

United States Forest R-1
Department of Service
Agriculture

Reply To: 1570 (215)

Date: August 28, 1997

Subject: Twomile Visual Rehabilitation Timber Sale
Appeal #97-01-00-0101, Lolo NF

To: Appeal Deciding Officer

This is my recommendation on disposition of the appeal filed by Erik Ryberg on behalf of The Ecology Center, Inc. protesting the Superior District Ranger's Decision Notice (DN) for the Twomile Visual Rehabilitation project on the Lolo National Forest.

The District Ranger's decision implements Alternative C which will harvest an estimated .5 MMBF of timber products from about 50 acres, using helicopter logging, and followed by burning, About 28 acres will be planted. No roads will be built. Mitigation measures and management requirements from the Two Joe Timber Sales Environmental Impact Statement, Appendix C, are incorporated into this decision.

My review was conducted pursuant to, and in accordance with, 36 CFR 215.19 to ensure the analysis and decision are in compliance with applicable laws, regulations, policy, and orders. The Appeal Record, including the Appellants' objections and recommended changes, has been thoroughly reviewed.

APPEAL SUMMARY

The Appellants allege violation of the Appeal Reform Act and appeal regulations. The Appellants request the decision be withdrawn until the appeal points are addressed and resolved.

No informal meeting was held, and no interested party comments were received.

FINDINGS

My recommendation is based upon the following evaluation:

Clarity

The decision is well documented, and the actions are clearly and accurately described. Reasons for the decision are clearly documented and references are made to the EA.

Mitigation design features are identified in the EA, and monitoring requirements are incorporated by reference to the Two Joe Timber Sales Environmental Impact Statement.

The maps are appropriate to the scope of the project and are legible and understandable.

I conclude the decision is clearly written and easily understood.

Purpose of the Proposal and Comprehension of Benefits

The purpose and need are clearly stated and are specific to the project. The relationship between the purpose and need and the Forest Plan is clearly demonstrated.

The consequences of taking no action are clearly stated in the DN and EA. The no-action alternative is given full consideration, and it is apparent it would not meet the purpose and need for the proposed action. The benefits of the purpose and need are well stated in the EA, but could have been more clearly brought forward into the DN.

The Responsible Official identified the issues evaluated in making the decision, but they could have been better developed as decision criteria. The issues are the source and rationale for the decision criteria. The relationship between the decision criteria and the selected alternative could have been more clearly displayed in the DN, but they were well developed in the EA. Alternatives are compared to the decision criteria. The EA outlines the reasons for not reviewing some alternatives in detail. The DN explains how the selected alternative responds to public issues.

I conclude the decision documentation supports the need for, and the benefits of, the proposed project.

Consistency With Policy, Direction, and Supporting Information

The EA and DN do an excellent job describing visual management goals for the project area and tying the proposed action to those goals. Forest Plan visual objectives provide the basis for the purpose and need.

The EA describes ecosystem management principles and concepts in relation to the limited scope of this proposal. The EA also discloses the social benefits of the proposal and its effects on the biological aspects of the ecosystem. The EA and DN provide an adequate description of the ecological consequences of not taking action and utilize those consequences in supporting the selected action.

Although no specific features of the Interior Columbia River Basin Ecosystem Assessment are discussed, it is evident that ecological and social principals were considered.

The Finding of No Significant Impact (FONSI) is clear and supported by the documentation. The FONSI would have been strengthened by providing direct references to the related analysis contained in the effects section of the EA. The FONSI explains the determination of no significant impact in terms of both context and intensity.

I conclude the decision is consistent with all applicable State and Federal laws and policy, as well as Forest Service policy and direction.

Effectiveness of Public Participation Activities and Use of Comments

Public involvement was conducted through scoping letters, news releases, and legal ads. The Confederated Salish and Kootenai Tribes and local, State, and Federal agencies were contacted.

Issues were identified and separated into five categories. The relationship between the comments and issues is clearly identified. The EA explains how issues are utilized in analysis of alternatives, and it is disclosed why some issues were not reviewed in detail.

Alternative D was suggested by the public. Two other alternatives were based on public comment but later dropped. The reasons for dropping these alternatives is clearly documented in the EA.

All issues were considered and addressed in the analysis. The Responsible Official formally responded to the comments although the tone of some responses was not always positive.

I conclude public involvement was adequate for this project. However, since

this was a visual rehabilitation project, field trips or a public meeting with slides of the area may have been helpful.

RECOMMENDATION

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

/s/ Clyde G. Weller

CLYDE G. WELLER
Appeal Reviewing Officer
Deputy Director, Engineering