

United States Forest R-1
Department of Service
Agriculture

Reply To: 1570 (215)

Date: September 25, 1997

Subject: South Side Ecosystem Management Proposal
Appeal #97-01-00-0097, Beaverhead-Deerlodge NF

To: Appeal Deciding Officer

This is my recommendation on disposition of the appeal filed by Sara Jane Johnson on behalf of Native Ecosystems Council protesting the Wisdom District Ranger's Decision Notice (DN) for the South Side Ecosystem Management Proposal on the Beaverhead-Deerlodge National Forests.

The District Ranger's decision implements Alternative C which will restore and maintain open, park-like stands of Douglas-fir; remove tree colonization in sagebrush and grass parks; harvest post and poles; and improve visuals on two units.

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 violations of Forest Plan direction, the National Environmental Policy Act, and the National Forest Management Act. The Appellants request the decision be remanded.

An informal meeting was held on August 22, but no resolution was reached. No interested party comments were received.

FINDINGS

My recommendation is based upon the following evaluation:

Clarity

The decision is concisely stated and well described. References are used in the DN to clarify the decision, and the literature referenced is included as an appendix.

Changes to mitigation are explained in the DN and reference to the Environmental Assessment (EA) which has a more detailed description is made.

The maps are good, but it would be helpful to have a map of the analysis area.

I conclude the decision is well documented and easily understood.

Purpose of the Proposal and Comprehension of Benefits

The purpose and need are clear when read in combination with the EA. The DN states the project meets Forest Plan direction, and the EA included a more indepth description. As an ecosystem project, a better description of the desired condition, historic and existing conditions would have made comprehension of this project easier to follow.

The consequences of the no-action alternative are clearly stated, and it was

given full consideration. The benefits of the selected alternative are stated in terms of the purpose and need and are compared to the no-action alternative.

The decision criteria is identified in the DN, and the source and rationale for the criteria are given. The relationship between the decision criteria and the selected alternative is documented in the DN.

There is a good discussion of why the selected alternative was chosen over the others. The EA discloses why some alternatives were considered but not given detailed review. The selected alternative responds to public comment.

I conclude the decision documentation supports the need for, and the benefit of, the proposed action.

Consistency With Policy, Direction, and Supporting Information

The project is consistent with Forest Plan goals, objectives, and standards, as well as the goals and standards for Management Areas 20, 24, 25, and 26.

Ecosystem management principles are used in developing the purpose and need and design for the project. The selected alternative will move the area toward the desired conditions for the management areas and meets the purpose and need for the project.

Tables, that were narrated, helped in understanding the differences between the alternatives. Mitigation measures applicable to the selected alternative are well documented, as well as deviations of mitigation measures described in the EA. These deviations relate to the number of stream-course crossings to be gravelled and buffers for certain treatment units. The rationale for these deviations is clearly described and supported.

The Finding of No Significant Impact (FONSI) is well written, clear, and understandable. The Responsible Official's determination of no significant impact in both context and intensity is adequate. The analysis and project file support the FONSI.

I conclude the action is consistent with all legal and regulatory requirements, as well as Forest Service Policy.

Effectiveness of Public Participation Activities and Use of Comments

The public was notified of the proposal through the use of the quarterly proposal list, legal ads, postcards, scoping letters, news releases/articles, telephone calls, and meetings upon request. Representatives from six Tribes; the Bureau of Land Management; National Park Service; Environmental Protection Agency; U.S. Fish and Wildlife Services; Natural Resource Conservation Service; and the Montana Department of Fish, Wildlife, and Parks were contacted.

Comments obtained from public scoping were used in issue identification and alternative development. The response to scoping could have more clearly disclosed how specific scoping comments were used to identify issues and develop alternatives. Response to comments received after review of the EA was complete and responsive to public concerns.

I conclude public involvement efforts were appropriate in scope.

RECOMMENDATION

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

/s/ John T. Drake

JOHN T. DRAKE
Appeal Reviewing Officer
Director, Recreation, Minerals, Lands, Heritage and Wilderness