expressed in this comment, Alternative C does not include the temporary road, Unit 40, and the upper part of Unit 41.

33. What studies do you have that prove forests managed with light and moderate retention do help slow and hinder fire spread?

FS Response: The units in the Valley Face project area were analyzed on a stand by stand basis and before and after fire behavior characteristics were modeled. As stated by Graham (1993), "The primary stand attributes that control a fire's behavior are surface fuel condition, crown bulk density, and crown base height. All three attributes can be directly managed by thinning or other similar forest treatments." For a display of fire behavior, crown bulk density and crown base height before and after treatment, see Exhibit O-14.

34. We would like to see how fire history, logging, and thinning projects in the plan area, particularly those interfacing with private land, have already provided some potential fire and fuel reduction.

FS Response: In the past, 5807 acres have burned in large fire incidents within the analysis area between the years of 1889 and 1931 (Exhibit O-1). The bulk of these acres burned on Forest Service lands. It is estimated that at least 15,159 acres of treatment occurred on private and Forest Service land. For a more detailed discussion, see the fuels and vegetation sections of the Valley Face EA.

35. This project appears to create the potential for larger fires. Commercial logging will not provide fire protection

FS Response: Any time fuel is removed from a stand, the fuel load is reduced. Reducing the fuel load will also decrease fire intensity as well as the potential for large fire growth. It should be considered that reducing fuel load will not always reduce the rate of spread; fires in a fuel model 2 will typically burn at a faster rate of spread than fires in a fuel model 8 or 10. Aside from removing every possible ignition source and receptive fuel, nothing ensures absolute fire protection. However, fire and fuels specialists can use fire behavior models and subject expertise to develop fuels reduction treatments that affect fire behavior and alter stand composition to that of a more fire resistant species.

36. Partridge has reported that logging forests beyond a 200' zone surrounding structures will not reduce fires, but will increase them.

FS Response: Dr Partridge's comments are not based on scientific study, but rather a testimony submitted to the agriculture, nutrition and forestry committee of the United States Senate. His

comments are based on his opinion of how public lands should be managed in relation to fire suppression and fuels reduction. However, there are numerous published studies that support lowering crown bulk densities, and raising canopy base height as ways to reduce fire severity and occurrence, especially in relation to sustaining and initiating a crown fire. For a visual display, see figures 8 and 9 of Graham et al. (1999) in Exhibit O-17 of the project file.

37. I support fuel reduction within the project area to reduce fire hazard. I encourage you to proceed as fast as you can. Time only increases the needed work to be done to obtain a healthy forest.

FS Response: We agree. Time is needed to adequately analyze the effects of the proposed activities and collaborate with members of the public on how the activities may affect them. If an action alternative is selected for implementation, activities could begin the following summer.

38. Hessburg and Lemkuhl (1999) suggest that prescribed burning alone can be utilized in many cases—possibly here—where managers typically assume mechanical fuel reductions must be used. This is particularly important to state in these comments, since the FS seems to have already rejected this option for most areas without adequate scientific basis.

FS Response: Prescribed fire is a very useful tool and should be used when it is the best tool to accomplish the objective. However, there are many things to consider when deciding to use fire as a source of reducing fuels. Primarily, will homeowners be receptive to having fire and associated smoke next to private land and homes. Often times our fuels areas are in close proximity to homes. Prescribed fire is also a difficult tool to use during periods of drought as surviving leave trees are more vulnerable to insects, disease, and other stresses.

39. In response to this scientific concern, (Veblen 2003) we ask that the FS acknowledge the limitations of its fire history methodology and disclose if it relies upon summary fire statistics such as mean fire interval and rotation period, or disclose just what the data is it's relying upon.

FS Response: This project utilized fire history information based on historic accounts and records taken from the Flathead National Forest GIS library. These maps and meta data are included in the project record. The U.S. Forest Service keeps records of all known fires. They also have historic accounts of past large fires (greater than 100 acres). There are historic accounts and physical evidence in the form of snags from past fires. There was no fire history study, such as fire scar analysis, performed in this area to determine fire history prior to 1900. The limitation of using historic accounts based on Forest Service or other records is that little data exist for the pre-1900 era. This information was not deemed critical due to the purpose and need for this project. The treatment unit locations and prescriptions are designed near private land to reduce fire behavior from fires in the future, not to mimic past fire events.

Old Growth

40. Old growth should not be entered. Old growth recruitment areas are not defined; is any old growth planned for harvest? It is our understanding that Tally Lake District has not retained a recommended percentage of Old Growth. What analysis has or will be done of this resource in the project area.

FS Response: As described in the Chapter 3 section on Old Growth Habitat and Old Growth Associated Wildlife Species, Alternative B would use timber harvest to regenerate 118 acres of rapidly deteriorating old growth habitat if the areas no longer qualify as old growth (per Green et al. 1992 (updated in 2005)) at the time of sale layout. This would occur on 59 acres in Alternative C. There would be no timber harvest in areas that qualify and function as old growth habitat. Only Alternative B would slash and hand-pile understory fuels in 126 acres of old growth habitat adjacent to private lands; none of this is proposed for Alternative C. The analysis of effects of this project on old growth habitat and wildlife species associated with old

growth included the field and data evaluation of stands as old growth habitat (Exhibits Q-1, Q-2, Q-3, and Q-11); mapping and quantification of old growth and other mature forests (Exhibits Q-5 and Q-12); old growth patch size, perimeter, and distribution metrics (Exhibit Q-7); reference conditions and past processes in old growth habitat (Exhibit Q-8); effects of proposed vegetation manipulation and temporary road construction on current old growth and uncertain old growth (Exhibits Q-6 and Q-15); analysis of new high-contrast edge on old growth (exhibit Q-10); and analysis of effects on old growth recruitment (Exhibit Q-14). Consistency with Flathead Forest Plan direction for maintaining old growth habitat is detailed in Exhibit Q-13.

41. The context of the Flathead NF's management of native forests—within the Northern Region—is important to keep in mind; unfortunately, region-wide the FS has failed to meet Forest Plan old-growth standards, does not keep accurate old-growth inventories, and has not monitored population trends in response to management activities as required by Forest Plans and NFMA (Juel, 2003). Please disclose how stands to be logged compare to Forest Plan or Regional old-growth criteria. In order to disclose such information, please provide all the details, in plain language, of these areas' forest characteristics (the various tree components' species, age and diameter of the various tree components, canopy closure, snag density by size class, amounts of down logs, understory composition, etc.).

FS Response: Region-wide conditions for old growth habitat and old growth associated species are described in project record exhibit Rg-1. The results of monitoring for landscape-level old growth habitat (A21 monitoring items #68 and 69) were reviewed and considered by the IDT and deciding official. These records are kept at the Forest Supervisor's Office, and were incorporated by reference into the Valley Face project file. See also exhibit Q-6. Information about characteristics of proposed treatment areas is found in exhibits P-3, P-4, P-15, Q-3, Q-6, and Q-11.

42. Please consider including restorative and maintenance management activities in existing old growth stands. Careful harvest can improve old growth quality habitat.

FS Response: Alternative B would manage understory fuels in 126 acres of old growth habitat adjacent to private lands. No treatments in old growth stands are proposed for Alternative C.

43. A stand between our properties is predominantly Larch with minimal brush and may be Old Growth or potential Old Growth. It would be valuable to know how such stands have been evaluated for this proposal and how they can receive additional consideration.

FS Response: The field, data, and aerial photo evaluation of stands as old growth habitat is explained and documented in Exhibits Q-1, Q-2, Q-3, and Q-11. We used the same process to evaluate stands brought to our attention that might be old growth that had been missed. Stand 810-03-093 (6 acres) was reclassified as old growth habitat in this way after public input for the Valley Face project.

Other

44. This plan should not be expedited. It will take physical viewing and study to complete a science-based plan for fuel reduction and a future healthy forest.

FS Response: We agree. Time is needed to adequately analyze the effects of the proposed activities and collaborate with members of the public on how the activities may affect them. Each of the potential vegetation treatment areas have been visited by Forest Service employees for data gathering and evaluation. Plans for treatments or deferring treatments are based on published scientific findings. Please also see the response to #37 above.

45. You have not incorporated a Wildland Urban Interface (WUI) in this project even though you have over 350 individuals of concern in your database for this project area.

FS Response: This project incorporates the WUI as described in the Flathead County Community Wildfire Fuels Reduction/Mitigation Plan. This plan along with WUI maps is located in Exhibit U-2.

46. We understand that the project has been noticed as being conducted under the Healthy Forest Restoration Act and is being coordinated with the Flathead County Community Wildfire Fuels Reduction/Mitigation Plan. Information about public participation is scarce in the documents you provided and on your web site. Please disclose the relationship between these two projects and how they will allow for further public participation. What timeframe are they operating within? How does one best track information on each of these projects?

FS Response: The Flathead County Community Wildfire Fuels Reduction/Mitigation Plan defined the wildland/urban interface, communities at risk, and priority areas for fuels treatments. The Healthy Forests Restoration Act relies upon these locally derived components through a collaborative effort to identify treatment opportunities to be conducted under the HFRA authorities. Further public participation for these two projects, the Community Plan and HFRA, are currently not planned but would be welcome if either of these two were revised in the future. There are no timeframes for the conclusion of either of these programs. The best way to track information on the Community Plan is to contact a county commissioner. The best way to track HFRA is to access www.fs.fed.us/projects/hfi/ or www.healthyforests.gov. Please refer to Chapter 1 of the EA for a complete discussion of public collaboration during this project.

47. Please utilize the NEPA process to clarify any roadless boundary issues. It is not adequate to merely accept previous, often arbitrary roadless inventories—unroaded areas adjacent to inventoried areas were often left out. Additionally, there is a lot of public support for adding unroaded areas as small as 1,000 acres in size to the roadless inventory.

FS Response: There are no inventoried roadless areas in the project area and therefore clarification of boundaries is not necessary. There are no contiguous unroaded areas in the project area greater than 1000 acres on national forest. Please see the discussion regarding Undeveloped Areas in the Recreation section of Chapter 3 of the EA and Exhibit L-2 of the project record for more details.

48. We are concerned that a statement in your letter of 6/24/2005 indicates that this project will reach a point after which the decision concerning it will not be subject to public notice, comment, or appeal. What point is that? It is not clear when public comment will be allowed and when it will not, which may significantly discourage public participation, particularly if there is no notice. To have a process that will set the course for the management of some 20,000 to 35,000 acres that interface with privately owned lands in the valley and does not have a public process that is in keeping with Montana's strong constitutional provisions for open meetings and meaningful public participation is of great concern to us. How can the system be changed to allow for full notice, open meetings, meaningful and broad public participation through out the development, analysis, and implementation of this project?

FS Response: This project was conducted under the authorities of the Healthy Forests Restoration Act. This act directed the Forest Service to collaborate with members of the public and other agencies to develop land management strategies for restoring public forests. We believe we have fulfilled this direction and documentation is located in the Public Participation section of Chapter 1 in the EA. Collaboration is invited on this project up until a decision is made. The statement in the June 24, 2005 letter refers to the Administrative Review Process specific to HFRA projects, as opposed to the notice, comment, and appeal provisions utilized in other Forest Service projects of this nature.

49. How does one access the documents, studies, models and other authority that has been used to date to develop this proposal? Can data base of resource be made electronically available now and updated as the project review continues? Where can one access the watershed analysis that was done and the recommendations from it that were disclosed in your information packet?

FS Response: This information is contained in the Project File and referenced in the EA.

50. The EA/EIS must contain a discussion of the connection between the major individual management actions carried out in the past, and the environmental harms or benefits of each of those actions.

FS Response: Past, present, and reasonably foreseeable future actions are presented at the beginning of Chapter 3 in the EA. Each of the resource sections that follow in Chapter 3 addresses the environmental effects of these actions.

51. The Valley Face Fuels Reduction Project does not allow enough time for public involvement and appears to be hastily done.

FS Response: We believe we have allowed adequate time for public involvement and the project has been thoroughly analyzed for environmental effects. Please refer to the Public Participation section of Chapter 1 for a discussion of public involvement.

52. Will the public that is eligible have just one month after the EA or EIS for the "objection process"?

FS Response: Yes, one month is the time allowed for the objection process in accordance with the Healthy Forests Restoration Act.

53. I object to a decision and the ending of the comment period before an EIS is completed and presented to the public.

FS Response: Your objection is noted. An EA was determined to be the appropriate level of analysis for this project.

54. Work on methods of utilizing the small wood for something other than burning it up on site.

FS Response: When the contracts for the Valley Face treatments are implemented, we intend to allow, or in some cases require, the contractors to utilize everything possible, even if the products are not typically considered "commercial" or "merchantable." The stewardship contracting process will be considered for implementing this project and has many advantages for facilitating the utilization of small wood products.

55. The EA/EIS must explicitly state the funding mechanisms that would be used to carry out all the post-logging slash ("fuel") treatment. How certain would each funding source be, i.e., how likely is it that slash could remain untreated? Also, the EA/EIS must state the expected time frame for treating all slash (nor for other "fuel" treatments, such as prescribed burning outside logged areas).

FS Response: Although the EA does not "explicitly state the funding mechanisms," post-harvest slash treatment in timber sales is assured as a purchaser requirement, or sometimes as a deposit into the brush disposal (BD) fund from the timber sale receipts. For stewardship contracts, the slash treatment (and fuels reduction in the "non-commercial" units) would be included in the contract as environmental credits. Some of the fuels reduction in the "non-commercial" units may be accomplished with appropriated funds. The Forest Service would not award a contract without provisions and funding for finishing the job, including treating the slash. The EA (Chapter 2, Features Common to Action Alternatives) states, "...fuel reduction activities would be carried out beginning in 2007 and continuing approximately 5 years." No prescribed burning is proposed other than for slash treatment in a few regeneration harvest units.

56. There is no component in this project that addresses the best way to treat private property so buildings are safer from fire.

FS Response: Treatment of private property is outside the scope and authority of the USDA Forest Service. The State of Montana and private consultants provide this type of service.

57. Cumulative effects from past projects need to be fully analyzed.

FS Response: Past, present, and reasonably foreseeable future actions are presented and fully described at the beginning of Chapter 3 in the EA. Each of the resource sections that follow in Chapter 3 addresses the cumulative environmental effects of these actions. Each resource specialist has also prepared a report that addresses if and how each of the past, present, and reasonably foreseeable activities are related to their resource area. These reports are located in the individual resource areas of the project file.

58. What type of surveys will be done to determine present forest condition? What past monitoring supports this project?

FS Response: Stand exams, post harvest evaluations, and reforestation stocking surveys were done in most of the National Forest stands to determine the existing conditions and to prepare reasonable treatment prescriptions. See the EA, Chapter 3, Vegetation, Information Sources and Exhibits P-1 through P-6 and P-16 for a more detailed description of available data and how they were used.

59. We request the FS adopt the Forest Restoration Assessment Principles found within the Forest Restoration Principles and Criteria (DellaSala, et al., 2003) as a screen for all proposed actions beyond the Community Protection Zone.

FS Response: One purpose of this project is to lower the risk of future high intensity fire and to improve the ability of firefighters to safely attack fires, not to restore the ecosystem in the manner that this paper suggests. Many of the treatments we are proposing in the action alternatives are within 400 to 500 meters of homes and private property as suggested in the document cited. Please also see the response to comment #30.

60. The FS has admitted that the use of database habitat information, as the Flathead NF relies upon for project analyses, is suspect: "Habitat modeling based on the timber stand database has its limitations: the data are, on average, 15 years old; canopy closure estimates are inaccurate; and data do not exist for the abundance or distribution of snags or down woody material..." (U.S. Forest Service, 2000c). How similar in quality to the IPNF's is the Flathead NF's database information? What wildlife analysis or modeling to be used relies on such databases? On average, how old is the Flathead NF's database information? Please indicate the Flathead NF databases' levels of reliability, citing verification studies.

FS Response: The Valley Face analysis for vegetation, wildlife, and fuels used the Timber Stand Management Record System (TSMRS) databases, including FSVeg, as one of the data sources for existing condition and predictive modeling. Other sources included aerial photo interpretation, old growth field surveys, field reconnaissance, R1 Vegetation Mapping Project (Exhibit P-5), and field surveys to calibrate various wildlife models. Modeling done for wildlife habitat that incorporated some database information includes bald eagle nesting habitat, Canada lynx habitats, flammulated owl and goshawk habitat, forested riparian habitat for fisher, and thermal and hiding cover for large mammals. None of the modeling done for this project relied solely on database information. The data in (TSMRS) are updated regularly when activities or field exams occur. Some of the stands in the Valley Face area were examined in 2005 so current data were available for many of the proposed treatment areas and old growth stands. Summaries of the available stand exam data, including standard error estimates, are in Exhibit P-3. The quality of database information on other Region One national forests was not assessed for this project.

61. This project is large in scale. I request that an EIS is chosen instead of an EA to more fully analyze the effects of the action.

FS Response: An EA was determined to be the most appropriate level of analysis for this project. The proposed action was evaluated against the ten steps of significance as outlined in

40 CFR 1508.27 for both context and intensity. None of the ten steps was determined by the District Ranger to be significant in the Valley Face Analysis Area and therefore an EIS was not necessary. ID Team members analyzed individual and cumulative resource effects to the extent necessary. A Finding of No Significant Impact (FONSI) will be prepared and presented with the Decision Notice.

62. For every project proposal, it is important that the results of past monitoring be incorporated into planning. All Interdisciplinary Team Members should be familiar with the results of all past monitoring pertinent to the project area, and any deficiencies of monitoring that have been previously committed to. For that reason, we expect that the following be included in the NEPA documents or project files:

- A list of all past projects (completed or ongoing) implemented in the proposed project area watersheds.
- The results of all monitoring done in the project area as committed to in the NEPA documents of those past projects.
- The results of all monitoring done in the proposed project area as a part of the Forest Plan monitoring and evaluation effort.
- A description of any monitoring, specified in those past project NEPA documents or the Forest Plan for proposed project area, which has yet to be gathered and/or reported. Please disclose the names of all other past logging projects (implemented during the life of the Forest Plan) whose analysis area(s) encompass the areas to be logged under this proposal. Please disclose if the FS has performed all of the monitoring and mitigation required or recommended in any NEPA documents, and the results of the monitoring.

FS Response: Past, present, and reasonably foreseeable projects are listed and described in Table 3-1. Past logging projects whose decisions were signed during the life of the forest plan in the Valley Face area are the Logan Meadows EA (1991) and the Fly Round EA (1994). Monitoring and mitigation prescribed for these two projects are found in the Environmental Assessments in the permanent files located at the Tally Lake district office. Monitoring specified in these EAs for both of these projects were primarily related to timber sale administration, reforestation, soil conditions, and water quality. All of this monitoring has been accomplished and these timber sale inspection reports, water quality monitoring reports, and reforestation monitoring reports are located and available at the Tally Lake Ranger Station. Soil monitoring reports and reports resulting from Best Management Practices monitoring are located in the Supervisor's Office. NEPA documentation completed prior to forest plan implementation did not contain monitoring plans. Forest Plan monitoring reports may contain information collected from within the project area but are not reported in a manner that information only pertaining to the analysis area can be determined. Monitoring specified in the Forest Plan that has yet to be gathered and/or reported is described in the Forest Plan.

63. The EA or EIS must disclose the ecological or economic cumulative impacts of fire suppression. A true no-action alternative would involve no fire suppression activities, since there's never been adequate NEPA on the Flathead NF's fire suppression policy.

FS Response: Large-scale wildland fire suppression has not taken place in the Valley Face analysis area (please refer to Table 3-1 in the EA) as all fires have been small. The amount and size of these past wildland fires do not constitute measurable cumulative impacts. Our no-action alternative represents the existing condition, which would include the suppression of wildland fires. Not implementing wildland fire suppression would be a new action, and therefore not appropriate for the no action alternative. Analysis of the effects of fire suppression and non-suppression under the NEPA was conducted programmatically at the Forest-level during preparation of the Flathead Forest Plan. Forest-wide standards are presented in Chapter 2 of the plan and direction is outlined in Appendix G. In addition, an annual Interagency Fire Management Plan is prepared, as per Forest Plan direction, to provide geographically specific direction for fire use to meet land management objectives through the use of natural fire starts and planned ignitions.

64. Since fire exclusion is identified as a culprit, the Flathead NF needs to take a hard look at its fire policies. The development of approved fire management plans in compliance with the Federal Wildland Fire Policy was the number one policy objective intended for immediate implementation in the Implementation Action Plan Report for the Federal Wildland Fire Management Policy and Program Review. In general, the FS lags far behind other federal land management agencies that have already invested considerable amounts of time,

money, and resources to implement the Fire Policy. Continued mismanagement of national forest lands and FS refusal to fully implement the Fire Policy puts wildland firefighters at risk if and when they are dispatched to wildfires. This is a programmatic issue, one that the current Forest Plan does not adequately consider. Please see Ament (1997) as comments on this proposal, in terms of fire policy and Forest Planning.

FS Response: The current Forest Plan does allow for wildland fire use outside the wilderness in specific management areas where fire management plans are in place. The Flathead National Forest plan is being updated and should be finalized in the fall of 2006. The new Forest plan takes into consideration fire exclusion and the importance of integrating wildland fire use back into the environment where feasible. Some things that need to be considered from the Forest Service perspective is the risk involved with utilizing prescribed fire and wildland fire use fires in areas of continuing high development. The Forest Service is focusing their efforts on areas in the wildland urban interface; people in these adjacent communities are not universally receptive to having managed fire in their back yards.

Recreation

65. I am concerned that existing trails for hiking, biking, and cross-country skiing, along with game trails, might be lost or damaged beyond repair. I hope there is a process of evaluating these trails and working to preserve them for wildlife and people.

FS Response: Currently, the officially designated hiking, biking and other trails used by recreationists in the Valley Face area have been identified during the analysis process. These trails have been assigned a trail number and entered into the District's data base; they would be protected or restored as needed if affected by project activities.

66. Illegal ATV use will increase with forest treatments in this plan due to easier road access and brush removal.

FS Response: The National OHV rule has been signed. Off road vehicle users found on trails or roads that have not been designated for this use can be cited. FS Law Enforcement agents are monitoring this type of use and the FS is currently working on educating the public on these changes to off road vehicle use.

67. This proposal should not encourage or increase off trail motorized uses.

FS Response: The District agrees with this statement and is actively educating the public on what is legal for OHV use. More work in this area will continue as the Forest develops its travel plan maps for each District. Tally Lake is slated for 2009 completion.

68. Increases in population and use of these public lands by local residents and the public at large introduce potential fire safety issues. What policies are in place and are they in need of revision?

FS Response: The Tally Lake Ranger District is proposing to treat areas of heavy fuel loading and decadent forest within the urban interface. Additionally, each district has a prevention plan that outlines steps to be taken as preparedness levels move towards extreme fire indices. Specific to the Flathead National Forest, in times of extreme fire danger the forest has been closed down to prevent any unwanted human caused fire starts. A decision of this magnitude is made by the Forest Supervisor.

Roads

69. We ask that the FS utilize the Roads Analysis Process and analyze travel management, including road obliteration, and include an alternative that would not leave any deferred or outstanding maintenance needs/BMP upgrades in the analysis area.

FS Response: The Roads Analysis process has been utilized for this project. This analysis can be found at Exhibit M-1 in the project file. Obliteration of roads found not necessary for future National Forest management was determined to be outside the scope of this hazardous fuels reduction project. Over 40 miles of BMP upgrades would be a part of each of the action alternatives if selected.

70. Roads should be reconstructed in as minimal a manner as possible, and abandoned after the project is completed.

FS Response: Temporary roads are planned to be constructed to minimal standards and obliterated after their use. Some existing, unauthorized roads will be reconstructed for use on this project and then similarly obliterated.

71. The USFS lacks funds for road maintenance. Why is it important to continue building roads?

FS Response: No new road construction requiring future road maintenance is proposed for this project.

72. Roads compact soils, create landslides, harm wildlife and water quality. No new roads of any kind should be built.

FS Response: The only road construction proposed in the action alternatives is for temporary roads which are used for their intended purpose and subsequently removed. The environmental effects associated with these roads are minimized to acceptable levels through the use of modern design criteria and the application of best management practices.

73. How much logging traffic will occur on Mountain Meadows Road during the summer and fall months of the year?

FS Response: The amount of log truck traffic is difficult to predict for particular times of the year. The summer and fall months constitute the majority of the time roads are suitable for log haul and soils in the forest area suitable for heavy equipment travel. Some logging could take place during the winter but winter logging is not required on any of the proposed treatment areas. Timber sale contractors may elect to perform winter logging if soils are completely frozen. An estimated 600 to 1000 log trucks would be required to use at least a portion of the Mountain Meadows Road in both action alternatives. How much of this is in the summer and fall months would be determined by the timber sale purchaser. Only a very small number of log trucks, if any, would need to use Forest Service Road 542 where it crosses private property in the Mountain Meadows area.

74. The plan calls for reconstructing 40 miles of road to reach units. How much taxpayer money will be spent to log these parcels?

FS Response: Units identified as requiring the reconstruction of existing roads for access are commercial timber harvest areas whose sale of wood projects would contractually require road reconstruction for BMP compliance. No additional taxpayer money would be needed.

75. Rebuild /Improve Twin Lakes Road # 2922.

FS Response: This road is identified as a haul route for Units 27 and 29 in both action alternatives thus requiring reconstruction and BMP improvements.

76. How much will be commercial and how many log trucks do we expect to haul out road 2948?

FS Response: Both action alternatives propose to treat vegetation in units 18, 19, 19A, and 20. An estimated 300 to 400 log trucks would be needed to remove wood products on road 2948.

77. Will we use the bermed spur road 2948B?

FS Response: Yes, this road will be used if an action alternative is selected.

78. I have concerns for safety on Boot Jack Lake Road and Cliff Creek Road due to logging traffic, particularly in the winter.

FS Response: Your safety concerns have been noted. Timber sale contracts require the posting of signs indicating truck traffic and we have recently removed some branches and small trees to increase sight lines around curves. Additional Forest Service signing may be necessary to increase safety.

79. Has a review been done of road accessibility for fire and emergency services for residents? How will rural fire departments in this area be consulted and input considered?

FS Response: Public involvement and collaboration, including the scoping process of this project, made the information about this particular project available to the general public. This included fire departments and people implementing the community wildfire protection plan. The Forest Service has detailed maps showing road accessibility for wildland fire suppression. The Forest Service has not performed a review of accessibility for fire and emergency services as structure protection and other emergency services for residents are not our jurisdiction. Local fire departments, municipalities, and Flathead County perform these services.

80. Post a speed limit on Rd. 351, at the entrance to Bootjack Lake.

FS Response: A yellow speed recommendation sign has been posted on this road.

81. As residents of Mountain Meadow Road which is unpaved we are concerned about the safety hazards created by dust from traffic.

FS Response: Dust abatement is a requirement stipulated in our timber sale contracts.

Social

82. I feel the FS needs to better educate the public that fire and insects are natural; there are simple treatments to protect homes.

FS Response: The environmental assessment for the Valley Face project and previous environmental analyses conducted on the Flathead National Forest for at least the past 15 years have discussed the role wildland fire and insects play in naturally functioning ecosystems. Those individuals interested in the management of the National Forests have had access to these documents and have had an opportunity to participate in the planning of projects. The State of Montana and private consultants provide information regarding "Fire Wise" treatments for private property owners.

83. The issue of fire protection comes up more and more frequently at the county planning board meetings. Provision of recharge tankers in rural areas is a condition being placed on some subdivisions. Has the Forest Service looked at the viability of this as a resource to reduce risks in the urban, public, and private, forest interface?

FS Response: If the Forest Service personnel were assisting the county in fire suppression on private lands and a recharge station was available for use, the Forest Service would use the resource to assist with the suppression efforts. Placing recharge stations on Forest Service land has not been necessary. Tally Lake Ranger District personnel are fortunate enough to have a wealth of existing drafting sites available on Forest Service land, making development of drafting sites unnecessary.

84. The proposed cuts (7, 303, 21,21A) will lower the value of our 40 acres in Mountain Meadows.

FS Response: We agree timber harvest and fuel reduction activities could have a negative effect on the visual appearance of an area during the treatments and immediately after they are completed. However, vegetation is usually recovered in a forested setting within 2 to 3 years to the extent that disturbed soil is covered. The treatments proposed in the action alternatives are designed to meet Forest Plan objectives for visuals management. In addition, property adjacent to forested areas that have been treated for a reduction in wildland fire potential often increase in value.

85. What identification has been done of fuel storage in the project area and particular fire risks this creates?

FS Response: There are no fuel storage facilities on National Forest System land in the project area. Identification of fuel storage facilities on private property is outside the scope of the management of the national forests; however some rural fire districts may have this information.

86. The Tally Lake Road is experiencing increased use of the Tally Lake Road for the storage of garbage containers for eventual pick by residents in the area. This not only invites wildlife issues and problems but invites potential vandalism and fire sources in an inappropriate area.

FS Response: Storage of garbage containers on private property is outside the scope of this project. However, we appreciate you bringing this to our attention, and are working with private landowners and Montana Fish, Wildlife, and Parks to address the situation.

87. The forest service almost never comments that we are aware of on subdivisions; this should be evaluated as a potential tool to reduce potential problems created by subdivisions. Additionally, Flathead County is in a year long process of revising the county growth policy. The FS could use this as an opportunity to actively participate in policy considerations that will influence development in the forest interface.

FS Response: Your suggestions are outside the scope of the management of the national forests.

88. I would like to see aesthetics maintained and recreational values preserved.

FS Response: Please see the sections on Visuals and Recreation in Chapter 3 of the EA. Activities proposed in the action alternatives were designed to maintain these values under the management guidelines of the Forest Plan.

89. I urge you to consider the implications of managing for improved grizzly bear habitat. Given the residential characteristics of this project area, encouraging additional grizzly bear use is not wise for either humans or the bear.

FS Response: The Valley Face Fuels Reduction Project does not encourage additional grizzly bear use of this area. The effects of the alternatives on grizzly bears are discussed in the EA section on Sensitive, Threatened, and Endangered Wildlife Species. See also Exhibits Rt-11, Rt-13, and Rt-17.

90. The rumbling of trucks and sawing of trees would ruin my time on the land.

FS Response: We agree that timber harvest and fuels reduction activities typically create unnatural noise that is unpleasant for most recreationists. However, these are also short-term activities in a particular area. Timber harvesting and fuels reduction typically require no more than a few weeks to complete for an area within "ear-shot." Log truck traffic may be more long-term as some haul roads may require use for several months.

Soils

91. Please disclose what inventory or monitoring information of soil functioning indicators the Forest has, including lichens, fungi, insects, etc. since these can and do define existing and probable future forest conditions, especially related to natural recovery following fire.

FS Response: The Forest does not use lichens, fungi, or soil microbes as an indicator of soil productivity. However, we do monitor the physical condition of the soils, characteristics that are more easily observed and measured than lichen and fungi. Either boot tip transects or simple walk-through observations were done to determine the extent of past harvest activities and their effect on the existing soil condition. The method we use depends on the extent of past activities in the proposed units. Some proposed units obviously have no past activities. In this case we simply walk through the unit to verify this, and document the results in a field note. Where roads or skid trails of measurable extent were present and still showed evidence of detrimental soil disturbance, we ran random transects to determine the extent of detrimental soil disturbance. In addition, we have measured soil bulk density and done statistical analysis of the results so bulk density can be related to the type of equipment, the season of use, and the effect on plant root growth.

92. Where livestock are permitted to graze, we ask that you assess the present condition and continue to monitor the impacts of grazing activities upon vegetation diversity, soil compaction, stream bank stability, and subsequent sedimentation.

FS Response: The one allotment that overlapped with the proposed Valley Face analysis area has not been utilized in the past two years. Reissuing the permit is not likely. Soil conditions within the former allotment are improving.

93. Among other things, we are concerned that project activities will accelerate soil erosion, increase soil compaction, and degrade soil productivity. Prescribed fires and mechanical treatments have the potential to adversely affect soil productivity.

FS Response: The design features outlined for the Valley Face area and displayed in Chapter 2 are based on the need to reduce detrimental soil disturbance, which includes effects from compaction, rutting, puddling, and soil erosion. Soil erosion control measures would be implemented wherever bare soils are exposed. Based on the monitoring reports that are found in the project record, on literature cited within those reports, and on the field visits that determined the existing soil condition, we estimate that with the proper implementation of the design features, all proposed activity areas will meet the Region 1 Soil Quality Guidelines by having less than 15 percent detrimental soil disturbance. As is stated in the specialists report, most of the detrimental soil disturbances do not cause permanent losses of productivity. Prescribed fires would be timed to occur when they will burn with low or moderate heat, which reduces the risk of soil detrimental effects and keeps the effects within or less than the historic range for fire disturbances. Skid trails would be laid out to cover less than 15 percent of the area and will reuse any existing roads or trails. Any mechanical site prep or slash reduction would utilize an excavator, which bulk density analysis on the Flathead National Forest has shown has light impacts on the ground and seldom increases bulk density enough to be detrimental.

94. Are the threshold levels for soil compaction adequate for maintaining soil productivity...Is allowing 15% of an area to be impaired appropriate to meet planning goals...The Ecology Center recently asked the Northern Region if they have ever performed this validation monitoring of its 15% Standard...The Northern Region office's reply letter stated that there is no documentation that responds to this request. If the Flathead NF is aware of any new or other documentation that would respond to this request, we ask that you please disclose it to us now.

FS Response: The soil analysis followed Regional guidelines for soil analysis as specified in FSM 2500-99-1. The subject of the 15% regional guideline for detrimental soil disturbance is

discussed frequently. This issue is discussed in the soil scientist's report in the project record. We use the regional standard because there is no better documentation for any other standard for acceptable amounts of soil disturbance. Until such time that research better defines acceptable limits of soil detrimental disturbance, the current Region 1 standard is a reasonable amount. Page-Dumroese and others (2000) describe 15 percent as the lowest magnitude of change detectable given current monitoring technology. In other words, it may be impossible to monitor the effectiveness of a standard that requires less detrimental soil disturbance.

In addition, we have monitoring that relates observable physical soil conditions to actual bulk density readings. The report that made this analysis is in the project record. Using this report, we are able to relate visually observable soil features to bulk density measurements and growth limiting bulk densities from literature. We use this monitoring to determine how much detrimental soil disturbance exists in a proposed activity area. We can measure the aerial extent of detrimental soil disturbance across an activity area. It is reasonable to assume that by maintaining at least 85 percent of an activity area with no disturbance or non-detrimental disturbance conditions we are maintaining soil quality. We can also relate the degree of soil disturbance (Howes' disturbance classes) to the actual bulk density and the effect that bulk density has on plant root growth.

Page-Dumroese and others (2000) wrote that relatively small disturbances of 15% of an area result in relatively small losses of nutrients and at those levels current guidelines (less than 15%) seem to be adequate. One must consider that there is not a complete loss of productivity in the 15 percent of the area disturbed, and that some parts of that area are probably only lightly disturbed and will recover relatively quickly.

Vegetation

95. I agree that overcrowded underbrush needs to be removed; however, it should not require the harvesting of merchantable timber to do so. We need to preserve our forest overstory to retard brush growth and conserve soil moisture.

FS Response: Reducing surface and ladder fuels (downed wood and small trees) is an important component of the proposed fuel reduction. Another component of fuels is canopy density. Increasing the space between tree crowns can significantly increase the probability that a fire would burn as a lower severity ground fire allowing for safe and effective fire suppression. (See the Fire and Fuels section of Chapter 3 in the EA and Exhibit O-14) Another part of the fuels reduction objective for Valley Face is to shift the species composition to a higher proportion of fire-resistant trees. These species are also shade intolerant and cannot regenerate or thrive in a closed-canopy stand. Specific treatments were designed based on existing stand conditions and locations. See Chapter 3, Vegetation and Exhibits P-4 and P-15 for detailed descriptions of the existing landscape and stand conditions and effects of the treatments.

96. We do wish to express concern with the proposed retention levels, as opening the canopy too much would likely cause other problems. Retention should be 40% or more after treatment.

FS Response: See response to comments 27, 31, 33, and 95 above. Also, Alternative C retains more trees in all units with stand conditions that would allow higher retention and still meet the purpose and need. Alternative C also dropped several units that were proposed in Alternative B.

97. This project continues the trend toward over abundance of Douglas-fir. It places timber harvest above all other forest values.

FS Response: Alternative B would increase the forest cover type of larch/Douglas-fir by over 900 acres and Alternative C would increase it by over 300 acres. Within both the larch/Douglas-

fir and shade intolerant mix cover types, the treatments would favor retaining and/or regenerating larch and ponderosa pine while reducing the proportion of Douglas-fir. However, most parts of the Valley Face area are very good growing sites for Douglas-fir and it will remain a dominant species in the area. See Chapter 3, Vegetation and Exhibits P-8 and P-10 for more detail on stand groups and cover types.

Non-commercial treatments, with no expected timber harvest, are proposed in more than a quarter of the area in Alternative B and more than one-third of the area in Alternative C.

98. The continued fragmentation of the Flathead NF is a major ongoing concern. It is documented that edge effects occur 10-30 meters into a forest tract (Wilcove et al., 1986). The size of blocks of interior mature and old-growth forest that existed historically before management (including fire suppression) was initiated must be compared to the present condition. Again, this should be a landscape ecology analysis that looks at the larger picture of the fragmentation of habitat in surrounding concentric circles.

FS Response: The effects in terms of fragmentation were analyzed in depth for this proposal. Existing conditions and effects of fragmentation of forested areas and of severing and/or narrowing forested corridors were described in four sections in the EA: 1) Vegetation, 2) Old Growth and Old Growth Associated Wildlife Species, 3) Sensitive, Threatened, and Endangered Wildlife (particularly for the fisher), and 4) Riparian and Wetland Wildlife Habitat. See also Exhibits P-13, Q-8, Q-10, and Rg-7, which look at patch sizes, edge effects, and habitat connectivity.

99. Opening the forest canopy will dry the forest out, stunt growth, create blow down, and increase the severity of fire.

FS Response: Experience and research have shown that opening the forest canopy reduces competition, making more light, water, and nutrients available to the remaining or regenerated trees. This allows for improved growth rates, especially if the most dominant and vigorous trees are left, which is what is proposed in the Valley Face treatments. Opening the forest canopy can increase the incidence of "blow down" or wind throw. The Valley Face treatments would attempt to leave the most wind firm trees and would be laid out considering topography, soils, and wet areas in order to minimize wind throw. Opening the forest canopy can also increase the rate of fire spread, but generally not the fire severity (see the response to comments #30 and #35).

100. Define the objectives behind the various retention levels; include the # of trees left per acre and per cutting unit.

FS Response: For detailed descriptions of the proposed treatments including tree retention, see Chapter 2, Tables 2-1 to 2-11 and Chapter 3, Vegetation.

101. A conclusion is given that Douglas-fir are more abundant now than historically; will this project continue this condition?

FS Response: After implementing the proposed treatments, Douglas-fir would remain the most dominant tree species the Valley Face area. However, within the treatment units, the proportions of larch and ponderosa pine would be increased and would be the dominate species in at least half of the regeneration harvest (seed tree, shelterwood) and precommercial thin units. See Chapter 2 for a list of the units and proposed treatments; also Chapter 3, Vegetation and Exhibit P-15 for descriptions of the stand compositions expected after treatment.

102. Why doesn't the USFS design a plan that saves all tree species over 12" dbh and focus on removing small fuels?

FS Response: The Valley Face project does focus on removing smaller trees and downed wood

and retaining the largest and healthiest trees. However, a 12 inch diameter limit may not allow enough fuels reduction or flexibility to change species composition in some units. Maximum diameters for tree removal have been established to retain the largest live and dead trees and protect important wildlife structures (Chapter 2, Features Common to Action Alternatives).

103. The Valley Face Fuels Reduction Project seems to be concerned with timber volume, instead of health.

FS Response: The units were proposed to meet the dual purpose and need for fuel reduction and reducing the vulnerability of the forest to large scale disturbances, including insects and disease (forest health). Timber volume was considered in the design of some of the units, but was not the reason any unit was proposed and was not estimated until needed for the economics effects analysis. See the responses to comments #31, #95, #97, #100, and #102.

104. The Northern Region Overview identifies fire suppression as a problem for development of western larch type old growth, yet the Proposal letter outlines more of the same kind of management that would prevent natural development of western larch type old growth. Where do you get the idea that “management” actions can replace natural processes, and result in healthy, intact ecosystems?

FS Response: The Valley Face “management actions” are not intended to “replace natural processes.” They are intended to reduce fuels in the urban/forest interface in a manner that would allow natural processes to continue, as much as possible. The Valley Face area has been altered by fire suppression, past timber management, and private land development. Fire suppression will continue in this developing urban interface where residents would generally not be receptive to allowing the types of wildfire that historically occurred. Larch requires sunlight and disturbance to regenerate and grow. It will not develop into mature stands when overtopped or in dense stands. Although they do not provide all the natural processes of fire, thinning and regeneration harvest can promote larch development.

105. “Thinning” a forest would “artificialize” the forest ecosystem. Lodgepole pine is particularly subject to blowdown, once thinned. And any forest condition that is maintained through mechanical manipulation is not maintaining ecosystem function. The proposed management activities would not be integrated well with the processes that naturally shaped the ecosystem and resulted in a range of natural structural conditions. Thus, the need for standards guiding both the delineation of zones where “artificializing” fuel reduction actions may take place and that also set snag and down woody debris retention amounts.

FS Response: See the response to comment #31 for a discussion about how the unit locations were determined. See comment #104 about the trade-offs between management in the urban interface using natural processes (fire) and mechanical methods. Snag and downed wood requirements are established in Amendment 21 of the Flathead Forest Plan. These standards are included in the Valley Face project and are described in Chapter 2, Features Common to Action Alternatives.

106. Units 7/303 across from Mountain Meadows are the largest units in the project--I believe they will remove the last remaining virgin forest in the area not on private land.

FS Response: The stand that is proposed as Unit 303 regenerated from a past timber harvest and Unit 7 had been treated with a timber harvest activity in 1973; therefore both of these are not virgin forests. However, because of your concerns and other resource issues, Unit 303 was dropped from both alternatives. Unit 7 remains in Alternative B. In Alternative C, it is called Unit 417 and is changed to an understory fuels reduction 21 acres.

107. We understand that beetle infestations and resulting tree mortality is an issue in some areas. What analysis has been done of this issue?

FS Response: Chapter 3, Vegetation has a brief description of the analysis for bark beetles. Complete documentation of the analysis is in Exhibit P-1.

108. I would propose that a heavy dispersed retention be considered, and that there be a 300'-900' uncut buffer along the boundary of our property.

FS Response: This comment refers to the Mountain Meadow area. Understory fuels treatments (Units 417 and 421) are proposed adjacent to private property in Alternative C. With Alternative C, a heavier retention is proposed in all units where stand conditions would make it feasible and still meet the fuels reduction and stand health objectives.

109. We would like to see all deciduous trees retained.

FS Response: We agree. One of the "Features Common to the Action Alternatives" includes leaving all deciduous trees, unless they would compromise fuels or reforestation objectives. An example of where they may be removed might be in a part of a stand with a thicket of birch that is smaller than the diameter for understory slashing and would inhibit conifer regeneration.

110. We would not like retention levels so low as to create units resembling clearcuts.

FS Response: Your concern is noted. Alternative C increases the retention levels from those proposed in Alternative B in any units where stand conditions would allow. However, in a few units that are dominated by lodgepole pine, higher retention levels would probably lead to increased blowdown and higher fuel loading and the opportunity to regenerate the stands with more windfirm and fire-tolerant species would be lost.

111. Don't focus only on fuel reduction; the emphasis should be on creating a healthy forest, not just fuel reduction.

FS Response: The purpose and need includes creating stand conditions that would "reduce the vulnerability of the forest to large scale disturbances from insects, diseases, or unwanted wildland fire..." Many of the proposed treatments are designed to change or maintain stand conditions to contribute to a more diverse, vigorous, and resilient forest.

112. Pre-commercial thinning should be carried out on all stands within the project area that would benefit from a silvicultural and healthy forest standpoint and not only in the name of fuel reduction.

FS Response: Precommercial thinning was considered for all stands that could benefit with increased tree growth, species preference, and/or tree health. In order to meet the fuels reduction purpose and need of the Valley Face project, stands not immediately adjacent to private land were deferred to a subsequent decision that will focus on precommercial thinning. Note that several stands in the "East Mountain Meadows" area were included in a previous decision (2005) that focused on precommercial thinning and are scheduled to be thinned in 2006 or 2007. In addition, precommercial thinning is allowed in Canada lynx habitat only in stands that no longer provide habitat for snowshoe hares. About half of the national forest land in the Valley Face area (the higher elevation, cooler and moister areas) qualifies as lynx habitat.

113. It is my opinion that a heavy dispersed retention or 100% retention would better serve a healthy ecosystem.

FS Response: Most forest research scientists and resource specialists, including members of the interdisciplinary planning team at the Tally Lake Ranger District, find that forests with a variety of stand densities, tree and shrub species, and size classes are most resilient to major disturbance and provide a variety of habitats. Retention refers to the amount of vegetation left on a site after treatment and is measured as a percent of canopy cover (please see the Vegetation section of Chapter 3 of the EA, Direct and Indirect Effects of Alternatives B and C). Very few stands have more than 90 percent canopy cover naturally. Even in the stands proposed for understory fuel reduction where all of the overstory canopy would be retained, the canopy covers are generally 30 to 90 percent.

114. Commercial logging practices are well known to damage remaining trees to the extent that many of them will die as a result.

FS Response: Logging does sometimes damage a few reserve trees, especially smaller ones. However, the damage is usually minimal. A number of timber sale contract requirements are used to insure damage is minimized to remaining trees, soil, water, and other resources.

115. I am fearful the plan will result in greater fire or insect hazard.

FS Response: Based on the effects analysis, both of the action Alternatives are expected to decrease the hazard of fire and bark beetles by changing stand conditions to something less susceptible. Also, see the response to comment #35.

116. The units near Bootjack Lake (30, 31,31a) should be changed to Heavy Dispersed Retention, because removing 70-90% of the trees on these units seems tremendous over-kill. Fuels have already been reduced in these easily-accessed areas by firewood gathering.

FS Response: With the amount of lodgepole pine and Douglas-fir present, Units 30, 31, and 31A do not lend themselves to a heavy retention thinning and still provide for fuels reduction including surface, ladder and crown fuels. However, to address this concern, the eastern part of Unit 30, closest to the lake, was changed from a moderate retention thinning in Alternative B, to a high retention thinning in Alternative C.

117. Speak about the time periods for regeneration; emphasize the long timelines involved in the life of the forest and change over time.

FS Response: Chapter 3, Vegetation addresses these timeframes, particularly the sections called "Descriptions of Stands, Grouped by Cover Type", "Past Timber Management – Reforestation", "Direct and Indirect Effects of Alternative B and C – Reforestation after Seed Tree and Shelterwood Harvest" and "Summary of Effects of Implementation of Alternatives B and C".

118. Please don't over thin or slash all the understory and create even-aged stands--fuel reduction can occur with a multi-level canopy.

FS Response: All of the treatments are intended to reduce surface and ladder fuels, and in many cases, crown fuels. However, in all treatments, some of the understory would be left to provide tree structure and species diversity. The regeneration harvests are designed to create even-aged (2-story) stands. Many of the commercial thins and understory fuels treatments are in multi-layered stands and the thinning is expected to maintain that diversity in the overstory canopy layers.

119. Please consider the large body of research that indicates logging, roads, and other human caused disturbance promote the spread of tree diseases and insect infestation.

FS Response: Most of the research and literature we found indicates that appropriate vegetation management that reduces competition, increases vigor, and promotes resistant species can reduce the susceptibility of stands to insects and diseases.

120. I want to learn more about beetle kill and the root disease you refer to--how much a threat are they in our area, and what management practices should/should not be proposed?

FS Response: See Chapter 3, Vegetation and Exhibit P-1 for information about bark beetles in the Valley Face area. For general descriptions of bark beetles and appropriate management practices, a variety of resources are available. The Montana State Department of Natural

Resources has service foresters that provide site-specific advice to landowners, the Montana State University Extension Forester offers short-courses on insect and disease identification and management, and the US Forest Service, State and Private Forestry, publishes many reports, research papers, and field guides on forest insects and diseases.

Visuals

121. There will be little public support for the view shed that will be left after this proposed action is completed.

FS Response: Your opinion is noted. Please see the Visuals section of Chapter 3 of the EA for an analysis of the visual resource.

122. Tall trees are necessary on all sides of our meadow (Mountain Meadow).

FS Response: Treatments in the vicinity of Mountain Meadow all propose the retention of the largest trees in the stands. Treatment in this area include understory fuels reduction (which retain all the tall, overstory trees), commercial thinning (which retain most of the overstory trees), and shelterwood harvests (which retain many of the overstory trees).

123. Don't cut right to the private property--leave a buffer.

FS Response: One of the purpose and needs of this project is to reduce fuels in the wildland-urban interface to help reduce the likelihood of fire spreading onto private property and increase public and firefighter safety. The strategic areas identified for fuel reduction adjacent to private property are consistent with the Flathead County Community Wildfire Fuels Reduction / Mitigation Plan that all wildland firefighting agencies in Flathead County are using.

124. We understand the MDR stands to represent a retention of 20-30 trees per acre. We feel this will have significant detrimental visual impacts on our project. We would like to see the development of a new or modified alternative for analysis that matches the type of forest management on our property, both in terms of tree retention per acre, tree spacing, and the retention of a multi-storied stand.

FS Response: Alternative C was developed to respond to this concern. Units 35B, 421, and 423 were all created to have increased tree retention compared to the proposed action.

125. The units adjacent to Mountain Meadows are very long and right along the road--they will be ugly.

FS Response: We agree timber harvest and fuel reduction activities could have a negative affect on the visual appearance of an area during the treatments and immediately after they are completed (please see the response to comment 122 above). Alternative C proposes a less intensive treatment along the east edge of the private Mountain Meadow property in part to respond to this concern. Please see the Visuals section of Chapter 3 in the EA for a complete discussion of the visual resource.

Water

126. What can be done to address the potential negative impacts of sedimentation in the Lost Creek drainage? Can increased sedimentation impact the underground connectivity of this stream system?

FS Response: The project is designed to protect all streams from project-related sediment. Design features that limit soil disturbance would reduce the risk of soil movement occurring; the presence of stream and wetland buffers greatly reduces the potential of sediment traveling overland to a water body. All of the roads used to haul merchantable material will be brought up to "Best Management Practices" standards; this means that many existing places where

sediment can run into streams from roads during rain events or snow runoff will be repaired (see Water Resources section in Chapter 3 of the EA for a more detailed discussion). There is no evidence that sediment has impacted the underground connectivity in any of the stream systems in the Valley Face area. There is no known research that suggests that sediment would affect connectivity of surface and ground water on these fractured landforms.

127. We request a careful analysis of the impacts to fisheries and water quality, including considerations of sedimentation, increases in peak flow, channel stability, risk of rain-on-snow events, and increases in stream water temperature. Please disclose the locations of seeps, springs, bogs and other sensitive wet areas, and the effects on these areas of the project activities.

FS Response: The effects of the project on fisheries and water quality were carefully analyzed; please refer to these sections in Chapter 3 of the EA and the project record. Stream buffers are designed to prevent changes in stream temperature; water yield increases would be within acceptable limits that should not impact channel stability or peak flow magnitude; see comment #126 above for a discussion of sediment. Rain-on-snow events typically do not occur in the Valley Face area due to the relatively low elevation; and the dispersal of the treatment units, maintenance of stream side buffers, and retention of the largest trees within units would reduce the effect of the project on snow deposition patterns and runoff. Please refer to the scientific paper by MacDonald and Hoffman (1995) for a thorough discussion of the causes of peak flows in Northwestern Montana. This document is available at the Tally Lake Ranger District office.

128. It is extremely important the FS disclose the environmental baseline for watersheds. Generally, this means their condition before development or resource exploitation was initiated. For example, the baseline condition of a stream means the habitat conditions for fish and other aquatic species prior to the impacts of road building, logging, livestock grazing, etc. Therefore, proper disclosure of baseline conditions would mean estimates of stream stability, pool frequency conditions, water temperature range—essentially the values of Riparian Management Objectives along with such parameters as sediment levels. When such information is provided, comparison with the current conditions (after impacts of development) will aid in the assessment of cumulative effects of all alternatives.

FS Response: The historic condition of the watersheds within the project area is discussed in the Water Resources and Aquatic Species sections in Chapter 3 of the EA. Given the low elevation and proximity to population centers of the Valley Face area, development understandably began prior to the institution of programs designed to characterize the ecological condition of the watersheds; however, all historical and current information on these watersheds was considered in the analysis for the project. Most water bodies in the project are believed to have been historically fishless, a conclusion supported by the current populations of non-native fish and the necessity of stocking to maintain the Bootjack Lake fishery. There is also no evidence that any stream in the project area has had perennial surface connectivity to the Stillwater River since the last glacial period ended some 10,000 years ago.

129. How will these cuts affect Lost Creek? Erosion? It will be important to review the hydrological relationship and potential impacts from forest cover and water retention in an area where water quantity and quality is of concern to residents. Potential issues include the Lost Creek Fan dispersal of pollutants in that area.

FS Response: As stated in the Water Resources section of the EA, Lost Creek was the one watershed that was analyzed for water yield, primarily because it is the only stream in the area that is considered fish bearing. Water yields were found to be within acceptable ranges, as were values attained for channel stability. The management practices in Lost Creek and the entire area will conform to all State and Federal regulations, including the Montana Best Management Practices which have been successful at protecting water resources. In regards to the “Lost Creek Fan dispersal of pollutants” there is a very thorough discussion of the relationship between the primary sources of nitrates to the ground water as monitored at wells and primary causes of pollutants, i.e. the increased use of fertilizers, domestic animals, and septic systems. The report states that Lost Creek has less than 0.1 mg per liter. The report is available in the

project file in Exhibit G-1.

130. The current MDR designation for the units near Bootjack Lake (30, 31,31a) would have great potential to unacceptably increase the run-off of silt and debris into Bootjack Lake, very likely causing a major negative ecological impact.

FS Response: The design criteria built into all harvest and fuel reduction projects are intended to prevent these types of actions from affecting the surface or ground water. These are discussed in Exhibit H-21 of the project file. These design criteria has been shown to be effective through past BMP audits. Please see the Water Resources and Aquatic Species sections of the EA and project record for a thorough discussion of the potential project effects to Bootjack Lake and other water bodies.

131. Where livestock are permitted to graze, we ask that you assess the present condition and continue to monitor the impacts of grazing activities upon vegetation diversity, soil compaction, stream bank stability, and subsequent sedimentation.

FS Response: As stated in Chapter 3 of the EA, the only area within the analysis area where cattle have been grazed on NFS lands in the past is in the "Chinook Lake Allotment." This allotment has been in the inactive category, i.e. unused, since 2003. The new Flathead Forest Plan, currently being finalized, does not authorize the continuation of this allotment. However, the impact of the past grazing management was considered as a contributor to the existing condition for the soils, vegetation, and water resources in the project area.

Weeds

132. Roads are a major vector for weeds. This project builds over five miles of roads.

FS Response: The Invasive Plant Species - Noxious Weeds analysis in Chapter 3 of the EA acknowledges that this project would increase invasive weed establishment and spread in the project and surrounding area. Please refer to this section.

Major roads and proposed haul routes were surveyed for noxious weeds from June through August 2005. These sites are considered the areas most susceptible to establishment and serve as vector corridors for spread into newly disturbed areas. Twenty-six road segments (estimated at 124 acres or 53 miles) were surveyed for invasive plants. A total of 14 invasive species were mapped during 2005 surveys.

Temporary road construction activities would expose bare soil and parent material, creating suitable substrates for weed germination. In addition, use of these temporary roads may also contribute to the dispersal and spread of weed seeds. Alternative B proposes 4.5 miles of temporary roads and Alternative C proposes construction of 3.5 miles. Design features that will lessen the impact of weed spread; specifically aggressive weed treatments, soil stabilization measures, revegetation of disturbed sites, and restoration of constructed temporary roads would lessen the establishment and spread of weeds (see Chapter 2).

133. Don't forget to treat for noxious weeds. Weeds tend to quickly establish in disturbed sites.

FS Response: Yes, weeds are more likely to establish in disturbed sites. Project design criteria include treatment of haul routes, landings, and other high risk areas for weed spread. Weeds within the project area would be treated according to priorities outlined in the Forest Noxious and Invasive Weed Control Environmental Assessment and Decision Notice (2001). Design criteria in "Features Common to all Action Alternatives" in Chapter 2 include treatment associated with this project. If treatments occur as part of the weed program, then, treatments will be monitored for efficacy after each treatment, and treatment and efficacy data will be

included in a national database (TERRA) to assist with treatment priorities and evaluating success of treatments.

134. I would like care to be taken not to spread noxious weeds, especially hawkweed.

FS Response: Efforts to control the spread of noxious weeds include prevention, containment, and eradication methods. Eradication is generally limited to localized areas and category 2 (hawkweeds are included in Category 2) and 3 species. Project design criteria include treatment of haul routes, landings, and other high risk areas for weed spread. Treatment of known sites or new sites created from project activities will be prioritized, at the Forest level, based on the Forest Noxious and Invasive Weed Control Environmental Assessment and Decision Notice (2001). Design criteria in “Features Common to all Action Alternatives” in Chapter 2 include treatment associated with this project. Prevention and containment methods will be used during project activities to reduce the potential and risk of weed spread/introduction within and around the project area. These measures include; washing equipment prior to entering the project area, using weed free straw, seeding with certified weed free seed mixes in areas where bare soils are exposed (such as landings and skid trails).

135. The two most prevalent weeds are hawkweed and knapweed. Disturbing the ground will surely cause these weeds to spread.

FS Response: 2005 surveys of the project haul roads indicated that spotted knapweed is the most prevalent weed in the project area. This is followed by oxeye daisy then by orange and yellow hawkweed.

Yes, ground disturbance would increase the spread of these species that occur along portions of many of the roads, gravel pits, and other disturbed sites. With the exception of orange and yellow hawkweeds, noxious weed species commonly require disturbance, bare ground openings, and reduced competition (early successional habitat conditions) for initial establishment. However, if established, the ability for weed species to out-compete existing native vegetation, to sustain its occurrence, and potentially alter native habitat functions is largely dependent on the habitat conditions and the life history, morphology, phenology, ecology, and reproductive biology of the individual weed species. Prevention and containment methods discussed above would be implemented.

136. Please include in your analysis the possible effects of noxious weed introduction on Sensitive plant populations and other components of biodiversity. Please include in the analysis the results of monitoring of noxious weed infestation from past management actions in the Forest.

FS Response: An analysis of possible noxious weed introduction on sensitive plants is found in Chapter 3 of the EA.

Effects of noxious weed introduction to biodiversity:

Invasive plant species are non-native plants that can inhabit and negatively alter native plant communities. A number of invasive plant species are recognized as noxious, meaning laws have been developed to restrict their spread and effect on the environment. Dry vegetation types and areas affected by road development, grazing, logging, fire, or other disturbances are most susceptible to weed invasion. Typically, invasive species have the ability to spread rapidly and reproduce in high numbers, which enables them to effectively crowd out native plant populations. Some can pose serious threats to the composition, structure, and function of native plant communities.

Noxious weeds and invasive plant species can pose serious threats to the components of biodiversity: composition, structure, and function of native plant communities (Olsen 1999). Soil disturbance from project activities may provide conditions for noxious weed invasion. Dry

site vegetation types and road corridors are also vulnerable, especially where recent ground disturbance has occurred.

Areas most susceptible to invasion by weeds are areas of severe ground disturbance (e.g., parking lots, gravel pits, roads, skid trails, horse corrals). However, once established on a disturbed site, many weed species can spread onto relatively undisturbed adjacent areas. Non-forested plant communities are also at high risk for invasion by weed species. Most forested communities are less susceptible to invasion and infestation by weed species because of the shade and competition for water and nutrients they provide (with the exception of orange and yellow hawkweeds). The cool-moist and cold site conditions that characterize 52% of the Valley Face project area may be less susceptible to invasion than other vegetation types. However, current noxious weed inventories indicate that some disturbed areas such as roadsides in the Valley Face project area have rapidly spreading infestations. Consequently, the project area is still vulnerable to weed establishment, persistence, and subsequent potential risk to native habitats. Invasive plant species are likely to establish and spread from adjacent disturbed areas such as the road corridors when new disturbances are created. Use of roads with existing weed populations during project implementation can facilitate weed establishment. Roads serve as travel routes for the main vectors of weed spread, specifically, cars and trucks, along with mountain bikes and horses. In addition, machinery can spread weed seeds if not washed prior to use. Design features include cleaning all off-road equipment prior to entering the area as well as seeding weed-free grass as soon as practical on skid trails, landings, burn piles, temporary roads, and roadsides with soil disturbance.

Olsen, B.E. 1999. Impacts of noxious weeds on ecologic and economic systems. In: Shelley, R.L. and J.K. Petroff (eds.) *Biology and Management of Noxious Rangeland Weeds*. Oregon State University Press. Corvallis, Oregon.

Monitoring and treatment effectiveness from past management activities:

Monitoring of the effectiveness of post-management treatments/controls on existing noxious weed occurrences and newly established occurrences are in development on the Flathead National Forest. Some preliminary data from 2004 and 2005 show a decrease in acres treated within several of the fire areas. A decrease of the proportion of treated acres within the managed area may be an indication of the effectiveness of the weed treatment.

	2004			2005		
	Treated Acres ^a	Managed acres ^b	% of managed area treated	Treated acres	Managed acres	% of managed area treated
Robert Fire	36.03	88	41	24.31	234	10
Wedge	20.91	373	6	17.66	118	15
Crazy	70.65	144	49	43.3	536	8
Westside Blackfoot Fire	29.22	373	8	63.74	636	10

a = treated acres is equal to the actual acres where herbicide treatment was applied

b = Managed acres is equal to the area weed crew surveyed for weeds to treat

Monitoring of the effectiveness of weed treatments has not historically been conducted after particular management activities. Only in the past several years, has the Forest begun conducting pre-activity weed surveys within project areas. Currently, the FNF is developing a forest-wide inventory of high-risk areas and project areas having high potential for weed introductions. This baseline data will assist with monitoring of the effectiveness of mitigation measures designed to reduce the potential of weed spread and new establishment within project areas. Baseline data and subsequent year monitoring will be entered in a national database (TERRA) for weed inventory and monitoring. Noxious weed population trends can be tracked within the database and correlated with treatments. Although currently the Forest is unable to make inferences from these data (as the database is newly developed), the Forest

does recognize that it is important to monitor and track the effectiveness of mitigation measures and treatments. The TERRA database will assist the Forest with a better understanding of the treatment effectiveness.

137. Please disclose how the productivity of the land has been affected in the project area and forest wide due to noxious weed infestations, and how that situation is expected to change in the coming years and decades.

FS Response: Productivity of the land is a difficult concept to address without more specifics in the comment since productivity could refer to plant growth, water quantities, wildlife populations, etc. Productivity could also mean ecosystem function. If so, noxious weed long-term establishment can alter physical and biological functions of a system by displacing native vegetation. The extent of the displacement is discussed in the Invasive Plants section of the EA. Also, see response to above on effects of noxious weed introduction to biodiversity.

Weed control efforts are likely to increase in the area as surveys have detected new and growing infestations resulting from other proposed and ongoing actions. Road closures have likely decreased the spread of weeds.

Cumulative effects of the project proposals would be greatly reduced by design features that will lessen the impact of weed spread; specifically, soil stabilization measures, revegetation of disturbed sites, and revegetation of constructed temporary roads.

Wildlife

138. This area is frequented by a variety of owls and song birds and consideration of this proposal's potential impacts on these birds and their habitat needs should be included in this review. We understand that Dan Casey formerly with FWP is a local resource and expert on these issues and should be consulted.

FS Response: The effects of the proposal on owls and songbirds and their habitats are discussed in the wildlife sections of the EA and project record. The 31 old growth associated wildlife species on the Flathead National Forest include the flammulated owl, boreal owl, chestnut-backed chickadee, Vaux's swift, Hammond's flycatcher, chestnut-backed chickadee, red-breasted nuthatch, pygmy nuthatch, white-breasted nuthatch, brown creeper, winter wren, golden-crowned kinglet, hermit thrush, Swainson's thrush, varied thrush, Townsend's warbler, and pine grosbeak (Exhibit Q-4). Cavity-nesters that use snags and other wildlife trees on the Flathead National Forest include (among several other species) the nuthatches, the chickadees, eight species of owls, violet-green and tree swallows, and western and mountain bluebirds (Exhibit Rd-2). Many owls and songbirds also use riparian and wetland wildlife habitats (Exhibits Rr2 and Rr-3), which have a section in the EA, as do Neotropical Migratory Birds (Exhibits Rn1 and Rn-2). Flammulated owls, which are in three of the above groups, are covered in more detail in the section on Sensitive, Threatened, and Endangered wildlife (Exhibits Rs-2 and Rs-14). Dan Casey is indeed a local expert on birds and his input and sightings have been incorporated in this and many other projects.

139. On winter range, leave a multi-storied stand; Douglas-fir needles are important winter feed for Whitetails.

FS Response: Multi-storied stand structure and Douglas-fir needles are both recognized as important to wintering white-tailed deer in this area. The effects of this proposal on deer and elk winter range is detailed in the EA section on Commonly Hunted Big Game and in project record Exhibits Rb-3, Rb-4, Rb-12, and Rb-13. Both Alternatives B and C would retain most of the large wind-firm trees and snags in all units as well as some of the smaller trees, which would help provide cover over time. During the development of Alternative C, all of the units in the "Bowser/Tally" winter range were considered for modification to address the concern that some of the treatments would negate winter thermal cover value. Some of these units were dropped or reduced in size in Alternative C and others were changed to have heavier retention of

overstory trees.

140. Mountain meadows are a sanctuary for several species of birds. The traffic and noise will disrupt this habitat immeasurably.

FS Response: For all wildlife species in the area, possible disturbance and consequent displacement was considered. For birds, see EA Chapter 3 sections on “Old Growth Habitat and Old Growth Associated Wildlife Species”; “Snags and Downed Woody Material Wildlife Habitat”; “Riparian and Wetland Wildlife Habitat”; “Sensitive, Threatened, and Endangered Wildlife Species”; and “Neotropical Migratory Birds.”

141. We are very concerned about the short and long term effect this project will have on regional wildlife.

FS Response: Effects of the alternatives on wildlife were evaluated in depth for this project. These are documented in Chapter 3 of the EA in sections on “Old Growth Habitat and Old Growth Associated Wildlife Species”; “Snags and Downed Woody Material Wildlife Habitat”; “Riparian and Wetland Wildlife Habitat”; “Commonly Hunted Big Game”; “Sensitive, Threatened, and Endangered Wildlife Species”; and “Neotropical Migratory Birds.” See also Exhibits Q-6, Q-7, Q-9, Q-10, Q-14, Q-15, Rb-1, Rb-3, Rb-4, Rb-7, Rb-8, Rb-9, Rd-1, Rd-3, Rg-7, Rg-8, Rg-9, Rr-3, Rs-2, Rs-3, Rs-8, Rs-10, Rs-16, Rs-22, Rt-5, Rt-6, Rt-10, Rt-11, and Rt-15.

142. Is it necessary to log parcels 32, 31, 31a, when the 1000 acres bordering them to the north have already been logged? Where is the thermal and hiding cover?

FS Response: The purpose and need of the project is met by treating fuels in these units, even though adjacent landowners may have treated fuels themselves. See the answer for comment number 116. As discussed in the Fire and Fuels section of the EA, heavy fuel accumulations even large distances from structures and private property can have an affect on fire spread by contributing fire brands and limiting firefighter effectiveness.

Maps of thermal and hiding cover for larger wildlife species, both currently and following implementation of the alternatives, are provided in Exhibits Rb-8 and Rb-9.

143. In the nineties I participated in monitoring sites on the district for reptiles and amphibians and understand that continuous work has been done in this area. Will this data be looked to in review of potential impacts to these populations and particularly the changes in micro climates created by forest cover disturbances?

FS Response: Amphibian and reptile monitoring data (Exhibit Rr-4) were considered during project development and effects analysis. Micro-climate effects are not anticipated on habitats surveyed for these species nor on other wetlands, as no vegetation manipulation would occur within Riparian Habitat Conservation Areas or riparian landtypes (Exhibits F-1 and Rr-3). Microclimate changes and potential squashing mortality was considered for the boreal toad, due to its use of upland habitat. See also the EA sections on “Riparian and Wetland Wildlife Habitat” and “Aquatic Species.”

144. The FS must disclose if the project area is within the range of any threatened, endangered, proposed, sensitive, or management indicator species, and how those species may use the specific areas now proposed for “treatment.” Please disclose the locations of all designated or proposed critical habitat for ESA-listed species, in relation to the project area.

FS Response: Exhibit Rt-1 lists the Federally threatened and endangered wildlife, fish, and plant species on the Flathead National Forest. The three tables in the Introduction section for Wildlife in the EA list all wildlife species that are threatened, endangered, proposed, sensitive, or management indicators and describe the historical and current presence of each in and near the project area. For wildlife, also see the EA sections on “Sensitive, Threatened, and Endangered Wildlife Species” and “Commonly Hunted Big Game.” Although they are no longer

considered Management Indicator Species, see the “Old Growth Habitat and Old Growth Associated Wildlife Species” section for information about the 31 species associated with old growth habitats. Exhibit Rg-4 provides information about the animal species of concern in Montana. For wildlife, see also the Biological Assessment for threatened and endangered species (Exhibit Rt-11), the Biological Evaluation for sensitive species (Exhibit Rs-3), the multi-scale assessment of animal community diversity (Exhibit Rg-1), and exhibits describing wildlife use of the Valley Face area (Exhibits Q-16, Rb-3, Rb-10, Rd-11, Rn-4, Rr-4, Rs-5, and Rt-7). The aquatic species section of the EA discusses the status of bull trout and cutthroat trout in the project area. The threatened and sensitive plants section of the EA discusses the status of the two threatened plants (water howellia and Spalding’s catchfly) and the sensitive plants that have potential to be in the project area.

145. Of special significance are the Loon nesting sites at the north end of Bootjack Lake.

FS Response: To avoid or minimize effects on loons nesting on Bootjack Lake, a screen of vegetation would remain along the lakeshore, and seasonal timing restrictions would be placed on activities in nearby timber harvest and fuel reduction units.

146. Numeration of and monitoring of specific small, non-game birds and animal populations that are important in keeping destructive insect populations at low levels must also be disclosed.

FS Response: Exhibits Q-16, Rd-11, Rn-4, and Rs-5 provide information about monitoring, populations, and occurrence of birds and mammals that feed on insects like bark beetles and insect defoliators.

147. This is also a pileated woodpecker nesting area, and last I've heard these are a threatened species also, as well as the ones the proposal indicates.

FS Response: The pileated woodpecker is not a Federally listed threatened, endangered, or proposed species (Exhibit Rt-1), nor a sensitive species (Exhibit Rs-3), nor a species of concern in Montana (Exhibit Rg-4). However, the pileated woodpecker is a “keystone” species that provides second-hand nesting holes for many other species. Effects of this project on pileated woodpeckers are discussed in the “Old Growth Habitat and Old Growth Associated Wildlife Species” section of the EA and in Exhibit Q-9. See also Exhibit Rg-1 for a broader-scale analysis for this species.

148. I am against any new roads, temporary or not. I have yet to find one full section on the map in the project area that does not already have a road on it. Where are the core areas for wildlife?

FS Response: Areas where wildlife can get away from motorized vehicles were analyzed in the context of elk security areas (Exhibit Rb-1 and the Commonly Hunted Big Game section of the EA). These are areas of at least 250 acres contiguous forested cover that are at least one half mile from any road open during hunting season. Such areas are limited in the Valley Face area, due largely to roads that access private land. The larger elk security areas are east of Mountain Meadows, in upper Rhodes Draw, in the Round Meadow area, and on Pete Ridge.

149. The FS has still not sufficiently dealt with the issue of fragmentation, road effects, and past logging on old-growth species' habitat. The EA/EIS must disclose the degree to which edge effects on old growth species' habitat exist, and how much total edge effect would be increased, by the alternatives.

FS Response: The effects on old growth habitat of fragmentation, roads, and past logging are described in the “Old Growth Habitat and Old Growth Associated Wildlife Species” section in Chapter 3 of the EA. For the analysis of road construction and use, also see Exhibits Q-15, Rd-1, Rg-5, and Rg-8. For the analysis of fragmentation, past logging, and edge effects of old growth habitat, see the response to comment #98, above.

150. Road 2920, which is closed seasonally for wildlife security, should be withdrawn from the proposal.

Wildlife in this area needs to be protected, and building a new road to log parcel 40 is unconscionable.

FS Response: Road 2920 would remain seasonally closed to motorized public access during logging. This road is necessary to use as a haul route for the treatment of Units 39, 40, and 41 and access to Units 22a and 306. These units are proposed as components of the alternatives to meet the purpose and need of the project. Unit 40 and Temporary Road 10 (which would be needed to access Unit 40) are not features of Alternative C.

151. The analysis must cover a large enough area to include a cumulative effects analysis area that would include truly viable populations. Analysis must identify viable populations of MIS, TES, at-risk, focal, and demand species of which the individuals in the analysis area are members in order to sustain viable populations.

FS Response: The spatial and temporal scale of the analysis of cumulative effects was carefully determined for each species or habitat, as described in the wildlife sections of the EA and project record. These areas are large enough to include the home ranges of the species and to represent the effects of fires, natural tree mortality, timber harvest, fuel reduction, and other factors across the landscape. They are sufficiently large to evaluate the ability of the habitat to support populations of these species, but small enough to not obscure the effects of the alternatives. Exhibit Rg-9 summarizes all of the known cumulative effects considerations for wildlife. Exhibit Rg-1 is an in-depth assessment of habitat for all MIS and TES species and other wildlife and their habitats at multiple scales, including that of the Flathead National Forest. While factors outside of the Forest Service's control (past fire suppression, drought, subdivision and housing development, etc.) may have negative effects on these species and their habitats, the actions proposed in the Valley Face Fuels Reduction Project are consistent with the Flathead Forest Plan and are consistent with maintaining habitat for diverse wildlife populations at all scales. It was determined that there would be no impact on the population viability of any species. The determination of viability is associated with sensitive species and the 1982 NFMA planning rule does not specifically address at-risk or focal species.

152. Leave lots of snags for cavity-nesting birds.

FS Response: The importance of snags and other wildlife trees is described in the Chapter 3 EA section on "Snags and Downed Woody Material Wildlife Habitat" and in Exhibit Rd-4. Prescriptions for timber harvest and fuel reduction for this project incorporate many measures to help maintain these habitat structures in the units over time. For example, all live and dead larch and ponderosa pine greater than 18 inches at DBH and most of the Douglas-fir greater than 25 inches DBH would be left standing unless this would compromise woods worker safety. Many wind-firm green trees would be left unharvested to help ensure that an adequate amount of cavity habitat and large woody material are available over time. All snags deemed to be hazardous could be felled in these areas, although they would be left on-site.

153. The fact that the Flathead NF has not monitored the population trends of its old-growth management indicator species (MIS) as required by the Forest Plan bears important mention here. The Flathead NF has failed to ensure viability of MIS and TES species to date.

FS Response: The proxy-on-proxy approach is appropriate for ensuring species viability and is used both to monitor trend and for assessing viability. This approach uses Management Indicator Species (MIS) as an indicator for other species (the first level of proxy), and habitat capability (the second level of proxy) as an indicator for viability of the MIS. Crucial to this approach is that the methodology for the habitat proxy be sound and that the habitat is well-distributed and of sufficient quantity. The analysis in the EA of effects on sensitive and other species or habitats of concern ends with a conclusion by the analyst whether the project would cause a population viability concern, with more information about effects analysis for each species or habitat in the Project File (Exhibits Q-7, Q-10, Q-13, Q-14, Q-15, Rb-1, Rb-3, Rb-4, Rb-

7, Rb-8, Rb-9, Rd-1, Rd-3, Rg-7, Rr-3, Rs-2, Rs-3, Rs-8, Rs-10, Rs-16, Rs-22, Rt-5, Rt-6, Rt-10, and Rt-11). Exhibit Rg-1 also includes the assessment of animal community diversity for the Flathead National Forest. This assessment was done at multiple scales, including the Forest and Regional scales, and explains how/why we believe viable populations would be maintained. It was determined that viability of any wildlife species is not at risk after a full investigation on the effects of the proposed action and additional cumulative impacts. Further, the analysis did not show that the proposed project would preclude individuals from interacting with others in the planning area. A section in Chapter 2 of the EA describes monitoring that would be done in conjunction with the Valley Face Fuel Reduction Project. Several exhibits in the project record provide information about monitoring results and other observations of wildlife species in and near the Valley Face project area. These are Exhibits Q-16 (old growth associated species), Rb-10 (commonly hunted big game), Rd-11 (species using snag and downed wood habitats), Rn-4 (Neotropical migratory birds), Rr-4 (species using riparian habitats), Rs-5 (sensitive species), and Rt-7 (threatened and endangered species). Such observation and monitoring records were used to establish the reliability of the habitat models for the proxy-on-proxy approach.

154. Snags are crucial for wildlife. Areas that have snags should be removed from the project.

FS Response: See the response to Comment #152, above. High-quality wildlife trees and snags are included in the factors timber crews watch for when locating unit boundaries on the ground and identifying areas of exclusions. These crews will be notified of known areas with high-quality wildlife trees.

155. How will logging do anything but exacerbate the problem with too little thermal cover for big game?

FS Response: Thermal cover for big game is not limited across the entire the Valley Face area. Despite past regeneration harvests and conversion of private lands to agriculture, forested thermal cover occupies over 42% of the analysis area (Exhibit Rb-8). Another 35% is in younger forests that have regrown enough to provide hiding cover but lack enough overstory to also be thermal cover. For more information on thermal cover in the Valley face area, see the EA section on Commonly Hunted Big Game and Exhibits Rb-3 and Rb-4, Rb-12.

156. Multi-story stands are more valuable as wildlife habitat.

FS Response: Multi-storied stands are used more by some wildlife species and less by others, which reinforces the need to have a diversity of conditions across the landscape. Working within the context of considerable diversity within and between stands proposed for treatment, both Alternatives B and C would retain most of the large wind-firm trees and snags in all units as well as some of the smaller trees.

157. The units adjacent to Mountain Meadows will impair the ability of wildlife to access the meadow and creek.

FS Response: Some wildlife could be displaced during active timber harvest and fuels reduction. However, wildlife use of the meadow and creek in the Mountain Meadows area is not expected to be altered by changes in vegetation in the proposed units in the area. Forested cover would remain on all sides of the meadow after treatment. Alternative B would leave less of this cover than would Alternative C, which drops Unit 21A and most of Unit 7, and changes a strip east of the meadow from a shelterwood harvest to a commercial thin.

158. Our lands and others in this project area have been placed in conservation easements in part in recognition of the important connectivity it provides for wildlife from the valley floor to the higher forested lands. Identification of these easements and the connectivity they provide for wildlife should be complimented in the treatment prescribed for adjacent forest service lands. Private land owners should be made aware of critical wildlife areas that could benefit from additional conservation easements.

FS Response: Connectivity was analyzed in depth for this project, as described in the response to Comment #98 above. No forested linkages to private lands with conservation easements would be severed by this project. However, forested areas on Forest Service lands were considered equally important whether or not they access private lands with conservation easements in place.

159. Wildlife sightings in Mountain Meadows are common, including moose, grizzly bears, elk, and numerous species of birds. How many years before these species would return following completion of this project?

FS Response: Although movement patterns and site-specific habitat use by wildlife may be altered during proposed activities, they are not expected to leave the area. The interior of areas of regeneration harvest near Mountain Meadows (Units 9A, 21, 21A in Alternative B) would likely be used less by species like elk, moose, grizzly bears, and Canada lynx for approximately 15 years, when sapling cover has regrown. Other species, including white-tailed deer, bluebirds, Townsend's solitaire, olive-sided flycatcher, and many others, are likely to increase their use of regenerated, more open areas.

160. An in depth analysis needs to be done to protect all wildlife populations.

FS Response: This analysis is found in the seven wildlife-related sections of Chapter 3 of the EA. Please also see the response to comment #141, above.

161. The deer and other wildlife need this area for cover and thermal shelter. Removing canopy will harm the most productive deer population in the state.

FS Response: The effects on hiding and thermal cover values are displayed in the EA section on Commonly Hunted Big Game and in Exhibits Rb-1, Rb-3, Rb-4, Rb-8, and Rb-9. Please see the response to comment #139, above, for more information specific to effects on wintering deer.

162. 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 Flathead NF makes it imperative that population viability be assessed at least at the forest wide scale (Marcot and Murphy, 1992).

FS Response: Exhibit Rg-1 includes an in-depth assessment of habitat for old-growth associated wildlife species at multiple scales, including that of the Flathead National Forest. This document states that "the primary threats to species using old growth habitats are habitat loss and fragmentation from timber harvest and stand-replacing fire." While factors outside of the Forest Service's control (past fire suppression, drought, subdivision and housing development, etc.) may have negative effects on species using old growth habitats, the actions proposed in the Valley Face Fuels Reduction Project are consistent with the Flathead Forest Plan (Exhibit Q-13) and appear to be consistent with maintaining habitat for diverse wildlife populations at all scales. It was determined that there would be no impact on the population viability of old growth associated wildlife species. Also see the "Old Growth Habitat and Old Growth Associated Wildlife Species" section of the EA.