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Northern Region

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Fire Management Amendment
to the
Gallatin National Forest Plan

Decision Notice
and
Finding of No Significant Impact (FONSI)
and Finding of No Significant Amendment

USDA Forest Service - Gallatin National Forest

**Gallatin, Park, Sweet Grass, Madison
and Meagher Counties in Montana**

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Fire Management Amendment to the Gallatin National Forest Plan

Decision Notice

Background

Beginning in 2006, the Gallatin National Forest began a programmatic review of the 1987 Forest Plan direction for management of unplanned wildland fire events, and found the Forest Plan (FP) inconsistent with federal fire management policies since 2001. The FP provides direction and guidance that reflected federal fire management policies in place at that time. It describes fire suppression strategies as the primary response strategy available to Forest Service managers, thus limiting the flexibility of managers to consider more appropriate options to manage unplanned wildland fire.

The *1995 Federal Wildland Fire Management Policy and Program Review* (USDA Dec 1995) recognized that the exclusion of fire has resulted in dramatic changes in expected fire behavior in rangeland and forested ecosystems. It emphasizes the need for integration of fire into land management planning and implementation, as well as the involvement of all affected landowners and stakeholders. Federal land management agencies have operated within this policy since its adoption. Operational clarification and continuing guidance supporting implementation of this policy was issued in 2003, 2008 and 2009.

The Gallatin National Forest decided to update the 1987 Forest Plan direction for fire management for several reasons: the recent changes in national fire management policies; recognition of the role of wildland fire as an essential ecological process and natural change agent on the landscape; the increased fire activity in recent years; and provide opportunities to reduce costs associated with wildland fire management by not implementing full fire perimeter control tactics where it is not needed.

Decision

After careful consideration of the alternatives considered in detail and the environmental effects analyses displayed in the Fire Management Amendment to the Forest Plan Environmental Assessment (May 2011), (hereinafter referred to as the "EA"), as well as the public comments received on the EA, I have decided to implement **Alternative 2**, which amends the 1987 Forest Plan management direction, standards and guidelines pertaining to unplanned wildland fire. My decision also incorporates the fire and fuel standards currently found in the two wilderness fire management guidebooks as the fire standard direction pertaining to the use of prescribed fire within MA 4. The amendment only applies to National Forest System lands under the management of the Gallatin National Forest in Gallatin, Park, Sweet Grass, Madison and Meagher counties in Montana.

Alternative 2 will replace fire management standards specific to each management area with **Forest-wide standard** as follows:

Fire: One or more fire management strategies may be considered and implemented for any unplanned wildland fire to achieve a variety of resource management objectives, while minimizing negative effects to life, investments and valuable resources.

Alternative 2 replaces the fire standard found in the 1987 Forest Plan pertaining to the use of prescribed fire within MA 4, which states - *The use of scheduled prescribed fire in wilderness will be consistent with National Forest policy* (FP, p. III-12), with the more detailed prescribed fire and fuel management guidelines outlined in the Forest Service Manual 2324.2 and the two wilderness fire management guidebooks, which are already in practice (EA, p. 16), as follows:

The objectives of fuel treatments within MA4 would include:

- Permit fire to play, as nearly as possible, its natural ecological role on the landscape.
- Reduce, to an acceptable level, the risks and consequences of wildland fire within wilderness or escaping from wilderness.
- Allow fire to move into and out of wilderness boundaries as necessary based on the historic burning patterns, ecological health, impacts to abiotic and biotic components of the wilderness.

The acceptable methods of fuel management treatment that may be used to reduce the risk to these protected areas include:

- Planned ignition and/or mechanical fuel manipulations outside of wilderness boundaries.
- Planned ignitions outside of wilderness boundaries that burn into wilderness where wilderness management objectives and conditions are met.
- Planned ignitions inside of wilderness boundaries that burn out of the boundary where wilderness management objectives and conditions are met.
- Planned ignitions within the wilderness boundary where wilderness management objectives and conditions are met.

(Taken from the AB Wilderness Fire Management Guidebook (1993), p. 49 and Lee Metcalf Wilderness Fire Management Guidebook (1997), p. VI-1)

The sole reason for this action is to eliminate the need for two stand-alone wilderness fire management guidebooks; thus inserting/combining that information formally in the FP through the fire management amendment effort.

The fire management amendment updates the fire management terminology found throughout the 1987 FP, including the glossary, and better reflects the most current Forest Service policies for fire management (EA, chapter 1, section 1.2(D)).

Alternative 2 eliminates the outdated information provided in the FP "Fire" Appendix E, and formally removes this appendix from FP direction.

Rationale for the Decision

By adopting Alternative 2, several objectives will be met. First, this action will update the 1987 Forest Plan (FP) direction to better meet current and future federal wildland fire management policies. Second, the amendment will allow fire managers the opportunity to consider and use a variety of fire management response strategies for unplanned ignitions on all National Forest System lands administered by the Gallatin National Forest. Third, when conditions are appropriate, an unplanned wildland fire (or portions of that fire) could be used to achieve resource management objectives as specified in the FP. It will allow fire managers to consider annual and long-term variations in weather patterns, ever-changing fuel conditions and expansions of urban development into the forest interface. And finally, this effort will better align the Gallatin National Forest's wildland fire management objectives with those of our neighboring Greater Yellowstone Area (GYA) national forests and national parks. The amended direction will expand opportunities for coordination, collaboration and management of wildland fire events occurring along administrative boundaries with our GYA partners.

As disclosed in the Finding of No Significant Impact (DN, FONSI Appendix A), the environmental effects of implementing Alternative 2 would not be significant. The amendment is a programmatic action that is not directly related to a specific project, nor authorizes vegetation treatments or ground-disturbing actions. It applies to unplanned, naturally-ignited (lightning-caused) wildland fire. Actions allowed under the amendment would continue to be constrained by federal wildland fire management policy directions and implementation compliance processes already in place.

There would be no changes to individual FP management area goals with this decision; only an update to the fire standards, which would be applied to all management areas. Fire management strategies and decisions would continue to be responsive to the goals and objectives described for each management area as specified in the FP. There is no change in the desired future conditions, land allocations, resource management directions or goods and services specific to other resource management areas.

Therefore, implementing Alternative 2 would result in a non-significant amendment to the FP, pursuant to 36 CFR 219.10(f) and Forest Service Handbook 1909.12. This decision meets the requirements under the National Forest Management Act of 1976 and regulations found under 36 CFR 219.

Importance of the Decision

The amendment clarifies previous unclear Forest Plan (FP) fire management direction for unplanned wildland fire. The fire management amendment will align the FP with the language and intent of the Federal Wildland Fire Management Policy (USFS/USDI 2009a). It will allow the Gallatin National Forest to take full advantage of this policy, and provide better and more efficient management of the Forest resources.

The amendment will provide managers the ability to use fire as a resource management tool outside of wilderness areas. Currently managers have the ability to use prescribed fire in these areas, but not lightning-caused fires. Determinations on how to manage fires will be made on a case-by-case basis depending on location, predicted weather, availability of firefighting resources, local conditions and what ecological benefits might be gained by a fire in a certain area.

Local fire managers will continue working closely with state, federal and county partners to determine how best to manage a fire.

The amended fire management direction applies to the management of **unplanned, naturally-caused fires only**. There will be no change to the management of unauthorized human-caused fire. In compliance with the Federal Wildland Fire Management Policy (*Ibid.*), all human-caused wildland fires would continue to be suppressed at the lowest costs, with the fewest negative consequences with respect to firefighter and public safety.

Other Alternatives Considered

Along with Alternative 2, another alternative was considered in detail - Alternative 1, the no action alternative. Alternative 1 is the 1987 FP direction which guides management of wildland fire using suppression strategies (control, confine, contain) within all management areas outside of designated wilderness. These standards do not necessarily allow fire managers the ability to consider variations in short and long-term weather patterns, fuel conditions or recent fuel management actions. The 1987 FP direction for fire management limits opportunities to allow a lightning-caused fire to play its role on the landscape or to be used as a tool to achieve resource objectives outside designated wilderness areas.

The Absaroka Beartooth Wilderness and Lee Metcalf Wilderness fire management guidebooks (1993 and 1997, respectively), which provide the fire management standards for the FP Management Area 4 (wilderness areas and recommended wilderness areas), are outdated in terms of weather data and

fuel conditions, as well as the current Federal policies regarding decision criteria and documentation processes. Under the Alternative 1, a separate update to the wilderness fire management guidebooks would still be needed in order to better reflect current Forest Service policies.

The 1987 FP direction for fire management is inconsistent with that of most Greater Yellowstone Area (GYA) national forests and national parks which have already amended their forest and land management plans to reflect the current federal fire management policies. Alternative 1 (no action) limits opportunities for coordination, collaboration and management of wildland fire (both unplanned and planned ignitions) occurring along the administrative boundaries with GYA partners.

The information displayed in the FP Fire Appendix E (FP, p. E1-E4) would continue as part of the FP document under Alternative 1 (no action). However, the information and guidance it provides has been outdated for many years.

There were two additional alternatives not considered in detail:

An alternative that would maintain Forest Plan fire management direction for certain management areas. The Forest's leadership, along with fire and resource managers contemplated the need to exclude some Management Areas from the proposed amendment; thus maintaining the 1987 FP fire management direction for these areas. These included the suitable timber management areas (MA 8, 10, 11, 13), and the developed recreation sites, administrative sites, mining sites and electrical corridors management areas (MAs 1, 2, 24, 25 and 26). After reviewing the public comments received during the initial project scoping effort, the decision was made that the full range of fire management response strategies should be considered on all NFS lands throughout the Gallatin National Forest, but with the caveat that response strategies provide firefighter and public safety at all times, evaluate values at risk, and be guided by the specific management area goals and objectives as described in the 1987 Forest Plan.

An alternative that would revise the entire Gallatin National Forest Plan. One public comment, received during the scoping period, requested an entire Forest Plan revision be performed instead of a specific amendment for fire management direction. The same organization, along with two others, repeated this request in their comments to the EA. As mentioned in Chapter 1 (section 1.4), the National Forest Management Act (NFMA) has provisions that allow for amending Forest Plans [16 USC 1604(f)(4), 36 CFR 219.10(f), 1982], that states the Forest Supervisor may amend the Forest Plan. Upon review of the amendment direction provided in 36 CFR 219.10(f), as well as the comments received from interested publics, other agency fire management partners, and the resource analyses provided, I have concluded that an amendment addressing needed changes and updates to the current Forest Plan direction for fire management is appropriate and can be performed in an appropriate timeframe, versus an entire Forest Plan revision, which would take years to complete.

Public Involvement

The initial public scoping period occurred from May 14 to June 4, 2009, with mailings sent to approximately 250 individuals, federal, state and local government agencies, tribes and other organizations. Information on the proposed amendment has been available on the Gallatin National Forest website under the Projects and Programs section. In that initial scoping effort, two comment letters were received.

Several meetings with other federal agencies, State, county and local area fire management partners and cooperators occurred prior to and since the May 14, 2009 scoping announcement, with the goal of determining any issues or concerns these partners may have with the proposed amendment. Their primary concern centered around whether the proposed amendment would result in changes to fire management coordination when fires move from National Forest System lands onto State or private lands. Gallatin National Forest fire managers have discussed the proposed amendment with GYA fire

organizations, and they are supportive of the proposed amendment, because it would better align the Gallatin National Forest with fire management strategies already in place on most GYA national forests and national parks.

Approximately 300 public notices were mailed to a variety of individuals, organizations and federal agencies, notifying them of the availability of the Fire Management Amendment environmental assessment document. The EA document was also available on the Gallatin National Forest webpage. The EA comment period occurred from May 5 through June 6, 2011. Comments were submitted either electronically or postal mailed.

Seven comment letters were received, with comments and requests for additional information varying by the respondent's interests. Some letters linked the plan amendment to logging, prescribed burning, grazing and road construction concerns. Many of these comments were not directly applicable to the proposed amendment to update fire management direction in the Forest Plan. This Fire Amendment EA does not authorize nor promote logging, specific fuel reduction activities or road building.

There were requests for full disclosure of the cumulative effects of implementing the proposed amendment as it relates to vegetation treatments, ground-disturbing actions, prescribed burning and road construction. Since this Plan Amendment does not recommend or authorize any specific action, I found these comments to be outside the scope of this analysis. Since unplanned wildland fire is both inevitable and unpredictable, the EA provides general discussions of the direct, indirect and cumulative effects of an unplanned wildland fire in Chapter 3.

In several letters, there were comments requesting detailed environmental analyses related to resources in general and the associated cumulative effects. Again, where the cumulative effects of unplanned wildland fire could be addressed, we have done so in this EA. However, it is important to recognize that this Plan Amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide the fire manager with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire.

All correspondence is retained in the project file. The Forest's response to those comments are included as in this DN/FONSI as Appendix B.

Findings Required by Other Laws, Regulations and Policies

As the Responsible Official for this project, I have decided to implement the amendment to the 1987 Forest Plan regarding the management of unplanned wildland fire. I have, therefore, selected Alternative 2 in its entirety, as described in the Fire Management Amendment to the 1987 Forest Plan EA. My decision is consistent with the laws, regulations and agency policies related to this fire management amendment as follows:

National Forest Management Act of 1976 - *Finding of Non-Significant Amendment*

The NFMA regulations contain provisions that allow for amending Forest Plans [16 USC 1604(f)(4), 36 CFR 219.10(f), 1982]. For amendments, the NFMA regulations require the deciding official to determine whether the amendment would result in a significant change to the Forest Plan based on an analysis of the objectives, guidelines and other contents of the Plan.

The Forest Service Handbook, FSH 1909.12(5.32) provides a list of factors to be considered in making the determination to amend the Forest Plan or not. They include: timing; locations and size; goals, objectives and outputs; and management area prescriptions.

The National Forest System Land Management Planning Rule (2000) at 36 CFR 219, including its transition provisions as amended in 2002 and 2003 and as clarified by interpretative rules issued in 2001 and 2004, are currently in effect. The transition provisions allows for use of the 1982 Planning

Rule to amend or revise Forest Plans. Under the 1982 Rule, amendment procedures can be found at 36 CFR 219.10(f) and state:

“Amendment. The Forest Supervisor may amend the Forest Plan. Based on an analysis of the objectives, guidelines and other contents of the Forest Plan, the Forest Supervisor shall determine whether a proposed amendment would result in a significant change in the plan. If the change resulting from the proposed amendment is determined to be significant, the Forest Supervisor shall follow the same procedure as that required for development and approval of a Forest Plan. If the change resulting from the amendment is determined not to be significant for the purposes of the planning process, the Forest Supervisor may implement the amendment following appropriate public notification and satisfactory completion of NEPA procedures.”

It is my finding that the actions of this decision comply with the requirement of the National Forest Management Act of 1976 and its implementing regulations in 36 CFR 219. This amendment is being made primarily in response to new federal fire policy. I followed direction found in 16 USC 1604(f) (4), 36 CFR 219, Forest Service Manual 1922.5, and Forest Service Handbook 1090.12(5.32) and determine this is not a significant amendment to the Forest Plan because it does not meet the required definition of significance found in Forest Service Handbook 1909.12 (5.32). Those factors are:

Timing. The Forest Plan was signed in 1987 and is well outside the original planning period. This amendment will be in effect until Forest Plan revision which is unscheduled at this time.

Location and size. The amendment covers all National Forest System lands located within the Gallatin National Forest (approximately 1,816,030 acres).

Goals, objectives, and outputs. This amendment will not significantly alter the long-term relationship between multiple use goals and objectives in the Forest Plan. No changes in the levels of goods and services provided by the Forest Plan are expected.

Management prescription. Fire management prescriptions/standards specific to each management area will be replaced with **Forest-wide Fire standard** as follows: *One or more fire management strategies may be considered and implemented for any unplanned wildland fire to achieve a variety of resource management objectives, while minimizing negative effects to life, investments and valuable resources.* Management prescriptions for unplanned wildland fire will continue to be guided by the management area goals, desired conditions, direction, standards, and guidelines. Implementation direction in Appendix E (FP, p. E1-E4) will be replaced by the annual fire management plan and the more current budget and organization analysis processes, such as the Fire Program Analysis. The changes in fire management actions of this amendment will not alter the desired future condition of the land and resources, but provide managers with the flexibility to meet those conditions.

The amendment will also replace the fire standard found in the 1987 Forest Plan pertaining to the use of prescribed fire within MA 4, which states - *The use of scheduled prescribed fire in wilderness will be consistent with National Forest policy* (FP, p. III-12), with the more detailed prescribed fire and fuel management guidelines outlined in the two wilderness fire management guidebooks, which are already in practice (EA, p. 16).

Based on review of the Environmental Assessment and supporting documents and considering the above guidance and findings, it is my determination that this amendment does not result in a significant change to the forest plan and is therefore a non-significant amendment.

Compliance with the Gallatin Forest Plan -

My decision to amend Forest Plan direction, standards, and guidelines pertaining to management of unplanned wildland fire is consistent with the intent of the Forest Plan's long term goals and

objectives. There would be no change to individual FP management area goals with my decision to adopt Alternative 2; only an update to the fire standard which would be applied to all management areas. The fire management strategies and decisions would continue to be responsive to the goals and objectives described for each management area.

Compliance with National Environmental Policy Act (1969, as amended) -

The process followed to create this Environmental Assessment and the supporting documents found in the project file, comply with NEPA direction required under 40 CFR 1500. According to 40 CFR 1508.9 “Environmental Assessment: (a) Means a concise public document for which a federal agency is responsible that serves to: (1) Briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact statement” (b) Shall include brief discussions of the need for the proposal, of alternatives as required by section 102(2)(E), and a listing of agencies and persons consulted.

“(a) As part of the scoping process the lead agency shall (3) Identify and eliminate from detailed study the issues which are no significant or which have been covered by prior environmental review, narrowing the discussion of the issues in the statement to a brief presentation of why they will not have significant effect on the human environment or providing a reference to their coverage elsewhere (40 CFR 1501.7)”. This EA analyzed a reasonable range of alternatives: the no-action and the proposed amendment, along with two other alternatives that were not considered in detail (EA, p.15-19). The analysis disclosed the expected impacts of each alternative and various issues and concerns raised by the interdisciplinary team member (EA, Chapter 3).

The NEPA requires public involvement and consideration of potential environmental effects. Appendix B of this Decision document provides all comments received on the EA and the Forest’s response to those comments. The entirety of documentation for this analysis supports compliance with this Act.

The primary purpose of the EA is to provide sufficient evidence for determining whether to prepare an environmental impact statement or a finding of no significant impact (40 CFR 1508.9). To determine whether there may be significant impact, NEPA require consideration of predicted impacts in terms of both context and intensity (40 CFR 1508.27). Refer to the NFMA compliance in this section for details on the finding of no significant amendment, as well as Appendix A, Finding of No Significant Impact (FONSI).

Sensitive Species (Forest Service manual 2670) -

The manual direction requires analysis of potential impacts to sensitive species, those species for which the Regional Forester has identified populations viability is a concern. Potential effects of this decision on sensitive species have been analyzed for terrestrial wildlife species (Canfield and Swilling 2010), fish, amphibians and aquatic resources (Barndt 2010) and sensitive plants report (Feigley 2010). Alternative 2 as proposed would have “no impact” or minor impacts on individual sensitive species (EA, p. 46-51, 59-69, and 89-92).

The results of the Biological Evaluation for terrestrial wildlife species indicate there would be “no impact” to Flammulated owl, trumpeter swan and harlequin duck. The evaluation found for all other sensitive species listed for the Gallatin National Forest a “may impact individuals or habitat, but will not likely contribute to a trend towards listing or loss of viability to the population or species” (EA, p. 68-69).

For aquatic species, there would be “no impact” to or a “beneficial effect” to fluvial arctic grayling, westslope cutthroat trout and Yellowstone cutthroat trout, boreal toad, northern leopard frog and Plains spadefoot, and the western pearlshell mussel.

None of the sensitive plant species listed for the GNF respond negatively to fire, including the soon-to-be-designated whitebark pine (refer to the attached Addendum document, September 2011). Most of

the sensitive plants listed in Region One that are known or suspected to occur on the Gallatin Forest are either “Tolerant of fire” or have a “Neutral response to fire”. The where, when, and to what degree are questions the answers of which cannot be predicted with any accuracy. It is unlikely that any fire would have any effect on the viability of individual plant species designated as sensitive.

Fire impacts to species will not vary under either alternative, but the opportunity to benefit species will vary. Fire will continue to be a part of the landscape under either alternative. It is not possible to predict size or intensity of fires nor the effectiveness of fire suppression actions. Selection of the proposed action will provide greater flexibility to manage habitat to benefit ecosystems and the species inhabiting them. Protection measures for individual species would remain in effect under either alternative.

Endangered Species Act (16 USC 1531 et.seq) -

A biological assessment for the amendment action was prepared as required by the Endangered Species Act, Section 7. I have reviewed the biological assessment prepared for this EA and the US Fish and Wildlife Service concurrence letter. While the USFWS agreed with the “may effect, not likely to adversely affect” determination for grizzly bear, Canada lynx and designated critical lynx habitat, the US FWS also agreed with Forest biologists that the proposed action is not likely to adversely affect these species.

Clean Water Act and Montana State Water Quality Standards -

Because it is impossible to predict where an unplanned ignition will occur, fire impacts to water quality will not vary under either alternative (EA, p. 43-51). I have reviewed the water quality analysis, and find that Alternative 2 would provide better opportunities to protect water quality through a variety of fire management options.

Clean Air Act -

In terms of air quality, there is not a significant difference between current fire management direction found in the 1987 FP (Alternative 1) and the changes being proposed in this amendment (Alternative 2). When managing an unplanned wildland fire for resource objectives, the Montana air quality laws and regulations must be met, as with prescribed burning operations. Smoke generated from wildland fires managed under either alternative would be managed to the extent possible to be consistent with National Ambient Air Quality Standards (NAAQS) and the Gallatin Forest Plan direction, recognizing that at times, robust wildland fires may exceed the PM2.5 standard. Any unwanted wildland fire would be suppressed to the best of the local unit’s abilities, limiting smoke as much as possible in an emergency situation. Impacts to air quality are not expected to increase beyond what is currently allowed under law.

Migratory Bird Treaty Act -

The proposed action is consistent with the Migratory Bird Treaty Act and the 2001 Executive Order outlining responsibilities of federal agencies to protect migratory birds. I find that Alternative 2 complies with this Executive Order.

Environmental Justice 12898 -

No impacts to minority or low-income populations were identified during scoping, the public comment period or effects assessment pertaining to the EA.

National Historic Preservation Act, American Indian Religious Freedom Act and Native American Graves Protection and Repatriation Act -

Upon review of the EA (p. 108-110), I have determined that the evaluation of the alternatives was performed in full compliance with direction from the Gallatin national Forest Plan (II-3, II-17), the National Historic Preservation Act (Section 106-36 CFR 800.1) and the American Indian Religious

Freedom Act. For large or complex undertakings, such as a wildland fire, where effects cannot be fully determined in advance, the implementing regulation for Section 106 allow agencies to develop programmatic procedures and to implement phased compliance programs (36 CFR 800.13(a)). All fire management decisions will be processed through the National Wildland Fire Suppression and Rehabilitation Protocol addendum to the Programmatic Agreement Among The United States Department of Agriculture, Forest Service, Northern Region (Montana), the Advisory Council on Historic Preservation, and the Montana State Historic Preservation Officer Regarding Cultural Resources Management on National Forests in the State of Montana provides direction on procedures and compliance regarding cultural resources in wildland fire situations. Native American communities have been contacted and public comment encouraged.

Administrative Review or Appeal Opportunities

This decision is subject to appeal pursuant to 36 CFR 217.3. A notice of appeal must be in writing and clearly state that it is a Notice of Appeal being filed pursuant to 36 CFR 217.

A written appeal must be filed within 45 calendar days following the publication of the legal notice of this decision in the Bozeman Daily Chronicle, Montana. It is the responsibility of the appellant to ensure their appeal is received in a timely manner and meets the content requirements of 36 CFR 217.9. 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. Mary E. Erickson, Forest Supervisor, Gallatin National Forest, is the Responsible Official.

Paper appeals must be submitted to

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

Electronic appeals must be submitted in MS Word, Word Perfect or Rich Text Format (RTF) 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.

Implementation Date

This amendment will be implemented 7 days after the legal notice of the decision has been published, and the appeal period has begun.

Additional Information and Contacts

The Fire Management Amendment to the Gallatin National Forest Plan EA, Decision Notice and Finding of No Significant Impact (FONSI) are available at the Gallatin National Forest, Supervisor's Office in Bozeman, Montana, or on the Internet at <http://www.fs.fed.us/r1/gallatin> in the Land and Resource Management area, Projects and Plans page. For additional information or questions concerning this Decision or the appeal process, please contact Julie Shea, Interdisciplinary Team Leader at 406/587-6706.



MARY E. ERICKSON
Forest Supervisor

9/22/11
Date

APPENDIX A

Fire Management Amendment to the Gallatin National Forest Plan Finding of No Significant Impact

After considering the environmental effects described in the Environmental Assessment, I have determined this amendment will not have a significant effect on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27). Therefore, an environmental impact statement will not be prepared. I base my finding on the following:

1. **Impacts that may be both beneficial and adverse.** The proposed management action does not cause significantly adverse impacts (EA, Chapter 3 - *Affected Environment and Environmental Consequences*). The decision updates fire management direction in the Forest Plan to reflect federal wildland fire policy. The amendment is a programmatic action that is not directly related to a specific project and does not authorize ground-disturbing actions.
2. **The degree of effect to public health and safety.** There will be no significant effects on public health and safety. This decision provides programmatic direction to be applied to unplanned wildland fire. Part of the decision on how a fire will be managed requires the agency administrator and fire managers to determine if there are any significant health and safety issues (EA, p. 8).
3. **Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farm land, wetlands, wild and scenic rivers or ecologically critical areas.** This action has no effect on unique characteristics of the geographic area (historic, cultural resource, park land, prime farm lands, wetlands, or wild and scenic rivers). The proposed management direction does not alter the environmental protection afforded such unique lands as already provided in the Forest Plan and may provide improved protection for such resources. There will be no significant effects on unique characteristics of the area, because site-specific features such as cultural sites and ecologically critical areas would be evaluated once an unplanned ignition is detected (EA, p. 94-102 and 108-110). An important process in determining how to best manage the fire includes developing mitigation measures that minimize negative effects to these unique characteristics, when possible.
4. **The degree to which the effects on the quality of the human environment are likely to be highly controversial.** The effects on the quality of human environment are not likely to be highly controversial because there is no effect on the human environment. The changes in fire management direction would help move towards the Forest Plan's desired future conditions.
5. **The degree to which the effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.** The effects of the amendment action are not highly uncertain, nor do they involve unique or unknown risks. The best available scientific information provided the foundation for designing the proposed management direction (EA, p. 112-120). Resource specialists did not identify any unique or unknown risks associated with this project as indicated in their individual reports (EA, Chapter 3, p. 33-111). Furthermore the public did not identify any substantial risks associated with this project (DN, Appendix B - *Response to Comments*). Management direction is consistent with current federal wildland fire policy. Furthermore, the Gallatin National Forest has had a substantial fire management program since 1988, experiencing more than 10 large fires and prescribed burning 200 to 6,000 acres annually.
6. **The degree to which the action may establish a precedent for future action which significant effects or represents a decision in principle about a future consideration.** This amendment action is not unique or precedence setting. Most federal partners within the Greater Yellowstone Area (GYA) have in-place the fire management strategies being described for this amendment (EA, p. 8-9). My decision to implement the amendment will better align the Gallatin National Forest's

- wildland fire management strategies with neighboring GYA national forests and national parks. This action will be in effect until Forest Plan revision which is unscheduled at this time.
7. **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.** The amendment updates the 1987 Forest Plan to current National Fire Management Policies for managing unplanned wildland fire. There are no ground-disturbing actions being proposed. Even though cumulative effects were discussed in each resource topic in Chapter 3, they are difficult to define and discuss because unplanned natural ignitions are inevitable and unpredictable. However, cumulative effects are expected to be less under the proposed amendment because other fire management strategies could be considered, not just suppression actions. A wide range of activities on and off the Forest contribute to cumulative effects, primarily livestock grazing, vegetation management, and recreation use. Wildland fire management activities would not add appreciably to cumulative effects from these other activities. No additional actions were identified that when combined with the proposed action would cause significant cumulative impacts.
 8. **The degree to which the action may adversely affect on districts, sites, highways, 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 historical resources.** The action contains standards and guidelines that protect cultural and archeological resources (EA, p.108 - 110). The amendment (Alternative 2) has been reviewed and supported by the Montana State Historic Preservation Office. The amendment action will not cause loss or destruction of significant cultural or historical resources because adoption of wildland fire management policy is not considered an undertaking as defined in the National Historic Preservation Act regulations. Accordingly, the amendment will have no direct effect on heritage resources.
 9. **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.** My decision to implement the amendment will not adversely affect any endangered or threatened species or habitats determined to be critical under the Endangered Species act of 1973. I have reviewed the biological assessment prepared for this EA and the US Fish and Wildlife Service concurrence letter (located in the EA, project file - Wildlife) . While they agreed with the “may effect, not likely to adversely affect” determination for grizzly bear, Canada lynx and designated critical lynx habitat , the US FWS also agreed with Forest biologists that the proposed action is not likely to adversely affect these species (EA, p. 84). Wildland fire is considered an emergency situation, and depending on its location, size, and values at risk, may or may not require an emergency consultation between the Forest Service biologist and U.S. Fish and Wildlife Service. The need for consultation will depend on the location, time of year, presence or absence of threatened and endangered species, and whether management may affect threatened and endangered species. Potential programmatic cumulative effects would be analyzed during individual fire incidents. Furthermore, the proposed management direction does not alter the environmental protection afforded threatened and endangered species that is already provided by law and the Forest Plan.
 10. **Whether the action threatens a violation of Federal, State or local Law or requirements imposed for the protection of the environment.** My decision to implement this amendment will not violate Federal, State, and local laws or requirements for the protection of the environment.

APPENDIX B

FIRE MANAGEMENT AMENDMENT TO THE GALLATIN NATIONAL FOREST PLAN

Response to Environmental Assessment Comments

List of Commenters

Letter #	Name	Organization	Date
1	Rod Young	Individual	05/23/2011
2	Amo R. DeBernardis	Individual	05/23/2011
3	David Klatt	Individual	05/24/2011
4	Sara Jane Johnson	<i>For Native Ecosystems Council (NEC) & Alliance for the Wild Rockies (AWR)</i>	05/24/2011
5	Beth Larson	Individual	05/31/2011
6	Dana M. Johnson	<i>Lawyer for NEC, AWR and Montana Ecosystem Defense Council (MEDC)</i>	06/06/2011
7	Steve Kelly	<i>for MEDC and AWR</i>	06/06/2011

Comments

1-1. "Opposed to amending the 1987 wildfire plan."

GNF Response: This comment is duly noted.

2-1. Supports "... the plan and only wish it included the removal of mature timber which can be used and not burned."

GNF Response: This comment is duly noted. The proposed amendment does not change management direction found in the 1987 Forest Plan concerning the management or removal of mature timber.

3-1. Mr. Klatt "...questions (the Forest's) belief that the amendment will cost less."

GNF Response: With the selection of the proposed amendment (Alternative 2), there could be opportunities to reduce costs associated with fire suppression actions, such as minimizing the use of full fire perimeter control tactics where it is not needed (EA, p. 16). The Gallatin National Forest has performed a cost analysis comparing wildland fires that received aggressive suppression management actions to those with a limited containment and fire use strategies (Fire Amendment project file: Fire and Fuel Analyses). This analysis looked at four fire management strategies in use since 1990: full perimeter control, limited perimeter control, point protection and monitor (use of natural fire to achieve resource objectives).

Strategy	Cost/acre	Average size (acres)
Full perimeter control for A-D fire sizes ¹	\$ 10,500	2.7
Full perimeter control for E-G fire sizes ²	\$ 1,910	15,595
Limited perimeter control	\$ 876	6,599
Point protection	\$ 523	13,014
Monitor from the ground or by air	\$ 55	3,200

¹ Fire Sizes: A (<= .25 acres), B (.25 - 9.9 acres), C (10 - 99.9 acres) and D (100-299.9 acres)

² Fire Sizes: E, F and G (> = 300 acres)

It should be noted that each unplanned wildland fire and circumstances associated with it (location, time of day and season, weather, fuel conditions, values at risk, etc.) are unique. That

being said, the data indicates a potential for cost savings when minimal limited perimeter control and point protection measures are used versus full perimeter control because, generally, fewer fire management resources are needed to provide that limited control.

- 3-2. "...the Forest Service has had difficulty putting out large fires under the new policies, how would that change?"

GNF Response: As stated in the EA (p. 8), the proposed fire management amendment is not promoting a "let-burn" or "hands-off" fire management approach. The proposed change is simply whether one or more fire management strategies can be considered for an unplanned wildland fire occurring on National Forest System lands on the Gallatin National Forest. This is not an available management consideration under the 1987 Forest Plan, with exception to MA 4 (wilderness and recommended wilderness areas). Implementation of the proposed amendment would result in the Forest Plan corresponding with current National wildland fire management policies and aligning fire management with other national forests and parks that make up the Greater Yellowstone Area (EA, P. 8, 9 and 17).

Many of the large-scale fires tend to be weather-driven, fast-moving, high fire intensities, plume-driven events. There is no doubt that fire managers and fire management resources will continue to be challenged by large fires that escape early control and containment efforts regardless of the fire management strategies under Alternative 1 (the current Forest Plan direction) or with changes proposed in this amendment.

All fires would be managed beginning with a strong initial fire "size-up", followed by an evaluation, including but not limited to: the potential public and firefighter safety concerns/needs; values at risk (such as wildland urban interface areas, municipal watersheds, power lines, and threatened and endangered species habitat); short-term and long-term fire weather conditions; local, State-wide and regional fire activity; air quality/smoke concerns; fire management resource needs and the availability of those resources; trigger points and contingency plans; vegetation and hazardous fuel management opportunities using fire; and cost effectiveness. A decision on how best to manage the fire is then determined and reviewed daily or as conditions change (EA, P. 8).

- 3-3. "Your amendment adds a decision making process, which will undoubtedly take time, time for any fire to enlarge."

GNF Response: Unplanned wildland fire is considered an "emergency" situation. Once a fire is discovered, fire management resources are dispatched to that location, while simultaneously a rapid emergency assessment of the fire is being made, considering many factors such as: firefighter and public safety, current in future weather conditions, values at risk, and Forest Plan management area direction, to name a few (refer to the EA, p. 18). A decision on how best to manage the fire is then determined and reviewed daily or as conditions change. This is not new. The Forest Service has exercised a variety of fire management strategies on several unplanned wildland fires in the past to ensure firefighter and public safety, to minimize effects to private land inholdings and developed areas, and in situations where the availability of fire management resources are limited due to other activity in the area. The proposed fire management amendment would not change this management decision process, but would expand opportunities to consider using an unplanned wildland fire to achieve other resource objectives, when and where appropriate.

- 4-1. "There is no information provided as to what level of prescribed burning will be planned in Management Area 4 (wilderness, areas, wilderness study areas, research natural areas)."

GNF Response: This EA does not propose any changes to the current direction and guidance already in place concerning the use of prescribed burning within Management Area 4, designated and recommended wilderness areas, as outlined in the 1987 Forest Plan (FP, p. 12 and under the

description of standards for each MA), Forest Service Manual 2324.21, and/or guidance provided in the two wilderness area fire management guidebooks. As stated throughout the EA, the fire management amendment to the Forest Plan specifically proposes updating the Forest Plan direction and guidance in terms of management strategies for unplanned, naturally-ignited wildland fire (EA, p. 10, 16, 18, 19, 20 and 23).

The 1987 Forest Plan Management Area 4 includes designated wilderness areas (Absaroka Beartooth and Lee Metcalf Wildernesses), and the Lionhead and Republic Mountain recommended wilderness areas (FP, p. III-10). The Wilderness Act of 1964, which was amended in 1978 (16 USC 1131-1136), and Forest Service Manual 2324.21 provide objectives of fire management (naturally-ignited and prescribe fire) in wilderness (EA, p. 101). The Absaroka Beartooth (1993) and Lee Metcalf (1997) Wilderness fire management guidebooks, which underwent a public review process prior to their final publication, provide opportunities to consider using prescribed fire for fuel management objectives consistent with National policies, specifically Forest Service Manual 2324.21 (EA, p. 10, 16, 17, 42, 98, 99, 100, and 102; 1993 Absaroka Beartooth Wilderness fire management guidebook, p. 49; and 1997 Lee Metcalf Wilderness fire management guidebook, p. VI-1). The proposed amendment proposes to replace the somewhat generic fire standard found in the 1987 Forest Plan pertaining to the use of prescribed fire within MA 4, which states - *The use of scheduled prescribed fire in wilderness will be consistent with National Forest policy* (FP, p. III-12). The fire standard would be substituted with the more detailed prescribed fire and fuel management guidelines outlined in the two wilderness fire management guidebooks, which are already in practice. The sole reason for this proposed action is to eliminate the need for two stand-alone wilderness fire management guidebooks; thus insert/combining that information formally in the Forest Plan through the fire management amendment effort.

MA 4 does not include wilderness study areas or research natural areas. As stated in the EA (p. 101), there is no fire management guidance for unplanned wildland fire or prescribed fire provided in the Montana Wilderness Study Act or Hyalite-Porcupine-Buffalo Horn Wilderness study report (1985). Unplanned and prescribed fire management options within the Hyalite-Porcupine-Buffalo Horn WSA would be responsive to goals and standards of those individual Forest Plan management areas found within the WSA boundary.

As stated in the proposed amendment EA, there would be no change to Forest Plan direction pertaining to the use of prescribed fire in all management areas (EA, p. 18). Forest Plan direction for research natural areas (MA 21), describes standards specific to the use of prescribed fire as follows: "Prescribed fire may be used to perpetuate the natural diversity of plant communities (EA, p. 96; FP, p. III-64)."

- 4-2. "The agency needs to clearly define what the expected changes on the ground will be from current conditions due to this amendment".

GNF Response: The proposed fire management amendment does not proposed any ground disturbing activities. The goal and objective of the amendment is to update the 1987 Forest Plan to the current National fire management policies and terminology concerning unplanned, naturally-ignited fire events. The "expected changes on the ground" from these events and management responses to them are not possible to predict, with or without an amendment.

- 4-3. "The use of an environmental assessment is in appropriate for this amendment, as the agency is proposing very significant changes to the Forest Plan, such as prescribed burning in MA 4. Aside from the fact that these activities will be a violation of the Wilderness Act, a change in management from natural to unnatural practices on a large part of the Forest is clearly a significant impact that requires an environmental impact statement."

GNF Response: Forest Service Manual 2324.21 (management of fire in designated wilderness) sets forth specific fire management objectives that allow the use of prescribed fire and unplanned (lightning-caused) fire, with the overriding objective to “permit lightning-caused fire to play as nearly as possible their natural ecological role within the wilderness” (FSM 2324.21(1); EA, p. 98). As discussed in Comment 4-1, the 1987 Forest Plan already provides fire management direction and standards, which allow the consideration and use of naturally-caused wildland fire, as well as management-ignited (prescribed burning) fire in MA 4 (designated and recommended wilderness areas). There is no change being proposed in this EA to the current Forest Plan standards found in all management areas concerning prescribed fire, nor the information provided in the two wilderness area fire management guidebooks concerning the use of prescribed fire. The proposed amendment (Alternative 2), if implemented, would only replace the sentence found in the Forest Plan standards regarding prescribed fire in MA 4, with that found in the two wilderness area fire management guidebooks (EA, p. 16 -17). Refer to GNF response to Comments 4-1 and 4-11.

- 4-4. “The Gallatin NF has made so many amendments to the 1986 Forest Plan that the existing document lacks a significant amount of information... (Instead of) doing yet more amendments, the agency would make forest planning more user-friendly by simply revising the current plan... (The plan) is severely outdated.”

GNF Response: As discussed in the proposed amendment EA, the National Forest Management Act (NFMA) has provisions that allow the amending of Forest Plans (EA, p. 11). NFMA regulations require the deciding official to determine whether the amendment would result in a significant change to the objectives, guidelines and other contents of the Forest Plan. During the initial public scoping period, NEC requested the Forest consider an alternative revising the entire Forest Plan instead of addressing needed changes and updates through use of amendments. The Forest considered this request and formulated an alternative that was considered but not analyzed in detail study based on the following: 1) an amendment to the Forest Plan is appropriate according to NFMA [36 CFR 219.10(f), 1982]; and 2) drafting an amendment is more timely in terms of responding to National policy changes (EA, p. 11, 18 and 19).

- 4-5. “There is no information in the proposed EA regarding how inventoried roadless lands would be managed differently under the amendment.”

GNF Response: Inventoried roadless areas were not analyzed in detail under this proposed amendment because fire management (unplanned and planned) within inventoried roadless areas is governed by the standards described in the Forest Plan under individual management areas which are situated in inventoried roadless areas. The amendment (Alternative 2) does not propose any changes to how inventoried roadless lands are managed.

- 4-6. “The agency’s attempt to make fire fighter safety the “primary” management objective on every acre of National Forest Lands is unacceptable.” The letter further states, “(This is) simply a means of justifying fuels reduction activities on every acre, regardless of impacts on other resources, and basically nullifies the purpose of a Forest Plan, which is to ensure proper resource management.”

GNF Response: All fire management decisions and actions must and always provide for firefighter and public safety above all other considerations. Firefighter and public safety are the Forest Service’s, and other fire management agencies, primary objectives in all aspects of public land management, especially where the public and property are likely to be threatened by wildfire (National Fire Plan 2001; Federal Wildland Fire Policy 1995, as amended 2008, 2009). The Forest Service emphasizes throughout the EA document that the proposed amendment would allow strategic choices to manage naturally-caused, unplanned wildland fire in ways that better align with proper resource management (EA, p. 10, 16, 17, 19, 20 and 23).

- 4-7. “The fire amendment is making logging the primary management activity on the entire forest, since fuels reduction projects are justified on the basis that they increase fire fighter safety.”

GNF Response: This comment is not applicable to this EA and the proposed amendment to update fire management direction in the Forest Plan. The Fire Management Amendment EA does not propose any ground-disturbing or logging actions to achieve this goal. As stated in the EA, Chapter 1, the proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide fire managers with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire.

- 4-8. “The agency’s claims regarding interrupted fire cycles means the NEPA analysis is flawed, since this is the basis of the proposed amendment.”

“(the EA) implies that there has been an interruption of natural fire cycles, even though some of the literature cited ... demonstrate the opposite.”

GNF Response: This comment makes no reference to which literature cited they are referring to in this statement. The resource specialists involved in this project utilized a variety of current scientific literature, peer-reviewed data and management recommendations from a variety of views and findings.

The fire and fuel analysis found in the EA (p. 33-43) provides a Forest-wide discussion of the various vegetation habitats and the typical fire behavior and historical fire return intervals of each. This information is used to describe the current horizontal and vertical fuel conditions, and expected fire behavior (both fire size and type). The data and research papers cited for this analysis have been deemed pertinent and reliable in the scientific establishment. Many researchers have studied and strongly agree that the national focus on fire suppression since the 1910 fires in Western Montana and Idaho, coupled with cooler/wetter pacific decadal oscillation years between 1930 and 1970, have setup vegetative and fuel conditions across the Western US conducive to larger, more severe wildland fire events, and atypical fire behavior (Arno 1980; Arno and Brown 1991; Arno and Gruell 1986; Barrett and Arno 1993; Bond and Keeley 2005; Gibson et al 2008; Graham et al 2004; Keane et al 2002 and 1998; Scott and Burgan 2005). For others, refer to the Fire and Fuel Literature Cited provided in the Fire Management Amendment EA (EA, p. 112-114).

The proposed fire management amendment would update the 1987 Forest Plan directions, standards and guidelines for managing unplanned (i.e., lightning-caused) wildland fire (EA, p. 10,11 and 15-23). The need for this action is to bring the 1987 Forest Plan direction for fire management in compliance with more current national policies, update the terminology, and better align the Forest with fire management strategies already in-place on most GYA national forests and national parks.

- 4-9. “There is no analysis in the EA regarding why, if a fire cycle is currently longer than what is clearly a variable fire history given climatic fluctuations, (that has been) detrimental to what wildlife species.”

“..the EA implies that the current habitat is degraded due to the lack of wildfires, and that the agency will correct these degraded ecosystems due to the lack of fire by increasing burning, without providing any actual support as to why this amendment is needed.”

GNF Response: This comment is not applicable to this EA and the proposed amendment to update fire management direction in the Forest Plan. The analyses presented in the EA makes no claim that a variable fire cycle is detrimental to wildlife species. Furthermore, the analyses make no

claim that current habitat is degraded due to the lack of wildfires. Refer to GNF response to Comment 4-8.

- 4-10. "Please discuss all the recent publications on fire cycles and define specifically why wildlife habitat has been degraded due to a lack of fire. The constant references to increased diversity that will occur with more prescribed burning is far too vague to provide the public with any information on why habitat is currently degraded."

GNF Response: The proposed amendment does not propose any prescribed burning actions. Furthermore, the analyses for the proposed fire management amendment makes no reference to increased wildlife habitat diversity with more prescribed burning. As stated, the fire management amendment deals with Forest Plan directions, standards and guidelines for managing unplanned (i.e., lightning-caused) wildland fire (EA, p. 10,11 and 15-23). Refer to GNF response to Comment 4-8 and 4-9.

- 4-11. "We object strongly to the purpose of this amendment, which is clearly to allow prescribed burning, or active management within MA 4 areas, which include existing wilderness areas, wilderness study areas and research natural areas."

GNF Response: The fire management amendment does not propose any "prescribed burning or active management" within MA 4 areas, which include designated wilderness and recommended wilderness areas only. Under Alternative 1 (current Forest Plan direction), any use of unplanned or prescribed fire within MA 4 areas would be governed by Forest Service Manual 2324.2 and the Absaroka Beartooth Wilderness and Lee Metcalf Wilderness fire management guidebooks (p. 49 and p. VI-1, respectively). Refer to GNF response to Comment 4-1 and 4-3.

Alternative 2 proposes to replace the somewhat generic fire standard found in the 1987 Forest Plan which pertains to the use of prescribed fire within MA 4, which states - *The use of scheduled prescribed fire in wilderness will be consistent with National Forest policy* (FP, p. III-12). The fire standard would be substituted with the more detailed fire and fuel management guidelines outlined in the two wilderness fire management guidebooks, which are already in practice. The direction found in the two wilderness fire management guidebooks originates directly from the direction found in FSM 2324.2. The sole reason for this proposed action is to eliminate the need for two stand-alone wilderness fire management guidebooks; thus insert/combining that information formally in the Forest Plan through the fire management amendment effort. Refer to GNF response to Comment 4-1.

The Hyalite-Porcupine-Buffalo Horn Wilderness Study Area (HPBH WSA) and the research natural areas found throughout the Gallatin National Forest are not included under Management Area 4. In the HPBH WSA, unplanned and prescribed fires are managed under the goals and fire management standards of individual Forest Plan management areas found within the WSA boundary.

The 1987 Forest Plan places all research natural areas (RNAs) under Management Area 21 (Forest Plan, p. III-62 to III-64). Although there are no prescribed burning activities being proposed in this amendment, MA 21 provides a fire standard using prescribed fire to perpetuate the natural diversity of plant communities. The fire management amendment does not include a proposal to modify this standard. Under both alternatives, the fire management options for research natural areas (RNAs) that lie within wilderness area boundaries would be governed by direction and guidance found in FSM 2324.2 and the two wilderness area fire management guidebooks (EA, p. 95). Under Alternative 1 (current FP direction), unplanned fires that occur within those RNAs which are not located within designated wilderness areas, would be managed using control, contain and confine strategies (Forest Plan, p. III-64). Alternative 2 (proposed amendment) would

consider the current fire management strategies, along with using fire as a tool to meet resource objectives on all National Forest System lands, which would include RNAs (EA, p. 95).

The Rocky Mountain Research station, who shares responsibility with Forest Service in managing RNAs across the Northern Rockies, has reviewed the proposed amendment, and discussion of potential effects specific to RNAs and SIAs, and has concurred with the proposed changes in Alternative 2 (the proposed amendment) (EA, p. 96; RMRS Letter in project file).

- 4-12. "Inventories roadless lands were not discussed in the EA, but these would likely also be targeted for increase planned burning."

GNF Response: Refer to GNF response to Comment 4-5.

- 4-13. "The proposed amendment is a clear violation of the Wilderness Act and the Roadless Area Conservation Rule since it allows unnatural versus natural management of these protected lands. The amendment is therefore illegal, since it conflicts with existing laws and the Roadless Area Conservation Rule, as well as the management of RNAs and SIAs."

GNF Response: Refer to GNF response to Comments 4-1, 4-5 and 4-11.

- 4-14. "Fire management should not be homogenized across the Forest, as is being proposed with the elimination of Appendix E which defines different fire management policies for various MAs. This is a violation of the forest planning direction in NFMA, since there is to be different resource emphases for different lands to provide an overall balance of resource management across the Forest."

GNF Response: The 1987 Forest Plan Appendix E (Fire Management Analysis) does not define fire management policies for various management areas. This appendix addresses, in general terms, the standards for fire that are part of the management area prescriptions found in Chapter III of the Forest Plan. Furthermore, the fire analysis relates to the management prescriptions assigned in the Forest Plan by indicating an appropriate level of suppression response for each management area. It also provides basic standards for prescribed fire. Other fire-related management, such as fuels management and fire prevention, are discussed in the Forest-wide standards and guidelines (FP, p. E-1). Specific standards for both unplanned and prescribed fire management are outlined under each management area description found in Chapter III of the Forest Plan.

As stated in the proposed amendment Chapter 2, Alternative 2, Item 8 (EA, p. 17 and 21), the information provided in the Forest Plan Appendix E is based on policies and terminology in place at the time. The proposed amendment seeks to change the limited fire suppression strategies of "control, contain and confine", as described in this appendix, to allow fire managers and line officers the ability to consider all strategies appropriate for managing unplanned ignitions, while achieving land management goals. In essence, the proposed amendment does the opposite, by allowing variability in response and management of unplanned wildland fire not currently allowed under the 1987 FP direction. The Fire Analyses (Levels I, II and III) mentioned in Appendix E have been outdated since 1992, and have since been replaced nationally with more current fire program and budgeting procedures. Therefore, the Fire Analyses Levels I, II and III are no longer used, and therefore obsolete.

Furthermore, this proposed amendment does not involve any changes to the overall goals and objectives of each management area resource emphasis - only the fire standard description found under each. Therefore, the "overall balance of resource management across the Forest" would be maintained.

- 4-15. "Making fuels reduction the primary emphasis on every acre on the Forest is an NFMA violation since there will be only one primary resource priority across the forest, which in effect will be fuels reduction and logging to protect fire fighters."

GNF Response: Refer to GNF response to Comments 4-6 and 4-7. This comment is not applicable to this EA and the proposed amendment to update fire management direction in the Forest Plan. EA does not propose any fuels reduction activities nor ground-disturbing or logging actions.

- 4-16. “The EA implies that the fire amendment will result in increased age and size class diversity on the forest. (The) amendment will reduce older forest habitat and increase habitat fragmentation for wildlife. It is unclear why this should be a forest-wide objective, to degrade wildlife habitat.”

“... the amendment will have a negative impact on these most vulnerable wildlife species. The EA did not identify this problem, or define why habitat loss for a large suite of vulnerable wildlife should be a Forest-wide objective.”

GNF Response: There is no forest-wide objective to degrade wildlife with the proposed fire management amendment. Discussions of potential effects of the proposed amendment compared to current Forest Plan fire management direction has been provided for a variety of aquatic and terrestrial wildlife species in the EA, Chapter 3, Section 3.2.2 (Fish, Amphibians and Aquatic Resources, p. 46-51), and Section 3.3 (Wildlife Habitat, p. 58-87). Furthermore, the biological assessment for this proposed amendment has been reviewed by the US Fish and Wildlife Service, with their concurrence that the proposed action is not likely to adversely affect the threatened grizzly bear, the threatened Canada lynx, or designated critical lynx habitat. Refer to GNF response to Comment 4-8 and 4-9.

- 4-17. “The EA also failed to define why it is necessary to change historic fire patterns of large wildfires to a different pattern of smaller fires. Since larger fires were a natural pattern, why does the agency believe that this natural pattern needs to be changed? ”

GNF Response: The analyses comparing the current fire management direction found in the Forest Plan with the proposed amendment to that direction makes no statement that current fire sizes are unnatural. The Greater Yellowstone area is a fire-adapted ecosystem, where large-scale fire events are normal (Turner et al 2011). As stated in the EA, the most important ecological processes that have been altered by fire exclusion are the natural fire regimes and fire return intervals, which influence vegetative patterns, structure and biodiversity across the landscape (EA, p. 41). Wildland fire changes the forest, which ultimately changes the way fire acts on the changed landscape. Expanding the opportunity to consider wildland fire as a management tool would help in eventually changing the distribution and configuration of fuels enough over time to limit fire spread (Turner et al 2011).

- 4-18. “There is no economic assessment of how prescribed burning will affect wildfire suppression costs. The assumption is that the agency can reduce wildfires by increasing prescribed burning, which was not supported by any science.”

GNF Response: There was no economic assessment performed concerning prescribed burning and effects to wildfire suppression costs because the proposed amendment addresses the options and strategies for managing unplanned wildland fire only (EA, p. 10). The Forest Service is not proposing any changes to the current management options and standards concerning prescribed burning as found in the 1987 Forest Plan and the use of prescribed fire outlined in the two wilderness area fire management guidebooks.

- 4-19. “(There) are other options to reducing fire suppression costs, such as unnecessary control activities, etc. If this is an important reason for the amendment, there are certainly many other options/alternatives to address this problem, options that may also be more effective. The alternatives to addressing suppression costs are too limited to make a reasoned decision on this problem.”

GNF Response: Refer to GNF response to Comment 3-1 and 3-2. The Fire Management Amendment EA does not consider an alternative that addresses suppression costs, nor compares the costs of fire management actions between the two alternatives. The proposed change (Alternative 2) to current Forest Plan direction (Alternative 1) is simply whether one or more fire management strategies can be considered for an unplanned wildland fire occurring on National Forest System lands on the Gallatin National Forest.

4-20. "It is not clear why the reduction of natural wildfires on the landscape is considered an adverse impact on lynx."

"(To) the contrary, an attempt to reduce natural fires is an adverse impact on lynx, an impact that should be addressed thru formal consultation with the USFWS."

GNF Response: The very purpose of this amendment action is to increase options for using unplanned, natural fires to achieve resource objectives. The EA does not state that a reduction in natural wildfires results in adverse impacts to Canada lynx. The effects analyses regarding Canada lynx and designated critical lynx habitat, are provided under Chapter 3.3.2 *Threatened and Endangered Wildlife Species* section (EA, pages 76-84). As stated in the EA and accompanying Biological Assessment, the Gallatin National Forest, which lies within the Greater Yellowstone Area Unit 5, is considered naturally marginal lynx habitat with highly fragmented foraging habitat. The USFWS has reviewed the proposed fire management amendment and supports the proposed amendment, Alternative 2, stating that fire is a natural component and important for fire-adapted ecosystems (USFWS Concurrence, EA, p. 84).

4-21. "The disturbance of security areas for the grizzly bear will also be an adverse impact, which requires formal consultation to allow the taking that will result."

GNF Response: The effects analysis regarding grizzly bear habitat is provided under Chapter 3.3.2 *Threatened and Endangered Wildlife Species* section (EA, pages 69-76). As stated in the EA (p. 70), the level and intensity of unplanned, lightning-caused wildland fires, or how fires will change grizzly bear foraging and denning habitat, is unpredictable. Wildland fire is considered an emergency situation, and depending on its location, size and other values at risk, routinely initiates an emergency consultation between the Forest Service and USFWS as soon as possible (EA, p. 72). Emergency consultation with USFWS has been a routine practice since 2000.

The EA further describes the recommended minimization measures for Federally-listed threatened, endangered and proposed threatened species used during wildland fire management activities, which include, but not limited to: proper food and garbage storage, locations of large base camps and spike camps, seeding and planting specifications, and human/bear encounter reporting procedures, to name a few (EA, p. 74-75).

4-22. "The EA implies that prescribed burning and fuels reduction is wholly beneficial to wildlife, and thus should be promoted."

GNF Response: The EA does not address or promote prescribed burning and fuels reduction as proposed actions associated with the proposed amendment Alternative 2. As stated throughout the EA, and specifically in the description of the proposal (EA, p. 10 and 12) and alternative 2 (p. 16, items 3 and 4), the changes being proposed concern management of unplanned wildland fire. The Forest Service is not proposing any changes to the current management options and standards concerning prescribe burning as found in the 1987 Forest Plan and the use of prescribed fire outlined in the two wilderness area fire management guidebooks.

4-23. This comment asks why the Grizzly Bear Conservation Strategy "... is being used to define project impacts, or mitigation measures for a loss of security that will occur with increased management of unroaded secure habitat for the grizzly bear?"

GNF Response: This request to address “increased burning/logging to reduce fuels in unroaded lands that provide security for the grizzly bear” is beyond the scope of the proposed fire management amendment EA. The intent of the proposed amendment is to provide the fire manager, district rangers and their resource specialists, a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire. This request is not pertinent to the proposed change in management options for an unplanned ignition, and beyond the scope of the proposed amendment. This EA makes no reference to the Grizzly Bear Strategy in defining how increased burning/logging to reduce fuels in unroaded lands. This comment is not relevant to the changes in fire management direction in the proposed amendment.

- 4-24. “The objective to reduce natural wildfires, and instead have smaller areas of forest thinning/fuels reduction, was not discussed in regards to snag habitat and coarse woody debris availability on many wildlife species.”

GNF Response: This comment is not relevant to the proposed fire management amendment. This EA does not propose an objective to reduce natural wildland fires, nor thinning or fuels reduction actions. Instead, the fire management amendment EA proposes expanding opportunities to consider using naturally-ignited fire to achieve a variety of resource objectives versus limiting where fire can be used as a management tool as described in the 1987 Forest Plan. Therefore, this comment is beyond the scope of the proposal to update management options for unplanned wildland fire on the Gallatin National Forest.

- 4-25. “How will the role of large severe wild fires be replaced by the proposed activities in the amendment?”

GNF Response: There are no vegetation manipulation treatments or ground-disturbing activities being proposed in this amendment EA. Again, the purpose and need for updates to fire management as described in the 1987 Forest Plan is to update the Forest Plan to current National Fire Management policies and terminology. Refer to EA (p. 7-11) and GNF response to Comments 3-2 and 4-17.

- 4-26. “The EA infers that prescribed fire will improve wildlife habitat, while natural fire will not. The details for these conclusions were never provided.”

“(Activities) .. associated with fuels reduction burning, such as slashing of smaller trees, firelines, disturbances associated with (prescribed) burning, will have effects on sensitive wildlife habitats, and was not addressed in the EA.”

GNF Response: These comments are not relevant to the proposed fire management amendment. This EA does not propose any activities “associated with fuels reduction burning, such as slashing of smaller trees, firelines, disturbances associated with (prescribed) burning”. The Fire Management Amendment to the Gallatin National Forest Plan EA makes no inferences or conclusions regarding whether or not prescribed fire would improve wildlife habitat. Refer to GNF Response to Comment 4-22.

- 4-27. “The EA implies that this increased fuels reduction program is needed by wildlife and will be highly beneficial...”

GNF Response: This comment is not applicable to this EA and the proposed amendment to update fire management direction in the Forest Plan. The Fire Management Amendment to the Gallatin National Forest Plan EA does not propose any action that considers an increased fuels reduction program for wildlife. Refer to GNF response to Comment 4-22 and 4-26.

- 5-1. “We fully support allowing fires to run their natural course with public safety remaining top priority. We would encourage continued efforts to educate those living on the forest interface

about creating defensible space around structures as well as creating options for developments...”

GNF Response: This comment is appreciated and duly noted.

- 6-1. “Alliance for the Wild Rockies and Native Ecosystems Council have strong concerns over the seeming lack of full disclosure regarding the scope of this amendment, particularly with regard to how this amendment will affect future project implementation on the Forest.”

GNF Response: The scope of the proposed fire management amendment is described thoroughly in Chapter 1 (p. 7, 9-11), and Chapter 2 (p. 19-32). The fire management amendment proposes changes that would assist fire managers, district rangers, forest supervisors and their resource staffs when considering management options for an unplanned, naturally-caused wildland fire. Effects to future projects, whatever they may be, would be analyzed at the time of those project proposals.

- 6-2. “There is no information provided as to what level of prescribed burning will be planned in Management Area 4 (wilderness areas, wilderness study areas, and research natural areas). The agency needs to clearly define what the expected changes on the ground will be from current conditions due to this amendment.”

GNF Response: Refer to GNF response to Comments 4-1, 4-3 and 4-11. This comment is not applicable to this EA and the proposed amendment to update fire management direction in the Forest Plan. The fire management amendment is not proposing any prescribed burning projects. Any future prescribed burning project proposal would go through individual NEPA analysis as is the usual practice. The only reference to prescribed burning found in the proposed amendment is the consideration to replace the generic “use of prescribed fire” statement found in the 1987 Forest Plan under the fire management standards pertaining to Management Area 4 (*The use of scheduled prescribed fire in Wilderness will be consistent with National Forest policy*, FP, p. III-12) with the more detailed prescribed burning direction already found in the two Wilderness fire management guidebooks, which went through a public review in 1993 and 1997 (EA, p. 10, 1620, 2129, 30,101 and 102). The sole purpose in revising this section of the MA 4 standards for fire is to eliminate the need for two stand-alone wilderness fire management guidebooks; thus insert/combining that information formally in the Forest Plan through the fire management amendment effort. Refer to GNF response to Comment 4-11.

- 6-3. “The Forest Service proposes to replace programmatic management direction on the entire Forest with little explanation, and little disclosure of the environmental impacts, in violation of NFMA’s Regulations at 36 CFR 219.15 and 36 CFR 219.27, and NEPA’s Regulations at 36 CFR 219.10. The proposed amendment to the Forest Plan EA did not conduct the proper interdisciplinary analysis and public participation required for a significant Forest Plan amendment, in violation of the National Forest Management Act (NFMA), the National Environmental Policy Act (NEPA), and the Administrative Procedures Act (APA).”

GNF Response: The EA proposes to replace programmatic management direction on the entire Forest in all management areas pertaining to the management of unplanned wildland fires only (i.e., lightning-caused fires). As stated throughout this response to comments document and the EA: (1) there are no changes to Forest-wide management goals, objectives and standards or individual Forest Plan management area goals and standards as provided in the Gallatin NF Forest Plan and other approved amendments since 1987 (EA, p. 15); and (2) there is no change to the current 1987 Forest Plan direction, objectives and standards for using prescribed fire as provided in the 1987 Forest Plan and the two wilderness area fire management guidebooks (EA, p. 10).

The fire management amendment is not “in violation” of NFMA 36 CFR 219.15 (*Vegetation management practices*) because there are no vegetation management actions being considered or

proposed. The 36 CFR 219.27 specifies management requirements for resource protection, vegetation manipulation, silvicultural practices, even-aged management, riparian area protection, soil and water protection, and preservation and enhancement of plant and animal diversity, and applies primarily to vegetation and ground disturbing actions. The Fire Management Amendment EA does not propose any ground-disturbing or vegetation management actions. The intent of the proposed amendment is to provide the fire manager and deciding officer with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire.

The Fire Management Amendment to the Forest Plan is in compliance with 36 CFR 219.10 - specifically Item 219.10(f), which provides guidance in amending the Forest Plan.

The amendment effort is also in compliance with the NFMA and APA direction for public notification and involvement. Notification of the proposed fire management amendment has been posted on the Gallatin National Forest's Schedule of Proposed Actions (SOPA) website since May 2009. As disclosed in the EA (p. 13), approximately 250 individual agencies and other interested parties were notified of the proposed amendment in June 2009. Of those, only two comment letters were received. Additional collaboration has occurred with local, State and other fire management agency partners. Based on preliminary analyses of potential effects on a variety of resources, and the comments from the public and fire management partners, the Forest Service decided an environmental assessment was the appropriate analysis tool given the issues, rather than an environmental impact study. The results of the various effects analyses provided in Chapter 3 of the EA found no significant effects between the current Forest Plan direction for management of unplanned wildland fire (Alternative 1) and the proposed amendment (Alternative 2).

- 6-4. "This amendment will override all forest plan standards and you have not fully disclosed the scope and impact to the public."

GNF Response: Refer to GNF response to Comment 6-1 and 6-3. The proposed fire management amendment addresses management options for unplanned wildland fire only. As emphasized on page 15 of the EA, there would be no changes to individual Forest Plan management area goals with the decision to adopt the proposed fire management (Alternative 2) - only an update to the specific fire management "standard" listed under each management area description.

- 6-5. "A fire management amendment to the Forest Plan is a major federal action that may significantly affect the environment." The comment goes further to state that the National Environmental Policy Act (NEPA), 42 U.S.C. § 4331 *et seq.*, mandates that the Forest Service consider and disclose environmental impacts. Federal agencies must prepare an EIS for major federal actions that may significantly affect the environment. 42 U.S.C. § 4332(2)(C). Preparation of an EIS is required. 16 U.S.C. 1604(f)(4), 36 CFR 219.10(f), and 36 CFR 219.12.

GNF Response: Refer to GNF response to Comment 6-1, 6-2 and 6-3.

- 6-6. "The EA repeatedly states that previously restricted management options in designated management areas will now be open to a "full spectrum of fire management strategies and options," yet there is no discussion of the potential management options and no specific locations, conditions, or limitations identified for any specific management option. This vague circumvention of disclosure is unacceptable under the requirements NEPA."

GNF Response: The EA describes the variety of fire management strategies and options in Chapter 2 (EA, p. 17). They include, but are not limited to: monitoring the fire from a distance or by aerial observations; monitoring on-site; point-protection or confine/contain; monitoring with limited contingency actions such as point-protection near values at risk; monitoring with mitigation actions; suppression with multiple strategies; control and extinguish; or any combination of some

or all of listed. The EA does not provide information of locations, conditions or limitations because the Forest Service cannot predetermine where an unplanned ignition (lightning-caused fire) will occur. As stated in the EA (p. 16): *Strategies can range from aggressive suppression actions to using a wildland fire to achieve resource objectives in compliance with Forest Plan or other approved direction.* Furthermore, the EA states: *Fire management would continue to be responsive to Forest-wide and management area goals, objectives and standards described in the 1987 Forest Plan* (EA, p. 18).

- 6-7. "An Environmental Assessment is insufficient for this amendment, as the agency is proposing significant changes to the Forest Plan, such as authorization of potential prescribed burning and logging in MA 4 areas."

GNF Response: The fire management amendment EA only addresses management of unplanned wildland fire, and the proposal to expand the response options in managing a naturally-caused ignition on the landscape. This proposed amendment does not include logging and prescribed burning actions within designated wilderness areas. Furthermore, there would be no change to the fire management standards provided in the Forest Plan MA 4 which already allows for consideration and use of prescribed burning within designated wilderness areas (FP, p. III-12) , per FSM 2324.2 and the fire management guidebooks for the Absaroka Beartooth and Lee Metcalf wilderness areas (AB, p. 49; LM, p. VI-1) . Refer to GNF response to Comment 4-11.

- 6-8. "The EA failed to adequately assess cumulative impacts from the proposed action in violation of NEPA. NEPA requires that "where several actions have a cumulative or synergistic environmental effect, this consequence must be considered in an EIS." *City of Tenakee Springs v. Clough*, 915 F.2d 1308, 1312 (9th Cir. 1990). Additionally, NEPA requires programmatic consideration of impacts where there are several large scale plans for "foreseeable similar projects in a geographical region..." *Clough*, 915 F.2d at 1312."

GNF Response: The proposed amendment objective is to update the 1987 Forest Plan to current National Fire Management Policies for managing wildland fire. There are no ground-disturbing actions being proposed. It is impossible to predict the location, size, intensity and severity of an unplanned wildland fire. Based on the fact that unplanned wildland fire is inevitable and unpredictable, the EA provides general discussions of the direct, indirect and cumulative effects of an unplanned wildland fire in Chapter 3. As stated in the EA (p. 18): *Fire management would continue to be responsive to Forest-wide and management area goals, objectives and standards described in the 1987 Forest Plan* (EA, p. 18).

- 6-9. "Creating a Forest-wide priority of firefighter safety while deemphasizing other Forest values, such as Wilderness and roadless characteristics will inevitably necessitate a Forest-wide objective of fuel reduction activities regardless of where those activities might take place. Forest-wide cumulative impacts from fuel reduction projects, and/or any of the other management options, are a reasonably foreseeable consequence of the amendment that must be analyzed. A failure to do this is a violation of NEPA's requirement for agencies to take a hard look at environmental consequences."

GNF Response: Refer to GNF response to Comments 4-6, 4-11, 4-12 and 6-8.

- 6-10. Comment letter #6 suggests that "an environmental impact statement (EIS) must be performed, providing the following analyses:
1. Disclose all current Gallatin National Forest Plan requirements for logging/burning projects and explain how the Project complies with them;
 2. Disclose the acreages of past, current, and reasonably foreseeable logging, grazing, and road-building activities within the forest;

3. Solicit and disclose comments from the Montana Department of Fish, Wildlife, and Parks regarding the impact of the amendment on wildlife habitat;
4. Solicit and disclose comments from the Montana Department of Environmental Quality regarding the impact of the amendment on water quality;
5. Disclose the biological assessment for the candidate, threatened, or endangered species with potential and/or actual habitat in the Project area;
6. Disclose the biological evaluation for the sensitive and management indicator species with potential and/or actual habitat in the Project area;
7. Disclose the snag densities on the forest, and the method used to determine those densities;
8. Disclose the current and post amendment road densities on the forest;
9. Disclose the Gallatin National Forest's record of compliance with state best management practices regarding stream sedimentation from ground-disturbing management activities;
10. Disclose the Gallatin National Forest's record of compliance with its monitoring requirements as set forth in its Forest Plan;
11. Disclose the Gallatin National Forest's records of compliance with the additional monitoring requirements set forth in previous DN/FONSIs and RODs on the Gallatin National Forest;
12. Disclose the results of the field surveys for threatened, endangered, sensitive, and rare plants in across the forest;
13. Disclose the level of current noxious weed infestations in the Gallatin National Forest and the cause of those infestations;
14. Disclose the impact of the amendment on noxious weed infestations and native plant communities;
15. Disclose the amount of detrimental soil disturbance that currently exists in the Gallatin National Forest from previous logging and grazing activities;
16. Disclose the expected amount of detrimental soil disturbance in the Gallatin National Forest after ground disturbance and prior to any proposed mitigation/remediation;
17. Disclose the expected amount of detrimental soil disturbance in each unit after proposed mitigation/remediation;
18. Disclose the analytical data that supports proposed soil mitigation/remediation measures;
19. Disclose the timeline for implementation;
20. Disclose the funding source for any non-commercial activities proposed;
21. Disclose the current level of old growth forest in each third order drainage in the Gallatin National Forest;
22. Disclose the method used to quantify old growth forest acreages and its rate of error based upon field review of its predictions;
23. Disclose the historic levels of mature and old growth forest in the Gallatin National Forest;
24. Disclose the level of mature and old growth forest necessary to sustain viable populations of dependent wildlife species in the Gallatin National Forest;
25. Disclose the amount of mature and old growth forest that will remain after implementation of the proposed amendment;
26. Disclose the amount of current habitat for old growth and mature forest dependent species in the Gallatin National Forest;
27. Disclose the amount of habitat for old growth and mature forest dependent species that will remain after implementation of the amendment;
28. Disclose the method used to model old growth and mature forest dependent wildlife habitat acreages and its rate of error based upon field review of its predictions;
29. Disclose the amount of big game (moose and elk) hiding cover, winter range, and security currently available in the Gallatin National Forest;
30. Disclose the amount of big game (moose and elk) hiding cover, winter range, and security during implementation of the amendment;

31. Disclose the amount of big game (moose and elk) hiding cover, winter range, and security after implementation of the amendment;
32. Disclose the method used to determine big game hiding cover, winter range, and security, and its rate of error as determined by field review;
33. Disclose and address the concerns expressed by the ID Team in the draft Five-Year Review of the Forest Plan regarding the failure to monitor population trends of MIS, the inadequacy of the Forest Plan old growth standard, and the failure to compile data to establish a reliable inventory of sensitive species on the Forest;
34. Disclose the actions being taken to reduce fuels on private lands adjacent to action areas and how those activities/or lack thereof will impact the efficacy of the activities proposed by this amendment;
35. Disclose the efficacy of the proposed activities at reducing wildfire risk and severity in the Gallatin National Forest in the future, including a two-year, five-year, ten-year, and 20-year projection;
36. Disclose when and how the Gallatin National Forest made the decision to suppress natural wildfire in the forest and replace natural fire with logging and prescribed burning;
37. Disclose the cumulative impacts on the Forest-wide level of the Gallatin National Forest's proposed amendment to effectively replace natural fire with logging and prescribed burning;
38. Disclose how the amendment complies with the Roadless Rule;
39. Disclose the impact of climate change on the efficacy of the amendment;
40. Disclose the impact of the proposed amendment on the carbon storage potential of the area;
41. Disclose the baseline condition, and expected sedimentation during and after activities, for all streams in the area;
42. Disclose maps of the area that show the following elements:
 - a) Past, current, and reasonably foreseeable logging units in the Gallatin National Forest;
 - b) Past, current, and reasonably foreseeable grazing allotments in the Gallatin National Forest;
 - c) Density of human residences within 1.5 miles from the forest boundaries;
 - d) Hiding cover in the Gallatin National Forest according to the Forest Plan definition;
 - e) Old growth forest in the Gallatin National Forest area;
 - f) Big game security areas;
 - g) Moose winter range"

GNF Response to Listed Items 1, 2, 7, 8, 9, 15, 16, 17, 18, 20, 34, 35, 36, 37, 41, 42a, 42b, and 42c:

These 18 items are in reference to logging, grazing, and prescribed burning activities, as well as ground-disturbing activities, of which none of these actions are being proposed in this EA. Therefore, the request for additional analyses is out of the scope of the changes being proposed in the fire management amendment to the Forest Plan.

GNF Response to Listed Item 3, 5, 6, 29, 30, 31, 32, 33, 42d, 42f and 42g: These 11 items requests additional analyses of various wildlife habitat features for sensitive wildlife species, management indicator species, threatened and endangered species, and big game (hiding, winter and security habitats). It is difficult to determine effects of the no action alternative (Alternative 1 - current Forest Plan direction) and the proposed amendment (Alternative 2), due to the uncertainty of where unplanned wildland fire will occur, the fires' intensity, severity, and size. The effects analyses for fish and amphibians are provided in the EA, Chapter 3, section 3.2.2 (EA, p. 46-51). The biological determination of effects concluded that the proposed amendment is expected to have no impact or beneficial impact to Arctic grayling, westslope/Yellowstone cutthroat trout, western pearlshell mussel, boreal toad, northern leopard frog and plains spadefoot (EA, p. 51). The effects analyses of sensitive and management indicator species are provided in the EA,

Chapter 3, section 3.3.1 (EA, p. 59-69). The biological evaluation concluded may impact individual or habitat, but will not likely contribute to a trend towards listing or loss of viability to the populations or species (EA, p. 68). There would be no impact to flammulated owl, trumpeter swan and harlequin duck. The basis for these determinations are provided in the EA, p. 76.

Effects analyses for grizzly bear and Canada lynx are also provided in the EA, Chapter 3, section 3.3.2 (EA, p. 69-84). The US Fish and Wildlife Service has reviewed the Biological Assessment for this effort and concurs with Forest Service biologists' determination that the proposed action is not likely to adversely affect the threatened grizzly bear, the threatened Canada lynx, or designated critical habitat for Canada lynx (EA, p. 84). The basis for the determinations are provided in the EA, p. 84. Potential effects of the proposed amendment to gray wolf is also included in the EA, Chapter 3, section 3.3.3 (EA, p. 84-87). Gray wolves are managed as a non-essential, experimental population under the Endangered Species Act (2005). The determination of effects found that the proposed amendment is not likely to jeopardize the continued existence of this species (EA, p. 86).

GNF Response to Listed Item 4: Effects to water quality are analyzed in the EA, Chapter 3, section 3.2.1 (EA, p. 43-46). As stated in the analysis, there is no difference between the current Forest Plan direction for fire management and those changes proposed in the amendment. Both alternatives would meet and comply with water quality and Clean Water Act laws, policies and Forest Plan direction pertaining to water quality. Under both alternatives, there could be episodic periods of non-compliance with water quality policies due to post-fire rainfall events or snowpack causing accelerated sediment yields.

GNF Response to Listed Items 10 and 11: These two items request disclosure of all records of compliance with Forest Service Monitoring requirements, as well as additional monitoring provided in all previous project decisions on the Gallatin National Forest. This request is not pertinent to the proposed change in management options for an unplanned ignition, and beyond the scope of the proposed amendment because it is impossible to predict the location, size, intensity and severity of an unplanned wildland fire.

GNF Response to Listed Item 12: The comment letter requested the results of all field surveys for threatened, endangered, sensitive and rare plants across the Forest. This request is not pertinent to the proposed change in management options for an unplanned ignition, and beyond the scope of the proposed amendment because it is impossible to predict the location, size, intensity and severity of an unplanned wildland fire. Based on the fact that unplanned wildland fire is inevitable and a natural disturbance process on the landscapes that make up the Greater Yellowstone area, the effects to rare and sensitive plants would not vary by alternative. That being said, the EA does consider potential effects of fire to rare and sensitive plant species listed for the Gallatin National Forest in the EA, Chapter 3, section 3.4.2 (EA, p. 89-92). There are no listed threatened or endangered plant species present on the Forest at this time.

GNF Response to Listed Items 13 and 14: The request for a Forest-wide analysis of current levels of noxious weed infestations and causes of those infestations is beyond the scope of the proposed amendment. Wildland fires can enhance suitable conditions for invasive weeds when fire exposes bare soil and reduces native vegetation, or through fire management actions that result in ground-disturbing activities or vehicle travel. However, it is impossible to predict the location, size, intensity and severity of an unplanned wildland fire. Based on the fact that unplanned wildland fire is inevitable and unpredictable, the EA provides a discussion of the general direct and indirect effects of an unplanned wildland fire in Chapter 3, section 3.4.3 (EA, p. 92-93). Future spread of noxious weeds is anticipated to occur under both Alternative 1 (no action - current Forest Plan direction) and the proposed amendment (Alternative 2). The advantage of the proposed amendment is that fire managers would have the flexibility to consider less invasive fire

management tactics to minimize ground-disturbing activities. Furthermore, the Gallatin National Forest strives to increase awareness and appropriate weed management actions in all resource management actions. The Forest has incorporated various weed management strategies and mitigation practices in the *GNF Resource Advisor's Field Guide* (updated annually), with the goal of providing a proactive approach to invasive weed management when managing any fire incident on the Forest. A copy of this field guide is part of the project file.

GNF Response to Listed Item 19: Implementation of the Final Decision on whether to adopt the proposed amendment or continue with the fire management direction found in the 1987 Forest Plan will be based on the date of the Decision Notice/Finding of No Significant Impact. If the proposed amendment is chosen, the timeline will be from the date of the Final Decision until further notice or as conditions change and the Forest Service deems it necessary to re-examine new fire management strategies.

GNF Response to Listed Items 21, 22, 23, 24, 25, 26, 27, 28 and 42e: These nine items request detailed information and mapping of old growth forest habitats across the Forest, along with additional analyses on old growth-dependent wildlife species. These requests for additional forest-wide analyses has no relevance to the objective of this EA, which is to consider a change from the current fire management direction found in the Forest Plan (which is restrictive and predominately suppression-focused) to allow a wider spectrum of fire management strategies be considered for any unplanned ignition. The location, size, intensity and severity of an unplanned wildland fire are unpredictable. Therefore, to ask for additional analyses concerning: the level and condition of old growth habitat; the amount of old growth habitat forest-wide and by third order drainage; the amount of old growth habitat as it relates to all the wildlife species that depend on this habitat feature; the monitoring methods and the rate of error in that data; and finally all this information pre and post-implementation of all the alternatives considered in detail is beyond the scope of the proposed changes to Forest Plan fire management standards for unplanned wildland fire (lightning-caused fire). All vegetation habitats, including old growth forest, are probable ignition candidates, depending on the flammability of fuel. The proposed amendment would expand the choices of strategies that could be used to manage an unplanned fire. This would provide fire and resource managers the flexibility to implement a response appropriate to an individual set of circumstances and conditions depending on where the fire ignition occurred.

GNF Response to Listed Item 38: Refer to GNF response to Comments 4-5 and 4-12.

GNF Response to Listed Items 39 and 40: The Fire Amendment EA proposes changes to the choices fire and land managers have in terms of how an unplanned wildland fire would be managed. The proposed change is simply whether one or more fire management strategies can be considered for an unplanned wildland fire occurring on National Forest System lands on the Gallatin National Forest. As mentioned in the EA, it is difficult to predict the effects of climatic changes on natural resources, given the variability and complexity of ecosystems and ecological disturbance (EA, p. 111). Climate change may affect fire behavior by lengthening the fire seasons, increasing frequency of lightning fires, increasing drought conditions, and increasing in the amount of acres burned. Westerling et al (2011) studied potential increases in wildland fire due to climate change and effects to vegetation throughout the Greater Yellowstone Ecosystem (GYE). Large, severe fires are normal for the GYE. They suggest that with the expected rise in temperatures caused by climate change, there could be increases in the frequency of large wildland fires in Yellowstone to an unprecedented level. However, this study found that the areas within the GYE which have experienced repeated fires over the years do not currently exhibit any dramatic departure in vegetation, wildlife habitat or large increases in invasive species. Similar to the EA, Westerling et al concluded that anticipating vegetation and fire occurrence shifts under altered climate-fire regimes is complex.

There is very limited empirical data to assess effects of wildfire on carbon sinks. Vegetation and growth is dynamic; so too are carbon pools at a particular site at a particular time. Realizing that the role and occurrence of unplanned wildland fire on the landscape cannot be excluded or eliminated, there will be periodic losses of carbon to fire (Reinhardt and Holsinger 2010). They suggest that the most sustainable and effective approach to forest management is restoration of fire-dependent ecosystems so that they are more resilient to changes in disturbance (wildland fire or insect/disease) under the changing climatic conditions.

- 6-11. "Please consider the impacts of the project to resources and values in the area, especially summer wildlife range, winter wildlife range, other key wildlife range, calving areas, fawning areas, security cover, springs, seeps, wet areas, semi primitive areas or similar areas, partial retention and retention areas or the equivalent, high quality recreational opportunities, hiking, scenery, hunting, fishing, fisheries, areas that are unsuitable for logging, areas where no new roads should be built, and areas where road construction should be built."

GNF Response: The proposed amendment objective is to update the 1987 Forest Plan to current National Fire Management Policies for managing wildland fire. There are no ground-disturbing actions being proposed. It is difficult to determine effects of the no action alternative (Alternative 1 - current Forest Plan direction) and the proposed amendment (Alternative 2), due to the uncertainty of where unplanned wildland fire will occur, the fires' intensity, severity, and size. Based on the fact that unplanned wildland fire is inevitable and a natural disturbance process on the landscapes that make up the Greater Yellowstone area, the effects to all the habitat features and visual and recreation opportunities would not vary by alternative. The request to consider impacts to areas unsuitable to logging, new road construction and new road placement is beyond the scope of this proposed fire amendment EA.

- 6-12. "The EA failed to include an adequate range of alternatives and excluded more viable alternatives. The Gallatin National Forest has made so many amendments to the 1986 Forest Plan that the existing document lacks a significant amount of information..... (Instead of) doing yet more amendments, the agency would make forest planning more user-friendly by simply revising the current plan, an outdated plan that is 25 years old."

GNF Response: This comment was also presented during the June 2009 scoping comments for this EA. As mentioned in the EA (p. 18), the National Forest Management Act (NFMA) has provisions that allow for amending Forest Plans [16 USC 1604(f)(4), 36 CFR 219.10(f), 1982]. The Forest Supervisor concluded that an amendment addressing needed updates and changes to the current Forest Plan direction for unplanned wildland fire management was appropriate based upon the amendment direction provided in 36 CFR 219.10(f). The proposed fire management amendment can be performed in a more appropriate timeframe to respond to National policy, versus an entire Forest Plan revision, which would take several years to complete. Also refer to GNF response to Comments 4-4 and 6-3.

- 6-13. "Fire management should not be homogenized across the Forest, as is being proposed with the elimination of Appendix E which defines different fire management policies for various management areas. This is a violation of the forest planning direction in NFMA, since there are to be different resource emphases for different lands to provide an overall balance of resource management across the Forest. Making fuels reduction the primary emphasis of every acre on the Forest is an NFMA violation since there will be only one primary resource priority across the forest, which in effect will be fuels reduction and logging to protect fire fighters."

GNF Response: Refer to GNF response to Comment 4-14 and 4-15.

- 6-14. "An agency objective that is driving this amendment, and justified through firefighter safety, is to reduce fuel densities." Unfortunately, "fuels" are also wildlife habitat. Thus the ultimate goal

will require the reduction of wildlife habitat. Although these impacts would be addressed at the project level, they also need to be fully addressed at the planning level. If adverse impacts are going to be produced from forest plan direction, this certainly needs to be considered in the development of the amendment. As just a few examples of fuels reduction activities, understory thinning will eliminate a key prey species for lynx, pine marten, goshawks, great gray owls, etc., by reducing snowshoe hares. Forest thinning will have similar impacts by reducing red squirrels. Forest thinning will also reduce conifer cone crops and snags, key aspects of habitat for many, many wildlife species. However, there is no evidence in the EA that these adverse impacts will occur. The EA implies that prescribed burning and fuels reduction is wholly beneficial to wildlife, and thus should be promoted. The agency is white-washing the impacts of increasing inevitable fuels reduction, logging, and burning projects.”

GNF Response: These comments are not applicable to this EA and the proposed amendment to update fire management direction in the Forest Plan. The Fire Management Amendment EA does not propose any fuel reduction actions or forest thinning actions. As stated in the EA, Chapter 1, the intent of the proposed amendment is to provide the fire manager with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire. These comments are not pertinent to the proposed change in management options for an unplanned ignition, and beyond the scope of the proposed amendment.

- 6-15. “The objective to reduce natural wildfires, and instead have smaller areas of forest thinning/fuels reduction, was not discussed in regards to snag habitat and coarse woody debris availability on many wildlife species. How will the role of large severe wild fires be replaced by the proposed management activities in the amendment?”

GNF Response: Refer to GNF response to Comments 4-24 and 4-25, which express identical concerns.

- 6-16. “The EA implies that prescribed fire will improve wildlife habitat, while natural fire will not. The details for these conclusions were never provided. In addition, activities associated with fuels reduction burning, such as slashing of smaller trees, fire lines, disturbances associated with burning, on sensitive wildlife habitats (e.g., spring calving/fawning habitat for big game, winter ranges for big game, security areas for big game, grizzly bears, loss of understory vegetation for wildlife, loss of large logs and snags) were not addressed in the EA. The EA suggests that this increased fuels reduction program is needed by wildlife and will be highly beneficial, but the benefits were never clearly articulated or the costs clearly identified or considered.”

GNF Response: Refer to GNF response to Comments 4-26 and 4-27, which express identical comments.

- 6-17. “The EA implies that the fire amendment will result in increased age and size class diversity on the forest. In effect, the amendment will reduce older forest habitat and increase habitat fragmentation for wildlife. It is unclear why this should be a forest-wide objective, to degrade wildlife habitat. The most vulnerable wildlife species are associated with large tracts of older forest habitat, so the proposed amendment will have a negative impact on these most vulnerable wildlife species. The EA did not identify this problem, or define why habitat loss for a large suite of vulnerable wildlife should be a Forest-wide objective, in violation of NEPA and NFMA.”

GNF Response: Refer to GNF response to Comment 4-16, which express identical comments.

- 6-18. “We are requesting a more comprehensive effects analyses for each of the proposed activities on all applicable management indicator species. What is the species-specific habitat losses expected to occur as a result of implementing each alternative? We request projections of

effects on these species both site-specifically and in regards to habitat forest-wide as a result of the proposal. The analysis should show that the indicator species identified are in fact appropriate indicators of environmental changes in these areas for this type of project. “

GNF Response: The analyses of potential effects to MIS, listed for the Gallatin National Forest, are provided in Chapter 3 of the EA (p. 63-69). Alternative 1 is the no action alternative, which means that the fire management direction provided in the 1987 Forest Plan remains the direction and strategies options that can be considered when managing an unplanned wildland fire. Predominately, fire suppression is the management strategy to be used. The proposed amendment (Alternative 2) would change fire management direction broadening the choices of fire management strategies to be considered for unplanned wildland fire. Since the Forest Service cannot predetermine when and where a lightning fire will occur, and whether or not a strike will actually ignite a fire, site-specific effects cannot be determined.

- 6-19. “We request that studies address the related issues of “population viability” and “distribution throughout its geographic range” in regards to all species of concern, in order to comply with USDA Regulation 9500-4 and 36 CFR 219.19. To adequately analyze population viability, you must explicitly consider population dynamics. The District should fully analyze population growth rate, population size, linkages to other populations, and the dynamics of other populations in examining population dynamics.”

GNF Response: This request to address population viability, population dynamics and distribution of all species of concern is beyond the scope of the proposed fire management amendment EA. The intent of the proposed amendment is to provide the fire manager, district rangers and their resource specialists, a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire across the entire Forest. This request is not pertinent to the proposed change in management options for an unplanned ignition, and beyond the scope of the proposed amendment.

- 6-20. “ (The) analysis should establish that the species in the forest are still part of viable populations in the surrounding landscape following the impacts from past development actions on lands of all ownership. The analysis should be expanded to include a cumulative effects analysis area that would include truly viable populations. Identification of viable populations must be done at some geographic scale. This means if the analysis cannot identify viable populations of MIS and TES species of which the individuals in the analysis area are members, the analysis fails to assure the maintenance of viable populations and falls far short of meeting the requirements of a scientifically sound “ecosystem” analysis.

GNF Response: Refer to GNF response to Comments 4-20, 6-18 and 6-19.

- 6-21. “Please disclose the results of up-to-date monitoring of fish habitat and watershed conditions, as required by the Forest Plan.”

GNF Response: This request has no relevance to the proposed changes to the Forest Plan fire management options for unplanned wildland fire (naturally-ignited fire). As stated in the EA, Chapter 1, the proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide the fire manager with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire.

- 6-22. “The continued fragmentation of the forest also needs to be a major analysis issue for this proposal. That is, the size of blocks of interior forest that existed historically before management actions were initiated needs to be a point of comparison with both the present condition and in terms of all action alternatives. This should be a landscape ecology-type analysis, which looks at the larger picture of the fragmentation of habitat in surrounding

concentric circles. Will the proposed alternatives tend to further fragment the habitat for plants and other wildlife, given the already fragmented landscape from past logging and road building activities? Disclose whether past management actions have extirpated or significantly reduced any plant or animal species from the analysis area. Disclose how combined past management actions have affected or reduced the diversity of habitat types in the analysis area and the region.”

GNF Response: The fire management amendment proposes to update the 1987 Forest Plan direction for fire management to comply with National wildland fire management policy. The amendment does not propose activities, such as vegetation treatments, logging, prescribed burning, etc. that would potentially result in fragmentation concerns. This request has no connection or relevance to the proposed changes to the Forest Plan fire management options for unplanned wildland fire (naturally-ignited fire).

- 6-23. “We ask that the FS utilize the Roads Analysis Process and analyze travel management, including road obliteration, and include an alternative that would not leave any deferred or outstanding maintenance needs/BMP upgrades in analysis area watersheds.”

GNF Response: This request has no relevance to the proposed changes to fire management direction found in the 1987 Forest Plan because there is no road construction, road obliteration or any other actions related to travel management being proposed in this proposed amendment.

- 6-24. “We oppose the building of any new or temporary roads that could be allowed by this amendment.”

GNF Response: Similar to GNF response to Comment 6-23, this comment has no relevance to the proposed changes to fire management direction found in the 1987 Forest Plan. There are no new or temporary road construction being proposed in this proposed amendment.

- 6-25. “The NEPA document should thoroughly detail the amendment’s affect on both designated old growth and stands with old growth characteristics. All stands should be ground checked for old growth attributes. The relation of the stands to the landscape scale network of old growth stands should be considered. Impacts of this project on old growth should be disclosed. Please disclose how this amendment relates to old-growth criteria.”

GNF Response: Refer to GNF response to Comment 6-10, items 21, 22, 23, 24, 25, 26, 27, 28 and 42e.

- 6-26. “The determination that the reduction of natural wildfire on the landscape is not an adverse impact on lynx or lynx habitat is arbitrary and capricious. It is not clear how the Forest Service came to this conclusion. To the contrary, an attempt to reduce natural fires is an adverse impact on lynx, an impact that should be addressed via formal consultation with the USFWS. “

GNF Response: Refer to GNF response to Comment 4-20. The BA concluded that the proposed fire management amendment may effect, but is not likely to adversely affect the Canada lynx or critical lynx habitat (EA, p. 84). The USFWS has reviewed the BA for this proposal and concurs with the Forest Service biologist’s assessment determination.

- 6-27. “The determination that the amendment would not adversely affect the threatened grizzly bear is arbitrary and capricious. The disturbance of security areas for the grizzly bear will be an adverse impact, which requires formal consultation to allow the taking that will result. Roads are the leading cause of grizzly mortalities.”

GNF Response: There are no ground-disturbing actions or activities, such as road building, being proposed in the fire management amendment. Refer to GNF response to Comments 4-21, 6-23 and 6-24.

- 6-28. “An EIS must analyze how a full spectrum of fire management strategies and options will impact grizzly bears, particularly given that the primary objective of this amendment will likely be fuel reduction activities in the name of firefighter safety. “

GNF Response: The fire management amendment does not propose any fuel reduction activities. It proposes to update the 1987 Forest Plan direction for fire management to comply with National wildland fire management policy and expand the choices fire managers and line officers have to manage an unplanned wildland fire (lightning-caused fire). Therefore, this request has no connection or relevance to the proposed changes to the Forest Plan fire management options for unplanned wildland fire (naturally-ignited fire). The Biological Assessment (BA) for the proposed amendment analyzed potential effects to all threatened and endangered wildlife species, including grizzly bear (EA, p. 69-76). The BA and proposed amendment has been reviewed by the US Fish and Wildlife Service, with their concurrence that the proposed action is not likely to adversely affect the threatened grizzly bear (USDI-FWS Concurrence Letter 2011).

- 6-29. “The EA refers often to the Grizzly Bear Conservation Strategy in defining how increased burning/logging to reduce fuels in unroaded lands that provide security for the grizzly bear. This strategy does not apply to bear management since the bear is currently listed as a threatened species. So it is not clear why this strategy is being used to define project impacts, or mitigation measures for a loss of security that will occur with increased management of unroaded secure habitat for the grizzly bear.”

GNF Response: This request to address “increased burning/logging to reduce fuels in unroaded lands that provide security for the grizzly bear” is beyond the scope of the proposed fire management amendment EA. The intent of the proposed amendment is to provide the fire manager, district rangers and their resource specialists, a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire. This request is not pertinent to the proposed change in management options for an unplanned ignition, and beyond the scope of the proposed amendment. This EA makes no reference to the Grizzly Bear Strategy in defining how increased burning/logging to reduce fuels in unroaded lands. This comment is not relevant to the changes in fire management direction in the proposed amendment.

- 6-30. “We request that a full EIS be completed for this amendment because of the impacts on the Endangered Species Act listed Canadian lynx, and grizzly bear.”

GNF Response: The analyses disclosing potential effects to Canada lynx, designated critical lynx habitat and grizzly bear are provided in Chapter 3.3.2 Threatened and Endangered Wildlife Species section (EA, pages 69-84). Refer to GNF response to Comments 4-20, 4-21 and 6-10, items 3, 5, 6, 29, 30-33, 42d, 42f and 42g. The US Fish and Wildlife Service has reviewed the Biological Assessment for this effort and concurs with Forest Service biologists’ determination that the proposed action is not likely to adversely affect the threatened grizzly bear, the threatened Canada lynx, or designated critical habitat for Canada lynx (EA, p. 84; USDI-FWS letter 2011).

- 6-31. “The EA implies that there has been an interruption of natural fire cycles, even though some of the literature cited in the bibliography includes papers that demonstrate the opposite. And the EA notes that many fires in the past have not been controllable, which is exactly the case for large fires. (The) agency’s claims regarding interrupted fire cycles means the NEPA analysis is flawed, since this is the basis of the proposed amendment. The Forest Service must use high-quality information and accurate scientific analysis in its NEPA analysis and must disclose relevant shortcomings in data or analysis. 40 C.F.R. §1500.1(b); 40 C.F.R. § 1502.22; *Lands Council v. Vaught*, 198 F.Supp.2d 1211, 1239 (E.D. Wash. 2002). “

GNF Response: Refer to GNF response to Comment 4-8 and 4-9.

6-32. "There was no analysis in the EA regarding specifically why, if a fire cycle is currently longer than what is clearly a variable fire history given climatic fluctuations, etc., why this has been detrimental and to which wildlife species. The inference is that the current habitat is degraded due to a lack of wildfires, when no supporting documentation was provided. The inference is that the agency will correct these degraded ecosystems due to a lack of fire by increasing burning, without providing any actual support as to why this amendment is needed. Please discuss all the recent publications on fire cycles and define specifically why wildlife habitat has been degraded due to a lack of fire. The constant references to "increased diversity" that will occur with more prescribed burning is far too vague to provide the public with any information on why habitat is currently degraded."

GNF Response: Refer to GNF response to Comments 4-9 and 4-10.

6-33. "The EA also failed to define why it is necessary to change historic fire patterns of large wildfires to a different pattern of smaller fires. Since the large fires were a natural pattern, why does the agency believe that this natural pattern needs to be changed? What exactly is the purpose of changing this historic pattern, provided that it can actually be accomplished, which is doubtful."

GNF Response: Refer to GNF response to Comment 4-17.

6-34. "The EA listed numerous science reports in the bibliography, however did not clearly connect these papers with the agency's claim that current fires are unnatural. At best, this is a controversial claim and both sides of the issue need to be fully addressed. To satisfy NEPA, this must be full and clearly disclosed in the final EA so that the science indicating natural fire cycles on the Gallatin Forest have not been altered is a plausible hypothesis."

GNF Response: Refer to GNF response to Comments 4-8, 4-9 and 6-31.

6-35. "The EA also fails to deal with the fuels issue on the appropriate temporal scale. The EA theorizes fire behavior at some short-duration fixed time period following treatment (ignoring the heightened fuel risk due to the logging activities) but doesn't consider the fact that vegetation response to the proposed activities will be rapid in the understory and also significant for smaller tree growth in the years following treatment. How those vegetation changes would affect fire behavior when one of any number of possible fire scenarios plays out on the land in the foreseeable future is also glossed over in the EA's analyses."

GNF Response: There are no fuel treatments, vegetation treatments or ground-disturbing actions being proposed in this EA.

6-36. "Since this amendment was not a planning scenario dealt with during Forest Plan development, both the project-level and programmatic ecological and economic costs and impacts go unexplained and undisclosed. The Gallatin NF must disclose to the public just how much of the Forest is considered to be likewise "out of whack" in alleged "forest health" terms and more importantly, disclose how much of the Forest is to be treated for fuel reduction in a manner that emphasizes fuel conditions over native ecological processes."

GNF Response: There are no fuel management activities being proposed in this EA. The EA provides information and effects analyses relevant to changing the current direction for fire management as found in the Forest Plan to respond better to National wildland fire management directions.

6-37. "Published scientific reports indicate that the logging and burning prescriptions will actually increase fire severity -- *not* reduce fire severity -- as assumed by the Forest Service. Because this issue is the central underlying theme that is critical to support the proposed amendment, the Forest Service must candidly disclose, consider, and fully discuss the published scientific papers that analyze whether commercial logging is an effective means of fire suppression. The Forest

Service should have discussed *published* scientific papers, which make findings *based on actual studies*, not simply on models. In the analysis, the Forest Service should have at least addressed the issues of (a) which studies are applicable to lodgepole pine forests, (b) whether logging large diameter trees helps or hinders efforts to reduce fire risk, (c) whether logging without prescribed burning helps or hinders efforts to fire risk, and (d) whether all small diameter trees must be removed in order to reduce fire risk. In this analysis, the Forest Service should not include internally produced, unpublished documents written by land managers. These types of documents are biased in favor of logging, and therefore not scientifically reliable. See Ruggiero (2007)(discussing the fact that land managers are part of a different branch of the Forest Service than research scientists, and the position of the land managers implies that they are not independent of policy decisions, and therefore may not be scientifically credible). The Forest Service should disclose and discuss the findings of – at least – the following studies:

Raymond, Crystal L. & David L. Peterson. 2005. *Fuel treatments alter the effects of wildfire in a mixed evergreen forest, Oregon, USA*. Canadian Journal of Forestry Research 35: 2981 – 2995; and

Odion, Dennis C., Evan J. Frost, James R Strittholt, Hong Jiang, Dominick A. Dellasala, Max A. Moritz. 2004. *Patterns of fire severity and forest conditions in the western Klamath Mountains, California*. Conservation Biology 18:4: 927-936.”

GNF Response: No vegetation treatments, fuel management treatments or ground-disturbing activities are being proposed in this amendment. The request for the Forest Service to respond to a wide variety of research is beyond the scope of this proposed amendment and not relevant to this EA, which proposes changes to the fire management direction found in the Forest Plan. The request that the Forest Service address a variety of research dealing with logging and prescribed burning research is also beyond the scope of this proposed amendment.

- 6- 38. This comment letter cites Hayward 1994, which theorizes: “Current efforts to put management impacts into a historic context seen to focus almost exclusively on what amounts to a snapshot of vegetation history...(The) value of the historic information lies in the perspective it can provide on the potential variation.”

“We (question) the entire manipulate and control regime, as represented in the EA. The managed portion of the Gallatin National Forest has been fundamentally changed, as has the climate, so the Forest Service must analyze how much land has been fundamentally changed forest wide compared to historic conditions, and disclose such information to the public in the context of an EIS by completing the Forest Plan Revision process.”

GNF Response: See GNF response to Comment 6-37.

- 6-39. “The EA takes a very narrow, simplistic view of the science on fuel reduction and ignores scientific information that argues against its conclusions. The EA must be re- written to acknowledge the controversies, and remove its already-made decision biases. “ The comment letter provides numerous citations from Huff et al (1995), DellaSalla et al (1995), Veblan (2003), Graham et al (1999) and Cohen and Butler (2005). These citations focus on forest management and fuel reduction practices (thinning, residual fuel management after logging, regeneration after logging, pre and post-fuel and fire behavior after logging; and salvage logging), and management of the home ignition zones and community protection zones within the wildland urban interface. The comment letter further states: “It seems that this amendment is a part of a wider, continuing indiscriminate fuel reduction strategy, without consideration of sensible wildland fire use—elevating the odds for the type of extreme events most feared. “

GNF Response: Ironically the comments provided in this letter emphasize the desire to not exclude wildland fire, yet the rest of the comments indicate the opposite. As stated throughout

the EA, there are no vegetation treatments, fuel management treatments or ground-disturbing activities are being proposed in this amendment. Therefore, their comments are not relevant to this EA which proposes changes to the fire management direction found in the Forest Plan. The request that the Forest Service address a variety of research dealing with logging and prescribed burning, which is not being proposed, is beyond the scope of this proposed amendment. Refer to GNF response to Comments 6-37 and 6-38.

- 6-40. "None of the cumulative effects discussions adequately discloses the effects of past management activities in a logically-defined analysis area, on land of any ownership, to the issue of how those projects have affected the fuel situation now referred to as "hazardous." How have past and ongoing logging and other management activities across this landscape affected fuel conditions and the "forest health" issues alleged by the EA? We know that old high grade and clearcut-type logging leads directly to vegetative conditions that are not natural and present an elevated (above natural) risk of fire."

GNF Response: There are no proposed actions that include vegetation or fuel management in this EA. Furthermore, there is no reference to or analysis provided on "forest health" issues. There is also no proposal to utilize high grade and clearcut logging in this proposed fire management amendment. Therefore, this comment is beyond the scope or goal of the proposed amendment.

- 6-41. "Yet nowhere does the EA present a thorough cumulative effects discussion about past management in relation to its "Purpose and Need" in violation of NEPA, NFPA and the APA. It is time for the Forest Service to be more honest with the public about Fire ecology and move away from trying to prevent and suppress wildfire as one of its primary occupations."

GNF Response: It is impossible to predict the location, size, intensity and severity of an unplanned wildland fire. Based on the fact that unplanned wildland fire is inevitable and unpredictable, the EA provides general discussions of the direct, indirect and cumulative effects of an unplanned wildland fire in Chapter 3.

The comment letter states the need to "move away from trying to prevent and suppress wildfire as one of its primary occupations". The intent of the proposed amendment is to provide the fire manager, district rangers and their resource specialists, a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire. The proposed amendment outlines the desire by the FS to consider opportunities to allow a naturally-ignited fire to play a more natural role on the landscape when and where appropriate as long as firefighter and public safety can be maintained.

Refer to GNF response to Comment 6-3, which discusses compliance with NEPA, NFMA and APA.

- 6-42. "We object strongly to the purpose of this amendment, which is clearly to allow prescribed burning, or "active management" within MA 4 areas, which include existing wilderness areas, wilderness study areas, and research natural areas. Inventories roadless lands were not discussed in the EA, but these would likely also be targeted for increased planned burning. The purpose of all these areas is to have natural landscapes free of interference from human activities. The agency has plenty of acres on the Forest of 1,816,030 acres to do prescribed burning, or active management. The proposed amendment is a clear violation of the Wilderness Act and the Roadless Area Conservation Rule since it would allow unnatural, rather than natural, management of these protected lands. This amendment is therefore illegal, since it conflicts with existing laws and the Roadless Area Conservation Rule, as well as the management of RNAs and SIAs."

GNF Response: Management Area 4 includes the Gallatin National Forest portions of the Absaroka Beartooth and Lee Metcalf wilderness areas, plus the Lionhead and Republic Mountain recommended wilderness areas (FP, p. III-10). The 1964 Wilderness Act and Forest Service Manual

2324 provide direction, which is found in the 1987 Gallatin Forest Plan, for management of fire (unplanned and planned) in designated wilderness areas. There would be no changes to current wildland or prescribed fire management within designated and recommended Wilderness areas under the no action alternative (Alternative 1 - current Forest Plan direction) or the proposed fire amendment (Alternative 2) (EA, p. 99).

MA 4 does not include the wilderness study area or research natural areas. Refer to GNF response to Comments 4-1. Inventoried roadless areas were not analyzed in detail under this proposed amendment because the fire management within inventoried roadless areas is governed by the standards described in the Forest Plan under individual management areas which are situated in inventoried roadless areas. Refer to GNF response to Comments 4-5, 4-11, 4-12 and 4-13.

- 6-43. "The EA fails to meet the requirements of the National Environmental Policy Act for analysis and disclosure of adverse environmental impacts on unroaded areas. The amendment will allow logging and burning in unroaded areas adjacent to inventoried roadless areas. The EA failed to analyze significant resources the agency has repeatedly acknowledged are associated with those areas. In addition it does not disclose the irreversible and irretrievable commitment of resources caused by logging activities in these areas, particularly unroaded areas contiguous to inventoried roadless areas.

NEPA requires that the analysis reveal:

- (i) the environmental impact of the proposed action,
- (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented,
- (v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented."

GNF Response: The fire management amendment proposes to update the 1987 Forest Plan direction for fire management to comply with National wildland fire management policy. The amendment does not propose activities, such as vegetation treatments, logging, prescribed burning or any other ground-disturbing actions. As stated in the EA, Chapter 1, the proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide the fire manager with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire. Therefore, this request has no connection or relevance to the proposed changes to the Forest Plan fire management options for unplanned wildland fire (naturally-ignited fire).

- 6-44. "Due to the ecological importance of roadless areas, neither logging nor road building should occur in uninventoried roadless areas. The potential for logging and road building to impact both inventoried and uninventoried roadless area should be thoroughly analyzed. "

GNF Response: This EA does not propose any harvesting or road construction actions. As stated in the EA, Chapter 1, the proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide the fire manager with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire. Therefore, this request has no connection or relevance to the proposed changes to the overall Forest Plan fire management direction in regards to management options for unplanned wildland fire (naturally-ignited fire). Refer to GNF response to Comment 4-2.

- 6-45. The impacts of prescribed fire should be carefully evaluated. While fire is a natural and essential process in ecosystems, human induced fire can often differ drastically from natural fire. We are particularly concerned with the impacts of prescribed fire on the ecological integrity of the

roadless areas. Recent research recommends caution in applying prescribed fire to obtain desired forest conditions. ... (The) NEPA document should thoroughly analyze impacts to these resources.”

GNF Response: This comment letter cites Tiedemann et al 2000, which suggests, “(a) more conservative approach until prescribed fire effects are better understood” *Ibid*. There are no prescribed burning actions being proposed in this EA.

- 6-46. “The agency’s attempt to make fire fighter safety the “primary” management objective on every acre of National Forest Lands is unacceptable. This is simply a means of justifying fuels reduction activities on every acre, regardless of impacts on other resources, and basically nullifies the purpose of a Forest Plan, which is to ensure proper resource management. Any logging project is currently called a “fuels reduction project.” Thus the fire amendment is making logging the primary management activity on the entire forest, since fuels reduction projects are justified on the basis that they increase fire fighter safety. Every project released by the forest in the last several years has had this justification in the NEPA analysis.”

GNF Response: Refer to GNF response to Comment 4-6 and 4-7, which are identical to these comments.

- 6-47. “*Goal to Reduce Suppression Costs.* There was no economic assessment of how prescribed burning will affect wildfire suppression costs. The assumption is that the agency can reduce wildfires by increasing prescribed burning, which was not supported by any science. In addition, there are other options to reducing fire suppression costs, such as unnecessary control activities, etc. If this is an important reason for the amendment, there are certainly many other options/alternatives to address this problem, options that may also be more effective. The alternatives to addressing suppression costs are too limited to make a reasoned decision on this problem.”

This comment letter goes further to request a complete cost benefit estimate as required by NFMA and NEPA and the Forest Plan, claiming: “These laws require the Forest Service prior to project implementation to assess for potential physical, biological, aesthetic, cultural, engineering, and economic impacts and for consistency with multiple uses planned for the general area based on the best available science. NFMA and the Forest Plan require accurate documentation of costs associated with carrying out the planned management prescriptions as compared with costs estimated in the forest plan. The GAO reports and the EA state this is not being done.”

GNF Response: This request has no relevance to the proposed changes to fire management direction for unplanned wildland fire as found in the 1987 Forest Plan. There are no prescribed burning activities being planned in this proposed amendment. Furthermore, the EA does not address or claim any of the assumptions as stated in this comment.

- 6-48. “Section 303(d) of the CWA (33 USC §1313(d)) requires that states list water quality limited segments of bodies of water within its jurisdiction. The listed segments are not meeting state water quality standards or failing to meet designated uses due to identified reasons. (TMDLs) are designed to address all sources of pollution limiting the water quality of the public waters and should include point and non-point sources of pollution, such as sediment generated from logging activities. Ford Creek is on the 303d list of impaired water bodies is still not meeting state water quality standards. The Forest Service has a duty to avoid further degradation of WQLS stream segments and to clean up streams so they can be removed from the impaired list.

“A TMDL needs to be in place for all WQLS streams and rivers in the Forest before a Record of Decision is signed. It is not possible to know how this amendment will affect impaired water bodies until TMDLs are completed. Remaining at a non-functioning condition and or adding of

sediment to WQLS water bodies that are already compromised in their water quality does nothing to move toward remedying the water quality violations and adverse affects on attainment of beneficial uses.”

GNF Response: This comment letter cites the Ford Creek TMDL, which resides on the Rocky Mountain Front District of the Lewis and Clark National Forest. This creek is a tributary to the Missouri-Sun-Smith watershed TMDL (Story, personal communication 2011). Therefore, this request has no relevance to the proposed changes to fire management direction for unplanned wildland fire as found in the 1987 Forest Plan and beyond the scope of this amendment effort.

- 6-49. “An EA must adequately address the impact of proposed project and actions on climate change. *Center for Biological Diversity v. NHTSA*, 2007 WL 3378240 (9th Cir. Nov. 15, 2007). See also *NRDC v. Kempthorne*, 2007 WL 1623826 (June 1, 2007)(holding that a biological opinion is inadequate if it does not address climate change).

“Perhaps nowhere is the abandonment of forest planning principles more evident than in the EA’s discussion and assessment of climate change as it relates to proposed wildfire management strategies. It will take more than “...managing forests so that they become more resilient to drought and insect/disease outbreaks...” to adequately respond to our changing climate. “

GNF Response: Refer to GNF response to Comment 6-10, items 39 and 40. As mentioned in the EA, it is difficult to predict the effects of climatic changes on natural resources, given the variability and complexity of ecosystems and ecological disturbance (EA, p. 111). The Fire Amendment EA proposes changes to the choices fire and land managers have in terms of how an unplanned wildland fire would be managed. The proposed change is simply whether one or more fire management strategies can be considered for an unplanned wildland fire occurring on National Forest System lands on the Gallatin National Forest. Since the Forest Service cannot predetermine when and where a lightning fire will occur, and whether or not a strike will actually ignite a fire, site-specific impacts of unplanned wildland fire cannot be determined.

- 6-50. “There are new, climate-linked lines of evidence that exist in trends on lands administered by the Gallatin NF, USFS-USDA. Because of these multiple and consistent lines of compelling scientific evidence, climatic changes are already bringing new, unforeseen levels of uncertainty about sustained yield to forested acreage managed by the Forest Service. These changes should a) be acknowledged, and b) require the agency to declare that its current sustained yield estimates are subject to significant uncertainty and overestimation.”

GNF Response: Refer to GNF response to Comment 6-49.

- 6-51. “We respectfully request that the Forest Service immediately issue a public disclosure statement of uncertainty/overestimation, and begin to revise its Regional Guides and Long-range Management Plans (LRMPs), including the Gallatin NF Plan, accordingly. This revision should take the form of a programmatic Environmental Impact Statement (EIS), pursuant to the provisions of NEPA and NFMA.”

GNF Response: This request is beyond the scope of the proposed changes to the overall Forest Plan fire management direction for unplanned wildland fire (naturally-ignited fire). Refer to GNF response to Comments 4-4 and 6-3.

- 6-52. “The amount of detrimental soil disturbance would increase with the implementation of the amendment, therefore soil productivity would be reduced. Some activities, such as log landing construction and intensive log skidding would essentially permanently reduce the productivity of the soil on those sites directly affected.

“Please perform a cumulative effects analysis for detrimental soil damage that would accrue with the logging, the “temporary” roads, nonsystem roads, and livestock grazing in the area. The

R-1 Soil Quality Standards require that the FS quantify all such detrimental disturbance within logically-defined Activity Areas.

“The intent of the R-1 Soil Quality Standards is that the FS must, in each case, consider the cumulative effects of both past and proposed soil disturbances to assure the desired soil conditions are met. This includes impacts from activities that include logging, firewood gathering, livestock grazing, and motorized recreation impacts.

“The only way for there to be any meaning to the numerical standards in cases where logging is proposed over previously disturbed soils and where activity area boundaries are not kept constant is if a qualified soil scientist actually performs site-specific field measurements to measure the existing percentages of detrimental soil disturbance within the already-established boundaries of activity areas, and within newly-established activity areas. Will the FS utilize the services of a soil scientist?

“Please provide estimates of current detrimental disturbance in all previously established activity areas in the watersheds affected by the proposal.

“Please disclose the link between current and cumulative soil disturbance in forest watersheds to the current and cumulative impacts on water quantity and quality.

“Please consider the implications of all land type limitations for detrimental soil impacts. Some of these land types may have “moderate” or “severe” soil erosion and sediment hazard potential, and soil erosion or mass wasting (a severe form of erosion) are both kinds of detrimental impacts. The FS must consider which proposed activity areas fall into which land types, and therefore might be more at risk for erosion or other detrimental impacts that decrease soil productivity. Please disclose the results of monitoring of past actions on these various land types that would reveal the differential levels of soil impacts of the various logging activities carried out in the past (and now proposed with this new project).

“It is clear that the intent of the Regional Soil Quality Standards is that the FS must, in each case, consider the cumulative effects of both past and proposed soil disturbances to assure that soil productivity will be maintained. This includes impacts from activities that include logging, motorized vehicle use, etc.

“Please disclose how the proposed amendment would be consistent with Graham, et al., 1994 recommendations for fine and coarse woody debris, a necessary consideration for sustaining long-term soil productivity.”

GNF Response: All comments and referenced citations provided in this letter focus on past and potential soil disturbance from landing construction, logging and skidding activities, temporary road construction, and livestock grazing - none of which are being proposed in the fire management amendment EA. Therefore, these requests have no relevance to the proposed changes to fire management direction for unplanned wildland fire as found in the 1987 Forest Plan.

6-53. “ It is important that the results of past monitoring be incorporated into planning. All Interdisciplinary Team Members should be familiar with the results of all past monitoring pertinent to the project area watersheds, and any deficiencies of monitoring that have been previously committed to. For that reason, we expect that the following be included in the NEPA documents or project files:

- A list of all past projects (completed or ongoing) implemented in the proposed project area watersheds.
- The results of all monitoring done in the project area as committed to in the NEPA documents of those past projects.

- The results of all monitoring done in the proposed project area as a part of the Forest Plan monitoring and evaluation effort.
- A description of any monitoring, specified in those past project NEPA documents or the Forest Plan for proposed project area, which has yet to be gathered and/or reported.

GNF Response: These requests are not pertinent to the proposed change in management options for an unplanned ignition, and beyond the scope of the proposed amendment. It is impossible to predict the location, size, intensity and severity of an unplanned wildland fire. As stated in the EA, Chapter 1, the proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide the fire manager with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire.

- 6-54. “Please disclose the name of any other past logging projects (implemented during the life of the Forest Plan) whose analysis area(s) encompass the areas to be logged under this proposal. Please disclose if the FS has performed all of the monitoring and mitigation required or recommended in any NEPA documents, and the results of the monitoring. Lacking such knowledge, justification for use of a CE is missing.

GNF Response: This document is not a Categorical Exclusion; nor is there any logging being proposed in this amendment EA. Therefore, the Forest Service has determined that this request has no relevance to the proposed changes to fire management direction for unplanned wildland fire as found in the 1987 Forest Plan.

- 6-55. “... (the) FS must consider the cumulative effects of activities on land of all ownerships in or adjacent to the affected watersheds.” This comment refer to the cumulative effects as defined by NEPA at 40 C.F.R. 1508.7: . . . the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future action regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (emphasis added).

GNF Response: Cumulative effects are discussed in each resource topic in Chapter 3. It must be noted that cumulative effects are difficult to define and discuss because it is impossible to predict where an unplanned natural-ignition (i.e., lightning strike) will occur. Refer to GNF response to Comments 6-8, 6-40 ad 6-41.

- 7-1. “...(it) is not easy to understand the scope of the proposal from a thorough review of the EA and accompanying exhibits. On the surface, the EA and amendment appear to be limited in scope. Most of the discussion and analysis directs the reader’s focus to various Forest Service responses to planned and unplanned wildfire. Taken at face value, there is no obvious, compelling need for a Plan Amendment or EA.”

GNF Response: The proposed fire management amendment (Alternative 2) is limited to changing the fire management direction found in the Forest Plan to expand the options that fire managers can consider for any unplanned ignition, thus responding to the current National wildland fire management policies. The current Forest Plan direction limits the management options/strategies for an unplanned fire to full suppression or perimeter control of a fire in most management areas. MA 4 (wilderness and recommended wilderness) is the exception, where the full range of fire management strategies can be considered for any unplanned ignition, when and where appropriate, within the wilderness boundaries. The proposed Alternative 2 would expand fire management considerations on National Forest System lands across the entire Gallatin National Forest, and would include a variety of management options ranging from full perimeter control to using fire to achieve resource objectives, and all combinations in between. There is no change to

direction and guidance for using prescribed fire as provided in the current Forest Plan direction and the two wilderness area fire guidebooks.

The EA proposes replacing the general direction found in the 1987 Forest Plan concerning use of prescribed fire with the more detailed guidance found in the two wilderness fire management guidebooks (EA, p. 10, 16 and 20). The two wilderness area guidebooks went through a public review process. Details are as follows:

From the 1987 Forest Plan, MA 4 (p. III-12) - *The use of scheduled prescribed fire in Wilderness will be consistent with National Forest policy.*

Replace with guidance found in the two Wilderness Fire Management Guidebooks, which are already in practice (Absaroka Beartooth Wilderness guidebook, p. 49; Lee Metcalf Wilderness guidebook, p. VI-1) -

The objectives of fuel treatments within MA4 would include: permit fire to play, as nearly as possible, its natural ecological role on the landscape; reduce, to an acceptable level, the risks and consequences of wildland fire within wilderness or escaping from wilderness; and, allow fire to move into and out of wilderness boundaries as necessary based on the historic burning patterns, ecological health, impacts to abiotic and biotic components of the wilderness.

The acceptable methods of fuel management treatment that may be used to reduce the risk to these protected areas include: planned ignition and/or mechanical fuel manipulations outside of wilderness boundaries; planned ignitions outside of wilderness boundaries that burn into wilderness where wilderness management objectives and conditions are met; planned ignitions inside of wilderness boundaries that burn out of the boundary where wilderness management objectives and conditions are met; and, planned ignitions within the wilderness boundary where wilderness management objectives and conditions are met.

- 7-2. "Within the EA is imbedded a "full spectrum of fire management strategies and options..." EA, p. 10. What does this mean? The next 100 pages really never get around to disclosing exactly what "full spectrum" means. There is no list of possible management options, and no specific locations or conditions identified for any of the possible specific management options. This kind of non-specific, non-disclosure – downright vague, actually – is unacceptable from a NEPA/NFMA disclosure perspective. Why not just come right out and tell the public what the Forest Service, a federal public agency, wants to do on federal public lands? And how much of it do you want to do? A lot, we suspect."

GNF Response: Refer to GNF response to Comment 6-6. As stated in the EA, the proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action because it deals with the management of unplanned wildland fire (lightning-caused fire). Unplanned wildland fire is considered an "emergency" situation, and therefore the decisions made as to the management of a wildland fire go through a rapid emergency assessment prior to the implementation of responses. The decision process land managers go through to determine the appropriate management response to unplanned wildland fires includes the development of wildland fire management strategies and associated decision criteria (EA, p. 11).

- 7-3. "What does this (statement) even mean: *Alternative 2 would replace fire management standards specific to each management area with Forest-wide standards as follows: Fire managers and line officers would have the ability to consider the full spectrum of fire management strategies and options for naturally-caused wildland fire that achieve a variety of resource objectives, when and where appropriate and desirable, along with actions to minimize negative effects to life, investments and valuable resources. When implementing any wildland fire management strategy, firefighter and public safety are the first priority.* EA, p. 23 "

GNF Response: As described in detail on pages 16, 19 and 20 of the proposed amendment EA, the Forest Service proposes replacing the fire management standard described under each individual management area as found in the 1987 Forest Plan as follows:

From the Forest Plan, Fire, p. II-28 - *The wildland fire suppression response identified in the management area standards (ie., control, contain, confine) will be employed .*

From the Forest Plan, fire standard for MAs 1, 2, 24, 25 and 26 (FP, p. III-3, 5, 68, 70 and 72) - *The wildfire suppression response will be control.*

From the Forest Plan, fire standard for MAs 5, 8, 9, 10, 11 and 13 (FP, p. III-16, 25, 28, 31, 35 and 42) - *The wildfire suppression response will be control, contain or confine. Contain and confine responses may be used before and after the fire season.*

From the Forest Plan, fire standard for MAs 3, 3a, 6, 7, 12, 14, 15, 16, 17, 18, 19 and 20 (FP, III-7, 9, 18, 38, 46, 49, 51, 53, 55, 58 and 60) - *The wildfire suppression response will be control, contain or confine.*

From the Forest Plan, fire standard for MAs 7 and 23 (FP, p. III-22 and 66) - *The wildfire suppression will depend on the surrounding or adjacent management area.*

From the Forest Plan, fire standard for MA 21 (FP, P. III-64) - *Select the wildfire suppression response to minimize disturbance of research natural areas, control, contain, or confine.*

By implementing the proposed amendment, these standards would be replaced with one overarching Forest Plan standard as described by the commenters and found in the EA (p. 16, 19, 20 and 23). Fire managers would have the opportunity to consider a variety of fire management strategies when determining how to manage an unplanned ignition (lightning-caused fire).

The Forest Plan, Fire Management Appendix E, provides definitions of control, contain and confine fire management strategies (FP, p. E-2). They are as follows:

Control fire - To complete the control line around a fire, any spot fires there from, and any interior islands to be saved; burn out only unburned area adjacent to the fire side of the control line; and cool down all hot spots that are immediate threats to the control line until the line can reasonably be expected to hold under foreseeable conditions.

Contain fire - To surround a fire, and any spot fires there from, with control line, as needed, which can reasonably be expected to check the fire's spread under prevailing and predicted conditions.

Confine fire - To restrict the fire within determined boundaries established either prior to the fire, during the fire or in an escaped fire situation analysis.

These types of strategies are still viable fire management options today. However, the proposed amendment would expand these options thus allowing fire managers the ability to consider a wider range of strategies for any wildland fire. By doing so, fire and other resource managers would have the flexibility to implement a response appropriate to an individual set of circumstances and conditions depending on where the fire ignition occurred. As described in the EA, with implementation of the proposed amendment (Alternative 2), fire managers could consider one or more of the following strategies for any one fire: full suppression with multiple strategies; control and extinguish; using the fire to achieve other resource or management area objectives; monitoring the fire from a distance; monitoring on-site; point protection or confinement; monitoring with limited contingency actions; monitoring with mitigation actions; or any combination of these (EA, p. 17).

- 7-4. "This amendment is non-specific. Specific forest plan standards were originally tailored to specific habitat types and forest conditions on the ground. The Gallatin NF is effectively replacing all

existing MA standards with another summary “objective.” This is not a non-discretionary standard.”

GNF Response: Refer to GNF response to Comments 6-3 and 7-3. The proposed fire management amendment is not replacing all MA standards as suggested by this comment. This amendment would only be changing the fire management standard described under each individual MA, from a predominately suppression-driven management response to unplanned wildland fire to a Forest-wide standard where a variety of fire management options could be employed appropriate to an individual set of circumstances and conditions (EA, p. 16, 19 and 23). The EA proposes to replace fire management direction in all management areas pertaining to the management of unplanned wildland fires only (i.e., lightning-caused fires).

- 7-5. “Alternative 2 effectively eliminates specific standards deemed necessary in 1987 to “gain a complete understanding of the management direction...” Gallatin Forest Plan (Plan), p. II-2. Replacing area-specific standards with one uniform (objective) statement disrupts and distorts the requisite “multiple-use prescriptions and associated standards and guidelines for each management area, including proposed and probable management practices... 36 CFR 219.11(c).”

GNF Response: Refer to GNF response to Comments 7-3 and 7-4.

- 7-6. This comment letter suggests that an EIS (environmental impact statement) is “required” for the following reasons: “This change is “significant,” which requires that “the Forest Supervisor shall follow the same procedure as that required for development and approval of a forest plan. 36 CFR 219.10(f)” and, “Forest Plan implementation isn’t what it was when the Plan was approved in 1987. The changes are significant. So significant, in fact, “...the changes significantly alter the long-term relationship between levels of multiple-use goods and services projected under planned budget proposals as compared to those projected under actual appropriations. 36 CFR 219.10(e).”

GNF Response: The National Forest Management Act (NFMA) has provisions that allow the amending of Forest Plans (EA, p. 11). The EA proposes to replace programmatic management direction on the entire Forest in all management areas pertaining to the management of unplanned wildland fires only (i.e., lightning-caused fires). Refer to GNF response to Comment 4-4 and 6-3.

As stated in the EA (p. 15), the alternatives being considered, Alternative 1 (the no action - current Forest Plan direction) and Alternative 2 (proposed amendment) would not change the desired future conditions, land allocations, resource management directions, or goods and services specific to other resource management areas as described in the 1987 Forest Plan. Therefore there is no change in accordance to 36 CFR 219.10(e). As stated in the EA, Chapter 1, the proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide the fire manager with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire.

- 7-7. “The proposed amendment fails to follow essential forest planning principles that prescribe, in NFMA Regulations, how management planning is to be conducted. See: 36 CFR 219.1.” The proposed amendment, in particular, fails to recognize the following examples of NFMA planning principles:

36 CFR 219(b)(3) – Recognition that the National Forests are ecosystems and their management for goods and services requires an awareness and consideration of the interrelationships among plants, animals, soil, water, air, and other environmental factors within such ecosystems:

36 CFR 219 (b)(10) – Use of a systematic, interdisciplinary approach to ensure coordination and integration of planning activities for multiple-use management;

36 CFR 219(b)(13) – Management of National Forest System lands in a manner that is sensitive to economic efficiency; and

36 CFR 219(b)(14) – Responsiveness to changing conditions of land and other resources and to changing social and economic demands of the American people.”

GNF Response: As stated in the EA, Chapter 1, the proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide the fire manager with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire. The Fire Amendment EA complies with 36 CFR 219.1:

(b)(3) - Resource effects analyses are provided in Chapter 3 of the Fire Management Amendment to the Gallatin National Forest Plan EA.

(b)(10) - The list of resource specialists that performed the various effects analyses are listed in Chapter 4 of the EA.

(b)(13) - Refer to GNF response to Comment 3-1.

(b)(14) - As stated throughout the EA and Response to Comments, the objective of this amendment effort is to respond to changing conditions in regards to management of unplanned wildland fire.

- 7-8. “There are new, climate-linked lines of evidence that exist in trends on lands administered by the Gallatin NF, USFS-USDA. Because of these multiple and consistent lines of compelling scientific evidence, climatic changes are already bringing new, unforeseen levels of uncertainty about sustained yield to forested acreage managed by the Forest Service. These changes should a) be acknowledged, and b) require the agency to declare that its current sustained yield estimates are subject to significant uncertainty and overestimation.”

GNF Response: Refer to GNF response to Comment 6-50.

- 7-9. “ As a direct result of climate change, the “analysis of the management situation” and the “range of reasonable alternatives” for planning analysis have changed significantly since 1987. 36 CFR 219.12(e). We respectfully request that the Forest Service immediately issue a public disclosure statement of uncertainty/overestimation, and begin to revise its Regional Guides and Long-range Management Plans (LRMPs), including the Gallatin NF Plan, accordingly. This revision should take the form of a programmatic Environmental Impact Statement (EIS), pursuant to the provisions of NEPA and NFMA.”

GNF Response: Refer to GNF response to Comments 6-10, items 39 and 40, 6-49 and 6-51.

- 7-10. “There are consistent lines of evidence that point to significant uncertainty about sustained yield from and renewability/restoration of forests. We believe that the referenced evidence is sufficient to demonstrate that current estimates of sustained yield “outputs” are jeopardized by recent global change. This, in turn, misleads the interested public and Congress, by underestimating the risks to the related jobs base and community stability in addition to the risks to forest ecosystems.”

GNF Response: This comment is not relevant to the changes being proposed in the fire management amendment and beyond the scope of this project. As stated in the EA, Chapter 1, the proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide the fire manager

with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire.

- 7-11. “ We also find that vegetative management practices, including timber harvests being contemplated or planned at this time are at potential risk of being one-time actions for which the public is generally unprepared.

GNF Response: The proposed fire management amendment does not include any proposed timber harvest activities, nor does it contemplate or plan any timber harvest activities into the future. Therefore this comment is beyond the scope of this proposal.

- 7-12. “The Plan provides no assurance of restocking within 5 years following vegetative treatments proposed in the EA. NFMA § 6 (g)(3)(E), and 36 CFR 219.27 (c)(3).”

GNF Response: The proposed fire management amendment does not include any proposed vegetation management activities that would apply to the NFMA 5-year stocking requirement. Therefore this comment is irrelevant and beyond the scope of this proposal.

- 7-13. “...(the) FS must consider the cumulative effects of activities on land of all ownerships in or adjacent to National Forest System Lands. Wildfire knows no boundaries. This amendment seems to have no boundaries for hands-on management so long as it can be justified as a fire-related action, or in some way intended to enhance firefighter safety.”

GNF Response: Refer to GNF response to Comments 6-8, 6-40, 6-41 and 6-55. This amendment would only be changing the fire management standard described under each individual MA, from a predominately suppression-driven management response to unplanned wildland fire to a Forest-wide standard where a variety of fire management options could be employed appropriately to an individual set of circumstances and conditions (EA, p. 16, 19 and 23). The EA proposes to replace fire management direction in all management areas pertaining to the management of unplanned wildland fires only (i.e., lightning-caused fires). The proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide the fire manager with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire.

- 7-14. “NEPA requires that the analysis reveal:

- (i) the environmental impact of the proposed action,
- (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented,
- (v) any irreversible and **irretrievable commitments** of resources which would be involved in the proposed action should it be implemented.”

GNF Response: Refer to GNF response to Comment 6-43.

- 7-15. “Prescribed burning and mechanical vegetation manipulation measures have associated detrimental side effects such as soil compaction, soil erosion and destabilization, vegetation disruption, and disruption of wildlife habitat. However, the impacts of prescribed fire should be carefully evaluated. We are particularly concerned with the impacts of prescribed fire on the ecological integrity of designated wilderness, and inventoried or uninventoried roadless areas.”

GNF Response: There are no specific prescribed burning or mechanical vegetation treatments being proposed in this EA. Refer to GNF response to Comment 6-52.

- 7-16. “NEPA also requires the Forest Service to take a “hard look” at the cumulative effects this proposed “wide spectrum of fire management strategies” have on biological corridors. We are especially concerned about the high probability that vegetative treatments adversely affect old

growth, ridge tops and riparian areas adjacent to rivers, streams, wetlands, bogs, seeps, wet meadows, and all other water features in the landscape.”

GNF Response: NEPA does not require cumulative effects on biological corridors. As stated repeatedly throughout the EA, resource analyses and the Response to Comments, there are no vegetation treatments being proposed in this amendment effort.

7-17. “ We request an analysis of the current status (“management situation”) of wildlife corridors for all MIS and T&E species.”

GNF Response: Analyses on management indicator species (MIS) and threatened and endangered species listed for the Gallatin National Forest are provided in detail in the EA, Chapter 3, Sections 3.3.1 and 3.3.2, as well as the Biological Assessment for the Fire Management Amendment (project file).

7-18. “Threatened, endangered, FS-listed sensitive species, and other species that may be adversely affected by the mechanical “treatments,” including temporary roads, burning, thinning and logging. We request a full accounting of how the amendment may significantly influence recovery efforts (populations and habitat) of species listed as threatened, endangered, and other species that may become listed as a result of implementing this amendment. The impacts to core habitat and connectivity between core habitat for threatened and endangered species should be thoroughly analyzed.”

GNF Response: There are no mechanical treatments, temporary roads, prescribed burning, thinning or logging being proposed in this amendment effort.

7-19. “The lynx conservation assessment and strategy includes direction for mapping lynx habitat, including habitat connectivity, and limiting risks to lynx populations. The environmental analysis must state whether the project is within or adjacent to any LAUs. Is this project in lynx critical habitat? The Lynx BO explicitly states that even if a project area is located outside of a LAU, the lynx conservation strategy and agreement requires that habitat connectivity between lynx analysis units be maintained. Thus, the EA must analyze project effects on lynx connectivity in order to comply with the LCAS. Even if the lynx do not use the analysis area extensively, the project area may provide habitat that is critical to population viability of lynx.”

GNF Response: As stated in the EA (p. 11), the proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide the fire manager, district rangers and their resource specialists, a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire. As part of the determination of effects, Canada lynx and critical lynx habitat were analyzed (EA, p. 76-84). The EA, as well as the Biological Assessment for this amendment effort, identified and disclosed information on all Gallatin LAUs. Fire could affect critical habitat for lynx, which is only found in the Gallatin and Absaroka Beartooth Mountain ranges, and was considered in the analysis and in consultation with the US Fish and Wildlife Service (EA, p. 84; Fire Amendment Biological Assessment 2011; USFWS Concurrence Letter 2011). Wildland fire is considered an emergency situation, and depending on its location, size and other values at risk, initiates an emergency consultation between the Forest Service and USFWS as soon as possible (EA, p. 72). Emergency consultation with USFWS has been a routine practice since 2000.

7-20. “The Forest Service has not met the “inventory and quantitative data” requirements “making possible the evaluation of diversity in terms of its prior and present conditions.” 36 CFR 219.26. The proposed new forest-wide “standard” makes it nearly impossible to estimate “how diversity will be affected by various mixes of resource outputs and uses, including proposed management practices. *See generally:* 36 CFR 219.27. Please, disclose how you plan to do this.”

GNF Response: As stated in the EA, Chapter 1, the proposed amendment is a programmatic action that is not directly related to a specific project or ground-disturbing action. The intent of the proposed amendment is to provide the fire manager with a broader choice of management strategies when determining the appropriate course of action in managing an unplanned (lightning-caused) wildland fire.

- 7-21. "Habitat fragmentation is another "management situation" piece in need of attention and updated analysis. We are concerned that fragmentation has been generally overlooked. Plan implementation proceeds, project-by-project, never taking a hard look at the "quantity," or total acres as a percentage of the entire forest, and "quality," or block size, of native interior forest. Is it functioning well enough to maintain viability for associated species that existed in greater abundance historically?"

GNF Response: This comment is beyond the scope and intent of the proposed fire management amendment, which focuses on fire management options for unplanned wildland fire events, such as lightning fires.

Additional References:

Gallatin National Forest Resource Advisor's Field Guide for Wildland Fire, annual updates 2011.

Reinhardt, E. and L. Holsinger. 2010. Effects of fuel treatments on carbon-disturbance relationships in forests of the northern Rocky Mountains. *Forest Ecol. Manage.* (2010), DOI: 10.1016/j.foreco.2010.01.015.

USDA - Forest Service. 2011. Biological Assessment to the Fire Management Amendment to the Gallatin National Forest Plan.

USDI - Fish and Wildlife Service. 2011. USFWS Informal Concurrence Letter to the Biological Assessment to the Fire Management Amendment to the Gallatin National Forest Plan.

Westerling, A. L., M.G. Turner, E.A.H. Smithwick, W.H. Romme and M.G. Ryan. 2011. Continued warming could transform Greater Yellowstone fire regimes by mid-21st century. 6 p. On line: www.phas.org/cgi/doi/10.1073/pnas.1110199108