

United States Forest R-1
Department of Service
Agriculture

Reply To: 1570 (215)

Date: April 4, 1997

Subject: Sawmill Timber Sale, Appeal #97-01-00-0032,
Bitterroot NF

To: Appeal Deciding Officer

This is my recommendation on disposition of the Appeal filed by James Olsen on behalf of the Friends of the Bitterroot, Inc. protesting the Stevensville District Ranger's Decision Memo (DM) for the Sawmill Timber Sale on the Bitterroot National Forest.

The District Ranger has selected Alternative C which will harvest an estimated 134 MBF of timber on about 54 acres. This alternative will harvest diseased green trees and trees that are susceptible to insects, disease, and wildfire or lack the characteristics necessary for a healthy ecosystem. Snags will be left to meet Forest Plan standards. Road drainage improvements will be completed on Road 710.

APPEAL SUMMARY

The Appellant alleges violations of the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations, and the Administrative Procedures Act.

The Appellant requests the DM be remanded and an Environmental Impact Statement (EIS) be prepared which complies with NEPA/CEQ regulations and the Forest Plan.

An Informal Meeting was held, but no resolution was reached. No Interested Party comments were received.

FINDINGS

My recommendation is based upon the following evaluation:

Clarity of the Decision and Rationale

The DM is clear, well written, brief and easily understood when read in conjunction with the project file. Even though not a requirement, I believe the DM could have been improved by including a discussion of the purpose and need for action and the rationale for selecting Alternative C.

I conclude the District Ranger made a reasoned and informed decision.

Comprehension of the Benefits and Purpose of the Proposal

The purpose and need is clearly written and consistent with Forest Plan goals and direction for the project area.

I believe the DM could have been improved by stating the benefits of the selected alternative and the consequences of taking no action or of implementing Alternative B.

I conclude that the benefits and purpose of the decision are adequately supported. It is apparent when the documentation is read in its entirety why the action must be taken.

Consistency of the Decision with Policy, Direction, and Supporting Information

Although this project is not identified as an ecosystem management project, ecosystem management principles and concepts are incorporated into the design.

The DM identifies that the project area is susceptible to insect, disease and wildfire. The analysis in the project file contains a good description of the need for action to sustain ecosystems in the lodge pole pine stands. A strong link between the purpose and need for action and the Forest Plan desired condition was not developed; however, the purpose and need is tied closely to the goals for the specific management areas. Ecosystem processes at the stand scale are recognized and documented in describing the effects of the no-action alternative for fire, fuels and vegetation.

The project is consistent with the "Forest Service Ethics and Course to the Future" as well as implements Forest Plan direction.

Analysis procedures and techniques used are based on accepted methodologies. The DM explains that there are no adverse effects or any extraordinary circumstances associated with this project. Mitigation measures for the selected alternative are listed in Chapter 2 of the analysis.

Based on the description of the purpose and need and the action proposed, a categorical exclusion from documentation in an EA or EIS is appropriate.

I am convinced the project is consistent with all legal and regulatory requirements, as well as current Forest Service policy.

Effectiveness of Public Participation Activities and Use of Comments

Public participation efforts were more than adequate for a DM. The District Ranger scoped the project, held public meetings and responded to concerns of the public.

Public participation was used to help develop site-specific issues. Issues were verified with the commentors, and responses were documented in a report and sent to all who contacted the District.

The roadless entry issue was considered for alternative development, but not studied in detail. However, it is clearly explained why this issue was not considered in detail. Based on public concerns, the design of the proposal deliberately focused on avoiding many of the issues which were identified during scoping.

Comments were responded to in a positive, informative tone.

I find the public participation methods used were more than adequate for the size and scope of the project.

Requested Changes And Objections of the Appellants

The Appeal is clearly written and easily understood. The Appeal demonstrates the Appellant is knowledgeable of the proposal and the area. The Appellant requests an EIS be prepared due to significant effects to the roadless character. The Appellant feels there is an underlying conspiracy to develop roadless lands.

Many of the Appellant's arguments express opinions that represent a philosophical difference regarding Forest Plan management allocations.

I conclude the requested relief is unwarranted.

RECOMMENDATION

I recommend the District Ranger's decision be affirmed and the Appellant's requested relief be denied.

/s/ William W. Boettcher

WILLIAM W. BOETTCHER
Appeal Reviewing Officer
Director, Coop Forestry and Forest
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