

## Objection Issue Briefing Paper: Timber and Sustained Yield

Date: Oct. 1, 2020.  
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**DRAFT: For purposes of facilitating discussion for objection resolution process only.**

### Summary of objection issues:

- Some objectors asserted that the HLC NF should have more lands suitable for timber production and/or should conduct more harvest. Objectors contend that the planned levels of harvest are too low.
- An objector indicated timber harvest in the Elkhorns Geographic Area should be suitable only to benefit wildlife.
- An objector indicated that the Showdown Ski Area should include a unique land designation and have more specificity in plan components, including timber suitability.
- Some objectors contend that the HLC NF should have less land identified as suitable for timber production; that harvest should not be allowed in additional areas; the timber modeling should be constrained further in particular areas; and/or that harvest should be decreased in light of future climate change.

### Background information:

Timber production was a key issue that drove alternatives. There is little variance in lands suitable for timber production across alternatives because of legal and technical factors (e.g., inherent capability of the land and designations such as IRAs). No alternative results in volume outputs that achieve the sustained yield limit because the calculation of sustained yield limit is primarily based on vegetative growing conditions and does not consider harvest constraints related to accommodating other multiple uses. Footnotes were included in objectives that reflect the volumes that could be achieved with unlimited budgets while consistent with all resource constraints. There is a risk that predicted volumes and economic outcomes may not be achieved due to climate and disturbances.

The Elkhorns Wildlife Management Unit would not be suitable for timber production under any alternative, based on its wildlife emphasis. The current wording of the timber suitability plan component is: *“The Elkhorns Wildlife Management Unit is not suitable for timber production. However, timber harvest may occur to provide for other multiple use values.”* The Showdown Ski Area is considered in a similar fashion: *“Timber production is not suitable in the Showdown Ski Area. However, timber harvest is suitable for other multiple use purposes.”*

Although salvage harvest would most often occur in lands suitable for timber production, law and policy do not prohibit this activity in unsuitable lands where timber harvest is allowed. Riparian management zones would not be suitable for timber production, but timber harvest may occur in these areas in order to meet riparian habitat objectives. No salvage harvest can occur in the inner zone, and no clearcutting



would occur in any part of the riparian management zone. The timber model included harvest constraints due to resource protection plan components in riparian management zones as well as in primitive and semi-primitive recreation opportunity spectrum settings. Additional National Environmental Policy Act review will be conducted to evaluate the site-specific ecological effects of timber sales, prior to plan implementation.

Expected future climate and regeneration under warmer climate conditions was incorporated in the determination of lands suitable for timber production and volume projections. The modeling also included an increase in future disturbances based on best available scientific information. Lands with low growth and regeneration potential were excluded from lands that may be suitable for timber production. The lands suitable for timber production would be validated site-specifically prior to implementation of harvest. The analysis discloses the uncertainty associated with future growth.

**Summary examples of proposed resolution(s) submitted by objectors:**

- Identify as much land as possible for timber production suitability; do not restrict logging in riparian management zones (use streamside management zones). Provide an alternative that cuts at or near the sustained yield limit and disclose the budget necessary; and provide for a level of harvest that is responsive to forest health issues.
- Reword Elkhorns Geographic Area timber suitability component: *“The Elkhorn GA is not suitable for timber production. However, timber harvest may occur outside of roadless areas to provide for other multiple use values compatible with wildlife values and habitats.”*
- Reword Showdown Ski Area timber suitability component: *“Timber production is not suitable in the Showdown Ski Area. However, timber harvest is suitable for other multiple use purposes such as improved recreation opportunity, guest safety, protection of facilities and infrastructure, fuel reduction, and forest health.”*
- Adjust the timber modeling to lower or lessen harvest in certain recreation opportunity spectrum settings.
- Do not allow salvage logging in lands unsuitable for timber production or in riparian areas (riparian management zones).
- Reduce planned levels of harvest and lands suitable for timber production in light of climate change.
- Add plan components ensuring that the ecological costs of logging are analyzed.

**Other Objectors/Interested Persons:**

<b>Name</b>	<b>Organization</b>	<b>Obj/Interested Person</b>
Zach Angstead	Montana Wilderness Assn.	Interested Person
James Bradley		Interested Person
Al Christophersen	Elkhorn Restoration Committee	Objector
Joe Cohenour	Elkhorn Working Group	Objector
Nick Jose	Sun Mountain Lumber	Objector
Michael Korn		Interested Person
Peter Metcalf	Glacier Two-Medicine Alliance	Objector



Name	Organization	Obj/Interested Person
Zach Muse	Chief, Lincoln Rural Fire Department	Interested Person
Peter Nelson	Defenders of Wildlife	Objector
Lance Olsen		Objector
Tom Partin		Interested Person
Joshua Rhynard		Interested Person
Jason Todhunter	Montana Logging Association	Objector
Greg Warren		Objector
George Willet	Showdown Ski Area	Objector
George Wuerthner		Objector



## Objection Issue Briefing Paper: Climate and Reforestation

Date: Oct. 1, 2020.  
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### Summary of objection issues:

- Objectors contend that the final environmental impact statement and 2020 Forest Plan do not recognize novel ecosystems.
- Objectors contend that the analysis does not utilize the best available scientific information on climate change.
- Objectors contend that the 2020 Forest Plan does not provide a comprehensive strategy to address climate change.
- Objectors contend that the analysis does not adequately address the impacts of climate change relative to reforestation, resiliency, forest growth, old growth, impacts of logging, noxious weeds, and grazing.

### Background information:

The final environmental impact statement and 2020 Forest Plan disclose the potential for vegetation changes driven by climate change and disturbances. Best available scientific information was compiled and included literature submitted by the public. The analysis addresses the impacts of climate change to all resources. The final environmental impact statement and 2020 Forest Plan utilize the natural range of variation and expected future conditions to develop desired conditions for resilient vegetation. As the ecosystem adapts over time, the Plan allows for the flexibility to employ tactics such as assisted migration when supported by best available scientific information. It is not possible to predict the timing and magnitude of potential species shifts or forest decline; supporting the full range of diversity and emphasizing resilience is the best strategy to enable vegetation to respond and adapt to climate changes.

### Summary examples of proposed resolution(s) submitted by objectors:

- Provide a more thorough “whole cloth depiction” of novel ecosystems and plan components designed to address climate change.
- Provide additional analysis and strategy related to climate change.



Other Objectors/Interested Persons:

Name	Organization	Obj/Interested Person
Cory Davis		Interested Person
Sara Johnson	Native Ecosystems Council	Objector
Jocelyn Leroux (Adam Rissien, Michael Garrity)	Western Watersheds Project (Wild Earth Guardians, Alliance for the Wild Rockies)	Objector
David Mari		Interested Person
Lance Olsen		Objector



## Objection Issue Briefing Paper: Fire and Fuels Management

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### Summary of objection issue:

- Objectors assert that the analysis does not accurately address the role of climate and high severity wildfire; does not accurately depict the effects and efficacy of thinning; and that the 2020 Forest Plan fails to manage for natural wildfire.

### Background information:

The 2020 Forest Plan recognizes that fire is a natural and essential ecological disturbance that occurs along a spectrum of differing intensity, severity, and frequency that allows ecosystems to function. Fire management strives to balance the natural role of fire while minimizing the impacts from fire on values to be protected. Past and future climate and fires, including high severity, are incorporated into the vegetation modeling. As such, the expected effects of all fire regimes are incorporated into the analysis. The final environmental impact statement describes the efficacy of fuels treatments and addresses conflicting literature.

### Summary examples of proposed resolution(s) submitted by objectors:

- Revise assumptions about wildfire; acknowledge that thinning can exacerbate fire spread.

### Other Objectors/Interested Persons:

Name	Organization	Obj/Interested Person
Cory Davis		Interested Person
Sara Johnson	Native Ecosystems Council	Objector
Lance Olsen		Objector
John Tubbs	MT DNRC	Interested Person
George Wuerthner		Objector



## Objection Issue Briefing Paper: Vegetation Analysis

Date: Oct. 1, 2020.

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### Summary of objection issues:

- An objector was concerned about the projected change in effects to mixed conifer habitats.
- An objector contends that dropping a plan component related to large trees was not appropriate.

### Background information:

Between the draft and final environmental impact statements, vegetation modeling was updated to incorporate key model improvements. These changes resulted in several predictions that varied from the draft environmental impact statement. In addition, some changes were made to plan components, including dropping one desired condition related to large trees. The updates to the vegetation modeling, including mixed conifer habitats, is documented throughout the final environmental impact statement. Large trees are effectively provided for with another large-tree structure desired condition that remains in place. The guideline related to large trees was also retained. The final environmental impact statement disclosed the rationale for the changes and analyzed the effects.

### Summary examples of proposed resolution(s) submitted by objectors:

- None; the contention is that these changes were arbitrary and capricious and not properly disclosed.

### Other Objectors/Interested Persons:

Name	Organization	Obj/Interested Person
Peter Nelson	Defenders of Wildlife	Objector
Lance Olsen		Objector

