

## Appendix D

### Comment Letter and Forest Service Response

During the thirty (30) day public comment period including the public meeting, one (1) comment was received. The comment was submitted in the required format specified under 36 CFR 215 and a determination was made that the comment met the requirements for "substantive". The comment letter and the Forest Service response letter are displayed below.

To: Ms. Amber Kamps  
District Ranger Lincoln Ranger District.  
Helena National Forest.

Ms. Kamps.

The following is my comments pertaining to the environmental assessment for the Lincoln airport special use permit under 36 CFR 215.

I am very much against the expansion of the existing permit.

The lands involved in this project are National Forest lands that were purchased for and designated under the present Helena National Forest plan to be used for the administration of the Lincoln Ranger District. If this project is approved it will forever dedicate these lands to the Lincoln airport. The airport is not directly associated with the administration of National Forest lands.

The Lincoln Ranger Station is the only district on the Helena National Forest that is located in a Forested setting. It has always attracted visitor with its beautiful stand of ponderosa pine. These stands of large ponderosa pines were once present though out the valley are all but gone. The administration site at the Lincoln Ranger station is one of the few left. With this expansion of the airport along with the clearing along highway 200 hundred for the power line will forever change the historical landscape of the Lincoln Ranger District. The lost of pasture for administration of Forest Service stock will add to the need and cost of pasture. This project would also lessen future options for administration possibilities, and to the present assess to the Blackfoot River.

Thank you, for this opportunity to comment



Jerry K. Burns

PO box 116 Lincoln Montana 59639

**File Code:** 2300

**Date:** April 27, 2005

Dear Mr. Burns,

Thank you for your comment on the Environmental Assessment for the Lincoln Airport Special Use Permit. You were the only formal commenter for this project and the only commenter throughout the discussion over the last several years with negative input regarding environmental consequences of the airport improvements project on National Forest lands.

I have reviewed your comments in detail and have considered them in my decision. The following is my response to your comments and how they were used in my decision.

As you are aware, since 1964 the Lincoln Airport has been operating on 25.57 acres of National Forest land under authorized use. The total area of land being considered for the new permit is approximately 40 acres, an additional 14.5 acres. The additional acreage under consideration on this project would increase the total amount of land under authorized use to approximately 27 percent of the total administrative site, an increase of approximately 10 percent. One-hundred ten (110) acres of this administrative site or 73 percent is not associated with the special use activity.

I believe the Lincoln airport is directly associated with the administration of National Forest lands for reasons I will expand on later in this letter. The existing Lincoln airport was in place when the Helena Forest Plan was developed and the A-1 management area designation was assigned to this site in 1986. The airport use and the Special Use permit were not deemed to be in conflict with the management area designation and direction at that time or some specific language would have been included in the Forest Plan to address the conflict. It is my conclusion the intended use of the National Forest land being considered for authorized use by the Montana Department of Transportation (MDT) for the operation of the Lincoln Airport does not conflict with or violate any of the management goals established for this Administrative A-1 Site as defined in the Helena National Forest Plan. In addition, Forest Plan Forest-wide standards for Land Uses state that: The Forest will "Enhance resource management by working with other agencies and landowners to develop and achieve common resource objectives" and "Adjacent private lands will not preclude multiple use management of lands administered by the Forest Service. But management of Forest Service land will be modified where appropriate and necessary to complement land uses on adjacent non-Federal property". (Helena National Forest Plan, Items 2 and 6, Page II/29)

I am quite proud to be managing a District compound that is located in such a forested setting. The Lincoln Ranger District compound will continue to be a forested setting with large mature Ponderosa Pine trees even after the activity which would be authorized under the special use permit and the power line work along Highway 200. MDT has estimated approximately 123 large trees (greater than 18" diameter) will be removed for FAA safety reasons from National Forest Land under the project. The majority of these trees are located adjacent to the airport boundary on the north side of the existing runway. The tree removal associated with this permit

will not detract from the visual quality of the area from Highway 200 or the main office building. The tree removal for the power line is outside the scope of this project.

The tree removal will also not cut every large diameter ponderosa pine on the administrative site, the majority of these trees will remain. The authorization of this permit will change the way the compound looks, however for the reasons listed above I disagree that it will “forever change the historical landscape”. The tree clearing proposed under the project is consistent with management practices for A-1 sites and is consistent with past need for tree clearing in the immediate vicinity of the airport. Additionally, specific mitigation measures to minimize the impacts associated with tree clearing on the project have been coordinated with the District Fisheries Biologist, Wildlife Biologist, and the U.S. Fish and Wildlife Service. Special requirements have been included in the construction contract to minimize impacts to the areas immediately adjacent to the Blackfoot River.

The administrative site provides secondary pasture area for the Lincoln Ranger District pack stock. The area under authorized use by the MDT under this Special Use permit would result in a net loss of 14.5 acres for pasture, since the previously authorized 25.5 acres has not been available for pasture. District personnel keep pack stock in Lincoln for approximately six months each year. Regardless of this loss of 14.5 acres, we will still require additional pasture lands that include Indian Meadows Guard Station, Baldy, and an additional pasture which has historically been under lease for primary pasture (Spauls). The three pasture sites are sufficient for the needs of grazing the pack stock and the loss of forage on 14.5 acres of secondary pasture will not impact the District stock program. With the acquisition of the Nature Conservancy lands, District personnel are looking at these lands for potential pasture opportunities. It is my intention to secure these potential pasture areas under the A-1 management area and to initiate NEPA to change the management area direction for Baldy as well.

After further investigation on the access to the Blackfoot River, I have determined there will be little change as a result of this permit issuance. The previous Special Use Permit allows “nonexclusive use and public access” to the permitted land (item 18 of the Special Use Permit). This provision will remain in the new Special Use Permit. The only change will be the ease of access. Currently, the land permitted to MDT for the airport is partitioned by a four-wire farm fence. Access to and through the permitted land can essentially be anywhere along the fence line (ie. through the fence). After the project is completed, a new 8-foot wildlife fence will be constructed around the airport. This will restrict access to the airport and permitted land through six (6) new gates, which will be open to the public. Another access corridor has historically been through a shared easement across airport property at the west end of the runway. The Montana Department of Transportation recently purchased two tracts of land at this end of the airport from the individual who was record holder of the easement. As a result of this land purchase, all right, title, and interest in the easement was conveyed to MDT.

As with any decision, there are trade-offs with any potential impacts both environmental and social. I have worked closely with the interdisciplinary team and understand these trade-offs, including the issues that you have raised. The proposed action has a finding of no significant impacts. Therefore, my decision has largely been based on what is the best use of this land for the public good. This is in recognition that this land is identified as an administrative site, yet still considered public land. My decision to authorize this permit is based on the following:

- Without the authorization of this permit, the airport cannot be upgraded to FAA standards and will not be eligible for Federal funding. Pavement conditions will eventually deteriorate to a point that the airport can no longer be used and the facility would be closed. The improvements are not to upgrade this facility to accommodate more or larger aircraft, but to be able to use the site for current activity.
- The airport design improvements will allow for a greater spatial separation of fixed wing use and helicopter use. This design element is an issue of particular interest to the Forest Service related to safe helicopter operations supporting fire suppression and other resource activities.
- It is critical to provide a site that is in compliance with FAA standards and safety regulations for the current use. As a public officer, I feel it would be irresponsible to not authorize a permit to allow for the use of the airport that includes the necessary improvements. This is due to the needs of the community, particularly for emergencies such as air ambulance service and fire fighting.
- The USFS is the dominant user of the airport for firefighting purposes in the summer months. I am not willing to accept the risk or the liability of not having an airport to standard and knowingly allowing the use of it in its current condition. The improvements and permit authorization are critical to the safety of firefighters and pilots as well as being responsive to fire suppression. This is especially the case when we have communities at risk as we did with the Lincoln Complex fires in 2003.

I feel my decision to allow for the improvements to the airport on National Forest land and approve the special use permit contribute to the Helena National Forest's ability to "care for the land and serve the people", which is the mission of the U.S. Forest Service. Most importantly, this decision is necessary to accomplish this mission safely.

Thank you for taking the time to comment on this project Jerry. I also appreciate that we sat down and visited about your concerns and the rationale for this decision in a respectful manner. Your letter and this response will be included as part of the EA and FONSI document as well as the project record. Please also refer to the EA that provides a discussion on the issues you raise in more detail.

Sincerely,

/s/ AmberDawn Kamps

AMBERDAWN KAMPS  
District Ranger