Stonewall Vegetation Project
Helena National Forest

Scoping Summary – June 7, 2011

The initial 'scoping' conducted in January of 2010 received 80 comments from our interested publics. Table 1 lists the letter's number (used as a reference later in this report) tied to names of the individuals, organizations, and agencies that provided comments from scoping for the Stonewall Vegetation Project, Helena National Forest.

Table 1. Scoping contacts Stonewall Vegetation Project

Letter #	Name
1	Jean Public
2	Chris Castagne
3	Dick Artley
4	Steve Flynn, Sun Mountain Lumber
5	Michael Garrity, Alliance for the Wild Rockies and Sara Johnson, Native Ecosystem Council
6	Larry Hoffman, Lincoln County Weed Coordinator
7	Bob Bushnell
8	Chris Castagne
9	Richard Debick
10	Don Doyle
11	KD Feeback
12	Dale Gardner, Helena Trail Riders
13	Melvin and Charlette Hagan
14	Bill Hammer
15	Kelly Ingalls
16	Orrin Johnson
17	Richard Juntunen
18	Marc Kneedler
19	Marvin P. Love
20	S.J. Maras
21	Susan Murphy
22	James L. and Maida Paris
23	Harry Poett
24	Ellen Simpson, Mt Wood Products Association
25	Pauline Webb
26	Capital Trail Vehicle Association
27	Ann and Les Bramblett
28	Thomas Kindrick
29	Jim Palagi
30	Bob and Jan Braico
31	Daniel S. Comer
32	Duane Halverson
33	Steven Kloetzel
34	Joe Marino

Letter #	Name
35	Robert Petritz
36	Marc S. Ryckman
37	Nelson Wert
38	Jim Fortune
39	Julie Fortune
40	Albert Clark
41	Miles Partin
42	Phyllis Clark
43	Linda Pope and Bruce Baker
44	Robert Ruthemeyer
45	Richard Thieltges
46	Becky Thurman
47	Joe Baze
48	Jerry Burns
49	Charles Sherman
50	Jim Suek
51	Mrs. K Reeve
52	Ray Geist
53	Julie A. Dalsoglio, US Environmental Protection Agency, Region 8
54	Diana Reichenberg
55	Lu Gardella
56	Dick Noel
57	Sharon Paul
58	Gary Lee Petersen
59	Emily Rundell
60	Ellen Mulcare
61	Don Pettit Sunny Slope
62	Jeanette Nordahl
63	Robert Berry
64	Heidi Bray
65	Kim Gray
66	Sarah Johnson, Native Ecosystem Council - Michael Garrity, Alliance for the Wild Rockies
67	Gary E. Sutton Sr.
68	DeWayne Williams
69	Gregg Brittain
70	Mr. and Mrs. Mark Aquino
71	Lincoln Restoration Committee
72	Montana Fish, Wildlife and Parks
73	Paul N. Spengler, TRICO
74	Stan Frazier, Helena Hunters and Anglers
75	Janey Holm
76	Bill Koehnke
77	Teresa Martinez, Continental Divide Trail Alliance
78	Wayne and Rebecca Shong, B&W Ranch
79	Andrea Stinson
80	Jerry and Ruth Massee

The scoping document listed preliminary issues considered during development of the proposed action:

1. Restoration of vegetation communities
2. Grizzly bear habitat
3. Lynx habitat
4. Wildfire hazard, risk, and fuels
5. Habitats including ponderosa pine, western larch and aspen

The scoping document noted proposed actions are anticipated to benefit the project area in the following ways:

- Restore ponderosa pine, dry Douglas-fir, and western larch sites to a more natural fire regime condition
- Maintain vigor and restore aspen groves
- Enhance wildlife habitat conditions

Summary of public scoping comments

Table 2 displays the summary of public comments received during scoping identified by letter number (see table 1), and then by comment number from within each letter. Table 2 also includes each comment's main topic, and the Forest Service response to the comment as well as identification of significant issues. The comments from public scoping identify those issues that may have a significant cause-effect relationship with the proposal, and determine the scope of issues addressed in specialists' analyses. The evaluation of these issues may also be the 'driver' or foundation of developing additional alternatives. This discussion of issues is based on the approach in the April 1, 2011 FSH 1909.15 (12.41).

Of the 80 scoping responses received, 30 were in support of the proposed project activities. The majority of responses suggested information to include in the analysis documents, identified language to clarify, or listed elements pertaining to a specific resource to include in the effects analyses. The final resource specialists' reports would include this information as well as the analysis of the project effects on the various resources. The resource specialists' reports would be filed in the project record and incorporated by reference and summarized in Chapter 3 – Affected Environment and Environmental Consequences of the EIS.

Eight responses expressed concerns or suggestions regarding travel management of area roads and motorized winter recreation opportunities. The Stonewall Vegetation Project is not a travel planning project and does not propose to change the permanent road system in the project area. Travel management of existing routes is being addressed in the ongoing analyses "Blackfoot-North Divide Winter Travel Plan" and the "Blackfoot Travel Plan (non-winter)".

A few responses included items of literature to be considered, some noted as opposing science information. As part of the analysis for this project, resource specialists will review and consider relevant scientific literature, including submitted articles. The literature review would be included and filed in the project record.

Comments/Issues that Warrant the Development of Additional Alternatives (Significant Issue):

Table 2 includes a full listing of comments received during scoping, by letter and comment number (denoted by L#, c#). The interdisciplinary team reviewed the comments received during scoping and identified one significant issue theme (see below). We also reviewed the proposed activities and it was determined appropriate to develop an alternative to address the following significant issue:

Wildlife Habitat: Proposed actions may impact habitat for: threatened, endangered and sensitive species and designated critical habitat; management indicator species (MIS); and big game hiding cover, thermal cover, and security cover. The public also commented on habitat connectivity. The public is also concerned about viability of old-growth and snag-dependent species.

Scoping letters and comments pertaining to this issue: L5, c22; L66, c2, 3, 5, 6, 27, 28, 38; L74, c74

Indicators:

- Total and open-road density during and after activities within the project area relevant to grizzly bear habitat and elk habitat
- Acres of elk hiding cover, thermal cover, and security habitat within the project area and elk herd units
- Acres of lynx habitat or other species that utilize multi-storied forest habitat within the project area
- Maintaining or providing habitat connectivity
- Acres by type of treatment by alternative versus no treatment
- Acres of old growth affected and effects to snag dependent species
- Acres of suitable MIS and sensitive species habitat impacted

Analysis Issues

In addition to the significant issue identified above, we would analyze the effects of the proposed action and alternatives based on the following issues to display differences between alternatives:

Weed Spread/Infestation: Proposed actions may disturb landscapes allowing existing weed populations to expand or allowing additional species to become established.

Scoping letters and comments pertaining to this issue: L5, c2, 3, 4, 5, 29; L33, c33; L48, c17; L62, c1; L71, c10

Indicators:

- Acres by type of treatment by alternative versus no treatment
- Acres of ground disturbance
- Costs of weed treatment by alternative

Use of roads that would be built then obliterated immediately following timber removal and use of existing roads: Comments indicated concern for the effects to soil, water quality, fisheries, and wildlife habitat from roads that would be built then obliterated immediately following timber removal, road reconstruction, and use of existing roads.

Scoping letters and comments pertaining to this issue: L3, c12; L66, c34, 35, 36; L71, c9

***Indicators**:*

- Miles of roads that would be built then obliterated immediately following timber removal
- Miles of roads that would be built then obliterated immediately following timber removal and reconstruction of existing roads within the INFISH buffers
- Number of new stream crossings
- Miles and location of haul routes

Amount of Prescribed Fire: Concern that the Forest Service has limited experience implementing prescribed fire in mixed-severity fire regimes. Concern with the amount of acres proposed for prescribed burning; proximity to private land and timing of burns introduce risk to private lands (e.g., loss of homes, buildings, smoke effects to air quality).

Scoping letters and comments pertaining to this issue: L1, c3; L57, c1; L75, c4; L79, c1; and public meetings

***Indicators**:*

- Acres of prescribed fire immediately adjacent to private land and the qualitative values of risk and potential consequences
- Acres of prescribed fire by fire regime within the project area
- Acres and type of pretreatment prior to use of prescribed fire
- Estimated emissions from burning

Other Issues

The following lists other issues considered in the analysis; however, they did not rise to the level of significant issues. The proposed action is not expected to have significant impacts on these issues. The effects are limited in intensity and context. For some of these issues, potential impacts are limited through project design. Analysis of potential effects related to these issues would be addressed in Chapter 3; however, analysis may not be as in-depth as for the significant issue. The Forest Service response follows each issue.

Some members of the public feel use of timber harvest, including regeneration harvest, to achieve restoration goals is a contradiction.

Scoping letters and comments pertaining to this issue: L1, c2; L3, c4, c7; and public meetings

> Timber harvest and prescribed burning are means to diversify areas to achieve broader restoration goals across the landscape. To promote a resilient forest a combination of treatments to restore the broader landscape were considered. The proposed action includes regeneration harvests for some areas where the majority of the existing overstory trees have been killed by bark beetles.

Due to the amount of mortality caused by insects and/or diseases across the Stonewall Vegetation Project area, restoration opportunities exist to reforest lands for the following purposes:

- Establishment of tree species most able to cope with disturbance
- Promote a diverse species mix as well as genetic diversity
- Promote desired species distribution across the Stonewall Vegetation Project area
- Enhance regeneration of forested lands to create diverse structures across the Stonewall Vegetation Project area
- Manage for species persistence within/across the Stonewall Vegetation Project area
- Maintain adequate seed bank of desired species

Resource effects would be noted in Chapter 3 of the DEIS, e.g., wildlife habitat elements that may be affected and how the proposed actions may restore those habitat elements. The proposed actions may have short-term adverse impacts with long-term benefits for some resources.

Merchantability and Economic Feasibility of Harvest - trees being dead too long, agency action/response too slow.

Scoping letters and comments pertaining to this issue: L4, c4; L33, c3; L35, c1

Insect-caused mortality effects are greater than anticipated when the project started. Fuels reduction in wildland urban interface (WUI) and restoration goals throughout the broader landscape have benefits that would be realized through the proposed actions. In the fall of 2010, timber industry representatives made an on-site field review of forested areas on the Lincoln Ranger District experiencing insect-caused mortality. Industry representatives indicated timber merchantability is still present and anticipated to be present at the time of contract award (A.Kamps, personal communication).

Proposed treatments will increase sediment and adversely affect cutthroat trout habitat.

Scoping letters and comments pertaining to this issue: L5, c 23, 26, 27, 28, 30; L16, c1

Effects to fisheries would be discussed in Chapter 3 of the DEIS. The proposed action would include the best management practices (BMPs) to ensure proper drainage and reduce potential increases to sediment from proposed activities. The INFISH management direction would be incorporated to reduce potential effects to cutthroat trout habitat. A literature review and local Forest monitoring of BMP effectiveness would be discussed in Chapter 3 of the DEIS.

Additional Public Concerns

The following is a summary list of additional public concerns considered in the analysis of issues; however, they did not rise to the level of significant issues. The proposed action is not expected to have significant impacts on these issues. The effects are limited in intensity and context. For some of these issues, potential impacts are limited through project design. Analysis of potential effects related to these issues would be addressed in Chapter 3; however, analysis may not be as in-depth as for the significant issue.

These other issues were expressed as concerns. Individual responses to comments are located in Table 2. There are concerns that:

- Ground disturbance and prescribed fire in the Historic Lincoln Townsite could result in loss of the historical integrity of this site
- Dust from increased road use could temporarily reduce sight-distance and cause safety concerns on native and aggregate surfaced roads used for timber hauling
- Removal of commercial-sized timber and thinning treatments to reduce hazardous fuel conditions may increase fine fuels on the ground that exacerbates fire behavior and increases fire risk
- To ensure project effects are appropriately disclosed, the analysis needs to use the best science available, disclose ecological liabilities from past actions, incorporate past monitoring information, and address conflicting science literature brought forward by the public during scoping
- Ground disturbance from timber removal and prescribed fire may impact threatened, endangered, rare and sensitive plant, animal and fish species, or their viability within the project area
- Proposed timber removal and prescribed burn activities could exacerbate climate change due to the loss of carbon storage
- Control lines used for prescribed burning in the inventoried roadless areas may increase unauthorized motorized use into new areas, which could affect the inventoried roadless character
- Evaluate if jobs would be available due to the proposed actions
- The proposed use of fire is going to require a major educational effort before it is acceptable to many of the residents
- Proposed activities should allow for multiple uses, and timing may impact recreational users (road and trail users, campers, berry picking), areas should be open for firewood gathering prior to burning
- Concern that proposed treatments may have a visual impact, especially along property lines and in-holdings
- Proposed timber removal may change densely vegetated areas that currently prevent livestock movement and change grazing patterns in the project area

Some concerns raised for the Stonewall Vegetation Project were outside the scope of the proposed action, or decision to be made, or were already decided by law, regulation, Forest Plan, or other higher level decision. Individual responses to comments are located in Table 2. These items included:

- Management of private lands including building locations and vegetation management. Insurance of private structures
- Terminology, wording and phrasing used in scoping document
- Scope of the Purpose and Need
- Designating the contracting process (stewardship and size of commercial harvest sales) for potential implementation of project activities
- Developing a detailed long-term program for maintaining the safer conditions, including how areas would be treated in the future following proposed treatments, or how areas not needing treatment now would be treated as the need arises
- Travel management concerns regarding the existing National Forest System roads being analyzed under the Blackfoot –North Divide Winter Travel Plan and Blackfoot Travel Plan (non-winter).
- Items related to Forest Plan programmatic direction (e.g. long-term fire management plans, roadless area evaluations)
- Need to update allotment management plans

- Allocation of funding
- Staffing of controlled burns; this would be addressed through the site-specific burn plan
- Explore monitoring partnerships

Specific Alternatives Suggested for Consideration in Public Comments and Forest Service Response

Maximize timber harvest and fuels reduction activities, particularly in the WUI. (L1, c2)

The WUI was identified during development of the "Tri-County Regional Community Wildfire Protection Plan" (2005). The proposed action was designed to address fuels concerns on National Forest System lands adjacent to private lands. Treatments on private lands are outside the scope of our proposed action, but past, current and planned treatments would be considered in the individual specialist's cumulative effects reports, where applicable.

We reviewed the project area to identify potential vegetative treatments based on site conditions.

This alternative would be similar to the proposed action, and would not be analyzed in detail.

The roadless areas within the project area were created by the Rare 2 process identifying possible additions to the wilderness system. Management should reflect this quality. In addition, burning whitebark pine seedling and sapling areas, present in the roadless areas, could reduce white bark pine habitat, an important food source for grizzly bears. Consider an alternative that does not include prescribed burning in the roadless areas, but allows for the use of natural prescribed fire without mechanical treatments, including cutting trees and brush, in the roadless areas. (L5 c7; L48 c8)

The large prescribed burn units in the roadless areas are proposed to improve the mix of vegetation composition and structure across the landscape making it more diverse, resilient, and sustainable to wildfire and insects. In particular, the burns in the roadless areas would be designed to encourage whitebark pine regeneration in proximity to existing mature whitebark pine trees. Portions of some units are lacking adequate ground fuels to carry fire across the desired burn unit locations. Without the prep work, burn prescriptions could not be implemented and fire lines could not be prepared.

For any action alternative, design features could be incorporated to exclude large concentrations of whitebark pine regeneration from burning, and protect mature whitebark trees that may provide seed sources.

The no action alternative does not include slash treatments or prescribed burning in the roadless area and would address this issue.

This alternative would not address the purpose and need to improve the mix of vegetation composition and structure, or modify fire behavior to create conditions that allow the reestablishment of fire as a natural process across the roadless area portions of the landscape. This alternative was eliminated from detailed analysis.

Burning activities proposed may char merchantable timber and decrease its value in areas managed for timber products. Consider an alternative that does not include prescribed burning in areas managed for timber products. Prescribed fire units in management areas T1-5 include all of units 2 and 78, and portions of units 77, 79, 80, 81, 84, 85, 86 and 87. (L79, c2, c3)

The Forest Plan identifies prescribed burning as an appropriate tool for vegetation and fuels management (pages II/33 – 34), and the Forest Fire Management Plan direction in place at the time of implementation would be followed. The no action alternative would include no controlled burning in areas managed for timber products.

This alternative would not address the purpose and need to modify fire behavior to enhance community protection while creating conditions that allow the reestablishment of fire as a natural process on the landscape. Therefore, this alternative was eliminated from detailed analysis.

Proposed actions may disturb landscapes allowing existing weed populations to expand or allowing additional species to become established. Consider an alternative that eliminates units that have noxious weeds present on roads within units from fire management proposals. (L5 c2)

The Forest Weeds FEIS (USDA Forest Service 2006) identified most of the roads in the project area for weed monitoring and treatment due to the presence of weeds. Appropriate preventive measures would be incorporated in the project design features including post treatment spraying of landings in year 1 after mechanical treatment, and monitoring at years 3 and 5, with retreatment if needed.

The no action alternative addresses this suggestion.

Eliminating units with noxious weeds would eliminate fire management treatments in all units in the WUI accessed by existing roads. Not treating areas within the WUI would not enhance community protection. This alternative would not meet the purpose and need for the project of modifying fire behavior to enhance community protection while creating conditions that allow the reestablishment of fire as a natural process on the landscape.

Eliminating the units within the WUI would not meet the purpose and need for the project of modifying fire behavior to enhance community protection. In addition, the appropriate project design and mitigation of relevant best management practices would be applied to any developed action alternative. Therefore, developing an alternative that eliminates units that have noxious weeds present on the roads within them from fire management proposals is not necessary. This alternative would not be considered in detail.

Public comments noted the continued loss of motorized recreational opportunities as a primary concern. A recommendation was made to consider a Pro-Recreation Alternative that would address recreation opportunities and include the following characteristics (L26 c1, 2, 4):

1. *Dispersed camping within 300 feet of all existing routes*
2. *Use of seasonal closures, where required, to protect the environment and wildlife with the intention of keeping routes open for the summer recreation season*
3. *All of the existing routes are needed as OHV routes due to the cumulative effects of all other closures*
4. *Additional OHV routes are needed to address the growing popularity of OHV recreation and the greater needs of the public for access and motorized recreation*

Effects to recreation resources would be addressed in analysis and project design features would be included to minimize potential impacts to recreation opportunities within the project area.

Travel management is being evaluated in the current Blackfoot Travel Plan (non-winter) and the appropriate project design and mitigation of the relevant best management practices would be applied to any developed action alternative. Developing a Pro-recreation

alternative with additional OHV routes was considered, but this would not address the purpose and need identified for this project for fuels reduction in the WUI or restoration across the landscape. Therefore, this alternative was eliminated from detailed analysis.

Consider a watershed or ecosystem restoration alternative or incorporate restoration elements in the alternatives considered. (L53 c6, 10, 11)

The Stone Dry Watershed Assessment (2009) was considered when developing the proposed action. The purpose and need includes a restoration element. The proposed action was designed to incorporate treatments that move the project area towards a more resilient forest to address restoration of vegetative composition and structural diversity elements. Effects to vegetation and watershed resources would be discussed in Chapter 3 of the EIS.

Watershed restoration and reducing sedimentation is often focused on changes to roads, and includes fixing drainage structures, road design or decommissioning roads. Changes to existing road alignments and decommissioning existing roads are being evaluated in the current analysis for the Blackfoot Travel Management Plan (non-winter) and therefore not being considered in this proposal.

Since many of the watershed elements of concern are being evaluated in the current Blackfoot Travel Plan (non-winter), and the appropriate project design and mitigation of relevant best management practices would be applied to any developed action alternative, a true or purer watershed restoration type alternative is not necessary; therefore, this type of alternative will not be considered in detail.

Summary of Public Comments and Forest Service Response

Nonsignificant issues are categorized as those: (1) outside the scope of the proposed action, or decision to be made; (2) already decided by law, regulation, Forest Plan, or other higher-level decision; (3) comments pertaining to disclosing the effects to various resources, which are addressed by the specialists' analyses and the discussions in the draft environmental impact statement (DEIS); or (4) comments in support of the project.

Table 2 Scoping comments and responses for Stonewall Vegetation Project

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
1	Private land	1. Stop allowing home owners to build near the forest. Simply zone out those areas as home sites. let home owners who insist on building there know that there is always a possibility of fire - and try to change their minds and you can do that	This analysis pertains to the management of National Forest System lands. Management of private lands is outside the scope of this analysis and beyond the purpose & need of this analysis.		**Nonsignificant issue (1)**
1	Restoration	2. I am in favor of letting the survivor trees that are growing there continue to grow. They seem to be taking advantage of what grows there and they should be left alone. What used to grow there grows there no longer and spending huge sums of tax dollars for that purpose is a waste.	The no action alternative addresses leaving survivor trees alone. Proposed treatment prescriptions in the Stonewall vegetation project include either thinning treatments where many trees that have survived the recent bark beetle epidemic would be retained or regeneration treatments where some live trees would be retained for shelter and as a seed source.		**Nonsignificant issue (3)**
1	Prescribed Burning Air Quality	3. It isn't the "smoke" which you can see easily, but it is the fine particulate matter which needs a microscope to [s]ee it gets into American citizens bodies and kills and injures them. You are causing health problems when you burn. Stop harming fellow Americans now.	Air quality impacts, including smoke from proposed burn activities, would be analyzed and a summary of the effects anticipated under all alternatives would be included in the DEIS. The no action alternative addresses no prescribed or pile burning. The Montana/Idaho Airshed Group coordinates burning on all forest and range lands. They analyze information for proposed burns, meteorology and air quality and decide if restrictions to burning are needed. The airshed group is comprised of members of regulatory health agencies and those that conduct extensive prescribed burning. Burning would be dependent upon site conditions and weather conditions, and is generally anticipated for fall of the year. Notice of the pile and prescribed burning timeframes, or burn windows, would be shared with the public through paper notices and	Alternative 3 proposes a reduced level of prescribed burning, and therefore reduces total impacts. The No Action Alternative would not include prescribed burning.	**Nonsignificant issue (3)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
			announcements on the Forest website. Local notices would be attempted to ensure people are aware of the burning activities. Smoke sensitive receptors would be identified and modeling outputs will show impacts to these areas. Smoke management techniques such as phase burning and the time of year burns are ignited are designed to reduce smoke impacts.		
2	Support for the Project	1. I do believe with projects like this one, our outcome would be far more positive than doing nothing.	Thank you for your support		**Nonsignificant issue (4)**
3	Opposing Science	1. To restrain you from ignoring the opposing science attached to this letter, I will educate you on 5 recent court cases dealing with opposing science. I expect you to comply with the precedence set by these cases. As you can see from reading the judge's opinions in the 5 court cases below, you must respond to each scientific statement individually. In doing so you have several choices: 1) Tell the public that the opposing science statement does not apply to your project and explain why. 2) Tell the public that the science statement is not true and explain why. 3) Tell the public that the science statement is true and applies to your project; however you choose to ignore it as you plan your project. If this is the case, you MUST explain why. 4) Tell the public that the scientist(s) making statements that oppose your project are not recognized by the USFS as real scientists. If this is the case, you MUST provide the reader with your reasons. I will then email your reasons to the scientist. 5) Tell the public that the science statements have not been peer reviewed. If this is done, the USFS	Literature submitted in response to scoping would be reviewed and considered by the interdisciplinary team, with other relevant literature for this analysis. The literature review would be available in the project record. The literature review would discuss why literature is relevant or not relevant to the project.		**Nonsignificant issue (3)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
		line-officer must omit all references used to support the project that are not peer reviewed. I highly recommend that you read these 5 opinions in their entirety. The links are included after a key quote from the judge's opinion. League of Wilderness Defenders et al. v. Elaine Marquis-Brong. In the United States District Court for the District of Oregon, Judge Ancer L. Haggerty,Civil No. 02-75-HA. April 18, 2003, League of Wilderness Defenders et al. v. United States Forest Service. In the United States District Court for the District of Oregon, Judge Ancer L.Haggerty, Civil No. 04-488-HA. November 19, 2004, and Blue Mountains Biodiversity Project et.al v. Blackwood, 161 F.3d 1208, 1211 (9th Cir.1998). Betty B. Fletcher, circuit Judge. Appeal from the United States District Court for the District of Oregon Ann Aiken, District Judge, Presiding, this direction is clear. Center for Biological Diversity v. U.S. Forest Service, 349 F.3d 1157 (9th Cir. 2003). Donald C. Pogue, circuit court Judge. Appeal from the United States District Court for the District of Arizona, Robert C. Broomfield District Judge Presiding. Friends of the Clearwater et al. v. D. Robert Lohn et al., In the United States District Court for the District of Idaho, Judge Edward J. Lodge, CV04-384-C-EJL, March 31, 2005.			

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
3	Scoping letter is vague	2. Nowhere does your scoping document tell the public the total acres that would be logged and the total acres that would be burned all in one place. On page 4 the public must struggle with 8 different groups to determine what will really occur in each group in the treatment descriptions. Your proposed action for the timber sale should be obvious to the public!	The proposed action descriptions would be reviewed and revised, where needed, to better display the proposed harvest and broadcast prescribed burn information. These figures would be clearly displayed in Chapter 2 under alternatives comparison tables of the DEIS.		**Nonsignificant issue (3)**
3	Fire behavior	3. To any thinking person, the notion of removing commercial-sized timber to reduce the risk of wildfire is ridiculous. It is the fine fuel that carries a fire. Even more importantly, the weather determines the size, intensity, flame height and rate of spread of a wildfire. In your FEIS please include the science showing that fuels is more important in determining fire behavior than weather. See science attachment # 3.	Effects to fire/fuels would be analyzed in the fire/fuels report and would be summarized in Chapter 3 of the DEIS. Fire models used to analyze potential changes to anticipated fire behavior (e.g., flame length) would be discussed in the DEIS. Existing fire models consider various factors including existing and activity created fuels and the larger dead trees that are anticipated to fall over time. Opening the forest canopy can reduce crown fire potential which would be discussed in Chapter 3 of the DEIS. The no-action alternative and the untreated areas in any action alternative would display the effect of leaving existing trees and the potential crown fire anticipated. Both fuels and weather contribute to fire behavior		**Nonsignificant issue (3)**
3	Insects	4. Insect activity in a forest is an indicator of a properly functioning forest. The survival of some species of birds is dependent on forest insects. Let Nature play out her cycles that have occurred for thousands of years. This includes insects!	The project area contains areas of mortality that are not proposed for treatment The effects to various bird species including management indicator Pileated and hairy woodpeckers along with migratory birds would be analyzed. Untreated areas in the project area would continue to provide habitat for species associated with insect activity. The activities of insects are a natural process in western forests, and the scale and frequency of insect activity can be an indicator of a properly functioning forest. However, the recent bark beetle epidemic in the western United States is of a magnitude never before recorded, and can be considered an indicator of unhealthy forest conditions created by decades of fire exclusion that resulted in very large expanses of forest becoming		**Nonsignificant issue (3)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
			high risk at the same time, as stated in the project scoping letter. This subject would be discussed in the silviculture section, and would be summarized in Chapter 3 of the DEIS.		
3	Wildland Urban Interface	5. Community protection," give me a break. You are proposing to log 4 miles from the town of Lincoln and you actually think it will reduce the risk of fire damage to homes in and around the city. At the top of page 1 of your scoping document you actually say: "The project encompasses approximately 8,640 acres adjacent to the community of Lincoln." How do you determine that something 4 miles away from a community is adjacent to the community?	Although the town of Lincoln is 4 miles from the project area, there are subdivisions with private residences located adjacent to the forest boundary and identified in the Tri-County Community Wildfire Protection Plan (CWPP) (2005) as wildland urban interface. The Tri County CWPP identifies subdivisions as "Very High to High Risk" and stands close to the forest boundary are proposed for harvest treatments to reduce potential for crown fire spread into adjacent areas.		**Nonsignificant issue (3)**
3	Wording of the document	6. Stop using Meaningless Euphemisms to Describe your Project Goals. When you say you will treat the forest, you tell the public nothing! Other ambiguous, meaningless and deceptive terms used so often used by USFS line officers are: ● **Enhance** According to Webster, enhance is a verb meaning "to raise to a higher degree; intensify; magnify." ● **Mechanical treatment** Why is the USFS so frightened of using the word logging? Logging applies to all commercial extraction of trees . . . including "thinning." ● **Restoration** Once again, sugar-coated words. Webster defines restoration as "a return of something to a former, original, normal, or unimpaired condition." Clearly, USFS logging and road construction is the antithesis of restoration. ● **Rehabilitate** Once again, sugar-coated words.	Terms would be defined in a glossary as needed and 'plain' language would be used where appropriate.		**Nonsignificant issue (1)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
		Webster defines rehabilitate as "to restore to a condition of good health, ability to work, or the like." Clearly, USFS logging and road construction is the antithesis of rehabilitation. I strongly suggest that you purge your NEPA document of all words shown above in bold type and tell the public what you really intend to do!			
3	Wording of the document	7. How does one enhance a tree species? Enhance what? The USFS is so accustomed to using euphemistic words that are far removed from the issue at hand. What habitats do you want to enhance . . . the tree species habitat or the wildlife habitat that exists in aspen, western larch, and ponderosa pine? The meaning of the term enhance according to Webster is: "to raise to a higher degree; intensify; magnify." I suggest you read science attachment #1 again and tell me about how logging enhances anything other than a timber corporation's bottom line.	Enhancing a tree species would be taking actions to increase the presence of that species within the project area. Effects to tree species would be analyzed in the silviculture report and discussed in the vegetation section in Chapter 3 of the DEIS. See also response to letter 3, comment 1 pertaining to submitted literature.		**Nonsignificant issue (1,3)**
3	Purpose and Need	8. Your Proposed P&N Violates the CEQ Regulations for Implementing NEPA. You have identified 5 reasons for the Stonewall Deuce Fuels Reduction and Vegetation Management Project. You do not indicate which of the 5 is the driving issue for the sale. This means that 4 of your claimed reasons for proposing the project are not reasons for proposing the project, but claimed benefits of the project. Mixing up project benefits with the "underlying purpose and need" violates the CEQ regulations.	In summary, the 'underlying' purpose for this proposal is to: • have a desired mix of vegetation composition and structure across the landscape that is diverse, resilient, and sustainable to wildfire and insects (FP Goal 4 p. II/1; objective for WL and fish p. II/4); • that retains forest stands that allow fire as a natural process (FP Goals 4 & 14 pp. II/1-2) without risk of catastrophic events; • maintaining desired amounts of aspen, Western Larch, & PP (FP Goal 4 p. II/1) ; • while providing forest products including timber (FP Goals 11, 12 & 16 pp. II1-2); • and integrating with socioeconomic considerations (FP Goals 9, 1, 16 & 12 pp. II/1-2; Objective for visual and Roadless p.		**Nonsignificant issue (1)**

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			II/3). The purpose and need developed for the project was designed to address the difference between the existing conditions observed in the Stone Dry Watershed Analysis completed in 2009, and the desired conditions identified in the Forest Plan, while striving towards the goals and objectives identified in the Forest Plan (pp. II/1-6; III/5-7; III/30-52).		
3	The Migratory Bird Treaty Act of 1918	9. On January 10, 2001, President Clinton signed E.O. 13186, which described the responsibilities of federal agencies to protect migratory birds. One of the requirements of E.O. 13186 is that ``Each Federal agency taking actions that have, or are likely to have, a measurable negative effect on migratory bird populations is directed to develop and implement a Memorandum of Understanding with the Fish and Wildlife Service that shall promote the conservation of migratory bird populations." Clearly your proposal to underburn and pile brush (in which many species of wild birds nest) will result in a take of migratory birds in your project area. Without an MOU from the USFWL approving your destruction of nesting habit, you will clearly violate this law.	Consultation with the USFWS would be completed prior to a decision on this project. This project will follow the Memorandum of Understanding (MOU) with USFWS (FS Agreement # 08-MU-1113-2400-264). In particular the analysis and project design features would address item 3 from the MOU, noted here: "Within the NEPA process, evaluate the effects of agency actions on migratory birds, focusing first on species of management concern along with their priority habitats and key risk factors. To the extent practicable: a. Evaluate and balance long-term benefits of projects against any short- or long-term adverse effects when analyzing, disclosing, and mitigating the effects of actions. b. Pursue opportunities to restore or enhance the composition, structure, and juxtaposition of migratory bird habitats in the project area. c. Consider approaches, to the extent practicable, for identifying and minimizing take that is incidental to otherwise lawful activities, including such approaches as: 1. altering the season of activities to minimize disturbances during the breeding season; 2. retaining snags for nesting structures where snags are underrepresented; 3. retaining the integrity of breeding sites,	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed in the DEIS.	**Significant issue #1**

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			especially those with long histories of use and; 4. giving due consideration to key wintering areas, migration routes, and stopovers."		
3	Lodgepole Pine Treatments	10. Your Wishes to Eradicate Lodgepole Pine from your District are Unwarranted At the bottom of page 2 you lament the fact that the insect levels in your LPP are infecting the Ponderosa Pine. Why do you not understand that insect attacks on mature LPP (80+ years) is part of the natural cycle of this tree species. Given that LPP has serotinous cones, insect attacks and subsequent fire is the natural mechanism for LPP regeneration. Stands of LPP contain key habitat for a variety of birds and mammals. LPP is a native species in your area. No reasonable management scheme will ever keep insects from invading LPP. I strongly suggest that you stop interfering with Mother Nature motivated by greedy human needs.	Clarification of the proposed actions. The Forest Plan does not include direction to eradicate lodgepole pine. The Stonewall Vegetation Project scoping letter recognized that fire suppression-an unnatural undertaking-has led to a loss in open forest conditions containing ponderosa pine. The proposed action was designed to address the purpose and need to restore ponderosa pine habitats that have been lost and create conditions that allow for the establishment of fire as a natural process, and to develop a mix of vegetation composition and structure that is resilient to wildfire and insects.		**Nonsignificant issue (2,3)**
3	Wording in Document	11. Stop using Meaningless Euphemisms to Describe your Proposed Actions Same as letter 3, comment 6, but adds the word "activities"	Terms would be defined in a glossary as needed and 'plain' language would be used where appropriate. See response to letter 3, comment 6 regarding language.		**Nonsignificant issue (1)**
3	Road Construction	12. The USFS has gone to great lengths to convince the public that the construction of temporary roads and obliterating system roads is ecosystem-benign. Of course this is a lie. See below for the reasons that temp roads have more impacts to the aquatic resources than system roads: 1) The earth must be handled twice when constructing and obliterating temp roads. 2) Temp roads are "designed" by a logger on a cat with no knowledge of hydrology and the logger	Obliteration of National Forest System roads is not proposed. Effects of roads built then obliterated immediately following timber removal would be analyzed for all affected resources. Proper design features using best management practices would be applied minimizing soil displacement and sediment delivery concerns. See also response to letter 3, comment 1 regarding the literature considered.		**Nonsignificant issue (3)**

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		is under pressure to work quickly. 3) Most temp roads are outsloped, thus, the water on the road drains off the road at random places. 4) Temp roads have no surfacing to slow the water velocity. High water velocity picks up more sediment particles. 5) Temp roads have no ditch. Ditches adjacent to system roads control the water until the road designer calls for an appropriate outlet culvert location. 6) Sediment-laden water leaves the temp road at random locations . . . often in the streams. Please read "Temporary Roads are Like Low Fat Ice Cream" by George Wuerthner , 3-17-09. The link to this article is at: http://www.newwest.net/topic/article/temporary_roads_are_like_low_fat_ice_cream/C564/L564/			
3	Collaboration	13. Taking whatever actions the local collaborative group wants is not consistent with the requirement to "properly accommodate local participation." The USFS specialists have the natural resource knowledge and expertise. If the lay members of a local collaborative group propose that the USFS take action that is either illegal, harms the environment or does not maximize the protection of public health or safety, the USFS should educate the public. Best science must drive the programs, projects, and activities to protect public health and safety. If a local collaborative group proposes that the USFS take action that is contrary to best science, the USFS should say no. See: http://ceq.hss.doe.gov/nepa/regs/Executive_Order_13352.htm	During project development, the working group recommendations were reviewed by the Forest Service. The Forest Service modified the group's recommendations and developed additional treatments that we incorporated into the project proposed actions to meet the purpose and need identified for the Stonewall project while following Forest Plan direction. Chapter 1 of the DEIS would explain the process for development of this project proposal. Relevant literature has been considered in the analysis. See response to letter 3, comment 1 regarding the literature considered.		**Nonsignificant issue (3)**
4	Support for the Project	1. I support all aspects of the proposed action	Thank you for your support.		**Nonsignificant issue (4)**

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4	WUI	2. Maximize the salvage of infested LPP and fuel reduction treatments on acres located within the Wildland Urban Interface.	During development of the proposed action, we reviewed all stands for appropriate treatments, and while not all WUI acres are proposed for treatment, they were evaluated. Some were not included to ensure consistency with Forest Plan direction, or to minimize effects to resource areas while meeting Forest Plan direction. The purpose and need for this project includes:"Modify fire behavior to enhance community protection while creating conditions that allow the reestablishment of fire as a natural process on the landscape." and "Utilize economic value of trees with economic removal."		**Nonsignificant issue (3)**
4	Use HFRA to save time. Do not let timber deteriorate	3. Utilize the Healthy Forests Restoration Act to develop the NEP A on this project. This is supported by the Purpose and Need statement and the fact that much of the project is within the WUI. In salvaging high risk and infested LPP and thinning mixed and DF stands, there is very little difference in the on-the-ground treatments for "Restoration" or "Fuel Reduction" activity. 4. It is also very important that this proposal moves forward in a timely manner. The value of the timber that makes this project feasible is deteriorating and the longer the analysis takes, the less feasible it becomes. The HFRA requires analysis of the proposed action and the no alternative action. Not having to develop a range of alternatives will save valuable time.	The Healthy Forests Restoration Act (HFRA) process was considered for this analysis. The Forest Service is aware of the need to move this project along in a timely manner. We are evaluating product value and an economic analysis is provided in chapter 3 of the DEIS.		**Nonsignificant issue (1, 3)**
4	Collaboration	Utilize Stewardship Contracting as the primary method for accomplishing the identified projects.	Stewardship contracting may be considered during implementation; however, this analysis does not specify implementation methods.		**Nonsignificant issue (1)**
4	Request to be kept informed	Please keep me informed as the proposal is developed.	Commenter would be maintained on the project mailing list.		**Nonsignificant issue (1)**

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5	General Description of the Project	1. The Forest Service must complete a full environmental impact statement (EIS) for this Project because the scope of the Project will likely have a significant individual and cumulative impact on the environment. Following the list of necessary elements, Alliance has also included a general narrative discussion on possible impacts of the Project, with accompanying citations to the relevant scientific literature. These references should be disclosed and discussed in the EIS for the Project. See Letter # 5 for list	The analysis for this project is an EIS. See response to letter 3, comment 1 regarding the literature considered. The literature review completed for this project would be available in the project record.		**Nonsignificant issue (1)**
5	Weeds	2. Please provide an alternative that eliminates units that have noxious weeds present on roads within units from fire management proposals. Please address the ecological, social and ascetic impact of current noxious weed infestations within the project area. Include an analysis of the impact of the actions proposed by this project on the long and short term spread of current and new noxious weed infestations. What treatment methods would be used to address growing noxious weed problems? What noxious weeds are currently and historically found within the project area? Please include a map of current noxious weed infestations which includes knapweed, Saint Johnswort, cheat grass, bull thistle, Canada thistle, hawkweed, hound's-tongue, oxeye daisy and all other Category 1, Category 2 and Category 3 weeds classified as noxious in the MONTANA COUNTY NOXIOUS WEED LIST. 3. Are yellow and orange hawkweeds present within the project area? Please address the cumulative, direct and indirect effects of the proposed project on weed introduction, spread and persistence that includes how weed infestations have been and would be influenced by the following management actions: road construction including new permanent and temporary roads, and skid trails proposed within	The majority of the large prescribed fire units are in the roadless area where roads are lacking. An alternative that eliminated units with noxious weeds present on roads from fire management proposals was considered. Eliminating units with noxious weeds would eliminate fire management treatments in all units in the WUI accessed by existing roads. Not treating areas within the WUI would not enhance community protection. This alternative would not meet the purpose and need for the project of modifying fire behavior to enhance community protection while creating conditions that allow the reestablishment of fire as a natural process on the landscape. The no action alternative addresses eliminating units that have noxious weeds present on roads. Noxious weeds, including known occurrences and potential for spread would be analyzed in the noxious weed report and discussed in Chapter 3 of the DEIS. Preventive measures would be incorporated in the project design features including post treatment spraying of landings in year 1 after mechanical treatment, and monitoring at years 3 and 5, with retreatment if needed. The Forest has an active weed treatment program	Alternative considered but eliminated from detailed analysis, this would be discussed in Chapter 2 of the DEIS.	**Nonsignificant issue (3)**

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		this project; opening and decommissioning of roads represented on forest service maps; ground disturbance and traffic on forest service template roads, mining access routes, and private roads; removal of trees through commercial and pre-commercial logging and understory thinning; and prescribed burns. What open, gated, and decommissioned Forest Service roads within the project area proposed as haul routes have existent noxious weed populations and what methods would be used to assure that noxious weeds are not spread into the proposed action units? 4. What commitment to a long-term, consistent strategy of application is being proposed for each weed infested area within the proposed action area? What long term monitoring of weed populations is proposed? What native plant restoration activities would be implemented in areas disturbed by the actions proposed in this project? Will disturbed areas including road corridors, skid trails, and burn units be planted or reseeded with native plant species? 5. Which units within the project area currently have no noxious weed populations within their boundaries? What minimum standards are in the Helena National Forest Plan to address noxious weed infestations? Please include an alternative in the DEIS that includes land management standards that will prevent new weed infestations by addressing the causes of weed infestation. The failure to include preventive standards violates NFMA because the Forest Service is not ensuring the protection of soils and native plant communities. Additionally, the omission of an EIS alternative that includes preventive measures would violate NEPA because the Forest Service would fail to consider a reasonable alternative. 29. Please disclose how the productivity of the land been affected in the project area and	that will continue annual treatment of the known noxious weed infestations along roadways within the analysis area. Management requirements from the Forest Noxious Weed Treatment decision would be incorporated into any action alternative (USDA Forest Service 2006). Winter harvest, where used, could limit spread of weeds and reduce other impacts. See also response to letter 5, comment 6 for effects to rare or sensitive plant species. See the vegetation section in Chapter 3 of the DEIS regarding native forest species discussions.		

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		forestwide due to noxious weed infestations, and how that situation is expected to change in the coming years and decades.			
5	Rare Plants	6. What threatened, endangered, rare and sensitive plant species and habitat are located within the proposed project area? What standards would be used to protect threatened, rare, sensitive and culturally important plant species and their habitats from the management actions proposed in this project? Describe the potential direct and indirect effect of the proposed management actions on rare plants and their habitat. Will prescribed burning occur in the spring and early summer; please give justifications for this decision using current scientific studies as reference.	The botany Biological Evaluation (BE) will discuss the known information on rare and sensitive plant species habitat and analyze the effects to known sensitive plant species habitat within the project area. The botany BE would be incorporated by reference and summarized in Chapter 3 of the DEIS. If sensitive plant populations are located within the project area, appropriate mitigation (e.g., site avoidance) would be followed upon consultation with a Forest Service botanist. Prescribed burning effects would be analyzed and disclosed in the specialist's report and summarized in Chapter 3 of the DEIS. The majority of the burns would occur in the fall. We would avoid known locations of rare and sensitive plants if burns occur during spring and early summer.		**Nonsignificant issue (3)**
5	Whitebark Pine	7. What surveys have been conducted to determine presence and abundance of whitebark pine regeneration? If whitebark pine seedlings and saplings are present, what measures would be taken to protect them? Please include an alternative that excludes burning in the presence of whitebark pine regeneration (consider 'Daylighting' seedlings and saplings as an alternative restoration method). Will restoration efforts include planting whitebark pine? Will planted seedling be of rust-resistant stock? Is rust resistant stock available? Would enough seedlings be planted to replace whitebark pine lost to fire activities? Have white pine blister rust surveys been accomplished? What is the severity of white pine blister rust in proposed action areas?	Whitebark pine in the project area is located within the roadless area. Survey information would be discussed and planting would be evaluated in the Silviculture Report and discussed in the vegetation section of Chapter 3 of the DEIS. The project design features would include hand slashing around whitebark pine seed trees to protect existing seed sources. This practice has been used and found effective in the Alice Creek project area to maintain mature whitebark pine seed sources (J.Kurtz, personal communication). An alternative that excludes burning in the presence of whitebark pine regeneration was considered. This alternative was dropped from detailed analysis since the locations of all whitebark pine regeneration are not known, and may occur in small, isolated, scattered spots. Therefore, avoiding all whitebark pine regeneration areas would not be feasible. This alternative would not address the purpose and need element to Improve the mix of vegetation		**Nonsignificant issue (2,3)**

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			composition and structure across the landscape that is diverse, resilient, and sustainable to wildfire and insects. Health and resiliency of whitebark pine would be discussed in the Silviculture Report in the project record and briefed in Chapter 3 of the DEIS. The no action alternative also addresses no burning in the presence of whitebark pine regeneration.		
5	Safety Map Fuels and Fire Risk	8. Since the project's goals are to reduce the chances that fire will destroy private structures, and harm people, the current fuel/fire hazard situation on land of all ownerships within the WUI (at least the WUI that's relevant to this area) must be displayed on a map. More importantly, the fuel/fire hazard situation post-project on land of all ownerships within the WUI must also be displayed on a map. Based on this mapping of current and projected conditions, please accurately disclose the threats to private structures and people under those scenarios, for all alternatives. It must be discernable why some areas are included for treatment and others are not. 9. The FS must have a detailed long-term program for maintaining the allegedly safer conditions, including how areas would be treated in the future following proposed treatments, or how areas not needing treatment now would be treated as the need arises. The public at large and private landowners must know what the scale of the long-term efforts must be, including the amount of funding necessary, and the likelihood based on realistic funding scenarios for such a program to be adequately and timely funded. The FS must assess the fuel and fire risk situation across land ownership boundaries to understand, and disclose to the public, the likely fire scenarios across the area's landscape. Only then can the context of your proposal be adequately weighed on its merits and evaluated on its merits.	Historic fire information was considered. Potential effects to private land and structures would be considered in cumulative analysis for crown fire potential. Developing a detailed long-term program for maintaining the safer conditions, including how areas would be treated in the future following proposed treatments, or how areas not needing treatment now would be treated as the need arises is outside the scope of our analysis. The long-term program at the landscape scale is provided in the Forest Plan, SW crown, Blackfoot landscape assessment, CWPP or other broad-scale analyses. See also response to letter 3, comment 3 regarding analysis that would be included in the fire/fuels report and in Chapter 3 of the DEIS.		**Nonsignificant issue (1,3)**
5	Thinning	10. Please consider that thinning can result in	Slash from thinning may be more susceptible to		**Nonsignificant**

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	and Fire spread	faster fire spread than in the unthinned stand. Graham, et al., 1999a. 11. Since the scientific literature suggests that your thinning activities will actually increase the rate of fire spread, you need to reconcile such findings with the contradictory assumptions expressed in your scoping letter.	faster fire spread; however, this activity created fuels would be treated reducing this concern to levels of little risk. See response to letter 3, comment 3 regarding analysis of fire/fuels. Fuels discussion would be discussed in Chapter 3 of the DEIS regarding effects of the proposed actions, including treatment of activity created fuels. See response to Letter 3, comment 1 pertaining to literature review.		**issue (3)**
5	Old Growth associated wildlife species	12. The FS must disclose its transparent, well thought-out long-term strategy for old-growth associated wildlife species viability in a properly-defined cumulative effects analysis area.	Old growth management indicator species include pileated woodpecker, northern goshawk, and hairy woodpecker. Hairy woodpeckers are also a snag-associated species. Effects to old-growth associated species, including long-term habitat availability and anticipated effects to local viability would be analyzed in the wildlife report and biological assessment and discussed in the wildlife section of Chapter 3 of the DEIS. Both temporal and spatial analysis boundaries, would be clearly defined for each resource area in their methodology sections and cumulative effects would be disclosed in the specialist's reports and discussed in Chapter 3 of the DEIS.	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed in the DEIS.	**Significant issue #1**
5	Old Growth associated wildlife species Flammulated Owl	18. Please demonstrate that this project will leave enough snags to follow the Forest Plan requirements and the requirements of sensitive old growth species such as flammulated owls and goshawks. Loggers are required to follow OSHA safety standards. Will these standards require snags to be cut down? After snags are cut down for safety for OSHA requirements will there still be enough snags left for old growth sensitive species? Specifically how will the Stonewall Project affect Flammulated owls, cavity-nesters usually associated with mature stands of ponderosa pine and Douglas-fir? 19. What surveys has the HNF specifically designed to detect flammulated owls?	Snag retention and recruitment would be considered in the analysis and discussed in the wildlife report, biological assessment and biological evaluation and in the wildlife section of Chapter 3 in the DEIS. While snags that pose a safety risk would be removed as suggested, a number of project design features are in place to ensure that adequate snags (both size and amount) are retained to meet the needs of wildlife, including old growth dependent species. In addition, not all acres are being treated. All completed surveys and data collected are addressed in Chapter 3 of the DEIS. Coordinated flammulated owl surveys were conducted to protocol across various portions of the Forest in 2005, 2008, and 2009 as part of the Northern Region Landbird Monitoring Program.	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed in the DEIS.	**Significant issue #1**

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5	Cumulative Effects-Past Manageme nt Actions	13. Even though ecological restoration is not the project's priority, the NEPA document must at least identify all the existing ecological liabilities caused by past management actions. This includes poorly located or poorly maintained roads, high-risk fuel situations caused by earlier vegetation manipulation projects, wildlife security problems by open motorized roads and trails plus those that are closed but violated—and include all those impacts in the analyses.	Cumulative effects analyses considered effects from past present foreseeable future actions within and adjacent to the project area. Baseline/existing conditions discussed in Chapter 3 of the DEIS and in the Wildlife Report reflect the outcomes of past actions, including effects of roads on elk security. A listing of the known past, present, and foreseeable future projects that may contribute effects when considered with this project would be included in the DEIS. See response to letter 66, comments 15, 16 and 17 regarding snags.		**Nonsignificant issue (3)**
5	Roads in WUI	14. Any desire to keep a road in the project area WUI must be in harmony with the alleged priority goals (again, to reduce the chances that fire will destroy private structures and harm people), not driven by timber production goals. The analysis must show how all roads will in fact be in harmony with the priority goals.	This project does not include changing National Forest System roads. The Forest is currently analyzing two travel management planning processes; Blackfoot Winter Travel and Blackfoot Travel Plan (non-winter). Motorized vehicle use and route designations for the permanent Helena National Forest System roads would be addressed in this ongoing analysis and documented in the final decisions issued for the travel management plans. Travel management is outside the scope of this analysis but where appropriate would be addressed in cumulative effects.		**Nonsignificant issue (1)**
5	Fuels Reduction	15. Proposed activities could 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, [there is a] 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.	The project design features would include retaining adequate snags and down woody debris to meet Forest Plan direction. Effects to fuels and the related analysis would be discussed in the relative specialist's reports and summarized Chapter 3 of the DEIS. Proposed activities were designed to allow natural ecosystems to function while providing resource protection. The Tri County Community Wildfire Protection Plan defines WUI boundary as area within 4 miles from communities that possesses a population density exceeding 250 people per square mile.		**Nonsignificant issue (3)**

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5	Fire Policy	16. **Since disruption of fire cycles is identified, the HNF needs to take a hard look at its fire policies.** 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.	This is a programmatic Forest-level issue addressed by the annually updated Forest Plan Fire Management Plan. Forest fire policy is outside the scope of this analysis. The literature review includes a review of Ament (1997).		**Nonsignificant issue (1)**
5	Monitoring	17. 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 projects (implemented during the life of the Forest Plan) whose analysis area(s) encompass the areas to be “treated” 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	Existing monitoring information is being compiled and would be considered with the existing condition for various resources. Project related monitoring is identified and would be included in Chapter 2 of the DEIS. Ongoing forest-level monitoring would continue. The DEIS will include a list of the known past, present, and foreseeable future projects that may contribute effects when considered with this project. The direction in the Forestwide Noxious Weed EIS (USDA Forest Service 2006)would be incorporated Monitoring for weed treatments would be disclosed in Chapter 3 of the DEIS, and in the specialist’s weed report.		**Nonsignificant issue (3)**

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		results of the monitoring. 31. Please disclose the results monitoring of weed treatments on the HNF that have been projected to significantly reduce noxious weed populations over time, or prevent spread. This is an ongoing issue of land productivity.			
5	Viable populations	20. The FS should firmly establish that the species that exist, or historically are believed to have been present in the analysis area are still part of viable populations. Since Forest Plan monitoring efforts have failed in this regard, it must be a priority for project analyses. Identification of viable populations is something that must be done at a specific geographic scale. 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.	The wildlife report would include analysis of species most at risk including: threatened, endangered, sensitive, management indicator species, changes in related habitat distribution and use from the specific impacts from the proposed activities, and how the project area contributes to species viability when considered with other past, present and foreseeable actions. Overall, viable populations are evaluated at the Forest or Regional levels, and are outside the scope of this analysis.		**Nonsignificant issue (1, 3)**
5	Old-growth	21. Please disclose how stands to be treated 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.).	Effects to old growth would be analyzed in the specialist's reports and summarized in Chapter 3 of the DEIS.	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed in the DEIS.	**Significant issue #1**
5	ESA, TES, MIS	22. Please examine how this project could affect grizzly bears, lynx and other species listed under the Endangered Species Act. Are you complying with lynx critical habitat requirements? Please examine how this project will affect all MIS and sensitive species.	ESA compliance, including Section 7 consultation with the USFWS would be completed prior to the decision. Anticipated effects on federally listed species would be discussed in detail in the project Biological Assessment and summarized in Chapter 3 of the DEIS. The wildlife report will analyze effects to MIS and the Biological Evaluation will evaluate effects to	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed	**Significant issue #1**

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			sensitive species. These reports would be incorporated by reference and a summary of the analyses would be included in Chapter 3 of the DEIS.	in the DEIS.	
5	Roadless Area boundaries and Wilderness designation	24. Please utilize the NEPA process to clarify any roadless boundary issues 25. Please examine if these unroaded areas adjacent to roadless areas have wilderness qualities.	Inventory and evaluation of roadless areas takes place at the Forest Plan level. Unroaded areas adjacent to IRAs that overlap with proposed treatment areas will be evaluated for potential impacts to their roadless and wilderness characteristics.		**Nonsignificant issue (1)**
5	fisheries, water quality, soil, bull trout	23. We request the FS design a restoration/access management plan for project area streams that will achieve recovery goals. 26. 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. 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. This watershed has been proposed as bull trout critical habitat. Will you meet the requirements of bull trout critical habitat? 27. Please disclose in the NEPA document the results of up-to-date monitoring of fish habitat and watershed conditions and how this project will affect the fish in the project area. 28. It is extremely important the FS disclose the environmental baseline for watersheds. Therefore, proper disclosure of baseline conditions would mean estimates of stream stability, pool frequency conditions, and water temperature range—essentially the values of Riparian Management	c23: Designing a restoration/access management plan is beyond the scope of this analysis. See response to letter 5 comment 14 regarding travel management. c26, 27, 28, 30: An intricate part of this proposal is the caring for the transportation system needed to implement this project. Proper maintenance and mitigation would be applied. Effects on fish, water and soils would be analyzed, incorporated by reference and summarized in Chapter 3 in the DEIS. Past actions would be reviewed during the evaluation of the existing conditions and cumulative effects analyses. The proper measures and indicators would be evaluated that may be impacted from this proposal. The methodology and assumptions sections in the specialist's reports will evaluate and display what would be analyzed.		**Nonsignificant issue (1,3)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
		Objectives along with such parameters as sediment levels. 30. Please provide estimates of current detrimental disturbance in all previously established activity areas in the watersheds affected by the proposal. Please disclose the link between current and cumulative soil disturbance in project area watersheds to the current and cumulative impacts on water quantity and quality. Please disclose if there are any WQLS streams or TMDL streams in the project area. Please disclose measures of, or provide scientifically sound estimates of, detrimental soil disturbance or soil productivity losses (erosion, compaction, displacement, noxious weed spread) attributable to offroad vehicle use. 32. Please disclose how the proposed "treatments" would be consistent with Graham, et al., 1994 recommendations for fine and coarse woody debris, a necessary consideration for sustaining long-term soil productivity.	c32: Project design features would incorporate meeting Forest Plan standards for down woody material; Chapter 2 of the DEIS will list the design features developed for this project; Chapter 3 of the DEIS and the soils specialist's report will evaluate and display the effects to soil productivity.		
5	Climate Change	33. Published scientific reports indicate that climate change would be exacerbated by logging due to the loss of carbon storage. Additionally, published scientific reports indicate that climate change will lead to increased wildfire severity (including drier and warmer conditions that may render obsolete the proposed effects of the Project). The former indicates that the Stonewall Vegetation Project may have a significant adverse effect on the environment, and the latter undermines the central underlying purpose of the Project. Therefore, the Forest Service must candidly disclose, consider, and fully discuss the published scientific papers discussing climate change in these two contexts. At least the Forest Service should discuss the attached following	Anticipated climate change impacts would be discussed in the relevant specialist's reports with information to be summarized in Chapter 3 of the DEIS. See response to letter 3 comment 1 regarding the review of submitted literature.		**Nonsignificant issue (3)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
		studies: • Depro, Brooks M., Brian C. Murray, Ralph J. Alig, and Alyssa Shanks. 2008. Public land, timber harvests, and climate mitigation: quantifying carbon sequestration potential on U.S. public timberlands. Forest Ecology and Management 255: 1122-1134. • Harmon, Mark E. 2001. Carbon sequestration in forests: addressing the scale question. Journal of Forestry 99:4: 24-29. • Harmon, Mark E, William K. Ferrell, and Jerry F. Franklin. 1990. Effects of carbon storage of conversion of old-growth forest to young forests. Science 247: 4943: 699-702 • Harmon, Mark E, and Barbara Marks. 2002. Effects of silvicultural practices on carbon stores in Douglas-fir – western hemlock forests in the Pacific Northwest, USA: results from a simulation model. Canadian Journal of Forest Research 32: 863-877. • Homann, Peter S., Mark Harmon, Suzanne Remillard, and Erica A.H. Smithwick. 2005. What the soil reveals: potential total ecosystem C stores of the Pacific Northwest region, USA. Forest Ecology and Management 220: 270-283. • McKenzie, Donald, Ze'ev Gedalof, David L. Peterson, and Philip Mote. 2004. Climatic change, wildfire, and conservation. Conservation Biology 18:4: 890 -902.			
5	Costs and Benefits	34. Please evaluate all of the costs and benefits of this project. Please include a detailed list of all the costs to the agency and the public.	An incremental economic analysis would be completed and detailed listing of cost factors considered would be in the report. This analysis would be incorporated by reference and summarized in Chapter 3 of the DEIS. The specialist reports would be available upon request and filed in the project record. A summary of economic analysis, including financial efficiency		**Nonsignificant issue (3)**

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			would be included in Chapter 3 of the DEIS.		
5	Literature Review	35. It is our intention that you include in the record and review all of the literature and other incorporated documents we've cited herein. Please contact us if you have problems locating copies of any of them.	See response to letter 3 comment 1 regarding the review of submitted literature.		**Nonsignificant issue (3)**
6	Noxious Weeds	1. Noxious Weed management plan-per harvest or work activities and post management plan	See response to letter 5 comments 2,3,4,5 and 29 regarding noxious weeds.		**Nonsignificant issue (3)**
7	Noxious Weeds	1. Weed management when road is obliterated	See response to letter 5 comments 2,3,4,5 and 29 regarding noxious weeds.		**Nonsignificant issue (3)**
7	Noxious Weeds	2. Weed management where all the landings are	See response to letter 5 comments 2,3,4,5 and 29 regarding noxious weeds.		**Nonsignificant issue (3)**
8		1. I would like to be kept informed of any clubs, groups, and organizations etc. that oppose this project.	Table 1 under this section includes a listing of the individuals, clubs, groups, organizations and agencies that responded to scoping. This table lists the contents of the comments received.		**Nonsignificant issue (1)**
9	Timing of the Project	1. When would this start and is there a proposed completion date for the gulch area?	Implementation of the project would occur after the decision.		**Nonsignificant issue (1)**
9		2. The area on the east side of the Lincoln Gulch Road going north toward the cemetery is in dire need of "cleaning up" underbrush, deadfalls, and beetle killed trees. The area starts at the Forest Line (cattle guard) on Lincoln Gulch Roads and proceeds towards the cemetery.	The area noted is included in the proposed action (unit 12) for a regeneration harvest with fuels treatments following activities. The Lincoln Gulch Road is included in the Hazard Tree removal decision (August 23, 2010)		**Nonsignificant issue (3)**
11	Support for the project	1. …I support the effort the Forest Service is (?) to (?) and effectively improve the health and vitality of the forest	Thank you for your support		**Nonsignificant issue (4)**
14	Support for the Project	1. Overall I feel that the proposed action is sound and should be carried out	Thank you for your support.		**Nonsignificant issue (4)**
14	Wildlife, cavity nesters	2. The final plan should recognize that not all dead trees should be harvested. A sufficient number of "wildlife" trees should be left standing for cavity nesting species	Forest plan snag requirements would be met on treated areas and additional snag habitat would be provided throughout the project area in untreated areas. Snags would be discussed in the wildlife report and the wildlife section of Chapter 3 of the DEIS.	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and	**Significant issue #1**

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				anticipated effects would be discussed in the DEIS.	
14	Roadless	3. Post-treatment action should guarantee that motorized vehicle use does not increase in roadless areas	No harvest is identified in roadless areas. Stand density may be reduced through prescribed fire in the roadless areas. A project design feature would be included to obliterate the appearance of fire control lines adjacent to or that intersect existing trails, if warranted, to reduce the potential for unauthorized motorized use. The Forest is completing a travel management planning process for winter and non-winter travel. Motorized vehicle use would be addressed in this ongoing analysis. Unauthorized motorized vehicle use in roadless areas is a law enforcement issue and outside the scope of this analysis.		**Nonsignificant issue (1,3)**
15	Support for the Project	1. It is good to move forward with this	Thank you for your support.		**Nonsignificant issue (4)**
15	Treatments	2. The scale of the project should be enlarged (i.e., treat more acres)	Chapter 2 of the DEIS will include a discussions of the alternatives considered in detail and alternatives considered but eliminated from detailed analysis.	Alternative considered but eliminated from detailed analysis, this would be discussed in Chapter 2 of the DEIS.	**Nonsignificant issue (3)**
16	Streams and Watersheds	1. When the proposed action is implemented, special care needs to be taken to protect streams/watersheds.	Project design features and BMPs would be incorporated to provide protection of streams and watersheds.		**Nonsignificant issue (3)**
16	Support for the Project	2. Good job, well presented, hope it soon gets implemented	Thank you for your support.		**Nonsignificant issue (4)**
17	Support for the Project	1. We need more projects like this one	Thank you for your support.		**Nonsignificant issue (4)**
19	Support for the Project	1. Good job putting this together	Thank you for your support.		**Nonsignificant issue (4)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
21	Support for the Project	1. Just wish there wasn't so much red tape and it could start immediately	Thank you for your support.		**Nonsignificant issue (4)**
21	Jobs	2. Will there be jobs available?	Various portions of the project may be implemented through various methods (e.g., stewardship contract, timber sale, in-house staff). An analysis would be completed to address EO 12898 and the accompanying Presidential Memo regarding "Environmental Justice", which may include possible jobs on minorities, etc. This information would be discussed in Chapter 3.		**Nonsignificant issue (3)**
22	Support for the Project	1. We strongly support the proposed actions.	Thank you for your support.		**Nonsignificant issue (4)**
22	Prescribed fire	2. Our only concern is the use of fire. We are not opposed to that but we feel the use of fire is going to require a major educational effort before it is acceptable to many of the residents.	Information sharing regarding use of prescribed fire and development of burn plans is ongoing and would continue on the district.		**Nonsignificant issue (3)**
26	Motorized Recreation Opportunities	1. Adequate recreational opportunity for all visitors is the supreme issue that must be addressed by this action. 2. Clearly, the public wants and needs adequate recreational opportunity and this should be the over-arching theme of this evaluation and decision. 3. Reasonable alternatives to motorized closures must be pursued. The continual loss of motorized recreational opportunities is our primary concern. Because of the significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be "no net loss" of motorized recreational opportunities with the Stonewall Fuel Control Project. We would ask that this project address the attached checklist of issues and address the goals and needs identified. 4. We ask that management for sharing of these lands for multiple-use be selected as the preferred alternative. Sharing would include a 50/50 sharing and equal opportunity of non-motorized to	The Forest is completing two travel management planning processes, 'Blackfoot – North Divide Winter Travel Planning' and 'Blackfoot Travel Plan (non-winter)'. Motorized vehicle use and route designations for the permanent Forest System roads would be addressed in those ongoing analysis and documented in the final decisions issued for the travel management plans. Travel management is outside the scope of this analysis and does not address the purpose and need for this project.(Items 3, 4, 5 & 6). Effects of this project on recreation would be addressed in the Recreation Report and summarized in Chapter 3 of the DEIS. (items 1-2) Recreation resources would be addressed in the analysis and project design features would be included to minimize potential impacts to recreation within the project area (item 6). The attachment provides information pertaining to motorized vehicle use trends and discussion of allocations between motorized and non-motorized uses. This information is applicable to the travel	Alternative considered but eliminated from detailed analysis, this would be discussed in Chapter 2 of the DEIS.	**Nonsignificant issue (1,2,3)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
		motorized trails. 5. It seems that both the BLM and Forest Service are using forest planning and travel management planning as an opportunity to close as many motorized recreational opportunities as fast as possible. We are asking that this project establish a baseline evaluation and address this significant impact 6. …we strongly recommend and support the development of a Pro-Recreation Alternative. would include the following characteristics…: 1. Dispersed camping within 300 feet of all existing routes. 2. Use of seasonal closures, where required, to protect the environment and wildlife with the intention of keeping routes open for the summer recreation season. 3. All of the existing routes are needed as OHV routes due to the cumulative effects of all other closures. 4. Additional OHV routes are needed to address the growing popularity of OHV recreation and the greater needs of the public for access and motorized recreation… Attachment: "Information and Issues that Support a Pro Motorized Recreation Alternative" January 24, 2010. 7. Overall, we are extremely concerned about the unequal allocation of trail resources and we do not see anything that justifies the current imbalance with only 42% motorized trails. The facts presented in our comments clearly supports a motorized trail allocation of 50% or greater.	management planning process, but since no changes to the forest transportation system or its use, is proposed for this project, it is outside the scope of this analysis but similar concerns are being addressed in both of the Blackfoot Travel Plans.		
27	Motorized Recreation Opportunitie	1. Our first concern is that no existing motorized roads and trails should be closed as part of the proposed action.	See response to letter 26, comments 1 to 7.	Alternative considered but eliminated from detailed analysis,	**Nonsignificant issue (1)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
	s	2. Our second concern is that this area is ideal for motorized, multiple-use recreation. To adequately address this issue, we request that an alternative be considered that would provide new OHV routes in the area beyond those currently existing.		this would be discussed in Chapter 2 of the DEIS..	
28	Camping	1. I hope this includes some consideration for camping sites	A project design feature would be included to prioritize treatments adjacent to the Pine Grove campground and trailheads within the project area to avoid high use time periods and limit the time these areas may be closed to the public. Project design features would be included to coordinate project implementation and haul routes with recreation staff to minimize impacts to popular dispersed recreation areas and high use time periods (i.e.: fall hunting season), and to ensure that the public is aware of the scheduled projects. Effects of this project on recreation would be analyzed in the recreation report, incorporated by reference, and summarized in Chapter 3 of the DEIS.		**Nonsignificant issue (3)**
28	Support for the Project	2. I really appreciate and support your efforts	Thank you for your support.		**Nonsignificant issue (4)**
29	Support for the Project	1. We like the proposal. We are private landowners in Lincoln Springs Subdivision, and are interested in fuel reduction in the area.	Thank you for your support.		**Nonsignificant issue (4)**
31	Archaeological Resources	1. As an archaeologist I am strongly concerned about the possibility of the disturbance/destruction of archaeological resources while completing this project. From what I can discern from studying the map on the website at least part of the area in which the primary townsite of old Lincoln is situated will not have actions performed there. However that area is highly covered with thick brush and blow downs. In order to be able to properly document and preserve historic remains in this area these need to be removed; but with as little actual ground disturbance as possible. 3. In addition to the protection of the Old Lincoln	Effects to cultural resources would be analyzed and appropriate protection measure (e.g. avoidance) would be followed. The Forest archaeologist would visit known sites, including the Historic Lincoln Townsite, and identify appropriate project design features for inclusion in Chapter 2 of the DEIS. Project design features would include protection of existing and newly discovered heritage sites, along with appropriate monitoring and would be listed in Chapter 2 in the DEIS.		**Nonsignificant issue (3)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
		townsite those conducting this operation need to be aware of other undocumented historical remains throughout the entire project area; but especially around the old cemetery area and between Moon Lane and the Lincoln Springs Subdivision. A high chance of encountering cultural remains also exists on the west side of Lone Point before Moon Lane. 4. An archaeologist should regularly inspect work when the ground is disturbed in order to minimize destruction of resources.			
31	Support for the Project	2. Overall the project appears to be well planned and is extremely overdue.	Thank you for your support.		**Nonsignificant issue (4)**
32	Support for the Project	1. I appreciate the Lincoln District moving forward on any management proposal that includes timber harvest – dead or alive.	Thank you for your support.		**Nonsignificant issue (4)**
32	General Project Design	2. I would like to voice my concern that the NEPA process for this project seemed to go by the wayside. I saw no announced dates or comments about NEPA.	The notice of intent to prepare an environmental impact statement for the Stonewall Vegetation Project was published in the Federal Register on January 13, 2010. Scoping documents for this project were mailed to known interested and affected parties on January 15, 2010. The scoping documents were also available on the forest website. A press release was issued January 16, 2010 that announced a public meeting on February 3, 2010 and noted the deadline for comments was February 16, 2010. The Stonewall Vegetation Project has been listed on the Forest's schedule of proposed actions since April 2010. Public involvement efforts would be disclosed and discussed in Chapter 1 of the DEIS.		**Nonsignificant issue (3)**

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32	Multiple Use	3. Represent multiple use in an adequate solution for the project	The purpose and need for this project was developed to address fuels and restoration concerns and address the gap between the existing conditions and the desired conditions of the vegetation in the project area. Specialists for various resources reviewed the Forest Plan goals and objectives and developed actions to address the purpose and need for this project. Effects to the various resources would be disclosed in Chapter 3 in the DEIS.		**Nonsignificant issue (2,3)**
32	Roads	4. The roads established for the project should remain open for recreation, fire suppression, etc.	Changes to the permanent forest transportation system are not proposed with this project. See response to letter 5, comment 14.		**Nonsignificant issue (1,3)**
33	Ground Disturbance	1. Heavy equipment operations should be conducted at a time that minimizes ground disturbance – frozen and/or snow. 2. Seed disturbances (roads, skid roads, burn piles with a cheatgrass and noxious weed free NATIVE GRASS/FORB mix. No fertilizer (native plants won't need it)	Winter operations are an option, and may reduce impacts to soils and related resources. These concerns would be addressed in the Soils Specialist's Report and summarized in Chapter 3 of the DEIS. Seeding would be done with approved seed mixes as noted in the Forest Plan.		**Nonsignificant issue (3)**
33	Economics	3. All sales should be conducted with a "no net loss" to the taxpayer.	An incremental economic analysis would be completed and results disclosed in Chapter 3 of the DEIS.		**Nonsignificant issue (3)**
33	Prescribed Burning Support	4. Conduct as much control/prescribed burning as possible, no mimic natural processes.	Thank you for your support of prescribed burning.		**Nonsignificant issue (4)**
33	Motorized use	5. Consider how you are going to limit off-road and off-trail O.R.V. use once the forest is "opened up."	Effects of ORV use would be discussed in Chapter 3 of the DEIS and in the specialist's Recreation Report. The Forest is completing a travel management planning process for winter and non-winter travel. Motorized vehicle use would be addressed in those ongoing analysis. Unauthorized off-road motorized vehicle use is a law enforcement issue and an ongoing concern for the Forest.		**Nonsignificant issue (3)**

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34	Mountain Pine Beetle	1. It's too bad about the Mountain Pine Beetle. The Western larch is a beautiful tree. Its number should be increased.	Any regeneration activities planned would consider appropriate species mix, including western larch to move toward the desired conditions.		**Nonsignificant issue (2,3)**
34	Prescribed Burning Support	2. I like burning slash piles and prescribed burning.	Thank you for your support		**Nonsignificant issue (4)**
35	Mountain Pine Beetle	1. What are the time periods, how long to do these projects, could they continue as the beetle-kill continues on?	Project activities would be anticipated to be completed within a ten year time period. Other areas affected by beetle-kill would be analyzed separately.		**Nonsignificant issue (3)**
36	Roadless	1. You can't mine it, log it, farm it, ride on it, so yes, burn it.	Comment noted. Support for fire.		**Nonsignificant issue (4)**
37	Support for the Project	1. I support the actions proposed in the Stonewall Vegetation Project	Thank you for your support		**Nonsignificant issue (4)**
38	Motorized Recreation Opportunities	1. Our first concern is that no existing motorized roads and trails should be closed as part of the proposed action. 2. Our second concern is that this area is ideal for motorized, multiple-use recreation. To adequately address this issue, we request that an alternative be considered that would provide new OHV routes in the area beyond those currently existing.	See response to letter 26, comments 1 to 7.	Alternative considered but eliminated from detailed analysis, this would be discussed in Chapter 2 of the DEIS.	**Nonsignificant issue (1,3)**
39	Motorized Recreation Opportunities	1. Our first concern is that no existing motorized roads and trails should be closed as part of the proposed action. 2. Our second concern is that this area is ideal for motorized, multiple-use recreation. To adequately address this issue, we request that an alternative be considered that would provide new OHV routes in the area beyond those currently existing.	See response to letter 26, comments 1 to 7.	Alternative considered but eliminated from detailed analysis, this would be discussed in Chapter 2 of the DEIS.	**Nonsignificant issue (1,3)**
40	Motorized Recreation Opportunities	1. Our first concern is that no existing motorized road s and trails should be closed as part of the proposed action. 2. Our second concern is that this area is ideal for motorized, multiple-use recreation. To adequately address this issue, we request that an alternative	See response to letter 26, comments 1 to 7.	Alternative considered but eliminated from detailed analysis, this would be discussed in	**Nonsignificant issue (1,3)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
		be considered that would provide new OHV routes in the area beyond those currently existing.		Chapter 2 of the DEIS.	
41	Firewood	1. Would it be open for firewood?	Areas would be closed to firewood gathering during harvest implementation. Consistent with the forest plan, slash piles would be made available to the public prior to burning.		**Nonsignificant issue (3)**
43	Pine Beetle Restore diversified species	1. The proposed thinning and restoration makes perfect sense. Let us get the trees infested with the pine beetle out, to put in diversity only makes sense. Let's get in there, thin out the diseased trees, plan for some viable species, and help our forests to once again regain their beauty for all to enjoy.	Thank you for your support.		**Nonsignificant issue (4)**
45	Support for the Project	1. I agree with the proposal.	Thank you for your support		**Nonsignificant issue (4)**
45	Forest Health	2. As much wood as possible should be removed for the health of the forest.	Thank you for your support.		**Nonsignificant issue (4)**
47	Support for the Project	1. Project sounds like a good plan	Thank you for your support		**Nonsignificant issue (4)**
48	Forest Health	1. I am not opposed to vegetation management in the project area but I want it to be driven by good resource management and within the direction of the Helena National forest Land use Plan and not fire hysteria.	Thank you for your support.		**Nonsignificant issue (4)**
48	Visuals	2. A landscape analyses should be completed to show the changes that would occur from the proposed actions. 3. A feathering of Timber harvest along the existing straight line harvested areas would benefit the existing visual condition. Property lines adjoining private in holdings, state and BLM lands should be considered for this type of timber harvest also.	Design features would be incorporated to reduce the appearance of lines to meet the visual quality objectives for units adjoining private in holdings, state and BLM lands would be displayed in Chapter 2 in the DEIS. Effects to the visual resources would be disclosed in Chapter 3 in the DEIS.		**Nonsignificant issue (3)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
48	Cultural Resources	4. Lincoln Historical town site and cemetery: These two historical sites are eligible for nomination to the registrar of historical sites; this process should be completed to insure that adequate management, monitoring and protection occur. 5. Immediate restrictions should be implemented to closes these two area to personal fire wood gathering. 6. Other cultural resources that need protection are lower and upper stonewall ditches, and Lincoln ditch from Reservoir Lake to Lincoln Gulch. This project area is rich with early mining history and a cultural inventory is needed.	Project design features would be incorporated to provide appropriate protection for cultural resources. Heritage surveys and anticipated effects to cultural resources would be discussed in Chapter 3 in the DEIS.		**Nonsignificant issue (3)**
48	Grazing	7. An updated allotment plan would be need to reflect the changes to the grazing patterns associated with the proposed timber harvest.	Adaptive management practices may be incorporated as needed to address grazing patterns affected by the project, which may include measures such as herding or adjusting season of use. No changes to livestock grazing are proposed. The allotment management plan is outside the scope of this analysis.		**Nonsignificant issue (1,3)**
48	Prescribed Burning Roadless Areas	8. The roadless areas within the project area were created by the Rare 2 process identifying possible additions to the wilderness system. Management should reflect this quality. Prescribed fire in these areas should be under a natural prescribed fire plan and no mechanical fuel treatment done in these areas. On June 21, 2010 commenter J. Burns was contacted by J. Kurtz of the Forest Service, resulting in two points of clarification concerning “natural prescribed fire” and “no mechanical fuel treatment done in these areas”. Natural prescribed fire is in reference to the fact that J. Burns would like to see the roadless area within the Stone Dry project area be treated similar to the wilderness, turned into a FMU-3 so	Slashing is proposed in identified prescribed burn units to help achieve desired results (e.g. to help carry the fire across the unit) where adequate fuels may not currently exist on the ground. Hand slashing will also allow areas around individual mature whitebark pine trees to be cleared to encourage seedling establishment. Concentrations of whitebark pine regeneration may be protected through clearing of slash to reduce potential for fire caused mortality. The proposed hand slashing of small diameter trees within roadless areas will be evaluated for potential impacts to roadless and wilderness characteristics. See response to letter 5, comment 7 regarding alternatives considered.	Alternative considered but eliminated from detailed analysis, this would be discussed in Chapter 2 of the DEIS.	**Nonsignificant issue (2,3)**

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		the Forest Service can allow natural ignition to take place and managed for resource benefit. Mechanical fuel treatment is in reference to not only mechanized equipment but also hand slashing in road less areas. J. Burns referenced the hand slashing work being done in Alice Creek and does not like what he sees. Also J. Burns does not want to see hand slashing with chainsaw around whitebark for whitebark restoration "the beetles will kill all of them anyway"			
48	Thinning in past timber harvest areas	9. These areas are T-I lands to be managed for timber production. Pre commercial thinning was part of the silvicultural objectives for these areas, but was not done. With the timber maturity of these stands any thinning now should be commercial and the wood products removed used and not burned as slash. If no market exists the thinning should be postponed until a market for these types of products exist.	Meeting the stated purpose and need for the project, as well as stand characteristics such as tree species and size, may be used to determine whether the proposed treatments involve commercial thinning, pre-commercial thinning, or a combination of the two treatments. These assessments would be in the project record.		**Nonsignificant issue (3)**
48	Cumulative Effects	10. The effect of additional timber harvest that has occurred and will occur on state and private lands bordering this project area should be considered in this analyzes. The Lincoln ranger district is also proposing a hazard tree removal along system forest roads, if this project occurs would this timber harvest be in addition to what is proposed in this project?	Cumulative effects would be analyzed with the available information on past, present and reasonably foreseeable projects. The decision was signed on August 23, 2010 for the "Forest-wide Hazardous Tree Removal and Fuels Reduction- Healthy Forests Restoration Act Project." This project is in addition to this proposal and would be considered in the cumulative effects analyses.		**Nonsignificant issue (3)**
48	Recreation	11. A recreation activity that has increase in this area is personnel huckleberry picking how will the proposed actions effect huckleberry production, both for people and wildlife?	Recreation opportunities may be enhanced in the burn and harvest areas with a potential increase in huckleberry regeneration. The anticipated vegetative response to the proposed activities would be discussed under soft mast (e.g. berries) in the wildlife report. Short-term loss and long-term enhancement would be evaluated in detail in the wildlife specialist report and summarized in Chapter 3 in the DEIS.		**Nonsignificant issue (3)**

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48	Forest Health	12. Timber harvest will open new areas for snowmobiling. How will this be addressed in winter travel Plan? Past timber harvest areas have become unofficial play areas for snowmobiling this activity has caused some major damage to the leader growth of new plantations.	See response to letter 26, comments 1 to 7.		**Nonsignificant issue (3)**
48	Wildlife	13. Timing of all these activities would be very important not to interrupt and displace wildlife. If all this occurs at the same time there would be major displacement of wildlife. Critical season, calving, winter ranges, nesting, security during big game hunting, both archery and rifle must be considered.	Project design features would be incorporated to minimize impacts to elk calving and winter range, and ensure, that un-disturbed elk security and hiding cover is available. Project design features would be incorporated, as necessary, to restrict activities within breeding habitat for species with viability concerns (threatened, endangered and sensitive), as well as big game. Forest Plan compliance would be for these concerns would be evaluated. See response to letter 66, comments 6 and 7 regarding big game.	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed in the DEIS.	**Significant issue #1**
48	Economics Low timber market	14. The cost effectiveness of this of this proposed project should be analyzed. 15. With the local timber market very low, will additional timber products bring the market even lower?	See response to letter 5 comment 34 regarding economic analysis for this project.		**Nonsignificant issue (3)**
48	Economics Logging Systems and New Roads	16. Five miles of temporary road systems just cannot be justified. Helicopter logging would be cheaper.	See response to letter 5 comment 34 regarding economic analysis for this project.		**Nonsignificant issue (3)**
48	Economics	17. This project will need ongoing weed control, planting, thinning, monitoring, road maintenance, ECT. The president in his state of the union address said that federal spending would be frozen for three years. How will this affect the needed maintenances of this proposed action?	The President's comments regarding Federal budgets pertain to the overall Federal Budget. Individual forests prioritize implementation of site-specific projects that include the road work, weed control, etc as part of a potential purchaser's contract. The Helena National Forest Plan and management decisions would continue to guide ongoing weed control, planting, thinning, monitoring, road maintenance activities across the Forest. See also the response to letter 5 comment 34		**Nonsignificant issue (3)**

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			regarding economic analysis for this project.		
49	Haul Route Maintenance	If the roads in Lincoln SP Subdivision are used to facilitate equipment in and out of the area, will they be maintained after the job is finished? or during the process as needed	Haul routes are identified along state, county, or NFS roads. Forest Service use of roads not under FS jurisdiction would require an agreement before use. Road maintenance would be performed in accordance with the terms of these applicable agreements.		**Nonsignificant issue (2)**
53	Purpose and Need	1. We encourage you, therefore, to consider expanding the project purpose and need to include enhancement of watershed health, fish habitat and water quality.	The decision maker will review the purpose and need to determine if changes are warranted for this project. Project design features and BMPs would be incorporated and evaluated for effectiveness regarding potential effects to soils, water quality and fisheries. Results would be discussed in Chapter 3 in the DEIS.		**Nonsignificant issue (1,3)**
53	303(d) listed waters	2. It is important that all 303(d) listed waters within the project area be identified. It would appear that activities proposed with the Stonewall Vegetation Project have potential to affect sediment/siltation in the Blackfoot River watershed.	The watershed report will discuss potential effects to 303(d) listed waters as well as evaluate the effectiveness of project design features and BMPs designed to reduce potential effects to watershed resources.		**Nonsignificant issue (3)**
53	TMDL	3. We recommend that the Helena NF coordinate with MDEQ TMDL program staff to assure consistency of proposed Stonewall Vegetation management actions with TMDLs and Water Quality Plans prepared by MDEQ	The watershed report will analyze potential effects to water quality and would be summarized in Chapter 3 in the DEIS.		**Nonsignificant issue (3)**
53	Roads	4. The NOI states that the proposed action may include five miles of roads. We encourage minimization of new road construction as much as possible, particularly permanent new roads, and location of any needed new roads away from streams and riparian areas.	No new permanent roads are proposed. The new roads proposed in this project would be obliterated following timber harvest.		**Nonsignificant issue (3)**
53	Logging Systems	5. We also encourage use of timber harvest methods that minimize ground disturbance (e.g., skyline, helicopter, and logging during winter on snow or frozen ground)…	Units proposed for treatment would be evaluated for accessibility for removal method and discussed in the DEIS. Logging during winter on snow or frozen ground may occur. Effects to soils and watershed would be discussed in Chapter 3 in the DEIS.		**Nonsignificant issue (3)**
53	Restoration	6. …inclusion of watershed rehabilitation activities such as road obliteration, road BMP upgrades	Project design features would include applicable BMPs to reduce impacts to water quality. Effects to		**Nonsignificant**

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		road drainage improvements, revegetation, stream and bank stabilization, and other watershed restoration activities as much as possible.	watershed resources would be discussed in Chapter 3 in the DEIS with further detailed analysis available in the watershed and fisheries reports filed in the project record.		**issue (3)**
53	Vegetation Manageme nt	7. EPA generally favor understory thinning from below, slashing and prescribed fire treatments for managing vegetation to reduce fuels and fire intensity, as well as address forest insect, disease and other forest health issues, with retention of large, healthy, fire resistant trees, particularly retention of declining tree species (e.g., Ponderosa pine, whitebark pine, aspen), and retention of adequate snags and woody debris to maintain wildlife habitat and soil productivity.	Thank you for your support.		**Nonsignificant issue (4)**
53	Fuels Reduction in the WUI	8. We are supportive of efforts to reduce hazardous fuels and fire risks in Wildland Urban Interface (WUI) areas near homes and structures where there is high fire risk, and to reduce wildfire intensity.	Thank you for your support.		**Nonsignificant issue (4)**
53	Maps	9. A good watershed map showing streams, lakes, wetlands and other surface waters in the project area in relation to proposed actions should be included in the DEIS to allow clear understanding of water quality impacts.	The proposed action maps included watershed features. The project design features would include applicable BMPs to reduce impacts to water quality. Effects to watershed resources would be discussed in Chapter 3 of the DEIS.		**Nonsignificant issue (3)**
53	Adaptive Manageme nt	10. We particularly support the need for monitoring and evaluation and incorporation of principles of adaptive management in the alternatives, and highly support strategies that maintain and/or restore watershed condition and water quality to fully support beneficial uses.	Monitoring expectations would be discussed in Chapter 2 of the DEIS.		**Nonsignificant issue (3)**
53	Collaboratio n	11. If there are local groups focusing on watershed/ecosystem recovery, we encourage the Forest Service to consider including a watershed or ecosystem restoration alternative for detailed evaluation, or at least to include watershed/ecosystem restoration elements in the reasonable alternatives.	The Stone Dry watershed assessment was considered when developing the proposed action for the project. The purpose and need includes a restoration element. The proposed action addresses restoration of vegetative composition and structural diversity elements. Effects to vegetation and watershed resources would be analyzed in the silviculture and watershed specialist reports and would be		**Nonsignificant issue (3)**

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			summarized in Chapter 3 of the DEIS.		
53	Connected Actions	12. Also, if there are any proposed nearby actions or adjacent developments that are closely related to the proposed action it would be appropriate to analyze and discuss those related developments as a connected action (40 CFR 1508.25).	See response to letter 5 comment 13 regarding consideration of cumulative effects.		**Nonsignificant issue (3)**
53	Mitigation	13. Mitigation measures should be discussed in sufficient detail, rather than merely listed, in order to ensure that potential detrimental environmental effects and measures to mitigate those effects have been fairly evaluated.	The project design features would be discussed in Chapter 2 of the DEIS and the effects considered in the various resource discussions in Chapter 3 of the DEIS. Effectiveness of design and mitigation would be evaluated.		**Nonsignificant issue (3)**
53	Monitoring	14. Monitoring plans are also needed for measuring the effectiveness of the mitigation measures (quantitatively-if possible, and/or a qualitatively), and determining the need for modifying mitigation.	Monitoring would be discussed in Chapter 2 of the DEIS and anticipated results a discussed in Chapter 3.		**Nonsignificant issue (3)**
53	Cumulative Effects	15. NEPA requires that cumulative impacts be addressed as a summary of the individual impacts of this and all other past, present, and "reasonably foreseeable" future projects, including activities on private adjacent land irrespective of what agency/entity has decision-making authority or analysis responsibility.	See response to letter 5 comment 13 regarding consideration of cumulative effects.		**Nonsignificant issue (3)**
54	Fuels Reduction in the WUI	1. The trees above Lincoln Springs on Lone Point Road are also dead and need logging to prevent burning homes.	These would be included to the extent possible.		**Nonsignificant issue (3)**
55	Haul Route	1. I am all for this project; but wonder if we will see haul trucks in Lincoln Gulch using our roads. My concern would be dust, speed of trucks, and general concern for our kids.	Thank you for your support of the project. Project design features include safety signing of roads when trucks are hauling and dust abatement measures, as needed, for air quality and public safety.		**Nonsignificant issue (3)**

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57	Prescribed Burning Safety	1. Concerned about the close proximity to private property of at least one of the prescribed burn areas. Quite close to private residences.	A prescribed fire burn plan would be prepared for all burn units prior to burning and would identify the range of conditions appropriate for implementing the burn. Risk management is a foundation for all prescribed fire activities. Risk and uncertainties relating to prescribed fire activities are analyzed, communicated and managed as they relate to conducting or not conducting the activity. A complexity analysis is done for each prescribed fire plan. Identified risk are analyzed and then mitigated. If risks factors are identified with a “high” rating, they would be documented and discussed in the Complexity Rating Rationale of the fire plan. Prescribed fire prescriptions would be defined showing a range of conditions during which a prescribed fire may be ignited. The plan prescription will describe a range of low to high limits for the environmental parameters (weather, topography, fuels, fire behavior (flame length, rate of spread, spotting)) are required to meet the RX fire plan objectives while also meeting smoke and control objectives. Additional elements included in prescribed fire plans: (list is not all inclusive) contingency resources are identified, expected weather and fire behavior, ignition plan for the burn unit as well as a plan for holding the fire once ignited.		**Nonsignificant issue (3)**
58	Motorized Recreation Opportunities	1. Our first concern is that no existing motorized roads and trails should be closed as part of the proposed action. 2. Our second concern is that this area is ideal for motorized, multiple-use recreation. To adequately address this issue, we request that an alternative be considered that would provide new OHV routes in the area beyond those currently existing.	See response to letter 26, comments 1 to 7.		**Nonsignificant issue (1)**
59	Support for the project	1. The sooner this gets taken care of the safer the valley and town of Lincoln would be	Thank you for your support		**Nonsignificant issue (4)**

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62	Noxious Weeds	1. I would like to make sure that with the entire Stonewall Vegetation Project a weed control plan would be in place for the entire area after the project.	See response to letter 5 comments 2 through 5 and 29 regarding noxious weeds.		**Nonsignificant issue (3)**
63	Firewood	1. Firewood access?	The project design features include forest-wide standard for firewood (Forest Plan p. II/24).		**Nonsignificant issue (2)**
63	Recreation Facilities	2. Money left over to improve roads and trails and establish campgrounds	Allocation of' left over' funds to improve facilities is outside the scope of this analysis. Some of these suggestions are already incorporated into the design of this proposal e.g. road improvements for haul.		**Nonsignificant issue (1)**
64	Project Design	1. No trespassing on private property. Respect fences for livestock containment. No damage to, or repair if damaged	Project design features would include measures to protect existing livestock management fencing, or repair if damaged during operations.		**Nonsignificant issue (3)**
66	Forest Plan Amendment	1. It seems like extensive Forest Plan amendments would be required to implement the project, amendments that were not identified in the scoping notice.	The Forest Plan direction was considered when developing the proposed action. Design features would be incorporated to meet or move towards Forest Plan desired conditions. Upon review of updated information it was determined a site-specific forest plan amendment is needed to address noncompliance with elk habitat standards.		**Nonsignificant issue (2,3)**
66	Lynx Habitat	2. There is no discussion as to why this project will restore habitat for the lynx, so the purpose of the project is quite confusing. The agency needs to define what the current problem is with lynx habitat, and why logging and burning will improve and/or restore its value to the lynx. 27. This project will result in extensive destruction of lynx habitat, from burning to commercial harvest to pre commercial thinning. Please complete formal consultation with the USFWS. 28. The Forest Plan Amendment for lynx prohibits thinning of structurally diverse lynx habitat, as well as young plantations that provide hare habitat. Is the Forest Service planning on completing Forest Plan amendments to allow this project?	The proposed action includes a mix of treatments designed to: reduce the risk of wildfire, restore Forest System Land that has been affected by large-scale insect-caused mortality, and improve forest sustainability by increasing species diversity and promoting fire tolerant species/communities. Potential impacts to lynx would be identified and evaluated in the BA. All activities would be consistent with the 2007 Northern Rockies Lynx Management Direction (USDA Forest Service 2007), which ensures that the conservation and recovery of lynx in the Northern Rockies ecosystem is maintained, that all activities comply with applicable laws and policy and that standards and guidelines are in place that reduce impacts, while maintaining lynx habitat. Further, Section 7 consultation with the USFWS would be completed prior to any decision. Effects to lynx habitat would	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed in the DEIS.	**Significant issue #1**

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			be analyzed in the biological assessment and would be disclosed in Chapter 3 of the DEIS.		
66	Wildlife: Road Density and Forest Plan Direction specifically regarding Grizzly Bear Habitat. Elk is mentioned.	3. In particular, what are the goals for open and total road densities during project implementation, in order to avoid displacement of any bears using this habitat? 4. Please include a discussion in the draft NEPA document regarding how the Forest Plan direction for the grizzly bear, which originated in 1986, or over 20 years ago, has been evaluated as per effectiveness and relevance. It seems like some updating may be needed for management of this threatened species. 5. Please include a description of open road densities DURING project implementation, and define how this will affect habitat effectiveness levels of wildlife, from elk to the grizzly bear. 38. Please define what condition new roads will have to be in order not to count towards the total motorized access route density for grizzly bear habitat 6. Please map all current hiding cover and thermal cover for both the current and proposed levels, and define what percentage of the landscape these currently and will comprise in the future. 7. Please evaluate and map elk security cover as per the Hillis et al. (1991) criteria, which includes both cover and motorized routes, and discuss how this project will affect elk and deer vulnerability.	Potential effects to grizzly bear and other threatened, endangered and sensitive species were considered early during project design. Effects of roads on grizzly bears, including definitions of and an assessment of total and open road densities and effects to bears and their habitat, including whitebark pine, would be fully evaluated in the Biological Assessment and summarized in Chapter 3 of the DEIS. Open and total road density during implementation and post implementation would be analyzed. New roads would be obliterated immediately following timber harvest and all roads that are currently closed would remain closed to general traffic during project implementation. The amount and location of and effects to elk hiding, thermal and security cover would be analyzed and discussed under the wildlife section in Chapter 3 of the DEIS. Upon review of updated information it was determined a site-specific forest plan amendment is needed to address noncompliance with elk habitat standards. Roads are managed in a manner to maintain big game capability and hunting opportunity. Elk security per the Hillis et al. criteria would be analyzed and discussed under the wildlife section in Chapter 3 of the DEIS	Alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed in the DEIS.	**Significant issue 1**
66	Old Growth	8. Please provide an inventory for old growth habitat as per Green et al. (1992), and define how the Forest Plan direction would be met. 9. Please define how the old growth plan for this landscape will ensure viability of associated species, including the goshawk, pine marten, and various bird species of conservation concern as per the Montana Natural Heritage Program.	Old growth would be discussed in the vegetation and wildlife specialist reports and would be summarized in the respective sections in Chapter 3 of the DEIS. The silviculture and wildlife reports will clarify and describe how and what information would be used under their respective methodology sections.	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed	**Significant issue #1**

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				in the DEIS.	
66	Migratory Songbirds	10. Please define how this project will incorporate the Chiefs directive on conservation of migratory songbirds.	Effects to migratory birds would be analyzed in the wildlife specialist report and would be summarized in Chapter 3 of the DEIS.	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed in the DEIS.	**Significant issue #1**
66	Restoration: Fire and Wildlife	11. It is not clear why the agency has determined that fire has been excluded from this landscape, and that logging and burning will constitute "restoration." Please provide the current science that both supports and refutes this contention, as it is clearly a controversial assumption upon which the entire project is based. 12. Please refer to the recent publication by Baker, 2009, regarding fire ecology of the Northern Rocky Mountains, in your discussion on the restoration needs of your project. 18. What data did the working group use to determine that wildlife habitat problems exist that would be corrected with logging and burning? 19. It seems like the restoration efforts do not specifically address wildlife habitat. Why is this?	Support for the purpose and need, including that of restoration would be discussed and displayed in project specialist reports and other associated documents. The Fire Regime Condition Class (FRCC) analysis provides reference and desired conditions for vegetation in terms of fire return intervals and composition. The Forest Plan standards are the basis of wildlife desired habitat needs as compared to the habitat existing condition. Methodology and assumptions used in this analysis and used in the development of the proposal would be clarified in the wildlife methodology section in the specialist's report and would be summarized in Chapter 3 of the DEIS.		**Nonsignificant issue (3)**
66	Management Indicator Species	13. Please define the conservation strategies that would be implemented for Helena Forest management indicator species, including the goshawk, pine marten, and pileated and hairy woodpeckers.	Effects to these species, including conservation strategies and project design features would be discussed in detail in the Biological Evaluation (BE) (goshawk, pine marten, etc.) and would be summarized in the wildlife section of Chapter 3 in the DEIS.	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed in the DEIS.	**Significant issue #1**
66	Wildlife	14. Please define the level of wildlife inventories	The wildlife analysis process, including inventories		**Nonsignificant**

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	Surveys	that would be completed for this project, as well as their reliability in locating occupied breeding habitat for MIS, sensitive species, and species of special concern.	and monitoring would be discussed in the wildlife report, BA and BE, and summarized in the wildlife section of Chapter 3 of the DEIS.		**issue (3)**
66	Snag Management	15. Please define the specific snag management strategy for each treatment type, including post-logging snags immediately after logging, and how long-term recruitment of snags would be maintained 16. Please define what the management strategy would be for snags, whether it is the Helena Forest Plan or the Northern Region Snag Management Protocol. 17. Please define why snag habitat needs to be restored in this landscape, and how this would be accomplished.	Stand and landscape level changes to dead wood, including snag retention and recruitment of future snags and applicable snag management protocols would be discussed in the wildlife report and summarized in the wildlife section of Chapter 3 of the DEIS. Project design features would be incorporated to ensure activities are consistent with Forest Plan direction related to snags and downed woody debris.		**Nonsignificant issue (3)**
66	WUI	20. Please map the wildland-urban interface area, and include the occupied structures that lie within this. 33. Please discuss Jack Cohen's work regarding the use of small fuels buffers to protect structures, and how this science would be applied to the current project.	The Wildland Urban Interface was mapped during development of the Tri-County Community Wildfire Protection Plan (CWPP) and is in the project file. Structures are located on private lands, whose management is outside the scope of this project. There are subdivisions with private residences located adjacent to the forest boundary and identified in the “Tri-County Community Wildfire Protection Plan” (CWPP) as wildland urban interface. The stands in close proximity to the forest boundary are proposed harvest treatments. Subdivisions adjacent to the project are categorized as “Very High to High Risk” as identified in the Tri County CWPP. Treatments adjacent to private land are designed to remove dead material to reduce fuel loading on National Forest System lands. The fire/fuels analysis will include a map and discussion of wildland-urban interface. See response to letter 3 comment 3 regarding the fire/fuels analysis. The Forestwide Hazardous Tree Removal and Fuels Reduction Project is being implemented to		**Nonsignificant issue (1,3)**

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			remove dead trees that pose a hazard along Forest System Roads to provide safer access routes within the project area.		
			A literature review of Jack Cohen's work would be completed and considered during analysis for this project.		
66	Forest Health	21. What specific information is available to demonstrate that the current watershed conditions are "unhealthy?"	The Stone Dry watershed analysis (USDA Forest Service 2009) reviewed the existing conditions and the desired conditions identified in the Forest Plan.		**Nonsignificant issue (3)**
		22. Please define how forest health is being measured. What are the specific criteria used to define health, and what is the rating system used. Is a forest rated as either "healthy" or "unhealthy," or is there a sliding scale of health? Please identify the health level of each unit that is planned for treatment.	Existing condition of the vegetation and effects from proposed actions would be discussed in Chapters 1 and 3 of the DEIS. The silviculturist would analyze and discuss the anticipated effects of insect activity in relation to natural endemic levels of insect activity.		
66	Roadless Areas	23. There is no map of the inventoried roadless area boundaries. This should be clearly defined.	The proposed action map would be edited to depict the inventoried roadless boundaries.		**Nonsignificant issue (3)**
		24. If fire has to be restored to roadless lands, it must be demonstrated that fire has been eliminated. Please provide the current best science that demonstrates that the lack of fire in the roadless lands has resulted in a disturbed ecosystem, as define what particular portions of the ecosystem, including wildlife such as the lynx, have been harmed as a result.	Past fires and effects to fire/fuels and effects to wildlife would be discussed under silviculture, fuels, and wildlife section in Chapter 3 of the DEIS as well as additional detailed discussions in the respective specialist reports filed in the project record.		
66	Aspen	25. What are the indicator species that are going to be used to define the need for aspen treatments? If no wildlife species are going to be used to justify needs for treatment of aspen, what criteria are these treatments being based?	Effects to vegetation, including aspen management, and effects to wildlife, including management indicator species would be discussed in the respective specialist reports (silviculture, wildlife) and summarized in Chapter 3 of the DEIS.		**Nonsignificant issue (3)**
		26. Some current science has concluded that aspen are in a natural cycle of conifer encroachment from the last fire cycle, and that a decline in aspen is natural. What information in the project area is being used to suggest that aspen conditions are unnatural at this time, and that treatment is needed for restoration?			

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66	Timber Harvest and Past Harvest	29. Please identify all clearcuts, and what their size would be. 30. Please map and define the areas of past harvest.	A listing of silvicultural prescriptions and a map of areas of known past harvest recorded in the forest database would be developed and provided in the DEIS. The eight groups of treatments would be described in Chapter 2 of the DEIS. Exact locations of small clearcuts (under 40 acres in size) would be determined based on actual ground conditions (e.g., mortality present, topography) and will follow treatment prescriptions.		**Nonsignificant issue (3)**
66	Wildlife regarding bark beetle	31. Please discuss the significant values of bark beetle infestations and spruce budworm infestations to wildlife. 32. Please discuss the differences between habitat conditions for wildlife if the beetle-infested forests are left undisturbed, versus if they are clearcut, for both the short and long term.	Effects to wildlife species are discussed In Chapter 3 of the DEIS and further explored in the wildlife report and subsequent BE & BA. Untreated portions of the project area will provide undisturbed habitat for species associated with bark beetle-killed trees (e.g., hairy woodpeckers).	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed in the DEIS.	**Significant issue #1**
66	Roads	34.Please provide a complete inventory of ALL roads in the analysis area, from nonsystem roads, to system roads, to motorized trails, to proposed new temporary roads; include information on how these roads are individually identified (a number), the length of the road/trail in mileage, its current management, whether the road would be opened for the proposed project, whether any roads would be used for public firewood harvest, and the specific time when temporary roads would be closed after project completion. 35. Please define the long-term need for the temporary roads that would be constructed for this project. 36. Please identify what the difference would be between new temporary roads constructed for this project, versus old logging roads that are still in use or would be used for this project. Why won't new roads also be needed for future management?	The existing road information and roads needed for the proposal would be discussed in Chapters 1 and 3 in the DEIS. Existing routes would be used wherever possible to minimize additional impacts. New roads that would be obliterated following timber harvest were identified by forest specialists where needed to support the actions proposed with this project. The new roads that would be obliterated immediately following timber harvest are not anticipated to be needed for management actions after this project. No change to the permanent forest transportation system is proposed with this project. Effects from new roads that would be obliterated following timber harvest would be considered in the resource analyses in their individual reports and summarized Chapter 3 of the DEIS, including fragmentation impacts on wildlife species.		**Nonsignificant issue (3)**

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		37. Please address the fragmentation impacts of any new roads.			
67	Support for the Project	1. I believe this to be a great idea	Thank you for your support.		**Nonsignificant issue (4)**
67	Prescribed Burning Safety	2. I do have a concern about controlled burns…I would appreciate see more firefighters present at the time of burn as assurance of a containable situation should sudden winds or other agents cause spread in a dangerous way. 3. Ensure that all structures are insured to full replacement if anything should go wrong.	Burn plans would be prepared for each proposed unit and would be designed to be consistent with the Forest Plan. Insuring structures for full replacement is outside the scope of this analysis.		**Nonsignificant issue (1,2)**
68	Support for the Project	1. The LWG and FS have done a great job in addressing all of the issues and concerns. The EIS should be comprehensive and easily implemented as a result.	Thank you for your support		**Nonsignificant issue (4)**
68	Willow in Riparian	2. Willows were not indicated by name as seral species. If they are, and would be replanted where burned or in any [ripped or riparian] areas, may I suggest the use of a [stinger or auger?] mounted on the front of a backhoe. This would be quick, successful and inexpensive and allow planting of rootless willow slips up to 6-feet-long.	The effects of the proposed treatments on willow would be discussed in the silviculture and botany specialist reports. The project would follow Forest Plan guidelines for riparian protection. At this time, no treatments are proposed in riparian areas with willow, and no planting of “upland” willow is proposed.		**Nonsignificant issue (3)**
69	Prescribed Burning Safety	1. Ms Kamps, my name is Greg Brittain. I own the cabin and 40 acres just off Sucker Creek Road that is in sector 6 on your map. I am just below Doc Shields place. I am currently serving overseas and am unable to get to Lincoln until summer. Will precautions be taken to ensure that these burns do not spread beyond their intended areas? Thanks a lot!!	Mr. Brittain was contacted to clarify that precautions will take place to keep the prescribed fire where proposed. Additional information was provided and Mr. Brittain is on the mailing list to receive more project information.		**Nonsignificant issue (3)**
70	Prescribed Burning Safety	1. Could be dangerous to those living in the Lincoln Gulch area if there are not enough people at the prescribed burns with enough fire suppression equipment.	See response to letter 57, comment 1 pertaining to burn plans.		**Nonsignificant issue (3)**
70	Economics	2. I don’t see how you are going to get much from large commercial harvest sales. …open the sales to small loggers in 10-20-acre sales. Large companies can bid more than one sale. …this	An incremental economic analysis would be completed and would be discussed in Chapter 3 of the DEIS.		**Nonsignificant issue (1,3)**

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		would allow all local loggers to bid. Most of the timber slated for removal is not economically or commercially valuable, especially to big logging operators.	Designating contract type is outside the scope of this analysis and combinations of "Sale" packages would be evaluated if an action decision is made.		
71	Project Design	1. First, we respectfully request that the Stonewall Vegetation Project be designed and implemented consistent with the MFRC Principles as well as all existing environmental laws and regulations including the Roadless Area Conservation Rule. Second, we ask that this project be designed consistent with the requirements of the National Forest Management Act, the Forest Landscape Restoration Act and the Collaborative Forest Landscape Restoration Program (CFLRP) Field Guide to ensure maximum eligibility for forest restoration funding.	This project has been designed to comply with the Forest Plan, applicable laws, regulation and policy. Funding of implementation is outside the scope of the environmental analysis, but is considered in the economic analysis discussed in Chapter 3 and other laws and regulations sections of the DEIS.		**Nonsignificant issue (2,3)**
71	Project Design	2. For each stand that is proposed for treatment, either by USFS or LRC, please describe the agency's perspective on current stand condition, the stand's specific restoration need(s), how the proposed treatment meets these needs, the ecological basis for each treatment, the desired restoration outcome(s) and what monitoring measure(s) you will employ to determine whether and to what extent the restoration needs have been met.	Information for each proposed treatment unit has been collected. A series of formal stand exam plots has been established to be used in characterizing the current condition and would be used to estimate expected changes due to treatments using the Forest Vegetation Simulator, a forest modeling program.		**Nonsignificant issue (3)**
71	Monitoring	3. We would also like to see both implementation and effectiveness monitoring with a defensible statistical design including repeated sampling of plots or transects before and after treatment applications. This type of monitoring is laid out in the MFRC principles (principles 2 and 4).	Monitoring would be discussed in chapter 2 of the DEIS.		**Nonsignificant issue (3)**
71	Collaboration	4. We strongly encourage you to explore the possibility of a monitoring partnership between the Lincoln Ranger District and the University of Montana's College of Forestry and Conservation.	Partnerships for monitoring would be considered as opportunities arise for the forest. Developing these partnerships is outside the scope of this analysis.		**Nonsignificant issue (1)**
71	Restoration	5. To ensure maximum consistency with the Montana Forest Restoration Principles, please explain how each of the proposed silvicultural	The effects of silvicultural treatments and how they would be accomplishing the purpose and need for the project, which includes restoration objectives		**Nonsignificant issue (3)**

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		treatments qualify as "restoration" with respect to the MFRC principles	would be discussed in the silviculture specialist report and summarized in Chapter 3 of the DEIS. This discussion would include MFRC principles.		
71	Silviculture	6. Regarding the regeneration harvests of Project 1, it does not appear that these treatments are consistent with either the MFRC principles or the requirements of CFLRP. Please describe the specific goals of regeneration treatments described in Groups 3 and 4 and their relevance to the Montana Forest Restoration Principles. Assuming these treatments are designed to enhance stand replacement, please explain what the expected or desired species composition of the next stand would be, how this is consistent with the Montana Forest Restoration Principles and how the next stands would be managed.	The effects of regeneration treatments and how they would be accomplishing the purpose and need for the project, which includes restoration objectives would be discussed in the silviculture specialist report and would be summarized in chapter 3 of the DEIS. This discussion would include MFRC principles.		**Nonsignificant issue (3)**
71.	Silviculture Mountain Pine Beetle Adaptive Manageme nt	7. …we would like to know whether it is possible to leave large patches (1 to 5 acres) of uncut forests within the regeneration harvests. Through rigorous monitoring efforts, these patches could be used to monitor how stands regenerate following MPB mortality compared to regeneration harvests. While there is much area with MPB mortality in the surrounding areas, a robust design could be used as part of understanding species responses to treatments. We believe that this type of study is consistent with the 'adaptive management' principle adopted by MFRC and with language in the CFLRP Field Guide.	Effects to vegetation, including proposed reforestation planting, would be analyzed in the silviculture specialists report and summarized in Chapter 3 of the DEIS.		**Nonsignificant issue (3)**
71	Silviculture Reforestatio n	8. At sites where trees would be planted, what species of trees would be planted, at what density, and from what population or nursery will the seedlings originate? Please explain why the chosen mix of seedlings is used and how the chosen mix will facilitate meeting future stand conditions that fit our restoration principles.	Effects to vegetation, including proposed reforestation planting, would be analyzed in the silviculture specialists report and discussed in Chapter 3 of the DEIS.		**Nonsignificant issue (3)**
71	Roads	9. Please explain how, when and to what standard the temporary roads would be decommissioned and restored, and how this would be monitored.	See response to letter 3 comment 12 regarding new roads that would be obliterated immediately following timber harvest.		**Nonsignificant issue (3)**

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71	Noxious Weeds	10. Please explain how invasive plant species would be managed should they invade the temporary roads or treatment areas following implementation, and how invasive species would be monitored.	See response to letter 5 comments 2,3,4,5 and 29 regarding noxious weeds.		**Nonsignificant issue (3)**
71	Prescribed Burning Slashing	11. Please explain and clarify the use of "slashing" with prescribed burning activities, and explain what slashing prior to prescribed burning achieves.	In prescribed burn units, slashing (cutting of small diameter material and spreading it on the ground), is identified in areas to help achieve desired results where adequate fuels may not currently exist on the ground.		**Nonsignificant issue (3)**
71	Prescribed Burning Severity	12. Please use and reference appropriate fire models to analyze treatments, and then clearly state how treatments would change fire behavior across the Stonewall Vegetation Project area. Utilize a fire severity description for each habitat to be treated in these proposals that describe how the treatments will mimic the natural fire impacts for low, mixed and lethal fire regimes.	See response to letter 3 comment 3 regarding fire/fuels analysis.		**Nonsignificant issue (3)**
71	Prescribed Burning and Silviculture Fire Intensity	13. Identify stands or treatment areas that can be brought back into the naturally projected fire intensity levels either by using silvicultural treatments or prescribed fire.	The effects of stand treatments on proposed treatment units and how those effects relate to achieving the stated purpose and need, which includes "creating conditions that allow the reestablishment of fire as a natural process on the landscape" would be discussed in the silviculture and fuels specialists' and would be summarized in Chapter 3 of the DEIS.		**Nonsignificant issue (3)**
71	Prescribed Burning Mortality of large trees	14. Please outline the steps you will take to ensure that prescribed burning does not increase mortality of large trees in the project area. For example, if duff is thick and roots are shallow, even low severity fire can kill large trees and you might consider timing burning to ensure that only the top of the duff is burned, slash pull back or even raking the duff from away from the bole root collar.	Project design features identify measures to be taken to ensure conifer mortality is within an acceptable range. Individual trees may be protected by clearing brush and slash around the base of selected trees.		**Nonsignificant issue (3)**
71	Restoration	15. Given that many of the large trees are missing, take into account the need to restore the large Ponderosa pine population.	Part of purpose and need is to "enhance & restore aspen, western larch, and ponderosa pine species and habitats." The silviculture specialist report will discuss forest type and stand conditions and other		**Nonsignificant issue (3)**

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			project records will identify stands that have lost their large ponderosa pine component due to recent bark beetle mortality and how proposed treatments are anticipated to push the stands toward restoring that component.		
71	Prescribed Burning "Prescribed Mixed Severity Fire"	16. Regarding "Prescribed Mixed Severity Fire" we request the development of clear objectives for achieving a mixed severity fire. We would like you to describe what response you expect in terms of post-fire stand structure and landscape structure.	Treatment objectives would be discussed in the Silviculture and fuels specialist and summarized in Chapter 3 of the DEIS. The objectives of the mixed severity units are to create openings between 10-75 acres resulting in the breakup of continuous vegetation in higher elevations, promote age class diversity and enhance white bark pine habitat by creating openings suitable for regeneration.		**Nonsignificant issue (3)**
71	Stone Dry	17. …regarding the Stone Dry portion of the project as described in your recent scoping notice, we believe that the activities you envision for this area could be consistent with the Montana Forest Restoration Principles, especially Principles 5 and 6 which are included here for your reference: *5) Reestablish fire as a natural process on the landscape* *6) Consider social constraints and seek public support for reintroducing fire on the landscape*	Thank you for your support.		**Nonsignificant issue (4)**
72	Native Fish Habitat	1. …it is unclear if the project would adversely influence cutthroat trout (and bull trout) habitat; however, the project appears to have this potential given the scale and nature of the project. As the project moves forward, it would be important to ensure that special riparian protection measures are appropriate to protect riparian values associated with native fish habitat. This would include maintaining appropriate riparian buffers as part of the larger project, to offset potential effects from possible upland disturbance. There may also be opportunities to correct historical problems--related to streams--within the footprint of the project (e.g., replacing	Effects to fisheries would be discussed in the fisheries report and in Chapter 3 of the DEIS. Project design features would include INFISH direction to provide appropriate resource protection. INFISH direction would be met.		**Nonsignificant issue (3)**

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		undersized culverts). If so, perhaps this project could provide a mechanism to correct any such problem.			
73	Support for the Project	1. The Tri-County Fire Safe Working Group supports the Stonewall Vegetation Project because it will reduce the risk of a catastrophic wildfire in the Lincoln area.	Thank you for your support.		**Nonsignificant issue (4)**
74	Big Game	1. How will big game winter range be affected?	Effects to big game winter range would be analyzed in the wildlife report and summarized in Chapter 3 of the DEIS.	A potential alternative 3 was developed to reduce potential impacts to various wildlife habitat elements. This alternative and anticipated effects would be discussed in the DEIS.	**Significant issue #1**
74	Grazing	2. How will livestock grazing be managed?	There are no changes proposed to the existing livestock management. Effects to livestock grazing would be discussed in chapter 3 of the DEIS with more detailed discussion in the range specialist report.		**Nonsignificant issue (3)**
74	Harvest	3. How many green trees would be removed?	Effects to vegetation would be discussed in Chapter 3 of the DEIS. Providing an estimate of green trees to be removed is not anticipated to be specifically identified, particularly with the ongoing insect mortality.		**Nonsignificant issue (3)**
74	Economics	4. What will this cost the taxpayers?	The results of an incremental economic analysis would be disclosed in Chapter 3 of the DEIS.		**Nonsignificant issue (3)**
74	Noxious Weeds	5. Do you have a plan to deal with weeds?	Noxious weed treatments are ongoing across the Forest. Noxious weed treatments would continue with this project. Project design features would be incorporated to reduce potential for spread of noxious weeds.		**Nonsignificant issue (2,3)**
74	Visuals	6. What are the visual impacts?	Effects to visual resources would be analyzed and VQO forest plan compliance would be disclosed in chapter 3 of the DEIS.		**Nonsignificant issue (3)**

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74	Private lands	7. What are the private landowners doing to make their property more firesafe?	Management of private lands is beyond the scope of this project. However, any identified private land activities would be accounted for in cumulative effects analysis in the affected resource(s). Private landowners are working in cooperation with Federal and State agencies in managing lands to move toward the goals identified the Community Wildfire Protect ion Plan and the goals for the Southwest Crown of the Continent areas.		**Nonsignificant issue (1)**
75	General Project Design	1. I have nothing to add to the proposal. I agree with the practices being discussed to use on this project, as long as they are used wisely and not to the extreme-the most minimum effective way to get the job done, leaving as much authentic beauty around Lincoln. Heavy on conservation and restoration.	Thank you for your support.		**Nonsignificant issue (4)**
75	Timber Harvest	2. I'm worried about how much timber is cut out and where. The last time they cut around us it created a severe wind tunnel, blowing down dozens of my trees …	Proposed treatments would be discussed in Chapters 1 and 2 in the DEIS. Proposed action treatments were developed t following Forest Plan and regional guides to ensure treatments are appropriate for the stand types and conditions present. The project design features may include feathering along private lands to blend with the vegetation to avoid creating abrupt visual lines. Thinning of any kind would increase air movement through forest canopies. In units where trees are proposed to be “thinned” the increase wind movement would be relatively moderate due to the remaining tree canopies. The greatest increases would be in regeneration units, however even in the regeneration units trees would remain to provide shelter and seed, moderating winds. Also, regeneration units would be patchy, with patches of heavy mortality being regenerated and patches of healthy trees of a desirable species being retained and thinned as needed. Any modifications of treatments to prevent wind impacts on concerned landowners can be discussed, as long as the locations where the concerns are known. The effects of those medications on achieving the		**Nonsignificant issue (1, 3)**

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			purpose and need could then be discussed.		
75	Prescribed Burning Safety	3. The wind problem also concerns me in the burning process of this project; it is very gusty around us and unpredictable. How well will the burning be managed is a concern.	A prescribed fire burn plan would be prepared for all burn units prior to burning and would identify the range of conditions appropriate for implementing the burn. Risk management is a foundation for all prescribed fire activities. Risk and uncertainties relating to prescribed fire activities are analyzed, communicated and managed as they relate to conducting or not conducting the activity. A complexity analysis is done for each prescribed fire plan. Identified risk are analyzed and then mitigated. If risks factors are identified with a “high” rating, they would be documented and discussed in the Complexity Rating Rationale of the fire plan. Prescribed fire prescriptions would be defined showing a range of conditions during which a prescribed fire may be ignited. The plan prescription will describe a range of low to high limits for the environmental parameters (weather, topography, fuels, fire behavior (flame length, rate of spread, spotting)) are required to meet the prescribed fire plan objectives while also meeting smoke and control objectives. Additional elements included in prescribed fire plans: (list is not all inclusive) contingency resources are identified, expected weather and fire behavior, ignition plan for the burn unit as well as a plan for holding the fire once ignited.		**Nonsignificant issue (3)**
75	Prescribed Burning Air Quality	4. The extent of the burning, when and where and how long could cause heavy smoke creating breathing problems for the nearby residence.	See response to letter 1 comment 3 pertaining to air quality.		**Nonsignificant issue (3)**
75	Restoration	5. Conservation and restoration need to play a big part in this project. The steep hillsides need great consideration and the streams and springs. We rely on Stonewall Creek for irrigation and a spring for a source of water to the cabins. These sources would have to be protected from damage or	Project design features and applicable best management practices would be listed in the DEIS.		**Nonsignificant issue (3)**

Letter #	Topic	Comment	Response	Alternative	Issue # or category(ies)
		change.			
76	General Design of the Project	1. More details on what you are going to do	The proposed actions and alternatives, including project design features, would be discussed in chapters 1 and 2 of the DEIS. The applicable BMPs would be included in the DEIS,		**Nonsignificant issue (3)**
77	Identify the Project Area	1. Based on the maps provided in the scoping package, it is difficult to determine if this project lies near the CDNST or any of the project activities would be visible from the CDNST in the area. CDTA requests that the CDNST proximity to or location within the project area be identified.	The project vicinity map has been revised to include the CDNST for reference. There are no activities proposed from this project within a 5 mile radius of the CDNST (CDNST Plan 2009)		**Nonsignificant issue (1)**
77	Visuals	2. … activities should only take place within the CDNST corridor in a manner that is consistent with Trail values expressed in the CDNST Comprehensive Plan and when they are consistent with the Scenery Management System Objectives for the CDNST. Therefore, CDTA recommends the use of the Scenery Management System and the consultation of the CDNST Comprehensive Plan direction (2009) for assessing impacts of the Stonewall Vegetative Management Project on the CDNST.	There are no activities proposed from this project within a 5 mile radius of the CDNST. (CDNST Plan 2009) VQO compliance is addressed using VMS and summarized in chapter 3. A crosswalk between the VMS and SMS would be included in the visual resource report that would be available in the project record.		**Nonsignificant issue (3)**
77	Visuals	3. Specifically, CDT A requests that if the Trail lies within the project area, that careful attention be paid to the foreground zone (or Trail Corridor) and activities that may be seen from the Trail have the potential to negatively impact the Trail Users experience. We suggest the use of small group selections/thinning activities, and/or feathering of vegetation to soften the edges of any management activities that remove vegetation from the area. We would also like to discourage the any commercial harvesting activities within the CDNST corridor. For activities that occur beyond the Trail corridor, but are visible from the Trail. We request that careful attention be paid to minimize impacts to the visual aesthetic of the area. Again we suggest the use of feathering, small group selections/thinning, and careful use of fire in these	There are no activities proposed from this project within a 5 mile radius of the CDNST. Forest plan compliance would be determined using VMS per forest plan direction. VQO forest plan compliance of the project area from the CDNST would be addressed in the visual resource report and summarized in chapter 3 of the DEIS.		**Nonsignificant issue (3)**

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		areas to address management concerns.			
78	Timber Harvest	1. We believe the mature timber should be logged. Also, the beetle infested timber needs to be salvaged rather than left to waste and catch fire causing more problems.	Thank you for your support of the proposal.		**Nonsignificant issue (4)**
78	Roadless	2. We would like to see more roadless areas.	See response to letter 5 comments 24 and 25 regarding roadless.		**Nonsignificant issue (1)**
78	Roads	3. We support closing more roads on public land in an effort to control damage to both public and private deeded lands.	See response to letter 5 comment 14 regarding the ongoing travel management analysis.		**Nonsignificant issue (1)**
79	Prescribed Burning Air Quality	1. Air quality for the Lincoln community from prescribed burning.	See response to letter 1 comment 3 regarding air quality impacts.		**Nonsignificant issue (3)**
79	Loss of value from wood products	2. Loss of value from burning wood products. 3. Would request that no control burning take place. Chip only, lop and scatter limbs where equipment depressions are left and terraced for rain runoff and quicker nutrient base for remaining trees. Trees that are not sold should be stored on ranger district property for proposals to use for pellet startup company, firewood sales or siding production.	The no action alternative would include no controlled burning. The forest plan identifies prescribed burning as an appropriate tool for vegetation and fuels management (pages 11/33 – 34), and burn proposals would be completed following the Forest Plan Fire Management Plan direction in place at the time of implementation. Many of the proposed prescribed fire units are located in the Inventoried Roadless Areas (IRAs) where timber management is currently uneconomical or environmentally infeasible. Timber harvest is not proposed in the IRAs (management area M1). Forest Plan standard Firewood 2. Logging areas would be open to public firewood gathering after the sale is closed and prior to burning logging debris and closing roads, if wood is available and other resource values, such as wildlife snags, down logs, and soils, can be protected. An alternative was considered that would not use prescribed fire in management areas T1 through T5.	Alternative considered but eliminated from detailed analysis, this would be discussed in Chapter 2 of the DEIS.	**Nonsignificant issue (2),3**

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			This alternative would not address the purpose and need to modify fire behavior to enhance community protection while creating conditions that allow the reestablishment of fire as a natural process on the landscape. Due to not addressing this purpose and need this alternative was eliminated from detailed analysis. This would be disclosed in Chapter 2 of the DEIS.		
80	Support for the Project	1. Do what is needed	Thank you for your support		**Nonsignificant issue (4)**