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Comments: The possible improvements to water quality, fish habitat, and wildlife habitats from implementation of the Modified Proposed Action are well-considered. Yet, many of the benefits tend to be predicated on future compliance with the rules by forestry operators and forest users. The anthropogenic deficiencies on the landscape now are often the results of insufficient responses to problems as they were identified. Thus, the inferred benefits to those resources in this document are deceiving when taken in the context of past responses to noncompliance. Therefore, it may require many more affirmative actions with intents to help improve water quality, fish habitat, and wildlife habitats to get at what is being inferred (analyzed) in the EA.

Firewood cutting will need to be well-monitored so as to provide the net benefits it is credited with. Many of the unauthorized roads being addressed in this project can be ascribed to past firewood harvest activities. Thus, the program must be managed differently, including the strict non-harvest of snag trees, so as to ensure the mitigation of habitat risks.

Forestry operations with ground-based equipment is injurious to soils and disruptive to hydrologic infiltration and runoff patterns. Monitoring the implementation of the best management practices designed to mitigate those injuries is poorly defined. Thus, the risks to hydrologic functions (increases in drainage networks, sediment transport to streams, rapid runoff) are understated; unless it is assumed that the BMPs are followed to the letter. In practice, they usually are not.

Stated adaptations for climate change within the plan actions are generally indiscernible. The objective of helping restore a resilient forest generally integrates the need to provide those. Yet, it is difficult to know what they are and their magnitudes. Which actions are designed to provide climate-change resilience ?

The greatest benefits to target wildlife species may be derived from staggering treatment throughout a project area. For instance thinning out of some of the more dense forest could benefit Flammulated Owls in time, but could have short-term impacts while the undergrowth re-establishes itself. So treatments need to be staggered so as to not cause population reductions. Similar circumstances may present themselves toward providing betterments of habitat for Northern Spotted Owl.

Justifying removals of snags or future snags (as "danger trees") with creations of snags by means of prescribed burning is insufficient. It is important to have snags well-distributed throughout the landscape (in addition to have core patches of them in burns) as not all wildlife that need snags on the landscape are able to just utilize the small patches of burned habitat. We need both. Criteria for what are danger trees needs to strongly favor leaving them when there is doubt. Not the opposite.

Similarly, leave the larger trees that are dying on the landscape as they are the future recruits for snags. If we only leave the healthy trees, we will have a further deficiency in snags after the current ones fall down.

There is a perception that Black-backed and Three-toed woodpeckers benefit from older trees, when the research doesn't really bear that out.

The amount of large woody matter planned to be left as downed material is insufficient for wildlife. Small material does add to a fuel source w/o providing much wildlife habitat, while larger wood provides valuable wildlife habitat.

Burned stands are stated to provide insects for Black-backed and Three-toed woodpeckers for around 30 years. Recent studies do not bear this out, with the actual use by species like Black-backed woodpecker being much

shorter than 30 years. Conversely, firewood cutting in burned Lodgepole stands is said to not resume for at least 5 years. If we are directly creating habitat for these species, we recommend longer than 5 years as the species are likely still using them for longer periods. Consult research done in this area by T Lorenz and group.

Recent research has shown that while White-headed woodpeckers do like older stands of Ponderosa pine, they will inhabit younger stands that are open and have older snags for foraging and cavity excavation. It is believed that snag components are just as important if not more than the age of the forest they are in. Thus, saying that the is no white-headed woodpecker habitat in the Little Crow project area is rather bold. Recent work with White-headed woodpeckers in Yakima and Kittitas Counties have shown them to use disturbed lands. They are often not associated with older forest stands.

Pileated woodpeckers do regularly use riparian habitat and likely prefer riparian habitat over more dry forest areas. Revision to text stating the contrary is needed.