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Northern Region
Idaho Panhandle National Forests

Whitebark Pine Restoration

Decision Notice and Finding of No Significant Impact



Selkirk Mountains
Bonners Ferry Ranger District

July 2004

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Decision Notice
and
Finding of No Significant Impact

Whitebark Pine Restoration
Environmental Assessment

Bonners Ferry Ranger District
Idaho Panhandle National Forests
USDA Forest Service
Boundary County, Idaho

1. Introduction

The Bonners Ferry Ranger District has completed an Environmental Assessment (EA) examining alternatives for ecosystem management in the Whitebark Pine assessment area. The area is located approximately 13 air miles northwest of Bonners Ferry, Idaho, in the eastern portion of the Selkirk Mountains. It encompasses about 135,000 acres, of which approximately 126,000 acres are National Forest lands on the Bonners Ferry Ranger District, and 9,000 acres are private land (Figure 1). Ten watersheds are included in the assessment area – Smith, Long Canyon, Parker, Farnham, Fisher, Trout, Ball, Burton, Cascade, and Myrtle creeks.

2. My Decision

This Decision Notice documents my decision to select Alternative 4 as described in this Decision Notice and the Whitebark Pine Restoration Environmental Assessment (EA pp. 2-22 through 2-29) issued in May 2004. The selected alternative includes approximately 1,730 acres of whitebark pine restoration treatments to be accomplished through non-commercial vegetation treatments, and prescribed fire. The restoration activities are designed to:

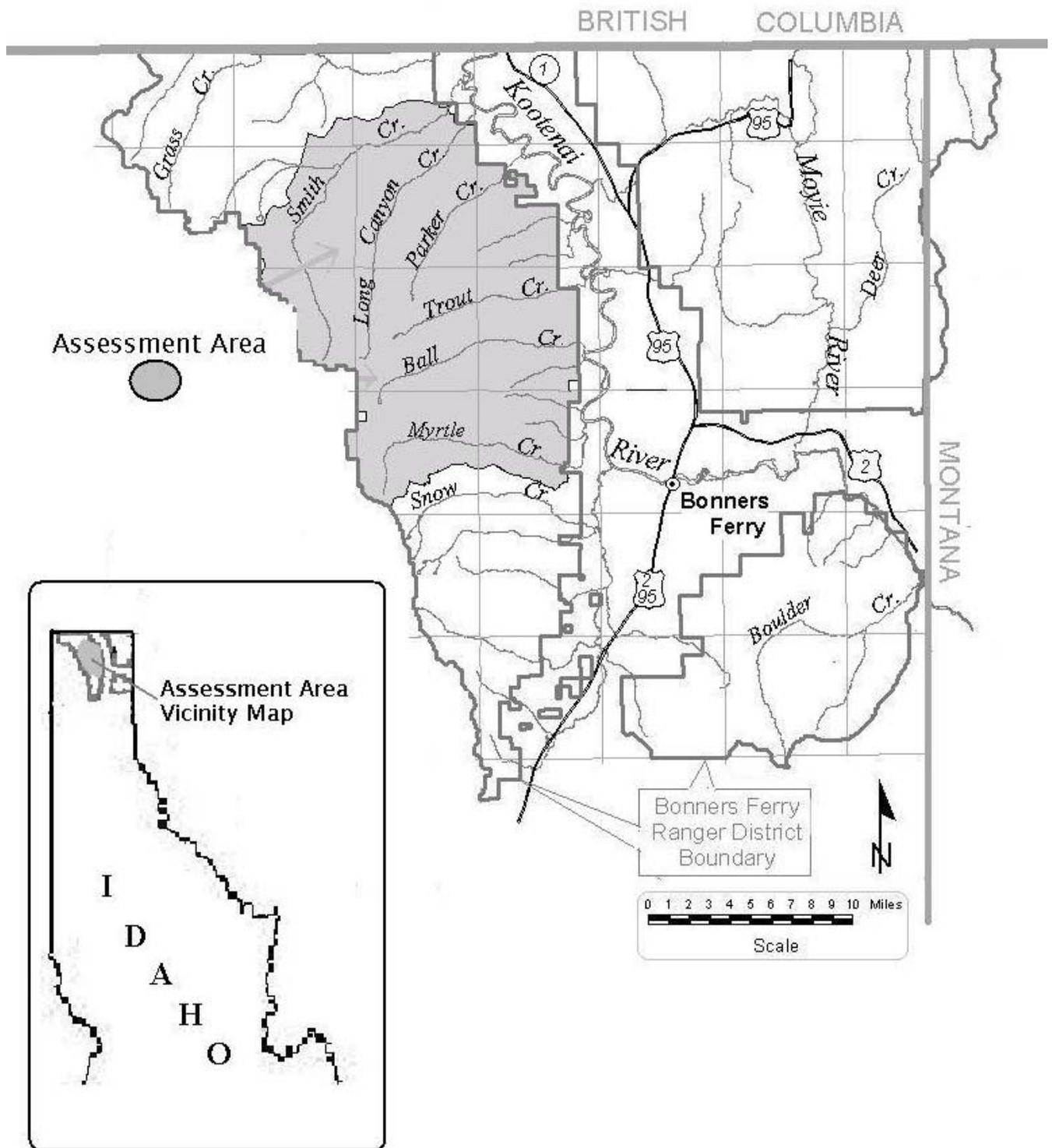
- 1) Restore forest health and maintain whitebark pine in the ecosystem through manipulation of the composition and structure of designated stands (EA, p. 1-1);
- 2) Reintroduce the role of fire in the ecosystem (EA, p. 1-3); and
- 3) Provide for wildlife habitat diversity (EA, p. 1-4).

Table 1. Treatment Summary - Selected Alternative

Treatment Type		Treatment Pattern	Acres
Slash and Prescribed Burn	2- to 5-acre groups	Irregular	1045
Potential Secondary Burn Area		-----	297
Whitebark Pine Release	2- to 5-acre groups	Irregular	324
Whitebark Pine Release	Continuous	Continuous	64
Maximum Treatment Area			1,730

Acres are approximations based on field visits, GIS data, timber stand data, aerial photos and other sources of data.

Figure 1. Assessment Area Vicinity Map



Features of Alternative 4

Alternative 4 was developed as a further refinement of Alternative 3 with additional emphasis on public concerns involving activities within Management Area 11 proposed wilderness lands. This alternative does not include the proposed burn-only treatments within Long Canyon. It reduced the total treatment from about 2062 acres to about 1730 acres.

Table 2. Selected Alternative Treatments

Slashing and Prescribed Burn	1,045 ac.	<ul style="list-style-type: none"> - Used in stands where whitebark pine was historically the dominant species but is no longer a major component. - Small diameter trees, generally less than 5 inches in diameter at breast height, would be cut to develop a continuous fuel bed. - It is estimated that 10 to 15% of the small diameter trees in 2- to 5-acres parcels would be cut. - Parcels would be randomly placed to cover roughly 25 to 50% of the units. - The slashing would be followed by prescribed burning to prepare a seedbed for regeneration of whitebark pine.
Potential Secondary Burn Areas	297 ac	<ul style="list-style-type: none"> - No firelines would be constructed prior to prescribed burning. - Natural barriers, such as ridgetops, rock outcrops, and similar features would be used. Creeping, low intensity fires outside the slashed area are expected and predicted to be acceptable from a fire management standpoint.
Whitebark Pine Release Cutting	388 ac	<ul style="list-style-type: none"> - Used in stands with adequate numbers of whitebark pine trees; however the whitebark pine are under excessive competition from other species, including brush, subalpine fir, lodgepole pine, and Engelmann spruce. - Work would be done in some irregular and continuous patterns.
Total	1730 ac	

Acres are approximations based on field visits, GIS data, timber stand data, aerial photos and other sources of data

My decision also includes the required design criteria described in the EA (EA pages 2-25 through 2-28) to protect resources and minimize or avoid potential impacts to other resources within the project area.

Cultural resources will be protected; in particular Russell Trail #179, and historic cabins and lookouts near Cutoff Peak, Russell Peak, Fisher Peak and elsewhere. These measures are estimated to have a high level of effectiveness.

Noxious weeds will be monitored and treated as appropriate according to guidelines in the Bonners Ferry Ranger District Noxious Weed Control FEIS and ROD. These measures are estimated to have a high level of effectiveness for new weed invaders and a moderate to high level for existing infestations.

Public health and safety considerations will be met through public information services including news releases, contacts with recreational visitors, and signing at key locations. These measures are estimated to have a moderate level of effectiveness.

Prescribed burning will be conducted according to the North Idaho Smoke Management Memorandum of Understanding and IPNF policies for prescribed burning. These measures are estimated to have a high level of effectiveness.

Soil resources will be protected by burning only when soil moistures are at or above 25 percent prior to initiation of prescribed burning. These measures are estimated to have a high level of effectiveness.

No slashing will be conducted within Riparian Habitat Conservation Areas and there will be no construction of hand line or machine line for fire control. These measures are estimated to have a high level of effectiveness.

Inland Native Fish Strategy measures will be applied. In drainages with landtype 334, stream buffers will be extended to a break in slope in order to ensure the stream channel will not be affected. These measures are estimated to generally have a high level of effectiveness.

No whitebark pine trees, living or dead, will be cut, except those that are identified as safety hazards for the work crew during slashing operations. These measures are estimated to have a moderate to high level of effectiveness.

Within grizzly bear management units, activities will be coordinated to assure requirements for secure habitat and core areas are met. These measures are estimated to have a high level of effectiveness.

Visual effects of slashing will be minimized by use of the following guidelines, which have an estimated effectiveness of generally high:

- Stumps on the uphill side of trails should be 4 inches shorter or less and cut as flat as practical.
- As topography permits, slashing shall be out of sight of trails, peaks, viewpoints, and lakes by using natural buffers (vegetative screens and topographical breaks) and by maintaining a minimum 200-foot buffer for focal points. (Note – page 2-28 of the EA contains a typographical error showing this as a minimum of 00-foot buffer.)
- Slash areas in irregular shapes; avoid squares or perfect circles.

Crew camps will follow these guidelines:

- Within the area of the Trout Creek Recreation Project, use existing campsites as much as practical. In areas where campsites don't exist, or areas outside the Trout Creek Project area, locate campsites away from trails, peaks, viewpoints, lakes, etc. Use the most restrictive low-impact camping guidelines in all cases.
- Rehabilitate any camp area or cutoff trail made during whitebark pine restoration work.

PUBLIC INVOLVEMENT

Public involvement activities are described in Chapter 2 of the EA (EA pages 2-1 through 2-6).

Scoping began in June 2000 with a letter to interested individuals, public agencies, the Kootenai Tribe of Idaho, and various environmental groups. This project first appeared on the Quarterly Schedule of Proposed Actions in November 2000.

Several environmental groups, the Kootenai Tribe of Idaho, and the Idaho Fish and Game responded to either the scoping letter or the Quarterly Schedule (project file Public Involvement documents #3 through #8, #12, and #14 through #18).

Through numerous phone calls and meetings, one individual representing several groups, voiced opposition to any treatments within the Long Canyon drainage. Their primary concern being that this project could set precedence for management activities in Long Canyon and that the Forest Service would then propose timber sale projects in this area.

One other environmental group was pleased with the project proposal because it did not utilize timber harvest to meet the restoration objectives. Other groups only requested to remain on the mailing list for this project. The Kootenai Tribe of Idaho also requested to remain on any further mailings related to the project. The Idaho Fish and Game is supportive of the project.

The EA was mailed to the public in late May, 2004 and the 30-day comment period commenced on June 1, 2004. Six letters of comment were received, including one individual from the local community, the Idaho Department of Fish and Game, the Idaho Native Plant Society, and three regional environmental groups (project file comment letters 01 through 06). The substantive comments from the letters and the responses are contained in the appendix to the Decision Notice.

I considered the scoping comments and the comments on the EA in my determination of which alternative and design features to implement for the current whitebark pine restoration activities in the Selkirk Mountains.



RATIONALE FOR MY DECISION

I have decided to implement Alternative 4 after evaluating each of the alternatives using the following criteria:

- How the alternative meets the purpose and need for action as described in Chapter 1 of the Environmental Assessment.
- How the alternative provides consistency with the Forest Plan.
- How well the alternative responds to environmental issues identified by the public, other agencies, and the Forest Service.

The following discussion describes my rationale based on those criteria.

Purpose and Need for Action

This section describes the reasons I am implementing activities to begin restoration of whitebark pine in the Selkirk Mountains and my goals for the project. It begins with the purpose and need, with summaries of the selected alternative's response to the needs. This is followed by the ways the alternative is consistent with the Forest Plan. The final discussion concerns the issues associated with the project and how my selection of Alternative 4 responds to those issues.

The purpose and need for the Whitebark Pine Restoration project were derived from the results of monitoring mortality in the whitebark pine ecosystem in the Selkirk Mountains (EA pages 3-7 through 3-9; Kegley, et. al., 2000 and 2001; Zack, 1995; IPNF 2002 Monitoring Report) and broad-scale assessments described in the Whitebark Pine Restoration EA (Chapter 1 "Overview of Scientific Findings").

Research has documented the rapid decline of whitebark pine throughout much of the western United States, primarily due to white pine blister rust, fire suppression and forest succession, and mountain pine beetle. The whitebark pine stands in the project area are successional species that are subject to replacement by subalpine fir. They depend on periodic fire for renewal. (EA page 4-2)

Based on this information the three-fold purpose and need, or objectives, for entering the Whitebark Pine project area are to:

- 1) Restore forest health and maintain whitebark pine in the ecosystem through manipulation of the composition and structure of designated stands by:
 - a. Returning whitebark pine stocking levels to those within the historic range of variability, creating adequate seedbeds for natural and artificial regeneration.
 - b. Reducing competition with other species, especially subalpine fir, in areas where adequate numbers of whitebark seedlings currently exist, but are being out competed by more shade-tolerant species.
 - c. Protecting healthy seed-producing whitebark pine trees from insect damage and mortality with applications of mountain pine beetle protectants, including non-host volatiles (NHVs) and verbenone.

Discussion: Prescribed treatments included under Alternative 4 will trend approximately 1,730 acres of currently dysfunctional stands into young, healthy stands of functioning whitebark pine

(EA page 4-11). Slashing and prescribed burning in stands where whitebark pine is no longer the major component it was historically will begin the process of returning stocking to levels closer to historic conditions (EA page 4-3). Whitebark pine release cutting in stands with adequate numbers of whitebark pine under excessive competition from other species will reduce the competition and mimic the effects of low intensity and mixed severity fires that historically thinned the competing species (EA page 4-5).

2) Reintroduce the role of fire in the ecosystem.

Discussion: Fire has played a major role in shaping and maintaining the ecosystems in the Selkirk Mountains. Following the introduction of white pine blister rust, fire suppression is the second most important factor in decline of the whitebark pine populations. Whitebark pine is a shade-intolerant species that requires canopy openings for regeneration. Over time, if there is no significant canopy-opening disturbance, such as fire, it will eventually be replaced by other species. In the high elevation areas across much of the Idaho panhandle, the combination of blister rust mortality, infestations of mountain pine beetle, and effects of fire suppression have come together with a resulting serious loss in the whitebark pine component. (EA pages 1-3 and 1-4)

Alternative 4 treatments respond to this as follows: The slashing and prescribed burning treatments will directly return fire to the whitebark pine ecosystem. The whitebark pine release cutting mimics the effects of low intensity and mixed severity fires (EA page 4-5); thus indirectly achieving results similar to fire.

3) Provide for wildlife habitat diversity.

Discussion: Whitebark pine occupies the most severe, highest elevation forested sites in our ecosystems; growing in isolated populations often separated by many miles of lower elevation ground from the next whitebark pine population. At the highest elevations, it may be the only tree that can tolerate the severe conditions and it may effectively raise the tree line several hundred feet in elevation above where it might be otherwise. (EA page 1-4)

The concerns for loss of the whitebark pine component include potential effects on wildlife habitat. Whitebark pine has large nutritious seeds that are an important food source for grizzly bear, black bear, Clark's nutcracker, and red squirrel. A decline in whitebark pine seeds as a food source represents a deterioration of grizzly bear foraging habitat. If whitebark pine were to disappear from the local landscape, carrying capacity for grizzly bears may be reduced in affected BMUs due to forage limitations. As a primary food source for Clark's nutcrackers, loss of this food source would effect their populations. (EA page 1-4)

Alternative 4 responds to wildlife habitat diversity needs by implementing restoration treatments on about 1,730 acres of whitebark pine, a keystone component (D. Perkins, 2002; project file) of the ecosystem.

Consistency with the Forest Plan

The IPNF Forest Plan provides direction for all resource management programs and resource activities on the IPNF. Three specific Forest Plan goals (Forest Plan, p. II-1 & II-2) guided development of the Purpose and Need. (EA page 1-10)

These specific goals are:

- Provide for a diversity of plant and animal communities.
- Provide efficient fire protection and fire use to help accomplish land management objectives.
- Manage the forest resources to protect against insect and disease damage.

Discussion: As described in the EA, pages 3-1 through 3-14, disturbance such as fire and insect mortality played an important role in determining forest composition. In northern Idaho, fire was the most significant historic natural disturbance. The long-lived whitebark pine was an important species on the very high elevations. Typically established after some form of disturbance, they have the potential to occupy a site for 200 to 300 years or longer. More recently, land management activities and introduced pathogens have dramatically altered species and age composition of the vegetation. As described above, the combination of introduced white pine blister rust, mountain pine beetle outbreaks, and fire suppression is leading to a substantial loss in the whitebark pine component of the high elevation ecosystem.

There are many Forest Plan Standards applicable to the general design of the whitebark pine restoration project. Standards (Forest Plan, pp. II-32, II-39, and II-39) applicable to the general design of the proposed action are:

- Fire will be used to achieve management goals according to direction in management areas.
- Vegetation management will favor the use of fire, hand treatment, natural control, or mechanical methods whenever feasible and cost effective. Direct control methods, such as chemical or mechanical, may be used when other methods are inadequate to achieve control.
- Reforestation will normally feature seral tree species, with a mixture of species usually present. Silvicultural practices will promote stand structure and species mix that reduce susceptibility to insect and disease damage.
- Project design will provide for site preparation and slash hazard reduction practices that meet reforestation needs of the area. (EA page 1-10)

Discussion: My selected alternative responds to the Forest Plan goals and standards by implementing treatments on about 1730 acres to begin restoration of whitebark pine in the ecosystem. Two treatment methods will be used – slashing and prescribed burning, and whitebark pine release cutting. Stands where whitebark pine was historically a major component, but is no longer dominant, will be treated by slashing and prescribed burning. Small diameter trees of competing species will be slashed in varying amounts, creating a fuel bed that will then be burned under specific conditions. Where the stands contain adequate numbers of whitebark pine trees, but other species are crowding them excessively, the competing trees and brush will be cut in order to make whitebark pine the dominant species once again.

These treatments will create suitable areas for natural regeneration of whitebark pine seedlings (EA page 4-4). The areas have been selected for proximity to viable whitebark pine populations, size of the treatment areas and potential for Clark’s nutcracker to cache whitebark pine seeds.

The majority of the treatment sites are in locations that have the highest potential to naturally regenerate substantial amounts of whitebark pine (EA, page 4-6). As the project is implemented, we will review the effectiveness of the first treatments and determine if any areas will need to be planted with blister rust resistant whitebark pine seedlings in order to meet our restoration goals.

It is also important to be aware of the risk of insect damage to seed-producing whitebark pine trees. The future use of a blend of verbenone and non-host volatile “protectants” may be appropriate to reduce risk of mortality caused by mountain pine beetle. This product, which has been shown to disrupt mountain pine beetle activity, would be used in accordance with current Forest Service handbook direction and policies.

Alternative 4 will provide diverse plant and animal communities as described in Chapter 4 of the EA and within detailed discussions elsewhere in this Decision Notice. It uses fire to protect resources and to help accomplish land management objectives for restoration of whitebark pine, including reducing risks from fire, insects and disease. Research scientists from the Rocky Mountain Research Station and Forestry Sciences Laboratory have recognized that, “To manage whitebark pine in the presence of blister rust, it becomes critical to address another major threat, fire exclusion. The most cost effective and ecologically responsible approach to the restoration of whitebark pine habitat is to mimic natural fire regimes.” (project file document 2-9-01).

Environmental Alternative-Driving Issues

The following alternative-driving issues (used to develop the action alternatives) were identified through the internal and external scoping processes. The anticipated effects on these issues were evaluated based on a set of “Issues and Indicators.” This discussion of issues explains how the selected alternative is responsive to the public and internal concerns and compares it to the other action alternatives as well as taking no action at this time.

- Vegetation – Forest Composition and Structure
- Recreation Opportunities, Proposed Wilderness Areas, Associated Visual Quality
- Wildlife – Woodland Caribou Habitat
- Water Resources (includes fisheries)
- Inventoried Roadless Areas

The “Other Resource Concerns” listed in Chapter 2 (page 2-4) of the EA were responded to by changing the design of the alternatives or by avoiding areas. These issues did not warrant development of any separate alternatives and were discussed in Appendix A of the EA. Some of these issues are included below when it is helpful in understanding the differences between alternatives and my reasoning for selecting Alternative 4 for implementation.

Forest Composition and Structure

The current composition and structure are not representative of their historic range. The majority of the whitebark pine stands within the project area are mature, with only limited amounts of young seedling and sapling sized stands. Aggressive fire suppression during the past 70 years contributed to this narrow range of age classes and encouraged the growth of more shade-tolerant species, primarily subalpine fir, to dominate these sites. (EA page 2-2)

White Pine Blister Rust

White pine blister rust is a fungus that affects five-needled pine of all ages. Whitebark pine is extremely sensitive to this fungus, which is now significantly and continuously reducing the whitebark pine population. On mature whitebark pine, blister rust usually kills the tops of the trees first, reducing or eliminating their seed producing potential. (Forest Plan Monitoring Report 2002, page 72)

Over the past several decades, throughout the project area thousands of whitebark pine trees have died from this disease. All of the stands targeted for treatment have been infected with the white pine blister fungus for decades. Even with the relatively high levels of mortality caused by the blister rust fungus an adequate number of healthy trees have persisted, due to a natural resistance to this disease. In turn, these healthy trees have provided a seed source for potentially blister rust resistant seedlings and continued natural regeneration of whitebark pine. Details of cone collection and screening for blister rust resistance are included in the 2002 Forest Plan Monitoring Report (Forest Plan Monitoring Report 2002, page 72). (EA page 2-2)

Mountain Pine Beetle

Mountain pine beetles are typically attracted to the largest trees (greater than 5” in diameter); they do not distinguish between blister rust resistant and non-resistant trees. This has led to the mortality of many otherwise healthy trees.

Recently, mountain pine beetle infestations have been killing whitebark pines in the Selkirk Mountains in alarming numbers. Aerial surveys in 1999 discovered a major mountain pine beetle outbreak. Ground surveys in 2002 and 2001 showed that the outbreak was very large, still growing and killing a high percentage of whitebark pine trees in some areas. As reported in the 2002 Forest Plan Monitoring Report, “Given the high rate of infection from blister rust, compounded by this mountain pine beetle outbreak, we are very concerned about the future of whitebark pine on this National Forest. The pattern we’re seeing here looks similar to what previously happened in other areas of the Forest... where the combination of blister rust and mountain pine [beetles] has killed the overwhelming majority of the whitebark pine, and appears to have largely removed it as a functioning component of the ecosystem in those local areas.” (Forest Plan Monitoring Report page 75)

Table 3. Principle Issues and Indicators: Forest Vegetation

Principle Issue	Principle Issue Indicators
Restoration of the Whitebark Pine forest type	Acres of forest treated that will lead to stands dominated by whitebark pine or that will create conditions favorable to the establishment of whitebark pine seedlings by Clark’s nutcracker. <u>Discussion:</u> 1730 acres treated with slash/burn or release cutting.
Reintroduction of fire into the ecosystem	Acres burned to allow for natural or artificial regeneration of whitebark pine seedlings. <u>Discussion:</u> 1045 acres treated with slashing and prescribed burning plus the potential for 297 acres of secondary burn = 1342 ac . (This is included in the 1730 acres shown above.)

Acres are approximations based on field visits, GIS data, timber stand data, aerial photos and other sources of data

How the Selected Alternative responds to these Issues and the Forest Vegetation portion of the Purpose and Need for the project

Alternative 4 is a conservative approach in this initial effort to maintain the whitebark pine within the Selkirk Mountains. Even though it does not include as many potential treatment areas, it substantially meets my goals for forest health and whitebark pine restoration in the treated areas. Currently, of the stands in the project area that are capable of supporting whitebark pine we estimate only about 16 percent are actually dominated by the species. Alternative 4 is anticipated to increase their dominance to 25 percent of the stands. About 1,323 acres of treatment will take place in areas that have been identified as having high potential for natural regeneration of whitebark pine. The regeneration potential is based on the amount of healthy whitebark pine in or close enough to the area to provide a seed source, the probability of Clark's nutcrackers caching seeds, and the anticipated effectiveness of the treatments in reducing competing trees and providing openings for Clark's nutcracker. (EA pages 4-6 and 4-7)

As the project is implemented and we learn more about maintaining whitebark pine ecosystems, we can assess the probable effectiveness of treating additional areas. As identified in the EA, there are extensive whitebark pine restoration needs in the Selkirk Mountains. The selected alternative is expected to be an important part of this restoration process. District personnel will be able to refine what is learned from this project and apply it to future whitebark pine restoration efforts, when or if they are proposed.

The selected alternative will also effectively return the role of fire in maintaining whitebark pine. Treatment areas have been identified for approximately 1,045 acres of slashing and prescribed burning. Fire behavior analysis indicates an additional 297 acres, approximately, have the potential for treatment as secondary burn areas. (EA pages 4-6) Because the project does not include construction of firelines, it is expected and acceptable from a fire control aspect that the prescribed burn will creep outside the primary treatment areas. These secondary burn areas were identified and their potential effects on other resources were analyzed in the EA. (EA pages 4-4 through 4-7)

Alternative 4 will conduct whitebark pine release treatments on approximately 388 acres where adequate numbers of whitebark pine trees will provide potential for natural regeneration after competing shrubs and tree species are thinned and left on site. The thinning will reduce competition and make whitebark pine the dominant species, as it was historically.

My selected alternative is consistent with the IPNF Forest Plan and other regulations for vegetation and fire management. (EA pages 4-10, 4-11, 1-9 through 1-11)

Comparing the Selected Alternative with Alternatives 1, 2, and 3

Alternative 1 (No Action) would have deferred all treatments at this time. All actions alternatives (Alternatives 2, 3, and 4) would trend treated stands toward a long-term increase in whitebark pine populations and reintroduce the role of fire through the use of prescribed fire, thus meeting these parts of the purpose and need. The following table shows the total acreage that would have been treated and the acres with high potential for natural regeneration, as well as the acreage where prescribed fire would be used, under each alternative.

Table 4. Alternative Comparison

Vegetation Principle Issues	Alt 1	Alt 2	Alt 3	Alt 4 Selected
Total Treatment Acres	0	7,266	2,062	1,730
Acres with High Potential for Natural Regeneration (included in total treatment acres)	0	3,712	1,323	1,323
Acres where fire is reintroduced to ecosystem (prescribed burning)	0	6,249	1,461	1,342

Acres are approximations based on field visits, GIS data, timber stand data, aerial photos and other sources of data

Recreation Opportunities, Proposed Wilderness Areas, Associated Visual Quality

Much of the existing whitebark pine is located in and around popular recreational areas including high elevation lakes and connecting trail systems in the Ball Creek, Trout Creek, Long Canyon, Fisher Creek, and Smith Creek drainages. Slashing and burning of ridgetops within view of these areas could disrupt recreational activities and alter visual quality. (EA pages 2-3 and 2-4)

Some of the whitebark habitat is located within the proposed wilderness management area (MA 11) that occurs in a portion of the upper reaches and higher elevations of Long Canyon and Trout Creek. While management for disease/insect infestations in these areas using prescribed fire is not precluded under Forest Plan direction, there is concern in some arenas about the appropriateness of using prescribed fire in roadless areas or proposed wilderness areas. However, authority for manager-ignited fire in wilderness is delegated to Forest Supervisors who can grant approval for this use of prescribed fire as long as it is consistent with their Forest Plan. (EA, page 2-3)

Specifically, the IPNF Forest Plan standards for MA11 state, “Prescribed Fire. Identify specific areas where prescribed fire may be beneficial and cost effective in achieving the objectives of the management area.” (Forest Plan page III-50.) Forest Plan objectives for Roadless Areas are, “...managed based on the direction and goals established for the respective management area within which they are located.” (Forest Plan page II-4)

Table 5. Principle Issues and Indicators: Recreation Opportunities, Proposed Wilderness Areas, Associated Visual Quality

Principle Issue	Principle Issue Indicators
Protect wilderness values consistent with the Forest Plan direction.	Use of management-ignited fires in proposed wilderness.
Consistency with existing guidelines and closures developed under the Trout Creek project (Decision 5/4/95)	Physical, social and managerial factors: a) Physical remoteness and evidence of humans b) Social setting – Solitude while traveling and camping c) Impact to recreation features
Acceptability of changes to the recreation environment for those lands outside of the Trout Creek Area Recreation Project.	Physical, social and managerial factors: a) Physical remoteness and evidence of humans b) Social setting – Solitude while traveling and camping c) Impact to recreation features
Scenic integrity consistent with Selkirk “sense of place.”	a) Physical and social impacts to the recreation experience as viewed from prominent viewpoints within the project area. b) Physical and social changes to the recreation experience as viewed from prominent viewpoints outside the project area.

How the Selected Alternative responds to these Issues and the Recreation portion of the Purpose and Need for the project

Alternative 4 was specifically developed in response to public comments and concerns about any forest management within proposed wilderness areas (designated as Management Area 11 in the Forest Plan.) As displayed in the attached map of Alternative 4, there will be no treatment within the MA11 lands in the headwaters of Long Canyon Creek. (EA pages 2-22 and 2-23)

Alternative 4 is the only one, other than No Action (Alternative 1), that responds to public comments about setting precedents in Long Canyon and internal considerations about use of prescribed fire in MA11 lands. Since Alternative 1 did not respond to any elements of the purpose and need for the whitebark pine project, I did not consider it appropriate management for the area.

In addition to not entering MA11 lands, my selected alternative is most compatible with both long-term (greater than 3 consecutive years) and short-term goals and guidelines in the Trout Creek Recreation decision. Although there will be some short-term inconsistencies generally of a social nature (such as views of treatment areas and sounds of work activity) in the more remote portions of the area, the maintenance of whitebark pine justifies these deviations from the guidelines. (EA pages, 4-27 and 4-28)

Outside the Trout Creek Recreation project area, the *physical* remoteness would not be affected. The *sense* of remoteness would be disturbed during work activities, but would return to its current level when the work is finished (EA page 4-22) by implementing the design features discussed earlier and listed on pages 2-25 through 2-28 of the EA.

Table 6. Alternative Comparison

Recreation Principle Issue or Issue Indicator	Alt 1	Alt 2	Alt 3	Alt 4 – Selected
Use of management-ignited fire in proposed wilderness (MA11)	No	Yes	Yes	No
Consistency with existing guidelines and closures developed under the Trout Creek Recreation Project Decision	Fully consistent	Least consistent	Consistent with most goals, had some short-term inconsistencies	Most compatible action alternative for both long-term and short-term goals.
Acceptability of changes to lands outside the Trout Creek Area Recreation Project.	Fully acceptable	Short-term effects during work activities	Same as Alts 2 and 4	Same as Alts 2 and 3
Scenic integrity consistent with Selkirk “sense of place.”	Fully Consistent	Greatest potential for visitors to observe work activities and short-term evidence of mechanical or burning treatments.	Mid-range potential for visitors to observe work activities and short-term evidence of mechanical or burning treatments.	Least potential for visitors to observe work activities and short-term evidence of mechanical or burning treatments.

The project’s required features (EA pages 2-25 through 2-28) resulted in essentially the same *types* of changes in scenic integrity and the Selkirk “sense of place” under all action alternatives (EA pages 4-27 and 4-28.). Differences would be from the fact that the alternatives treat varying amounts of the landscape and some locations treated in Alternative 2 are excluded from Alternatives 3 and 4. There will be short-term visual impacts of stumps and blackened areas; however, greenup will start within the first year and the effects in the background and middle ground will decrease over time. In the long-term, from a distance, my selected alternative is consistent with the line, form, and texture in the Selkirk landscapes. (EA page 4-15) Again, whitebark pine trees are an integral part of the high elevation environment and recreation experience. Maintaining the rapidly declining whitebark pine populations within the Selkirk Mountains justifies potential short-term deviations from the Trout Creek Recreation Project guidelines (EA page 4-27.)

My choice of Alternative 4 is consistent with the IPNF Forest Plan goals and standards for recreation within Management Areas 9, 10 and 11 (EA pages 2-3 through 2-4, 3-21); and other regulations. (EA pages 4-12 through 4-28)

Woodland Caribou Habitat

The Selkirk Mountain population of woodland caribou is generally found above 4000 feet elevation in Engelmann spruce/subalpine fir and western red cedar/western hemlock forest types. They are highly adapted to upper elevation boreal forests and do not occur in drier low elevation habitats except as rare transients. Past timber harvest, fire suppression, and road building have reduced and fragmented habitat in the analysis area. (EA pages 2-4)

Issue indicators focus on the amount of suitable habitat that may be impacted by the proposed treatments. Potential changes were measured by the number of acres of seasonal habitats impacted by slashing/prescribed burning, thinning, or only prescribed burning of stands within the caribou management units.

Table 7. Principle Issues and Indicators – Woodland Caribou

Principle Issue	Issue Indicators
Changes to seasonal habitats	Acres of suitable habitat treated in primary treatment areas. Acres of suitable habitat treated in secondary burn areas.

How the Selected Alternative responds to this issue and the wildlife portion of the Purpose and Need

Alternative 4 is a modification of Alternative 3, which was designed in part to respond to concerns about potential effects to woodland caribou habitat. Compared to the proposed action in Alternative 2, my selection of Alternative 4 reduces activities in currently suitable caribou habitat by approximately 2,500 acres of primary treatment and more than 860 acres of secondary treatment (EA pages 4-34 and 4-39).

This alternative will have less influence on seasonal habitats and is unlikely to cause substantial effects to woodland caribou. The whitebark pine treatments will be concentrated during late summer and early-fall in open-canopied stands that mainly serve as later winter or spring/calving habitat. The treatment areas are on high windswept ridges that do not produce significant amounts of forage and the timing of activities makes it unlikely caribou will be using the areas during project work. No substantial effects are anticipated. (EA pages 4-37 through 4-41).

My selection of Alternative 4 is consistent with the IPNF Forest Plan and other regulations. (EA page 4-41) The U.S. Fish and Wildlife Service concurs with the determination of effects to wildlife habitat/species in the project area (project file letter June 2, 2004.)

Table 8. Alternative Comparison

Caribou Issue Indicators	Alt 1	Alt 2	Alt 3	Alt 4 Selected
Acres of suitable habitat treated in primary treatment areas.	0	2,967	650	466
Acres of suitable habitat treated in secondary burn areas.	0	1,014	187	146
Determination of Effects to Woodland Caribou	No Effect	Not Likely to Adversely Effect	Not Likely to Adversely Effect	Not Likely to Adversely Effect

Acres are approximations based on field visits, GIS data, timber stand data, aerial photos and other sources of data

As shown in the comparison table, Alternative 4 treats considerably fewer acres (about 85% less) in suitable caribou habitat than Alternative 2, and over 25% fewer than Alternative 3. Alternative 4 will not change percentages of habitat components in the Long-Parker CMU and will affect the same 217 acres of *key habitat* as Alternative 3 in the Trout-Ball CMU (EA page 4-38). All action alternatives would retard the conversion of treated stands to suitable foraging habitat; however, this will happen on a considerably smaller scale under my selected alternative. In areas where treatments occur, the long-term risk of catastrophic fire will be reduced, bringing with it a reduced risk of loss of caribou habitat in the event of a catastrophic fire (EA page 4-33).

Water Resources and Aquatics Habitat

Water resources were another consideration in the design of Alternative 3 (EA page 2-15.) The primary watershed issue was identified as the potential effect on the water quality. My selected alternative responds to this issue by treating a smaller percentage of the area and locates treatments on fewer acres of sensitive landtypes. (EA pages 2-4 and 2-5)

The following table defines the principle water resource issue and the indicators used to evaluate the effects of the proposed treatments.

Table 9. Principle Issues and Indicators –Water Resources

Principle Issue	Issue Indicators
Water Quality: Potential for increased runoff, erosion and sediment delivery to stream channels with associated increases in nutrient delivery.	a) Percent of area treated. b) Acres of sensitive landtype within treatment areas.

The primary beneficial use for Myrtle Creek is its role as the municipal water supply for the City of Bonners Ferry, Idaho. Residents of Bonners Ferry are concerned about the quality and quantity of their domestic water obtained from Myrtle Creek and its tributaries. Thus, water quality in the Myrtle Creek drainage was of specific concern.

How the Selected Alternative responds to this issue and the water resources portion of the purpose and need

The alternative I have selected, Alternative 4, will treat the smallest percentage of the project area, 1.2%; compared to 1.5% under Alternative 3, or 5.1% under Alternative 2. In addition, the activities will take place on the smallest amount of sensitive landtypes, 12 acres, compared to 51 acres under Alternative 3, or 241 acres under Alternative 2. (EA page 4-72) No effects are expected from activities on sensitive landtypes.

There are four ‘sensitive landtypes’ within the treatment areas: 103, 180, 332 and 334 (EA pages 4-65 through 4-68.) Landtype 180 is the only sensitive landtype potentially affected under Alternative 4. The main type of vegetation on this landtype is shrubs and forbs; some areas have no vegetation. No whitebark pine is found on this landtype; therefore, no areas on landtype 180 will be targeted for treatments. Analysis of the predicted behavior of the prescribed burning indicates that some of the secondary burn may spread into the edges of landtype 180 locations. Given the small percentage of this landtype within the treatment areas and the expected fire behavior, no effects to aquatic resources are expected (EA page 4-66).

The whitebark pine restoration project proposed three treatment methods: whitebark pine release, slash and burn, and burn only. The treatments would have no direct or indirect effects on aquatic resources, under any of the action alternatives, for the following reasons:

- No heavy machinery will be used,
- No firelines will be constructed,
- The treatment locations (generally on ridgetops and some portion of upper valley slopes),
- The treatment prescriptions (whitebark pine release would reduce the canopy cover by only 10 to 25% and the slash/burn would decrease stem density only 10 to 25% in up to 50% of the treatment area)
- The lack of stream channels in the immediate vicinity of treatment areas,
- The risk of fires burning into RHCAs is very low,
- The small percentage of the watersheds being treated, and
- The design features of the project (use of Inland Native Fish Strategy management measures, and BMPs).

Alternative 1 would have no effects on watershed resources since no treatments would occur. Alternative 2 included the most acres of total treatment, the most treatment on sensitive landtypes and included all three types of treatment. It included about 800 acres of treatment in the Myrtle Creek drainage, which is the municipal watershed for the City of Bonners Ferry; Alternatives 3 and 4 do not include treatments in the municipal watershed. Alternative 4 does not include the burn only treatment.

Table 10. Alternative Comparison

Principle Issue and Indicators	Issue Indicators	Alt 1	Alt 2	Alt 3	Alt 4 Selected
Water Quality: Potential for increased runoff, erosion and sediment delivery to stream channels with associated increases in nutrient delivery.	a) Percent of area treated.	0	5.1%	1.5%	1.2%
	b) Acres of sensitive landtype within treatment areas.	0	241 ac.	51 ac.	12 ac.
Effects on water resources		None	None	None	None
Effects to fisheries		None	None	None	None

Acres are approximations based on field visits, GIS data, timber stand data, aerial photos and other sources of data.

Percentages, based on the approximate acres, are also approximate.

Nowhere within the project area will there be any immediate measurable change in runoff, erosion, or sediment delivery potential. There will not be any direct or indirect effects to aquatic resources and no effects to fish habitat. (EA page 4-63)

The primary beneficial use of Myrtle Creek is providing a municipal water supply (EA page 2-5). No streams in the project area are listed under the 303(d) list for a pollutant of concern (EA page 4-73). The selected alternative is consistent with Forest Plan requirements for aquatic resources, as well as fisheries under the Inland Native Fish Strategy, and other federal and state standards. (EA pages 4-72 and 4-73)

Inventoried Roadless Area

The majority of the Whitebark Pine project area is within the Selkirk Roadless Area (01125). The overall project proposal included slashing of small diameter trees to create a fuel bed for prescribed burning; prescribed burning without prior slashing; and whitebark pine release in the roadless area. No road construction or commercial timber harvest is proposed within the roadless area. (EA pages 2-5 and 2-6)

An alternative that did not include management of whitebark pine stands within the Selkirk Roadless Area was developed but eliminated from detailed study. The interdisciplinary team determined that not enough of the critical areas would be treated to meet my objectives of maintaining whitebark pine and reintroducing the role of fire into the ecosystem. (EA page 2-7) This alternative would have treated less than 30% of the area included in my selected alternative.

Table 11. Principle Issues and Indicators – Roadless Area

Principle Issue	Issue Indicators
Modification of Undisturbed Land	Acres of land modified by slashing and prescribed burning.
Road construction	Number of miles of road construction.

How the Selected Alternative responds to these issues

Alternative 4 will utilize slashing and prescribed burning on fewer acres than either Alternative 2 or 3; it does not include any burn-only treatments. None of the alternatives included road construction. (EA page 4-6)

Table 12. Alternative Comparison – Roadless Area

Issue Indicators	Alt 1	Alt 2	Alt 3	Alt 4
Acres of land modified by slashing and prescribed burning (EA pg 2-25) (includes potential secondary burn areas)	0	6,300	1,674	1,342
Number of miles of road construction.	0	0	0	0

Acres are approximations based on field visits, GIS data, timber stand data, aerial photos and other sources of data.

My decision includes required features that will help ensure that the area’s natural integrity and appearance remain “natural” when viewed from a distance (EA pages 2-27 and 2-28). There is limited potential that, for a few years, small diameter stumps could be seen by the occasional cross country traveler. However, since the stumps would be blackened by the prescribed fire, they would not be immediately obvious. The heavy snowloads at these high elevations would help them

decompose quickly. Because Alternative 4 treats fewer acres, it would have the least effect on natural integrity and appearance. (EA page 4-74)

Opportunities for solitude and remoteness could be affected while work crews are in an area; however, with most of the work scheduled after the Labor Day holiday, recreation use would be low during activities, further reducing the likelihood of recreationists encountering crews or activities. (EA page 4-74) The Roadless area covers nearly 102,000 acres (EA page 4-75); since the treatments total about 1,730 acres (less than 2% of the area) there will be very adequate area to obtain solitude and remoteness in both the short- and long-term.

Alternative 4 will not change areas for primitive recreation opportunities because the slashing and burning operations will not have any direct or indirect effects on those opportunities (EA page 4-75).

Unique features will not be impacted negatively by the selected alternative. For instance, Trails #7, #13, and #15 are among seven primitive trails that access the heart of the Trout Creek Recreation Project area. They do not traverse any of the treatment areas and would not be physically changed by the whitebark pine restoration project (EA page 4-20). The historic Burton cabin is unique, provides a glimpse into the district's past, and has wide appeal to backcountry recreational users. It will be protected along with other historic cabins and lookout towers as described in the Chapter 2 Required Design Criteria for cultural resources. (EA page 4-23) This project has been designed to maintain the unique qualities that the presence of whitebark pine adds to the area's recreational experience.

The manageability and boundaries of the Selkirk Roadless Area will not be changed; none of the alternatives affected the size or shape of the inventoried roadless area. (EA page 4-75)²

Compatibility with the Roadless Area Conservation Rule

On July 16, 2004, the U.S. Department of Agriculture published a Notice of Proposed Rulemaking in the Federal Register to replace the Roadless Area Conservation Rule (36 CFR part 294 (66 FR 3244)) adopted January 12, 2001 but subsequently permanently enjoined in Federal Court July 14, 2003. The Roadless Area Conservation Rule would be replaced with a petitioning process providing Governors an opportunity to seek establishment of management requirements for National Forest System inventoried roadless areas within their states. The Department also reinstated interim direction regarding Delegation of Authority and Interim Protection of Roadless Areas. The interim direction is being reinstated because of the continued legal uncertainty of implementing the Roadless Area Conservation Rule (36 CFR part 294).

For the reasons discussed above, the alternative I have selected for implementation (Alternative 4) is compatible with direction on inventoried roadless areas.

3. OTHER ALTERNATIVES CONSIDERED

The Whitebark Pine Restoration EA considered four alternatives, identified as Alternative 1 – No Action, Alternative 2 – modified Proposed Action, Alternative 3, and Alternative 4 (selected alternative). This section briefly describes Alternatives 1, 2, and 3 and my rationale for not selecting any of them for implementation.

ALTERNATIVE 1 - NO ACTION

The no action alternative, required by NEPA, provides analysis of the baseline (existing) conditions and the probable outcomes of not taking any action at this time; serving as a way to compare effects of other alternatives.

Implementation of this alternative would defer all treatment activities. Other activities such as fire suppression and routine trail maintenance would continue. Under the no action alternative, none of the slashing, prescribed burning, or whitebark pine release cutting would be undertaken to restore vegetative composition and structure. Whitebark pine would continue to decline.

REASONS FOR NOT SELECTING THE NO-ACTION ALTERNATIVE

Vegetation

As described earlier, the vegetation composition and structure, as well as disturbance and successional regimes in northern Idaho have been altered since European settlement (EA page 3-3). White pine blister rust, introduced in North America in the early 1900s, has killed tens of thousands of white pine and whitebark pine trees throughout the assessment area.

Data from a 2000 survey (EA page 3-9) of mortality from blister rust shows that between 70 and 90 percent of the whitebark pine trees in the Cutoff Peak, Ball Creek/Russell South, and Burton-Cascade areas had been killed. More than 60% had been killed in Trout Creek/Pyramid Pass, Trout Creek/Farnham Ridge, and Ball Creek/Russell East areas. The least amount of mortality was approximately 33 percent in the Ball Creek/Russell Mountain area. Documented mortality from mountain pine outbreaks ranges from about 15 percent in the Trout Lake area, to amounts between 25 and 45 percent in Cutoff Peak, Fisher Peak, Ball Creek/Russell Mtn, Ball Creek/Russell South, and Burton-Cascade; with more than 55 percent in Trout Creek/Farnham Ridge, about 75 percent in Trout Creek/Pyramid Pass. The greatest amount of mortality was approximately 90 percent in the Ball Creek/Russell East area.

The no action alternative would not meet the stated purpose and need, and would continue to trend these forests in a direction where the ability to meet desired forest composition and structure would be increasingly difficult. Across the Idaho Panhandle National Forests, observations show that as much as 95 percent of the whitebark pine have died in stands where it used to be a major component of the vegetation (EA page 1-3.) Further declines could have serious consequences.

In stands with high levels of blister rust infestation, most or all of the whitebark pine regeneration may become infected. As older trees die, there could be few to no young trees to take their place. The genetic implications would be serious. Continued fire suppression, combined with no use of prescribed fire, would trend the vegetation patterns even further away from historic conditions as seedling and sapling-sized whitebark pine are replaced by subalpine fir and spruce. Without prescribed fire to create suitable openings, it would be more difficult for Clark's nutcracker to cache seeds and promote whitebark pine regeneration. The subalpine zone forests would lose ecological and structural diversity; stands would be more vulnerable to large, severe, stand-replacing fires as well as insect and disease epidemics. (EA page 4-2)

The project interdisciplinary team discussed the question, “What would happen if the whitebark pine were lost in the Selkirk Mountains?” They concluded there would be the following consequences (project file IDT notes 5/18/00):

- The biology and diversity of these habitats would be lost.
- At these high elevation ecosystems, only three tree species exist – spruce, subalpine fir and whitebark pine. Losing one species could be critical, especially if disease or insects seriously impacted the spruce or subalpine fir.
- Fire regimes would change as the forest composition moves to more subalpine fir. The risk of catastrophic fire would increase, bringing with it an increased risk for loss of habitat for caribou (EA page 4-33) and lynx (EA, page 4-42).
- Wildlife species and diversity would be impacted. Effects would be both direct and indirect as follows: Clark’s nutcracker (by loss of food source), numerous species of migratory birds (by loss of habitat), squirrel populations (loss of food source), Canada lynx and fisher (loss of squirrels as a portion of their prey base), grizzly bear (loss of food source).
- Changes in the tree cover would have direct effects in these harsh high elevation environments; including effects on snow interception, snowmelt and water yield.

Recreation, Wilderness, and Visuals

Loss of the whitebark pine component would lead to eventual loss of its place as a unique and fundamental visual component of the wildlands in the Selkirk Mountains. The strong aesthetic association of whitebark pine with the sense of an untamed place would diminish over time. (EA page 3-19)

Wildlife

Deferring treatments at this time would facilitate the transition from whitebark pine to subalpine fir/spruce forests, in the short-term improving woodland caribou habitat. However, in the long term the trend toward increased fire risk in caribou habitat would continue. Since the high elevation, exposed ridges are often hit by lightning, the dead trees and increased fuel accumulations could provide a start zone or facilitate the spread of wildfire through the area. This could lead to a catastrophic stand replacing fire in the area. (EA page 4-33)

For Canada lynx habitat, continuing whitebark pine mortality would trigger increases in down woody material, possibly producing more denning habitat and enhancing existing denning habitat. However, forage habitat would be produced in small amounts. No action may contribute to further declines in the population density of their principal prey species. In the event of a wildfire, mixed-severity fire would be unlikely to alter large portions of available habitat, but a large stand-replacing fire would convert all affected stands to unsuitable habitat that would take 20 to 30 years to then support high densities of snowshoe hare. (EA page 4-42)

Whitebark pine would continue to decline in density and geographic distribution. As a result, this seasonal food source would become increasingly less available to resident grizzly bears. While there would be less disturbance in grizzly bear habitat since there would be no need for helicopter use or chainsaw work at higher elevations, this work creates an ephemeral point-source disturbance and extremely low risk of grizzly bear mortality. The declining food source, by contrast, represents a permanent deterioration of grizzly bear foraging habitat. If whitebark pine were to disappear from

the local landscape, carrying capacity for grizzly bears may be reduced in affected BMUs due to forage limitations. (EA pages 4-51, 4-52)

Black-backed woodpeckers have been described primarily as a species dependent upon habitat that results from a mixed lethal or stand-replacement fire that produces an abundance of snags. Interrupting the periodic disturbances created by lethal wildfires through continued fire suppression may threaten local populations of black-backed woodpeckers. Conversely, if a wildfire occurs in the project area that could not be suppressed, habitat may be enhanced. While Alternative 1 would not alter existing conditions, the abnormal levels of fuels from years of fire suppression have altered historic fire regimes, resulting in increased potential for catastrophic losses of potential habitat should a catastrophic fire occur. (EA page 4-58)

Water Resources and Aquatic Habitats

Under the no action alternative, there would be no change in the current management direction or intensity. Therefore, there would be no immediate measurable change in runoff, erosion, or sediment delivery potential. Slope stability would remain unchanged. No direct or indirect effects to aquatic resources would occur in this alternative. There would not be any effects to fish habitat. (EA page 4-66)

Some researchers recognize whitebark pine as an asset in the high elevation, harsh environments within watersheds. It is also valued for watershed protection by delaying snowmelt and retaining snowdrifts until early to mid-summer (D. Perkins, 2002; project file). Over time, the loss of whitebark pine trees would reduce this benefit.

Alternative 1 Conclusion

For the reasons described above, Alternative 1 would not have met my three decision criteria. It did not meet the purpose and need for this project, and would not have responded adequately to internal or public issues. In addition, it would not have been consistent with Forest Plan goals for ecosystem diversity, using fire to help accomplish land management objectives, and protecting against insect and disease damage in the whitebark pine ecosystem.

REASONS FOR NOT SELECTING ALTERNATIVE 2 (MODIFIED PROPOSED ACTION)

Alternative 2 fully meets the silvicultural objectives of the Whitebark Pine Restoration EA by restoring forest composition and structure and restoring the role of fire in the ecosystem. It would have done the most to trend the whitebark pine ecosystem toward desired stand composition and structure, because it treated the most acres (EA page 4-6) and treated the greatest amount of high potential areas (EA page 4-7). However, it only partially meets goals for wildlife habitat diversity. Additionally, it did not respond to concerns about management in MA11 proposed wilderness, particularly the Long Canyon drainage. This alternative also presented other resource concerns, which made it less favorable overall than Alternative 4.

Recreation, Wilderness, and Visuals

This alternative did the least to respond to public concerns about setting a precedent for active management within MA11 (proposed wilderness) lands, particularly in the Long Canyon drainage. Three areas in MA11 would have been treated by prescribed burning without slashing, including

over 600 acres of primary treatments and almost 200 acres of additional potential secondary burn. (EA page 2-10) Alternative 2 would also have treated approximately 2,060 acres of land classified as Primitive (EA page 4-17).

Although the project included features to minimize impacts to the visual element in the project area and to reduce other impacts to recreation, the *physical* remoteness and *sense of* remoteness would have been decreased (EA page 4-17).

Within the Trout Creek Recreation Project area, the amount of work included in Alternative 2 would have been inconsistent with the Trout Creek guidelines (EA page 4-18.) The treatments themselves, as viewed from certain trails, would be inconsistent with the lines, textures, and mosaics of a natural landscape (EA page 4-21).

Alternative 2 would have been incompatible with all long-term and short-term goals and guidelines for recreation within the project area and would exceed all guidelines and closures developed under the Trout Creek Recreation Project. (EA page 4-24)

Wildlife

As stated in the EA, page 1-4, one part of the purpose and need for this project is to “provide for wildlife habitat diversity.” Alternative 2 does not do this as well as Alternative 4. In particular, it would have the greatest impact on woodland caribou habitat. Treatments included almost 1,900 acres of *key habitat* across four Caribou Management Units, plus the potential for secondary burning on more than 700 acres of *key habitat*. It would also have converted thousands of acres of other seasonal habitats to unsuitable conditions. (EA page 4-33) Although none of the action alternatives would have reduced early winter cedar-hemlock habitat (EWCH), Alternative 2 would modify substantial percentages of all other seasonal habitats. As a result, it might have caused unfavorable changes to woodland caribou habitat. (EA page 4-41) It is important to note, however, that all of the action alternatives were determined as Not Likely to Adversely Affect woodland caribou (EA page A-2).

Alternative 2 would also have had more impact on Canada lynx by increasing unsuitable habitat by 277 acres, although the proportions of lynx habitat components would continue to meet the standards set forth in the Lynx Conservation Analysis and Strategy under all action alternatives. Alternative 4 does not cause any increase in unsuitable lynx habitat. (EA page 4-50) It is important to note, however, that all of the action alternatives were determined as Not Likely to Adversely Affect Canada lynx (EA page A-2).

Because this alternative included the largest number of treatment units, and had the greatest amount of maximum treatment acres, it had the potential for the most impact on grizzly bear habitat. Of course, treatments under all alternatives must be coordinated and scheduled to stay within road density, core habitat, and security guidelines. All alternatives included requirements that the combination of the whitebark pine activities and other activities would not be allowed to drop security below 70% in any affected bear management unit (EA page 4-52) It is important to note, however, that all of the action alternatives were determined as Not Likely to Adversely Affect grizzly bear (EA page A-2).

Alternative 2 Conclusion

For the reasons described above, Alternative 2 would not have met all of my decision criteria as well as Alternative 4 will. Alternative 2 did meet the portions of the purpose and need dealing with whitebark pine, protection against insect and disease damage, and the role of fire in the ecosystem. However, it did not respond as well to wildlife habitat diversity. It would have had the greatest impact on woodland caribou and Canada lynx habitats; although in the long term it would have decreased the risk of catastrophic fire, which would also reduce risk of habitat loss from a catastrophic fire event. By including prescribed burn treatments in Long Canyon, it did not do as much to respond to concerns about management in proposed wilderness (MA11) lands.

REASONS FOR NOT SELECTING ALTERNATIVE 3

Alternative 3 was developed in response to concerns about potential effects on woodland caribou habitat, recreation, and municipal watershed concerns. (EA page 2-15) In comparison to Alternative 2, it was refined as follows:

- Within currently suitable woodland caribou habitat, this alternative dropped a little more than 2300 acres of primary treatments and 830 acres of secondary treatments; thus, it has considerably less influence on seasonal caribou habitats (EA page 4-37).
- Impacts on Canada lynx were reduced (EA pages 4-48, 4-49), as were disturbance and security loss for grizzly bear (EA page 4-56).
- It also eliminated about 1459 acres of primary treatment and 436 acres of potential secondary treatment in the Myrtle Creek watershed. (EA page 2-15)

However, this alternative also presented other resource concerns, which made it less favorable overall than Alternative 4.

Recreation, Wilderness, and Visuals

Alternative 3 does not respond to the public concerns about active management within MA11 lands, particularly the Long Canyon drainage. It would have used prescribed fire without slashing, identified as “burning only” in the EA, on 165 acres within proposed wilderness (MA11). This use of prescribed fire is consistent with the Forest Plan, but some interpretations of the Wilderness Act leave it unclear whether or not such management adequately protects the possibility of future wilderness designation by Congress.

Alternative 3 would have treated 230 acres within proposed wilderness area MA11 (165 acres of primary treatment and 65 acres of potential secondary burn) and another approximately 620 acres of primitive land, (EA pages 4-24, 4-25). For the work activities under this alternative, it is reasonable that existing campsites and helispots would be adequate for work crews and any impacts would be short term (EA page 4-25). Within the Trout Creek Recreation Project area, the amount of work would have been on the high side of the Trout Creek guidelines, but not unacceptable (EA page 4-26.) The treatments themselves, as viewed from certain trails, would be inconsistent with the lines, textures, and mosaics of a natural landscape (EA page 4-26).

Alternative 3 would have been compatible with most goals and guidelines for recreation within the project area, although some short-term effect would be inconsistent with recreation guidelines. (EA page 4-27) However, it is less compatible with those goals and guidelines than my selected

alternative. It would have included treatments on about 50% more of the primitive lands than Alternative 4; 620 acres versus 408 acres, respectively.

Alternative 3 Conclusion

For the reasons described above, Alternative 3 would not have met all of my decision criteria as well as Alternative 4 will. Alternative 3 did meet the portions of the purpose and need dealing with whitebark pine, protection against insect and disease damage, the role of fire in the ecosystem and wildlife habitat diversity. Alternative 3 would have been consistent with Forest Plan direction and regulations. However, by including prescribed burn treatments in Long Canyon, it did not do as much to respond to public concerns about management in proposed wilderness (MA11) lands. In addition, it was less consistent with the goals and guidelines of the Trout Creek Recreation Project.

4. COMPLIANCE WITH THE NATIONAL FOREST MANAGEMENT ACT

FOREST PLAN CONSISTENCY

I have evaluated the alternatives and compared them to the Forest Plan standards, goals and objectives within the Whitebark Pine Restoration Project Area. I have determined that the selected alternative will meet the Forest Plan standards and will contribute to meeting the goals and objectives of the Management Areas within the Whitebark Pine Restoration project area. The selected alternative is consistent with Inland Native Fish Strategy standards and guidelines.

Detailed information is located in the EA on the following pages:

- Vegetation, pages 4-10 and 4-11
- Recreation and associated resources, page 4-28
- Wildlife, pages 4-41, 4-50, 4-51, 4-58, 4-61
- Water Resources and Aquatic Habitat, pages 4-72 and 4-73
- Inventoried Roadless Areas, pages 4-76, 4-77 and 4-79

SUITABILITY FOR TIMBER PRODUCTION

No timber harvest, other than salvage sales or sales to protect other multiple-use values, shall occur on lands not suitable for timber production. [16 U.S.C. 1604 (k)].

The selected alternative does not include timber harvest as a tool for whitebark pine restoration.

VEGETATIVE MANIPULATION

All proposals that involve vegetative manipulation of tree cover for any purpose must comply with the seven requirements found in 36 CFR 219.27(b). Management practices shall:

- 1. Be best suited to the goals stated in the Forest Plan*

Vegetative manipulation is the most effective method of meeting the Forest Plan objectives for these treatment areas (EA pages 1-3, 1-4, 1-6, and 4-1 to 4-11).

2. Assure that the technology and knowledge exists to adequately restock the land within five years after final harvest

Technology and professional knowledge were applied to assure that adequate stocking would occur within five years after final harvest (Chapter 4, pages 4-xx to 4-xx)

3. Not be chosen primarily because they will give the greatest dollar return or the greatest output of timber

Management practices were governed by ecosystem restoration objectives, specifically restoration of whitebark on its historic sites, not economics. A “Timber Harvest” alternative, which would produce the highest economic return, was eliminated from detailed study for the following reasons: a large percentage of the whitebark pine stands are in Management Areas not suitable or not designated for timber management; even in the locations where timber management is allowed, economic feasibility would be questionable. For these reasons, the timber harvest alternative was eliminated from detailed study. (EA pages 2-7 and 2-8)

4. Be chosen after considering potential effects to residual trees and adjacent stands

The first part of the Purpose and Need of this project is to, “Restore forest health and maintain whitebark pine in the ecosystem through manipulation of the composition and structure of designated stands,” EA page 1-1. That objective includes goals for residual trees and adjacent stands. Potential effects were a driving force in design of the alternatives. Objectives of the activities are described in the EA on pages 2-8 and 2-9. Effects are discussed in Chapter 4, pages 4-2 through 4-11

5. Be chosen after considering potential effects and conservation of soil and water resources

Features of the selected alternative described in this decision and the environmental assessment will ensure that soil, water, and watershed resources will be protected (EA, pages 2-26 to 2-27, and 4-62 through 4-73).

6. Be selected to provide the desired effects on water quality and quantity, wildlife and fish habitat, regeneration of desired tree species, forage production, recreational use, aesthetic values, and other resource yields

Compliance with Forest Plan Standards under the selected alternative will provide for the desired effects (EA pages as follows, Vegetation, pages 4-10 and 4-11; Recreation and associated resources, page 4-28; Wildlife, pages 4-41, 4-50, 4-51, 4-58, 4-61; Water Resources and Aquatic Habitat, pages 4-72 and 4-73; Inventoried Roadless Areas, pages 4-76, 4-77 and 4-79; and Appendix A)

7. Be practical in the terms of transportation and harvesting requirements and total costs of preparation, logging and administration

The selected alternative will not conduct any commercial harvest. The purpose and need is to restore whitebark pine and reintroduce the role of fire while providing for wildlife habitat diversity in a portion of the Selkirk Mountains. No funds will be generated into the U.S. Treasury; appropriated funds will be used. (EA page A-7)

In light of the serious precipitous decline of whitebark pine in the forests of northern Idaho, the project costs are practical and acceptable.

TRANSPORTATION FACILITIES

Any roads constructed through contracts, permits, or leases must be designed according to standards appropriate to the planned uses, considering safety, costs of transportation and the effects upon lands and resources. [36 CFR 219.27(a)(10)].

This project does not include road construction.

FINDINGS REQUIRED BY OTHER LAWS

Endangered Species Act – the selected alternative is consistent with Forest Plan direction to manage the habitat of species listed under the Endangered Species Act. (EA pages 4-41, 4-50, 4-51, 4-58; Appendix A pages A-3, A-4)

Clean Water Act – with the use of Best Management Practices (Appendix C) and mitigation measures outlined in Chapter 2 of the EA and Appendix B, the selected alternative would comply with the Clean Water Act and would not adversely affect beneficial uses (EA page 4-73).

Clean Air Act – the project meets the Clean Air Act through coordination with the North Idaho/Montana Airshed Group and use of prescribed burning techniques that minimize smoke emissions. Prescribed burning is consistent with state laws requiring treatment of activity fuels to reduce the risk of catastrophic wildfire. (EA Appendix A, page A-14)

National Historic Preservation Act - Cultural resource surveys have been completed as directed by the Cultural Resources Management Practices. One site could have potentially been impacted, but mitigation will be used to protect the site in accordance with the National Historic Preservation Act of 1966. (EA, Appendix A page A-7)

Environmental Justice Executive Order - The Kootenai Tribe of Idaho was consulted during project development. No cultural sites with importance to the tribe were identified within the treatment areas. There are no minority or low-income populations that could potentially be impacted by the implementation of the selected alternative. (EA page A-14)

Executive Order 12692 – the selected alternative is consistent with this order and will have no effect on westslope cutthroat trout, burbot, torrent sculpin, or interior redband trout that would lead toward a trend in federal listing. (EA page 4-73)

State of Idaho Governor’s Bull Trout Plan – The selected alternative is consistent with the direction in the Bull Trout Plan. (EA page 4-73)

Natural Resources Agenda – The selected alternative addresses three of the four key areas identified in the Agenda (sustainable forest ecosystem management, watershed health, and recreation). This project was designed to sustain the whitebark pine ecosystem and maintain the unique qualities it

provides to both the ecosystem and the recreation experience in the Selkirk Mountains. It also analyzed and considered potential affects to watershed health. (EA page 1-9)

Roadless Area Conservation Rule – As discussed in the Inventoried Roadless Area portion of the Rational for My Decision, on July 16, 2004, the U.S. Department of Agriculture published a Notice of Proposed Rulemaking in the Federal Register to replace the Roadless Area Conservation Rule (36 CFR part 294 (66 FR 3244)) adopted January 12, 2001 but subsequently permanently enjoined in Federal Court July 14, 2003. The Roadless Area Conservation Rule would be replaced with a petitioning process providing Governors an opportunity to seek establishment of management requirements for National Forest System inventoried roadless areas within their states. The Department also reinstated interim direction regarding Delegation of Authority and Interim Protection of Roadless Areas. The interim direction is being reinstated because of the continued legal uncertainty of implementing the Roadless Area Conservation Rule (36 CFR part 294).

Alternative 4 is compatible with direction on inventoried roadless areas.

Forest Service Road Management and Transportation System Rule – this project does not propose road construction and my selected alternative will be implemented almost entirely within an area that currently meets the definition for an inventoried roadless area. It is consistent with this rule.

5. FINDING OF NO SIGNIFICANT ACTION

The direct, indirect and cumulative effects of the proposed actions have been reviewed as documented in this Decision Notice, the Environmental Assessment, and the project file. The setting of these proposals is in a localized area, with implications only for landscapes, drainages and stands within the analysis area. Consideration of the proposed action is based on impacts to the ecosystem, local communities, county, and affected resources. The proposal does not have any large or lasting effects on the society as a whole, the nation, or the state.

Based on this review, it has been determined that there are no significant impacts on the physical, biological, or social portions of the human environment. Therefore, an Environmental Impact Statement will not be prepared. The selected alternative is consistent with management objectives, standards and guidelines established for the Whitebark Pine Restoration project area and the Idaho Panhandle National Forests.

SIGNIFICANT IMPACTS (BOTH BENEFICIAL AND ADVERSE)

Effects associated with the selected alternative are discussed in Chapters 2 and 4 of the Whitebark Pine Restoration EA. These impacts are within the range of those identified within the Forest Plan. The actions would not have significant effects on other resources identified and described within Appendix A and project files. Activities will result in some temporary and low impact effects. Precautionary signing and other public notices and announcements will provide for safety and information in areas of activities.

There will be direct beneficial impacts to whitebark pine, and both direct and indirect positive effects to other elements of the whitebark pine ecosystem, as well as species and processes within the ecosystem. The benefits are discussed in detail throughout this Decision Notice. In summary the following valuable results will be seen:

- Whitebark pine treatments will reduce competition from brush and other species (spruce and subalpine fir) and return whitebark pine to its historical dominance.
- Treated areas will create favorable seedbeds for natural regeneration by mature healthy, blister-rust resistant whitebark pine trees.
- The biology and diversity of these habitats will be trended toward historic conditions.
- At these high elevation ecosystems, only three tree species exist – spruce, subalpine fir and whitebark pine. Maintaining the whitebark pine will provide a buffer and greater natural resistance during outbreaks of disease or insects.
- Forest composition will trend toward historic conditions; fire regimes will not change as they would if composition continued to move toward more subalpine fir.
- Wildlife species and diversity will be maintained to the benefit of the following species: Clark’s nutcracker (food source), numerous species of migratory birds (habitat), squirrel populations (food source), Canada lynx and fisher (squirrels as a portion of their prey base), grizzly bear (food source).
- Whitebark pine will continue to fill its role in these harsh high elevation environments, including favorable effects on snow interception, snowmelt and water yield.

No significant increase in water yields or sedimentation in the analysis area streams is expected, and state water quality guidelines will be met. Implementation of Inland Fish Strategy standards and guidelines will protect stream courses from sedimentation (EA, pages 2-25 through 2-28, 4-62 to 4-73; Appendix A, pages A-15 to A-17).

It is my determination that the selected alternative will have no significant effects on public health and safety or on any resource attributes of the Whitebark Pine Restoration project area.

UNIQUE CHARACTERISTICS OF THE GEOGRAPHICAL AREA, SUCH AS PROXIMITY TO HISTORIC OR CULTURAL RESOURCES, PARKLANDS, PRIME FARMS, WETLANDS, WILD AND SCENIC RIVERS, OR ECOLOGICALLY CRITICAL AREAS

Currently, there are no known districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places that would be affected by the selected alternative. As such, the actions should not cause the loss or destruction of significant scientific, cultural, or historic resources (EA, page 2-25, Appendix A, page A-7).

There would no change in the character of old growth stands and the function and distribution of old growth would not be affected. (EA, page A-5).

No unique parklands, prime farms, or wetlands are located in the treatment areas. Long Canyon Creek is a candidate for Wild and Scenic River designation under the Wild and Scenic Rivers Act of 1968; however, the selected alternative does not include treatments in that drainage.

THE DEGREE TO WHICH THE EFFECTS ON THE QUALITY OF THE HUMAN ENVIRONMENT ARE LIKELY TO BE HIGHLY CONTROVERSIAL

The effects of these activities on the quality of the human environment are not highly controversial (EA, pages 2-1 to 2-8; Appendix A, pages A-7 to A-14). Past monitoring has determined that the actual effects of similar treatment methods are consistent with estimated effects of the proposed activities. There is a wide professional and scientific agreement on the scope and effects of these actions on the various resources.

THE DEGREE TO WHICH THE POSSIBLE EFFECTS ON THE HUMAN ENVIRONMENT ARE HIGHLY UNCERTAIN OR INVOLVE UNIQUE OR UNKNOWN RISK:

The planned actions are similar to actions implemented in other areas on the National Forest system, state, county and private lands. Effects will be similar to those of past actions. The analysis considered the effects of past actions as a frame of reference in conjunction to the estimated effects of the proposal. It is my conclusion that there are no unique or unusual characteristics of the area, which have not been previously encountered, which would constitute an unknown risk to the human environment (EA, pages 2-24 to 2-25; 4-1 through 4-79, A-1 to A-14).

THE DEGREE TO WHICH THE ACTION MAY ESTABLISH A PRECEDENT FOR FUTURE ACTIONS WITH SIGNIFICANT EFFECTS OR PRESENTS A DECISION IN PRINCIPLE ABOUT FUTURE CONSIDERATIONS

The selected alternative is not setting a precedent for future actions of significant effects (EA page 1-8). Management practices are consistent with the Forest Plan and the capabilities of the land. This action does not represent a decision in principle about future considerations. Any future proposals for this area will be subject to NEPA requirements and require a new decision.

WHETHER THE ACTION IS RELATED TO OTHER ACTIONS WITH INDIVIDUAL INSIGNIFICANT BUT CUMULATIVE SIGNIFICANT IMPACTS

The combined effects of past, other, and reasonably foreseeable actions are discussed in the EA. There is no indication of significant adverse cumulative effect to the environment (EA, Chapters 3 and 4 and Appendices A and B).

THE DEGREE TO WHICH THE ACTION MAY ADVERSELY AFFECT DISTRICTS, SITES, HIGHWAY STRUCTURES, OR OBJECTS LISTED IN OR ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES, OR MAY CAUSE LOSS OR DESTRUCTION OF SIGNIFICANT SCIENTIFIC, CULTURAL, OR HISTORIC RESOURCES

Currently, there are no known districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places that would be affected by the selected alternative. As such, the actions should not cause the loss or destruction of significant scientific, cultural, or historic resources (EA, page A-7).

THE DEGREE TO WHICH THE ACTION MAY ADVERSELY AFFECT AN ENDANGERED OR THREATENED SPECIES OR ITS HABITAT THAT HAS BEEN DETERMINED TO BE CRITICAL UNDER THE ENDANGERED SPECIES ACT OF 1973

It was determined that the proposed actions would not likely adversely affect any Threatened, Endangered or candidate wildlife, fish, or plant species which may occur in the area (EA, pages A-2 to A-4, B-1 through B-10; B-15, B-16, B-18, B-19).

WHETHER THE PROPOSED ACTION THREATENS A VIOLATION OF FEDERAL, STATE, OR LOCAL LAW OR REQUIREMENTS IMPOSED FOR THE PROTECTION OF THE ENVIRONMENT

The proposal meets federal, state and local laws; as follows:

- ☛ Air Quality (EA, pages A-8 through A-14),
- ☛ Water quality (EA pages 2-27, 4-62 to 4-73; Appendices B and C),
- ☛ Streamside management and riparian areas (EA, pages 2-27, 4-65 to 4-38; Appendices B and C),

- ¶ Cultural resources (EA, pages 2-25, A-12 to A-13),
- ¶ Threatened and Endangered species (EA, pages 2-27, 4-31 through 5-58, A-1 through A-3, B-1 through B-14 through B-18), and
- ¶ National Environmental Policy Act disclosure requirements.

The Purpose of NEPA (1500.1(b)) states that *procedures must insure that environmental information is available to public officials and citizens before decisions are made and actions are taken.*

This project was initiated through public scoping in June 2000, which provided information and requested comments from interested individuals, public agencies, the Kootenai Tribe of Idaho, and various environmental groups. This project first appeared on the Quarterly Schedule of Proposed Actions in November 2000. The EA was mailed to the public in late May, 2004 and the 30-day comment period commenced on June 1, 2004. Six letters of comment were received, including one individual from the local community, the Idaho Department of Fish and Game, the Idaho Native Plant Society, and three regional environmental groups (project file comment letters 01 through 06). The substantive comments from the letters and the responses are contained in the appendix to the Decision Notice.

The Purpose of NEPA (1500.1(c)) states that *the NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment.*

As demonstrated throughout this Decision Notice, the Response to Comments, and the Environmental Assessment, the interdisciplinary team utilized internal and public scoping to determine the issues and natural resources that could have been affected by the proposed management activities. Both beneficial and negative consequences of a range of alternatives were analyzed and disclosed. My selection of Alternative 4 is a reasoned choice that will protect, restore, and enhance the environment.

6. Documents and Project Files

Project files contain the detailed information, data used and decisions made in selecting Alternative 4 for implementation. The Environmental Assessment, Decision Notice and Finding of no Significant Impact are available for inspection during regular business hours at:

Bonnors Ferry Ranger District
6286 Main St.
Bonnors Ferry, Idaho

7. Appeal Rights

This decision is subject to appeal pursuant to 36 CFR 215.11. A written appeal must be submitted within 45 days following the publication date of the legal notice of this decision in the *Spokesman Review*, Spokane, Washington. It is the responsibility of the appellant to ensure their appeal is received in a timely manner. The publication date of the legal notice of the decision in the newspaper of record is the *exclusive* means for calculating the time to file an appeal. Appellants should not rely on date or timeframe information provided by any other source.

Paper appeals must be submitted to:

USDA Forest Service, Northern Region
ATTN: Appeal Deciding Officer
P.O. Box 7669
Missoula, MT 59807

Or, if hand delivered, during office hours 7:30 a.m. to 4:00 p.m.:

USDA Forest Service, Northern Region
ATTN: Appeal Deciding Officer
200 East Broadway
Missoula, MT 59802

Electronic appeals must be submitted to:

appeals-northern-regional-office@fs.fed.us

In electronic appeals, the subject line should contain the name of the project being appealed. An automated response will confirm your electronic appeal has been received. Electronic appeals must be submitted in MS Word, Word Perfect, or Rich Text Format (RTF).

It is the appellant's responsibility to provide sufficient project- or activity-specific evidence and rationale, focusing on the decision, to show why my decision should be reversed. The appeal must be filed with the Appeal Deciding Officer in writing. At a minimum, the appeal must meet the content requirements of 36 CFR 215.14, and include the following information:

- The appellant's name and address, with a telephone number, if available;
- A signature, or other verification of authorship upon request (for electronic mail, a scanned signature may be filed with the appeal);
- When multiple names are listed on an appeal, identification of the lead appellant and verification of the identity of the lead appellant upon request;
- The name of the project or activity for which the decision was made, the name and title of the Responsible Official, and the date of the decision;
- The regulation under which the appeal is being filed, when there is an option to appeal under either 36 CFR 215 or 36 CFR 251, subpart C;
- Any specific change(s) in the decision that the appellant seeks and rationale for those changes;
- Any portion(s) of the decision with which the appellant disagrees, and explanation for the disagreement;
- Why the appellant believes the Responsible Official's decision failed to consider the substantive comments; and
- How the appellant believes the decision specifically violates law, regulation, or policy.

8. NONDISCRIMINATION POLICY

The policy of the United States Department of Agriculture Forest Service prohibits discrimination on the basis of race, color, national origin, age, religion, sex, disability, familial status, or political affiliation. Persons believing they have been discriminated against in any Forest Service related activity should write to:

Chief, Forest Service, USDA,
P.O. Box 96090, Washington, DC
20090-6090

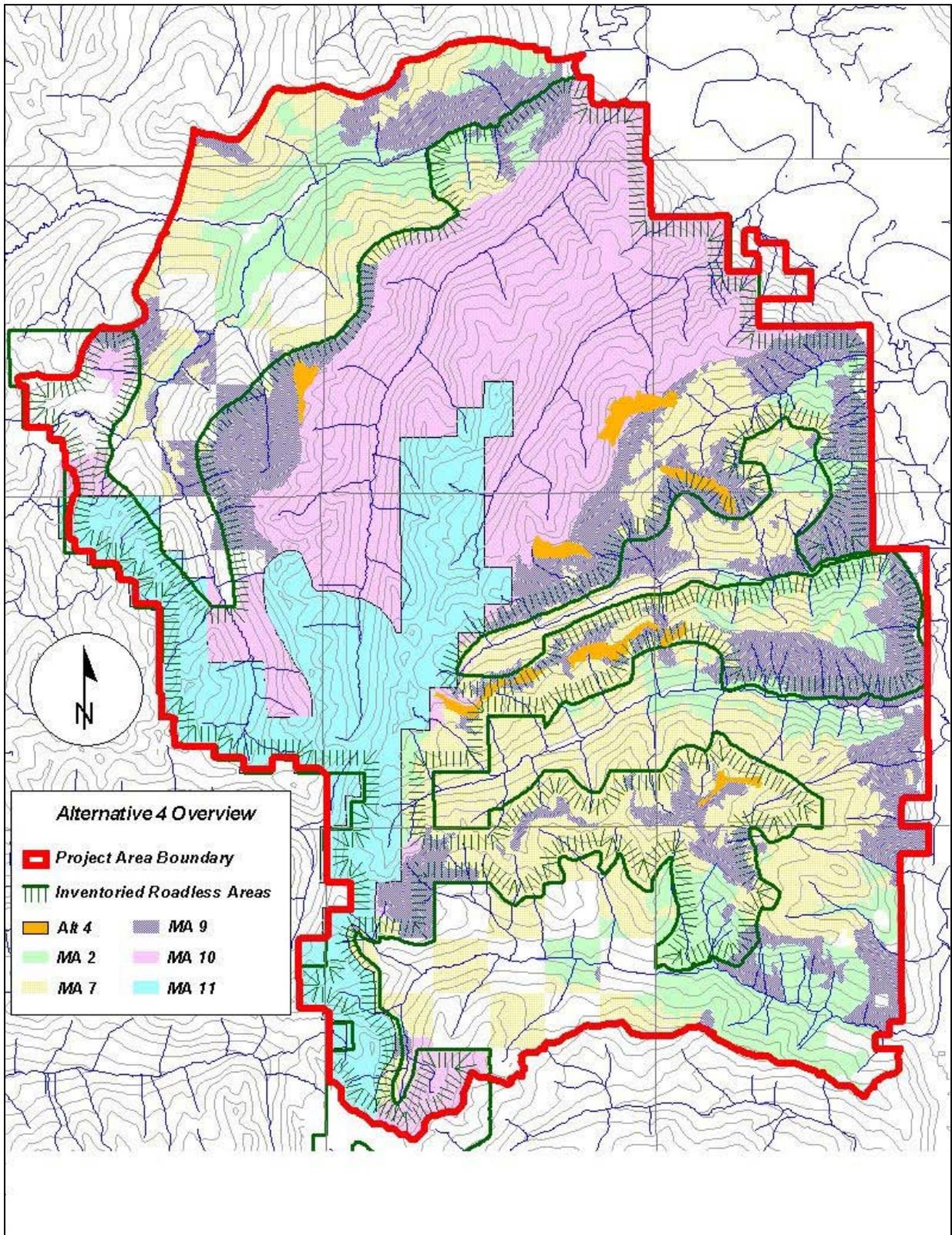
9 IMPLEMENTATION OF MY DECISION

If no appeal is received within the 45-day time period, implementation of this decision may begin on, but not before, the 5th business day following the close of the appeal-filing period. If an appeal is filed, implementation may occur, on but not before, the 15th business day following the date of appeal disposition. In the event of multiple appeals of the same decision, the implementation date is controlled by the date of the last appeal disposition.

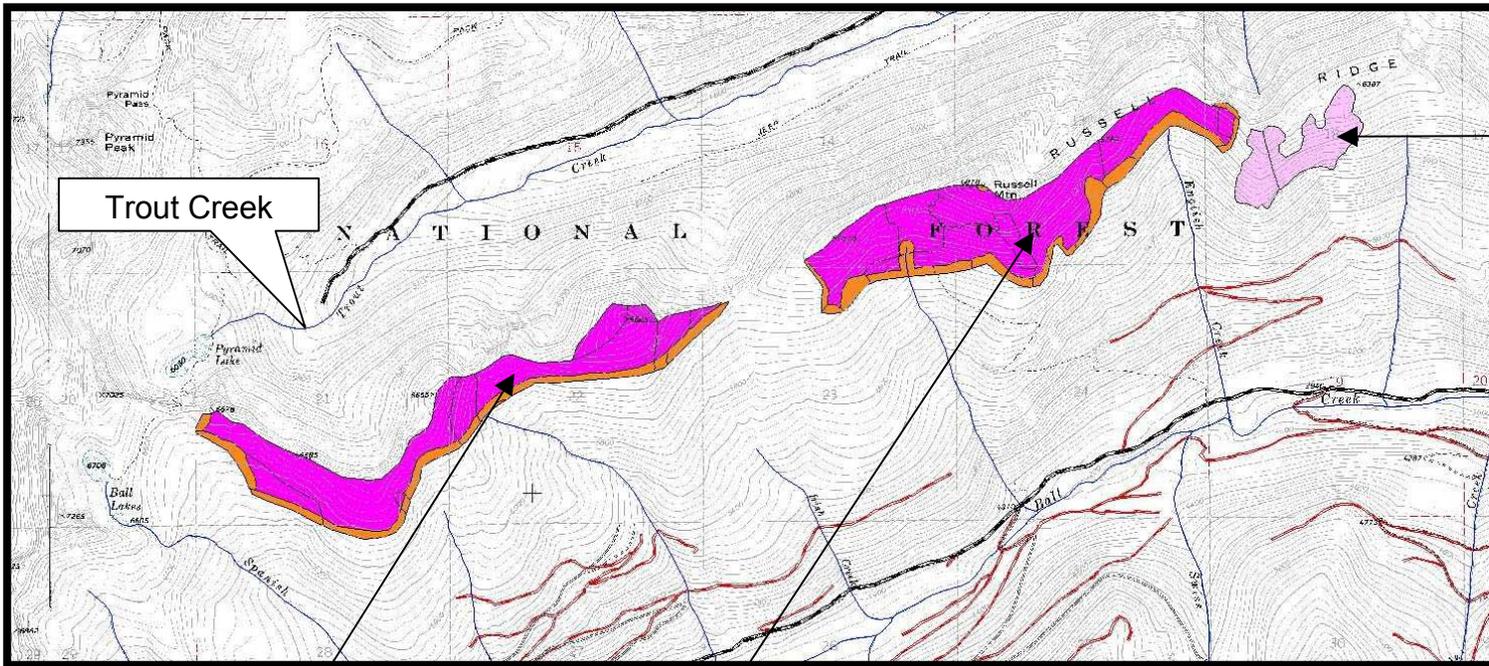
Deciding Official: Ranotta McNaair Forest Supervisor 7/26/04
RANOTTA MCNAIR Title Date

FOR FURTHER INFORMATION, CONTACT:

Maridel Merritt, Project Leader
Bonners Ferry Ranger Station
6286 Main St.
Bonners Ferry, Idaho 83805
(208) 267-5561



My Selected Alternative
 Overview of Alternative 4 Treatment Areas



Russell Ridge

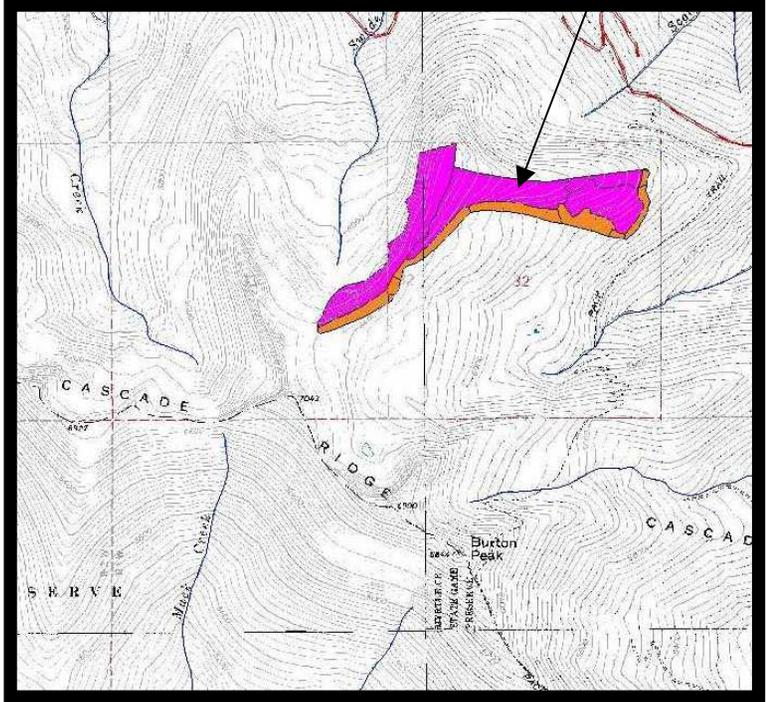
Burton Ridge

Ball Lakes

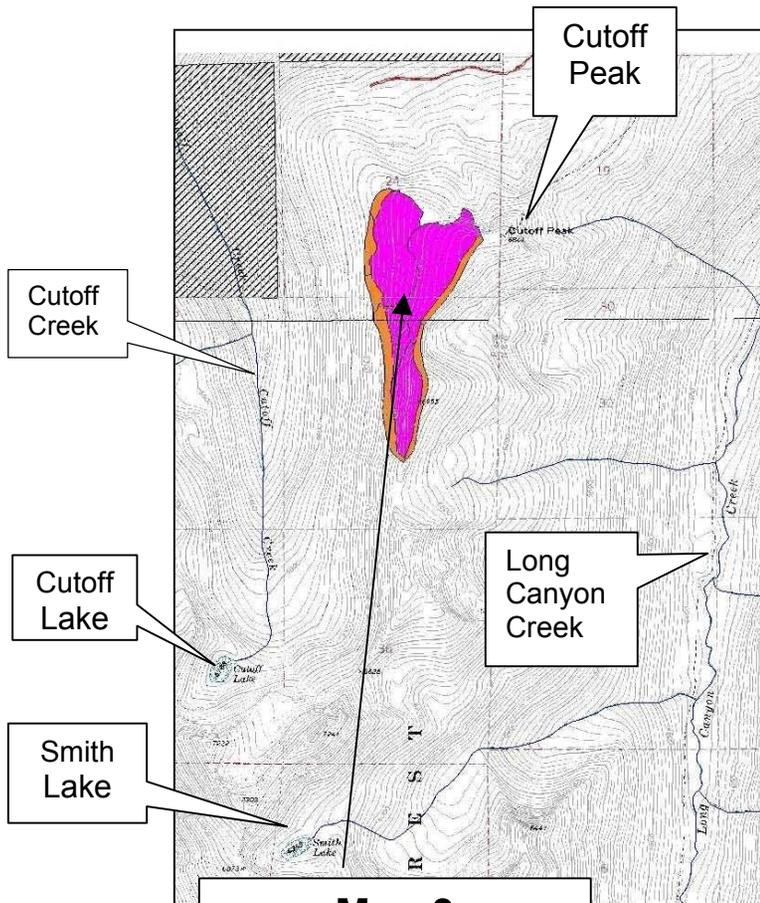
Russell Peak

**Maps 1 and 2
Ball Lakes, Russell Ridge
and Burton Ridge
Treatment Areas**

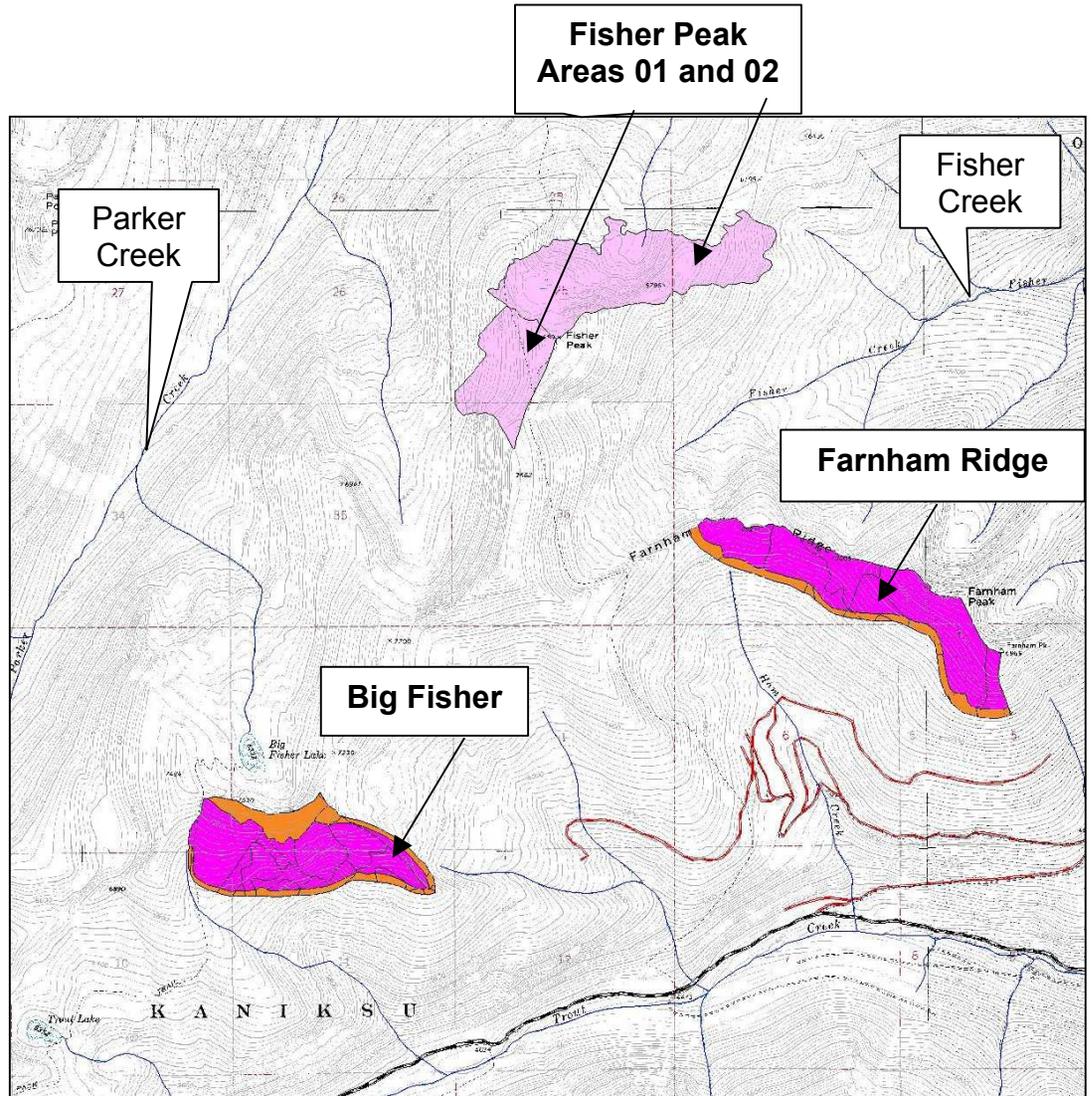
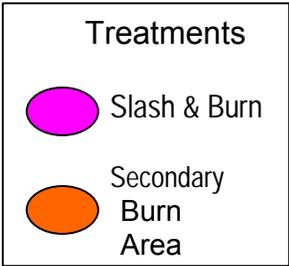
- Treatments
- Slash & Burn
 - Secondary Burn Area



Alternative 4 Treatment Areas



**Map 3
Cutoff Peak
Treatment Area**



**Map 4
Farnham & Fisher
Treatment Areas**

Errata Sheet
Whitebark Pine Restoration EA

EA Page 2-28

H. Recreation

- 1) Slashing shall use the following guidelines....
.... maintaining a minimum 200-foot buffer for focal points

EA Page 4-7

Table 4-3 Long Canyon Creek information should be clarified as follows:

Long Canyon & Cutoff Peak:

Alternative 2 equals approximately 445 acres of treatment

Alternative 3 equals approximately 356 acres of treatment

Cutoff Peak Only:

**Alternative 4 equals approximately 143 acres of treatment
(Alternative 4 has no treatments in Long Canyon)**

**Response to Comments
Whitebark Pine Restoration EA**

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Letter 01 – Michell Behrens

Comments concerning alternatives or alternative selection

A-01 Comment: I have recently reviewed the Whitebark Pine Restoration EA and strongly agree with the purpose and need of the project. For such a devastating problem, I feel that Alternative 2 is the only appropriate alternative to implement.

Response: Thank you for your support of this project. By treating the greatest acreage of the whitebark pine ecosystem (about 7266 acres), Alternative 2 would do the most to respond to the vegetation concerns and to reintroduce the role of fire within the project area. Alternative 3 would treat just over 2060 acres and Alternative 4 about 1730 acres. However, Alternative 2 does not respond to the goal for wildlife habitat diversity, or recreation concerns, to the extent that Alternative 4, my preferred alternative, does. Alternative 4 does not treat all stands that would benefit from active management, but does meet a substantial portion of the purpose and need while balancing concerns for other resources.

Alternative 4 is a conservative approach in this initial effort to maintain the whitebark pine within the Selkirk Mountains. As the project is implemented and we learn more about maintaining whitebark pine ecosystems, we can assess the probable effectiveness of treating additional areas. As identified in the EA, there are extensive whitebark pine restoration needs in the Selkirk Mountains. The selected alternative is expected to be an important part of this restoration process. District personnel will be able to refine what is learned from this project and apply it to future whitebark pine restoration efforts, when or if they are proposed.

The preferred alternative allows us to begin treatments that will start the trend toward restoring forest health and maintaining the whitebark pine ecosystem, reintroducing fire, and providing diverse wildlife habitat. Under Alternative 4, over 1000 acres will be treated by slashing competing vegetation and then using prescribed burning to prepare the area for natural planting by Clark's nutcracker or artificial planting of nursery grown whitebark pine seedlings. Close to 400 acres of whitebark pine release cutting will reduce competition from other tree species and brush. Alternative 4 includes 1323 acres of stands with high potential natural regeneration. (See EA page 4-6 for detailed treatment information.)

Caribou habitat considerations: Alternative 2 would treat about 2967 acres of currently suitable caribou habitat in primary burn areas, and as much as 1,014 acres of secondary burn; of this, about 2,600 acres is considered *key habitat*. It would modify substantial percentages of all other seasonal habitats and may cause unfavorable changes to woodland caribou habitat. However, this alternative has been determined as Not Likely to Adversely Affect woodland caribou (EA page A-2). In addition, in areas where treatments occur, the long-term risk of catastrophic fire will be reduced, bringing with it a reduced risk of loss of caribou habitat in the event of a catastrophic fire (EA page 4-33).

Alternative 4 would treat the fewest acres of currently suitable caribou habitat and is unlikely to cause substantial effects to woodland caribou. It treats about 466 acres in primary burn areas with the potential for about 146 acres in secondary burn areas; of this, about 312 acres is considered *key habitat*. Alternative 4 would have considerably less influence on caribou habitat by concentrating activities during late summer and fall in open-canopied stands that mainly serve as late winter or spring/calving habitat. In addition, the treatments are on high windswept ridges that don't produce significant quantities of forage. The work will be done during the season when caribou are not expected to be utilizing the areas. Therefore, Alternative 4 is unlikely to cause substantial effects to woodland caribou (EA, page 4-41.) It has also been determined as Not Likely to Adversely Affect woodland caribou (EA page A-2). In addition, in areas where treatments occur, the long-term risk of catastrophic fire will be reduced, bringing with it a reduced risk of loss of caribou habitat in the event of a catastrophic fire (EA page 4-33).

Canada lynx habitat considerations: Alternative 4 would not increase the amount of unsuitable habitat; Alternative 2 would have added 277 acres of unsuitable habitat and have considerably more impact on denning habitat (EA, page 4-50). All of the action alternatives were found to be Not Likely to Adversely Affect Canada lynx (EA page A-2). In addition, in areas where treatments occur, the long-term risk of catastrophic fire will be reduced, bringing with it a reduced risk of loss of components of Canada lynx habitat. A large stand-replacing fire would convert all affected stands to unsuitable habitat that would take 20 to 30 years to then

support high densities of snowshoe hare. (EA page 4-42)

Grizzly bear habitat considerations: Alternative 4 would treat fewer acres than Alternative 2 and subsequently would cause less disturbance and fewer acres of security loss (EA page 4-56). A notable difference is that Alternative 4 splits the Fisher-Farnham treatment area into two much smaller treatment areas: Big Fisher and Farnham Ridge as shown in Figure 4-8. Both alternatives were found to be Not Likely to Adversely Affect grizzly bear (EA page A-2)

Recreation considerations: Implementation of Alternative 2 would be incompatible with long-term (more than 3 years) and short-term goals and guidelines for recreation and would exceed guidelines and closures developed in the Trout Creek Recreation Project (EA page 4-24). Alternative 4 is the most compatible with both short- and long-term goals and guidelines within the project area. The concerns of potential effects on MA11, proposed wilderness areas, are eliminated by the design of Alternative 4.

Watershed considerations: None of the alternatives are predicted to have any direct, indirect or cumulative effects that would degrade watershed resources. Alternative 4 will treat fewer acres on sensitive landtypes and does not include any treatment within the Myrtle Creek watershed, which is the municipal water supply for the City of Bonners Ferry.

The implementation and results of the treatments under Alternative 4 will be evaluated for effectiveness in reaching the objectives. The results of that monitoring will also be reviewed in light of the IPNFs Forest Plan Revision efforts and future land allocations. A successful outcome could lead to proposals for additional treatments. At that time, the public would be involved and consultation would take place with the U.S. Fish and Wildlife Service

Comments concerning wildlife or biodiversity

W-01 Comment: Scientists are nearly unanimous in their assessment that whitebark pine ecosystems require immediate restoration and the importance of whitebark pine communities is indisputable. Over 50 documented species of birds and mammals use these ecosystems; 20 of them using whitebark pine seeds as a food source. Losing this key habitat will result in negative consequences for a number of species as well as a significant reduction in biodiversity at high elevations.

Response: As stated on page 4-2 and 4-3 of the EA (Alternative 1 – No Action), without active management the subalpine zone forests will lose ecological and structural diversity. Stands will be more vulnerable to large, severe stand-replacing wildfires as well as insect and disease epidemics. A “leave-alone policy would continue this species down the path of functional extinction over more and more of its range”.

If no action were taken, the loss of whitebark pine would be a permanent loss in foraging habitat for grizzly bear. If whitebark pine disappeared from the local landscape, carrying capacity for grizzly bears may be reduced due to forage limitations. (EA, page 4-52)

W-02 Comment: Some may argue that whitebark pine is going extinct anyway so why bother. Can you imagine using that same argument about woodland caribou, grizzly bears, or Canada lynx? As a forest manager, allowing habitats or species to become extinct is not an option.

Response: As explained on pages 1-1 through 1-4 of the EA, the purpose and need for this project recognizes the impacts on the whitebark pine species and ecosystem that have been brought about by white pine blister rust, outbreaks of mountain pine beetle, and fire exclusion.

The reasons this project was proposed are as follows:

- 1) Restoring forest health and maintaining whitebark pine in the ecosystem,
- 2) Reintroducing the role of fire in the ecosystem, and
- 3) Providing for wildlife habitat diversity.

Because of the dependence of many animal species on whitebark pine as a food source, it is considered a keystone species of the subalpine forests. This species is also valued for the visual quality it adds to high elevation

remote areas, and for its role in watershed protection by delaying snowmelt and retaining snowdrifts until early to mid-summer (D. Perkins, 2002; project file).

During development of the proposal and alternatives, the project interdisciplinary team discussed the question, “What would happen if the whitebark pine were lost in the Selkirk Mountains?” They concluded there would be the following consequences (project file IDT notes 5/18/00):

- The biology and diversity of these habitats would be lost.
- At these high elevation ecosystems, only three tree species exist – spruce, subalpine fir and whitebark pine. Losing one species could be critical, especially if disease or insects seriously impacted the spruce or subalpine fir.
- Fire regimes would change as the forest composition moves to more subalpine fir. The risk of catastrophic fire would increase, bringing with it an increased risk for loss of habitat for caribou (EA page 4-33) and lynx (EA, page 4-42).
- Wildlife species and diversity would be impacted. Effects would be both direct and indirect as follows: Clark’s nutcracker (by loss of food source), numerous species of migratory birds (by loss of habitat), squirrel populations (loss of food source), Canada lynx and fisher (loss of squirrels as a portion of their prey base), grizzly bear (loss of food source).
- Changes in the tree cover would have direct effects in these harsh high elevation environments; including effects on snow interception, snowmelt and water yield.

Comments concerning whitebark pine

***WBP-01 Comment:** Most treatments in Alternative 2 are in the Selkirk Roadless Area; areas that have the highest potential to naturally regenerate substantial amounts of whitebark pine. In Alternative 3 or 4, thousands of acres of potential whitebark pine regeneration will be left out. In areas not treated, white pine blister rust will continue to infect older trees and regeneration, resulting in few to no whitebark pine seedlings. This would cause a serious loss of genetic variability. Fire suppression will likely continue causing loss of natural regeneration due to successional stand changes towards more shade-tolerant, fire-susceptible tree species. Without active management in all identified treatment areas, whitebark pine will continue its march toward extinction across much of its historic range.*

Response: All of the action alternatives would trend the treated stands toward a long-term increase in whitebark pine populations. Although Alternative 2 would convert considerably more acres than either Alternative 3 or 4, each of these alternatives provides much greater opportunity for restoration of whitebark pine than Alternative 1 No Action (EA page 4-6).

The response to comment A-01, above, explains the considerations and tradeoffs at this time between the various resources within the project area. Future needs for additional active management in whitebark pine ecosystems can be assessed with full public participation and review and consultation by the US Fish & Wildlife Service.

As explained on page 2-7 of the EA, the interdisciplinary team did consider an alternative that would not enter any portion of the Selkirk Inventoried Roadless Area. However, this reduced the areas that could be treated to only about 500 acres, about one-tenth of the portion of the ecosystem in the Proposed Action (Alternative 2) or less than one-third of the area that will be treated under Alternative 4. Excluding the Selkirk Roadless Area would not meet the Purpose and Need for this project.

Chapter 4 of the EA discusses the probable environmental consequences of implementing the alternatives. The results of not taking an active management role are discussed on pages 4-2 and 4-3. Several references are made to scientific research and conclusions that Alternative 1 (No Action) would result in the loss of ecological and structural diversity and whitebark pine would become functionally extinct over more and more of its range.

Alternatives 2, 3, and 4 use two basic types of treatments – a combination of slashing and prescribed burning, or whitebark pine release. Certain areas in Alternatives 2 and 3 would also be treated by prescribed burning without any slashing, as described on pages 4-3 through 4-5. Alternative 2 would provide the greatest potential for whitebark pine regeneration and sapling release by treating a total of almost 7,300 acres (including slightly over

3,700 acres with high potential for regeneration.) Alternative 3 would treat just over 2,000 acres (including a little more than 1,300 acres with high potential for regeneration.) Alternative 4 would treat just over 1,700 acres (including a little more than 1,300 acres with high potential for regeneration.)

Comments concerning recreation

R-01 Comment: It seemed that the only forest use that may have problems in the implementation of any alternative was recreation; however, after reviewing the EA, I find that any recreational objectives are completely subjective. Project work is scheduled for the low use period following Labor Day and the amount of work and need for low-impact primitive camps in the backcountry is within the precedent already set by reconstruction of Trail #7 and other trail projects over the past 20 years. The project will create short-term visitor inconveniences, but in the long-term will provide positive returns in regards to enhanced forest habitat and species diversity for the recreational visitor's enjoyment.

Response: As explained on page 2-15 of the EA, Alternative 3 was designed in part to respond to Recreation concerns. This alternative did not include the 350-acre whitebark pine weed and release treatment that would have encompassed Trout Lake, Trail #41 and portions of Trail #27, and the treatments within Myrtle Creek watershed that had potential to impact Trails #286 and #9. Chapter 2 Required Design Criteria "H. Recreation" explains criteria for whitebark pine treatments, crew camps, and timing of activities. Each of the criteria is estimated to be highly effective (EA page 2-28.)

Potential effects that would occur under any of the action alternatives (Alternative 2, 3 or 4) are explained in Chapter 4 beginning on page 4-14, summarized as follows:

No currently active recreation special use permits would be affected.

All work would be compatible with the Memo of Understanding between the Idaho Dept of Lands and the Forest Service.

Historic cabins would be protected.

Roads and roadside recreation would be affected only by the fact that management activities might be visible from a distance.

Most treatment areas would be accessed by helicopter, some by use of existing trails.

The dispersed camping at Baker's Camp could be impacted, but other sites along Smith Creek Road could accommodate visitors.

ROS social settings would change during project work, but would return to their current state at the end of management activities. ROS Physical settings would vary by alternative.

Winter recreational experiences would not be changed.

Visual impacts would lessen as burned areas green up within the first year; impacts on the background and middle ground would also decrease over time. From a distance, all alternatives are consistent with scenery management direction. Visual sensitivity in the foreground would vary depending on the visitor and the area that was treated.

Impacts to trails vary; detailed information is included on pages 4-16 through 4-28 of the EA.

Potential impacts from crew camps will be minimized by the camping guidelines shown on page 2-28 of the EA.

Alternative 2 would have affected the physical remoteness of primitive lands. Campsites identified under the Trout Creek Recreation Project would not be adequate to serve as base camps for the work crews needed to accomplish the amount of treatments in this alternative. Development of new campsites and social trails would have long term impacts. It is likely that additional helispots would be required; clearings for helispots could be a permanent change to the landscape. (EA page 4-17)

Due to the extent of the treatments, the project work would create more social impact than is consistent with the Trout Creek Recreation Decision (EA page 4-18). Alternative 2 would also have more visual impacts from trails than Alternative 4 (EA pages 4-20 through 4-28); and would be inconsistent with the sense of remoteness or solitude within the area of the Trout Creek Recreation Project.

R-02 Comment: To choose an alternative based solely on recreational use would ignore scientific research and conclusions; and thus be based completely on the social wants of man (the most adaptable species on earth).

Response: As explained on pages 1-1 through 1-4 of the EA, the purpose and need for this project recognizes the impacts on the whitebark pine species and ecosystem that have been brought about by white pine blister rust, outbreaks of mountain pine beetle, and fire exclusion. The goals for this project include: 1) restoring forest health and maintaining whitebark pine in the ecosystem, 2) reintroducing the role of fire in the ecosystem, and 3) providing for wildlife habitat diversity. As described in response A-01 above, my preferred alternative substantially accomplishes the elements of the purpose and need for action, while better balancing the vegetation, wildlife, recreation, and water quality concerns and needs identified through public involvement.

The preferred alternative is one step in the restoration process for whitebark pine in the Selkirks. As identified in the EA, there are extensive whitebark pine restoration in the Selkirk Mountains and other places in northern Idaho. The preferred alternative is expected to be an important part of this restoration process. District personnel will be able to refine what is learned from this project and apply it to future whitebark pine restoration efforts, when or if they are proposed.

R-03 Comment: There are concerns in some recreation circles that the “sense of remoteness” will be lost during the work project timeframe. However, work will be done after Labor Day, measures will be used to lessen visual impacts, and recreational social settings will revert to their original classifications. Based on numbers in the Appendix D ROS chart, the likelihood of encountering a work crew or accompanying noise and visual effects is extremely low, especially during the time of year the work will be performed.

Response: This project includes requirements as follows:

- For the slashing treatments, in recognition of potential visual impacts;
- For crew camps, to minimize potential for lasting effects;
- For timing of project activities, to reduce potential disturbance to visitors in the area.

Estimated effectiveness is generally high. Since the work will be conducted either by the Bonners Ferry Ranger District, or through a contract administered by district personnel, the specifications for the work will be followed (EA page 2-28).

The analysis for the project considered the “sense of remoteness” both within and outside the Trout Creek Project area.

Inside the Trout Creek Project area

Under Alternatives 2, 3 and 4, the presence of work crews and sights/sounds of helicopters and chainsaws would disturb the sense of remoteness during the work; then this part of the sense of remoteness would return to acceptable standards. Alternative 2 is incompatible with goals and guidelines for recreation within the Trout Creek Project area and for many users would change the sense of place for the long term (EA page 4-24). Alternatives 3 and 4 are compatible with most of the Trout Creek Project goals and guidelines; but some of the short-term effects would be inconsistent. Because whitebark pine trees are an integral part of the high elevation environments, as well as an important component of high elevation recreation, maintaining the rapidly declining whitebark pine populations through implementation of Alternatives 3 or 4 justifies short-term deviations from the Trout Creek guidelines. (EA pages 4-27 and 4-28)

Outside the Trout Creek Project area

Under Alternatives 2, 3 and 4, the presence of work crews and sights/sounds of helicopters and chainsaws would disturb the sense of remoteness during the work; then the sense of remoteness would return to its pre-project condition.

The response to comment R-01 contains more information about the specific requirements and effects of this project (EA pages 4-14 through 4-16).

R-04 Comment: The EA states as an important note, that whitebark pine is a fundamental visual component of the wild Selkirks. Alternatives 3 and 4 leave much of the whitebark pine untreated and over time even the picturesque snags would be a thing of memory. This would cause a loss in the “untamed sense of place” in the Selkirks.

Response:

This project does recognize the importance and unique value of whitebark pine as one of the elements of the

Selkirk Mountains “untamed sense of place.” Much of the existing whitebark pine is located in and around popular recreation areas, including high elevation lakes and connecting trail systems in Ball Creek, Trout Creek, Long Canyon Creek, Fisher Creek and Smith Creek drainages. (See Response R-03 also.)

The whitebark pine ecosystems occur in the higher elevation cold-dry forests near timberline. They are characterized by harsher, more restrictive growing environments. By the nature of the rocky soils, open stands of vegetation, and short growing seasons, whitebark pine communities are susceptible to impact. The range of alternatives, their design criteria and mitigation measures balance the need to take action before the Selkirks lose the whitebark pine with the needs of wildlife, recreation, and “untamed sense of place.”

R-05 Comment: There are concerns over the work crew camping in the backcountry. As stated in the EA, requirements are in place to minimize impacts and to rehabilitate work crew camping sites. A precedent for this type of work has already been set by the reconstruction of Trail #7. During that project, trail crews camped for 8 to 10 days, two to three times a year, for a period of three years. The crews used power tools and helicopters in the proposed wilderness, and camped in primitive, low-impact campsites. Over the last 20 years, a number of trail construction projects of 7-10 day periods occurred and the crews camped in the backcountry with no negative impacts. How is this any different that what is being proposed in any of the alternatives?

Response: The definition for long-term impact was based on historical activities such as trail construction or wildfire suppression. The long-term impacts are defined as, “those that exceed repeated short-term entry for more than three consecutive years” (EA page 4-15). Under this definition, the reconstruction of Trail #7 was considered short-term. The activities proposed under the Whitebark Pine Restoration project, could require more than three years to be fully implemented (EA page 4-15). Appendix C, Crew Production Estimates, displays the estimates for each treatment area. Depending on the type of treatment and the size of the area involved, estimates of crew time range from 2 to 4 days at Burton Peak, to 27 to 55 days for Fisher-Farnham. However, treatments will most likely occur over several years. If implementation of either Alternative 3 or 4 takes three years to complete, approximately 10 to 18 crew days would be needed each year to complete slashing and fuel preparation work prior to subscribed burning.

R-06 Comment: There are concerns that the project may exceed the recreational visitor day guidelines stated by the Trout Creek Project EA. As I understand it, the Trout Creek guidelines were put in place to monitor/limit visitor use on a daily and seasonal basis to prevent further degradation of recreational areas and to provide a quality recreation experience. Once again, the Whitebark Pine Restoration project work will be done during low recreational use and great care will be exercised. Short-term visitor inconveniences will provide long-term positive enhanced forest habitat and species diversity for the recreational visitor to enjoy.

Response: Table 4-4 (EA pages 4-18, 4-19) displays the RVD guidelines and projected RVDs required for conducting the work. While each alternative has the potential to exceed the guidelines, Alternative 2 would exceed guidelines in 11 various areas while Alternatives 3 and 4 would exceed guidelines in 6 areas.

The objective of the Trout Creek Area Recreation Project was, “to manage the fragile high elevation ecosystem in a way that will be consistent with grizzly bear and caribou recovery while providing a quality recreation experience,” Trout Creek Project Decision Notice, page 1. Considerations for that project’s analysis and decision did not include potential effects to forest health or the whitebark pine component of the ecosystem. The decision specified the size of groups that would be allowed to stay overnight at all lake areas, when free group permits would be required, and the number of permits that would be issued per year. It also outlined the numbers and general locations of campsites that would be developed at area lakes and the criteria for hiker-only spur trails at each lake.

The Decision Notice included the following provisions (Trout Creek Project DN, pages 2 and 3):

Group sizes and overnight use limitations

Groups between 6 and 12 people will be limited to 3 nights use at each of the area lakes. After 3 nights stay at any one lake, the group could move to another lake for another 3 nights, etc. Groups of more than 12 people will be required to obtain a free permit. Three or four permits, including administrative and institutional use, will be issued each year.

Designated campsites as follows

Pyramid Lake 6 or 7 defined campsites with a short spur trail for access
Ball Lakes basin no more than 6 defined campsites with the two-lake basin
Trout Lake 3 to 5 campsites
Big Fisher Lake 5 campsites

The tradeoff between short-term visitor inconveniences and the long-term benefits of whitebark pine restoration are recognized in the recreation analysis. Alternatives 3 and 4 respond in a more balanced manner as explained in the EA, "Some short-term effects are inconsistent with the recreation guidelines. ...However, whitebark pine trees are an integral part of the high elevation environments as well as an important component of high elevation recreation. Maintaining the rapidly declining whitebark pine populations within the Selkirk Mountains, through the implementation of Alternative 3 [or 4], justifies these short-term deviations from the area guidelines." (EA page 4-27.)

For information -- One Recreation Visitor Day is equal to one visitor spending 12 hours in an area; thus 1 person staying from Friday evening through Sunday evening, would be 4 RVDs. For example, a group of 10 people staying at one lake from Monday evening through Thursday morning would be within the limitation of 3 nights at one lake. The group would equal 60 RVDs during their stay (each person would equate to 6 RVDs).

R-07 Comment: There were some concerns about visual impacts of the treatments.

Response: Visual sensitivity is high. In the short-term, project areas would be blackened and visible from many vantage points; however, greenup would start within the first year and the visual impact in the background and middle ground would decrease over time. In the long-term, from a distance, the action alternatives are compatible with scenery management direction. In the foreground, visual impacts would vary depending on the recreational visitor and the area that was treated. Cross-country travelers would see minimal amounts of downed trees but probably not enough to impede travel. The project would have negligible effect on Parker Creek Trail #14, due to the timing of work and the low recreational use on this trail. Trails #12 and #92 access the Russell Mountain and Russell Ridge treatment areas and also receive low recreation use. The post project experience would be consistent with what a user would expect following a wildfire in remote backcountry, especially since the slashing activities would be visually screened from the trails. The south face of Russell Ridge is already strongly modified, thereby reducing the sensitivity a cross-country traveler would have for blackened stumps. Farnham Ridge Trail #202 and Eneas Trail #93 are unimproved trails; the project would not affect the recreation experience along these trails.

Comments concerning Long Canyon

LC-01 Comment: Some environmental groups are opposed to any types of treatment in the Long Canyon drainage for fear that the project would set a precedent for future management activities, such as timber extraction. IPNF Forest Plan Roadless Area analysis stated: 1) the area does not lend itself to economic timber harvest because of high road development costs, and 2) the timber contained in the area is not needed for Boundary County's economy because it is an insignificant amount in the context of the total timber needs for local mills. Additionally, as an MA11 area, no timber extraction or road-building is allowed.

Response: Alternative 4, a refinement of Alternative 3, was developed in response to concerns about proposed management within Long Canyon. This alternative dropped three burn only areas approximately 330 acres in total size. (Please note that page 4-7 of the EA has a typographical error in Table 4-3. Alternatives 3 and 4 should

show 143 acres of treatment near Cutoff Peak in the Cutoff Creek drainage, rather than within Long Canyon as printed.)

The uppermost portion of Long Canyon and the higher elevations on the southeastern side of the drainage are within MA11 (proposed wilderness); the remainder of the drainage is within MA10 (high value for semi-primitive recreation). The maps on pages 1-12, 2-11, 2-17, and 2-23 display the management areas and proposed treatment areas for each alternative.

Forest Plan MAs 10 and 11 do not permit regulated timber harvest (Forest Plan pages III-44 and III-49). MA10 does not allow motorized vehicles in Parker Canyon or Long Canyon (Forest Plan page III-43). MA11 does not allow construction of new roads (Forest Plan page III-50.)

Pages 2-7 and 2-8 of the EA describe the Timber Harvest Alternative that was considered by the interdisciplinary team and the reasons it was dropped from detailed study.

Comments concerning prescribed fire

PF-01 Comment: Some environmental groups are concerned about the appropriateness of using prescribed fire as a management tool in roadless or proposed wilderness areas.

Response: Use of prescribed fire within MAs 9, 10, and 11 is allowed by the Forest Plan, “Identify specific areas where prescribed fire may be beneficial and cost effective in achieving the objectives of the management area.” (Forest Plan page III-41, III-45, and III-50)

Letter 02 – Kinnikinnick Chapter of Idaho Native Plant Society

Comments concerning alternatives or alternative selection

A-01 Comment: We support restoration of the whitebark pine species and ecology, and concur that Alternative 4 is preferred.

Response: Thank you for your support of this project. Alternative 4 is my preferred alternative because it is a reasonable balance between concerns for whitebark pine and considerations of wildlife habitat needs, recreation opportunities and supplying quality water in the Myrtle Creek watershed for the City of Bonners Ferry municipal water system. See Letter 01 comment A-01 for more information.

Comments concerning noxious weeds

NW-01 Comment: We appreciate that roads will not be constructed or reconstructed in wilderness study areas. Roads often facilitate the spread of noxious weeds. We urge that you maximize the efforts to keep weeds out of areas not previously infected.

Response: Noxious weeds were recognized and considered as one of the biological factors for this project. Within the project area, weeds will be monitored in helispots, along trails, and at campsites used by work crews. Treatment of existing weeds will be done under the guidelines in the Bonners Ferry Noxious Weed Management FEIS and ROD. (EA, page 2-25)

Letter 03 – Idaho Department of Fish and Game

Comments concerning alternatives or alternative selection

A-01 Comment: We support restoration of the important high elevation whitebark pine community, which is increasingly underrepresented throughout its range. Protection and restoration efforts, including re-establishing historic fire regimes, are necessary to maintain this unique ecosystem. We are encouraged that this effort may provide an increase in important forage for grizzly bears, Clark's nutcracker, and numerous other wildlife species.

Response: Thank you for your support of this project.

Comments concerning the water resources

WR-01 Comment: We do not anticipate that the proposed action will have significant impacts on fisheries or water quality. No instream work is proposed that would impact stream hydrology or water quality. The project will follow Inland Native Fish Strategy (INFS) guidelines and Idaho Forest Practices Act BMPs.

Response: Water resources were identified as a principle issue; with the quality for the Myrtle Creek municipal watershed as a specific consideration in design of the proposal (EA, page 2-5). The use of BMPs to meet the Idaho Forest Practices Act is discussed on pages 3-37 and outlined in detail in Appendix C, part B. The EA summarizes the potential effects to the water resources on page 4-71 through 4-73. The types of treatments that will be used will not increase soil compaction, change soil structure, increase channel densities, or completely remove organic materials from the forest floor. Any increase in sediment production would not be measurable and recovery would occur within one year, essentially within the next growing season. All management activities will be conducted outside riparian habitat conservation areas; thus changes in sediment production or delivery are not expected. Inland Native Fish Strategy and BMP requirements will ensure that any sediment that may be generated will be filtered prior to reaching stream channels. No noteworthy effects that would degrade watershed resources are expected to occur under implementation of Alternatives 2, 3, or 4.

None of the important parameters for fish habitat (water temperature, frequency of large woody debris, bank stability, undercut banks, width to depth ratio, pool quality and frequency, and sediment) would be affected by the proposed activities. There will be no cumulative effects to fish populations or their habitat. (EA page 4-72)

WR-02 Comment: [It is our understanding that] None of the streams are 303d listed.

Response: That is correct. The project area encompasses about 135,000 acres of Parker, Trout, Fisher, Myrtle, Ball, Long Canyon, Smith, Lost, Clark, and Burton Creek watersheds; all tributary to the Kootenai River as shown in Figure 3-10 (EA pages 3-39, 3-41). None of these streams or stream segments is currently listed for any water quality constituent on the 303d list (EA page 3-37).

Letter 04 – Idaho Conservation League

Comments concerning alternatives or alternative selection

A-01 Comment: We support efforts to restore whitebark pine, but believe the Modified Proposed Action [Alternative 2] endangers other short-term and long-term goals for the project area, namely future wilderness designation.

Response: Management Area 11 proposed wilderness is shown in Figure 1-2 (EA page 1-12). Wilderness areas can be formally designated only by Congress. Pending Congressional decision on the Selkirk Crest area, the IPNF Forest Plan goal is to manage the lands to protect wilderness characteristics (Forest Plan page III-48). While Alternative 2 would treat the largest amount of MA11; the treatments are consistent with Forest Plan direction, which allows for the use of prescribed fire within MA11 when it would be beneficial and cost effective in achieving management area objectives (Forest Plan page III-50).

Alternative 4 was developed in response to concerns about proposed activities within MA11. This alternative dropped three burn-only areas in Long Canyon, approximately 330 acres in total size. (Please note that page 4-7 of the EA has a typographical error in Table 4-3. Alternative 4 should show 143 acres of treatment in Cutoff Creek (MA10), rather than Long Canyon Creek as printed.)

Forest Plan MA11 does not permit timber harvest (Forest Plan page III-49) or construction of new roads (Forest Plan page III-50.)

Pages 2-7 and 2-8 of the EA describe the Timber Harvest Alternative that was considered by the interdisciplinary team and the reasons it was dropped from detailed study.

Comments on whitebark pine and silviculture

WBP-01 Comment: The burn-only treatment represents experimental management that may have very little chance of significantly improving the viability of whitebark pine.

Response: The burn-only treatment was proposed to avoid potential conflicts about use of chainsaws in MA11 to reduce the competing vegetation and create a slash bed. Alternatives 2 and 3 include three burn-only areas within the upper portions of Long Canyon Creek drainage, totaling about 332 acres, including 143 acres identified as having high potential for natural regeneration of whitebark pine (EA page 4-7). Alternative 4 does not include any burn only treatments.

As stated in the EA (page 4-5) the burn only treatment is not the preferred method. To limit the amount of potential secondary burning, the stands would need to be burned when there are fairly moist conditions throughout the area. Without the slash layer to facilitate drying in the target stands, a more intense ignition system, such as helitorching, would be needed. Even then, it is anticipated that the objective of creating a seed bed for natural regeneration would be only partially met at best. In the Smith Creek project on the Bitterroot National Forest, areas that were treated with prescribed fire without a slash layer burned a little more than 50% of the area. However, in areas that had a more continuous slash layer, the prescribed fire burned approximately 80% of the area (EA page 4-3); thus creating more favorable conditions for regeneration.

WBP-02 Comment: We would like to see treatments limited to areas that have high potential for natural regeneration. Treating other areas ensures that human management of the area will be highly visible in both the short- and long-term, while having questionable effects on the whitebark pine in these areas.

Response: The project design included a high degree of consideration for visual effects and includes features to reduce potential impacts. Treating only the whitebark pine stands with the highest potential for natural regeneration would unnecessarily limit the restoration potential for this project. Alternatives 3 and 4 would be reduced by about 140 acres; Alternative 2 by about 2200 acres.

The proposal included three types of treatments in recognition of the variations in the current conditions of the whitebark pine component in the Selkirks – whitebark pine release, slash and burn, and burn only. Each of the treatments will have slightly different visual effects.

Slashing and prescribed burning – In stands where whitebark pine is no longer the dominant species that it was historically, competing trees (primarily subalpine fir) generally less than 5 inches in diameter would be cut. The slashing would be in patches 2 to 5 acres in size in an irregular pattern over 25 to 50% of the area.

Visible effects of the slash and prescribed burn treatment would be most noticeable immediately following the work. However, since the activities are planned for the low use period after Labor Day, the impact on recreational users would be minimal. The requirements for low stump heights, visual buffers and irregular shapes of treatment areas would be followed. No firelines would be used; thus, the prescribed fire would advance slowly down slope, smoldering with creeping hot spots creating a “feathered edge” rather than a hard line with a mechanical appearance. At these elevations, the late summer–early fall weather conditions are typically cool days with relatively high humidity; factors that will reduce the chance of the fire spotting into the unslashed timber stands. The areas of prescribed burn area will be irregular, mimicking a naturally occurring wildfire with clumps, irregular stringers, and islands of unburned green trees and brush throughout the area. Greenup and growth of grasses and small plants would start the first fall or following spring. Winter snows would flatten and help to decompose any unburned material; the impact in the background and middle ground would lessen with time. User sensitivity to visual impacts in the foreground would vary depending on the user and the area. From a distance, the resulting mosaics would be consistent with the line, form, and textures found in the natural Selkirk landscapes. (See EA page 4-74 for more information on the natural integrity and appearance of the area.)

Burn only -- Burned areas would be blackened and visible, with effects similar to the slashing and burning. The main visual difference would be the lack of stumps and down material in this treatment. There would be no mechanical treatment. Mosaics would be consistent with the line, form and texture found in the Selkirk Mountains. (EA page 4-15)

Whitebark pine release – As the needles on the cut trees die, their red color would dominate the treatment areas at first but would become less obvious within a season or two when the needles fall off and the small branches are flattened by snow and become to decompose. (EA page 4-15)

WBP-03 Comment: Clarify how the amounts of whitebark pine cover type after treatment were estimated on page 4-6. It is highly likely these estimates have a large margin of error given the experimental nature of the treatment.

Response: The methods for determining expected effects are discussed in the Methodology section of the EA (page 4-1). Information used in the analysis came from the district timber stand database, aerial photos, maps, field reconnaissance, stand examination records, historic records, and the Scientific Assessment for the Interior Columbia Basin Ecosystem Management Project (ICBEMP).

Direct and indirect effects to forest structure and composition were measured by analyzing changes to species composition, stand structure, and pattern – through combinations of burning, slashing, or slashing and burning the competing species. Effects were also measured by the amount of area that would be treated. The whitebark pine release treatments are included as a type of slashing in this discussion.

The direct and indirect effects of the prescribed burning on the reestablishment of the whitebark pine cover type were measured by estimating the number of acres treated. The BEHAVE model was used to determine the maximum acreage that would burn (treated acres plus acres in potential secondary burn area).

The table showing Whitebark Pine Cover Type by Alternative (EA page 4-7) utilizes information described above to determine the current conditions in the whitebark pine zone and the anticipated changes in whitebark pine cover type. The increase in whitebark pine cover is calculated from the number of acres burned, which is directly related to the acres of suitable land with increased potential for reforestation by Clark’s nutcracker; as well as the number of acres where the natural role of fire would be restored, and the acres of whitebark pine release treatment (considered “slashing” in this discussion). Essentially, the more acres that are treated, results in more acres where

whitebark pine will be reestablished as the dominant cover type.

WBP-04 Comment: The Forest Service should compare the effectiveness of girdling, cutting and burning competing conifers.

Response: The effectiveness of burning versus cutting competing conifers relates to returning fire as a process into the whitebark pine ecosystem. As Keane and Arno state (2001), the long-term outlook for whitebark pine is not without hope, but restoring whitebark pine ecosystems cannot be accomplished without returning fire to subalpine landscapes. They further state that maintenance of native fire regimes is the single most important management action to ensure conservation of whitebark pine. Implementation of the Whitebark Pine EA would be the first step in restoring these native fire regimes.

The advantage burning has over cutting, or girdling, conifers relates to regeneration processes. Tomback (1989) stated that whitebark pine establishes from seed on open mineral soil seedbeds created by mixed-severity and stand-replacement fires. Clark's nutcrackers prefer open sites with mineral soil for caching, and readily cache seed on large openings created by stand-replacement fire and in smaller openings created by mixed-severity fire. Most seed is cached in the first good cone crop year following fire, but Clark's nutcrackers may continue to build up the seed bank for decades as long as the site remains open and whitebark pine seed is available.

WBP-05 Comment: The underlying assumption for any Whitebark Pine restoration is that Clark's nutcracker will disperse seeds. ... the Forest Service should ensure that the ground is clear for the birds to land and cache seeds. Competing vegetation should be either lopped, scattered, and broadcast burned or hand-piled and jackpot burned. Slash piles should be burned that fall or next spring to prevent Ips beetles from being drawn to the piles and infecting neighboring whitebark pine trees.

Response: The slash and prescribed burning treatments are designed to prepare the treated areas for natural regeneration just as you have described. Between 10 and 15 percent of the small diameter trees, generally less than 5-inch dbh, would be cut and left on site. This would create a scattered fuel bed of cured needles, twigs and small tree trunks, in addition to the existing down trees, brush, grass and similar combustible materials. The prescribed fire would be initiated under conditions that allow for good ignition and burning. It is predicted to burn successfully providing the site preparation necessary for either natural planting of the whitebark pine seeds by Clark's nutcracker or artificial planting of nursery grown stock.

See the response to WBP-04 for additional information.

WBP-06 Comment: This project should test local whitebark pine seeds for blister rust resistance.

Response: The Idaho Panhandle National Forest is currently involved in a Northern Region effort to identify whitebark pine that may be resistant to white pine blister rust. Fifteen whitebark pine trees, located in 2001, phenotypically appear to display some resistance. Cones were collected and seedlings grown as part of a regional program to test for genetic resistance to blister rust. (project file, Zack Monitoring Report, 2001)

There was no whitebark pine cone crop in 2002, so there were no collections. Over a five year period, the IPNF will identify and collect cones from approximately 75 trees and extract the seed. Seedlings will be screened with the hope of eventually developing seed sources for blister rust resistant whitebark pine to help restore the species to its natural ecological role. Other National Forests are also collecting cones and growing seedlings with the same goal in mind. (Forest Plan Monitoring Report, 2002)

WBP-07 Comment: Design and funding of any restoration work should include plans to return to the area after 10 years to evaluate the results. The planning and results should be made available to other researchers in publications such as the Intermountain Research Station's Nutcracker Notes and other appropriate journals. The project, implementation and outcome should be available on the IPNFs website.

Response: The IPNF is currently assessing the potential for monitoring/research project to be conducted by the Rocky Mountain Research Station based in Missoula, Montana.

WBP-08 Comment: Logging – the final decision should prohibit any cutting, injuring or otherwise impacting living whitebark pine trees. According to the EA, whitebark pine trees that could be hazardous during slashing operations could be cut. Living whitebark trees that may be resistant to blister rust are irreplaceable and logging these trees should be expressly forbidden.

Response: This is not a 'logging' project. It is not the purpose nor intent of this project to cut whitebark pine trees, either live or dead. Slashing treatments will focus on the small diameter trees, generally less than 5 inches dbh, of competing species (primarily subalpine fir; also some lodgepole pine, and Engelmann spruce.) The whitebark pine release treatments will cut the vegetation that is overcrowding/competing with whitebark pine including brush, subalpine fir, lodgepole pine, and Engelmann spruce. Both treatments will leave the slash on site. None of these small trees will be removed. Trees of any species that are identified as a hazard to the work crew would be cut as necessary to maintain safety of the crew. Such trees would also be left on site.

Comments on proposed wilderness area (MA11)

W-01 Comment: The burn-only treatment lies within the proposed wilderness area. We would like to see it excluded due to the fact that management of any sort could threaten this designation and open the floodgates for further intrusion into the area. Since success of the burn only treatment would only partially meet the project's objectives, if at all; it is not worth risking the loss of future wilderness designation.

Response: Alternatives 2 and 3 do include burn-only treatments in MA11 (proposed wilderness). This is consistent with Forest Plan objectives and standards that allow use of prescribed fire within MA11 (Forest Plan page III-50). The proposals do not include commercial harvest or construction of any roads, neither of which are allowed in MA11 (Forest Plan page III-49 does not permit timber harvest; Forest Plan page III-50 does not allow construction of new roads.)

Alternative 4 was developed in response to concerns about proposed management within Management Area 11 (proposed wilderness). This alternative dropped three burn only areas in the MA11 portion of Long Canyon approximately 330 acres in total size. (Please note that page 4-7 of the EA has a typographical error in Table 4-3. Alternative 4 should show 143 acres of treatment near Cutoff Peak in the Cutoff Creek drainage, rather than within Long Canyon as printed.)

The interdisciplinary team did consider a Timber Harvest Alternative. Pages 2-7 and 2-8 of the EA describe the alternative and the reasons it was dropped from detailed study. Future timber harvest and road construction are highly unlikely for the same reasons. Over one-half of the entire project area is within management areas that specifically disallow regulated timber harvest (MA9 and MA10 standards state, "No regulated timber harvest" and MA11, "Timber harvest will not be permitted.")

W-02 Comment: We are deeply concerned that the project may hinder future wilderness designation of the area. The EA states on page 4-24 that alternative 2 may not adequately protect the Management Area 11 lands, proposed wilderness areas, future wilderness designation.

Response: Potential for a future Congressional decision for formal wilderness designation will not be jeopardized by the whitebark pine restoration activities, as described above in response to comment W-01.

Comments on Inventoried Roadless Areas

IRA-01 Comment: The Whitebark Pine EA comes to the conclusion that there is no Roadless Area Conservation Rule in effect. This is inaccurate.

Response:

The Roadless Area Conservation Rule limited road construction and reconstruction and certain timber harvest activities within inventoried roadless areas. It has been challenged by nine lawsuits in Federal District Courts. In the lawsuit brought by the State of Wyoming (Case No. 01-CV-86-B), the Federal District Court of Wyoming permanently enjoined and set aside the roadless rule nationwide on July 14, 2003. The court found that the

roadless rule was promulgated in violation of the National Environmental Policy Act and the Wilderness Act.

On July 16, 2004, the U.S. Department of Agriculture published a Notice of Proposed Rulemaking in the Federal Register to replace the Roadless Area Conservation Rule (36 CFR part 294 (66 FR 3244)) adopted January 12, 2001 but subsequently permanently enjoined July 14, 2003. The Roadless Area Conservation Rule would be replaced with a petitioning process providing Governors an opportunity to seek establishment of management requirements for National Forest System inventoried roadless areas within their states. The Department also reinstated interim direction regarding Delegation of Authority and Interim Protection of Roadless Areas. The interim direction is being reinstated because of the continued legal uncertainty of implementing the Roadless Area Conservation Rule (36 CFR part 294).

The Whitebark Pine Restoration project does not include any road construction or reconstruction. The silvicultural treatments are cutting generally small diameter trees to improve habitat for a species of concern (specifically, whitebark pine), and to maintain or restore characteristics of ecosystem composition and structure. The trees will be burned or left on site; they will not be removed or sold.

Cumulatively, the overall degree of natural integrity, appearance, opportunities for solitude and remoteness, primitive recreation opportunities, and unique features for the majority of the Selkirk Roadless Area would remain high. The project was reviewed by the Regional Forester and found to be consistent with Forest Service policy and direction regarding management of inventoried roadless areas. The project came under the exception described in FSM Interim Directive 1925.04.a.2 for removal of small-diameter material to maintain or restore the desirable characteristics of ecosystem composition and structure (project file letter *Whitebark Pine Restoration Project* dated 11/15/02 and signed by Regional Forester Bradley E. Powell).

Comments on Wildland Fire

WF-01 Comment: A Wildland Fire Use alternative was not included in the EA because a fire risk assessment and fire management plan would be needed before any wildfires are allowed to burn. This is an inaccurate statement. A risk assessment is not required under the Federal Wildland Fire Management Policy. Regardless, the IPNF has completed a Wildfire Hazard Risk Assessment for the North Zone, which includes the project area. To implement and Wildland Fire Use alternative, the IPNF could have prepared a Wildland Fire Use Implementation Plan, at a significant cost savings to the Forest. Both for planning and implementing the Whitebark Pine Restoration EA as well as for future fires that will be suppressed in the area.

Response: The IPNF does have a completed Fire Management Plan that is revised on an annual basis. However, in order to use naturally ignited wildland fire for resource benefits, the forest must complete site specific Wildland Fire Use Plans and incorporate them into the Fire Management Plan. A review of the IPNF Forest Plan and Forest Plan EIS reveals that only MA 11 (Wilderness and proposed wilderness) was intended to be managed for wildland fire use, and there is some question as to whether this direction applied to proposed wilderness or just designated wilderness.

The current leadership on the IPNF plans to consider wildland fire use for more areas, rather than just wilderness/proposed wilderness. Instead of analyzing small scale implementation of wildland fire use at a project level, the Forest is taking a broad look at wildland fire use as part of the current efforts on Forest Plan Revision. The IPNF planning team has already started working with the public to build the support necessary for development of a Wildland Fire Use Plan. Until this plan is in place, current policies for fire suppression will continue.

WF-02 Comment: The EA (page 3-11) leads the reader to believe that the fire regime (or return interval) has been drastically altered as a result of fire suppression. While there is broad agreement that some fire cycles have been missed, even in these infrequent fire regimes, this broad statement is a misrepresentation of best science available.

Response: A fire regime condition class is a classification of the amount of departure from the natural regime. Condition classes are designated as 1, 2, or 3. The classification is based on a relative measure describing the degree of departure from the historical natural fire regime. The departure results in changes to one, or more, of several ecological components, as follows: vegetation characteristics (species composition, structural stages, stand age, canopy closure, and mosaic pattern); fuel composition; fire frequency, severity, and

pattern; and other associated disturbances such as insect and disease mortality, grazing or drought conditions. (Project file *Fire Regime Condition Class Definitions*)

The following discussion describes the features of Condition Class 3, followed by the historic and current conditions in the whitebark pine ecosystems.

Condition Class 3 (fire regimes have been substantially altered from their natural (historical) range) is used to categorize areas with the following characteristics:

- The risk of losing key ecosystem components is high.
- Fire frequencies have departed from natural frequencies by multiple return intervals.
- Dramatic changes occur to one or more of the following: fire size, intensity, severity, or landscape pattern.
- Vegetation attributes have been substantially altered from their natural (historic) range.

More specifically, vegetation species composition and structure have been substantially altered from their historical range at patch and landscape scales. In forestlands there have been high increases in density, encroachment of shade tolerant species, or high loss of shade intolerant species caused by fire exclusions, logging, or exotic insects or disease. Insect and disease populations have been substantially altered; these areas typically show higher mortality or defoliation. (Project file *Fire Regime Condition Class Definitions*)

Changes away from the natural historic condition are described in the EA. White pine blister rust and mountain pine beetle have caused a substantial decline in whitebark pine and there is a high degree of risk that this key ecosystem component could be lost. Already, nearly 70 percent of the trees are infected with blister rust. Surveys in 2000 and 2001 showed that nearly 40 percent of the whitebark pine in the survey area had been killed by mountain pine beetles. Across the IPNF, as much as 95 percent of the whitebark pine has died in stands where it used to be a major component of the vegetation. The areas are now dominated by shade-tolerant grand fir, hemlock Douglas-fir, and subalpine fir. Tree species that are more vulnerable to diseases, insects, and fires. Trees that are less adapted to fire, drought, and natural climatic variability. The results are more insect and disease problems and higher fire risk. (EA pages 1-1 and 1-2)

The findings of the North Zone GA included the following conditions:

- Alterations in the disturbance and succession regimes,
- Substantial reduction in the early seral component, including whitebark pine,
- A major shift in forest structure from old growth to medium/immature size classes,
- Modifications in landscape patterns to landscapes that are more uniform. Patches are smaller, openings are more numerous, but smaller in size and more scattered across the landscape. (EA page 3-3)

The fire history of the area is described in Chapter 3 of the EA. Fire suppression has almost eliminated low and mixed severity fires as natural disturbance agents and relegated stand-replacing fires to infrequent events occurring during extreme weather conditions (NZ GA, draft). Under current wildfire suppression policies, the fire return interval for whitebark pine areas has been estimated at about 3000 years. This is ten times the historic average (Tomback et al, 2001). (EA page 3-11)

Research of the fire history in the Selkirk Mountains determined that from the late 1800s through the early 1900s, years when no efforts were made to eliminate wildfires, several large fires within the assessment area burned tens of thousands of acres. The most prominent years were 1890, 1895, 1921, 1925, 1928, 1929, 1930, and 1931 – 7 prominent fire seasons out of 41 years. (EA page 3-10) “Fire was the primary disturbance factor throughout the assessment area. ...Historically one-third of the landscape in the Kootenai sub-basin would have experienced a stand-replacement fire over a 70-year period, and the majority of the landscape would have experienced a mixed-severity fire (EA page 3-6).

District fire records dating back to 1941 show only 11 fires have burned more than 10 acres, 19 were between 1 and 10 acres, 229 were less than 1 acre. (EA page 3-10) A definite change in fire size, intensity, severity and landscape pattern from what occurred near the turn of the last century.

Under current wildfire suppression policies, the fire return interval for whitebark pine areas has been

estimated at about 3000 years – ten times the historic average. (Tomback et al, 2001)

The EA utilized information from many sources to evaluate the fire history and current conditions within the project area. The following sources are cited:

- Allen, 1999, The Effects of 115 Years of Vegetation Change on Woodland Caribou Habitat in the Selkirk Mountains of Idaho;
- Clark and Sampson, 1995 Forest Ecosystem Health in the Inland West;
- District wildfire records 1941 to 2003;
- Tomback, et.al. 2001, Whitebark Pine Communities: Ecology and Restoration;
- North Zone Geographic Assessment, August 2000;
- Smith and Fischer 1997, Fire Ecology of the Forest Habitat Types of Northern Idaho;
- Reynolds 1990, Whitebark Pine Ecosystems: the threats and the challenge;
- IPNFs 2000, Synthesis and Interpretation of Terrestrial Information, Step 5 of Sub-Basin Ecosystem Assessment, North Zone Geographic Assessment;
- O’Laughlin 1993, Forest Health Conditions in Idaho
- Zack, 1995; Northern Idaho Forest Ecosystems: Historic Conditions and Current Trends in Forest Succession, Fire, Timber Harvest, and Landscape Pattern.

Comments on the Trout Creek Recreation Project

TR-01 Comment: It is clear the project is not consistent with the guidelines of the Trout Creek Project. Development of new campsites, trails, and helispots would permanently change the landscape and would also affect the primitive nature of these lands. Due to the fact that Alternative 4 is the “most compatible” with the Trout Creek Project, it is also the preferable alternative in this regard.

Response: Alternatives 3 and 4 respond to the recreation concerns by treating fewer acres and locations of whitebark pine stands. However, all alternatives have the same required mitigation measures for the work crews’ camps and scheduling of activities (EA page 2-28). Alternative 2 is the least compatible with the goals and guidelines of the Trout Creek Recreation Project

TR-02 Comment: Alternative 2 would have a significant influence on areas outside the Trout Creek Project area.

Response: As explained in the response to the previous comment, Alternative 3 was designed in part to respond to recreation concerns. Because it treats more areas and total acres, Alternative 2 does have potential for a greater impact on recreation. Alternative 4 is the most compatible with the Trout Creek Recreation Project.

Comments on Scenic Integrity

Comment: It is difficult to understand the glaring contradiction between discussions for Alternative 2. “In the long term, from a distance, all physical changes to the landscape would be consistent with the Selkirk ‘sense of place.’” The summary concludes, “This alternative would also change the recreation environment and ‘sense of place’ for many users throughout the project area for the long term.” Given its high priority for minimizing this disturbance, Alternative 4 is clearly the preferable alternative.

Response: *Scenic Integrity Consistent with Selkirk Sense of Place* was one of the issues analyzed for this project. The scenic integrity of any area includes the individual’s sensitivity to the visual environment as well as the distance from the focal point. The EA summarized effects for all action alternatives (EA pages 4-15, 4-16). The statements were not meant to be confusing or contradictory, but point out the difference between close views and distant views, and between short-term and long-term effects. “In the long term, from a distance, all action alternatives are compatible with scenery management direction. The resulting mosaics would be consistent with the line, form, and texture found in the Selkirk landscapes. User sensitivity and visual impacts in the foreground, ... would vary depending on the user and the area being treated.” (EA page 4-15, emphasis added to aid in understanding.)

The Alternative 3 and 4 conclusions for this issue were the same as those for Alternative 2 (EA pages 4-27 and 4-28).

See the response to comment WBP-02 above for additional information on the visual effects of the treatments.

Comments on wildlife

WL-01 Comment: We are concerned that the large scope of Alternative 2 will adversely impact caribou in the project area. EA page 4-41 acknowledges, “Alternative 2 would modify substantial percentages of all other seasonal habitats, particularly in the Trout-Ball and Myrtle CMUs.”

Response: As explained in the methodology for woodland caribou (EA page 4-31), the analysis used a worst-case scenario assumption that all treatment areas would be unsuitable following project work, as would the secondary burn areas. The total amount of suitable habitat that would be lost was calculated as the sum of acres of primary treatment areas and acres of secondary burn areas. It is important, as explained in the EA, to remember that forest stands in caribou habitat may currently be suitable for more than one season of use. Merely summing the various suitable season habitat acres will grossly overestimate the amount of suitable habitat that will be treated.

None of the alternatives (2, 3, or 4) would reduce the amount of early winter cedar hemlock (EWCH) habitat, which is likely the most limiting seasonal habitat component for woodland caribou. As you state, Alternative 2 is predicted to modify substantial percentages of all other seasonal habitats, particularly in the Trout-Ball and Myrtle Caribou Management Units and may cause unfavorable changes to woodland caribou habitat.

Alternative 3 was designed, in part, to respond to concerns about woodland caribou. It dropped a little more than 2300 acres of primary treatment areas and 830 acres of secondary treatments within currently suitable habitat. Notable differences between the two alternatives are that Alternative 3 splits the Fisher-Farnham treatment area into two much smaller areas (Big Fisher and Farnham Ridge) and reduces treatments on suitable habitat in the Myrtle CMU to less than one acre (EA page 4-38). Alternative 4 does not include treatments in the Long Canyon Creek drainage, thus having even less effect on suitable habitat.

Alternatives 3 and 4 would have considerably less influence on seasonal habitats. Activities would be concentrated during late summer and fall, in open-canopied stands that serve mainly as late winter or spring/calving habitat; thus the timing of activities is outside the expected season of use. The treatment areas are on high, windswept ridges that do not produce significant quantities of forage and are not highly preferred as foraging areas in this ecosystem. These alternatives are unlikely to cause substantial effects to woodland caribou.

The U.S. Fish and Wildlife Service concurs with the biological findings for this project (project file letter dated April 9, 2004).

Comments on off road vehicles

ORV-01 Comment: ORVs and ATVs can have devastating impacts on forest ecosystems. Describe how you will effectively monitor and control their use in the project area. Include effectiveness of the measures as well as funding and number of personnel available for monitoring and enforcement.

Response:

The treatment areas are entirely within the Selkirk Roadless Area, with two small exceptions (approximately 10 acres and 80 acres in size) in Alternative 2 (EA page 3-51.) This project will not construct or reconstruct any roads or recreation trails. Early public involvement and internal review of the proposed project did not identify use of ORVs or ATVs as a concern.

Most of the treatments will take place in Primitive lands or Semi-Primitive Non-Motorized areas (SPNM). A small amount is in Roaded-Modified Non-Motorized areas (RMNM.) In Primitive Class 1 lands, the majority of the areas are almost completely unaffected by human actions. In Primitive Class 2 areas, recreational use is transitory and infrequent with less than 10 people per normal use season; on several short ridges without trails. Typical use in Primitive Class 3 areas is along trail corridors and around lakes accessed by trails. Use along the trails has been

monitored for more than 15 years. A large portion of the project area was included in the May 1995 decision for the Trout Creek Recreation Project, which set guidelines for use levels and patterns (see map on EA page 3-20.)

The Trout Creek Decision continued the prohibition of motorized vehicle use off Trout Creek Road #634. The decision also provides a backcountry guard whose duties include contacting visitors and explaining the area's use restrictions. Monitoring was conducted on an annual basis during the life of the Trout-Fisher Timber Sale and has continued on a regular basis since then. Law Enforcement personnel are available at the request of the backcountry guard. The Trout Creek Project did not identify illegal motorized use as a concern. (Project file document, Trout Creek DN and FONSI)

Comments on noxious weeds

NW-01 Comment: The Forest Service needs to address how the proposed projects will affect noxious weed importation and establishment, and coordinate efforts with the local cooperative weed management areas. All vehicles need to be washed before and after use.

Response: Noxious weeds were recognized and considered as one of the biological factors for this project. Within the project area, weeds will be monitored in helispots, along trails, and at campsites used by work crews. Treatment of existing weeds will be done under the guidelines in the Bonners Ferry Noxious Weed Management FEIS and ROD. (EA, page 2-25)

Letter 05 – The Ecology Center also for Alliance for the Wild Rockies and The Lands Council

Comments concerning whitebark pine

WBP- 01 Comment: Given the experimental nature of the proposed vegetation manipulation, we urge the Forest Service (FS) to adopt a cautious approach. We note that the EA cites very little in the way of scientific research in support of the expected outcomes of the vegetation manipulation. If there are experts in the field of whitebark pine, the EA does not indicate they've been consulted in any great detail.

Response: Although projects designed specifically to restore whitebark pine ecosystems are relatively new, the techniques and principles behind this project have proven successful in other applications.

Dana Perkins, PhD. Research Ecologist, for the Pacific Northwest Research Station of the U.S. Forest Service stated in her 2002 publication *An Ecologist's View of Whitebark Pine* (project file), "Restoration efforts are beginning in the northwest. This is timely for mortality rates are high and this is a slow-growing tree. ...whitebark pine is considered [a] keystone species of subalpine forests.

"Whitebark pine is at risk of severe population decline over much of its northern distribution. Several interacting factors are recognized as causing rates of mortality that are higher than establishment. [Including] successional replacement by shade tolerant species as a result of fire suppression (Arno and Hoff 1989, Keane et al. 1990, Morgan and Bunting 1990, Kendall and Arno 1990, Keane and Arno 1993). ...Fire suppression of the last 80 years has favored the successional replacement of whitebark pine by shade tolerant species such as subalpine fir and Engelmann spruce (Arno and Hoff 1989, Murray 1996). This shift in species composition and the consequences of this successional trajectory have been discussed and modeled by Kean et al. (1990, 2001). Prescribed burning and silvicultural treatments are now being used to restore whitebark pine ecosystems on National Forest lands throughout the northwest." (emphasis added)

Other research scientists from the Rocky Mountain Research Station and Forestry Sciences Laboratory have recognized that white pine blister rust, insect attacks and fire suppression have all had an impact on whitebark pine.

“To manage whitebark pine in the presence of blister rust, it becomes critical to address another major threat, fire exclusion. The most cost effective and ecologically responsible approach to the restoration of whitebark pine habitat is to mimic natural fire regimes.” (project file document 2-9-01).

Field reviews of wildfires in high elevations forests of the Selkirk Mountains during the past 60 years generated the following general conclusions. (project file Field Reviews – 1998)

1) Areas of lethal, stand-replacement fires that did not have an apparent whitebark pine seed source nearby had little to no evidence of whitebark pine regeneration and living trees were not producing cones. Such fires included Pass Creek Fire, August 1994; Ace Creek Fire, summer 1985; Mankato Fire, summer 1994; Spar Lake Fire, summer 1998; Scotchman Peak Fire, summer 1994.

2) An area of Fisher Peak, which is estimated to have burned in the 1940s or 1950s, is adjacent to the Fisher Peak Fire of August 1994. Within the older burn, several of the 3-5 inch and 5-inch plus diameter whitebark pine trees were producing cones and it was evident that the burn had successive plantings by Clark’s nutcracker. Within the 1994 fire area, scattered clumps and individual seedlings were found. It appeared that the adjacent stand of cone producing whitebark pine and maybe other trees further up the drainage are supplying an adequate seed source for Clark’s nutcracker. Continued plantings and seedling establishment are expected in portions of the burn that have good site preparation and little vegetative competition.

The field review summary outlined the need for adequate seed sources and reduced competition from alpine fir, grasses and shrub species as important factors in whitebark pine regeneration. The Fisher Peak sites were noted as appearing “... capable of regenerating naturally due to a major composition of whitebark pine... There appears to be enough seed source for the Clark’s nutcracker to reforest these areas with several plantings as the seed crop is available.” Areas identified as priorities were Trout, Fisher, Ball, and possibly Parker, Long Canyon, and Cutoff Peak.

Dennis Ferguson of the Forestry Science Laboratory also recognized the use of fire to create openings necessary for seed caching and establishment of whitebark pine. High priority areas for regeneration treatment are locations where whitebark pine is seral, because it is in danger of being crowded out by succession to shade-tolerant species. (project file *Strategies for managing whitebark pine in the presence of blister rust*, November 1999)

In *Whitebark pine ecosystem: the threats and challenges* (F. Reynolds, Intermountain Research Station) Intermountain research forester Steve Arno states that “...fire will have to be a major means of regeneration, particularly since clearcutting is inappropriate in most whitebark pine habitat. ‘... allowing selected lightning-ignitions to burn would be a positive first step, but it probably won’t be enough.” (project file)

A research proposal from scientists at the Rocky Mountain Research Station and Region One Forestry Sciences Laboratory (project file document 2-9-01) states, “To manage whitebark pine in the presence of blister rust, it becomes critical to address another major threat, fire exclusion. The most cost effective and ecologically responsible approach to the restoration of whitebark pine habitat is to mimic natural fire regimes. [Clark’s] nutcracker behavioral studies have shown that disturbances, such as fire, provide favorable areas for seed caching, and thereby facilitate regeneration of whitebark pine.” (page 2)

WBP-02 Comment: *The fact that the Clark’s nutcracker and the whitebark pine are considered coevolved and neither appear on any ESA, sensitive, or management indicator species list has implications for the adequacy of the Forest Plan and the Forest Service’s failure to design conservation strategies as their own policies require them to do.*

Response: The Northern Region’s 1998 *Northern Region Overview Focus on Ecosystem Health and Recreation* has identified whitebark pine as an “area at risk.” The whitebark pine ecosystem is identified as having a High departure from the historic range of conditions and High potential for protection or restoration opportunities. Loss is contributed to blister rust, fire exclusion and mountain pine beetle (Overview Summary, October 1998, page 13.) Whitebark pine is recognized as one of the plant communities most at risk in the Northwest Zone of the Northern Region (the Idaho Panhandle National Forest is within the Northwest Zone as described on page 31 of the Overview Summary).

Comments concerning wildlife, biodiversity

WL-01 Comment: The FS must be acutely aware that the things it is trying to save, i.e., caribou and grizzly bear habitat components, resilience of the forest to natural disturbances, etc. may also be threatened by the proposed activities.

Response: The US Fish & Wildlife Service concurs with the anticipated effects of this project on woodland caribou (not likely to adversely affect), Canada lynx (not likely to adversely affect) and grizzly bear habitat (not likely to adversely affect) (EA page A-2 and project file letter dated 4/09/04).

The whitebark pine ecosystem has become less resilient to natural disturbances, as described throughout the EA. (See responses to whitebark pine comments in letters 01, 02 and 03, for more information concerning these changes.) Chapter 4 details the anticipated effects on the various natural resources in the area. "...an active approach must be taken to conserve whitebark pine. The leave-alone policy would continue this species down the path of functional extinction over more and more of its range." (EA page 4-3) The forests would continue to lose ecological and structural diversity, and continue to trend the stands away from historical conditions.

"...all of the action alternatives provide much greater opportunity for restoration of whitebark pine than Alternative 1, No Action." (EA page 4-6) "[The alternatives] would help to return many acres of currently dysfunctional stands into young, healthy, stands of functioning whitebark pine." (EA page 4-11).

Potential short-term inconsistencies with recreation guidelines that are anticipated under the preferred alternative are justified and acceptable due to the integral part whitebark pine plays in the recreation values of the high elevation environments. (EA page 4-27)

"There would be no noteworthy direct, indirect, or cumulative effects that would degrade the watershed resources...in any of the alternatives. ...there are no cumulative effects to fish populations or their habitat with any of the action alternatives." (EA pages 4-71 and 4-72)

WL-02 Comment: The EA does not include an analysis of the lands in question as being potential critical habitat for the ESA-listed species that inhabit the area.

Response: Critical habitat analysis and determination is conducted by the U.S. Fish and Wildlife Service under direction of the Endangered Species Act. It is outside the scope of this project and the role of the U.S. Forest Service. The Fish and Wildlife Service has reviewed the project and concurs with the determination of effects (see response to WL-01 above).

Comments concerning wilderness

W-01 Comment: Our organizations fully support the Northern Rockies Ecosystem Protection Act (NREPA), a bill (H.R. 1105) currently before Congress that would protect the roadless lands in question as Wilderness. NREPA currently has 183 cosponsors in the House of Representatives. We expect that any authorized activities will not affect the wilderness characteristics nor will lessen the chances of the forest plan revision process recommending the areas for wilderness. Also, we note that the EA fails to look at unroaded lands adjacent to inventoried roadless for additions to the roadless inventory.

Response: See responses to Long Canyon comments in Letter 01 and Proposed Wilderness and Inventoried Roadless Areas in Letter 04.

As described in the comments on roadless areas, the U.S. Department of Agriculture is proposing a new rule concerning management of inventoried roadless areas.

The EA did look at the small portions of the project that would occur in adjacent unroaded lands (EA pages 3-51, 3-52 and 4-77 through 4-79). It is beyond the scope of this project to evaluate adjacent lands for possible inclusion in the roadless area inventory. This type of analysis and management direction is more appropriate at the Forest

Plan level.

Comments concerning recreation

R-01 Comment: The very high recreational value of these areas is yet another reason that the FS make sure it doesn't overstep its expertise in the area.

Response: Recreation opportunities and proposed wilderness areas were some of the alternative driving issues for this project (EA pages 2-3 and 2-4). Alternative 3 was designed, in part, in consideration of recreation issues (EA page 2-15). Alternative 4, the preferred alternative, was refined from Alternative 3 specifically to respond to concerns from individuals within the agency and from members of the public about any forest management within proposed wilderness (Management Area 11), which is recognized as having high recreation values (EA page 2-5). The preferred alternative is compatible with most goals and guidelines for recreation within the project area. While some short-term effects are inconsistent, the importance of maintaining the whitebark pine as part of the recreational experience in the Selkirks justifies these short-term deviations (EA pages 4-27 and 4-28).

The alternatives were designed through an interdisciplinary process that took a conservative approach from the very early stages of project development. The project includes measures to avoid or reduce impacts to many of the elements that are part of the recreation experience, including cultural resources, water quality and fisheries, and wildlife. Features were included for other resources that have a more subtle importance to recreation, such as noxious weed control, public health and safety, soils, and streamside vegetation. (EA pages 2-25 through 2-28)

Specific measures to reduce or avoid negative impacts on recreation included direction on the way slashing treatments would be implemented, guidelines for camping by work crews, and timing of management activities. (EA page 2-28)

Alternative 4, the preferred alternative, includes the same recreation features as Alternative 3, plus the additional benefits to recreation by dropping treatments in Long Canyon Creek. The 350-acre whitebark pine release cutting that would have encompassed Trout Lake and Trail #14 (Trout Lake and Big Fisher Lake) was not included. Potential impacts to Trail #27 were reduced by cutting back on treatments in the Fisher-Farnham area. Possible effects to Trails #286 (Myrtle Peak) and Trail #9 (Burton Peak) were eliminated by dropping treatments in the Myrtle Creek watershed. (EA page 2-15)

The original proposed action would have treated about 11,000 acres. It was not carried forward for three primary reasons, as follows:

- 1) in many of the proposed stands the majority of the whitebark pine were already dead and viable seed sources were too far away to guarantee successful regeneration;
 - 2) the remote locations of some areas would have created unacceptable logistical needs and had the potential for unacceptable impacts on recreational visitors; and
 - 3) effectiveness of prescribed burn treatments on northern exposures was questionable.
- (EA pages 2-6 and 2-7)

Alternative 2 was a modification of the original proposal, reducing the total area to be treated from 11,000 acres to about 7,266 acres due to concerns about treating some sites on northern exposures. (EA page 2-9)

Comments concerning fire management

FM-01 Comment: The fact that an unwise fire suppression policy is now seen as an ecological problem in the IPNF, combined with the fact that the FS apparently doesn't want to revisit the policy in the light of full scientific and public review, means that the proposed project may well not itself lead to restoring natural processes in whitebark pine ecosystems, that later vegetation manipulation would be seen as necessary as a response to continued fire suppression. That we might not expect the long-term and cumulative effects of such a management regime to be as disastrous to the ecosystems as the timber program may only be because there are no commodities to be extracted here.

Response: The decline of whitebark pine has been brought about by a combination of three factors – white pine blister rust, mountain pine beetle outbreaks, and fire suppression (EA pages 1-3, 1-4.) The management objectives and recommendations for whitebark pine communities in the project area include use of prescribed fire and mechanical activity to create relatively small openings adjacent to sources of white bark pine seed (EA page 1-6). “Prescribed burning and silvicultural treatments are now being used to restore whitebark pine ecosystems on National Forest lands throughout the northwest,” An Ecologist’s View of Whitebark Pine (D. Perkins, 2002. project file).

The IPNF is currently in the process of revising its Land and Resource Management Plan (Forest Plan). The revision effort includes evaluating areas where naturally ignited fires may be used for resource benefits.

See the response to Letter 04, comments WF-01 and WF-02 for more information.

Comments concerning roads

RD-01 Comment: *The EA does not fully consider the cumulative effects of roads and how they might create impacts on the whitebark pine ecosystem.*

Response: This project is located almost exclusively within the Selkirk Inventoried Roadless Area. It will not construct, reconstruct, or perform maintenance on any roads, temporary or permanent.

Letter 06 – Kootenai Environmental Alliance

Comments concerning water resources

WR-01 Comment: *On page 3-37 of the EA it was stated there are no 303(d) stream segments located within the Whitebark Pine area. Does the Whitebark Pine area described on page 3-37 encompass the total area that is included in the cumulative effects analysis area? If the Whitebark Pine area is not considered the cumulative effects analysis area, what is the size in acres of the cumulative effects analysis area?*

The Decision Notice should include information that will indicate whether there are any 303(d) water bodies located downstream of the Whitebark Pine cumulative effects analysis area.

Response: The water resources cumulative effects area encompasses about 135,000 acres of Parker, Trout, Fisher, Myrtle, Ball, Long Canyon, Smith, Lost, Clark, and Burton Creek watersheds; all tributary to the Kootenai River as shown in Figure 3-10 (EA pages 3-39, 3-41).

None of these streams or stream segments is currently listed for any water quality constituent on the 303d list (EA pages 3-37 and 3-42).