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**TAYLOR SOUTH  
TIMBER SALE  
PROJECT**

**FINAL ENVIRONMENTAL  
IMPACT STATEMENT**

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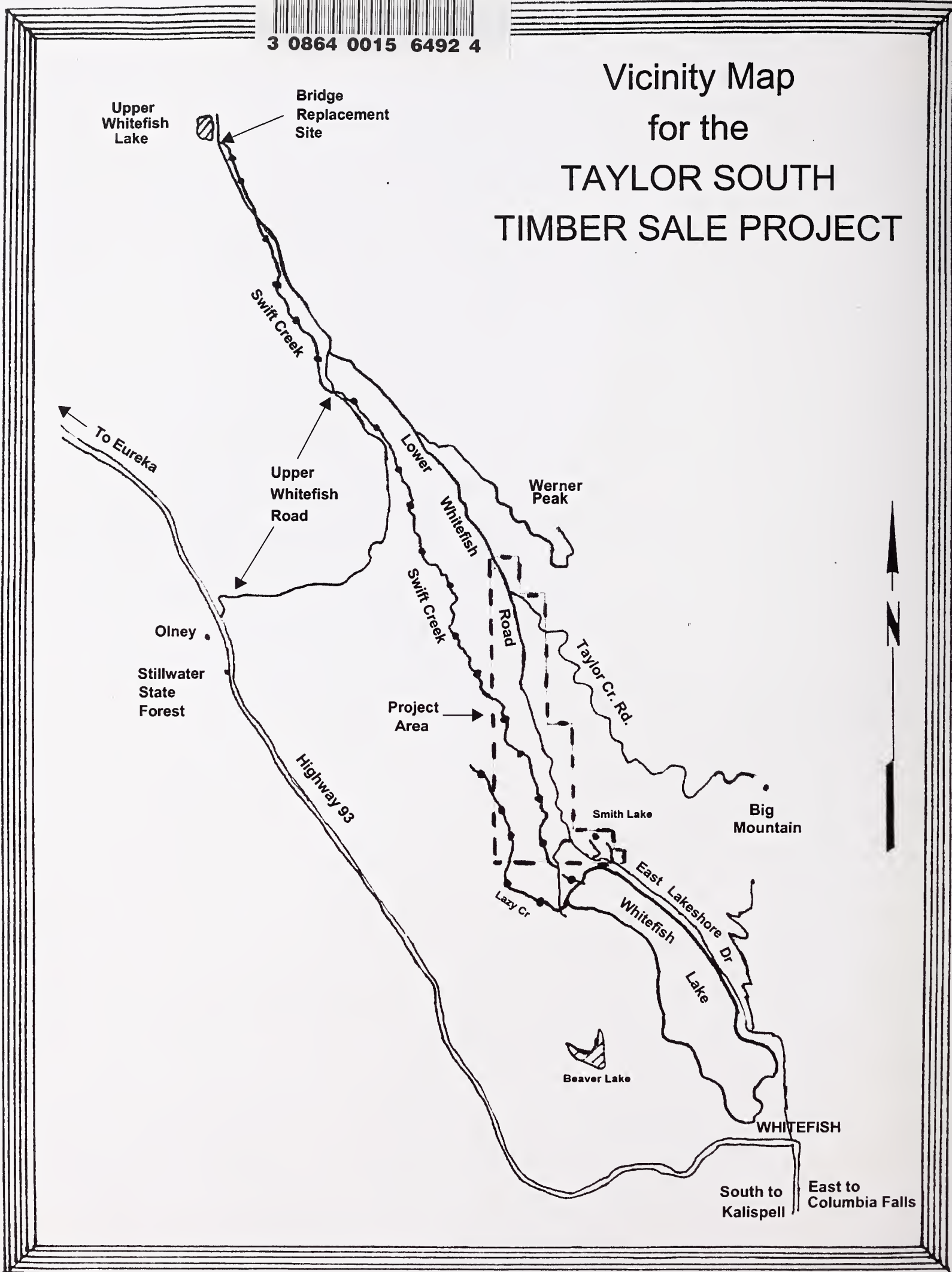
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Department of Natural Resources and Conservation  
Stillwater State Forest

# Vicinity Map for the TAYLOR SOUTH TIMBER SALE PROJECT



# DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION



JUDY MARTZ, GOVERNOR

## STATE OF MONTANA

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March 21, 2001

### TAYLOR SOUTH TIMBER SALE PROJECT FINAL ENVIRONMENTAL IMPACT STATEMENT

The Department of Natural Resources and Conservation (DNRC) has adopted the Taylor South Timber Sale Project Draft Environmental Impact Statement (DEIS), as the Final Environmental Impact Statement (FEIS), in combination with a new Executive Summary; additions and errata to the DEIS; the proposed decision; and the text of comments received on the DEIS and DNRC's responses to the comments. Enclosed is a copy of the FEIS containing the additions and errata, the proposed decision, and comments and responses. The FEIS document, in combination with the Draft Environmental Impact Statement, constitutes the entire FEIS.

The proposed project is located in Stillwater State Forest, just north of Whitefish Lake.

The proposed decision is a modification of Action Alternative B, which represents a compromise between the two action alternatives that were analyzed in the DEIS.

The FEIS is written in a different format than previous Stillwater State Forest FEIS publications. The Executive Summary incorporates pictures to convey information and is written so that all interest levels can understand the contents. The DEIS consolidated Chapters III and IV into one section that summarizes the analysis in plain English. The bulk of the scientific analysis is located in a tabbed appendix. I hope this format change improves our ability to communicate with all individuals interested in the management of State lands. I welcome your thoughts and comments.

I anticipate making my final decision on April 5, 2001.

Sincerely,

Handwritten signature of Robert L. Sandman in black ink.

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**TAYLOR SOUTH TIMBER SALE PROJECT**

**PREFACE**

This document presents changes made to the Taylor South Timber Sale Project DEIS. In accordance with the Administrative Rules of Montana (ARM) 36.2.530, DNRC has decided to adopt the DEIS as the FEIS, with all of the corrections, responses to comments, and additional information found in the Taylor South Timber Sale Project Errata. All issues raised by the public were either addressed in the DEIS, Comments and Responses, or the FEIS Errata; thus, DNRC felt that it was unnecessary to reproduce a full FEIS. This Errata, in combination with the DEIS, constitutes the Taylor South Timber Sale Project Final Environmental Impact Statement (FEIS).

This document consists of 3 sections:

- Additions and errata to the DEIS, including the location in the DEIS where the additions or corrections occur.
- DNRC's Proposed Decision
- The text of the comments received and DNRC's responses.







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**TAYLOR SOUTH TIMBER SALE PROJECT**

ADDITIONS AND ERRATA  
TO THE DEIS AND  
RESOURCE APPENDICES



TAYLOR SOUTH TIMBER SALE PROJECT  
ADDITIONS AND ERRATA  
TO THE DEIS AND  
RESOURCE APPENDICES

The following pages contain the additions and errata items that pertain to the DEIS and its Resource Appendices. The location in the DEIS or particular Appendix where additions or errata occur is underlined before each addition or erratum is presented. Except in the case where an entire page or section is added and/or changed, the additions are printed in **bold** and the errata are printed in *bold italics*.

#### CHAPTER I

Page I-1, second paragraph, last sentence, add: "... on Lower Whitefish Road and Taylor Creek Road would also be replaced."

Page I-2, second bullet under PROPOSED OBJECTIVES, add:

The existing bridge has been scheduled for replacement for several reasons.

- The existing bridge was installed in 1938 and has exceeded its life expectancy.
- The original bridge was not designed to meet today's highway legal load limits.
- Due to 60 years of depreciation and deterioration, the current load limit suggested by engineers is less than 3 tons.

Page I-2, under *EIS DEVELOPMENT*, first sentence, change: *impact to impacts*.

#### CHAPTER II

Page II-2, under ALTERNATIVE DESCRIPTIONS, *third sentence*, change: *timber sale contract or site preparation clauses to timber sale or site preparation contracts*.

Page II-4, under Road Work and Road Use, last paragraph, first sentence, add: *(Upper Whitefish and Lower Whitefish roads)* after Olney. Second sentence, delete: *32 and; and* change: *on East Smith Lake Dam Road to on the east Smith Lake Dam Road*.

#### CHAPTER III

Page III-3, under *Indirect Effects of Action Alternatives B and C*, last sentence, replace with: *A short-term increase in turbidity may result from removal of the existing bridge pilings; however, BMP implementation would result in minimal sediment introduction into the stream*.

Page III-4, under INTRODUCTION, third sentence, replace with: *When either species is present, spawning bed counts and spawning habitat data are collected by the Department of Fish, Wildlife and Parks (DFWP) to evaluate specific sediment conditions that may impact the quality of the spawning habitat*.

Page III-4, under EXISTING CONDITIONS, fourth sentence, replace with: *Currently, the annual water yield increase is below the predicted level that would likely*

result in sediment increases above natural conditions for all analyses areas.

Page III-5, under *Direct Effects of Actions Alternatives B and C*, last sentence, replace with: **No direct effects associated with the proposed bridge replacement were identified.**

Page III-5, under *Indirect Effects of Actions Alternatives B and C*, delete the last sentence and replace with: **Due to the removal of the existing bridge pilings, it is unlikely that a short-term increase in turbidity would affect fisheries downstream of the proposed bridge replacement since no spawning has been identified in this area.**

Page III-7, under *Direct Effects of Action Alternative B*, second sentence, insert: **and older** after 40-year-old; 100-year-old; and 100-year-old.

Page III-15, under *Direct Effects of Action Alternative B*, beginning of first sentence, insert phrase: **According to May 2000 formulas,** Between first and second sentence insert: **According to revaluations made in January 2001, the estimated project revenue into trust accounts is \$578,327; the FI deposits would remain the same.**

Page III-15, under *Direct Effects of Action Alternative C*, beginning of first sentence, insert: **According to May 2000 formulas,** Between first and second sentence, insert: **According to revaluations made in January 2001, the estimated project revenue into trust accounts is \$625,502; the FI deposits would remain the same.**

## REFERENCES

Green et al. 1992. Old Growth Forest Types of the Northern Region. R-1, Northern Region, Missoula, MT, USDA Forest Service. 60 p.

Montana Department of Natural Resources and Conservation. 1998. Biodiversity Implementation Guidance. 43 p.

## GLOSSARY

Page 4, under Old growth, the first line should read: Working definition from 1998 Biodiversity Guidance -

Page 4, under Project file, second sentence, replace *Beaver Lake* with *Taylor South*.

## APPENDIX A - LIST OF RELATED ENVIRONMENTAL REVIEWS

Second paragraph, additions to the bullet statements are in bold:

- Upper Stryker Ridge II (EIS completed in 1996, **harvest completed in 2000**)
- Stewart Butcher Timber Sale (Environmental Assessment [EA] completed in 1998, **harvest completed in 2000**)
- Beaver '99 Timber Sale (Beaver Lake Project EIS completed in 1999, **harvest completed in 2000**)
- Spring-Rock Timber Sale (EA completed in 1997, **harvest completed in 2000**)
- Stillwater Salvage 2000 (EA completed 2000, **harvest completed in 2000**)
- Chicken/Werner Timber Sale Project (EIS completed in 1999, **roadwork started in 2000**)
- Mud Creek Timber Sale (EA completed in 1997, **harvest completed in 1999**)
- Edmonds CT Timber Sale, (EA completed in 1997, **harvest completed in 2000**)

Third paragraph, first bullet, addition in bold: **Beaver 2000** Timber Sale (Beaver Lake Project EIS completed in 1999, **roadwork started in 2001**)

Second column, first bullet under last section, correct misspelled word: ... Owen and Hurst **Lumber** Company...

#### APPENDIX B - STIPULATIONS AND SPECIFICATIONS

Page B-3, under SNAG RETENTION, second bullet, first sentence should read: Snag retention and recruitment **would meet 1998 Biodiversity Guidance** by utilizing standards for warm/moist habitat type **groups**. Third sentence, insert phrase at beginning of sentence: **An average of**. Add fourth sentence: **The distribution of recruitment trees should be clumpy and preferably away from roadways.**

Page B-4, SOILS, under Compaction, third bullet, first sentence, delete phrase in parentheses: (*less than 300 feet*).

Page B-4, Soil Displacement, first bullet, after 40 percent add: **unless BMPs can be met.**

#### APPENDIX C - HYDROLOGY

Page C-3, under STREAM CHANNEL ASSESSMENT, second paragraph, first sentence, should read: Channel stability in the **lower portion of Swift Creek** is, generally, in the poor range.

Page C-6, second column, first full paragraph, last sentence, insert: **annual** after 5.6 percent. At the end of the same paragraph, add sentence: **The Chicken/Werner Timber Sale will increase the annual water yield to 5.9 percent.**

Page C-6, second column, second full paragraph, first sentence should read: Past harvesting in these **tributary** watersheds...

Page C-8, under *Direct Effects of Action Alternative C*, second paragraph, first sentence, change: 555 to 515.

Page C-9, under *Indirect Effects Common to Action Alternatives B and C*, second paragraph, replace with: **Due to the removal of the pilings supporting the bridge that would be removed, the potential exists for a short-term increase in turbidity. These pilings are located near the banks and all BMPs would be applied to minimize or eliminate sediment introduction. A 318 Authorization would be obtained prior to implementing this work.**

Page C-10, second column, just before the paragraph beginning "The bridge crossing the East Fork...", add heading, "**Cumulative Effects Common to Action Alternatives B and C**".

Page C-11, under *Cumulative Effects of Action Alternative C*, second paragraph, first sentence, change: 632 to 606.

#### APPENDIX D - FISHERIES

Page D-1, under METHODS, combine second and third sentences to read: "Although numerous ... and Flathead River, these are all managed by..."

Page D-2, under EXISTING CONDITION, second paragraph, fourth sentence should read: "No redds were found in the East Fork of Swift Creek, downstream of the lake, during ... "

Page D-2, under CUMULATIVE EFFECTS, second sentence, delete: **Lake**

Page D-3, under *Direct Effects Common to Action Alternatives B and C*, second column, replace last two bullet statements with:

- **Activities would take place from July 15 through August 20 as recommended by DFWP biologists.**
- **Activities may also take place if there is zero waterflow in the streambed.**

Page D-4, *Indirect Effects Common to Action Alternatives B and C*, second paragraph, replace with: The potential exists for a short-term increase in turbidity due to the removal of the pilings supporting the bridge that would be removed. These pilings are located near the banks, and all BMPs would be applied to minimize or eliminate sediment introduction. A 318 Authorization would be obtained prior to implementing this work. Since no spawning has been identified within the East Fork of Swift Creek, downstream of the bridge, it is unlikely that indirect effects to fisheries would result; however, timing restrictions would be placed on the work to minimize the potential for effects to fisheries.

Page D-5, second column, last two bullet statements, replace with:

- Activities would take place from July 15 through August 20 as recommended by DFWP biologists.
- Activities may also take place if there is zero water flow in the streambed.

#### APPENDIX E - VEGETATION

Page E-15, under *BACKGROUND*, insert sixth paragraph (no bold or indentation): Discussions on the subject of old-growth management of trust lands are ongoing and DNRC is currently revising its working definition of old growth based on definitions developed by Green et al. For additional information of how Green's definitions are related to the project area, refer to:

- ATTACHMENT E-1 - OVERVIEW OF OLD-GROWTH MANAGEMENT ON TRUST LANDS,
- ATTACHMENT E-1a - Information Item - State Land Board Meeting, Old Growth Guidance on School Trust Lands, Update on Technical Review Team Report, 12-18-00, and
- FIGURE E-1a - OLD GROWTH STANDS USING GREEN ET AL DEFINITIONS.

Within this FEIS Errata, ATTACHMENT E-1 will be located after Resource Appendix K - Soils.

Page E-17, under *OLD-GROWTH COMMITMENTS*, insert second paragraph: The STWE\_OGI\_00 SLI database lists 2 Ponderosa pine stands within the project area. The SLI updates account for timber harvesting within a portion of the original ponderosa pine stand in the 1995 Werner/Taylor Timber Sale, but did not update the original data for the uncut portion of the stand. The residual stand was inventoried again in August 2000 and does not meet the ponderosa pine cover-type criteria. Changes to update STWE\_OGI\_00 database were not made for this project.

#### RESOURCE APPENDIX F - WILDLIFE

Page F-1, under *INTRODUCTION*, first paragraph, second sentence, replace: there with *emulated*.

Page F-2, under *COARSE-FILTER ASSESSMENT, OVERVIEW*, first sentence, change: *likely still occur to occurs*.

Page F-16, under *LYNX (Lynx canadensis)*, third paragraph, second sentence, insert: *generally* after *average snow depths are*

Page F-18, under *Direct Effects Common to Action Alternatives B and C*, between first and second paragraphs, insert: A general analysis using stand types ranging from drier Douglas-fir to moister or cooler grand fir and subalpine fir and occurring within the proposed project area above 4,000 feet indicates 935 acres of potential lynx habitat is located within the entire project area. The 785 acres indicated in the *DEIS*, page F-18, refers to only northern sections within the project area and is not a complete summary of habitat within the project area. The amount of proposed harvest units within

potential lynx habitat is approximately 22 percent.

Page F-19, under *Cumulative Effects to Lynx*, insert at end of paragraph: Combined with the 105 acres of potential denning habitat that will be harvested in the Chicken/Werner Timber Sale Project, approximately 10 percent of the 3,000 acres of potential lynx habitat would be harvested within the Lazy Creek Grizzly Bear Management Subunit, the analysis area for lynx in this project.

Page F-27, TABLE F-7, end of heading, insert: (based on TIMBST\_97 database)

Page F-27, first column, after second paragraph, insert paragraph: TABLE F-7a—ACREAGE OF OLD GROWTH BY NUMBER OF LARGE LIVE TREES PER ACRE and TABLE F-7b—ACREAGE OF OLD GROWTH BY NUMBER OF LARGE SNAGS PER ACRE provide information concerning the quality of preferred pileated woodpecker habitat within old-growth stands in the proposed project area. The tables also present large tree and large snag information within and not within proposed harvest units and are based on STWE\_OGI\_00 database.

**TABLE F-7A—ACREAGE OF OLD GROWTH BY NUMBER OF LARGE LIVE TREES PER ACRE**

TREES MORE THAN 21 INCHES DBH PER ACRE	OLD GROWTH IN PROJECT AREA (ACRES)	OLD GROWTH NOT IN HARVEST UNITS (ACRES)	OLD GROWTH IN UNITS (ACRES)
Trees 21 inches or greater not reported in SLI	90	74	16
0 trees 21 inches or greater	126	115	11
1 to 5 trees 21 inches or greater	948	697	251
6 to 10 trees 21 inches or greater	410	401	9
11 or more trees 21 inches or greater	1,124	1,067	57
Total	2,698	2,354	344

**TABLE F-7b - ACREAGE OF OLD GROWTH BY NUMBER OF LARGE SNAGS PER ACRE**

SNAGS MORE THAN 21 INCHES DBH PER ACRE	OLD GROWTH IN PROJECT AREA (ACRES)	OLD GROWTH NOT IN HARVEST UNITS (ACRES)	OLD GROWTH IN UNITS (ACRES)
Snags >21" not reported in SLI	90	74	16
0 snags 21 inches or greater not reported in SLI	398	367	31
1 to 5 snags 21 inches dbh or greater	958	707	251
6 to 10 snags 21 inches dbh or greater	954	908	46
More than 11 snags 21 inches dbh or greater	298	298	0
Total	2,698	2,353	344

Page F-27, under Mitigations and their effects, replace second sentence with: Snag retention and snag recruitment guidance based on 1998 Biodiversity guidance would be met by both action alternatives (see Errata under Appendix B - Stipulations and Specifications and DEIS, Page B-4).

**APPENDIX G - ECONOMICS**

Page G-4, second full paragraph, fifth sentence, (second full sentence of the second column) make change:  
 ... approximately \$.056/acre (\$290,447 divided by 5,157,380) ..."

Page G-5, attach explanation to bottom of TABLE G-5-COSTS AND BENEFITS ASSOCIATED WITH THIS PROJECT BY ALTERNATIVE: TABLE G-5 was, in part, figured from Transaction Evidence Equations in May 2000.

Page G-5, following TABLE G-5-COSTS AND BENEFITS ASSOCIATED WITH THIS PROJECT BY ALTERNATIVE, insert paragraph and table: The following TABLE G-5a-COSTS AND BENEFITS ASSOCIATED WITH THIS PROJECT BY ALTERNATIVE (ERRATA) displays the current stumpage-value estimates as of January 29, 2001.

**TABLE G-5a - COSTS AND BENEFITS ASSOCIATED WITH THIS PROJECT BY ALTERNATIVE (ERRATA)**

	A	B	C
1. Estimated total harvest volume (MBF)		4,375	4,660
2. Development cost (\$/MBF)		64	60
3. Estimated stumpage value (\$/MBF)		132.19	134.23
4. FI (\$/MBF)		52	52
5. Estimated stumpage value, FI, and development cost (\$/MBF) (Line 2 + line 3 + line 4)		248.19	246.23
6. Total timber-dollar value based on estimated stumpage value, FI cost, and development cost multiplied by the estimated harvest volume (line 5 x line 1)		1,085,831.25	1,147,431.80
7. Estimated stumpage value and FI (\$/MBF) (line 3 + line 4)		184.19	186.23
8. Total timber-dollar revenue to the State (estimated stumpage value + FI cost multiplied by estimated harvest volume) (line 7 x line 1)		805,831.25	867,831.80
9. Total timber-dollar return to the trust (line 1 x line 3, does not include administration costs)		578,327	625,502
10. Other revenue related to the project area	6,090	6,090	6,090
11. Total dollar SSFI Costs (Table G-4 - total of costs)		102,760	76,785
12. SSFI costs (\$/MBF) (line 11 divided by line 1)		23	16

TABLE G-5a was, in part, figured from Transaction Evidence Equations in January 2001.



**APPENDIX H - AESTHETICS**

Page numbers should **Appendix H-  
Aesthetics** not **Appendix F-Wildlife**.

**APPENDIX J - AIR QUALITY**

Page *J-1*, under EXISTING CONDITION,  
first sentence, delete **s** on  
**populations**.

**APPENDIX K - SOILS**

No changes



## ATTACHMENT E-1 - OVERVIEW OF OLD-GROWTH MANAGEMENT ON TRUST LANDS

As part of its ongoing adaptive management, DNRC has proposed some changes to its Old-Growth Management Guidance. Additionally, a recent court ruling has resulted in the DNRC undertaking a rule-making process for its existing Biodiversity Guidance. These 2 factors resulted in some uncertainty regarding various aspects of old-growth management. One aspect that has been resolved is that DNRC has formally adopted the old-growth definitions proposed by *Green et al. (1992)*. This followed recommendations by a scientific review committee (Technical Review Team), who reviewed 3 options in regard to old-growth management of trust lands and made recommendations to DNRC in November 2000.

DNRC has updated the Land Board members and their staff on the results of the Technical Review Team (*ATTACHMENT E-1a, Information Items - State Land Board Meeting, Old Growth Guidance on School Trust Lands, Update on Technical Review Team Report, 12-18-00*). The 12-18-00 information item was formally accepted by the Land Board. Also accepted were the use of the *Green et al* definitions for old-growth; "Option 2" old-growth definitions would be used where SLI information does not allow the application of the *Green* definitions. "Option 2" definitions were provided to the public and the Technical Review Team in August 2000 for their old-growth review. Other items listed in Attachment E-1a, the "Information List" were tabled until the April 2001 Land Board meeting. Primarily these include how much old growth should be retained; this would help in identifying a process for delineating old-growth networks or reserves.

Also in regard to Biodiversity Guidance as a whole, a summary judgment was issued by Judge Sherlock in February 2001. With this ruling a temporary injunction was issued that prohibits the Department from harvesting old-growth timber until such time as the Department conducts rule making on the 1998 Biodiversity Guidance.

A second analysis of old-growth on the Taylor South project area has been conducted to display information on stands that meet the *Green et al* old-growth definitions. The SLI database queries were run for a coarse-filter view of stands meeting those definitions by specific *old-growth types*. *Old-growth types* relate habitat groups with trees within a specific size class per acre. Proposed harvest units were then surveyed for the actual level of trees per acre within the appropriate size class.

*FIGURE E-1a - OLD-GROWTH STANDS USING GREEN ET AL DEFINITIONS* displays the locations within the project area that potentially meet the old-growth criteria that are defined in *Green et al's* publication.

Approximately 48 acres within the proposed harvest areas meet the definition of old-growth based on *Green et al*. An estimated 19 acres are within Old-Growth Type 4, where an average of 10 trees per acre are to be greater than 21-inches dbh, and an estimated 29 acres are within Old Growth Type 5, where an average of 10 trees per acre are to be greater than 17-inches dbh. If harvested, these stands would no longer meet the *Green et al* old-growth definition.

Information Item - State Land Board Meeting  
Old Growth Guidance on School Trust Lands

**Update on Technical Review Team Report**

12-18-00

The DNRC would like to thank the members of the Technical Review Team for their diligent efforts regarding the review of Old Growth Management Options. We think they have provided the Department with a report that helps us move forward by clarifying some of the issues raised through our on-going process of old growth identification. Their efforts at achieving a consensus are greatly appreciated.

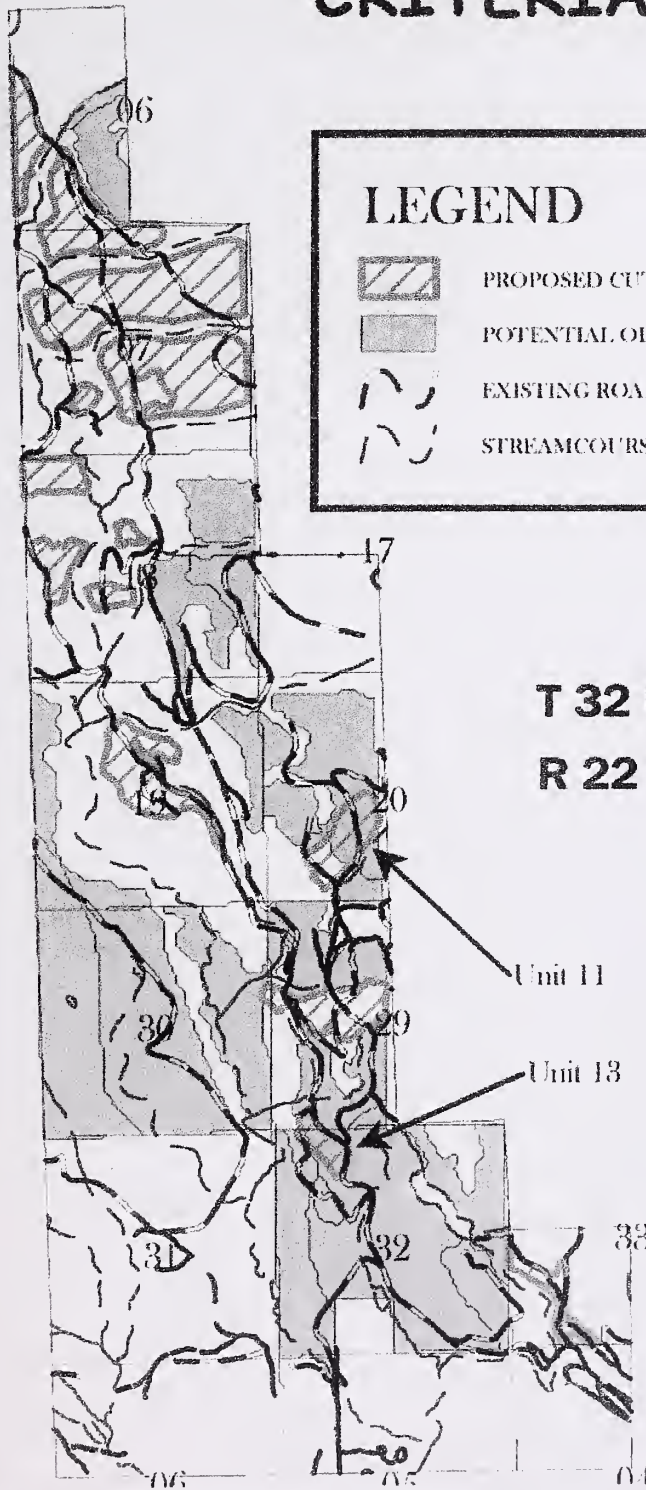
As part of their report the Technical Review Team provided a set of ten recommendations. The DNRC believes those recommendations provide us with a logical position from which to develop final implementation guidance. The recommendations are paraphrased below to account for current operational realities:

1. DNRC needs to determine a specific amount of old growth that will be retained. This quantification must be clearly tied to: SFLMP, ROD, reports and literature.
2. That amount would likely be within the range of 10 to 18.7%. Start from the RMS 6 commitment and clearly tie the amount to percentages described in the SFLMP-FEIS.
3. Decide within the organization how to meet that amount (or target) distributed among the various Units and Land Offices.
4. Adopt the Green *et al*, (1992) old growth definitions for minimum number of large trees where the data exists. Use the best available data to identify old growth where Green minimums cannot be quantified and field check them as soon as feasible to determine if they meet the quantitative criteria.
5. Identify on maps all old growth being used to meet our RMS 6 commitments.
6. Identify on maps replacement old growth stands and clearly state that there will be no harvesting in designated old growth, except as outlined in #9 below, until qualified replacement stands are available.
7. Develop a coarse filter desired future condition (DFC) that starts with the old growth commitment.
8. Develop a clear strategy for scattered sections that provides the flexibility to leave more old growth in areas with major harvesting and less old growth in areas with little harvesting.
9. Do not harvest in designated old growth unless it is part of a written ecological restoration prescription with the primary purpose of restoring or maintaining old growth characteristics.
10. Monitor Unit and Land Office compliance in designating old growth stands as soon as feasible.





It is DNRC's intent to draft final old growth guidance, present an interim strategy for existing sales, and identify a process for delineating old growth networks for Land Board approval in February.

FIGURE E-1a—OLD-GROWTH STANDS USING THE GREEN ET AL DEFINITIONS

# POTENTIAL OLD GROWTH ACCORDING TO GREEN'S CRITERIA



## LEGEND

-  PROPOSED CUTTING UNITS
-  POTENTIAL OLD GROWTH ACCORDING TO GREEN
-  EXISTING ROAD
-  STREAMCOURSE

3/12/01

T 32 N  
R 22 W

Unit 11

Unit 13









**TAYLOR SOUTH TIMBER SALE PROJECT**

**PROPOSED DECISION**



**TAYLOR SOUTH TIMBER SALE PROJECT**  
**PROPOSED  
DECISION**

This portion of the Final Environmental Impact Statement (FEIS) presents the proposed decision by Robert L. Sandman, Stillwater Unit Manager, Department of Natural Resources and Conservation (DNRC).

The scope of the proposed decision is limited to actions associated with the Taylor South Timber Sale Project Proposal. The proposed decision is site-specific and is neither programmatic nor a general management plan for Stillwater State Forest.

An interdisciplinary team (ID Team) has completed the Draft Environmental Impact Statement (DEIS) and prepared the FEIS for the Taylor South Timber Sale Proposal. After a thorough review of the DEIS, project file, public correspondence, corrections, and additions made by DNRC that were reflected in this FEIS, Department policies, standards and guidelines, and the State Forest Land Management Plan (SFLMP), Mr. Sandman proposes the following decision.

**1. PROPOSED ALTERNATIVE SELECTION**

Three alternatives were developed and are presented in the FEIS:

- No-Action Alternative A includes existing activities, but does not include a timber sale;
- Action Alternative B harvests approximately 4.4 million board feet (MMBF) from 14 units over 638 acres; and
- Action Alternative C harvests approximately 4.6 MMBF from 14 units over 632 acres (*DEIS, pages II-2 through II-10*).

No-Action Alternative A would not immediately affect cover types or stand-age classes. However, without treatment or disturbance, cover types would continue to shift toward shade-tolerant species and away from the desired future conditions. The percentage of area occupied by seedling/sapling-aged stands (0 to 40 years old) would continue to be low (*DEIS, pages III-6 through III-7*). Because fire suppression activities would continue, it is unlikely that natural disturbances by fire would occur similar to historic proportions. Also, DNRC's premise is that, for the foreseeable future, timber management will continue to be the primary source of revenue and primary tool for achieving biodiversity objectives.

Therefore, it is unlikely that Alternative A would move Stillwater State Forest in a direction that complies with the philosophy of the SFLMP or with acceptable levels of income for the school trust.

To varying degrees, both Action Alternatives B and C meet project objectives and could be chosen.

The proposed decision is to select Alternative B with the following modifications and specifications:

- a. In stands where there are desired leave-tree species, predominately sawtimber-sized western larch, western white pine, and Douglas fir, that are essentially insect and disease free, of good form, and have full crowns, those trees should be retained in a shelterwood density. This constitutes a compromise between the 2 alternative prescriptions in those few stands that have good leave-tree candidates.
- b. Some additional feathering of stand edges would be implemented, predominately along roadways to lessen visual effects.
- c. Unit 14 would be sold as a timber permit separate from this timber sale.
- d. If the Department were prohibited from harvesting old growth by lawsuit rulings, legislation, guidance modification, or Land Board decisions, then 29 acres of Unit 11 and all 19 acres of Unit 13 would be removed from harvesting with this timber sale. If this restriction changes during the life of the FEIS (5 years), these units may be sold as a separate timber permit.

- e. The stipulations and specifications listed in Appendix B would be implemented.

I have compared the modifications and specifications proposed for Action Alternative B to the analysis presented in the FEIS; I have concluded that the modifications and specifications are within the scope of the FEIS.

The rationale for this decision is presented in item 4.

## 2. RELATIONSHIP OF THE OBJECTIVES TO THE PROPOSED DECISION

- a. The modified Action Alternative B would produce an estimated \$578,000 return to the trust if sold in today's market.
- b. The timber sale is estimated to harvest between 3 to 5 MMBF.
- c. The bridge at Upper Whitefish Lake would be replaced.
- d. Long-term productivity and reductions in insect infestations and disease infections would occur. Timber stands would move toward the desired future cover-type condition.
- e. Options for sustained revenue to the school trusts would be maintained.

## 3. RELATIONSHIP OF THE ISSUES AND PUBLIC COMMENT TO THE PROPOSED DECISION

- a. Hydrology (*DEIS, pages III-2 through III-3*)

Repairs to Lower Whitefish and Taylor Creek roads would reduce sediment delivery to streams. The effects of the modified Action Alternative B may create a short-term

increase in sedimentation, but prescribed activities would lead to a long-term net benefit to water quality by eliminating several existing sources of sediment.

Cumulatively, the annual water yield for the Lower Swift Creek watershed would change from 4 to 6 percent, which includes all projects in the drainage. The entire Swift Creek watershed would change from 5.6 to 6.3 percent, cumulatively. These are below the allowable increase of 8 percent that was set by the SFLMP.

b. Fisheries (DEIS, pages III-4 through III-5)

Short-term increases in sedimentation are anticipated during the construction of bridge and road-improvement projects. All sites would result in a long-term reduction of sediment and long-term benefit to fisheries, including bull trout, in the project area. No measurable change in channel stability is expected.

c. Vegetation (DEIS pages III-6 through III-9)

Mixed-conifer stands would be reduced by 148 acres; western white pine stands would be increased by 115 acres; and the western larch/Douglas-fir stands would be increased by 33 acres. Harvesting would immediately reduce the number of acres infected by stem rot, dwarf mistletoe, and white pine blister rust by 638 acres. Between 395 and 450 acres would be regenerated with tree species similar to the results from a wildland fire. Western larch and rust-

resistant western white pine seedlings would be planted on 300 to 365 acres. The cumulative changes in age classes on Stillwater State Forest would be toward the desired future condition, with increases in younger age classes and decreases in older age classes.

Old Growth

Applying DNRC's 1998 Biodiversity Guidance, all old-growth acres would be reduced by 0.9 percent as a result of this timber sale, but would still exceed DNRC's commitment for retention. Across Stillwater State Forest, old growth for all cover types would be cumulatively reduced 816 acres. Also, Stillwater State Forest would exceed its old-growth-retention commitment by 686 acres for western larch/Douglas-fir stands, 5,279 acres for western white pine stands, and 6,628 acres for the mixed-conifer stands.

As part of DNRC's ongoing adaptive management, DNRC has proposed changes concerning old-growth guidance, and a recent court ruling has resulted in DNRC undertaking a rule-making process for the existing Biodiversity Guidance. These 2 factors result in some uncertainty regarding old-growth management. However, DNRC has formally adopted the old-growth definitions proposed by Green et al., (Old Growth Forest Types of the Northern Region, R-1 SES 4/92, USDA Forest Service, Northern Region, Missoula, MT). Using the new definition, approximately 48 acres within the proposed harvest units meet the definition of old

growth based on *Green et al.*, including 29 acres of Unit 11, and all 19 acres of Unit 13.

- d. Wildlife (DEIS, pages III-10 through III-13)

No substantial changes are expected in harlequin duck or boreal owl uses of Stillwater State Forest or adjacent private ownership due to changes in the structure and composition of the forest in general, the levels of human disturbance, or the modification to habitats.

Residential development, timber harvesting, firewood gathering, and recreational use may continue to reduce the available bald eagle nest and perch trees of suitable diameter, crown type, and security level within the home range of the Whitefish Lake bald eagle pair.

The loss of grizzly bear hiding cover on State ownership, and the probable further loss of hiding cover on other ownerships in adjacent areas, would continue to reduce grizzly bear security within the Lazy Creek Bear Management Subunit. The existing amount (greater than 60 percent) is well over the 40-percent minimum set by DNRC guidance.

Current State and adjacent private timber-harvesting activities would reduce security to wolves in the general vicinity of the project area. However, due to the existing road closures and amount of vegetative cover, no substantial change in wolf use of State or adjacent private lands is anticipated.

Current timber-harvesting

activities on State and adjacent private lands would reduce possible lynx denning habitat and security cover within the general vicinity of the project.

Preferred fisher habitat of mature forest stands would be less available within the general vicinity of the project area. Preferred fisher habitat on the adjacent Plum Creek Timber Company lands, which may be more suitable for fisher due to its lower elevation, would continue to decline. Within the Lazy Creek Bear Management Subunit, 1,183 to 1,185 acres of riparian fisher habitat would be retained. Fisher could still inhabit the general vicinity, but would probably avoid recently harvested areas.

Preferred pileated woodpecker habitat for mature forest stands would be less available within the immediate vicinity of the project. However, this project and the Chicken/Werner Timber Sale, just north of this project area, retain approximately 4,850 acres of available mature and old stands that are preferred by pileated woodpeckers.

Past, current, and future timber-harvesting activities on State and adjacent private lands have reduced, and would further reduce, white-tailed deer security and thermal cover within the general vicinity of the project area.

- e. Economics (DEIS, pages III-14 through III-15 and Errata page E-6)

In today's market conditions, the selected alternative will generate approximately

\$578,000 in trust revenue. In addition, the sale will produce approximately \$227,500 in forest improvement (FI) collections and fund approximately \$280,000 for roadwork and bridge replacement.

f. Aesthetics (*DEIS, pages III-16 through III-17*)

The effects of the modified Action Alternative B would result in limited views into harvest units and portions of harvest units that are visible from various vantage points, but the pattern of cover would vary from clearcut with reserves to shelterwood to spots of group retention. The result will be similar to a moderately intense wildland fire.

g. Recreation (*DEIS, pages III-18 through III-19*)

Winter logging operations could increase the number of conflicts between snowmobilers using the project area and loggers. As a whole, recreational access and recreational revenues are not expected to change. Conflicts at Smith Lake should not significantly change.

h. Air Quality (*DEIS, pages III-20 through III-21*)

Air-quality effects should not exceed allowable levels defined by the State Montana Smoke Management Plan and managed by the Montana Air Shed Group.

i. Soils (*DEIS, pages III-22 through III-23*)

The area of soils affected would be limited to less than

15 percent of the total area of combined harvest units. Existing skid trails would be used to avoid cumulative impacts to soils; mitigation measures would be implemented to comply with BMPs and maintain long-term soil productivity.

j. Irretrievable and Irreversible Commitments (*DEIS, page III-24*)

The trees harvested that are more than 150 years old would be irretrievably lost, but their loss would not be irreversible.

The project area is located on State-owned lands, which are principally valuable for the timber that is on them, growing timber, or watershed protection (*Montana Codes Annotated [MCA] 77-1-402*). The proposed timber sale is similar to past projects that have occurred in the area.

The proposed timber sale conforms to the management philosophy adopted by DNRC in the SFLMP and is in compliance with existing laws, policies, guidelines, and standards applicable to this type of proposed action.

4. RATIONALE FOR THE PROPOSED DECISION

a. The modified Action

Alternative B is consistent with the goals, objectives, and standards of the SFLMP, and appears to best meet most vegetation-related objectives. Portions of Unit 11 and all of Unit 13 contain old-growth characteristics that meet the *Green et al* definition. Unit 11 totals 42 acres with 29 of these acres being classified as old growth by the *Green et al* definition. This unit is located between open roads, has been previously harvested, does not contain the desired species mix, and has a number of pockets within the stand that have very few large live trees per acre. Unit 13 totals 19 acres with all of these acres being classified as old growth by the *Green et al* definition. The western larch in this unit is deteriorating due to mistletoe infection (a disease problem), is located next to an open road, and is being cut and removed by woodcutters. Both units are small portions of much larger old-growth stands. That either of these units would be included as part of an old-growth reserve is remote.

b. The modified Action

Alternative B is anticipated to provide a net return to the trust of \$578,000 and provide some jobs and income for northwestern Montana in today's market. If acres classified as old growth in Units 11 and 13 are removed from this timber sale, the net return to the trust would be reduced to approximately \$511,500. If additional acres were removed due to other restrictions, the net return

would need to be calculated.

- c. Of the alternatives that meet the project objectives, the modified Action Alternative B appears to best address the comments and issues submitted by the general public.
- d. Implementation would result in a long-term benefit to water quality and fisheries by reducing chronic sources of sedimentation.
- e. The prescribed treatments for the modified Action Alternative B should do the best job of emulating natural disturbances, treating current insect and disease infections, and promoting a species mix more in line with DNRC's desired future condition.

Summary

Overall, the modified Action Alternative B complies with the philosophy of the SFLMP by harvesting timber in a manner that moves Stillwater State Forest toward appropriate conditions while generating revenue and limiting effects to other valuable resources.







**TAYLOR SOUTH TIMBER SALE PROJECT**  
COMMENTS AND RESPONSES



## COMMENTS AND RESPONSES

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McMahon, Michael

From: McMahon, Michael  
Sent: Wednesday, January 10, 2001 1:40 PM  
To: 'mronlaret@dfgsls.net'  
Subject: Taylor South DEIS

Mr. Breen,

We have received your letter concerning the Taylor South Draft Environmental Impact Statement (DEIS). I believe you asked for and received only the Executive Summary of the DEIS. I wanted to let you know the DEIS and several appendices, including the appendix related to Air Quality, are on the internet at [www.dnrc.state.mt.us](http://www.dnrc.state.mt.us).

We will also notify you when the Final EIS is available. Thank you, Michael McMahon

RECEIVED  
DEC 27 2000

23 December 2000

Mike McMahon  
Project Leader  
Stillwater State Forest  
P.O. Box 164  
Olney, Montana 59927-0164

Subject: Taylor South Timber Sale Project Draft Environmental Impact Statement(DEIS)

Dear Mr. McMahon;

Following are my comments on the subject project.

The Flathead valley is plagued with continuing and increasing deterioration of air quality. The local air pollution is particularly harmful to our children whose respiratory systems are still developing, the elderly, people with lung disorders and those who work strenuously in the outdoors. The costs in terms of public health attributable to contaminated air are high but difficult to quantify because of its long-term effects.

Causes of dirty air here in the Flathead are many and not confined to logging activity. However heavy truck traffic on unsurfaced roads substantially contributes to the problem. As a means of mitigating the hazards of dust and smoke I request the following conditions be placed on this project regardless of which option is finally selected.

1. Hauling of logs on unsurfaced roads should be restricted to the months of higher precipitation namely October through April.
2. If logs are hauled in the summer months unsurfaced roads should be treated with dust suppressant.
3. Slash burning should not be allowed. Modern and environmental friendly logging methods can be employed to eliminate this source of air fouling. Slash can be chipped or scattered and scarified to improve forest soils.

1

Additional comments:

1. Your request for additional mitigation measures has been reviewed by the decisionmaker and may be considered in either the proposed decision of this FEIS, a Decision Memo, or in the Record of Decision. For additional information on Stillwater State Forest's standard and planned mitigation measures for air quality, see APPENDIX B - STIPULATIONS AND SPECIFICATIONS (page B-4) of the DEIS, as well as APPENDIX J - AIR QUALITY. Appendix J is available at [www.dnrc.state.mt.us](http://www.dnrc.state.mt.us).

2 The Final Environmental Impact Statement (EIS) document should include all comments from the public and the Agency's response.

3 The format of the EIS should contain a list and definition of all acronyms and abbreviations used, preferably on the inside of the front cover for ease of reference.

Please include me on your mailing list for the final EIS.

I appreciate this opportunity to comment.

Yours truly,



Bill Breen  
335 Mountain Meadow Road  
Kalispell, Montana 59901-8407

Phone 406-755-2142  
e-mail <montanab@digisys.net>

2. The FEIS does include all comment from the public; agency response is reflected in the FEIS under the Errata section, the Proposed Decision section, and/or in the Comments and Responses section.

2. The DEIS and FEIS both contain a list of acronyms and a glossary of terms, which are listed in the Table of Contents.



INDIVIDUAL OR AGENCY COMMENTS  
(NONWRITTEN)

PROJECT: Taylor South Timber Sale Project  
DATE: January 2, 2001  
PERSON/AGENCY COMMENTING: Jo Mahler  
ADDRESS/PHONE NUMBER:  
TYPE OF CONTACT (PHONE, OFFICE VISIT, ETC.): Phone  
NAME OF PERSON RECEIVING COMMENTS: McMahon

COMMENTS (QUESTIONS, POINTS OF EMPHASIS, ETC.):

Jo wanted some clarification on the Executive Summary. She wondered how Alternative C, which says it "would leave more trees", could return more money to the trusts?

Jo's main concerns are visual.

YOUR RESPONSE:

Good question; I stated that Alternative B plans on heavy cutting in 80 to 85 percent of the area shown on the maps and that those other 15% would not be heavily logged. Alternative C cuts most of the areas shown, yet leaves a few more trees per acre.

I suggested to Jo that she write a note to us on her preferences, so that it will be in full detail in the FEIS. I also stated that when I find the document on the internet I would call her so she can read "the Aesthetic Resource Appendix."

1. Our intention was not to make our proposed actions appear to have only negative impacts; our belief is that the project was designed to have numerous positive results. Thank you for the suggestions.

RECEIVED  
JAN 03 2001

**F. H. STOLTZE LAND & LUMBER CO**

*Lumber Manufacturers*  
Box 1429 • Columbia Falls, Montana 59912  
Phone: (406) 862-7000 • FAX: (406) 862-7412  
E-mail: [fsstolz@cyllberco.com](mailto:fsstolz@cyllberco.com)

December 28, 2000

Rob Sandman - Unit Manager  
Stillwater State Forest  
P.O. Box 164  
Olney, MT 59927

RE: Taylor South Timber Sale Project

Dear Rob:

You and your crew must be complimented on the Environmental Documents you have prepared for the proposed Taylor South Timber Sale! They certainly show a lot of effort and dedication. Your goal of making a more user-friendly document has been achieved. The plan displays very well what is planned to be done in this project.

I do have some specific comments to make:

1. Why do you avoid making strong, bold, positive comments about Forest Land Management and the need to manage our forestlands? Recent research has shown many benefits to the ecosystem by managing and harvesting our forests. There are some meek positive statements in the DEIS in Chapter III under cumulative effects for some of the areas of concern. Table II also occasionally mentioned a positive benefit. However, I must say that my overall impression after reviewing all three documents is that the proposal will have a negative impact on the environment and State Forest Land. I do not believe this is true.

As a suggestion, look at the positive points and/or benefits before looking at the negatives. For example in Table II after the "Existing Condition" column have a column titled "Positive Effects of Each Alternative" then go on with Direct, Indirect, and Cumulative effects. In Chapter III a "Positive Effects" section could be included after the "Existing Condition" discussion.

I realize the mandate for School Trust Lands is providing income to the School Trust, however, the DEIS covers 11 areas of concern with economics being only one of these. I believe we can show positive



Established in 1912  
18th Anniversary



F. H. STOLTZE LAND AND LUMBER COMPANY  
(BUENTEMEIER)

Bob Sandman  
Page 2

- benefits to all these areas of concern!
2. I would encourage you to adopt Alternative C for several reasons.
- (a) The highest return to the School Trust is accomplished.
  - (b) There will be less hazard reduction and reforestation work required.
  - (c) Old Growth retention levels will be higher.
  - (d) Aesthetics will be improved.


3. There are two areas in your "Resource Appendices" which I am concerned about.

2 (a) On page G-8 there is a concern listed regarding damage that might occur to the East Lakeshore road if logs are hauled over this route. This road currently endures very heavy truck traffic from construction equipment, cement trucks, dump trucks, pre-mix trucks and building material trucks. Log trucks do not carry any more axle weight than the above trucks. It is also fair to point out that log trucks pay more in taxes than the above do for support of road construction and maintenance. They should not be discriminated against. Also limiting their time of travel is discriminatory.

3 (b) On page G-9 there is the statement that there would be "No change to the area's economy -----" under the no action alternative. There is no substitute timber available! Per your own figures there are 10.58 direct jobs per MMBF of timber harvested. Also you have not considered the loss in revenue to the School Trust by not managing these stands for future production. You can only "store" the value on the stump for a limited period of time then that value is lost. You must manage the School Trust Lands so that they are in a healthy condition, producing maximum growth each year.

The Taylor South Project is a good project, however, let's present the positive benefits of Forest Management.

Sincerely yours,



Ronald H. Buente-meier  
Timber Manager

RHB/h

ENC: Bud Clinch, Cary Hebreberg

2. We acknowledge your concerns in regard to uses of East Lakeshore Drive.
3. The same paragraph referenced on page G-9 goes on to say that "Lack of a viable substitution could result in a negative effect on either DNRC's annual cash flow or the area's economy." One may derive that the no-action alternative would also affect the direct jobs per MMBF, this has been answered in the second paragraph under JOBS AND INCOME, page G-3.
4. Under No-Action Alternative A, a loss of revenue may result by not managing these stands for future timber production. The economic section of the DEIS did not give dollar values, but under VEGETATION - APPENDIX E, page E-12 losses are recognized in relation to:
- sawlog volume recovery,
  - mortality,
  - lack of western white pine being regenerated, and the potential for losses to wildfire.

INDIVIDUAL OR AGENCY COMMENTS  
(NONWRITTEN)

PROJECT: Taylor South Timber Sale Project  
DATE: January 5, 2001  
PERSON/AGENCY COMMENTING: Tom Thomas  
ADDRESS/PHONE NUMBER:  
TYPE OF CONTACT (PHONE, OFFICE VISIT, ETC.): Phone  
NAME OF PERSON RECEIVING COMMENTS: McMahon

COMMENTS (QUESTIONS, POINTS OF EMPHASIS, ETC.):

Tom has received the DEIS Executive Summary.

1. He asked if there was any road construction within the project area that may help an access problem for his neighbors along East Lakeshore Drive.
2. Tom asked if there would be consideration to add in access roads to the project.

YOUR RESPONSE:

1. I steered him to page 5 of the Summary and stated that no road building would occur near that location.
2. I stated that access would not be considered in this project, but if there was a proposal at some point in the future, we would like consider it and that proposal would be written up under a different environmental document. I also stated that , at this time, roads in Section 33 are not suitable for access purposes due to their location and grades (steepness) and that DNRC would not be the ones to locate future feasible access roads.

**INDIVIDUAL OR AGENCY COMMENTS  
(NONWRITTEN)**

PROJECT: Taylor South Timber Sale Project

DATE: January 5, 2001

PERSON/AGENCY COMMENTING: Burt Sugarman

ADDRESS/PHONE NUMBER: (310) 273-5678

TYPE OF CONTACT (PHONE, OFFICE VISIT, ETC.): Phone

NAME OF PERSON RECEIVING COMMENTS: Bob Sandman

**COMMENTS (QUESTIONS, POINTS OF EMPHASIS, ETC.):**

1. Burt commented that he liked the Executive Summary.
2. He questioned why an increase in water yield was okay given the concerns we have had with activities in Swift Creek on his property.
3. He wondered if his neighbor had contacted us.
4. He asked if there was a preference for an alternative by folks commenting.
5. He asked if I would call him near the end of the comment period to discuss this topic.
6. He asked about buying or trading for the property he leases from DNRC.
7. He asked me to get him on the mailing list for Special Uses Bureau's Programmatic Plan and EIS.

**YOUR RESPONSE:**

2. I explained the difference between actions directly affecting the streambank/channel and activities that impact water yield away from the streambank. I said the water yield increase was expected to be within our guidelines. I also said this project would continue past efforts to complete improvements to our road system, which can contribute sediment to streams.
3. His neighbor has contacted neither Mike McMahon or me.
4. I said at this early date in the comment period it was too early to say.
5. I said I would.
6. I said the new Land Board may take a different position that the previous Board, but it is still too early to know. I recommended that he get on the mailing list for the Special Uses Bureau's Programmatic Plan and EIS.
7. Margaret Beck sent his name and address to Jeanne Fairbanks and Mike Kress in Missoula.

1. Discussions about the bridge at Upper Whitefish Lake were limited in the DEIS. The Errata section of the FEIS inserts a description of the need and costs of replacing the bridge (see Chapter I)
2. Civil engineers analyzed the cost and design criteria for a new bridge at this site approximately 15 years ago. Maintenance and repair work was completed and has allowed the bridge to remain open for loads up to 3 tons. For a long-term, economical solution, a concrete bridge replacement is needed to provide continued access, meet water-quality standards, and allow for fish passage.
3. The timing of the bridge replacement was discussed in relation to recreation in Appendix I - Recreation, page I-2, Direct Effects Common to Alternatives B and C. The existing bridge would be maintained for crossing during the installation of the new bridge; the new bridge site is located east of the existing site. After discussing the project with DFWP fishery biologists, the recommended time frame for the bridge replacement is July 15 through August 20 to produce the least amount of risk to fish.
4. Your input has been reviewed by the decisionmaker and may be considered in either the Proposed Decision section of this FEIS, a Decision Memo, or in the Record of Decision.
5. Your input has been reviewed by the decisionmaker. When another opportunity arises to address the Smith Lake area, we will contact you.

RECEIVED  
JAN 16 2001  
January 11, 2001

Mike McMahon  
Stillwater State Forest  
P.O. Box 164  
Olney, MT 59927

Dear Mr. McMahon:

Thank you for allowing me to comment on the Draft EIS for the Taylor South Timber Sale Project. I am a board member of the Whitefish County Water and Sewer District, as well as a participant in the Swift Creek Coalition. My comments here, however, are mine alone and I do not wish them to be attributed to either organization.

- 1 I found the format of this document to be refreshingly readable and thorough, with one exception. I could not find any documentation supporting the need to replace the existing bridge at Upper Whitefish Lake. I am familiar with the poor condition of the bridge, but if there are no less expensive alternatives to complete replacement, I think this fact should be addressed. Also, the timing of the bridge replacement seems likely to conflict with summer recreation in the area, and I wonder if the work could be carried out earlier in the season (May-June), or later (Sept.-Oct.), when recreational use would likely be less.
- 2 As to the three harvest alternatives, I support alternative B over the other two. I am satisfied that adequate protection of water quality would be maintained under either action alternative, but I believe the long-term forest health would be better served by alternative B. I chose this alternative because I believe the group retention method provides the remaining trees with greater resistance to wind throw and drought conditions. One need not look very hard to find shelterwood cuts in which most of the seed trees are either on the ground or standing dead. A third action alternative might have provided for a mix of prescriptions, utilizing the shelterwood method on units whose aspect and topography afford the seed trees a greater likelihood of survival.
- 3 Finally, I encourage the state to conduct an analysis of the Smith Lake area. I live very near the lower road, and frequently recreate around the lake. The area has suffered in recent years, due largely to unsupervised use by persons gaining access via the upper road. I believe the area good be better protected while simultaneously being developed into a revenue producing recreational site, and would happily participate in any discussions aimed at preserving this area.

Thank you,



Richard Stevens  
3358 E. Lakeshore Dr.  
Whitefish, MT 59937



**FRIENDS OF THE WILD SWAN  
P.O. BOX 5103  
SWAN LAKE, MT 59911**

January 12, 2001

Stillwater State Forest  
Attn: Bob Sandman  
P.O. Box 164  
Olney, MT 59927-0164

Dear Mr. Sandman:

Please accept the following comments on the Taylor South Timber Sale Draft Environmental Impact Statement on behalf of Friends of the Wild Swan and The Ecology Center.

**Water Quality**

- 1 • DNRC dismisses the need for a Total Maximum Daily Load (TMDL) for Swift Creek because it is a low priority on the 1996 303(d) list. However, DEQ is required to complete TMDLs for all impaired waterbodies on the 1996 303(d) list by May, 2007. As a state agency DNRC should be working with DEQ to complete a TMDL.
- 2 • Watershed RMS #1 states, "DNRC would manage watersheds, soil resources, and streams, lakes and wetlands, and other bodies of water to maintain high quality water that meets or exceeds state water quality standards, and to protect designated beneficial water uses." (emphasis added) However, it appears that DNRC believes that HB 546 allows them to continue impairing listed waters if you use BMPs (Page C-2). Please explain how DNRC intends to comply with its RMS or if you are not going to comply with it provide an explanation of why you believe that is acceptable.
- 3 • Channel stability in the Swift Creek watershed is poor, yet DNRC intends to increase water yield to near threshold levels (Page III-3). Since this is based on modeling it does not appear to allow for natural variability or a high runoff event. Please disclose what on-the-ground monitoring has been and will be done to comply with Watershed RMS #20 and #21.
- 4 **Fisheries**
  - The mitigation measures for bull trout appear to be contradictory: one states that activities would not take place during the migration period another states that activities would take place during low-flow, or no-flow season. Bull trout migrate during the summer months when flows are decreasing. Please clarify exactly when activities would occur.
- 5 • How is DNRC assuring that "no additional sediment loading" will occur as a result of this project?
- 6 • Please disclose whether DNRC intends to monitor the criteria developed by the Montana Bull Trout Restoration Team's Science Group and outlined in the technical paper, *The Relationship Between Land Management Activities and Habitat Requirements of Bull Trout*. If not,

REC  
JAN 17 2001

1. Currently, DNRC is working with the Department of Environmental Quality to produce a TMDL for the West Fork of Swift Creek.

2. According to the State water-quality standards, the pertinent criteria for A-1 classified waterbodies is "...no increases are allowed above naturally occurring concentrations of sediment..." as disclosed on page C-2 of the Resource Appendices. 'Naturally occurring' includes conditions or materials present from runoff on developed land where all reasonable land, soil, and water conservation practices have been applied. The TMDL Law (75-5-703, MCA) allows management to continue in watersheds in need of a TMDL, with the restriction that activities must employ all reasonable land, soil, and water conservation practices. Management of resources in a watershed does not always result in furthering the impairment of streams. The Taylor South Timber Sale Project is designed to improve the quality of water in Swift Creek by removing direct sediment sources and improving roads to meet current BMP standards. In addition, buffers adjacent to streams will be retained to filter runoff. This rationale supports compliance with the SFLMP Watershed RMS 1.

3. Channel stability in the tributaries to Swift Creek is in the good-to-fair range for most of the reaches. The channel stability in Swift Creek is considered poor due to the naturally slumping clay banks. This error will be updated in the errata.

Water-yield thresholds of concern are set according to Watershed RMS 7 of the SFLMP. As stated in the RMS 7 Guidance, "...allowable water yield increases in the Stillwater, Coal, and

please explain why DNRC, as a state agency and Restoration Team member, feels that it should not implement the Science Group's report since Swift Creek is a core bull trout area.

Old Growth

7 • DNRC should not be planning timber sales in old-growth forest habitat until it has completed its old growth definition process. The technical review committee made several recommendations, none of which is completed. Nor are they referenced or contained in this EIS. Recommendations include: using the Green et al definitions to determine old-growth, decide how much old-growth will be put in reserves, identify the reserves on a map, identify replacement old-growth, and in the meantime stay out of old growth. The Taylor South EIS is using the definition and full old growth index that was found to be inadequate. Please explain how (or if) DNRC intends to comply with the technical review committee's recommendations.

8 • Please explain why DNRC wants to log 150+ year old ponderosa pine stands when ponderosa pine is one of the most fire resistant trees and comprises only 1% of the Stillwater State Forest.

9 • Please disclose whether western red cedar is lumped in with mixed conifer. If so, how much western red cedar will be logged? Are they in any of the eight identified old growth stands?

Wildlife

10 • Please explain why DNRC believes that 1996 road densities levels are an acceptable threshold and why Total Road Densities (TRD) of 71% greater than 2 mi./sq mi and Open Road Densities (ORD) of 46% greater than 1 mi./sq mi are not a "taking" of the grizzly bear. Especially in light of the fact that the Swan Valley Conservation Agreement limits open road densities on the Swan River State Forest to 33% (1 mi./sq mi) of a BMU subunit with a long-term goal that no more than 21% of a BMU subunit shall exceed an open road density of one mile per square mile. On the Flathead National Forest the biological opinion for Forest Plan Amendment 19 sets the acceptable level of incidental take at <19% in excess of 1 mile/square mile ORD, <24% in excess of 2 mile/square mile TRD in 5 years and <19% in 10 years, and >60% in security core in 5 years and >68% in 10 years.

11 • In the absence of standards to protect lynx why does DNRC believe that reducing lynx denning habitat by 26% in the project area alone will not result in a "taking" of lynx?

12 • Please disclose what measures or standards DNRC has developed to protect lynx and lynx habitat.

13 • Please explain why a site-specific bald eagle nest plan has not been completed when this project occurs 1/4 mile from an active and productive bald eagle nest. We could find no monitoring plan for the nest either, how will DNRC determine whether the eagles are being affected during project implementation?

Economics

14 • Please disclose whether DNRC used current stumpage prices in its economics analysis.

15 • Please disclose why DNRC believes the stumpage value is realistic in light of the fact that millions of board feet on the Flathead and Kootenai National Forests went unsold in fiscal year 2000.

Swan State Forests will be limited to levels which pose a low degree of risk to the beneficial water uses and watershed values." With this in mind, the annual water-yield threshold of concern was set at an increase of 8 percent over natural undisturbed levels. This level is very conservative and is implemented only on the more unstable streams.

A complete list of all monitoring completed in response to the SFLMP can be found in the SFLMP Implementation Monitoring Report for Fiscal Years 1997 through 2000.

4. The bridge replacement on the East Fork of Swift Creek would be limited to a July 15 through August 20 time period, per recommendations from DFWP fisheries biologist.

5. A sediment-source inventory to identify sources of sediment in the Lower Swift Watershed was started in 1999 and completed in 2000. The Taylor South Timber Sale Project would be implemented using BMPs to minimize or eliminate the introduction of sediment from new sources and to eliminate existing sources within the project area. By meeting BMPs and providing adequate vegetative filtration, additional sediment loading will not likely occur.

The Fisheries RMS 2 (Attachment 1) of the SFLMP mimics the Flathead Basin Forest Practices and Fisheries Cooperative Program Recommendation 17 with the following guidance for 'impaired' streams, "If any disturbance activity is planned in the watershed, the landowner should take proactive steps to insure that no additional sediment loading occurs as a result of new land disturbance activity." A stream is considered impaired if the percentage of fine material in



spanning gravels in any given year is greater than 40 percent or if the substrate score (measure of embeddedness) is less than 9. Current data on the East Fork of Swift Creek exhibited a substrate score of 12.2 and 31.2 percent of fine materials in spawning gravels. No substrate scoring or percentage of fine material data has been collected on the main stem of Swift Creek, as disclosed on page D-2 of the Fisheries Resource Appendix. Using this data collected by DFWP, the East Fork of Swift is not considered to be an impaired stream according to the recommendation listed above.

6. As stated in Restoration Plan for Bull Trout in the Clark Fork River Basin and Kootenai River Basin Montana (June 2000), "The Relationship Between Land Management Activities and Habitat Requirements of Bull Trout is not meant to replace other existing approaches for protecting and conserving bull trout." However, several of the parameters (discharge, nutrients, channel geometry, substrate scores, McNeil cores, channel stability, temperature) recommended in the technical report are currently being monitored by DNRC. These parameters would continue to be monitored as budgets allow. Additional recommended parameters would be monitored as funding allows.

7. Please review the ATTACHMENT E-I - OVERVIEW OF OLD-GROWTH MANAGEMENT ON TRUST LANDS contained in the ERRATA AND ADDITIONS section of this FEIS.

8. The 150+-year-old ponderosa pine stand within the proposed Unit 12 is, in part, the result of Stand Level Inventory (SLI) update procedures. The 8 acres are the remaining uncut portion of a larger stand that was harvested in 1995 with the

Cumulative Effects

- We saw the words cumulative effects many, many times in the EIS and appendices, however we still do not have a clear idea of the juxtaposition of the numerous timber sales cited in the documents, the timing of the sales, and what the effect of these sales will cumulatively have on water quality, fisheries, old-growth forests and wildlife.

Sincerely,

  
Arlene Montgomery  
Friends of the Wild Swan

for  
Lauren Buckley  
The Ecology Center

Werner/Taylor Timber Sale Project. During SLI updates in 1996, the only portion of the original stand that was updated was the cut-over portion.

Further reconnaissance showed this residual stand contains only a few ponderosa pine, and mostly lodgepole pine, grand fir, Douglas-fir, and some western larch. In August 2000, an updated SLI sheet was filled out on the residual stand, so that Full Old-Growth Index (FOGI) information may be provided. This SLI update, which is not in the STWE\_OGI database, gives ponderosa pine a 10-percent representation within the stand, no longer qualifying for a ponderosa pine type. APPENDIX E - VEGETATION, Page E-23, discusses the probability that stands may be reinventoried with adjustments made to stand boundaries, which may change the old-growth status.

9. Western red cedar is likely within all cover types on this project area. There is a very small distribution of western red cedar within the project area; the largest concentration is approximately 4 acres along Trail Creek, which is not included in any proposed harvest unit. Individual western red cedar trees are scattered within the proposed harvest units. Potentially, 20 mbf, several truck loads in total, of cedar would be harvested. None of the 8 western red cedar stands referred to in VEGETATION - APPENDIX E, page E-19, are in the project area.
10. DNRC selected 1996 road densities as the appropriate baseline because at that time, road inventories were most complete for calculations using the Moving Windows Analysis and DNRC began new management direction with the SFLMP. While DNRC has the responsibility to minimize risk of

(under Sections 9 and 10(A) of the Endangered Species Act), USFWS is the agency charged with determining when "take" occurs. Only Federal agencies are responsible for recovery of species and their habitats (under Section 7 of the Endangered Species Act). The cooperative Swan Valley Grizzly Bear Conservation Agreement was specifically designed for a landscape with a unique ownership pattern, heavily influenced by non-Federal lands. The guidance and intent is different for this agreement in comparison to the Flathead National Forest Amendment 19. DNRC believes that adhering to current guidance is sufficient to meet SFLMP standards, avoid "take" of grizzly bears or their habitat, and minimize impacts to grizzly bears. The proposed project was designed to use existing roads, or use restricted roads during the seasons of least disturbance to grizzly bears, and have no long-term increase in road density.

11. DNRC has had guidance in place for lynx since 1998. Specific considerations deemed important to consider for this project area included:
- the general area has relatively high snow accumulations,
  - there have been recent, local lynx sightings, and
  - the project area is generally surrounded by higher elevation topography.

Approximately 200 acres representing potential, although marginal, lynx habitat would be harvested. This does not represent the typical, preferred habitat that would be critical to lynx denning activity within Stillwater State Forest. Roughly 80 to 90 percent of the potential lynx habitat (approximately 3,000 acres) within the Lazy Creek Grizzly Bear Management Subunit is being retained. This subunit is the lynx

analysis area for this project. The Federal Lynx Conservation Assessment and Strategy recommends patches of denning habitat be retained that are more than 5 acres on at least 10 percent of the area that is capable of producing stands with denning-habitat characteristics. Given the relatively low amount of disturbance, the application of mitigations, and eventual regeneration of browse and low security cover for snowshoe hares, current levels of lynx use in the general vicinity of the proposed project should continue.

12. DNRC is currently applying existing SFLMP Lynx Guidance that has been in place since 1998. Additional consideration, however, is given to broader habitat descriptions as contained in the Federal Canada Lynx Conservation Assessment and Strategy (page 46). On the proposed Taylor South Timber Sale Project, DNRC fully implemented our existing guidance and used other considerations in the Federal Lynx Conservation Assessment and Strategy deemed suitable for minimizing effects to lynx. For this project, 4,000 feet was used as a minimum elevation, stands outside of typical habitat were included in the analysis, and roadside vegetation buffers were retained. DNRC is currently in the process of revising the existing guidance to incorporate new research findings and conservation approaches. Copies of current DNRC lynx guidance are available upon request.
13. Paige (*Interim Report on the Swift Creek Bald Eagle Nesting Territory, 1991*) initially collected a majority of the data needed to complete a site-specific management plan for what was the "Swift Creek" territory at the time. Collecting information concerning forage

time. Collecting information concerning forage habitat, sensitivity to humans, and additional home-range use was recommended in order to complete a site-specific territory management plan. Since that time, the nest location has moved from private to State land. Management Plans need only be completed for isolated breeding areas or unique situations presenting intense or immediate conflicts (Montana Bald Eagle Management Plan 1994, page 26-7). DNRC is presently monitoring this nest in accordance with guidelines of the Montana Bald Eagle Management Plan. The proposed timber-harvesting activities were designed in accordance with the Habitat Management Guide for Bald Eagles in Northwest Montana.

DNRC is presently monitoring all known nests occurring on Northwest Land Office (NWLO) ownership in accordance with guidelines of the Montana Bald Eagle Management Plan, whether near active timber sales or not, either in partnership with other agencies or alone. Proposed timber-harvesting activities were designed in accordance with the Habitat Management Guide for Bald Eagles in Northwest Montana. Eagles within this territory have been monitored since 1984 (the new nest has been monitored since it was found in 1999) and will be monitored appropriately whether the proposed project is undertaken or not.

14. The stumpage prices used in TABLE G-5-COSTS AND BENEFITS ASSOCIATED WITH THIS PROJECT BY ALTERNATIVE of APPENDIX G - ECONOMICS, page G-5, were calculated from the Transaction Evidence Equation in May 2000. Calculations from January 2001 have been included in the Errata.

15. DNRC has not had the problem of selling timber on recent sales, except for one fire salvage sale. In some instances minimum bids have been set too high on other agency timber sales. The lumber markets have been very volatile in the recent past. The current lumber market has not been this low since the early 1990s. If the lumber market does not improve, the adjusted prices in this analysis may be too high. Transaction Evidence Equations are based on past timber sales; thus, if past conditions are very different from current conditions, the equation will not be a good predictor.
16. DNRC's GIS is not set up with database layers to construct a current map displaying all the harvest units from the timber sales listed in Appendix A-LIST OF RELATED ENVIRONMENTAL REVIEWS. Our records show that Friends of the Wild Swan has received EAs, FEISS, RODS, and Decision Memos on all of these sales. Timber sale contract maps are available at the Stillwater Unit office.
- Please see the Errata for the current status of the list of timber sales in Appendix A.
- The cumulative effects of these sales on the listed resources have been displayed in the DEIS and the appropriate resource appendices.

1. DNRC does try to balance the level of BMP work with costs; BMP measures are designed to meet the risks associated with the current conditions. The design criteria for BMPs are developed in conjunction with foresters, a hydrologist, and an engineer and are often the result of field reviews and State BMP audits.

RECEIVED  
JAN 18 2001

January 16, 2001

Bob Sandman -Unit Manager  
Stillwater State Forest  
P.O. Box 164  
Oliney, Montana 59927

Re: Comments on Taylor South Timber Sale Project

Dear Bob:

I am writing to offer a few brief comments in support of the Taylor South Timber Sale. I believe the Taylor South Project is a very worthwhile and necessary timber sale project. This timber sale proposal helps address some serious forest health, stand composition and productivity issues that are present in this project area. I like the two-stage entry approach that is proposed in Alternative C. There are a couple concerns that I have about this proposal and the language of the DEIS in general.

I support Alternative C as the preferred alternative for several reasons. The two-stage harvest approach helps reduce the visual impact of the harvesting while still encouraging the regeneration of shade intolerant species. This two-stage harvest approach is very similar the way Stoltze harvests stands that have a very large component of shade tolerant species. This shelterwood harvest with reserves prescription will be far more aesthetically acceptable to the general public than the clear-cut with reserves prescription that is the predominate prescription in Alternative B. Alternative C also produces the highest return to the School Trust with less hazard reduction and reforestation work required. Alternative C will also allow a second economically feasible entry into to these shelterwood prescriptions stands in 5 to 15 years. Old growth levels will also be higher in Alternative C than in Alternative B. These aspects of Alternative C make it a much more desirable and sensible choice than the other alternatives in this proposal.

1. There are some concerns that I have about this proposal. The large road reconstruction and maintenance packages included in this timber sale project and other DNRC timber sales require much more work and expense than I believe is necessary to meet the BMP standards. Each additional dollar spend on roadwork requirements is a dollar that is not return to the School Trust.

2 The makeup of most environmental documents including this DEIS emphasize the negative impacts of timber harvest with very few strong, positive statements about the benefits of the timber sale proposal. Timber harvest proposals have numerous positive effects on forest health and productivity, forage production, sediment delivery, the local economy and numerous other aspects of the forest. Emphasis on the negative creates a tone that timber harvest is inherently bad and everything in the document is trying to justify the harvest versus the positive impacts of harvest and the mitigation that is done to minimize the few minor negative impacts. I believe public acceptance of your projects would be far greater if strong, positive statements were made in the proposal. Even when I read these environmental documents, the feeling I come away with is defensive instead of positive. I believe the language in these environmental documents can show the positive benefits of all the areas of concern in these proposals.

The Taylor South Timber Sale proposal is a good project and I would support Alternative C as the alternative to be implemented for this project. Thank you for the opportunity to comment on this proposal.

Sincerely,



Tom Tintinger

2. As we responded to Mr. Buentemeier, Stoltze Land and Lumber Company, (page 4), our intention has not been to make our proposed actions appear to have only negative impacts, but believe our projects are designed to have numerous positive results.



**Steve Thompson**

Box 4471 \* Whitefish, MT 59937

Ph: (406) 862-3795 \* Fax (406) 862-5344 \* e-mail: sthomp@digsys.net

January 18, 2001

Rob Sandman, Unit Manager  
Stillwater State Forest  
P.O. Box 164  
Olney, MT 59927

RE: Taylor South Timber Sale Project

Dear Rob,

I thank you for meeting with me yesterday to discuss the Taylor South Timber Sale and DNRC's implementation of the Technical Review Team's recommendations on the old-growth guidance.

I have reviewed the Draft EIS for Taylor South, with particular emphasis on the vegetation sections. Overall, I commend the ID Team for a concise and clear discussion of the issues and project effects, both in the DEIS itself and in the technical resource appendices.

1 Predictably, I raise once again a concern about the old-growth analysis which is similar to sentiments that I and others in the Montana Old Growth Project have previously expressed in various meetings and letters to DNRC, including letters to you on the Beaver Lake project and Cyclone/Coal project. As you know, the independent Technical Review Team has validated many of our concerns, and DNRC has agreed to revise its old-growth policies based on the TRT's recommendations.

2 The TRT recommendations were sent to DNRC on November 27, 2000. On December 18, DNRC presented the recommendations to the Land Board and indicated intentions to use them to revise old growth policies. The DEIS was issued on December 19. Because of this tight timing, I understand why the DEIS does not base its analysis on the TRT recommendations and MOGP's long-standing requests, for example, to utilize the Green, et al, definition of old growth. However, I hope the old-growth discussion in the Final EIS will be revised to reflect the appropriate definition of old growth and new DNRC direction on this issue.

As you know, the Technical Review Team specifically recommends no current harvesting of potential old growth prior to establishment of the old-growth retention networks. As we discussed yesterday, I recommend that potential old growth be identified through an inventory query that is more restrictive than the current "old stand" criteria yet less restrictive than the minimum attribute levels identified by the Green committee. At this point, I don't know how many of the proposed units would meet the Green definition or a lesser quantitative threshold for potential old growth. I would like to see some discussion of this issue in the FEIS.

Specific concerns related to the vegetation and old-growth analysis include:

\* I do not agree that 38 percent of the analysis area can be characterized as old-growth forest. Similarly, I disagree that the Stillwater State Forest has 2.3 times as many old-

1. DNRC has agreed to review its old-growth policies and is still in the development phase of the guidance. Updated Biodiversity Guidance recommendations had been given to the Land Board prior to publication of the FEIS; the recommendation will be that this project be accepted with the old-growth analysis that was used for the DEIS, which is based on the 1998 Biodiversity Guidance.

2. For information on how Green's old-growth definitions relate to the project area, please refer to ATTACHMENT E-I - OVERVIEW OF OLD-GROWTH MANAGEMENT ON TRUST LANDS. This attachment includes E-IA - INFORMATION ITEMS - STATE LAND BOARD MEETING, OLD GROWTH GUIDANCE ON SCHOOL TRUST LANDS, UPDATE ON TECHNICAL REVIEW TEAM REPORT, 12-18-00, and FIGURE E-1A - OLD GROWTH STANDS USING GREEN ET AL DEFINITIONS. (Within this FEIS Eratta, ATTACHMENT E-I will be located after RESOURCE APPENDIX K - SOILS).

Approximately 48 acres proposed for harvesting meet the Green et al definition for old-growth.

3. As indicated in your letter, you believe true, real, and/or potential old-growth stands are the ones that meet the Technical Review Team's recommendations. Approximately 48 acres are within proposed harvest areas and would meet that definition. Approximately 19 acres display high amounts of western larch mistletoe infection and associated mortality. These 19 acres are along an open road where snags and down woody material are minimal due to firewood gathering. The other 29 acres are behind a restricted gate and the ID Team did not identify this unit as meeting the desired tree species mix in relation to seral trees.

growth acres as DNRC's commitment under the 1996 state forest plan. In fact, a great portion of these so-called old growth stands have been heavily highgraded by past overstory logging, primarily of dominant, shade-intolerant species, as discussed in appendix E.3. Most of these stands would not meet any credible definition of old growth, including the definition in the 1996 SFLMP glossary.

3 I don't believe that "white pine cover type" is a meaningful forest classification category in the Stillwater State Forest.

4 The analysis does not provide an adequate indication of the amount of "true" or real old growth that might be included in the proposed harvest. Of particular importance is the number of large diameter trees, an indicator which is missing from the analysis. I note that 58 acres are classified as "high attribute old growth," and I believe at least some of this would meet the Green minimums based upon my ski-by review of Unit 13. However, the FOGI index is of limited use in evaluating the presence of true old growth. As the Technical Review Team submitted, the FOGI Index does not adequately weight the importance of large, old trees.

4 I urge you to refrain from logging in potential old-growth stands that might appropriately be included in a future old-growth retention network. Without additional information, I don't know which stands those might be. Fortunately, recent developments provide DNRC the time and flexibility to proceed cautiously on this front. Rather than push forward with a ROD in the next few months in violation of the TRT recommendation, I urge DNRC to proceed immediately with a process to design the old-growth retention networks in conformity with the TRT recommendations.

5 As we discussed yesterday, I believe recent fire salvage on the Sula State forest and elsewhere must be counted toward the annual sale target, as salvage volume in the past has been counted toward that target. The areas burned in 2000 were programmed for future logging to meet future cut targets; since the fire has eliminated that option for many decades and large volumes are being salvaged now, other areas will be required to pick up the burden in the future. That means the programmed cut in other areas should be reduced now while the Sula contributes more than expected to timber targets now. If DNRC exceeds sustained yield now, it will either be constrained from meeting it later or will exceed the long-term sustained yield. In addition, I believe it would be especially imprudent from a fiduciary perspective to exceed the sustained yield target this year by selling regular programmed volumes of green timber on top of a large salvage volume sold into one of the weakest timber markets in recent memory.

6 I'm copying this to Tom Schultz with the request that DNRC immediately revise downward the Northwest Field Office's fiscal year volume commitment, which currently is 23 MMBF.

6 Independent of the old growth issue, I have a couple additional comments on the DEIS. I believe a hybrid approach should be taken to the various units described in Alternatives B and C. The stands are different in this area. Seedtree or group selection clearcuts described in Alt. B may be appropriate in areas where you don't have much to work with. In other areas, where you have more options, a shelterwood approach should be preferred. Under the shelterwood approach, however, uniform spacing seems too simple. In some places, clumping might be preferred. In general the marking of each unit should emphasize leaving the best trees on site, reflecting the best seed sources as well as habitat attributes and diverse structure. Where you have more good trees to work with, more trees should be left on site.

Information on large-diameter trees for the project area is listed in TABLE F-7a of the Eratta.

4. Dependent upon the criteria that a potential old-growth network or reserve is developed, these portions of stands that are proposed for harvesting may or may not fit in a network scheme. The proposed prescriptions for these stands do emulate natural processes for these forest types.

We recommend that the Land Board continue to evaluate and approve timber sale projects that have been developed under the 1998 Biodiversity Guidance on a case-by-case basis, while the new old-growth guidance is being implemented and old-growth reserves are being identified. On all projects since the SFLMP became effective, the Department has evaluated the impacts to old growth. This project-level evaluation will continue, thereby ensuring that impacts to old growth continue to be fully disclosed. A component of project-level analysis always includes evaluation of landscape-level impacts, further ensuring that the stands that might be included in old growth reserves are evaluated for landscape-level contributions to biodiversity.

5. Your input has been reviewed by the decisionmaker and may be considered in either the Proposed Decision section of this FEIS, a Decision Memo, or in the Record of Decision.

6. Your input in relation to harvest prescriptions, the Smith Lake area, and cumulative impacts have been reviewed by the decisionmaker and may be considered in either the Proposed Decision section of this FEIS, a Decision Memo, or in the

From a recreation perspective, I have used my Recreational Use Permit to enjoy berry picking, fishing, upland bird hunting, hiking and cross-country skiing in the project area. In general, I support more non-motorized access in these areas and less open roads, including in the Smith Lake area.

Finally, I want to register my concern about cumulative watershed impacts. As you know, the SFLMP provides for a low risk threshold for Whitefish Lake. According to your analysis, this project and the cumulative impact of others will not exceed that threshold. I have no specific reason to believe this is not true. However, given the proximity of this project to Swift Creek and considering the numerous other recent or ongoing logging projects by the state and Plum Creek, as well as the hideous clearing by the private landowner north of Hell Roaring Creek, I urge particular caution to protect water quality in Whitefish Lake.

Thank you for considering my comments.

Sincerely,



Steve Thompson

cc: Tom Schultz

1. The sentence from the Executive Summary about the sale producing long-term income may oversimplify DNRC's philosophy and standards in relation to the SFLMP. Page I-1 of the DEIS further states: "Our premise is that the best way to produce long-term income for the trust is to manage intensively for healthy and biologically diverse forests..." If you do not have a copy of the full DEIS with its Resource Appendices, the Whitefish Library has a copy, or refer to www.dnrc.state.mt.us.
2. The noxious weed situation for the Taylor South area was inventoried and analyzed. As shown in APPENDIX B-STIPULATIONS AND SPECIFICATIONS, the Timber Sale Contract would ensure that standard mitigations would be applied to address further introductions of weed species. In cooperation with the Flathead County Weed Department, seasonal herbicide spot treatments, specifically targeting individual plants, have taken place since 1998 and will likely continue.  
Native plant seed is within the seed mixes used to revegetate disturbed areas. The use of complete native seed mixes is also being considered by the Department, although the amount of available seed is limited and costly. Native mixes have been used in the past on specific locations on Stillwater State Forest.
3. For the number of trees to be left by each alternative, refer to ALTERNATIVE DESCRIPTIONS in CHAPTER II of the DEIS. For an approximation of larger diameter trees to be retained to meet snag retention and recruitment guidance, see APPENDIX B - STIPULATIONS AND SPECIFICATIONS, page B-3, or the response to the Adams letter in regard to large-diameter trees.

RECEIVED

To: Mike McMahon  
Stillwater State Forest  
PO 164 Olney MT.

Mr. Malcolm Thompson  
PO Box 1105  
Columbia Falls MT 59912-1105

Jan 17, 2000

Re: Taylor South Timber Sale Project - DEIS EA Summary

- 1 on p. 1 - "would produce long-term income for 'Scheduled Trust'" If this refers to the yrs logging occurs (about 3 yrs) this seems to me to be a misleading way to make this statement.
- 2 pg 2 on list of resource concerns - Vegetation is qualified as (trees) are there not concerns for other types of plants. "Much of the area has prior clearings and roads with a disturbing weed invasion. In the on other sales, there have been weeds to the problem, but not much resources also the use or overuse of non native be detrimental what about non native pg 3? 5 • Vegetation what about non native would be left? AITB (pg 4) Most would 3 The map on pg 5 plainly marks the proposed harvest units in the area It does not show their relationship units - some, where nothing was left extra snags and recruits be left to compensate for such clearings? 4 an overall concern I have is the changing concept of what is Tainable. The conversion of old to young, fast growing and 'healthy'

Trees recruit environment - To past will now about 545- stands ones

was the acceptable norm for many people for much of the past. 100 yr cycles looked good on paper and worked? in other climates. Now we are facing our reality, we can't replace two or three hundred yr old trees (no) forests in one hundred yrs. I don't know. maybe we/I need to take a break and see if this working.

Malcolm  
Thompson

4. The map in APPENDIX F - WILDLIFE, page F-25, displays the 100+-year-old stands; the remaining stands are a combination of new harvest units (currently regenerating) and stands in the 40- to-100-year age class. Approximately 4 percent of the project area has trees in the 0-to-40-year age class.

Of the areas harvested in the project area during the 1990s (the Lazy Swift and Werner/Taylor timber sales), the number of trees recommended for snag retention and snag recruitment was met.

5. DNRC's Sustained Yield Study assumes some stands will be left unharvested beyond the 100-year age class. The study also does not put all of DNRC's timber base on a 100-year rotation for harvesting.

406 721 3589

106-01 THU 05:12 PM MT ENV INFO CENTER

Jennifer Ferenstein  
Montana Environmental Information Center  
114 West Pine  
Missoula, MT 59802  
(406) 721-3586

Sent via Easymile (406) 881-2372 and mail

January 18, 2001

Bob Sandaman, Unit Manager  
Stillwater State Forest  
P.O. Box 164  
Olney, MT 59927

RE: Taylor South Timber Sale Project

Dear Mr. Sandaman,

I thank you for the opportunity to comment on the Taylor South Timber Sale. We are especially interested in this project in light of the Scientific Technical Review that was recently completed for the state and the recommendations that it spells out regarding old growth management.

I haven't had the chance to review the Taylor South DEIS in depth but I do want to raise a concern with the proposal because of its impact upon old growth. MEIC strongly urges the DNRC to not move any timber sales in old growth forward until clearly articulated procedures are in place that are consistent with the Scientific Technical Review.

If you do decide to continue with this proposal, we request that your final EIS reflect the findings of the scientific review and that your preferred alternative reflect the recommendations accepted by the Land Board.

Given the shaky timber markets and the large volume of salvage that the state is currently harvesting in the Sula State Forest and elsewhere we see no reason to proceed with this sale until several important policy issues are resolved.

I thank you for considering my comments.

Sincerely,



Jennifer Ferenstein

1. DNRC has updated Land Board members and their staff on the results of the Technical Review Team (attachment E-IA, INFORMATION ITEMS - STATE LAND BOARD MEETING, OLD GROWTH GUIDANCE ON SCHOOL TRUST LANDS, UPDATE ON TECHNICAL REVIEW TEAM REPORT, 12-18-00) and is currently drafting the final old-growth guidance, determining an interim strategy for existing sales with old-growth, and developing a process for delineating old-growth reserves.

This information was presented for Land Board approval at the February 2001 Land Board meeting. The Green et al criteria was selected by the Land Board to define old growth. Where the SLI information does not provide a link with the Green definitions, the "Option 2" old-growth definitions would be used. "Option 2" definitions were provided to the public and the Technical Review Team in August 2000 for their review. Other items listed in Attachment E-Ia, the "Information List", were tabled until the April 2001 Land Board meeting. Primarily these include how much old growth should be retained; this would help identify a process for delineating old-growth networks or reserves.

For additional information please refer to the FEIS Errata, ATTACHMENT E-I - OVERVIEW OF OLD-GROWTH MANAGEMENT ON TRUST LANDS, E-Ia - INFORMATION ITEMS - STATE LAND BOARD MEETING, OLD GROWTH GUIDANCE ON SCHOOL TRUST LANDS, UPDATE ON TECHNICAL REVIEW TEAM REPORT, 12-18-00, and FIGURE E-Ia - OLD-GROWTH STANDS USING GREEN ET AL DEFINITIONS. (Within this FEIS Errata, Attachment E-I will be located after RESOURCE APPENDIX K - SOILS.)

TALLY LAKE RANGER DISTRICT  
(KOLLMEYER)

1. According to DFWP fisheries biologists, hybrid cutthroat trout have been found in the Swift Creek watershed. Genetic work within the Swift Creek watershed has been completed on Antice and Johnson creeks. This data showed pure westslope cutthroat. No genetic makeup has been completed on King, Bear, Trail, Hemlock, or Taylor creeks, which contain small disjunct resident populations. Redd counts for cutthroat spawning during 1993 showed no redds in Taylor or Anchor Creeks; however, 1995 counts resulted in 6 and 9 redds, respectively.
2. It is suspected that 2 separate populations of bull trout exist in the Swift Creek drainage. One that migrates from Whitefish Lake to spawn in the West Fork of Swift Creek and a second that migrates up the East Fork of Swift Creek from Upper Whitefish Lake. Swift Creek within the project area is mainly considered to be a migratory stream, although some rearing does occur.
3. According to the DFWP fisheries biologists, threats to bull trout in the Swift Creek watershed include a changing species composition in Whitefish Lake, which results in a higher predation on bull trout, as well as competition for food sources. Another potential threat to bull trout is land disturbance in the West Fork of Swift Creek. The Upper Whitefish Lake population is challenged by intermittent portions of the East Fork of Swift Creek above the lake. Spawning surveys were conducted in the West Fork of Swift Creek; these spawning areas would not be affected by the Taylor South Timber Sale Project and, therefore, was not included in the analysis as described on page D-2 of the analysis. Rearing habitat information has not been collected on the main stem of Swift

United States  
Department of  
Agriculture

Forest  
Service

Tally Lake  
Ranger District  
(406) 863-5400  
Fax (406) 863-5437

File Code: 1950

Date: January 18, 2001

Mike McMahon  
Project Leader  
Stillwater State Forest  
PO Box 164  
Olney, MT 59927

Dear Mike,

Thank you for the opportunity to comment on the Taylor South Timber Sale Project. The Tally Lake fish biologist, Beth Gardner, had several questions and concerns regarding the fisheries analysis (Appendix D).

1 The existing condition section disclosed the presence of bull trout and westslope cutthroat trout in the watershed but we could find no information about the status of these populations. Are the cutthroat trout genetically pure westslope cutthroat trout? Is the population robust or does it consist of a few stray individuals? Are King, Bear, Trail, Hemlock, and Taylor Creeks spawning streams for the Swift Creek "metapopulation" or are they small disjunct populations in themselves? Are there exotic species also present in these tributaries? What are the risks or threats to the westslope cutthroat trout population? What is the condition of fish habitat?

2 Even though no bull trout redds have been found in Swift Creek, the DEIS discloses bull trout are present. We believe disclosing if Swift Creek is a migratory stream or was it once a rearing stream is important. Although it is not disclosed in the DEIS, Beth is aware that the bull trout population of Swift Creek is considered depressed. What are the threats to bull trout? Page 1 of Appendix D does mention the role of exotic species in other water bodies but then points out the role of spawning and rearing habitat quality. What is the condition of spawning and rearing habitat in the Swift Creek watershed?

3 Beth was also concerned with how the environmental effects were analyzed in the fisheries section. The analysis seems to only rely on the net effect of water yields in lower Swift Creek. How will you consider the more localized effects on other portions of the watershed. An example would be to disclose the effect to just Taylor Creek. Could the timber removal in this small watershed negatively impact a small resident cutthroat population or a spawning stream to a "metapopulation?"

4 We were impressed with the formatting of your documents into a reader-friendly EIS and an appendix section with the more technical specialist's reports. The use of photography was especially helpful.

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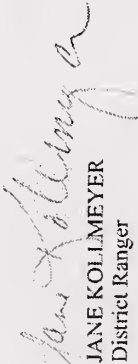
TALLY LAKE RANGER DISTRICT  
(KOLLMEYER)

Creek at this time.

4. As stated on page D-3 of the Resource Appendices, the hydrology analysis is used as a base for the fisheries analysis. By using a low degree of risk in the SFLMP Resource Management Standard (RMS) 7 to set the threshold of concern for annual water yield in the watershed, the potential for increased sedimentation in the streams and damaging fish habitat is limited. In addition, the extended SMZs recommended by SFLMP Watershed RMS 10 will provide for adequate filtration of runoff. Since no harvest in the SMZ of named streams is associated with this project, recruitable large woody debris would not diminish as a result of the project.

If you would like to discuss these concerns and questions with my resource specialists, please do not hesitate to contact us at the Tally Lake Ranger Station. Thank you again for the opportunity to comment.

Sincerely,

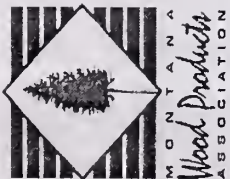


JANE KOLLMEYER  
District Ranger



MONTANA WOOD PRODUCTS ASSOCIATION  
(HEGREBERG)

Comments received and considered.



January 18, 2001

Bob Sandman  
Stillwater State Forest  
P.O. Box 164  
Olney, MT 59927

Dear Bob:

I am writing on behalf of the Montana Wood Products Association in support of the Taylor South timber sale proposal. The draft EIS is thorough and easy to follow.

A bill has been introduced in the Montana legislature to amend MEPA to require a meaningful analysis of "no action alternatives" and of the positive implications of various alternatives. The Taylor South project is an example of where such analysis would be useful.

We concur with Ron Buenteimer's concern about your statement on page G-9 that there would be "no change to the area's economy..." under the no-action alternative. "No action" translates to an opportunity cost that may well mean a job loss. You are undoubtedly aware of the severe stress on area sawmills as a result of the virtual meltdown of the federal timber program.

Overall, we favor alternative C because it results in the optimum return to the trust beneficiaries.

Thank you for the opportunity to comment.

Sincerely,

*Cary Hegreberg*  
Cary Hegreberg  
Executive Vice President

New address: 2027 - 11th Avenue Helena, MT 59601

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1. In the Surface Water Quality of the Stillwater State Forest and Swan River State Forest, 1976-1983, Bill Schultz (then Department of State Lands hydrologist) showed that sediment at the lower gaging station on Swift Creek was "significantly higher at the 95 percent confidence interval than all stations on the Stillwater...the annual total suspended solids (TSS) yield is 190 tons per square mile, 8 times that of the Concrete Bridge station (11 miles upstream) and 13 times the yield of the West Fork. The principal source of this sediment is high (200 feet), steep, erosive, and largely unvegetated channel banks composed of glacial outwash material that is eroded by rainstorms and is continually raveling and slumping into the creek...."

This area was the source for approximately 87 percent of the total annual sediment yield in Swift Creek.

In 1984, Mr. Schultz measured the physical characteristics of the banks and authored a report to the Whitefish Basin Project and concluded, "The sediment originating in the lower reaches of Swift Creek is largely derived from the glacio-fluvial banks. This is primarily a natural occurrence that will continue until a natural angle of repose is met, a function of geologic time."

The Flathead Basin Commission Biennial Reports in 1992, 1994, 1996, and 1998 concur with Mr. Schultz's findings.

2. This question was answered on page I-1 of the DEIS.

3. The Taylor South Project was designed to meet

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1/15/07



**Alliance for the Wild Rockies**  
PO Box 8231 • Missoula, Montana • 59807  
Ph: 406-721-5410 • Fax: 406-721-9917

Mr. Robert Sandhu  
Stillwater State Forest  
PO Box 164  
Clancy, MT 59927

Dear Robert:

These are comments in regards to the DNRC Taylor South Timber Sale on the Stillwater State Forest on behalf of the Alliance for the Wild Rockies (AWR). AWR can not support forest management that is inconsistent with activities principles, state and federal law, and resource protection. As such, we find it impossible to support the construction of temporary spur roads and the clear-cutting of forests proposed in alternatives B and C of this proposal.

**General Discussion**  
We understand the states' perceived obligation to cut forests down, however in this case we feel that the environmental consequences of either action alternative are far too great. It seems as though it would be difficult to find a more environmentally sensitive area to conduct large-scale logging operations. The Taylor South project area supports a Water Quality Limited Stream, five federally protected animal species, five sensitive animal species, and apparently, some degree of functional old growth habitat (the FIS did not mention the presence or lack thereof of protected or sensitive plant species). Each of these characteristics is afforded certain protections by state and federal law. A review of the Draft Environmental Impact Statement failed to persuade AWR that the DNRC can meet the requirements of these legal mandates while clear-cutting or shelterwood thinning up to 4-6 MMBF of forest. So while MCA 77-1-202 (DNRC's justification for logging is clearly the DNRC ranking legal guidance, we refer you to an often-overlooked Montana constitutional mandate. The Montana Constitution requires that "the state...shall maintain and improve a clean and healthful environment in Montana for present and future generations." (Article IX, Section D). The following comments will also reference other state and federal regulations this project is in conflict with.

**Water Quality and Fisheries**  
No where is the above constitutional requirement more pertinent to this project than as it relates to water quality. As an organization made up of citizens and businesses that value clean and fully functioning watersheds we request that any state action only improve the water quality of Swift Creek. As you know, the 1996 WQLS report listed the aquatic life support and cold water fishery as the limited uses on Swift Creek. Sedimentation as a result of logging, road building, and road use is the primary cause of impairment in Swift Creek. Sedimentation as a result of logging, road building, and road use to the geologic make-up of Swift Creek (DEIS III.2). Since the DEIS attributes the 'majority' of this sedimentation Creek, the 1996 list of waterbodies in need of TMDLs made no mention of chip banks; it did however specifically indicate silvicultural practices. It is our position that DNRC, as one of the agencies responsible for protecting natural resources (WQLS), should not carry out any activity that will further impact an already damaged stream. Without even considering ongoing and future projects in the Swift Creek drainage, DNRC will be furthering impairment to Swift Creek with the Taylor South project. Until a TMDL is developed for Swift Creek the DNRC should only carry out prescriptions that directly improve water quality by decreasing sedimentation. AWR contends that as DNRC continues to create higher runoff and higher sediment delivery through silviculture practices a true TMDL, based on 'naturally occurring levels will never be possible. What is preventing the DNRC from deferring all logging in the Swift Creek drainage until a TMDL has been completed?

3 Please respond by detailing how DNRC caused increased runoff will be in compliance with each of the legal requirements of the Clean Water Act and the Endangered Species Act. Further, please detail how any potential DNRC caused increase in sediment delivery would be in compliance with these legal requirements. In addition, we request that you discuss the state's antidegradation policy and whether the proposed project meets the antidegradation requirements. In sum, until TMDLs are completed for Swift Creek the DNRC is not allowed to increase additions of pollution, even temporarily. Please explain why the DNRC has several times in this DEIS (p. C-2, p. 1-4) made possible prescriptions that will increase flow and possibly increase sedimentation in a WQLS that supports the threatened Bull-Tout.

4  
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- 5 Is the DNRC contention that water yield can increase without a resulting sedimentation increase? Page III-2 of the DEIS throws out the number of 8% being the necessary water yield increase above "naturally occurring" levels to increase sedimentation. AWR requests the method or model used to come up with the 8% increase necessary. Has this method or model proved to be accurate in the past? Does the 6.3% projected water yield increase (DEIS III-3) include sediment earned into Swift Creek from increased overland flow?
- 6 Page 1-4 of the DEIS discloses that a short-term Exemption from Montana's surface Water Quality Standards (3A Authorization) may be necessary. For what watershed would this permit apply to? It would be a mistake to pursue such a permit for Swift Creek.
- 7 AWR has questions regarding the cumulative effects on hydrology in the project area. Page III-3 of the DEIS discloses that water yield for the lower Swift Creek watershed would increase as a result of the Taylor South and Chicken Werner projects. Since the DEIS does not disclose where the future beagle salvage project will be we are left wondering if it too will have effects on water yield for the lower Swift Creek drainage? Please disclose the exact location of these beagle salvage areas and if they will affect the Swift Creek drainage. It is neither clear if all projects in the area (non-DNRC included) are part of the projected or cumulative ECA calculation.
- 8 The DEIS cites House Bill 546 (MDE law, DEIS C-2), while this Bill certainly applies to Swift Creek we are under the impression that DNRC has misrepresented the intent and language of the Bill. The following phrase, "may further the listed impairment", is in the DEIS but we could not find such language in the in the Bill itself. If we have overlooked this language in HB 546, please correct us with a specific cite. Obviously, such an addition on your part or an oversight on our part would be significant.
- 9 As the DNRC must know, the risk of extinction for the threatened Bull Trout at the regional level is rated as high. This in mind we would expect that the DNRC would do everything in it's power to facilitate a recovery. While the Alliance recognizes the road improvements associated with this project, we also recognize the logging, spur road construction, and high level of road use associated with the Taylor South project. AWR would ask that when DNRC is considering activities in a WQIS that supports Bull Trout and Westslope Cutthroat Trout that all activities be designed to only improve water quality. The Alliance can not imagine a stream that deserves a higher level of protection, yet the prescriptions associated Taylor South are no different from those in any other watershed DNRC logs in. Please comment on how DNRC regards management in such a sensitive stream and further, how this translates into on the ground consideration.
- 10 Regardless of what the Alliance for the Wild Rockies would prefer, the Clean Water Act and the Endangered Species Act mandate such project design. We ask the Department of Natural Resources and Conservation how a project that proposes the same actions that put the Bull Trout on the Endangered Species list can now protect this species? Again, we recognize the road improvement work associated with this project, but please detail how the logging prescriptions, spur road construction, and road use result in improved water quality and improved Bull Trout habitat.
- 11 The cumulative effects on fisheries only lists the effects of road improvement associated with this project. Of course this ignores all other past and reasonably foreseeable projects in the area (state, federal, private). For instance, how will the future beagle salvage project contribute to the CUMULATIVE effects in the project area? How will reasonably foreseeable federal and private projects contribute to the CUMULATIVE effects in the project area? Does the DNRC believe that all of these projects combined will result in the same effects that the road improvement associated with the Taylor South project will result in? Is DNRC planning on moving forward with formal/informal consultation with USFWS in regards to Bull Trout?

Other Endangered Protected Species

Grizzly Bear

- 12 The direct effects to Grizzly bears (DEIS F-12) does not list the direct effects to grizzly bears. It is not enough to simply list all of the issues, positive or negative, on this project presents. What is important, and the intention of MEPA and the ECA, is that the actual effects of these issues on the ability of bears to recover are disclosed. We ask Jay Shepard, the DNRC ID Team biologist, what does decreased hiding cover, use of restricted roads, increased disturbance to resident bears, short-term increases in ORD, increased use of roads, and increased human use of the project area mean for the

all State and Federal regulatory requirements. By meeting State water-quality standards (described in Appendix C-Hydrology, page C-2), DNRC is, essentially, meeting all legal requirements of the Clean Water Act.

DNRC has consulted with a DFWP fisheries biologist to limit the potential for impacts to bull trout. By implementing BMPs and restricting timing on activities in bull trout waterbodies, the potential for adversely affecting bull trout is unlikely.

The State's nondegradation policy can be found in 75-5-303 of Montana Codes Annotated (MCA). According to 75-5-317 (2) (b), MCA, nonpoint source activities that are initiated after April 29, 1993 are considered nonsignificant activities and, thus, are not subject to the provision of 75-5-303, MCA, provided that reasonable land, soil, and water conservation practices are applied and existing and anticipated beneficial uses are fully protected. Activities that are not exempted under 75-5-317, MCA, would be reviewed and permitted for a short-term exemption under 75-5-318, MCA, prior to implementation.

4. This comment was answered in the DEIS APPENDIX C-HYDROLOGY, pages C-5 and C-6.
5. Please refer to APPENDIX C-HYDROLOGY, pages C-5 and C-6 in the DEIS and SFLMP WATERSHED RMS 7 for information regarding methods used to set annual water-yield thresholds. The projected 6.3 percent cumulative water-yield increase takes into account past and present activities from all ownerships in the Swift Creek watershed and all future planned actions on State land

13 bears that use the state forest land? Cumulatively, how do the impacts of this project contribute to impacts from past and reasonably foreseeable projects in the area and most importantly, WHAT DOES THIS MEAN FOR THE VIABILITY AND RECOVERY OF THE GRIZZLY BEAR? Is DNRC planning on moving forward with formal/informal consultation with USFWS in regards to Grizzly Bear?

14 Lynx  
The Taylor South action alternatives will reduce lynx security and increase the potential for direct human-caused mortality of lynx (DEIS p F-18). Please explain how a project that will reduce security and increase the potential for direct human-caused mortality of lynx complies with the Endangered Species Act.

15 Please clarify the following disclosure in the DEIS: "The application of the following mitigation's would significantly enhance the ability of lynx to use the project area" (DEIS F-18). Would decreased security and an increased potential for direct human-caused mortality still be the net result of an action alternative, even in consideration of planned mitigation? Or does the above sentence imply that the net result of this project is an enhanced Lynx habitat?

16 How has DNRC identified Lynx habitat and all corridors within the project area? We would like to see a map of lynx habitat and corridors in relation to logging units as a part of the next analysis step for this project. This would go a long way to ensuring public confidence that the DNRC has done what is necessary to protect lynx. Is DNRC planning on moving forward with formal/informal consultation with the USFWS in regards to Lynx?

17 Plant Species  
Has the DNRC made an attempt to identify and protect any plant species currently protected by the ESA?

18 Old Growth  
DNRC should not be planning timber sales in old-growth forest habitat until it has completed its old growth definition, identification, and mapping process. The technical review committee made several recommendations that are not referenced or contained in this DEIS. Recommendations include: using the Green et al definitions to determine old-growth, decide how much old-growth will be put in reserves, identify the reserves on a map, identify replacement old-growth, and in the meantime stay out of old growth. The Taylor South EIS is using the definition and full old growth index that was found to be inadequate. Please explain how (or if) DNRC intends to comply with the technical review committee's recommendations. AWR requests that DNRC disclose how much of the forest in the project area is meeting the minimum criteria as defined by Green et al? Further, how much of this habitat will be logged in association with an action alternative? How will the prescriptions that cut old growth restore or maintain old growth characteristics?

19 Please explain why DNRC wants to log 150+ year old ponderosa pine stands when ponderosa pine is one of the most fire resistant trees and comprises only 1% of the Stillwater State Forest. Please disclose whether western red cedar is lumped in with mixed conifer. If so, how much western red cedar will be logged? Are they in any of the eight identified old growth stands?

20 Economics  
Please disclose the expected stumpage price to be collected for each tree species sold in association with the action alternatives. Additionally, explain how this projection was formulated and whether or not it accounts for the current timber market realities.

21 Thank you for reviewing our comments.

Sincerely,

Ryan Shaffer  
AWR

with the watershed. In order to provide adequate filtration to overland flow, SMZ width for each stream was set using SFLMP WATERSHED RMS 10.

6. The 3A Authorization (now referred to as a 318 Authorization) may be required for replacing the culverts referred to in the EIS as well as the bridge replacement on the East Fork of Swift Creek.

7. The concentration of beetle-infested trees described in APPENDIX E-VEGETATION, page E-10, is within the Lower Swift drainage. It has been recommended that these types of infestations be harvested, yet, at this time, this minor infestation has not been proposed to be harvested. Recommendation has been to restrict salvage in old-growth unless the situation meets the DNRC Old-Growth Working Group's criteria for salvage harvesting in old-growth stands (January 1999).

Cumulative impacts as defined in 36.2.522 of the Administrative Rules of Montana (ARM) were taken into account.

8. The language found in the EIS paraphrases 75-5-703(10)(c) MCA, which reads as follows, "(c) new or expanded nonpoint source activities affecting a listed water body may commence and continue provided those activities are conducted in accordance with reasonable land, soil, and water conservation practices;"

9. Swift Creek and its tributaries are managed according to the SFLMP Watershed Resource Management Standards (RMS). The RMS and subsequent implementation guidance describes the on-the-ground management considerations taken

into account.

10. The project is designed to be in accordance with all pertinent laws and regulations. By implementing BMPs (RMS 4), following the SMZ Law, and implementing extended SMZs (RMS 10), managing annual water-yield increases below the recommended threshold of concern (RMS 7), and monitoring the effectiveness of our mitigations (RMS 18 thru 24), DNRC will remain in accordance with RMS 1 and maintain high water quality. In addition, SFLMP Fisheries Resource Management Standards would be implemented to protect bull trout habitat.

11. In *APPENDIX D-FISHERIES*, page D-2, the 'Existing Condition' portion is a result of past management in the project area and in the Swift Creek drainage, including the data collected regarding spawning habitat in the Swift Creek drainage by DFWP. Cumulative impacts as defined in 36.2.522 ARM were taken into account as part of the fisheries analysis.

The concentration of beetle-infested trees described in *APPENDIX E-VEGETATION*, page E-10, is within the Lower Swift drainage. Recommendation has been made that these types of infestations be harvested, yet, at this time, this minor infestation has not been proposed for harvesting. Recommendation has been to restrict salvage in old-growth unless the situation meets the DNRC Old-Growth Working Group's criteria for salvage harvesting in old-growth stands (January 1999).

DNRC has no avenue for formal/informal consultation with the USFWS; however, DNRC coordinates with DFWP for all projects that

might affect fishery resources in accordance with SFLMP Fisheries RMS 1.

12. The DEIS lists direct effects to grizzly bears with respect to amounts of seasonal and security habitat, as well as other management thresholds (*DEIS APPENDIX F-WILDLIFE, pages F-12 to F-14*). Following grizzly bear management guidelines and adhering to the mitigations listed in the DEIS will limit possible effects by decreasing their intensity and controlling their timing (*DEIS APPENDIX F-WILDLIFE, pages F-13 to F-14*).

Harvesting activity is restricted to seasons of probable low use by grizzly bears within the proposed project area, management guidelines (*DEIS APPENDIX F-WILDLIFE, pages F-13 to F-14*) are being followed, and mitigations are being applied, thus, the effects to grizzly bears are expected to be low, although the possibility of human-bear interaction or human disturbance may not be eliminated. Grizzly bear use of the proposed project area may continue during harvesting and certainly will continue after the completion of timber-harvesting activity.

13. The viability of grizzly bears is beyond the scope of the project area and the DEIS. Recovery efforts with respect to threatened and endangered species apply to Federal land, while State and private entities are prohibited from "take", which includes significant modifications to habitat that results in "actual injury or death" to individuals. While DNRC has the responsibility to minimize the risk of "take" while conducting management activities, the USFWS is the agency charged with determining when "take" occurs. DNRC believes that adhering

to the current guidance is sufficient to meet the SFLMP standards and avoid "take" of grizzly bears or their habitat. The proposed project was designed to use existing roads, or use restricted roads during the seasons of least disturbance to grizzly bears, and have no long-term increase in road density.

14. DNRC is not required to formally consult with USFWS with respect to grizzly bear habitat modification. Informal consultation occurs, although not always on a project-by-project basis.
15. Lynx and their prey use a variety of vegetation age classes and habitat types. Temporary reductions in security cover occur from natural and human-caused disturbances. Lynx have adapted to natural-disturbance events, although it is incumbent upon DNRC to acknowledge the effect of reduced security cover caused by timber harvesting. Timber harvesting may possibly increase the vulnerability of lynx to human-caused mortality and natural predators. The stated mitigations would reduce the probability of these events and the effects of the proposed project to lynx.
16. The sentence.. "The application of the following mitigation's would significantly enhance the ability of lynx to use the project area." is admittedly confusing. This was meant to imply that following timber harvesting, the ability of lynx to use the project area would be enhanced with the mitigations applied in comparison with no mitigations applied. It was not meant to imply the application of mitigations would

- enhance the ability of lynx to use the postharvest project area over their ability to use existing conditions.
17. A specific map of lynx habitat was not produced for this analysis. Corridors of 330 feet between harvest units occur on perennial streams (except for a small portion of Vars Creek where they are narrower; see *DEIS APPENDIX F-WILDLIFE*, page F-18). For a map of mature to old stands, proposed harvest units, and corridors, see *DEIS, APPENDIX F-WILDLIFE*, page F-25.
18. DNRC is not required to formally consult with USFWS with respect to lynx habitat modification. Informal consultation occurs, although not always on a project-by-project basis.
19. DNRC contracted a botanist to complete a Level 5 intuitive survey of the project area for plants listed in the Montana Plant Species of Special Concern, as well as endangered plant species. There are no endangered plant species within the project area. Several populations of Buckler fern (*Dryopteris cristata*) and Spurred gentian (*Halenia deflexa*) have been located in the project area, and potential habitat for Kidney-leaved white violet (*Viola renifolia*) has been located. No timber harvesting is proposed within the areas where these species or habitats have been located.
20. For this project, DNRC will use the phased-in approach to implementing new guidance (*DNRC 1996:ROD-10*). Projects that have gone through the MEPA public-scoping process will not require that every element of new old-growth guidance be implemented. We have recommended that the Land Board continue to evaluate and approve timber



sale projects that have been developed under the 1998 Biodiversity Guidance on a case-by-case basis, while the new old-growth guidance is being implemented and old-growth reserves are being identified.

DNRC has updated Land Board members and their staff on the results of the Technical Review Team (FEIS ERRATA, ATTACHMENT E-Ia-INFORMATION ITEMS - STATE LAND BOARD MEETING, OLD GROWTH GUIDANCE ON SCHOOL TRUST LANDS, UPDATE ON TECHNICAL REVIEW TEAM REPORT, 12-18-00) and is currently drafting updated old-growth guidance, determining an interim strategy for existing sales with old-growth, and developing a process for delineating old-growth reserves.

21. For more information, please refer to FEIS ERRATA, ATTACHMENT E-I-OVERVIEW OF OLD-GROWTH MANAGEMENT ON TRUST LANDS including FIGURE E-Ia - OLD GROWTH STANDS USING GREEN ET AL DEFINITIONS.
22. In relation to DNRC's 1998 working definition, Action Alternative B would not maintain many old-growth characteristics within the harvest units, and Action Alternative C would maintain low levels of old-growth attributes within the harvest units (E-21 and E-22, APPENDIX E-VEGETATION, pages E-21 and E-22).
23. Please refer to errata and Friends of the Wild Swan letter.
24. Please refer to responses to Friends of the Wild Swan letter.
25. The stumpage prices used in APPENDIX G-ECONOMICS, TABLE G-5-COSTS AND BENEFITS ASSOCIATED WITH THIS PROJECT BY ALTERNATIVE,

page G-5, were calculated from the Transaction Evidence Equation in May 2000. Updated calculations from January 2001 have been included in the Errata. Stumpage rates per mbf by species range from \$119.46 to \$131.08 for white woods and \$145.81 to 149.90 for Douglas-fir and western larch. These rates do not include the road development costs of \$60 to \$64 per thousand board feet (mbf) or the forest improvement (FI) fees of \$52 per mbf.

26. The State uses a Transaction Evidence equation to set the winning bid. This system uses a multivariate regression equation to predict the winning bid value for a timber sale based on the sale's characteristics and the past and current market data. A major assumption of this method is that the past is a good predictor of the present and future. With the recent trends in bid values decreasing, the stumpage estimates displayed in the Errata do account for the realities of the current timber market.

1. The disclaimer about Dave Remington's paper is presented as background information. In addition to your statement, Action Alternative B estimates that 333 acres of the 341 acres proposed for harvesting would no longer meet DNRC's current old-growth definition, see *DEIS Resource Appendix E-Vegetation*, page E-21.
2. The 1998 Biodiversity Guidance does not suggest, or require, using the Full Old-Growth Index (FOGI) method of identifying high, medium, or low attribute stands. The DEIS provided information on old-growth attributes within this project area because we happen to have a nearly complete inventory in relation to the FOGI classifications. The FOGI information does not exist for the entire Stillwater State Forest. As stated in *APPENDIX E-VEGETATION*, page E-19, "Approximately 1/3 of the acres on Stillwater Unit has an updated stand level inventory (SLI) database that can access these attribute levels. Guidelines that utilize this information at a landscape level have not been developed by DNRC at this time."
3. A general landscape analysis of pileated woodpecker habitat using stand age and canopy closure levels was conducted, indicating that large amounts (around 3,900 acres) of potential habitat occurs within the proposed project area; approximately 85 percent of that would be retained postharvest. Stand age and canopy-

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Bob Sandman, Unit Manager  
Stillwater State Forest  
P.O. Box 164  
Olney, MT 59927

Dear Bob,

January 22, 2001

Thank you for accepting these comments on the Taylor South timber sale after the due date. I simply did not realize that the deadline was so close, and my babysitter was not available last week. I apologize for any inconvenience this causes you.

I commend your efforts to make the IS easily understandable for all levels of familiarity with timber sales and IS's. I also like the index tabs used in the resource appendices document.

The section on old growth begins with a disclaimer about Dave Remington's paper in the SFEMP. I assume this section was included to address the fact that alternatives B and C both propose to harvest in old growth, and still call those acres old growth post-harvest. As you are surely aware, the scientific review committee that recently reviewed the three old growth options recommended that no harvesting take place in areas managed as old growth, as did Remington, and that areas should not be classified as old growth immediately post-harvest ("*cutting should cease several decades before 'potential' OG stands qualify as OG*"). You would be on much more defensible and solid ground in your FEIS old growth analysis if you did not consider areas to be old-growth immediately post-harvest.

In the FEIS, I would like to see the analysis on old growth expanded. Because old growth commitments are analyzed at the unit level, a table similar to table E-4 on the acres of high, medium and low old growth acres, by forest cover type, for the entire Stillwater State forest should be included and considered as part of the Taylor South analysis and decision. This information has already been analyzed and is available in DNRC's recent document titled *Old Growth Management on Montana State Trust Lands*. This document indicates (table B-5, page 54) that most of the old growth on the Stillwater is low attribute and that there is a 2,192 acre deficit of high attribute old growth. Given this, I recommend that you exclude all high attribute acres from both action alternatives in order to stay within DNRC's biodiversity guidelines. To harvest high attribute old growth would appear to violate these guidelines.

I also recommend that you refrain from any harvesting in all medium attribute old growth that may meet the Green et al. Old growth definitions, with the possible exception of purely restoration harvesting in the ponderosa pine cover type. As you are surely aware, the scientific

review committee recommends using the Green et al. Old growth definitions. Given the known deficit of high attribute old growth on the Stillwater, there are probably very few acres of old growth that will meet the Green old growth definitions. Quite likely, the Stillwater will soon find itself needing to recruit large trees in order to meet their old growth commitment, regardless of the old growth acreage commitment.

3 I would also like to see information on the individual old growth attributes included in the FEIS, particularly large trees and snags. Although the IS stated that information on old growth attributes was included in the wildlife sections, I could only find quantitative analyses on canopy cover. I was particularly surprised to find no quantitative analysis on large trees and snags in the discussion for pileated woodpeckers. To assess changes in wildlife habitat as well as general old growth quality, these attributes really must be addressed. I would like to see pre- and post-harvest estimates for large trees and snags for all old growth stands.

4 I would like to see a discussion of your plans to develop an old growth network in the FEIS. In the scientific review committee's presentation, they discussed the fact that until the public can see on maps exactly where an agency plans on managing for old growth, the interested public will remain suspicious and will continually question the agency's plans to harvest old growth. It would your job a lot easier Bob, if you could step back and take the time to develop such a network. Then you would know clearly which old growth you can and cannot harvest. The MOGP is very interested in assisting you to develop such networks on the Stillwater, as well as on the SRSF and Coal Creek.

5 One final comment is actually a question. Table E-3 contains information on old growth acres that is quantitatively different from a similar table in the Chicken Werner timber sale IS. This 1999 IS stated that there were only 8,731 acres of old growth on the Stillwater, which is less than the commitment of 9,452 acres, for a *deficit* of 721 acres. Although both IS's use the same definition for old growth, the Taylor South IS states that there are now 11,304 acres old growth, which is a *surplus* of 774 acres over the commitment of 10,530 acres. I would appreciate an explanation of why both the old growth commitment and the current old growth acreage have increased.

Thank you for considering these comments.

Sincerely,

Jane Adams

closure levels provide a broad landscape analysis of potential late-successional habitat for pileated woodpeckers, and, possibly, a more reliable analysis than large live tree and snag estimates. Field reviews gave the impression that higher-quality late-successional stands were being retained in comparison to those proposed for harvesting. However, the SLI estimates of large (more than 21 inches DBH) live and dead trees (within and not within proposed harvest units) have been included in TABLES F-7a and F-7b in the FEIS Errata. The estimates indicate higher numbers of large live and dead trees in stands not within the proposed harvest units. Therefore, a relatively high amount of potential habitat of better quality is being retained according to field reviews and the SLI. The postharvest quality of potential pileated woodpecker habitat within harvest units would be reduced, removing these areas from being categorized as potential pileated woodpecker habitat.

As stated in the DEIS APPENDIX B-STIPULATIONS AND SPECIFICATIONS, pages B-3 and B-4 and APPENDIX F-WILDLIFE, page F-27, snag recruitment and retention guidance would be met or exceeded, ensuring the occurrence of various structural attributes for wildlife species in future stands. The Action Alternative B harvest plans would log 80 to 90 percent of the proposed unit area and would retain an average of 2 of the largest-diameter trees per acre within the entire proposed harvest area. The Action Alternative C harvest plans would log over 95 percent of the proposed unit areas and would retain an average of 2 of the largest-diameter trees per acre within the entire proposed harvest area.

4. A discussion on plans for the development of an old-growth network is not within the scope of this timber sale project. As stated in *DEIS APPENDIX E-VEGETATION*, page E-17, Stillwater Unit has initiated some planning concepts in relation to reserves or old-growth networks, but this will likely be further adjusted due to the Technical Review Team recommendations and Land Board decisions.
5. The difference in acres of old-growth between the 2 EISS is that they are from 2 different databases, different land bases, and different years. Chicken-Werner was based on the TIMBST\_97 database and was based on only the main blocked ownership of Stillwater State Forest. The old-growth addressed in this EIS was based on the STWE\_OGI\_00 database, which includes the main block plus the scattered sections north in Lincoln County. Also, please note that the numbers you describe are for old-growth within the western larch/Douglas-fir cover type.



TAYLOR SOUTH TIMBER SALE PROJECT  
ACRONYMS

A.C.B.	Montana State University Grant	Board	Board of Land Commissioners
A.C.I.	Montana State University - Morrill Grant	MBF	thousand board feet
BMP	Best Management Practices	MCA	Montana Codes Annotated
CCC	Civilian Conservation Corps	MEPA	Montana Environmental Policy Act
C.S.	Common School Grant	MMBF	million board feet
dbh	Diameter at breast height	NWLO	Northwestern Land Office
D.D. & A.	Deaf Blind School Grant	SFLMP	State Forest Land Management Plan
DEQ	Department of Environmental Quality	SLI	stand-level inventory
DFWP	Montana Department of Fish, Wildlife and Parks	S.M.	School of Mines Grant
DEIS	Draft Environmental Impact Statement	SMZ	streamside management zone
DNRC	Department of Natural Resources and Conservation	S.N.S.	State Normal School
EA	Environmental Assessment	SSFI	sale-specific forest improvement
ECA	equivalent clearcut acres	TMDL	total maximum daily load
EIS	Environmental Impact Statement	TPA	trees per acre
FEIS	Final Environmental Impact Statement	USFS	United States Forest Service
FI	forest improvement	WYI	water yield increase
FNF	Flathead National Forest	124 Permit	Stream Preservation Act Permit
HB	House Bill	3A Authorization	A Short-term Exemption from Montana's Surface Water Quality Standards
ID Team	Interdisciplinary Team		
FOGI	Full Old-Growth Index		
Land			

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