

Swan View Coalition

Nature and Human Nature on the Same Path



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September 9, 2016

Flathead National Forest
Attention: Forest Plan Revision
650 Wolfpack Way
Kalispell, MT 59901

Re: Budgets, Products, Jobs, Income, and Bias in the DEISs

Submitted via <https://cara.ecosystem-management.org/Public/CommentInput?Project=46286>

Dear Folks;

We find the sections of the DEISs dealing with budgets, products, jobs, and labor income to be very confusing. We are hopeful that our email exchanges in August with Stacy Allen and Jordan Larson will lead to some improvements in the FEIS, but we are still left with numerous concerns and unanswered questions.

1. We now understand that the timber budget for all alternatives is limited to \$4.1 million per year as the current and/or reasonably foreseeable budget (V2 DEIS, page 2-25). We also understand that, because “of low timber harvest levels, alternative C does not require the entire current budget level; rather, it is 2.2 million dollars below current levels” (V2 DEIS, page 115). Returning to page 2-25, however, the difference between \$4.1 million and the \$2.8 million timber budget for Alt. C is \$1.3 million, not 2.2. The August responses to our email never did explain why these numbers don’t square with each other and which one is correct.

2. The August email replies also failed to tell us what the total Flathead Forest budget is so the public can see the relative size of the timber budget (and other sectors of the budget). The DEISs and proposed Forest Plan fail to provide this as well. This is an essential number, given that the proposed Forest Plan would monitor the Forest’s annual budget to see if it is consistent with “the cost of implementing the Forest Plan . . . predicted in the FEIS” (page A-18). It is impossible for the public to grasp and comment on how realistically the Forest Plan budget is set and apportioned to various sectors if none is provided in the DEIS.

3. In Stacy Allen’s August 23 email response, she notes: “There is no specific requirement for economic efficiency analysis in the 2012 planning rule. Most of the economic value we are newly considering is not easily, or quantitatively analyzed. A more traditional PNV [present net value] analysis would be biasing to a strict set of resource programs, not the majority of ecosystem services.”

The V2 DEIS, at 102, nonetheless states: "Other goals that were applied for some alternatives included maximizing timber output and present net value." The V2 DEIS then goes on at length to discuss forest products to a degree out of proportion to the fact that "private employment in forestry and forest products" account for only 2.3 - 6.5% of total private employment in the four-county NW Montana area (with the lowest being Flathead and Lake counties - and we presume Missoula county would be even lower if it were included in the economic analysis area).

The Production of Natural Resources section of the DEIS and Appendix 2: Vegetation and Timber Analysis Process (and the proposed Forest Plan's Desired Future Conditions, Objectives, Guidelines, and Standards) are especially biased towards timber, in large part by defining desired future vegetative conditions that require logging and by then considering budget and grizzly bears to be "constraints" on meeting those timber harvest levels (e.g. V2 at 2-26 and 2-27). Less management, lower budgets, and greater grizzly bear security should be seen as good things both fiscally and environmentally - but the SPECTRUM model and assumptions appear to be front-loaded to favor of "the most flexibility in management and no constraints" (page 2-26).

4. Where is there a similar comparison of other measurable outputs and products, such as additional acres of grizzly bear Security Core or additional miles of road reclaimed? There is no excuse not to assign and report measures to measurable ecosystem services and to feature them as prominently as "vegetation and timber."

Instead, the DEIS uses Alt. C as the whipping post/point of comparison for showing that Alts. A, B and D produce \$3.0 - \$3.4 million more in timber income and jobs (V2, pages 202 - 208). No amount of narrative in Chapter 3 about reportedly immeasurable ecosystem services can compare to the hard cold numbers and terms that timber is presented in. For example, were Alt. C to also finish implementing A19 as would Alt. A, how many more acres of Security Core would be secured and how more miles of road would be reclaimed and no longer in need of expensive maintenance? How much money would this cost in the short term but save over the long term?

Even though some of these numbers are presented elsewhere in the DEIS, it is virtually impossible for the reader to pull all those numbers together for comparison across alternatives. What is missing from the DEISs but essential is a comprehensive Alternatives Comparison Table similar to what was presented on pages II-123 - II-142 of Vol. 1 of the 1985 Flathead Forest Plan FEIS. That's right, it's a table nearly 20 pages long, but it provides a quick view at virtually every figure one needs to know and compare.

We ask that reasonable measures be applied to ecosystem services, as was attempted in the 1985 FEIS Table II-18 referenced above. Show a clear listing of additional acres of Security Core and additional miles of road reclaimed. How about the showing the acres of habitat meeting the habitat-based recovery criteria in the Grizzly Bear Recovery Plan? Oh, that's right, there are no HBRC in the current Recovery Plan.

5. Thanks to August email responses, we can now make some sense of the Labor Income and Employment tables, Table 78 and 79, but we need to do a bit of math between the two to determine how much various types of jobs are each worth. For

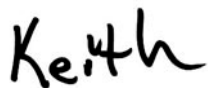
example, we find that what are most often touted as “high-paying timber jobs” are worth about \$37,000 per year. State and county jobs apparently pay much higher, because the payments to states and counties create jobs worth about \$45,000 per year. The bottom line, however, appears to be that “Income and employment levels influence by multiple use resources provided by the Forest do not fluctuate widely between alternatives.” (See V2 page 202).

Why not, then, develop and choose an alternative that has the greatest environmental benefit, such as carrying Alt. A’s A19 over into Alt. C? In this regard, we note that Tables 78 and 79 list “zero” for both labor income and jobs in “ecosystem restoration.” What if the \$2.2 million saved in timber budget under Alt. C were used to reclaim roads and increase Security Core with a continuation of A19 - would this not provide some “ecosystem restoration” labor income and jobs?

In summary, the DEISs simply don’t provide unbiased data about economics, jobs, and measureable ecosystem services in a way that a layperson can readily understand and compare across an adequate range of alternatives. While we don’t doubt that the Forest Service folks contributing to the DEIS know their jobs and disciplines well, it is essential that their methods and findings be presented in a way that anticipates the questions the public is likely to ask and the types of comparisons they are likely to want to make - and to present those in simple terms and charts/table the layperson is able to understand.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Keith". The letters are cursive and somewhat stylized.

Keith J. Hammer
Chair