

Analysis of the BDNF Partnership Strategy From a Multiple Use Perspective

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EXECUTIVE SUMMARY

The preferred alternative (5) of the new B-DNF forest plan is much more restrictive for timber harvest and motorized access than the existing plan. Motorized recreation will lose one third of its use in roadless areas plus all use in existing and additional recommended wilderness. Alt 5 also increases the acreages of roadless areas and recommended wilderness. In short the preferred alternative is very green.

But the BD Partnership Strategy developed by 3 environmental organizations and 2 timber companies restricts public access much more than the B-DNF preferred alternative. The agreement (BDPS) closes 76% of the roads on this forest and sets the goal to at least partially obliterate all of these closed roads. BDPS is a massive road-ripping project.

Because the difference between the suitable timber base in the BDPS and Alternative 5 is mostly semantic (stewardship logging on over 700,000 acres in both plans) and because there is actually some non-stewardship suitable timber base in Alt 5 but none in the agreement, the B-DNF preferred alternative should be better for logging than the BDPS.

Because recreation interests were not allowed to participate, BDPS is less friendly to recreation than Alt 5.

BDPS more than doubles the acreage of recommended wilderness. (BDPS, pp 13)

ROADS

Maximum Road Density forest wide of 1.5/mi of open, closed or vegetated roads is less than A-19 grizzly bear habitat standards on Flathead NF. (BDPS, pp 2 and 27)

Even old roads that have re-vegetated must be ripped and re-contoured to meet the standard. (BDPS, Appendix A pp 11)

Agreement requires a maximum of 1500 miles of roads. (BDPS, pp 28) That is slightly less than the Flathead NF which is only 2/3 the size of B-DNF. Also, unlike BDNF, most of the Flathead is under very strict road closure standards for grizzly bear critical habitat.

Existing B-DNF road mileage = 6179 miles open road and 6671 miles total. Alternate 5 = 6021 miles open road

1500 MILES OF OPEN ROADS IS A REDUCTION OF 76% from existing condition and 75% from the preferred alternative

YEARLONG CLOSED ROADS WILL BE OBLITERATED. (BDPS, pp 25) 6679 – 1500 = 5179 miles of road rip @ \$10,000 +/mi* = at least 52 million dollars. For comparison, 2005 total USFS national road budget for roads, capital improvement and maintenance, was 280 million. This amount of obliteration would require from stewardship logging an average of 3.5 million/ year for 15 year life of the plan just to pay for road rip. (*average actual cost on the Flathead NF and this amount is a few years old.)

Road removal is the number one priority of the agreement. (BDPS, pp 10) Viability of commercial logging is dead last in eighth place.

As a requirement of the agreement, road removal will always require re-contouring, either partial or complete, which is very expensive. (BDPS, pp 28)

New road closures as opposed to road removal will favor ripping and re-contouring the entrance to the road rather than a gate. (BDPS, pp 26) This makes the road unusable for fire fighting or other administrative uses. Thus both closures and road removal take out the road for use in management of fires or any other management purpose.

Even temporary roads will be recontoured

ALL MANAGEMENT ACTIONS MUST REDUCE ROAD DENSITY TO 1.5 mi/sq.mi. forest wide standard. (BDPS Appendix A, pp 11)

WILDERNESS

Most of the document is about eco-protection.

Recommendations do not appear to follow Wilderness Act guidelines for recommendation. Many of them have never been recommended before; as they would have been had they met the guidelines. Wilderness analysis scores on some of these are marginal or less. The analysis protocol used by B-DNF uses a numerical ranking 0-40. A roadless area must score 25 or better to be considered for recommendation as wilderness. The areas recommended by the agreement range from 18 to 38. (BDPS, pp 14-20) MUST SEE THE WILDERNESS ANALYSIS FOR THESE AREAS TO VERIFY WILDERNESS QUALIFICATIONS.

Legislative initiative:

“The Partnership pledges to actively urge Congress to pass a bill formalizing these recommendations. The bill will include language to ensure implementation of the entirety of the Partnership Strategy.” (BDPS, pp 2)

THIS PROBABLY MEANS CONGRESSIONAL DESIGNATION OF WILDERNESS.
BUT WHAT LANGUAGE WILL BE INCLUDED IN THE BILL TO GUARANTEE
THE LOGGING?

There is also considerable land not in roadless or wilderness or recommended wilderness
OR suitable timber. (BDPS, pp 5) Just sitting there closed for what reason the agreement
does not say.

TIMBER

Their number one priority for timber harvest is road removal. (BDPS, pp 10 and 29)
BDPS requires a link to restoration before logging project can occur. (BDPS, pp 29)

No harvest except stewardship contracts. (BDPS, pp 12)

What happens if stewardship authority and/or funding go away? The agreement
acknowledges that stewardship authority expires in 2014. (BDPS, pp 6) If that happens
timber receipts will go to the treasury instead of staying local for local restoration.
(BDPS, pp 6) Thus stewardship logging would cease without a procedural provision for
any other type of commercial logging. BDPS requires that FS require restoration coupled
with logging even if stewardship authority lapses. (BDPS, pp12) That means the logger
would have to do the restoration himself rather than pay for stumpage and someone else
do the restoration. Loggers are not always experienced or equipped to efficiently do this
kind of work.

No harvest on lands not in suitable timber base even after fire or other salvage event.
There are lands not in suitable or wilderness that will be locked up in this way. (BDPS,
pp 5) (BDPS, pp 26)

*“While lands may be deemed timber “suitable,” the emphasis behind standards and
guidelines are for roaded and roadless stewardship.”* (BDPS, pp 26) This is a
FOREST WIDE PRIORITY

The preferred alternative (5) of BDNF new plan calls for 212,000 acres of suitable timber
base and an additional “approximately 762,000 acres of non-suitable timberlands
potentially available for timber product harvest while meeting **other resource
objectives**.”

*“The Partnership has identified approximately 713,000 acres as appropriate for timber
production under stewardship principles.”* (BDPS, pp 29)

In actual practice there may be very little difference between the partnership’s 713,000
acres and alternative 5’s 762,000 acres; meaning that the agreement’s promise of
additional “suitable” timber base is just smoke and mirrors or to paraphrase G. Bush Sr.
“voodoo forest management”

No new permanent roads. (BDPS, pp 2)

They will burn after every stewardship project. (BDPS, pp 2)

NEPA costs for stewardship contracts will be paid by Congress. What if Congress under funds? No contracts? Who pays for admin overhead?

Timber contracts will have to pay for construction of temporary roads, total removal of temporary roads and restoration. Restoration would include biomass removal, and could include stream work, plantings, and obliteration of existing roads. (BDPS, pp 5) It is very unlikely that contractors will be able to harvest very much of the larger more valuable timber. With all these constraints, will FS be able to put together a timber sale that contractors will actually purchase?

Stewardship projects do not always pay for themselves. Therefore, there must be some federal tax monies spent to make this work. How much depends on how much restoration work is planned, how much timber is cut and the efficiency of the contractor and the FS planners. The agreement does very little analysis on this aspect but quite a lot on the wilderness piece. If Congress does not fund the stewardship, it will not fly. How can public be sure Congress will fund and continue to fund the logging side of this agreement?

RECREATION

In addition to wilderness and new wilderness there would be large areas of roadless closed to timber harvest AND summer motorized use. Some may even be closed to winter motorized. This will occur in Alt 5. as well but it looks like more will happen under BDPS. BDPS supports all closures recommended in Alt 5. (BDPS, pp 28)

Dispersed camping within 300 yards of designated motorized route not allowed. (BDPS, pp 3) Must be delineated. This is a standard feature on other forests. Part of the OHV rules.

No snowmobiles in mountain goat habitat. (BDPS, pp 3 and pp 22)

Recreation enhancement is mentioned in passing but the only examples given are for non-motorized. (BDPS, pp11)

WILDLIFE

Add goshawk and sage grouse as MIS species (BDPS, pp 21 and 23)

All management actions must assure no net loss of pure strain westslope cutthroat trout (BDPS, Appendix A)

Thereby adding more potential for new restrictions.

REFERENCES

References to the agreement (BDPS) are from a document called **PARTNERSHIP STRATEGY FOR THE BEAVERHEAD-DEERLODGE NATIONAL FOREST** dated April 14, 2006 which was downloaded from the website of Montana Trout Unlimited, one of the signers of this agreement.

References to Appendix A are from the Appendix to the BDPS also found on the Montana Trout Unlimited website.
<http://www.montanatu.org/issuesandprojects/library%20files/Appendix%20A.pdf>

References to the preferred alternative or Alt 5 are from the Beaverhead-Deerlodge Forest Plan Revision documents on the B-DNF website.