

Middle East Fork Project Summary of Objection Issues and Suggested Remedies

Project Name: Middle East Fork Hazardous Fuels Reduction Project
Objector: Thomas, Craig
Objection Number: 0009

Issue 1. (PROCESS) I object to the USFS analysis of alternative 3 as it has never met purpose and need, was not collaboratively developed within the community of proposed treatment, is scientifically incorrect, proposes areas and actions outside of the areas, and others. It does not effectively meet HFRA sec 2 purposes 1, 2, 3, or 6a, b & c, or title III sec. 301 a) 1, 2, 3, & 4. Alternative 3 also is in direct difference to the general direction of congress. By analyzing Alternative 3, the USFS has given some measure of credibility to the proposing group and you must address this solidly in the final decision.

Suggested remedy: One option is to scientifically point out the inadequacies of the solution, and another is to allow the group to complete their proposal on the ground.

Regional Review and Response: We understand and respect that you do not agree with the Forest Supervisor's decision to analyze Alternative 3. The reasons for this decision are explained on pages 2-3, 2-4, 2-5, 2-6, and 2-56 of the FEIS. Alternative 3 was analyzed because it provided the decision maker with a contrast in approaches to meeting the purpose and need – and in fact it does show a significant difference in meeting the purpose and need based on the objective measurement criteria as summarized on pages 2-32, 2-33 and 2-34. This is also addressed in the response to Public Concern 10002 (Volume II, Appendix H, p. 78 of 193) and Public Concern 10016 (p. 86 of 193).

Issue 2. (OTHER) I object to the many mitigation factors that have been injected into the Final FEIS. Please do not destroy the opportunity for success by incorporating excessive mitigations into the implementation of the treatment.

Suggested remedy: This can be addressed by using stewardship contracts that allow the mitigation factors to be prescribed by the contractor to meet the concerns of each specific operation.

Regional Review and Response: The Resource Specialists considered the technical feasibility and economic impacts of a specific mitigation before it was proposed. Only those mitigations deemed necessary to protect a resource were required. See response to Public Concern 36141, 3123, and 31532.

Issue 3. (HARVEST) I object to the methods of harvest restriction. Please do not destroy the opportunity for success by incorporating excessive mitigations into the implementation of the treatment.

Suggested remedy: This can be addressed by using stewardship contracts that allow the mitigation factors to be prescribed by the contractor to meet the concerns of each specific operation.

Regional Review and Response: Stewardship contracts are planned to implement this project if Alternative 2 is selected. The Contractor will have the ability to submit a proposal in which they may select the method/tools to meet the desired end-product. A service contract would be required to implement Alternative 3.

Please note that Resource Specialists considered the technical feasibility and economic impacts of a specific mitigation before it was proposed. Only those mitigations deemed necessary to protect a resource were required. See response to Public Concern 36141, 3123, and 31532.

Issue 4. (HARVEST) I object to the limitations placed upon harvest by the interpretation of INFISH.

Suggested remedy: We should follow Montana BMP's.

Regional Review and Response: Public Concern 3333 describes in detail the relationship between Montana Streamside Management Zone (SMZ) Law, TMDL, and the Forest Plan as amended by INFISH. It further describes why the recommendation will best protect resources.

Issue 5. (SOIL) I object to the conservative interpretation of the SQS. They are being used to eliminate or limit ground-based treatments.

Suggested remedy: These need to be relaxed.

Regional Review and Response: The Region 1 Soil Quality Standard (SQS) was applied per policy. Though there may be disagreement as to the actual amount of detrimental soil disturbance within the units, the objective of the Region 1 SQS is to have all areas of the Forest provide long-term soil and site sustainability. We feel this has been accomplished through the use of site-specific mitigations and Best Management Practice's (BMP). The amount of current detrimental soil disturbance is only one factor Interdisciplinary Teams (IDTs) use to select a logging method. Ground-based harvest systems, whether used in the summer or winter operating season, have the highest risk of leading to ground disturbance (Final Environmental Impact Statement (FEIS) pp. 3, 5, 17-18 and 20-23). Thus, these methods are mitigated and selected when site conditions warrant.

Issue 6. (PROCESS) I object to the large potential size of the project (13mmbf) as it could be offered as one large project.

Suggested remedy: Diversify the options for success by offering several smaller projects. Another suggestion: If you do Alternative 2, I suggest that Dave hand off that project to his team, and he should spearhead several smaller projects that can be quickly completed. Divide the proceeds of these into three equal parts give 1/3 to the RAC, 1/3 to the Friends of the Bitterroot (FOB), and 1/3 to the specialists of the Forest. This will provide each, as well as the

public, with tangible results and the economic abilities to complete specially needed tasks which are important to them as a reinvestment in the Bitterroot National Forest (BNF). We must place the Forest first and each of these has ideas of importance for improvements to the Forest.

Regional Review and Response: If Alternative 2 is selected in a decision, it is envisioned as one larger stewardship contract and four smaller timber sale or stewardship contracts. This is explained in Appendix G of the FEIS (Volume 2, pp. G-1 through G-6).

Issue 7. (PROCESS) I object that the USFS did not analyze Alternative T, it was the only alternative that was offered that has several completed projects.

Suggested remedy: I suggest that I be allowed to complete several projects on the Forest.

Regional Review and Response: We understand and respect that the objector does not agree with the decision that was made to analyze Alternative 3 and not the Alternative T, which he submitted. The reasons for this decision are explained on pages 2-3, 2-4, 2-5, 2-6, and 2-56. The Forest Supervisor determined that by analyzing the Proposed Action, Alternative T would essentially be analyzed. This is also addressed in the response to Public Concern 10002 (Volume II, Appendix H, p. 78 of 193) and Public Concern 10016 (p. 86 of 193).

Issue 8. (PROCESS) I object to the USFS not accepting the input of the public.

Suggested remedy: The best way to resolve this is to let each alternative be carried out on the ground. The USFS can do theirs and the authors of each alternative shall do theirs. On the ground is when the rubber meets the road and this will bring forth the most effective future solution. This can easily be accomplished by using the format of the Community Forest Heritage Bill of which Dave Bull has a copy.

Regional Review and Response: Public comments received on the DEIS were considered and incorporated into the analysis in the FEIS. The objector's remedy will be considered.

Issue 9. (PROCESS) I object to the way the public process for decision making has been carried out. An excessive number of people have been involved. The responsible parties are Abigail Kimball, Dave Bull and Tracy Hollingshead.

Suggested remedy: No others should be allowed in this decision making process. Everybody else, me included, is a resource to be utilized, but you are the decision makers for this project.

Regional Review and Response: Dave Bull is the responsible official and decision maker for this project. Dave uses various resources, as the objector suggests, in decision making. He considers the professional analysis conducted by his staff and the interests and concerns of the public.