



File Code: 1570 (218)
#15-01-00-0108

Date: JUL 29 2015

Michael Garrity
Alliance for the Wild Rockies
PO Box 505
Helena, MT 59624

Dear Mr. Garrity:

This letter is in response to your objection, filed June 12, 2015 on behalf of the Alliance for the Wild Rockies, regarding the Stonewall Vegetation Project on the Helena National Forest. The Stonewall Final Environmental Impact Statement (FEIS) and draft Record of Decision (ROD) are subject to the pre-decisional administrative review process (objection process) found at 36 CFR Part 218, Subpart A.

I have determined that your objection does not meet the requirements of 36 CFR 218.8(d)(5). As such, in accordance with 36 CFR 218.10(a)(5), I must set aside and not review your objection. The following sets forth why your June 12, 2015 objection does not meet the requirements of 36 CFR 218.8(d)(5).

Your June 12, 2015 correspondence fails to include a "description of those aspects of the proposed project addressed by the objection, including specific issues related to the proposed project" (36 CFR 218.8(d)(5)). Your correspondence also fails to provide sufficient "supporting reasons for the reviewing officer to consider" (36 CFR 218.8(d)(5)). As described below, you offer general claims that are not specific to the analysis or decision under review, and you fail to offer arguments that allow me to discern if your concerns have merit. For example:

- 1) Much of your objection merely repeats verbatim your comments on the draft EIS without explaining how they apply to the FEIS or draft ROD. In repeating your comments on the draft EIS you are not providing specific issues relating to the Stonewall project FEIS and draft ROD.
- 2) Your objection extensively paraphrases or cites assorted literature, much of which has been presented by you in prior objections. However, you fail to establish, and we cannot determine, a direct connection between the conclusions of the literature you offer, and the analysis presented in the FEIS and draft ROD.
- 3) Your objection cites documentation that appears to have no association to the Stonewall project. For instance, you cite the 2005 Sheep Creek Salvage FEIS, which is a project



from the Beaverhead-Deerlodge National Forest. You describe for seven pages the outdated and irrelevant Lynx Conservation and Assessment Strategy. And you reference management area direction (MA20), which is not found in the Helena Forest Plan.

- 4) Your objection requests review of literature, analysis of issues, and other disclosures that are clearly presented in the FEIS: for example, analysis of boreal toad (pp. 296 and 460 to 462), a map of noxious weed locations (p. 535), and a list of sensitive plant species (p. 516 to 518).
- 5) You continue to request formal Endangered Species Act (ESA) consultation for several species that are not listed under ESA, including wolverine and whitebark pine, both of which we have informed you in previous correspondence – as recently as June 10 – are not species subject to consultation.
- 6) Finally, your letter is borderline unreadable, with extreme variability in text font, size, and style; random paragraph and line breaks; repetitive sections of text; and odd strings of text characters that do not make sense.

The regulations are clear that it is the objector's responsibility to provide sufficient information to place the agency on notice regarding his or her concerns with the project (36 CFR 218.8(d)(5) and 36 CFR 218.10(a)(5)). By not citing the FEIS analysis or draft ROD decision rationale under review, and by making broad, vague allegations about the project, you are not providing supporting reasons for me to consider. Therefore, I find you are not meeting the requirements of the objection process and am setting aside your June 12, 2015 letter from review in accordance with 36 CFR 218.10(a)(5).

Sincerely,



DAVID E. SCHMID
Deputy Regional Forester

cc: Ray G. Smith
William Avey