Appendix B – Response to Public Comments

This appendix provides the substantive comments received on the Decline Thin proposed action in August 2007, along with the agency's response to those comments.

Background. The Mount Baker-Snoqualmie National Forest (MBS) circulated the Decline Thin Project Environmental Assessment (EA) for a 30-day public comment period from August 31, 2007 to October 1, 2007. The EA was mailed to 22 individuals and organizations that appeared on the list of potentially affected parties that includes local, state, and Federal entities, environmental organizations, as well as Tribal representatives. Post cards and an e-mail notice of the availability of the Decline Thin Project EA were mailed to over 70 addressees. Copies of the EA were made available at the Darrington Ranger District and the Mt. Baker-Snoqualmie National Forest Supervisor's Office in Mountlake Terrace, WA. The EA has been posted on the Forest's web site since August 31. A legal notice of the availability of the EA was published in the Seattle *Post Intelligencer* on August 31, 2007.

Eight comment letters or e-mails were received during the 30-day comment period. Comment letters and e-mails are available in the Project Record. The Responsible Official considered all substantive comments that were submitted (36 CFR 215.6(b)). Substantive comments are defined as: *"Comments that are within the scope of the proposed action, are specific to the proposed action, have a direct relationship to the proposed action, and include supporting reasons for the Responsible Official to consider" (36 CFR 215.2).*

This Appendix summarizes the more detailed Table B-2, Response to Comments, Decline Thin Project EA, contained in the Project Record. It provides all the substantive comments--summarized, paraphrased, or directly-quoted. After each comment is the agency response, often including a reference to analysis already contained in the EA.

Comment 1. Stewardship Contracting. *"Support the use of this tool to allow for greater restoration gains alongside the commercial benefits from wood extracted in thinning, but have concern about the lack of engagement up until this point from the agency with any kind of collaborative effort." Suggest "a one-time collaborative be formed from those who have submitted comments to date to discuss options."*

Response: See EA Appendix A, p. A-146. The District proposed and discussed the stewardship option on field trips and in the scoping letters of 2005 and 2007. There was interest from a number of responders in participation in a stewardship project, but not in the leadership role. The Forest has pursued collaborative efforts in not just a stewardship contract option, but in the design of the alternative elements, and in working with interested parties on the silvicultural prescription.

Comment 2. Prescription. *"Only Alternatives C and D allow for a variable density thinning approach to the stands to be thinned in the proposal, and therefore are the only ones that we consider for support."*

Response: See EA p 23 for elements common to all action alternatives The prescription for the 70-year-old stands for Alternatives B, C, and D is described as follows: "Thinning from below to a certain trees per acre with variable spacing is the general prescription in all units and alternatives".

Comment 3. 40 Year Stands. ***"We support entry into the younger 40-year old LSR stands for thinning, and support falling trees within the LSR where current road access is not available for removal."***

Response: Alternatives C and D provide for entry in to the younger stands of LSR, and will cut and fell trees where existing road access is not available. See EA pp. 53 to 55, and p. 62.

Comment 4. Roads. ***"The level of road construction and re-construction seems excessive in portions of the project, and should be carefully evaluated as to the objectives for entering a stand."***

Response: See EA pp. 61 to 64. All action alternatives propose haul and thinning from currently existing road systems with the addition of 4700 feet (less than1 mile) of temporary road. Road maintenance proposed with this project would lessen risk of road failure and allow limited road maintenance funds to be used elsewhere.

Comment 5. Roads. ***Concern with proposal in LSR to build nearly 3-miles of road for entry, as "too much disturbance to be outweighed by the benefits of thinning."***

Response: See EA pp. 61 to 64. All action alternatives propose haul and thinning from currently existing road systems with the addition of 4700 feet (less than 1 mile) of temporary road. Road maintenance proposed with this project would lessen risk of road failure and allow limited road maintenance funds to be used elsewhere.

Comment 6. Decommission and Culvert Replacement. ***In alternative D, there is 2.5 miles of road 2430 decommissioning and a culvert replacement. "Why was this action not considered under other alternatives?" Suggest this action to be a part of a final alternative selection.***

Response: Suggestion noted. The decommissioning of upper road 2430 was considered in Alternative D due to the proximity of the proposed thinning in Alternative D to the road segment proposed for decommissioning. This combination of activity could be accommodated with standard timber sale contracts and meets the requirement that Knutson-Vandenberg (KV) Act funds are applied to activities within the sale area, usually within ¼ mile of cutting units. Inclusion in one alternative and not in others allows evaluation of benefits and costs of the treatment.

Comment 7. Alternative C. ***There is mention of "outside funding" to deal with Road 2430016 and 2430017. 'What assurance is there of this work without a clear funding source?"***

Response: See EA p. 27; Alternative C description includes decommissioning Roads 2430016 and 2430017. See EA p. 62; KV funds are identified to be used. Use of KV funds would need to be within the limits of Knutson-Vandenberg Act's authority. Note that the 2430016 and 2430017 work is identified as part of the proposed action. It is not a "mitigation."

Comment 8. Wildlife. ***"Although the project is proposed through several alternatives to enter an LSR, the impacts to the spotted owl could be beneficial with restoration thinning done to create variability and improve future habitat."***

Response: The selected alternative supports the restoration of variability and improved spotted owl habitat. See EA pp. 90 to 95 for description of stand structure development for spotted owl.

Comment 9. Road density. ***"A concern for wildlife lies with the road density already in the area, and proposed for addition with all alternatives."***

Response: See EA p. 64 and pp. 98 to 102. All action alternatives would close roads following thinning activities with a reduction in open road density.

Comment 10. Grizzly Bear. ***"None of the alternatives proposed help to achieve the recovery plans goals of 55% core habitat, while the additional road mileage proposed for construction under Alternative D will actually temporarily remove core habitat."***

Response: See EA pp. 98 to 102; all action alternatives contribute to additional grizzly bear core area (more than 1/3 mile from open roads). The desired core habitat is difficult to meet in the Prairie Bear Management Unit (BMU) because that BMU includes large segments of State and private land that are likely to continue to be open and not contribute to core habitat.

Comment 11. Grizzly Bear. ***"It is unclear how a 2005 Sauk roadwork is used as short term mitigation for this proposal."***

Response: See EA p. 102. Road closures with the 2005 Sauk roadwork resulted in additions of 1,729 core acres in the Prairie Bear Management Unit (BMU). These new core acres created since 1997 can be used to off-set any temporary reduction in core habitat to meet the "no net loss" of core habitat policy from 1997. The trend since 1997 has been a continuing increase in core acres in the Prairie BMU.

Comment. 12. Alternative Selection. ***"It does not appear that any one alternative meets all of the goals that it should, but rather a combination of the features of these alternatives (with a strong consideration as to the impacts of the road construction) is best."***

Response: See EA pp. 6-7 for the rationale for the proposed action. See DN pp. 1 to 3 for the alternative selected and decision maker's rationale. It provides a description of how the selected alternative meets the original goals (purpose and need) of the project.

Comment 13. Healthy Forests. ***Support Decline Thin by allowing selective logging, keep forest healthy. Avoid unmanaged stands prone to fires, and managed forests for lumber vs. importing from Canada.***

Response: Comment noted. Some of these goals are met in Alternatives B, C, and D. See EA p. 3 for the purpose and need. See EA pp. 56 to 60 for fuels discussion.

Comment 14. Recreation and Access. ***Support improving roads for recreational use. Would like to see fuds from timber sales used to maintain trails and access roads.***

Response: See EA pp. 61 to 65 for access and travel management discussion, and pp. 123 to 125 for recreational use.

Comment 15. Stand Growth. ***Support thinning of forest stands to expedite stand growth.***

Response: Comment acknowledged. Alternatives B, C, and D provide for improving stand growth and conditions. See EA p. 3 for purpose and need.

Comment 16. Economics. ***What economic consideration had been given to utilization of slash in bundling and baling of material for biofuels or co-generation of energy versus piling and burning the material?***

Response: See EA pp. 130-132 for the economic analysis. Also see EA pp. 56 to 60 for fuels discussion. Because there has not been a market developed in the local area for the materials described, the option of bundling and baling slash would not be feasible and was not analyzed for this project.

Comment 17. LSR. ***"We appreciate that the preferred alternative does not enter LSR…. This LSR should be low priority for silvicultural treatment" (LSRA p. 82).***

Response: Comment acknowledged; see p. 1 of the EA where the proposed action does include thinning in the LSR area. See EA pp. 4 and 6 for rationale for LSR treatment. See EA pp. 40, 53 and 54 for LSR thinning treatment to meet stocking standards (LSRA, USFS 2001). See EA p. 93, where LSR treatment is consistent with the Forest–wide LSRA for wildlife, which refers to the Forest-wide LSRA, p. 82. "If treatments occurs, the western portion of the LSR (Decline, Dan, and Gravel Creeks) should be targeted first to increase the growth in early and mid-successional stands...."

Comment 18. Silvicultural Prescription. ***"We would like to see 70% canopy cover", with small gaps of < 1 acre, with clumping of large trees.***

Response. See EA pp. 24 and 25 for Alternative B description, with an upper diameter limit to provide for legacy trees. See pp. 27 to 30 for description of Alternatives C and D with retention of upper diameter limit and skips and gaps. The alternatives provide either 60% or 70% canopy closure.

Comment 19. Silvicultural Prescription. ***Retain diversity of trees; concern with red alder harvest along road. "All western red cedar, Pacific yew and other minor species should be retained".***

Response: See EA pp. 51 to 56, note Figures 18, 21, 22, and 23, which display species diversity within the stands following thinning treatments.

Comment 20. Riparian Reserve. ***We appreciate the no entry in the inner gorge, but would omit harvest due to concern with tree damage and soil erosion into stream channels. Any Riparian Reserve thinning should have trees left on ground to contribute to soil enhancement and instream wood.***

Response: Comment acknowledged. See EA pp. 4 and 6 for rationale for riparian reserve treatment. See EA p. 68 for description of intact riparian vegetation acting as a filter to soil erosion into streams.

Comment 21. Roads. ***Project is in a Tier 1 Key watershed, lending concern with meeting standards and guidelines of reducing existing road system. "The current preferred alternative does nothing to advance this goal" of reducing existing road system in Tier 1 Key watershed. Advocates avoiding construction of new roads and fully decommissioning 2.5 miles of Road 2430 and associated spur roads in Alternative D. Concern with amount of temporary road (0.9 mile) and potential for damaging a wetland in Unit 4.***

Response: See p. 63 of EA for Road Activity by Alternative. In all action alternatives, Road 2432 and portions of Road 2430 would go into storage after use. In Alternative D, 2.8 miles of road would be decommissioned, and a culvert-to-bridge upgrade would occur on Road 2430. See Management Requirement and Mitigation Measures (EA, Chapter 2) for Soil and Water. See pp. 33 to 40 for mitigations in regards to erosion, noxious weeds, wildlife disturbance, and sediment to streams. Temporary road locations were reviewed with the project hydrologist so as to avoid impacts to wetlands. See Hydrologist Specialist Report.

Comment 22. Mitigation, Monitoring, Enforcement. ***Concern that timing mitigations for noise be enforced and also applied to all units, at least Unit 9 should be included as well.***

Response: See EA p. 32, which describes rating for effectiveness of mitigations that are displayed on pp. 33 to 40. In response to this concern, Units 1 and 9 have been added to the list of units for noise mitigation measures. See Errata sheet, Appendix C of the Decision Notice.

Comment 23. Mitigation Enforcement. ***Concern that there is need for independent oversight of mitigation enforcement.***

Response: See EA mitigations that are displayed on pp. 33 to 40 with moderate to high effectiveness ratings.

Comment 24. Monitoring. ***Monitoring for effectiveness should be on-going, collected every 10 years.***

Response: Comment acknowledged. A series of ecosystem plots have been developed on the Forest and is part of the Forest long-term monitoring. Each year, the Forest produces an annual monitoring and evaluation report which summarizes results of ongoing monitoring during the previous fiscal year on a Forest-wide perspective and as required by the Forest Plan, as amended. Effectiveness monitoring is a part of a regional effort through the Pacific Northwest Research stations. See web site: http://www.fs.fed.us/pnw/about/programs/rmp/index.shtml.

Comment 25. Economics. ***Concern that sale would not be economically viable, providing a low incentive for purchasers.***

Response: Comment acknowledged. The sale would be economically viable under each action alternative. See DN p. 2 for explanation of rationale for decision. See EA pp. 130 to 133 for economic environmental effects.

Comment 26. Design. ***"The preferred alternative fails to conform to NWFP and should be modified as described above to do so."***

Response: See EA pp. 9 to 11 for relationship of proposed action to Forest Plan. Items of concern described above that are incorporated into Alternative D include the proposed decommissioning of 2.5 miles of Road 2430, and 0.4 mile of road with Roads 2430016 and 2430017. Roads will not be kept open during operations, in order to allow road utilization for landings and therefore minimize new road and landing construction. The addition of Units 1 and 9 for noise mitigations is also noted.

Comment 27. Economics. ***Concern for economics of sale with 40 and 70 year-old, due to stands with thinning from below and skyline logging.***

Response: See EA pp.130 to 131 for economic effects, and Appendix D of the EA pp. D-166 to 174 for stand diagnosis.

Comment 28. Alternative D. ***Supports this alternative, based on most acres treated, most volume, and action in support of project's stated goals.***

Response: Preference acknowledged.

Comment 29. Utilization. ***Supports the Decline Thin EA, thinning and salvage of dead and down. material. Forest is a renewable resource that properly managed, provides employment, recreation, and multiple use important to the community.***

Response: Support acknowledged.

Comment 30. Healthy Forests. ***Supports Decline Thin and projects that support healthy forests.***

Response: Preference acknowledged.

Comment: 31. Economics. ***Support for projects that bring dollars to the small rural communities.***

Response: Support acknowledged.

Comment 32. Roads. ***We acknowledge that 0.9 mile of temporary road is on the low end of roads per-acres-thinned, but still don't like it." There is "no map of the temporary roads and it is not clear why it would be necessary or what units it would be used to access.***

Response: Additional clarification on temporary roads: see EA pp. 61-63; the temporary roads would be in matrix in Units 1-9. See Appendix C, Figure C-1, for a new map of temporary roads and landings. The estimated total of 4,700 feet of temporary road would be comprised of 5 short routes located in Unit 2 (750 feet), Unit 4 (1700 feet), Unit 7 (400 feet), and Unit 9 (2 spurs totaling 1400 feet). Estimates of temporary road distances also include 50 feet off the main road into Units 1, 3, and 8. The existing roads within the sale area will not be kept open to the public during operations so as to allow full utilization of the existing road system for landing sites.

Comment 33. Landings. ***"We are concerned about the construction of landings. We do no think you have discussed them adequately in the EA. How many new landings would be created, as an estimate? How much acreage of compacted soil would this constitute? Every effort should be made to locate landings on existing road prisms or pre-existing landings."***

Response: Additional information on landings: see Appendix C, Figure C-1, for a new map of temporary roads and potential landings. Landings are typically located along roads within the road prism and utilizing previous landing sites where possible. This will limit the soil compaction to within levels prescribed by Forest Plan Standards and Guidelines. See EA, p. 14. Pre-existing landings or roads are not present in all units in this project area because ground based logging systems that did not require landings were used in the past, instead of cable logging systems. See EA pp. 66-76; soil compaction for the alternatives is compared, and all action alternatives have low levels of soil impacts and all meet the Forest Plan standards. Also see Errata for more description of Figure C-1.

Comment 34. 2.5 mile Decommissioning of Road 2430. ***Support Road 2430 decommissioning, but have concern that the road is on its way to self-decommissioning. "Are there deep culverts and unstable sidecast? Is it a significant aquatic risk?" What work is needed to carry out the decommissioning? Is there money to carry out the work? Could K-V funds be used for this purpose?***

Response: Culverts: See EA p. 62 for description of culvert removal (7 culverts), and 530 feet of sidecast material removal in the upper Road 2430. This work was identified in field trips in 2007 with the Forest Hydrologist to determine aquatic risk and work remaining before considering the road fully decommissioned. Funding: KV funding depends on the sale area map and timber sale bids. The latter is not predictable. The requirement of the Knutson-Vandenberg Act is that funds are applied to projects within the sale area, usually within ¼ mile of cutting units. Timber sale contract maps show the final sale area, but are usually not drafted until after the NEPA project decision and appeal process, based on topography, access, economic, and other site-specific considerations. At this point, it appears possible that some Road 2430 decommissioning work will be covered by KV funds.

Comment 35. Daylighting. ***What is "daylighting"? Concern for 50 feet from centerline creating an open swath of 100 feet. "Does this include cutting of merchantable timber?"***

Response: See EA p. 50, Effects Common to All Alternatives, where daylighting is defined as removal of overhanging trees to minimize branch and leaf debris that would block drainage in road ditches and culverts. "The road surface would receive more sunlight, and the result would be an increase in public safety on the road system." Work is expected to be within 25 feet of the road edge with alders targeted for removal where the tree tops have grown out over the road. Removal would be intermittent along the road, and would occur only where trees are considered a potential impact to drainage. Merchantable and unmerchantable timber would both be included.

Comment 36. LSR. ***Concern with the economics of Alternative D as portrayed in Table 16, and the justification for yarding felled material in LSRs. Concern that meeting target volume is not LSR management objective.***

Response: See p. 1 of the DN for economic considerations for the selected alternative. See p. 132 of the EA, Table 16. Alternative D benefit:cost ratios were lower than the other alternatives due to the additional road decommissioning costs and the culvert-to-bridge conversion costs as well as the thinning costs in the 40 year-old stand. All alternatives are consistent with the Forest Plan, as amended, and comply with law, regulation, and policy (EA pp. 15-17, and 133-142).

Comment 37. LSR Prescription. "*We do not have, in principle, any firm objection to felling and leaving in 40-year-old stands within LSR, although we are not convinced of its necessity and suspect it has the strong potential to homogenize the stand if done wrong." Intervention in LSRs should be done to meet heterogeneity, and less of an intervention would be cheaper.*

Response: See EA pp. 4 and 6 for rationale for the LSR treatment. See EA pp. 40, 53, and 54 for LSR thinning treatment to meet stocking standards (LSRA, USFS 2001). See EA pp. 51 to 56, noting Figures 18, 21, 22, and 23, which illustrate species diversity within the stands following thinning treatments. See EA pp. 130 to 131 for economic effects, and Appendix D of the EA, pp. 166 to 174, for stand diagnosis.

Comment 38. Aquatic Considerations. "*We do not like commercial thinning in riparian reserves; do not believe it is under any circumstances beneficial. What is the justification for these 10 acres? Where are the 10 acres of riparian thinning?"*

Response: See EA pp. 4 and 6 for rationale for riparian reserve treatment. See EA p. 68 for description of retention of intact riparian vegetation in the inner gorge of riparian areas. The 10 acres of matrix thinned riparian reserve are dispersed along the outer edges of Units 1 to 9. See Appendix C of the DN for a map showing the treatment areas within riparian buffer areas.

Comment 39. Silvicultural Prescription. ***We certainly like the 70% overall canopy cover of Alternatives C and D better than 60% in B, but we think that reducing or eliminating temporary road construction is a higher priority for improvement of this proposal.***

Response: Preference in priority acknowledged. See DN pp. 1 to 3 for the description of the selected alternative and its rationale. The three action alternatives meet the purpose and need for forest stand management actions, while also providing commercial wood fiber consistent with the MBS Forest Plan, as amended. Inclusion of 60% canopy cover in one alternative and 70% in other alternatives allows comparisons of benefits and costs of the treatment. As acknowledged in previous comments, the 0.9 mile of temporary road is on the low end of roads per-acres-thinned. Road elements were identified by the ID team as units of measure for watershed processes (see EA p. 9), and alternatives were developed to minimize the construction of new roads, and to maximize treatment opportunities for aquatic high-risk roads. An alternative with fewer matrix acres thinned (resulting in reduced road access needs) was not an alternative developed in detail because it would not substantially meet the purpose and need of decreased stocking in dense stands to maintain the health and vigor of the residual forest stands.

Comment 40. Gaps. ***Gaps should be more than roads and landings. Create gaps that can function more like natural mortality patches; leave woody material for woody biomass and a few standing trees in each gap.***

Response: Skips and gaps cover more than just roads and landings. See EA pp. 24 to 30 for description of Alternative B, C, and D, with discussion of canopy retention and skips and gaps. In the 70-year old stands in Alternative C and D, approximately 10 percent of the area would remain as skips, and 10 percent of the area would remain as gaps. In the 40-year old stands in Alternative C and D, 10-20 percent would remain as skips, and 10-20 percent would remain as gaps. See EA pp. 52 to 56 for environmental effects on vegetation from skips and gaps. The wildlife environmental consequences (EA pp. 90-122) take into account the indirect effects of these vegetation skips and gaps on wildlife and wildlife habitat.

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