



**File Code:** 1920

**Date:** December 22, 2021

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Dear Interested Party,

The Beaverhead-Deerlodge National Forest has completed a Biennial Monitoring Evaluation Report (BMER) as required by the 2012 Planning Rule at 36 CFR 219.12(d). It evaluates monitoring questions and indicators presented in the Land Resource Management Plan (LRMP) monitoring plan chapter, in relation to management actions carried out in the plan area. Providing timely, accurate monitoring information to the responsible official and the public is a key requirement of the plan monitoring program.

Monitoring results are evaluated in order to make findings on the status or existing conditions of plan components selected for monitoring. Based on the findings, recommendations can be made for changes needed in forest plan direction, such as plan components or other plan direction for management activities and monitoring in the plan area. The BMER is designed to provide the necessary information to help the responsible official determine if changes are needed based on the BMER recommendations. *The BMER is not a decision document.* Future management decisions with appropriate environmental documentation may occur based on the BMER recommendations.

The full 2021 Biennial Monitoring Evaluation Report for the Beaverhead-Deerlodge National Forest is available at [Beaverhead-Deerlodge National Forest - Planning \(usda.gov\)](https://www.usda.gov/land-management/forest/beaverhead-deerlodge-national-forest/planning). See Table 1 for a summary of the findings and recommendations. Recommendations include both management activities and changes to the Plan monitoring program, some of which are considered substantive administrative changes as defined by the Planning regulations. Substantive administrative changes are proposed to the plan monitoring program in Table 2 based on the BMER recommendations. They are included in this letter for public notice and opportunity for comment [36 CFR 219.16(c)(6)].

Questions or comments on the BMER findings and recommendations and/or the proposed administrative changes (Table 2) may be directed to [comments-northern-beaverhead-deerlodge@usda.gov](mailto:comments-northern-beaverhead-deerlodge@usda.gov). Comments will be accepted until February 15<sup>th</sup>, 2022 (FSH 1909.12, 21.5). Administrative changes are not subject to the objection process (36 CFR 219.50). Upon considerations of comments, the proposed changes to the LRMP Monitoring Plan will be finalized and effective upon signature of the Forest Supervisor and published to the Beaverhead-Deerlodge National Forest website [Beaverhead-Deerlodge National Forest - Planning \(usda.gov\)](https://www.usda.gov/land-management/forest/beaverhead-deerlodge-national-forest/planning).

*Table 1. Summary of Findings for all Monitoring Items.*



<i>MONITORING ITEM</i>	<i>YEAR UPDATED</i>	<b>PLAN IMPLEMENTATION STATUS <sup>1</sup></b> <i>Do monitoring results demonstrate intended progress (i.e. maintaining, trending, or advancing) of the associated plan components listed with this monitoring item?</i>	<b>RECOMMENDATION</b> <i>Based on the evaluation of monitoring results, may changes be warranted?</i>	<b>MANAGEMENT</b> <i>If a change may be warranted, where may the change be needed? <sup>2</sup></i>
<b>MON – 1: Watersheds</b> What is the status of watershed ecological conditions on the forest?	2021	(B) Uncertain –  More time is needed to assess the status or progress towards this plan component.	Yes	Monitoring Plan: Modify the question to be “What is the status and trend of watershed ecological conditions on the forest?”  Management Activities: Identify more priority subwatersheds through the Watershed Condition Framework process and complete WRAPs for those priority subwatersheds.
<b>MON – 2: Key Watersheds</b> Have restoration activities resulted in improved watershed condition?	2021	(C) Uncertain – This monitoring question is difficult to answer with the indicators provided.	Yes	Monitoring Program: Information here can be adequately addressed in Monitoring Items 1 and 4. Recommend dropping this monitoring item and combining the data with Item 1.
<b>MON – 3: Watershed Analysis</b> Are restoration and conservation activities focused in priority (key) watersheds?	2021	(E) Yes – although only 20% of the Restoration Key Watersheds have had restoration activity implemented, the forest has committed resources in approximately 40% of Fish Key Watersheds on the forest, which in a 11-year timeframe since the conception of the Forest Plan seems to be progressing	Yes	Management Activities:  The forest should identify specific restoration needs in all fish and Restoration Key Watersheds. This would help move towards the aquatic’s goals and objectives for Fish and Restoration Key Watersheds.  The forest should assess whether restoration actions are complete in some key watersheds and if new

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		well towards conservation of native trout on the forest.		watersheds should be considered.
<b>MON – 4: Steam Channels</b> What is the status of stream and riparian conditions?	2021	(B) Uncertain – The indicators/measures are sufficient, but the data set is not robust enough to fully answer the monitoring question at the Forest scale due to data being available for only 2 watersheds. As we complete more watersheds and summarize data, we will have a more complete assessment and better trend metrics in future reports to answer the question for the entire forest.	Yes	Monitoring Program: Combine this monitoring item with Monitoring Item 1 because the condition of stream and riparian conditions are so closely associated watershed condition. Additionally, PIBO data will provide another metric for answering this question.
<b>MON – 5: Management Indicator Species</b> Are management activities effectively maintaining conditions for native species reproduction?	2021	(B) Uncertain – More time is needed to assess the status or progress towards this plan component.	Yes	Monitoring Program: Data on macroinvertebrate assemblages is no longer readily available through the PIBO monitoring program and we suggest exploring other ways to monitor macroinvertebrate assemblages, such as Montana DEQ monitoring done for TMDL development. Status and trends in

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				aquatic habitat are well represented through other metrics collected in the PIBO program and answers the monitoring question of “Are management activities effectively maintaining conditions for native species reproduction”?
<b>MON – 6: Best Management Practices</b> Are soil and water conservation practices (BMPs) being implemented during project work and are they resulting in protection of water quality and beneficial uses?	2021	(B) Uncertain – More time is needed to assess the status or progress towards this plan component for some BMP categories. Because of the limited number of samples, we cannot definitively determine trends at the forest level.	Yes	Management Activities: Improve consistency between BMPs described in planning documents and implementation of BMPs on-the-ground.  Watershed program to work with road and range management programs to ensure that BMPs that are implemented are effective in minimizing soil disturbance and erosion and sedimentation into nearby waterbodies.  Follow-up on and prescribe corrective/adaptive management to ensure that those actions are being implemented.
<b>MON – 7: Soil Productivity</b> How are management actions maintaining soil quality?	2021	(E) Yes – based on 2020 survey results indicating recovery of soils and coarse woody debris.	No	N/A
<b>MON – 8: Disturbance</b> Have disturbance processes (fire, climate,	2021	(B) Uncertain - More time is needed to assess the status or	Yes	Monitoring Program: Modify indicators to follow quantitative forest composition

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insects, diseases, and management actions) occurred in order to create the mosaic of species and size diversity to create resilient vegetation communities?		progress towards this plan component.  (C) Uncertain - Methods inadequate to assess the status or progress toward achieving this plan component.		objectives for Douglas-fir, lodgepole pine, aspen, whitebark pine/subalpine fir, and other forested vegetation types outlined in the Forest Plan vegetation section (p. 43-44).
<b>MON – 9: Aspen</b> Are management activities restoring aspen at the rate projected in the forest plan?	2021	(D) No – based on findings indicating that the pace of aspen restoration is not currently fast enough to achieve this goal, assuming that the lifetime of the plan is roughly 15 years.	Yes	Management Activities: Increase in the pace of mechanical aspen restoration is necessary to progress towards this objective.  Monitoring Program: Recommend combining this with question MON-10; please see recommendation under that item.
<b>MON – 10: Grasslands</b> Are management activities restoring grassland/shrublands at a rate projected in the forest plan?	2020	(D) No – The current program of work is only accomplishing 50% of the annual rate to move towards projections outlined in the Forest Plan.	Yes	Monitoring Program:  Combine MON – 9: Aspen with this monitoring item to track acres of conifer removal in grassland/shrubland, riparian, and aspen together.  Change the indicator to acres of grassland/shrubland, riparian, and aspen treated for conifer removal.
<b>MON – 11: Rare Plants</b> What is the status of rare plants?	2021	(B) Uncertain – More data is needed to understand status of most species. Two species are	Yes	Monitoring Program:  More data is needed to identify if potential management changes are needed for

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		showing downward trends.		<p>maintenance of sensitive plants on the BDNF:</p> <p>1)Monitoring of sensitive plant populations as well as data management should be prioritized</p> <p>2) Monitoring of project design feature effectiveness at mitigating effects to populations and habitats.</p> <p>3) Identification of specific restoration needs for species with downward trends.</p> <p>Management of Lemhi penstemon: prescribed fire may be needed in several populations to stimulate seedling establishment, and population persistence.</p>
<b>MON – 12: Sage Grouse</b> Are management activities occurring near historic or active sage grouse leks?	2015	(B) Uncertain – based on lack of proper reporting tool to capture data for vegetation management activities that would contribute to improving or maintaining sage grouse habitat. This reporting will be available in FY23 at the next biennial monitoring evaluation cycle.	Yes	<p>Monitoring Program: FACTS reporting needs to include implementation of projects that are impacting historic or active sage grouse leks as described in Forest Plan vegetation objectives.</p> <p>Change the question to: “Are forest management activities maintaining or improving active or historic sage grouse lek habitats?”</p>

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<b>MON – 13: Elk</b> What is the change in elk population?	2020	(E) Yes – Populations are increasing in the majority of FWP hunting districts and are at or above FWP population objectives.	No	N/A
<b>MON – 14: Winter Habitat</b> Are management activities effectively protecting high elevation winter habitats for mountain goats and wolverines?	2020	(C) Uncertain – Monitoring results are inadequate to answer this question.	Yes	Change the monitoring question by asking two separate questions.  1) What management activities are occurring in winter habitat for mountain goats and wolverine? Indicators: the number and type of management actions (other than public over-snow approved use) that overlap with areas of mountain goat and wolverine habitat where presence is known.  2) What is the trend of illegal intrusions into the Mount Jefferson Recommended Wilderness boundary? Indicators:

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				number of intrusions into the Mount Jefferson area compared to previous years.
<b>MON – 15: Wildlife Security</b> Are road and trail densities trending towards goals described by landscape?	2020	(D) No – As there was no change in open motorized road and trail density from 2015 to 2020.	Yes	Management Activities: New projects should consider reduction in OMRTD in the purpose and need.
<b>MON – 16: Weeds</b> What is the change in weed infestations?	2021	(B) Uncertain – More time is needed to address potential data discrepancies and improve reporting.	Yes	Monitoring Program: Suggest change to the monitoring item to include an indicator that addresses new species establishment. Also, improve accuracy of annual reporting data to avoid double counting remapped acres.
<b>MON-17: THIS ITEM DOES NOT EXIST</b>	N/A	N/A	N/A	N/A
<b>MON – 18: Fuels</b> Are fuels reduction projects being implemented in high-risk WUI areas?	2020	(E) Yes – because fuel reduction projects are being implemented in WUI areas with community wildfire protection plans.	Yes	Monitoring Program: Remove the term “high risk” from the monitoring question and remove the second indicator (acres of WUI with reduced fuel loadings and crown risk) as this is duplicative. This is already measured through acres of fuels reduction.
<b>MON – 19: Recreation</b>	2021	(E) Yes – as results show recreation	No	N/A



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Is the BDNF providing desired recreation opportunities?		opportunities are well provided and visitor satisfaction remains high.		
<b>MON – 20: Recreation</b> Are management actions resulting in the desired recreation settings?	2021	(E) Yes – Implementation of this plan component is trending as desired because the ROS class has remained unchanged.	No	N/A
<b>MON-21: THIS ITEM DOES NOT EXIST</b>	N/A	N/A	N/A	N/A
<b>MON – 22: Heritage</b> Are cultural resources being protected as the forest plan is implemented?	2021	(E) Yes – all projects are being evaluated/surveyed and consulted on with State Historic Preservation Office (SHPO) prior to implementation to ensure damage to cultural resources does not occur.	No	N/A
<b>MON – 23: Economics</b> What multiple use services have been provided?	2021	(E) Yes – The forest continues to support numerous jobs across a variety of industries.	No	N/A
<b>MON – 24: Timber</b> What are the changes of suitable timber lands?	2021	(E) Yes – As no changes to the suitable base have occurred.	Yes	Monitoring Program: Recommend removing this monitoring question. Changes in the suitable base do not often occur at the project level. Changes to the number of suitable acres would only occur if the Forest Plan is revised or amended.

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<b>MON – 25: Recreation</b> Are we maintaining and reconstructing campgrounds and developed sites on schedule (30% [reconstruction] over the planning period)?	2021	(D) No – based on the low % of reconstructed developed recreation sites.	Yes	Management Activities: Evaluate the need to reconstruct 30% of the developed recreation sites over the planning period.
<b>MON – 26: Timber</b> What is the status of stocking of lands and harvest unit size limits?	2021	(E) YES – as only 4% of harvested acres have not been certified as restocked within five years and all harvests over 40 acres did not require Regional Forester approval because they were the result natural catastrophic conditions such as fire, insect and disease attack, or windstorm.	Yes	Monitoring Program: Remove the indicator “Stocking of lands (trees/acre, over percent of area treated, by tree species)” for reasons stated in the discussion above and replace with metrics from <b>Error! Reference source not found.</b>

Table 2. Proposed administrative modifications to the Beaverhead-Deerlodge National Forest LRMP Monitoring Plan. Only monitoring items with substantive changes are outlined.

<b>Current Language</b>		<b>Proposed Change(s)</b>		
<b>Monitoring Item and Question</b>	<b>Indicator</b>	<b>Monitoring Item and Question</b>	<b>Indicator</b>	<b>Rationale for change</b>
MON – 1: Watersheds What is the status of watershed ecological conditions on the forest?	1. Percent of watersheds in functioning status 2. Watershed Condition Class (number of watersheds in each Class, e.g., 1, 2 or 3)	No change	Add indicators from monitoring items 2 and 4.	Monitoring items are similar enough to assess progress in watershed condition by combining indicators into a single monitoring item. Recommend combining indicators from monitoring items 1, 2, and 4 as Monitoring Item 1.

MON – 2: Key Watersheds Have restoration activities resulted in improved watershed condition?	PacFish/InFish Biological Opinion (PIBO) monitoring instream physical habitat (changes in pools, woody debris, bank angle, channel substrate, D50, aquatic invertebrates – in managed vs. unmanaged sites) Watershed Condition Class (number of watersheds moved from one Class to a higher functioning class, e.g., 3 to 2 or 2 to 1)	Remove question	Combine indicators with monitoring item 1.	Monitoring items are similar enough to assess progress in watershed condition by combining indicators into a single monitoring item. Recommend combining indicators from monitoring items 1, 2, and 4 as Monitoring Item 1.
MON – 4: Steam Channels What is the status of stream and riparian conditions?	Functional status of stream segments	Remove question	Combine indicator with monitoring item 1.	Monitoring items are similar enough to assess progress in riparian condition by combining indicators into a single monitoring item. Recommend combining indicators from monitoring items 1, 2, and 4 as Monitoring Item 1.
MON – 8: Disturbance Have disturbance processes (fire, climate, insects, diseases, and management actions) occurred in order to create the mosaic of species and size diversity to create resilient vegetation communities?	Proportion of forest types (percentage of total acres) Forest-wide and by biophysical setting for each of these measures:  01. Dominance type (i.e., cover type) note: for the rest of this analysis, R1 cover types will be a surrogate for dominance types 02. Species presence 03. Size class 04. Tree canopy cover Very large trees: 05. Very large tree subclass –	No Change	Modify indicators to follow quantitative forest composition objectives for Douglas-fir, lodgepole pine, aspen, whitebark pine/subalpine fir, and other forested vegetation types outlined in the Forest Plan vegetation section (p. 43-44).	Changing the indicator will allow for quantitative assessment of progress toward Forest Plan vegetation goals and objectives intended to create resilient vegetation communities. .

	proportion of area Forest-wide and by biosetting 06. Very large tree density, trees per acre. Snag density, snags per acre. For >15-inch DBH., >20-inch DBH., in/out Wilderness/roadless 07. Sage brush Forest-wide within non-forest types (proportion of)			
MON – 9: Aspen Are management activities restoring aspen at the rate projected in the forest plan?	Acres of conifer removal within aspen stands by: 01. Wildfire 02. Insects (bark beetle or western spruce budworm) 03. Management	Remove question	Combine indicators to monitoring item 10.	Treatments to remove conifer from aspen stands are very similar to treatments used for conifer removal in grassland and shrubland habitats and can therefore be assessed in conjunction monitoring item 10.
MON – 10: Grasslands Are management activities restoring grassland/shrublands at a rate projected in the forest plan?	Encroachment species treated (all methods) or converted by wildfire (acres of)	Are management activities restoring grassland/shrublands, riparian, and aspen at a rate projected in the forest plan?	Combine aspen acres from monitoring item 9 with this monitoring item to track acres of conifer removal in grassland/shrubland, riparian, and aspen together. Change the indicator to acres of grassland/shrubland, riparian, and aspen treated for conifer removal.	Treatments to remove conifer from aspen stands are very similar to treatments used for conifer removal in grassland and shrubland habitats and can therefore be assessed in conjunction monitoring item 9.
MON – 12: Sage Grouse Are management activities occurring near historic or active sage grouse leks?	Sagebrush cover affected by scheduled vegetation treatments on BDNF lands within 18 km of historic or active leks (acres)	Are forest management activities maintaining or improving active or historic sage grouse lek habitats?	No Change	Knowing whether or not an activity occurred near a lek is not sufficient information to determine if those activities are maintaining or improving lek habitat.
MON – 14: Winter Habitat	Mountain goats – numbers of	Change the monitoring question	Indicators: the number and type of	Habitat may be a better indicator for

Are management activities effectively protecting high elevation winter habitats for mountain goats and wolverines?	<p>Snowmobile entries into non-motorized high elevation units protected for wolverines and mountain goats</p> <p>Wolverines – presence or absence in high elevation habitats</p>	<p>by asking two separate questions. What management activities are occurring in winter habitat for mountain goats and wolverine?</p> <p>What is the trend of illegal intrusions into the Mount Jefferson Recommended Wilderness boundary?</p>	<p>management actions (other than public over-snow approved use) that overlap with areas of mountain goat and wolverine habitat where presence is known.</p> <p>Indicators: number of intrusions into the Mount Jefferson area compared to previous years</p>	<p>effects to these species because detailed information regarding animal populations is not readily available.</p> <p>Developing a trend for snowmobile intrusions into the Mount Jefferson Recommend Wilderness will aid the Forest in managing that area.</p>
MON – 16: Weeds What is the change in weed infestations?	<p>Weed Infestations (acres of known infestations)</p> <p>New species (Number of sites and extent)</p> <p>Inventoried noxious weed infestations</p>	No Change	<p>Suggest change to the monitoring item to include an indicator that addresses new species establishment</p>	<p>It is important to highlight previously undetected weed species so that proper management actions can be taken to minimize establishment and spread.</p>
MON – 18: Fuels Are fuels reduction projects being implemented in high-risk WUI areas?	<p>Wildland Urban Interface (WUI): Reduce the risk from wildfire to communities and resources in the following order of priority:</p> <ol style="list-style-type: none"> <li>1. Areas where a community wildfire protection plan has been developed.</li> <li>2. High risk areas adjacent to communities, for example: condition classes 2 and 3 in fire regimes 1, 2, &amp; 3.</li> <li>3. Areas in condition class 2 and 3 in fire regimes 4 &amp; 5.</li> <li>4. Areas to be maintained in condition class 1</li> </ol>	<p>Are fuels reduction projects being implemented in WUI areas? Remove the term “high risk” from the monitoring question and remove the second indicator (acres of WUI with reduced fuel loadings and crown risk) as this is duplicative. This is already measured through acres of fuels reduction.</p>	<ol style="list-style-type: none"> <li>1. Areas where a community wildfire protection plan has been developed.</li> <li>2. Areas in condition class 2 and 3 in fire regimes 4 &amp; 5.</li> <li>3. Areas to be maintained in condition class 1</li> </ol>	<p>Remove the term “high risk” from the monitoring question and remove the second indicator (acres of WUI with reduced fuel loadings and crown risk) as this is duplicative. This is already measured through acres of fuels reduction.</p>
MON – 24: Timber What are the changes of suitable timber lands?	Suitable timber lands (total acres, acres taken out of, and acres put into)	Remove Question	Remove Indicators	<p>Changes to the number of suitable acres would only occur if the Forest</p>

				Plan is revised or amended.
MON – 26: Timber What is the status of stocking of lands and harvest unit size limits?	Stocking of lands (trees/acre, over percent of area treated, by tree species) on greater than 40-acre regeneration harvest units.	No Change	<p>Replace indicator with the following:</p> <p>Total acres of regeneration harvest.</p> <p>Acres restocked within 5 years.</p> <p>Acres restocked beyond 5 years.</p> <p>Acres not stocked post-harvest.</p> <p>Acres currently progressing towards stocking.</p>	<p>NFMA does not prescribe minimum stocking standards (trees per acre, tree species, percent of area stocked); rather these are completed on a stand-by-stand and project-by-project basis by a certified silviculturist; however, NFMA does dictate that regeneration harvests are only allowed where <i>“there is assurance that such lands can be adequately restocked within five years after harvest”</i>.</p>

Sincerely,

*Cheri A. Ford*  
Forest Supervisor

cc: Doherty, Shelby