

# **R1 Objection Review Worksheet**

## **A-BLT EA and draft DN**

### **Objector – John Errecart**

#### **Issue 1 – Regeneration Openings Greater than 40 Acres**

An objector contends that the rationale regarding the chance of expansion of root disease and/or Douglas-fir beetle violates National Forest Management Act regulations at 36 CFR 219.11(d) when most of the stands in the project area are in the low to moderate range for Douglas-fir beetle and root disease.

##### **Response:**

The objector feels that insufficient evidence was provided to justify openings greater than 40 acres. Although the Forest Health Protection (FHP) Trip Report (Forest Health Trip Report: A-BLT Project, 2019 and 2020) indicate there are Douglas-fir Beetles (DFB) within the project area, and noted areas to be moderately susceptible, these trip reports also indicate there is presence of root disease and several opportunities to reduce the impacts from DFB and root disease through silvicultural treatments (Sturdevant, 2019). The 2020 FHP Report further specifies that it is important to assess the severity of the root disease in a stand before thinning to determine the type of harvest necessary. In the District Request to Exceed 40 acre openings (project record, document I01-013), it states that *“FHP agreed with original proposed regeneration harvest as the only viable method of treating the extent of insect and disease issues identified in the proposed action”*. However, the objector is correct in his observation that this statement is not included verbatim nor inferred in either FHP report and that neither of the FHP reports state that treatment units larger than 40 acres are needed or that by deferring treatments in some areas, so treatment areas are less than or equal to 40 acres, that unacceptable insect or disease mortality would occur within these areas.

The objector also states that he has reviewed past harvest within the project area and that root disease may not be as aggressive in the project area as in other areas, and suggests that the presence of root disease does not eliminate intermediate treatment nor does it warrant openings over 40 acres in size. The Request to Exceed the 40 Acre Opening document contains ranges of the Root Disease Severity ranges observed in each unit proposed for openings greater than 40 acres in Table 1, Summary of Treatments Resulting in Forest Openings Greater than 40 Acres. The objector disputes the observed ratings within some of the units.

The responsible official will clearly articulate the current and desired conditions and short-term and long-term management strategies that support regeneration harvest exceeding 40 acres. Additionally, the responsible official will clarify which of the effects analyzed correspond to the larger openings.

## Issue 2 – Cover-Forage Ratio

An objector asserts that the cover-forage ratio as defined in the 1986 Lolo Forest Plan (pp. III-84, VII-41) was violated due to insufficient analysis methods and a lack of field verification. The objector contends that without intensive field data collection to accurately identify thermal cover versus hiding cover, all findings are disputable.

### Response:

The National Forest Management Act (NFMA) requires that projects follow the applicable forest plan (unless a forest plan amendment is implemented following the planning rule). That includes following standards outlined in the plan. Standard 7 for MA 18<sup>1</sup> (“winter range with timber”) in the Lolo Forest Plan states, “retain as a minimum of 50:50 cover:forage ratio. The majority<sup>2</sup> of cover should be thermal cover, that is, trees greater than or equal to 40 feet tall *with a crown density greater than or equal to 50 percent*,” (p. III-84, emphasis added). Thermal cover is also defined in the forest plan glossary as: “Cover used by animals to ameliorate chilling effects of weather; for elk, a stand of coniferous trees 40 feet or taller *with an average crown closure of 70 percent or more*,” (p. VII-41, emphasis added). Forage is defined as, “all browse and nonwoody plants available to livestock or wildlife for feed,” (VII-12). The forest plan glossary does not define “crown density” nor “crown closure”.

The objector brought this contention forward during scoping. The responsible official documented how the contention was considered in the EA (pp. 6, 60-63) and wildlife report (I07-001, pp. 35-37). In response to the contention, regeneration harvest units were dropped in response to the objector’s scoping comments (EA, Document A-001, p. 12; Draft DN, Document A-002, p. 9); and, at the request of the objector, the cover to forage ratio analysis was conducted at several scales to consider past and ongoing timber harvest (EA, p. 62; wildlife report, p. 37).

The methodology and analysis process used to analyze the cover to forage ratio was documented in “Elk Analysis Metadata Calcs” (I07-009). The methodology included the use of VMap, a Region 1 Forest Service modeling program. One of the attributes included in VMap is canopy cover; this, along with three other attributes “can be mapped and used to support mid and base-level analysis and planning,” (I07-007, p. 1). Field verification of VMap occurred as part of the accuracy assessment of the development of the model, which has an accuracy ranging from 62-91%, depending on the attribute. This accuracy exceeds national standards (I07-009, p. 13). Tree canopy summary results from VMap are displayed in “VMap Tree Cover Map” (I07-008).

The EA disclosed the effects to elk, including direct, indirect, and cumulative effects to winter range and the cover to forage ratio (pp. 60-62). Additional information was provided in the wildlife report (Elk section, pp. 33-39). The existing condition’s cover to forage ratio is 67:33. Analysis showed the selected action would result in a 53:47 ratio, and cumulatively would result in a 65:35, 73:27, or 58:42 ratio, depending on the analysis scale. At all scales, sufficient cover would be maintained.

The responsible official worked with Montana Fish, Wildlife, and Parks during project development. In response to their concerns regarding big game vulnerability, the responsible official dropped some proposed units. Montana Fish, Wildlife, and Parks did not identify concerns regarding cover, as documented in public meeting notes (E-001). (Draft decision notice, p. 9)

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<sup>1</sup> Note that the standard also applies to winter range MAs 22 (retention – winter range) and 23 (partial retention – winter range).

<sup>2</sup> The plan does not define what “majority” is in the standard.

Based on review of the environmental effects described in the A-BLT EA, the responsible official documented that the selected action is consistent with NFMA and the forest plan (FONSI, intensity factor #10, p. 113; NFMA section of draft decision notice, pp. 13-16). However, following review of the project record, I determined that documentation is needed to strengthen the FONSI's determination that the proposed action is compliant with NFMA. Therefore, I provided instructions and recommendations to the responsible official. The responsible official will disclose changes made because of this review in the final Decision Notice.