



Silviculture

Eligible Objectors & Interested Persons for this issue:

- Sierra Club/Alliance for the Wild Rockies
- American Forest Resource Council
- Stevens County Cattleman's Association

Objections:

- The revised Land Management Plan (LMP) provides guidelines instead of mandatory standards for selecting trees for logging. This can result in “loopholes,” where essentially any tree could be justified for logging.
- Setting the maximum diameter at breast height (DBH) limit for harvestable trees to 20" is an arbitrary decision with little or no scientific backing. This diameter limit—which is lower and more restrictive than the Eastside Screens—will decrease management opportunities, further reduce volume outputs, decrease forest health, and increase the likelihood of litigation.
- To inform grazing allowances, vegetation management requirements in the plan need to be more explicit and there should be maps of which areas are affected by the > 500 stems per acre management constraint.
- More information is needed about which areas would be precluded from permitted grazing activities because of restrictions to protect Canada lynx habitat. The objector objected to the exclusion of public usage in Canada lynx habitat because (1) excluded areas were not identified and (2) the US Fish and Wildlife Service did not designate the areas as critical habitat because there was not sufficient information about usage or distribution of the species. The Forest Service is therefore creating a standard without justifying documentation.

Resolution Options Proposed by Objectors:

- The Forest Service could leave out any reference to diameter limits and effectively manage using the third exception which states: "*Trees need to be removed to meet, promote, or maintain desired conditions for structural stages.*" This would help drive the forest more quickly toward the Historic Range of Variability (HRV). [American Forest Resource Council]
- At minimum, the revised LMP should make any retention standards or guidelines more flexible. The current language could require extensive tree-by-tree analysis to go above 20 inches when needed for important silvicultural goals. More flexibility can be achieved by (1) deleting any reference to a specific diameter limit and (2) changing the detailed "exception" list to a statement that larger/older trees may be removed, at the discretion of the responsible official, when appropriate to land management goals. [American Forest Resource Council]

To resolve the issues raised above, the following actions will need to occur:

- The Colville National Forest needs to drop the maximum 20" DBH limit for harvest. Setting the diameter limit to 20" is an arbitrary and capricious decision made with little or no scientific backing. This diameter limit, which is lower and more



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restrictive than that found in the Eastside Screens, will decrease management opportunities, further reduce volume outputs, decrease forest health, and increase the likelihood of litigation.

- The Colville National Forest could leave out any reference to diameter limits and manage using the broad exception, which states larger/older trees may be removed, at the discretion of the responsible official, when appropriate to land management goals.