

APPENDIX: PUBLIC INVOLVEMENT

INTRODUCTION

The following comments were received from the time the *FEIS* was released and this decision was issued. Many were previously addressed in the *FEIS*, Appendix C, “Response to Comments”.

Table 0-1: Response to Comments concerning the Final Environmental Impact Statement

COMMENT (PARAPHRASED)	REFERENCE	RESPONSE
Tussock moths have evolved for thousands of years and are an integral part of the forest ecosystem. Spraying would disturb the natural balance that has existed without man’s help.	<i>FEIS</i> pp. I-4, III-5, IV Effects of Proposed Action (all sections), Appendix C-4	The natural role of DFTM in the ecosystem is recognized throughout the <i>FEIS</i> . Proposed treatment is limited to specific Areas of Concern as outlined in the project objectives. This decision protects 12% of the area that could be affected by DFTM. The remaining 88% would not be treated in case of a DFTM outbreak. The selected biological control agents occur naturally in the environment. Much of the project area is no longer in natural balance because of fire suppression and other activities.
Many trees and entire stands of trees recover from tussock moth infestations.	<i>FEIS</i> pp. IV-5 Analysis File – Forest Health: Wickman, 1963, 1978	It is true that some trees and some stands of trees recover from tussock moth defoliation. Some do not. For this reason, this decision focuses on those areas where defoliation and potential tree mortality would have negative effects on particular resources.
Concerned about the use of B.t.k. to insure corporate profits	<i>FEIS</i> pp. I-4	The purpose of this project is to protect those resources described in the Purpose and Need.
There is no reason to prescribe death to DFTM Region-wide.	<i>FEIS</i> pp. I-4: Table II-1, II-5: Table II-2, II-6	This decision will not stop or prevent the entire outbreak. This decision protects only 12% of the area that could be affected by DFTM; the remaining 88% would not be treated.
The <i>FEIS</i> is too general. Site-specific surveys and analysis are needed before spraying occurs (with respect to T&E species, sensitive species, MIS species, soil & water quality, stand structure, species composition).	<i>FEIS</i> Chapter III, Chapter IV, p. Appendix C-5 Analysis File: Forest Health maps and data; Fish and Wildlife maps and data	An adequate level of detail was used to make a reasoned analysis. Forest-level data was used to evaluate sites by level of risk, determined by stand composition, size class, and canopy closure. Information from Forest specialists about local conditions was incorporated into the analysis. As a result, specific sites were identified as potential Areas of Concern (areas that would be unacceptably degraded from defoliation) by the Forests. Areas were re-analyzed between the draft and final EIS. If during implementation, new information comes to light, this decision allows Forest Supervisors to recommend to the Regional Forester dropping an area from treatment.
The <i>FEIS</i> fails to disclose the viability of B.t.k.	<i>FEIS</i> pp. IV-39, Appendix B-4	B.t.k. is a viable, registered insecticide to suppress Douglas-fir tussock moth. It has been used successfully in the past. There is no reason to believe it will not be effective in the future.

COMMENT (PARAPHRASED)	REFERENCE	RESPONSE
Request for information on sticking agents used in the application of B.t.k.	<i>FEIS</i> pp. IV- 49 – IV-50, IV-56, Appendix C-10, Appendix H-5 Analysis File – Inert Ingredients	There are inert ingredients in B.t.k. products, but the information about them is proprietary. The inerts are on EPA list 3 or 4. The EPA information in addition to field studies, lab reports, and other existing information was used in the analysis to determine that inert ingredients would have minimal impact to the environment and human health.
Insect resistance to B.t.k.	<i>FEIS</i> pp. IV-40, Appendix B-6	Resistance is a recessive characteristic and is developed only through repeated successive exposure. This recessive characteristic will remain in the background in populations that have infrequent exposure (once every 7 to 8 years) to B.t.k., and that are subject to genetic mixing from untreated wild populations. Individuals that have resistant characteristics from B.t.k. often have an extended development, are therefore exposed to predators for a longer period, and are subsequently removed from the population by predators before they are able to pass on these characteristics.
There will be increased, unnatural amounts of virus in the soil [from spraying TM-BioControl].	<i>FEIS</i> pp. IV-40 – IV-41, Appendix B-7	The DFTM virus naturally exists in the environment for extended periods – thus it is able to survive from one DFTM outbreak to the next. Treatment will not result in increased, unnatural amounts of virus in the soil.
For TM-BioControl: request for information on sticker and Carrier 038. What are the known and potential, direct and indirect environmental effects of the sticker and Carrier 038?	<i>DEIS</i> p. III-52 <i>FEIS</i> pp. IV-50, Appendix C-10, Appendix H Analysis File: Inert Ingredients	Inert ingredients for Carrier 038 are proprietary information; however, all inert ingredients are on EPA List 4. List 4 ingredients are generally recognized as safe.
Natural processes – the role of DFTM in regulating encroachment and recruiting down wood and snags.	<i>FEIS</i> pp. II-6, III-27, IV 5-7, Appendix C-4, C-5 Analysis File: Forest Health	One alternative “not considered in detail” was to control the entire outbreak. The beneficial aspects of DFTM are recognized in the <i>FEIS</i> , which is why the entire outbreak is not proposed for treatment. Approximately 88 % of the host type will not be protected by this decision.
What are long-term management actions that will restore natural forest conditions?	<i>FEIS</i> pp. II-7, III-8, IV-6	Long-term forest management strategies (tree harvesting, thinning, forest planting, prescribed fire, etc.) are addressed in Forest Plans and other documents for specific areas and management objectives. These strategies are implemented on a site-specific basis with separate analyses. The Interior Columbia Basin Ecosystem Management Project (ICBEMP) recently released a draft EIS which documents options for long-term strategies; other strategies are discussed on p. III-8.

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Define “sub-outbreak” and “outbreak” levels. How they are determined?	<i>FEIS</i> pp. Appendix C-9, Appendix D-2	Appendix D describes on-the-ground larval and cocoon/egg mass sampling procedures, which are used to determine actual population levels within a specific area.
<p>Extent of damages:</p> <ul style="list-style-type: none"> • The <i>FEIS</i> misstates the emergency – the early 1970s outbreak resulted in only .025% mortality. • Many forest health consequences resulting from the No-Action alternative also apply to the Proposed Action and TM-BioControl Only Alternative. This leads the public to believe that consequences would be worse by not doing something about the DFTM. 	<i>FEIS</i> pp. IV 5 – IV-6	<p>In the 1970s, mortality also occurred in areas of severe and moderate defoliation (p. IV-5). About 13% of the total outbreak area experienced significant mortality. The concern evaluated in the current <i>FEIS</i> is not the impact on the overall landscape, but the effects of damage on specific Areas of Concern. The emergency applies only to the first year of implementation. Current information indicates there are Areas of Concern that will be severely defoliated in 2000.</p> <p>Areas not protected in the Proposed Action will experience the same effects as the No Action Alternative. Protecting Areas of Concern from DFTM defoliation will maintain existing conditions and habitats for the short-term until other actions can be taken to change stand conditions, if desired. The negative effects of defoliation in Areas of Concern are displayed in the No Action Alternative analysis. The Forest Service has decided to only treat specific Areas of Concern. There will not be “broad-scale, blanket spraying.”</p>
Anticipated outbreak is based on the “early warning system” – what are the results?	<i>FEIS</i> pp. III-27, Appendix C-9	The early warning system was developed to show trends in DFTM populations. In non-outbreak years, a high percentage of these traps catch few, if any moths. As stated in the <i>FEIS</i> , Appendix C, copies of the Early Warning System report are available upon request.
Does this document allow treating DFTM outbreaks more than once?	<i>FEIS</i> pp. I-3, IV-39 – IV-40, Appendix C-8	This decision is for the current outbreak only. Treatment may occur throughout the next five years (2000-2004) but not in the same places. Only one treatment per area will be necessary.
Funding for the project?	<i>FEIS</i> p. Appendix C-4	Funding for this project is outside the US Forest Service base budget but has been requested and approved.
<p>Monitoring:</p> <ul style="list-style-type: none"> • Only focuses on insects and defoliation • Should include control plots, T&E habitat, and effects on Lepidoptera. • Is there funding? 	<p><i>FEIS</i> pp. Appendix C-7, Appendix I</p> <p><i>ROD</i> p. 3</p>	The <i>FEIS</i> provides guidelines for treatment effectiveness monitoring. The <i>ROD</i> adds monitoring objectives. Funding is budgeted for monitoring in fiscal year 2000. Monitoring plans will be part of Project Operations Plans.

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Were the impacts of new suppression technologies analyzed?	<i>FEIS</i> pp. I-6	Mating disruption is the only other technology being considered. This <i>FEIS</i> did not analyze this approach. Any such actions will be considered separately – therefore, no areas or discussion were included in the <i>FEIS</i> .
Authority to spray outside of action alternative areas. Is there flexibility for “adaptive management”?	<i>FEIS</i> pp. II-7 – II-8 <i>ROD</i> p. 3	This decision will only protect identified Areas of Concern. No additional Areas of Concern can be added for protection without additional analysis, as required by NEPA. Flexibility is there in that the Forest Supervisor can make a recommendation to the Regional Forester to drop an area based on new information..
Explain “spray blocks could include some areas not specifically identified for protection”.	<i>FEIS</i> pp. II-7, II-8 <i>ROD</i> p. 3	For logistical and safety reasons, application of pesticides by helicopter in mountainous terrain may include small incidental areas not identified for protection but are too small to be missed by the pilot. Generally, such inclusions are irregularly shaped and a few acres in size. Conversely, small, isolated areas approved for protection could be excluded from spray delineation for the same reasons.
Old-growth/late old stand structure: <ul style="list-style-type: none"> • How do trees respond to defoliation by age and size? • Role of DFTM as a thinning agent. 	<i>FEIS</i> pp. IV 5 – IV-6, IV 9 – IV-11, Appendix C-5 Analysis File: Forest Health, pp. 8-10; Wickman, 1963, 1978	Small trees have higher direct mortality from defoliation; trees larger than 14” dbh have more mortality from secondary attack by bark beetles.
Late Successional Reserves: why doesn’t the <i>FEIS</i> provide a list of late successional species?	<i>FEIS</i> pp. III 5 – III-9, IV 7 – IV-11	This decision does not include any Forests with LSRs. A list of late successional species in each LSR is not required because potentially affected species were analyzed in the <i>FEIS</i> .
Fire – broad generalizations based on widespread outbreak; <i>FEIS</i> lacks site-specific information.	<i>FEIS</i> pp. III-9 <i>FEIS</i> pp. IV 11-12 Analysis File: Fire maps and data	There is no way to predict the extent of defoliation or specific future fire locations on a site by site basis. However, we can estimate impacts based on previous experience (1972/73 outbreak). Fire effects are analyzed on a landscape basis. Specific information on fuel types is found in the Analysis File.
Treatment in wilderness goes against the intent of designated wilderness	<i>FEIS</i> pp. IV-18, IV-60	There is policy which allows treatment in wilderness if an insect outbreak threatens a federally listed species. This decision allows one wilderness area to be treated, should it experience a DFTM outbreak. Protection will maintain the most critical spawning and rearing habitat for bull trout in the North Fork Umatilla watershed.

COMMENT (PARAPHRASED)	REFERENCE	RESPONSE
What is the rationale for treatment buffers?	<i>FEIS</i> pp. II-7, IV 19 – IV-27 Analysis File: Fish and Wildlife	The Northern Bald Eagle Recovery Plan establishes a ½mile radius buffer around bald eagle nests. Based on local conditions and discussions with USFWS, some Forests increased that buffer in their Forest Plans up to 1 mile. The <i>FEIS</i> used the radius identified in each Forest Plan. The standard, 1-mile buffer for peregrine falcon eyries was applied, per The Peregrine Falcon Recovery Plan.
Neo-tropical bird study plots should not be treated.	<i>FEIS</i> , p. IV-37 Analysis File: Fish and Wildlife	The PNW Forest Research Station scientist conducting the neo-tropical bird study has determined that treating plots with TM-BioControl within a 1-mile radius of these plots will not jeopardize the research data. B.t.k. will not be used within one mile of neo-tropical bird study plots. This will maintain baseline food sources of non-target Lepidoptera.
Drift	<i>FEIS</i> pp. II-7, IV-43, Appendix C-9, Appendix G-2 <i>ROD</i> p. 4	Effects of direct applications of both B.t.k. and TM-BioControl have been analyzed. Any effects from drift would be similar or less than the effects of direct application. Drift cannot be avoided. Operational guidelines will mitigate impacts from drift.
General T&E species habitat – the <i>FEIS</i> does not contain information on canopy closure and stand composition of nesting centers and riparian areas.	<i>FEIS</i> pp. IV-15 – IV-25 Analysis File: Fish and Wildlife	An adequate level of detail was used to make a reasoned analysis. Forest-level data was used to evaluate sites by level of risk, determined by stand composition, size class, and canopy closure. Information from Forest specialists about local conditions was incorporated into the analysis. As a result, specific sites were identified as potential Areas of Concern (areas that would be unacceptably degraded from defoliation) by the Forests. Areas were re-analyzed between the draft and final EIS.
Anadromous fish and bull trout habitat – what is the stand composition by species and canopy closure?	<i>FEIS</i> pp. IV-15 – IV-25 Analysis File: Fish and Wildlife	Stand composition and canopy closure were considered in the <i>FEIS</i> by their incorporation into levels of risk. Many streams were not included in the initial analysis because of these factors. Only those streams that Forest fish biologists felt could be degraded from defoliation were included. Forest biologists provided local, site-specific information for each stream. Streams that could be degraded by defoliation were identified as Areas of Concern.

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<p>The <i>FEIS</i> lacks crucial information about riparian vegetation, stream temperatures, and quality fish habitat. No information on stream temperatures of proposed streams.</p> <p>“Miles affected” does not adequately disclose the importance of reaches containing springs, alluvial deposits, etc.</p>	<p><i>FEIS</i> pp. II-9 – II-12: Table II-3, III-13 – III-14, IV 15 – IV-25</p> <p>Analysis File: Fish and Wildlife</p>	<p>Riparian vegetation, stream temperatures, and fish habitat quality were considered in the initial identification of Areas of Concern. Many streams have wide channels where riparian vegetation is not a significant factor in stream or fish quality. Many streams that would benefit from the DFTM outbreak due to an increase in downed woody material were never proposed for protection. These areas were analyzed in the <i>FEIS</i> in the No Action Alternative and in the “unprotected areas” of all other alternatives.</p> <p>Forest fish biologists considered many factors, such as channel morphology, and topography that affect stream temperature. Information on <i>303d</i> streams listed for temperature concerns can be found in the Analysis File or on forests.</p>
<p>Why treat so many anadromous/bull trout streams?</p>	<p><i>FEIS</i> p. II-9 – II-12: Table II-3</p> <p>Analysis File: Fish and Wildlife</p> <p>Biological Assessment</p> <p>USFWS Letter of Concurrence, 5/16/00</p>	<p>This decision will protect streamside Douglas-fir stands considered important or critical habitat for anadromous fish and bull trout. This decision will protect up to 404 miles of anadromous and 225 miles of bull trout streams. Please note that many bull trout and anadromous fish streams overlap. In addition, other resource areas in Areas of Concern include streams.</p>
<p>There will be impacts on rare and non-target Lepidoptera.</p>	<p><i>FEIS</i> III-26, IV 42 – IV-44, Appendix C-7, Appendix E</p> <p>Analysis File: Non-target Lepidoptera</p>	<p>B.t.k. will kill some non-target Lepidopteran larvae. TM-BioControl is specific to tussock moths. Effects from either biological control agent will be limited to treatment areas.</p>
<p>General comments on bird species – what are the effects of low-flying aircraft and dispersal habitat?</p>	<p><i>FEIS</i> pp. IV-15 – IV-27, IV-32 – IV-34, IV-36 – IV-37</p>	<p>Effects of low flying aircraft were analyzed for T&E, sensitive, Survey and Manage, and Management Indicator species. Management Indicator species are assumed to represent the general health and welfare of all species.</p>

COMMENT (PARAPHRASED)	REFERENCE	RESPONSE
<p>Northern spotted owl:</p> <ul style="list-style-type: none"> • Does not consider beneficial impacts of thinning; • Does not consider incidental take from aircraft disturbance • No spray buffer should be proposed • Surveys of suitable habitat to assess effects of this project • Effects determinations are not appropriate 	<p><i>FEIS</i> pp. III-22, IV-17 – IV-26 Biological Assessment</p>	<p>The three Forests with spotted owls are not included in this decision. Formal consultation with USFWS continues. These comments will be addressed in the Record of Decision to be issued for these forests.</p>
<p>Eye, skin, and respiratory irritation for both B.t.k. and TM-BioControl were not given enough consideration other than on humans.</p>	<p><i>FEIS</i> p. IV-56 Analysis File: Fish and Wildlife</p>	<p>Both B.t.k. and TM-BioControl have undergone acute toxicity tests, as required by EPA. These tests were done on rabbits, deer, mice, dogs, and ducks and included feeding, dermal, eye, and respiratory tests at extremely high concentrations. These animals are representative of wild species. Many potential effects on humans were determined by acute dose response to various animals.</p>
<p>Ungulates (Caribou):</p> <ul style="list-style-type: none"> • Canopy closure does not justify treatment. • No Action effects determination should be the same as the Proposed Action. 	<p><i>FEIS</i> pp. III 20 – III-21, IV 27 – IV-32 Biological Assessment USFWS Letter of Concurrence, 5/16/00</p>	<p>Caribou habitat was not identified as an Area of Concern. No areas will be treated to protect caribou habitat. However, effects on caribou habitat were analyzed for all alternatives. This decision will not affect caribou since there is no caribou habitat within potential treatment areas.</p> <p>Effects outside protected Areas of Concern will be the same as effects in the No Action Alternative.</p>

COMMENT (PARAPHRASED)	REFERENCE	RESPONSE
<p>Bald eagles:</p> <ul style="list-style-type: none"> • Eagles would benefit from defoliation. • The agency should survey for listed raptors during spraying season. • There should be varying horizontal buffers for known eagle nests. • Why are some nest sites protected and others not? 	<p><i>FEIS</i> pp. II-7, IV-19 – IV-20 Biological Assessment USFWS Letter of Concurrence, 5/16/00</p>	<p>The <i>FEIS</i> analysis determined some eagle nest stands would benefit from defoliation. Other nest stands would experience a negative impact from defoliation but the impact from spraying disturbance was determined to be greater than the impact from defoliation. This decision will not treat any bald eagle nest stands.</p> <p>Bald eagles are the only federally endangered or threatened raptors considered in this decision. All known eagle nests in the project area have been documented in the Analysis File. Surveys are done each year to determine new nest sites.</p>
<p>Lynx:</p> <ul style="list-style-type: none"> • Interfering with natural insect and role of downed wood/snag creation would have long-term adverse effects on lynx. • Request to change effects determination 	<p><i>FEIS</i> p. IV-27 Biological Assessment USFWS Letter of Concurrence, 5/16/00</p>	<p>Lynx habitat generally occurs at high elevation in lodgepole pine, Englemann spruce, and subalpine fir. Since it is unlikely that a DFTM outbreak will occur in these sites, they were not included in the analysis of proposed treatment areas. The analysis determination was “No Effect”; USFWS concurred with this determination.</p>
<p>Townsend’s big-eared bat:</p> <ul style="list-style-type: none"> • Spraying should not be allowed in roosting sites. • How will mitigation measures be implemented without surveys? 	<p><i>FEIS</i> p. IV-35 <i>ROD</i> p. 4 Analysis File: Fish and Wildlife</p>	<p>The 1.75-mile radius is the distance recommended by the US Fish and Wildlife Service. The USFWS letter provides an exception to avoidance in their recommendation, when treatment within the recommended buffer is vital to protect the area from landscape-level defoliation.</p> <p>Existing and potential maternity sites (whether occupied or not) will be surveyed prior to treatment where B.t.k. is proposed for use. This decision allows treatment with TM-BioControl only, around known or potential maternity sites. This will maintain a baseline level food source of non-target Lepidoptera for bats.</p>

COMMENT (PARAPHRASED)	REFERENCE	RESPONSE
<p>Grizzly bears:</p> <ul style="list-style-type: none"> • Bears will be disturbed from low-flying aircraft. • The <i>FEIS</i> does not disclose whether proposed treatment areas fall within grizzly bear recovery zones. • The army cutworm moth conclusion is flawed; the “No Effect” determination is not justified. • Habitat will be improved through defoliation. 	<p><i>FEIS</i> pp. III-21, IV-28 – IV-31, VI-56 Biological Assessment USFWS Letter of Concurrence, 5/16/00 Analysis Files: Fish and Wildlife, Non-target Lepidoptera</p>	<p>Disturbance from low-flying aircraft was considered in the “May Affect, Not Likely to Adversely Affect” determination; the USFWS concurred with this determination.</p> <p><i>FEIS</i> identifies areas on the Colville, Okanogan, and Wenatchee NF that have documented occurrences of grizzly bear or are in a Grizzly Bear Recovery Zone. The Okanogan and Wenatchee Forests are not included in this decision.</p> <p>Physiology and feeding habits of adult army cutworm moths do not make them susceptible to effects of B.t.k.</p> <p>In the <i>FEIS</i>, the No Action Alternative discloses the effects of defoliation. The Proposed Action analyzed the effects of treatment; effects on unprotected areas will be the same as those discussed for No Action.</p>
<p>Gray wolves: disturbance from low-flying aircraft</p>	<p><i>FEIS</i> pp. IV-28 – IV-31 Biological Assessment USFWS Letter of Concurrence, 5/16/00</p>	<p>Disturbance from low-flying aircraft was considered in the “May Affect, Not Likely to Adversely Affect” determination; the USFWS concurred with this determination.</p>
<p>Reptiles and Amphibians:</p> <ul style="list-style-type: none"> • What are the effects of B.t.k. on reptiles and amphibians? • The analysis for sensitive species is incomplete. • Use of chemical(s) must be thoroughly evaluated for effects on amphibians that breathe through their skins. 	<p><i>FEIS</i> pp. IV-33: Table IV-6, IV-56 Analysis Files: Fish and Wildlife</p>	<p><i>FEIS</i> analysis discloses effects on all Sensitive fish and wildlife species within the analysis area. B.t.k. is a bacterium and TM-BioControl is a virus; both are specific to Lepidopterans. Testing has indicated no effects on reptiles and amphibians. Inert compounds in the insecticides are classified by EPA as “generally recognized as safe” or “not classified”. According to the EPA, B.t.k. has not been observed to have negative effects on frogs and salamanders and is not believed to pose a hazard to these organisms.</p>

COMMENT (PARAPHRASED)	REFERENCE	RESPONSE
Plants: <ul style="list-style-type: none"> • All T&E and sensitive plants should be considered, with indications of their pollinators. • Pollinator biology is unknown for many species. • There should be a “no spray buffer” around showy stickseed because tussock moths could be a potential pollinator. 	<i>FEIS</i> pp. IV-44 – IV-48; Appendix C-9 Analysis File: Plants Biological Assessment USFWS Letter of Concurrence, 5/16/00	T&E and sensitive plants were considered by species and pollinator. In addition, factors such as time of flowering, habitat type and range, and lifecycle of species (annual, biennial, or perennial) were considered in making effects determinations. In some cases, pollinator biology was unknown. Many plants with unknown or suspected Lepidopteran pollinators occur outside the analysis area. Tussock moths are extremely uncommon during non-outbreak years and would not be a primary pollinator for any plant. Showy stickseed plants have only been found on the Wenatchee Forest; this Forest is outside the scope of this decision.
Need site-specific analysis of all areas for tree species composition.	Analysis File: Forest Health maps and data	An adequate level of detail was used to make a reasoned analysis. Forest-level information on tree species composition was used in the analysis.
Only TM-BioControl should be used.	<i>FEIS</i> p. II-6, Appendix C-7 <i>ROD</i> pp. 3 – 4 Analysis Files	This decision stipulates that TM-BioControl will be used as supplies allow. In 2000, only TM-BioControl will be used.
Many plant species rely on Douglas-fir tussock moth as a pollinator.	<i>FEIS</i> pp. III-26 – III-27, Appendix C-9 Analysis File: Plants	Douglas-fir tussock moth outbreaks occur infrequently, with the insect at extremely low levels between outbreaks. DFTM males are not a primary pollinator of any plant.
National and international cumulative effects should be discussed.	<i>FEIS</i> pp. IV-60 – IV-63	Effects of treatment would be limited to treatment areas. National and international effects are beyond the scope of this analysis.
DFTM helps partially defoliated trees survive droughts.	<i>FEIS</i> p. Appendix B-1 Analysis File: Forest Health p.10; Wickman, 1963.	The objective of the Proposed Action is to prevent the level of tree mortality that results from heavy defoliation characteristic of outbreak conditions. Partial defoliation does result in substantial changes in tree physiology for several years, including changes in needle photosynthesis and reduced carbon demand for plant growth. Temporary increases in drought resistance are not part of the Purpose and Need.
DFTM are important prey for birds, fish, frogs, and others.	<i>FEIS</i> p. IV-58, Appendix C-6	DFTM occurs infrequently at high levels. Under non-outbreak conditions, it would not be a significant food source for wildlife. During outbreak conditions, wildlife would benefit from opportunistic feeding.