

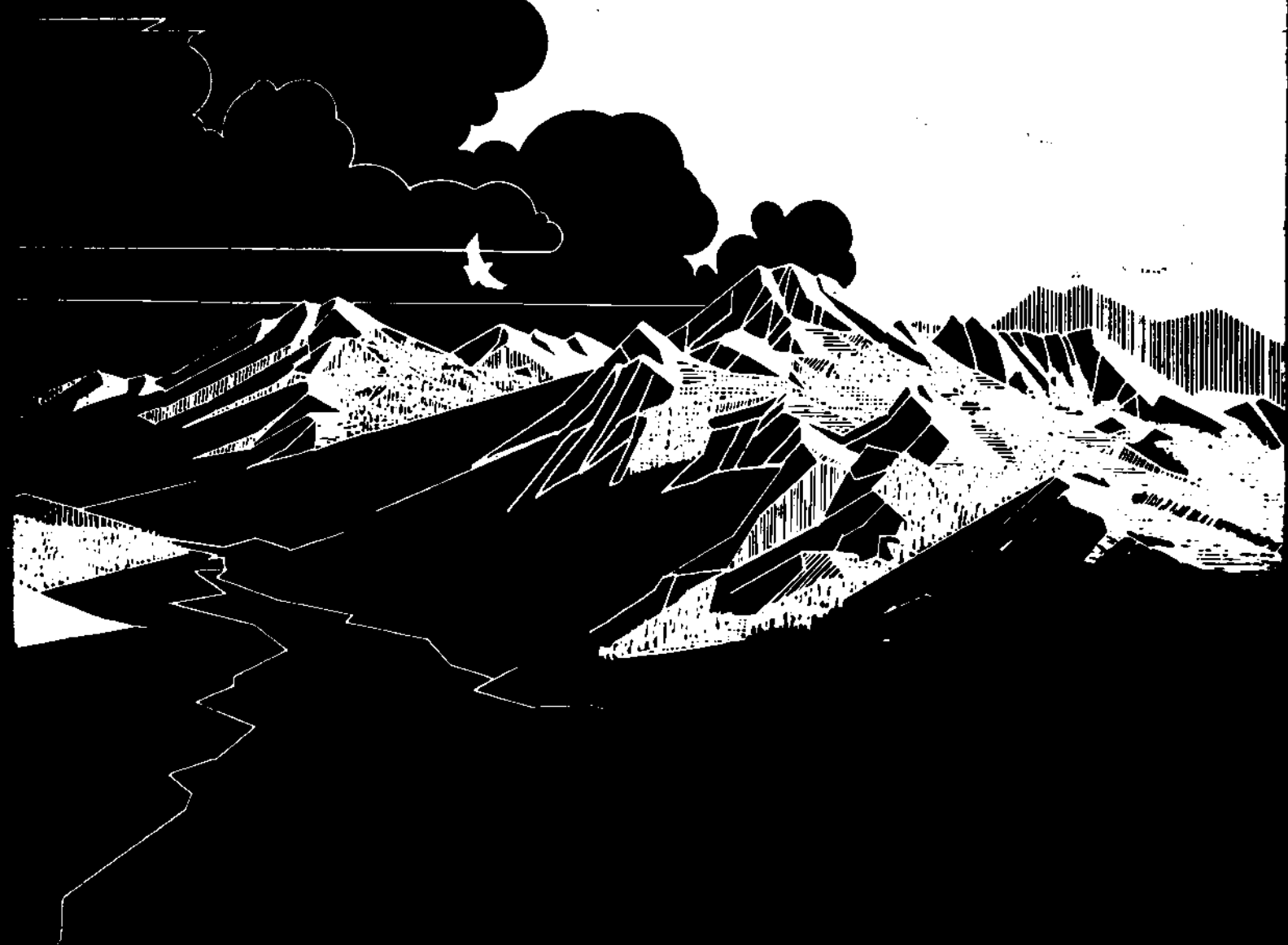


United States  
Department of  
Agriculture



Forest Service  
Flathead  
National Forest

# Environmental Impact Statement Vol I



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## APPENDIX C

### 1974 TIMBER MANAGEMENT PLAN DEFICIENCIES AND PROCEDURES TO CORRECT THEM - FLATHEAD NATIONAL FOREST

#### A. BACKGROUND

In May 1974, the Flathead National Forest issued an Environmental Impact Statement for an interim revision of the Timber Management Plan.

In October 1976, American Timber Co., Stoltze Lumber Co., Louisiana Pacific Corp., Rudolph B. Hoecker, George Stearns, Harold McLaughlin, and Richard G. Stearns filed civil complaint vs. the Secretary of Agriculture, U.S.F.S. Chief, Northern Region Regional Forester, and Flathead National Forest Supervisor alleging the Draft and Final "interim" Timber Management Plan EIS failed to adequately assess social, economic, and natural environmental consequences of the proposed Forest Plan, did not analyze and consider reasonable alternatives to the Forest Plan, and did not comply with the NEPA (National Environmental Policy Act).

On July 16, 1979, U.S. District Judge Russell Smith in Civil Action CV-76-115-M found the 1974 EIS was not proposed under the "procedures required by law" and held the 1974 TM (Timber Management) Plan was invalid.

On August 15, 1979, the Forest Service proposed to treat the areas the Court found deficient under NEPA in a "Forest Plan," developed under the auspices of the National Forest Management Act.

#### B. AREAS OF DEFICIENCY

In Judge Smith's opinion the following deficiencies needed to be corrected.

##### 1. THE CHANGE IN THE STRATIFICATION OF THE LAND BASE

Sixty to eighty percent of the reduction in potential yield from the 1969 TM Plan to the 1974 proposal was due to a change in commercial Forest base. An additional 194,568 acres were placed in the high noncommercial Forest zone. This classification was done by a team of foresters and others with no documentation in the 1974 EIS for the reasons for the reduction of 118,034 acres from the 1969 commercial Forest base.

##### 2. LENGTH OF CONVERSION PERIOD FOR REMOVAL OF OLD-GROWTH SAWTIMBER

The justifications for lengthening the conversion period from 34 years in the 1969 TM Plan to 42 or 50 years in the 1974 EIS were aesthetics, road costs, and watershed. The 1974 EIS stated the decision to change the conversion period was that the 34-year period specified in the 1969 TM Plan would cause the Forest to have a significantly modified visual appearance and that taxpayers couldn't afford road building costs necessary to cut old growth in that time period. The 1974 EIS set the conversion period at 42 years with a temporary lengthening to 50 years

to allow for hydrologic stabilization with the understanding that adjustments would be made as more specific watershed information became available. The court found no analysis of tradeoffs, road construction costs, etc., in changing the conversion period to 42 years instead of 24 years. The temporary lengthening to 50 years was also faulted due to the blanket rather than separate watershed appraisal. In addition, conflicts of opinion among hydrologists were not dealt with.

**3. MANAGED STANDS WOULD NOT YIELD AS MUCH AS HAD BEEN PROJECTED IN EARLIER PLANS**

The 1974 EIS stated the basis for the yield projections was due to "improved information" but did not show what the information consisted of.

**C. PROPOSED PROCEDURES TO DEAL WITH DEFICIENCIES**

The following procedures have been used to address the deficiencies identified by the Court.

**1. COMMERCIAL TIMBER LAND BASE**

The major deficiency of the 1974 proposal was corrected through the Forest planning process by presenting and analyzing costs and benefits, and selecting from several land designation alternatives. The process for making the basic timber capability screen for the Forest Plan has been spelled out in a Flathead National Forest planning procedures document (219.12b dated 11/18/80). The process is analogous to the noncommercial Forest stratification for the 1974 TM Plan proposal. The criteria for classification of lands not suitable (noncommercial) of receiving consideration for timber management are plainly documented, and are measurable and mappable. The criteria are supported by scientific literature and experienced data.

**2. LENGTH OF CONVERSION PERIOD**

In previous timber management plans such as the 1969 and proposed 1974 revision, the major factors analyzed in determining alternative harvest levels were the length of conversion period for old growth and management intensities as reflected by yield projections. The Forest planning process deals not only with factors affecting growth, yield, and mortality. The major emphasis is on the economic consequences resulting from the interaction of management alternatives and biological growth and mortality. In Forest planning, the most cost effective combination of land designation, management intensities, and harvest schedule has been determined to achieve the objectives set for each alternative. Thus the rate of conversion of old growth is set for each stratification of the Forest necessary to achieve objectives and maximize economic benefits. Conversion of all old growth is no longer considered a given that is necessary or desirable to achieve in managing a Forest. Cutting of old growth or any other condition class has been scheduled with current

analysis methods only to the extent that it is necessary and/or economically desirable. Evaluation of alternative conversion periods on old growth is not necessary under the integrated planning methodology. The ecological and social costs and benefits associated with old-growth timber quantity over time has been considered in structuring and evaluating alternatives.

**3. MANAGED STAND YIELDS**

Procedures for projected yields are documented by Flathead National Forest FORPLAN Timber Yield Coefficients. The procedures are well documented, referenced, and summarized in the Forest Plan EIS thus correcting the 1974 deficiency.