

## **Middle East Fork Project Summary of Objection Issues and Suggested Remedies**

**Project Name:** Middle East Fork Hazardous Fuels Reduction Project  
**Objector:** Julia Altemus, Montana Logging Association  
**Objection Number:** 0021

**Issue 1. (HARVEST) The harvest levels proposed in Alternative 2 are not large enough or responsive enough to significantly address the bark beetle epidemic.**

**Suggested remedy:** Use more aggressive commercial and pre-commercial vegetative treatments. Additional ground-truthing and reconnaissance should be conducted with members of the Montana Logging Association and BNF staff to design better silvicultural treatments that meet desired future conditions.

**Regional Review and Response:** This concern is addressed in the response to Public Concern Statement 3611 in Volume 2, Appendix H of the Final Environmental Impact Statement (FEIS) which states that the level of treatment in Alternative 2 best meets the project purpose and need, as well as the Forest Plan goals and objectives, while striking a balance between all affected resources. Some potential treatments were eliminated to reduce or eliminate impacts to other resources. For example, Public Concern Statement 31513 lists the reasons for eliminating 14 units due to watershed concerns.

**Issue 2. (LANDSCAPE) Burning over 5,700 acres to change fire regime condition class does not meet the intent of the National Forest Management Act, the Multiple-Use Sustained Yield Act of 1960, and the Forest and Rangeland Renewable Resources Planning Act of 1974.**

**Suggested remedy:** BNF staff should walk the units with forest practitioners that are experienced in ground-based and skyline yarding systems, and together, design better silvicultural treatments that meet desired future conditions.

**Regional Review and Response:** The prescribed fire treatments planned for the Middle East Fork (MEF) project are not intended to affect the overstory. Prescribed surface fires will reduce hazardous fuels and make a positive change in Fire Regime Condition Class (FRCC). On May 4, 2005, the Bitterroot National Forest (BNF) staff did visit some of the units with this Objector on a field trip sponsored by the Objector. The silvicultural prescriptions and logging plan were discussed. Moreover, during the past 2 years the staff (which includes persons with graduate-level education in logging engineering and silviculture, and coupled with an excess of 20 years practical experience) has reviewed each unit to ensure the project was well designed and engineered (see FEIS pp. 3.2-7, 3.2-63 and 3.2-65 and response to Public Concern 3625). The treatments proposed represent a collaborative effort to best meet a variety of goals, objectives, and mitigations.

**Issue 3. (HARVEST) The site-specific forest plan amendment in Alternative 2 would leave too many snags on the landscape. Those snags will eventually produce fuel loads that are well above HFRA and fire/fuel management standards. They will also endanger the very resources the amendment is designed to protect (i.e. cavity nesting birds and soil productivity).**

**Suggested remedy:** Manage snags using current forest plan standards.

**Regional Review and Response:** The number of snags that would be retained in the project is based on the scientific literature of what would be expected in the historic range for that habitat type (p. 3.6-20 of the FEIS). The response to Public Concern 33209 and 36141 provide additional information on the site-specific concerns that lead to the snag and coarse woody debris (CWD) mitigation for the project. Wildlife, soils, and fire effects were considered.

**Issue 4. (PROCESS) The site-specific forest plan amendment in Alternative 2 that addresses timber harvest or removal on lands designated as unsuitable for timber production may not be necessary.**

**Suggested remedy:** The language in the National Forest Management Act and the Multiple-Use Sustained Yield Act specifically denotes the difference between "timber harvest" and "timber production" on suitable and unsuitable lands. If the language in the 1987 Forest Plan is different from that found in those two laws, then the site-specific forest plan amendment is appropriate. If the language is the same, then the amendment is not needed.

**Regional Review and Response:** The Bitterroot Forest Plan (1987) restricts "timber harvest" on lands identified as unsuitable for regulated "timber production" or timber management as described on page 1-14 to 1-15 of the FEIS. Lands identified as unsuitable are proposed for "timber harvest" to meet the project objectives. Therefore, a site-specific Forest Plan amendment is required to allow "timber harvest" as a tool to meet the purpose and need of the project.

**Issue 5. (PROCESS) The Forest should not have spent time or money analyzing Alternative 3 because it does not meet the purpose and need. Also, the Forest should not have discounted Alternative T because it does meet the purpose and need.**

**Suggested remedy:** Remove Alternative 3 from the FEIS document and do not consider it during the objection period.

**Regional Review and Response:** The Region understands and respects that the objector does not agree with the decision the Forest Supervisor made to analyze Alternative 3 and not Alternative T. 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. 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 2, Appendix H, p. 78 of 193) and Public Concern 10016 (p. 86 of 193).