Brebner Flat Project –Scoping Comment Synopsis

Comments Log – Scoping Comments Received Based on March 15-April 15, 2019 Comment Period

Cmt #	Name	Affiliation (if any)	City	ST
01	Partin, Tom	American Forest Resources Council	Lake Oswego	OR
02	Bramblett, Deann	Benewah County Commissioners	St Maries	ID
03	Cook, J.	Idaho Department of Parks and Recreation	Coeur d' Alene	ID
04	Peck, Willy	Idaho Forest Group	Coeur d'Alene	ID
05	Bilodeau, Katie	Friends of the Clearwater, et. Al.,	Moscow	ID
06	Corsi, Chip	Idaho Department of Fish and Game	Coeur d'Alene	ID
07	Johnson and Carver	Former Benewah County Natural Resources team members	St Maries	ID

Comment Synopsis

NEPA (1919.15, Chapter 25.1) requires that we review, analyze, evaluate and respond to substantive comments. The following table identifies substantive comments received during Brebner Flat scoping, what action needs taken (if any), and the team member with primary responsibility for the action(s) needed.

Comments may be paraphrased; before responding to specific comments, each comment letter should be reviewed in its entirety to ensure there is no loss of context. All letters are posted to the Brebner Flat SharePoint site.

ID#:	Name/Affiliation	Position:		
01	American Forest Resources Council	American Forest Resources Countil indicates support of the proposal.		
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**		**Responsibility:**
01-01	**Treatment area:** … Suggests the project should treat 3,000 acres rather than 1,719 acres.	The decision maker takes many factors into consideration, including financial and economic measures. This was determined by the Interdisciplinary Team to be the appropriate size for the project, and the proposed action will move the Forest toward the social and economic goals and desired conditions outlined in the 2015 Forest Plan. Not tracked further		Czescynski
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**		**Responsibility:**
01-02	**Treatment area:** By limiting treatment to 1,719 acres, the IPNF has not met social and economic goals and desired conditions of 2015 IPNF Forest Plan (GOAL-SES-01, FW-DC-SES-01, FW-DC-SES-02, FW-DC-SES-03).	A financial efficiency analysis showed that the proposed activities would result in a viable timber sale that would provide about 23 MMBF (43,246 CCF) with a present net value of $2.0 million. The project would also contribute an estimated 67 jobs per year during the life of the project (EA p.20). The effect to employment may not necessarily be the creation of new jobs but contribution to supporting/sustaining existing jobs and income (EA p. 21).		Czescynski
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**		**Responsibility:**
01-03	**Treatment area:** Limiting treatment to 1,719 acres the project fails to accomplish the following: FW-DC-VEG-01 and FW-OBJ-01.	The proposed combination of regeneration harvests, prescribed fire, and reforestation would increase the area dominated by desirable long-lived, seral species within treated stands and collectively across the project area (EA p. 15). Across the project area, western white pine and western larch dominance types would increase by 1,719 acres. There would be a corresponding decrease in grand fir, Douglas-fir, western hemlock and lodgepole pine cover types (EA p. 16).		Czescynski
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**		**Responsibility:**
01-04	**Treatment area:** Not using CE 3,000 acre limit. Reduced acres from 1,948 to 1,719	The decision maker takes many factors into consideration, including financial and economic measures. This was determined by the Interdisciplinary Team to be the appropriate size for the project, and the proposed action will move the forest towards the social and economic goals desired conditions outlined in the 2015 Forest Plan..		Sorenson
ID#:	**Name/Affiliation**	**Position:**		
03	IDPR	Idaho Department of Parks & Recreation does not support or oppose this proposal.		
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**		**Responsibility:**
03-01	**Groomed snomobile trails:** We reviewed the recreation report and the proposed design feature in Appendix C in the EA. It appears that this project could impact groomed snowmobile trail opportunities on the St. Joe. The Design Features do not contain any provisions to protect these groomed trail opportunities. We request that no road plowing be allowed for this project between December 15th and March 15th. This would help protect the 8 miles of groomed trail opportunities and help provide access to the Round Top Snow Hut.	Design features identified in the recreation report will be integrated into Appendix C of the EA. The following design feature reflects the current Agreement between the Forest Service, Shoshone County Groomer Board and Idaho Department of Parks and recreation, in the context of winter plowing for commercial forest activities. "Plowing of groomed routes should only occur before December 15 or after March 15 to allow for grooming of motorized snow routes. Should plowing be necessary between December 15 and March 15 an area should be plowed to provide for parking at the end of the plowed route."		Plourde

ID#:	Name/Affiliation	Position:	
05	Friends of the Clearwater	Friends of the Clearwater et. Al. does not support the project	
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-01	**Missing Report:** Public cannot view fishery report on line.	The report was added to the website.	Reinhart
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-02	**Gradient of stream:** No Analysis of gradient of stream.	Hydrology Specialist Report Table 2, "Listing of subwatersheds located within the Brebner Project area", lists average stream slopes. Project file document F_04 Culverts10202014, describes potential for fish presence above culverts based stream gradient and presence of water, Project file document F_08_BrebnerFieldReview110217 describes streams and potential units in the Roundhouse Gulch drainage, Project File document F_09_KelleyCr_FieldReview20180529 describes streams in the Kelley Creek drainage, Project file document F_24_Review of upper extent of streams in Brebner Flats units, describes gradient of streams associated to selected units.	Sauter
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-03	**Watershed:** "However, the watershed report suggests that under bankfull events, "suspended (fine) sediment could be expected to impact water quality in the St. Joe immediately downstream from the confluence of the project area streams? Hydrology report at 5. There is a contradiction in the potential impacts to fish-bearing streams, including impacts to bull trout and westslope cutthroat trout"	The fisheries section of the EA pg 38 states that "The proposed project may effect but is not likely to adversely affect a federally listed bull trout population due to the potential for sediment generated in Kelley and Williams to reach the St. Joe River. The proposed project may impact westslope cutthroat trout individuals or habitat present in Kelley Creek, but will not likely contribute to a trend toward federal listing." In other words if the potential for expected impact to water quality is realized than effects to the fish population and habitat could also be expected.	Hawdon
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-04	**Impacts to fish species:** Contradiction in the potential impacts to St. Joe River, including impacts to bull trout and westslope cutthroat trout	The above discussion also responses to this comment because it addresses effects in the St. Joe River.	Hawdon
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-05 (HYD 5-1)	**ECA:** …"When a drainage on NFS lands approaches a 20 percent ECA, there is an increased risk for adverse effects…"	In addition, the Hydrology Report states (pg. 11): As stated by Olsen et al, If the largest bed particles (D84 or larger) are stable, then the stream channel itself is likely to be stable, despite movement of finer material. When conditions arise in which stream competence is sufficient at bankfull events to initiate movement of the D84, the stream is considered to be unstable and at a "threshold of concern". Based on this cited literature and Pfankuch stream surveys, only Blue Grouse Creek was determined to be at risk, due to movement of D84 substrate, from possible increased frequency of bankfull events due to ECAs above the 20 percent threshold. As such, units 24, 25, 26, and 26B from the Blue Grouse Drainage were removed from the Proposed Action resulting in the ECA for the Siwash Creek drainage, which includes Blue Grouse, dropping below the 20 percent threshold eliminating this concern.	Sauter

Formatted Table

Cmt#:	Concern/Comment:	Initial Response/Further Action:	Responsibility:
05-06 (HYD 5-2)	**ECA:** ECA modeled data analysis comments	In addition, the Hydrology Report states (pg. 11): As stated by Olsen et al, If the largest bed particles (D84 or larger) are stable, then the stream channel itself is likely to be stable, despite movement of finer material. When conditions arise in which stream competence is sufficient at bankfull events to initiate movement of the D84, the stream is considered to be unstable and at a "threshold of concern". Based on Pfankuch stream surveys, only Blue Grouse Creek was determined to be at risk from a possible increase of bankfull events from ECAs above the 20 percent threshold. As such, units 24, 25, 26, and 26B from the Blue Grouse Drainage were removed from the Proposed Action resulting in the ECA for the Siwash Creek drainage, which includes Blue Grouse, dropping below the 20 percent threshold eliminating this concern. The provided analysis is a worst case scenario based on "all" road construction and timber harvest occurring in year-one of the Proposed Action. In reality, road construction activities would precede timber harvest activities, timber harvest activities would occur in multiple years with subsequent hydrologic recovery. Hydrology Report: Revision – incorporation of inadvertently omitted text(pg. 5): With the implementation of the Proposed Action, the total cumulative effect ECA acreage is 4,049 acres which is 12.8 percent of the St. Joe – Siwash (HUC12 – 170103040308), a 6.1 percent increase over the existing baseline conditions. Based on ECA modeling, no detectable increases, beyond historic variability, in peakflows would be expected from the St. Joe – Siwash watershed. Added clarification (pg. 5): …these impacts would be minimal since the combined bankfull discharges for Kelley Creek, Siwash Creek, Williams Creek, and Theriault Creek is 149cfs compared to 7070cfs for the St. Joe River at the confluence with Kelley Creek. This is a 1:47 dispersion ratio or, 2.1% of the bankfull discharge for the St. Joe River at the Kelley Creek confluence. Added clarification (pg. 18): To date, the USGS Watershed Boundary Dataset is complete for the United States to the 12-digit hydrologic unit. The 14 and 16-digit hydrologic units are optional and are not complete for the nation. To evaluate possible impacts to specific streams located within the St. Joe – Siwash HUC12 watershed, select drainages were delineated using USGS StreamStats (refer to table 2 and 12). Added Analysis (pg. 18): For Kelley Creek, based on field surveys, the streambed and streambanks of Kelley creek are considered stable with infrequent observation of bank erosion, streambed scour, and pool sediment deposition… … To evaluate the likelihood of bankfull events during the key periods of bull trout migration, the baseline discharge was adjusted by the modeled ECA increases (see figure 1). Based on this analysis, discharge from Kelley Creek could potentially exceed bankfull with a 20 percentile flow event during the month of May but not in June or September. … To evaluate the likelihood of bankfull events during the key periods of bull trout migration, the baseline discharge was adjusted by the modeled ECA increases (see figure 2). Based on this analysis, discharge from Williams Creek and Theriault Creek would be expected to remain below the bankfull levels in May, June, and September during the bull trout migration periods in the St. Joe River.	Sauter
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-07 (HYD 5-3)	**Missing Information:** Pages 22 to 25, have no discussion of any benefits.	Not part of the Purpose and Need for the Brebner Flat project	Sauter

Cmt#:	Concern/Comment:	Initial Response/Further Action:	Responsibility:
05-08 (HYD 5-4)	**Analysis tool:** …wrong tool for modeling impacts to 5 separate watersheds…	The WEPP model was incorporated with the ECA model, and Watershed Condition methodology to analyze impacts based on the Watershed Disturbance Ranking from the FP, Appendix D. These tools were determined to capture all possible activities with the potential to impact hydrologic resources within the Brebner Flat Project Area.	Sauter
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-09 (HYD 5-5)	**Report:** Presumably, the integrated report covers 303(d) streams…	Added clarification to EA and Hydrology Report (pg. 13) to correct inadvertent omission during edit: *Based on the 2014 final and 2016 Integrated Report draft recommendations, no stream within the Brebner Flat boundary is 303(d) listed by the EPA or rated as "not supporting" beneficial use in the 305(b) integrated report.* Added clarification to EA and Hydrology Report (Summary): *No stream directly or, indirectly influenced by the Brebner Flat project area is 303(d) listed by the EPA.*	Sauter
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-10 (letter 5-1)	**Fisher:** Comment on exclusion of fisher in detailed analysis and the "strange" discussion on old growth and fisher's lack of dependence on it.	The only mention of old-growth in the fisher discussion was that recent research suggests that fisher are not old-growth dependent but depend on a mosaic of forest types and seral stages. In addition, it has been noted that openings and a lack canopy cover is more of a limiting factor for fisher. There is no mention of old-growth other than the single mention of it in the 2nd paragraph which stated their lack of dependence on it.	Bellis
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-11 (letter 5-2)	**Harlequin Duck:** The commenter claims that because there is a photo of a harlequin duck juvenile on the St. Joe River in a display across the river from the project area that there are harlequin ducks in the project area.	Yes, from surveys we have conducted, there are Harlequin ducks on the St. Joe River but in the Upper St. Joe, dozens of miles upstream from the project area where their preferred habitat is.	Bellis
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-12 (letter 5-3)	**Elk Security:** Concerns over the security of gates in elk security areas.	Yes, breaching of gates is always a concern to the agency. The Forest is doing all it can in making sure gates are as secure as possible and make every effort to make them "unbreachable" by beefing up designs but the public can be quite resilient in their endeavors to get behind them. We have even trained more Forest Protection Officers within our ranks to help enforcement. We are doing everything within our capacity and limited $ gates remain secure, with special emphasis on those in elk security areas.	Bellis
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-13	**Black-backed woodpecker (BBW):** Concerns that the project will have major impacts on BBW habitat	We do acknowledge that the table on page 11 misstates the fact that areas of extensive insect infestation will not be treated when they in fact will be treated. The treatment of these areas is acknowledged and discussed extensively in the wildlife report (pp C-8 and C9). For sensitive species like BBW, we always analyze the overall range of a species to determine if a specific project will trend a species towards listing. The treatment of beetle infested trees may reduce the amount of suitable habitat in the Brebner project area but across BBW range there is constantly more habitat being created, through fire and beetle kill, than being removed through harvest, therefore the species is trending further away from listing rather than towards listing. This trend will only increase with the onset of climate change and increases in fire in the west.	Bellis

Cmt#:	Concern/Comment:	Initial Response/Further Action:	Responsibility:
05-14	**Soil nutrients:** "Forest growth and regeneration is vigorous after high-intensity fire...[where] post-fire conifer regeneration does not quickly occur, these areas provide important montane chaparral habitat, which has declined due to fire suppression." Hanson (2010) pp. 13. Fire puts nutrients in the soil that logging cannot.	From a soils perspective, this statement is inaccurate in some contexts. This bullet point specifically refers to high intensity wildfire, and proceeds to claim that "fire puts nutrients in the soil that logging cannot". This is not necessarily true as high severity wildfires can reach a temperature that volatilizes plant essential nutrients located in soil organic matter. This volatization removes these nutrients from the soil ecosystem, and makes them no longer available to plants. This matter is discussed in detail under the Prescribed Burning section of the Proposed Action analysis within the Brebner Soils Specialist Report (page 8).	Neils
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-15	**Wild and Scenic River:** It is a designated as a Wild and Scenic River. There is no analysis in the EA of the impacts on this river even though sediment is expected to enter the river, at least according to the Hydrology Report, form the proposed timber sale. How would this sale affect the outstandingly remarkable values of the St. Joe River? This is not addressed even it must be considered since a portion of the river corridor is within the project area.	The Wild & Scenic Rivers Act is addressed in Appendix B of the Recreation Report in the project file. No project activities are planned within the WSR boundary. Water resource activities are evaluated to determine (WSR Act, section 7(a)) if there will be an unreasonable diminishment of scenic, recreation, fisheries or wildlife qualities. No unreasonable diminishment was found.	Plourde
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility**
05-16 (p. 1)	**Report:** Public cannot view fuels report online.	The report has been added to the website.	Reinhart
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility:**
05-17 (p. 4)	**Fire Behavior:** It is weather and climate that primarily drives fire behavior, not hazardous fuels. If weather and climate drive fire, logging is not going to mitigate this primary driver. Schoennagel et al. (2017); Whitlock, C. et al. (2015).	The three factors affecting wildfire behavior are fuels, weather, and topography. Of these three, fuels (amount and arrangement) can be modified, resulting in a change in fire behavior. The fuels report analyzes the changes that can be expected over time for the alternatives in the Brebner Flat project, using the indicators of flame length, probability of torching, and crowning index. The Schoennagel paper, entitled "Adapt to more wildfire in western North American forests as climate changes", advocates policies that promote adaptive resilience to wildfire. A key point is that fuels reduction alone cannot alter wildfire trends. More managed fire is needed on the landscape. Additionally, targeting fuels in certain ecosystems, as well as communities themselves, to be adapted to more frequent fire is recommended. Midelevation mixed conifer forests, such as those in the Brebner Flat area, are mentioned on p.6 of the Schoennagel paper as being one of the forest types that could benefit from fuels treatments that reduce the likelihood of large patches of high-severity fire and facilitate the migration of species adapted to drier, warmer conditions. A top-down influence of climate on fire behavior is presented in the Whitlock reference. This does not eliminate the role of fuels and topography in fire behavior. We also agree and anticipate that climate change will be a concern with future vegetation communities in the projet area; that is why we are striving to increase forest resilience to climate change by increasing the diversity of forest tree species and forest structures in the project area.	Griffith

Cmt#:	Concern/Comment:	Initial Response/Further Action:	Responsibility
05-18 (p. 4)	**Project focus:** Vegetation management will not accomplish the stated focus of the project to lessen the severity of wildfires. Recent science has debunked the myth that no management corresponds to higher fire severity. *Bradley et al. (2016)*	See 05-27	Griffith
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility**
05-19 (p. 5)	**Report:** There are benefits that wildfires provide, even those patches that are "high severity". Hanson (2010) The no-action alternative could have positive impacts.	IPNF Land Management Plan direction for fire management in the Brebner Flat project area is to reduce the threat of wildland fire. This is due to the values that exist in the wildland-urban interface, as well as in the private and federal lands suitable for timber production. There are approximately 941,000 acres of the IPNF where the primary fire management option has been identified as using natural, unplanned ignitions, as well as planned ignitions to meet resource objectives. Allowing fire to play it's natural role in the ecosystem is recognized as vital to the adaptive resilience approach to managing the forests in response to changing fire regimes. However, severe wildfire is not desirable in every area of the IPNF.	Griffith
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility**
05-20 (VEG 5-1)	**Old Growth:** Describe how the project maximizes retention of old growth and large trees that are resilient to insects and trees.	No timber harvest would occur in old growth stands in addition to retaining mature forests that have the potential to become old growth in the future (EA p.7-8). Desirable structural elements (particularly existing large trees) would be maintained. Desirable individual leave trees are healthy western white pine, western larch and ponderosa pine (EA p. 13).	Czescynski
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility**
05-21 (VEG 5-2)	**Regeneration harvests:** The past management practices that the FS asserts contributes to the current condition surrounding the area it wants to log appears to be because of regeneration harvests in the area. Given regeneration harvests have partially created the current condition, proposing more regeneration harvest to improve current condition is, minimally, highly uncertain. This needs to be explained.	The silviculture report does state "Suppression of fire and other current management practices, e.g., logging using a regeneration harvest prescription, have created a fragmented forest landscape." The silviculture report also states that "The size of these regeneration harvest units (2-40 acres) is much smaller than patches created by historic, natural fire regimes." The current Forest Plan guides land managers to utilize patch sizes of 100-300 acres with larger ones on steep slope in the Warm/Moist biophysical setting (FP p. 18). Larger patch sizes would decrease fragmentation.	Czescynski
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility**
05-22 (VEG 5-4)	**Opening sizes:** The opening sizes well exceed regional standards.	The National Forest Management Act (NFMA) limits the maximum opening to 40 acres for forest types found in the IPNF. However, Forest Plan components may allow for size limits exceeding 40 acres on an individual timber sale basis after 60 days public notice and review by the regional forester (36 CFR 219.11(d)(4)).	Czescynski

Cmt#:	Concern/Comment:	Initial Response/Further Action:	Responsibility
05-23 (VEG 5-5)	**Forest Health:** We do not agree that the new stands will be more resistant and be able to respond after disturbance. Stands comprised of ponderosa pine, white pine and larch that the Forest Service asserts would be more resilient in this setting seems to have very little scientific rigor.	Native insects and pathogens occurred in moist forests but recent activity levels far exceed those of the past. Within the Abies grandis Potential Vegetation Type (PVT) fire maintained landscapes that contained a plurality of early-seral Pinus ponderosa and Larix occidentalis. Insects were generally endemic but they are often epidemic in the current forests dominated by Abies grandis and Pseudotsuga menziesii. Similarily, the diseases Armillaria spp. and Phellinus weirii were historically endemic, but the current fir-dominated forests make epidemics of these diseases more common. Changing species composition from late-seral to early- and mid-seral species has been suggested as the key to restoring both moist and dry forests, by doing this resilience to epidemics from insects and diseases will increase (Jain and Graham 2007). For the IPNF, the desired forest composition represents an approximation of the historic range of conditions for forest composition. In comparison of the current and desired conditions, the species to increase are drought-and fire-tolerant and are relatively resistant to insects and disease (western white pine, ponderosa pine, and western larch). The species to decrease are relatively drought-and fire tolerant, and are fairly susceptible to various insects and diseases (grand fir/hemlock/cedar mix, Douglas-fir, lodgepole pine, and subalpine fir). Changing the forest composition towards the desired ranges will increase resistance and resiliency, reducing effects from drought, fire, insects, disease, and climate change (McKenzie et al. 2009) (IPNF FEIS 2013).	Czescynski
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility**
05-24 (VEG 5-6)	**Snags:** Science suggests that there are far too few snags to maintain ecologically healthy forests. Wildfire, insects, and disease will create the dead trees, so allowing these disturbance events, whether they happen in a short, intense time frame or a longer time frame, to continue is going to be the best route for ecologically healthy forests.	Currently, snag numbers on the IPNF decrease substantially in the larger size classes across all Habitat Type Groups and Dominance Groups (IPNF FEIS 2013 p. 83). The IPNF has set forest wide guidelines regarding snags FW-GDL-VEG-04. Guidance regarding snags is that vegetation management activities should retain snags greater than 20 inches DBH and at least the minimum number of recommended number of snags and live trees (for future snags). Where snag numbers do not exist to meet the recommended ranges, the difference would be made up with live replacement trees. Exceptions occur for issues such as human safety and instances where the minimum numbers are not present prior to the management activities (IPNF FP 2015 p. 20).	Czescynski
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility**
05-25 (VEG 5-7)	**Forest Insects:** Hart et al 2015 found that mountain pine beetles and fire activity have each independently increased due to warmer temperatures, but mountain pine beetles have not caused the increase in fire activity. In sum, the better available science shows that mountain pine beetle outbreaks are not causing a "hazardous fuels" buildup and "hazardous fuels" do not cause increased fire severity, so the best available science shows that this project will neither reduce hazardous fuels nor lessen the severity of wildfires, and may actually have the opposite effect.	The Hart et al. (2015) publication discusses the effects of mountain pine beetle (MPB) outbreaks on the amount of area burned in wildfires. The report uses the phrases "wildfire activity" and "area burned" interchangeably. As stated in Hart et al. (2015), "Our analysis included a single parameter: fire extent (area burned). It did not examine MPB effects on other fire behavior parameters, such as fire severity." Hart et al. (2015) also acknowledges that "Tree mortality caused by outbreaks of forest insects can dramatically alter ecosystems, leading to changes in timber resources; carbon sequestration; habitat quality; hydrology; and the likelihood or severity of subsequent disturbance, including wildfire." Also, neither the Brebner Flat EA nor vegetation report made the claim that MPB outbreaks alone are causing hazardous fuels buildup. The Brebner Flat vegetation report associates increased levels of hazardous fuels due to both root diseases (e.g. *Armillaria, annosus*, and laminated root disease) and bark beetles (fir engraver, Douglas-fir beetle, and mountain pine beetle) (VR p.9).	Czescynski

Cmt#:	Concern/Comment:	Initial Response/Further Action:	Responsibility
05-26	**Wild and Scenic River:** It is a designated as a Wild and Scenic River. There is no analysis in the EA of the impacts on this river even though sediment is expected to enter the river, at least according to the Hydrology Report, form the proposed timber sale. How would this sale affect the outstandingly remarkable values of the St. Joe River? This is not addressed even it must be considered since a portion of the river corridor is within the project area.	The Wild & Scenic Rivers Act is addressed in Appendix B of the Recreation Report in the project file. No project activities are planned within the WSR boundary. Water resource activities are evaluated to determine (WSR Act, section 7(a)) if there will be an unreasonable diminishment of scenic, recreation, fisheries or wildlife qualities. No unreasonable diminishment was found.	Plourde
Cmt#:	**Concern/Comment:**	**Initial Response/Further Action:**	**Responsibility**
05-27 (VEG 5-8)	**Fire Severity:** Science has debunked the myth that no management corresponds to higher fire severity. Bradley et al (2016). According to Bradley et al., not only did areas that did not have vegetation management –such as roadless areas or areas of older growth- did not show an increase in fire severity, but the researchers found the opposite to be true: "[B]urn severity tended to be higher in areas with lower levels of protection status (more intense management), after accounting for topographic and climatic conditions in all three model runs.	Bradley et al. (2016) utilizes the Protected Areas Database of U.S. States and Territories (PAD-US) of the United States Geological Survey (USGS) Gap Analysis Project (GAP). GAP uses information related to federal, tribal, state, local and private entities. There are four levels (1-4) of protection assigned by GAP. The highest protection, levels 1 and 2, generally apply to lands where active management is minimal (wilderness areas, national parks, national monuments) and levels 3 and 4 apply to lands managed for multiple-use and are subject to logging. According to the USGS PAD-US 1.4 National Protection Summary Statistics (USGS 2017), there are approximately 946 million acres included within the database. Approximately 70% (653 million acres) of these acres are assigned protection level 3 and 4 while around 30% are assigned protection level 1 and 2. Bradley et al. (2016) did define their study area (observation points in pine and mixed conifer forests at low/mid elevations), associated land area (29.2 million hectares or approximately 72 million acres), and the time frame from which data utilized was taken from (1984-2014). However, the authors did not display/disclose the allocation of the pine/mixed conifer forests associated observation points into their corresponding protection levels. Therefore, results could be biased if the majority of observation points occurred within protection levels 3 and 4. It would make sense that, utilizing coarse scale data (national level), burn severity would be greater in areas with protection level 3 and 4 since 70% of the acres (653 million) within the PAD-US make up these two categories.	Griffith