



## Why George Wuerthner is wrong about the Beaverhead-Deerlodge Partnership

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George Wuerthner clearly takes the Beaverhead Deerlodge Partnership proposal seriously and we appreciate it. In some places in his lengthy essay we think George has misread what we propose or failed to identify what will happen if the Forest Service's draft forest plan is adopted. In other instances, we simply disagree with George. We believe he has a right to his many opinions. And so does the Partnership.

Like other critics of our proposal, George has not produced his alternative for managing the Beaverhead-Deerlodge, let alone an alternative that people are increasingly discussing and supporting. Because George offers no alternative, it is reasonable to conclude he's fine with the two other formal options for managing this forest: the current forest plan, adopted in 1986, or the proposed plan, which could be adopted this winter. That's it. These are the options on the table.

### **What the Partnership is proposing**

The Partnership, for many reasons, does not support either the existing or the proposed framework for the Beaverhead-Deerlodge (B-D). Instead, we are proposing legislation that asks Congress to take key elements from the Partnership Strategy and enact them into law. To read the legislation, go to [www.b-dpartnership.org](http://www.b-dpartnership.org).

After you review the proposed legislation we propose, you will see that it accomplishes the following items.

- Divides most of the forest into six large Stewardship Landscapes. Not contemplated for any stewardship activities in this bill are lands in the Madison Ranger District or the high-divide country south of Dillon.

- Identifies within these six Stewardship Landscapes, which cover about 2.2 million acres of the Beaverhead-Deerlodge, about 700,000 acres as “eligible” for mechanical vegetative treatment. **The proposal does not say that 700,000 acres will be logged, or that we are proposing that.**
- Directs the forest to endeavor to conduct some sort of vegetation removal, on average, on 7,000 acres a year for 10 years in the 700,000 acres of eligible acres. That’s 70,000 acres over 10 years, **or 1/10 of the eligible acres, most of which have some level of pre-existing development** that created environmental problems that could be rectified. The eligible acres that see some cutting will be part of larger restoration project areas.
- Among the 700,000 acres of the stewardship eligible base are 200,000 acres – about 12 percent – of the forest’s roadless land inventory. An examination of the draft maps for the bill reveals that the bulk are slivers next to existing road systems, including tracts that though classified as “roadless,” actually have roads. **Nothing in the bill directs the agency to make it a priority to log these areas. The bill, in fact, says nothing about roadless areas. In fact, the bill clearly directs the agency to make previously developed lands with watershed and wildlife habitat damage the priority for stewardship projects.** On the other hand, there could be opportunities to remove roads from roadless areas if they are included in projects. In fact, because the agency only has to come up with 7,000 acres a year for 10 years from a base of 700,000 acres, rational people familiar with the forest can conclude there are plenty of first-stop options besides logging controversial areas that can be in projects. Roadless country is undeveloped because it’s been the least attractive to log. The bill does not change that.
- Dedicates 570,000 acres of the forest’s remaining inventoried roadless areas as congressionally protected wilderness in 16 areas. There has not been newly designated wilderness anywhere in Montana since 1983.
- Requires the Forest Service, after completion of stewardship projects, to leave a road network density of less than 1.5 linear miles per square mile. The Beaverhead-Deerlodge National Forest has, according to Forest Service estimates, 4,800 miles of classified roads, and 1,000 miles of “unclassified roads.” Some landscapes have as much as 5 miles of road per square mile. Stewardship projects will then require road decommissioning.
- Prohibits the Forest Service from building new permanent roads for stewardship projects. The only exception is when a new road is a relocation of an old road that is harmful to resources such as water quality.
- Creates a citizen resource advisory group for the forest and requires the agency to consult with it for identifying potential stewardship projects. In turn, the bill requires the Resource Advisory Committee (RAC) to create citizen advisory groups comprised of different interests and expertise to consult with the Forest Service in design and monitoring of each project. Once designed and a proposal finalized, NEPA (National Environmental Policy Act), of course, is also triggered. The Partnership believes it’s

important to create a larger, up-front role for the public in managing national forests. Those who show up work things out, those who don't can always sue.

- The bill requires the Forest Service to report to Congress five years after implementation, thereby providing an opportunity for readjustment or even elimination of the Partnership's proposal.
- The stewardship elements of the bill will last only 15 years, about the life of the next forest plan. The wilderness will be permanent.

### **Where the Partners agree and disagree with George on the facts about the B-D proposal**

- George claims we are proposing “a tripling of logging over even what even (sic) the FS is proposing in its forest plan.” Wrong. We propose 700,000 acres be eligible for potential stewardship projects, but only 70,000 acres for logging over 10 years – and with no new permanent roads, application of INFISH riparian protections standards, a requirement to reduce road densities in the project area once it's completed, and required consultation with citizen advisory groups in selection and design. We also propose that these sites not be managed first and foremost for future harvest, and, in our draft forest plan alternative, we recommended that these areas be treated liberally after harvest with fire. By comparison, the Forest is proposing to dedicate at least 216,000 acres first and foremost for timber production, with new roads, slash removal, thinning, and re-entry years later. In addition, the Forest says an additional 1.7 million acres will be considered “unsuitable” as commercial timber tracts, but “available” to log for other purposes, such as to reduce fire risk, recover “salvage” timber after a fire, lessen bug infestations, create openings for wildlife, or protect areas next to towns and homes. In other words, we propose 700,000 acres for a different type of management – with only 70,000 acres cut over 10 years. Meanwhile, the new forest plan the Forest Service wants to adopt, which we assume George supports because he offers no alternative, leaves 1.9 million acres open for logging at the discretion of the Forest Service with fewer protective standards.
- George complains that our proposed wilderness includes only rock and ice. The facts are that we are proposing every area that is seriously eligible for wilderness designation under the Wilderness Act to be designated as wilderness. Many of these areas are splendid alpine habitat that includes uncommon species such as mountain goats and wolverine that need protection from expanding motorized use. But other proposed wilderness areas include the West Pioneers, Anaconda-Pintler Wilderness additions, Stony Mountain, Sapphires and other lower elevation, forested landscapes.
- George says he would rather wait for a better wilderness bill than to settle for what we've proposed. There has been no new wilderness designated in Montana for nearly 25 years. And there is no viable wilderness alternative on the table for the Beaverhead-Deerlodge Forest. Meanwhile, in the absence of wilderness protection, motorized use – some sanctioned, some illegal – is expanding into high-quality backcountry, making it nearly impossible politically to attain wilderness designation for these tracts. One example is the Flint Creek-Dolus Lakes area where Governor Ted Schwinden recommended a 58,000-

acre wilderness in 1985. In the last wilderness bill passed by Pat Williams in 1994, motorized use had reduced this proposal to 38,000 acres. Today, the only area free of motorized activity and large enough for wilderness designation (a minimum of 5,000 acres) is the 8,300 acre Dolus Lakes Wilderness being proposed by the Partnership. Another example is the West Pioneers, which Congress designated as a 148,000-acre wilderness study area in 1977. Through Forest Service inaction, motorized recreation has expanded dramatically in the West Pioneers and today only 34,400 acres is eligible for wilderness designation (and even that will be a fight). Absent wilderness designation, the wildland base of the Beaverhead-Deerlodge will continue to erode because of expanding motorized use.

- George claims we support “ORV use over 1.6 million acres of the BDNF, and snowmobile use over 2.2 million acres.” We have never said that. What we have said is our proposal defaults to the forest plan and future travel planning for decisions on what to allow on 1.6 million acres in the summer and 2.2 million acres in the winter. The principle area where we diverge from the Forest Service is in designating wilderness, which permanently and irrevocably protects wildlands from motorized use. The draft forest plan recommends 249,000 acres of wilderness; the B-D Partnership will designate 570,000 acres as wilderness.
- George claims logging under the B-D proposal will result in harmful roads. Not true. The Partnership legislation would prohibit the construction of any new permanent roads on the Beaverhead-Deerlodge and requires the Forest Service to reduce its damaging road network so as to meet the Montana Department of Fish, Wildlife and Park standards for wildlife protection across the entire forest. Under both the current and proposed forest plans, which are the only other options on the table, the Forest Service would continue to build permanent roads and set its own standards for where and when and how to reclaim existing but unneeded roads.
- George complains how damaging logging can be. We appreciate that he is making a point for us. A prime objective of the B-D Partnership proposal is to help restore old logging damages. The forest has many acres where old logging and roads have left undersized culverts that block fish, erosion prone roads, roadside weed infestations, fewer opportunities to recruit woody debris into streams, and damaged riparian areas. We aim to use stewardship contracting to trade the value of some trees, after carefully being logged from existing developed sites, for restoration services to rectify some of the damage from the past.
- George says he thinks nature should do the restoration. Actually, for the most part, we agree. No sense tearing up old roads that are heavily grown over and can't be used by damaging motorized vehicles. On the other hand, the way nature restores, say, road crossings with undersized culverts, is to rip them out in high water, causing large-scale erosion. The way nature “restores” small populations of native fish isolated by human-caused passage barriers like culverts is to let the populations go extinct. Unfortunately, that “restoration” is occurring today. There is a definite need for active restoration on the forest. Fishery professionals, in fact, have identified hundreds of specific projects that

could occur tomorrow to benefit fish. Wildlife biologists have similar ideas for burning winter ranges, or for regenerating wildlife-important habitats such as aspen stands. If they had the money.

- George believes fire should pretty much always have its way on the forest. The Partnership agrees allowing natural fire to play a role on the Beaverhead-Deerlodge National Forest is important. But we don't necessarily believe that "natural fire" on unnatural landscapes – those modified by humans with large road systems – necessarily produces natural results. Rain, snowmelt, and high streamflows on burned landscapes that include significant road systems and undersized culverts at stream crossings can, and do, cause unnaturally high rates of erosion. And that is why we believe in order for natural fire to play a larger role on this forest – aside from in wilderness or other undeveloped landscapes – we seek to restore damaged habitats using stewardship contracting. Many of the areas that need restoration are in developed areas of the stewardship-eligible areas we recommend. They include dense road systems and large stands of dead or dying conifers, some which could be harvested using the standards we recommend. The value of these trees could be invested in restoration so that natural fire could play a larger role in the future.
- George takes us to task for supposedly "subsidizing" home development next to national forests by recommending fuel reduction projects. Most, if not all, members of the Partnership agree we shouldn't be creating incentives to build next to public forests. Some of us agree it is a homeowners' responsibility, not government's, to protect private dwellings when they live in places nature is saying is not a good idea. However, logging in wildland-urban interface areas is one thing many people seem to agree on – including groups George aligns himself with, who, in order to demonstrate "they are not against all logging," are quick to endorse, and even help design, projects around homes and towns.
- George belittles the mills we are collaborating with and finds no place whatsoever for commercial logging on the Beaverhead-Deerlodge. Montana Trout Unlimited, the Montana Wilderness Association, and the National Wildlife Federation simply disagree with George on this point. All three conservation organizations do, in fact, think that sustaining a viable timber industry is important for Montana and, especially, for the rural communities where the partnering timber companies are located. We think having a viable timber industry can be compatible with providing good jobs, restoring damaged landscapes, and permanently protecting some of Montana's most important wildlands through wilderness designation. Frankly, our timber partners in the B-D Partnership have been honest, forthright, and willing to concede much. If we are going to cut trees in this state for any purpose, including fuel treatments advocated by virtually every conservation group in the state, we will need people to work in the woods and mills to buy the product.
- George upbraids the Partnership for not embracing his view of what "science" tells us about natural fire recurrence intervals in Montana's forests. Because of global warming we are currently experiencing a warming trend that is unprecedented in the last 10,000 years and fire science, as a result, is changing rapidly. All but two snowpacks, on average statewide, in the last 20 years have been at or above the long-term average. Mean winter

and summer air temperatures are well above long-term averages. March temperatures in Missoula alone now average more than 7 degrees F higher than the long-term average. As a result, forests – logged and unlogged -- burn more readily and more frequently, irrespective of habitat type. Arguing that fire recurrence intervals calculated for any forest type in this region is high-confidence science – especially when based on only 100 years of measured data and spotty proxy information – has become a fairly irrelevant exercise. The climate baseline is simply shifting too quickly. What some scientists once considered, cool, low-frequency-fire forests – logged and unlogged – are now sites that are burning more often than “historically.”