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Forest  
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**File Code:** 1570-1 (2400)

**Date:** April 3, 2000

Bryan Bird  
Forest Conservation Council  
Southeastern Regional Office  
P.O. Box 276268  
Boca Raton, FL 33427-6268

Certified Mail-Return Receipt Requested  
P 556 954 747

RE: Appeal #00-03-00-0044-A215, McGaffey Timber Sale, Mount Taylor Ranger District,  
Cibola National Forest

Dear Mr. Bird:

This is my review decision on the appeal you filed regarding the Decision Notice, Finding of No Significant Impact and Environmental Assessment, which provide for silvicultural treatments covering 1,427 acres within the McGaffey Timber Sale analysis area of approximately 13,336 acres.

### **BACKGROUND**

On January 3, 2000, Forest Supervisor Liz Agpaoa issued a Decision Notice on the McGaffey Timber Sale. The Forest Supervisor is identified as the Responsible Official whose decision is subject to administrative review under 36 CFR 215 appeal regulations.

Pursuant to 36 CFR 215.16, an attempt was made to seek informal resolution of the appeal. The record reflects that informal resolution was not reached.

My review of this appeal has been conducted in accordance with 36 CFR 215.17. I have thoroughly reviewed the appeal record, including the recommendations of the Appeal Reviewing Officer. My review decision incorporates the appeal record.

### **APPEAL REVIEWING OFFICER'S RECOMMENDATION**

The Appeal Reviewing Officer recommended that the Responsible Official's decision on the McGaffey Timber Sale be affirmed.



**APPEAL DECISION**

After a detailed review of the records and the Appeal Reviewing Officer's recommendations, I affirm the Responsible Official's decision on the McGaffey Timber Sale.

My decision constitutes the final administrative determination of the Department of Agriculture [36 CFR 215.18(c)].

Sincerely,

/s/ James T. Gladen

JAMES T. GLADEN  
Appeal Deciding Officer  
Deputy Regional Forester, Resources

cc:  
Forest Supervisor, Cibola NF  
District Ranger, Mount Taylor RD  
FFH, R3  
Appeals & Litigation Staff, R3

**REVIEW AND FINDINGS**

of the

Forest Conservation Council

Appeal #00-03-00-0044-A215

regarding

The McGaffey Timber Sale

**ISSUE 1:** Environmental documentation

**Contention:** The appellant alleges, (t)he Forest Service must prepare an environmental impact statement analyzing the direct, indirect, and cumulative effects of the McGaffey Timber Sale.” The appellant contends the "project is highly controversial, in a scientific sense, involves highly uncertain effects and involves unique or unknown risks (40 CFR § 1508.27 (b) 4, 5)" related to reducing fire risk through logging, effects on the northern goshawk and other species, and logging in old growth stands, and therefore, the effects are significant.

**Response:** The Decision Notice and Finding of No Significant Impact finds that the environmental effects of the selected action are typical of past actions in the vicinity. The environmental assessment (EA) and record indicate that the action alternatives include fuelwood gathering and piling and burning of slash generated by the project (Project Record (PR) 84, 100, 168 p. 40). The record does not support appellant’s assertion that the effects of this project related to fire risk are controversial. A review of over 40 written comment letters (including letters from the appellant) indicate no public concern for reducing fire risk as a result of this project (PR 10, 12, 13, 14, 15, 21, 22, 23, 24, 25, 27, 29, 32, 43, 45, 46, 47, 49, 52, 53, 54, 55, 57, 58, 63, 111, 117, 121, 122, 123, 124, 125, 126, 137, 150, 172, 173, 174, 175, 176, 177, 178). The effects on the northern goshawk and old growth are discussed under Issue 2d and Issue 8, respectively.

**Finding:** The record contains an adequate effects analysis sufficient to support the conclusion that the effects of this action are not highly controversial, uncertain, unique or unknown. The analysis is appropriately documented in an EA.

**ISSUE 2:** Viability of wildlife species will not be maintained.

**Contention 2a:** The appellant alleges that the McGaffey Timber Sale, as planned, will not meet the legal and scientific standard for maintaining population viability of wildlife species associated with terrestrial and aquatic habitats of the McGaffey Analysis Area and the Zuni Mountains. The appellant contends that a legal and scientific standard for maintaining population viability should include specific objectives, and cites the conservation strategy for the northern spotted owl (Thomas, et. al. 1990):

- 1) “Of high quality and of sufficient size to ensure high rates of reproductive pair occupancy;
- 2) Spaced closely enough and of sufficient size to ensure high probabilities of being locally recolonized..., and;
- 3) Distributed so as to ensure that individuals interact among geographic locations, providing for populations that do not become demographically isolated.”

**Response:** The McGaffey Analysis Area, by itself, does not provide for any of the three items in Contention 2a. With the exception of the Zuni Mountain bluehead sucker, the federally listed Threatened, Endangered, or Proposed Species, Region 3 Sensitive Species, Forest Plan Management Indicator Species, and Forest Species of Concern occupy a far greater area than the Zuni Mountains or Cibola National Forest. The action proposed for the McGaffey Analysis Area is designed to maintain or restore habitat quality and/or quantity for a number of these species. Improving their habitats will, over time, allow for improved reproductive success of individuals currently using the area and/or an increase in the populations using the area. Neither of these outcomes will result in reducing the viability of any of these species (PR 109, 110, 152, 168, 183).

**Contention 2b:** The appellant alleges that the McGaffey Timber Sale, as planned, will not maintain population viability of wildlife species as metapopulations across the landscape. The appellant contends that the Region should manage large blocks of habitat for species rather than individual territories.

**Response:** Appellant cited Region 6's Spotted Owl Habitat Area (SOHA) network as an example of what did not work and implies Region 3's spotted owl and goshawk management direction are similar. The SOHA network relied on clusters of three or more habitat areas of 1,000 acres spaced 3-5 miles apart, with a 12-mile spacing between clusters. These clusters were distributed across the landscape in suitable and/or capable habitat. The SOHA was not necessarily placed at an occupied site, because meeting the distance requirement was more important. In addition, the 1,000 acres did not even represent the smallest home range identified by radio telemetry studies.

In contrast, Region 3 began identifying 2,000 acre Mexican spotted owl (MSO) “management territories” in the late 1980's. The size was based on average size of an MSO home range plus one standard deviation, as determined by radio telemetry. These were established wherever a single owl was found, through rigorous inventories conducted for two years prior to the occurrence of any management activity. This has resulted in numerous sites with three to ten territories in a block and a number of very large blocks with twenty to more than eighty territories. These blocks often covered all or nearly all the entire suitable habitat available. The MSO Recovery Team did not improve on this approach when developing the Recovery Plan, except for identifying that a portion of suitable or potentially suitable habitat to be managed to meet threshold conditions.

**Contention 2c:** The appellant alleges “(t)he McGaffey timber sale prescribes no conservation strategies or mitigation measures to maintain viability of most native species, in direct violation of scientific and legal standards.”

**Response:** The McGaffey Timber Sale Environmental Assessment, Wildlife Report, Biological Assessment and Evaluation, and US Fish and Wildlife Service Response to informal consultation all contain mitigation measures. In addition, the Habitat Capability Index (HCI) models used by the Forest are based on the life cycle needs of a species, habitat characteristics, and other characteristics of the species. The Management Indicator Species approach was designed to mimic the guild approach the appellant contends we should adopt. The conservation strategy for the Northern goshawk and the HCI for neotropical migratory birds were developed using a number of species habitat, life history, and population characteristics (PR 109, 110, 152, 168).

**Contention 2d:** The appellant alleges, “(t)he McGaffey timber sale fails to insure the viability of the northern goshawk and has not demonstrated that alternative nest sites have been designated. “The appellant contends that, “logging in the goshawk PFAs is an unproven method of enhancing habitat and will further degrade the habitat of this species.”

**Response:** The logging proposed in the goshawk post-fledging family area (PFA) complies with the Forest Plan standards and guidelines for management of Northern goshawks. It is designed to reduce the time it will take for vegetation structural stage (VSS) 3 habitat (poor PFA and nesting habitat) to become VSS 4 and 5 (much better PFA and nesting habitat). The Wildlife Report (PR 152) and EA (PR 168) contain maps delineating the locations of goshawk foraging areas, PFAs, nests, as well as, alternate nest sites for the two goshawk territories in the analysis area.

**Contention 2e:** The appellant alleges, “(t)he McGaffey timber sale, as planned, fails to maintain the viability of the Mexican spotted owl.”

**Response:** The logging proposed in MSO pine/oak habitat complies with the Forest Plan standards and guidelines for management of Mexican spotted owl and the MSO Recovery Plan. It is designed to significantly reduce the time it will take for this pine/oak habitat to meet threshold condition. The US Fish and Wildlife Service concurred the treatments prescribed in MSO habitat meet the Recovery Plan objectives. They also concur with the Forest's finding of may affect, not likely to adversely affect the Mexican spotted owl (PR 109, 110, 152, 168, 183).

**Contention 2f:** The appellant alleges, “(t)he McGaffey timber sale, as planned, fails to maintain the viability of the Zuni Mountain bluehead sucker.”

**Response:** No activities are proposed within or upstream of occupied habitat for the Zuni Mountain bluehead sucker. Best management practices (BMPs) are expected to eliminate the potential adverse effects road building and timber harvest would otherwise have on water quality in potential sucker habitat downstream from the project area. Closure, obliteration, and restoration of the temporary roads built for the sale and 1.5 miles of existing road will further reduce impacts to potential sucker habitat downstream from the project area.

**Contention 2g:** The appellant alleges, “(t)he McGaffey timber sale fails to insure the viability of the Abert's squirrel.”

**Response:** Currently the most limiting factor in the analysis area for the Abert's squirrel is the lack of nesting habitat (VSS 4, 5, and 6). The selected alternative will reduce the time it takes to

develop suitable nesting habitat, while not reducing the squirrel's current viability. Project activities should provide for increased populations in the analysis area in the future (PR 152, 168, 183).

**Contention 2h:** The appellant alleges, “(t)he McGaffey timber sale fails to insure the viability of the flammulated owl.”

**Response:** Most of the McGaffey Analysis Area is VSS 3, which is not good habitat for the flammulated owl. The selected alternative will reduce the time it takes to get to suitable nesting habitat, increase the retention of snags (nest trees) by closing roads, and allow for the development of hiding cover while the stand is developing VSS 4 and 5 structural conditions. The selected alternative does not include harvesting existing old growth or large trees, thus leaving the best suitable habitat intact. The proposed action will improve flammulated owl habitat for future occupancy (PR 152, 168, 183).

**Finding:** The McGaffey Timber Sale will maintain the viability of wildlife species associated with the terrestrial and aquatic habitats of the McGaffey Analysis Area and the Zuni Mountains.

### **ISSUE 3:** Soils and watershed

**Contention:** The appellant alleges, “(t)he McGaffey timber sale, as planned, fails to protect and restore water quality and watershed condition in the Rio Nutria and Rio Puerco drainages.” The appellant contends that the EA fails to disclose impacts on water quality. The appellant further contends that the project and the lack of protection for stream courses will result in a major increase in sedimentation to the Rio Nutria, which will violate New Mexico's water quality standards.

**Response:** The effects of the alternatives on soil and water (quantity and quality) were analyzed by looking at the activities that are known to directly or indirectly affect soil and water resources (PR 61, EA pp. 11-18). These included temporary road construction, road closures, sensitive soils impacted, area harvested and basal area reduction. Using a scale based on relative impacts, the alternatives were analyzed and compared. Implementation of mitigation measures or BMPs (EA pp. 15-18) as suggested by the New Mexico Environment Department (PR 150) will prevent negative impacts on water quality.

Protection of stream courses is evident in certain mitigation measures. The record (EA pp. 15-18) contains numerous BMPs that protect stream courses through proper location of skid trails and landings, designated skid trails and stream crossings, and prohibiting all equipment use within streamside management zones. The New Mexico Environment Department supported this project for its long-term effort to increase ground cover, decrease sedimentation and generally improve watershed conditions in non-perennial stream systems such as those in the McGaffey Analysis Area (PR 150).

**Finding:** Water quality impacts were adequately disclosed and planned mitigation will protect water quality and watershed condition in the Rio Nutria and Rio Puerco drainages.

**ISSUE 4:** Cumulative effects

**Contention:** The appellant alleges that the Forest Service did not complete an adequate cumulative effects analysis required by National Environmental Policy Act (NEPA). The appellant lists cumulative effects analysis on heritage, air quality, recreation, visuals, transportation, economics, soil, watershed, and wildlife habitat as being lacking.

**Response:** Cumulative effects are the effects on the environment which result from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative effects can result in individually minor, but collectively significant actions taking place over a period of time (40 CFR 1508.7).

The courts have implied that consideration of the impacts on the existing environment necessarily takes into account earlier and present actions and their effects. Therefore, an analysis of the existing environment is consideration of the effects of past and present actions. The EA (pp. 8-43) and effects reports (PR 33, 35, 36, 37, 38, 39) describe the existing environment and the past and present (ongoing) actions that shaped it.

The record contains a review of past human occupation, inventories of heritage resources, and their eligibility for nomination to the National Register of Historic Places (PR 133). Law and agency policy require survey, eligibility determination, and avoidance of eligible sites, so there would be no foreseeable actions that would cumulatively contribute to effects on heritage resources.

Air quality is addressed in the EA on page 40. The EA indicates that smoke and dust would temporarily affect air quality. Burning must be approved by the State of New Mexico (or, in some locals, the county) and is only allowed under favorable atmospheric conditions. State regulation of burning constrains the extent and duration of burning to avoid adverse cumulative effects on air quality.

The EA and record include discussions of effects on visual quality, recreation and transportation (PR 33, 37, 76, 77, 102, 183 p. 6, EA pp. 41-42, 46). The record identifies the existing system of mountain bike trails and future development. The EA includes mitigation to avoid impacts to the mountain bike trails. Visual quality is evaluated in terms of visual diversity and includes avoidance of retention zones along State Highway 400.

The EA and record contain analyses of effects from other activities on soil and watershed condition (EA pp. 44-46, PR 61). Consideration was given to past, present and reasonably foreseeable activities, including those undertaken on non-Forest Service land near the analysis area. The nature of other activities considered and their location relative to the analysis area indicate their effects are not likely to be cumulative. The use of protective mitigation measures (best management practices) in the selected alternative will result in no direct or indirect effects to water quality, thus eliminating the possibility of incremental effects from other actions.

The wildlife specialist's report considers past, present and reasonably future actions in its analysis of wildlife effects (PR 75).

The economic analysis calculates present net value from cumulative effects of the selected alternative, and other actions including hiking, pleasure driving and dispersed camping. The cumulative effects analysis includes consideration of the upcoming reconstruction of Forest Road 50, reconstruction of Quaking Aspen Campground and the transfer of ownership of Fort Wingate Army Depot. The analysis found no cumulative effects from these reasonably foreseeable future actions.

The McGaffey Timber Sale project record indicates that the Responsible Official did consider past, present and reasonably foreseeable actions and their associated cumulative effects. However, the basis for this conclusion was not cohesively summarized in the EA. Review of the record substantiates that potential effects from reasonably foreseeable actions considered in the EA and past effects from private land activities do not contribute cumulatively, because of the nature or location of the actions. The Responsible Official did consider cumulative effects and appropriately reached a finding of no significant impact.

The appellant appropriately criticizes the cumulative effects discussion being left to the end of the EA. As the appellant suggests, cumulative effects discussions are more appropriately addressed by resource, by alternative and not relegated to one all-inclusive discussion at the end of the EA. A review of the entire record is necessary to conclude the effects of these actions are bounded in space and time, such that they do not contribute cumulatively to the effects of each alternative.

**Finding:** The record includes consideration of cumulative effects on the components of the human environment. The cumulative effects analysis is adequate for an informed decision and a finding of no significant impact.

#### **ISSUE 5:** Habitat fragmentation

**Contention:** The appellant alleges “(t)he McGaffey Timber Sale EA fails to quantify or meaningfully analyze in any manner the effects of habitat fragmentation.” The appellant contends the Forest Service did not apply a model or other technique for evaluating fragmentation and resulting edge effects, “despite the routine admissions in the EA regarding the potential severity of these effects.”

**Response:** Over 90 percent of the ponderosa pine in the McGaffey Analysis Area is in dense, even-aged stands of young to mid-aged trees, due to past forest management and lack of fire. Nearly the entire piñon-juniper habitat is dense stands of mature or old growth trees with little or no understory vegetation. The chosen alternative is intended to begin the process of restoring a more natural, biologically diverse, ponderosa pine or piñon-juniper ecosystem across the landscape. The management actions will, in time, result in a mosaic of age classes and structural conditions, including multiple canopies, with an abundant and diverse understory of grasses, forbs, and shrubs. The fragmentation resulting from this condition would more closely approximate that of a natural ponderosa pine or piñon-juniper ecosystem.

The Forest identified that the primary adverse effects of this increase in fragmentation would be to some neotropical migratory birds. At the same time, this increase in fragmentation would

benefit another group of neotropical birds. A more important benefit of this more diverse condition would be the improvement in habitat conditions for deer, elk, and other game species.

**Finding:** Although the Forest did not use models to analyze fragmentation, they did adequately describe its adverse and beneficial aspects (PR 152, 168).

#### **ISSUE 6:** Road density standards

**Contention:** The appellant alleges that “(t)he McGaffey Analysis Area is in violation of the Cibola National Forest road standards and the McGaffey Timber Sale will not bring the area into compliance.” The appellant is not convinced the closure and obliteration of the 11.4 miles of temporary roads will be carried out or that they will be effective.

**Response:** As stated in the EA, the forest plan standard for road density in the analysis area is 1.3 miles of road per square mile. The Ea states that approximately 3-4 miles per square mile of road presently exist in the analysis area. The selected alternative involves construction of 11.4 miles of temporary roads, which will be subsequently closed and obliterated. In addition, 1.5 miles of existing roads will be closed. The EA points out that while none of the action alternatives attain the 1.3 miles per square mile objective, they all move the area closer to the desired road density. The Cibola Forest Plan does not require any single project to achieve the road density standard in one step.

Based upon a review of the record, there is no reason to believe the closures and obliterations will not be carried out. The Responsible Official must ensure the closures and obliterations are carried out since the EA effects analysis is predicated on this action taking place.

**Finding:** The selected action is consistent with forest plan direction to manage the road system for an average road density 1.3 miles per square mile.

#### **ISSUE 7:** Socio-economic analysis

**Contention:** The appellant alleges “(t)he economic analysis fails to assign any economic value to existing uses of the area, and fails to consider the externalized economic costs of logging.” The appellant contends that, “the Forest Service has failed to complete an economic analysis of the McGaffey Timber Sale project that provides the public with a full and fair accounting of net economic benefits.”

**Response:** Forest Service Manual (FSM) 1970 and Forest Service Handbook (FSH) 1909.17 contain detailed guidelines for conducting economic and social analysis. However, FSM 1970.3(6) states, “(s)elect cost effective methods of conducting economic and social impact analyses to ensure that the degree of analysis is commensurate with the scope and complexity of the proposed action.” Obviously not every project requires the same level of analysis. The FSM 1970.6 adds, “(t)he responsible line officer determines the scope, appropriate level, and complexity of economic and social analysis needed.”

The purpose of the economic analysis in an EA is to assist in decision making. An EA should briefly provide sufficient evidence and analysis for determining whether to prepare an EIS or a

finding of no significant impact (40 CFR §1508.9). Economic effects are not intended by themselves to require preparation of an EIS (40 CFR §1508.14).

The Forest prepared an economic analysis (PR at 166, 168, pp. 42, 43), which displays estimated costs and returns of the alternatives for the decision maker. Economic effects of the project were not identified as an issue at any time prior to the decision. Therefore, economic effects were not needed as a basis for alternative development or comparison. The level of economic analysis is commensurate with the scope of the proposed action. FSH 2409.18 section 22 states that a financial analysis should be made to determine financial efficiency of timber sales. The analysis in the project record (168, pp. 42, 43) is a financial analysis and meets this requirement.

**Finding:** The economic analysis is consistent with regulation, as well as, manual and handbook direction.

**ISSUE 8:** Old growth allocation

**Contention:** The appellant alleges, “(t)he Forest Service has not allocated old growth in accordance with the 1996 plan amendments.” The appellant maintains that the EA and project record fail to establish that forest plan procedures for allocating old growth were followed. The appellant also states that there was no analysis of old growth distribution and function at multiple scales; no analysis of risks to sustaining old growth; no analysis that considered spatial arrangement of old growth areas and how that would benefit old growth related species.

**Response:** The standards and guidelines on page 95 of the Record of Decision (ROD) for the Amendment of Forest Plans, dated June 5, 1996, require that an analysis be conducted at one scale above and one scale below the ecosystem management area. This analysis has been done. The Forest Plan standards and guidelines include: definitions of old growth; requirements to maintain or develop old growth function on at least 20 percent of naturally forested areas in any landscape; consideration of spatial arrangement; consideration of risks; and analysis at multiple scales.

One scale above the ecosystem management area level is the Forest Plan level. The Forest Plan standard requires that at least 20 percent of the forested ecosystem management area be managed for old growth. The proposed action allocates 20 percent of the McGaffey Analysis Area to old growth within ponderosa pine/Gambel oak woodland and piñon-juniper woodland (PR 109, 168 pp. 8, 9, 18, 26, 27).

Analysis at one level below the ecosystem management area was conducted at the stand level. This was based on Terrestrial Ecosystem Survey and current cover types from stand exams and multi-resource field data from the analysis area (PR 135, 152, 168 pp. 2, 183).

The Forest has shown a reasonable approach in selecting old growth and in recruiting potential old growth through thinning treatments, thus moving toward the desired 20 percent composition of old growth as directed in the ROD. Designation of existing old growth was analyzed for the ecosystem management areas, which include the McGaffey Analysis Area (PR 168, pp. 8, 9, 26). Risks to old growth were analyzed. Analysis of spatial arrangement was appropriate to the existing conditions and the need to increase the amount of old growth as rapidly as possible. The

use of treatments to protect old growth from fire and increase the longevity and growth of large trees is reasonable.

**Finding:** Old growth was analyzed at the appropriate scales, consistent with forest plan direction.

**ISSUE 9:** No-harvest alternative

**Contention:** The appellant alleges, “(t)he Forest Service is required to analyze a no-harvest alternative when proposing stewardship projects.” The appellant quotes the Forest Service Manual stating, “(w)here timber harvest is proposed primarily for the purpose of achieving forest stewardship purposes...a full range of alternatives, including practical and feasible non-harvest options, must be analyzed in the environmental process (FSM 2432.22c).”

**Response:** The formulation of alternatives is driven by significant issues identified in scoping (40 CFR §1501.2(c)). For an alternative to be reasonable, it must meet the stated purpose and need, and address one or more issues. While the manual appropriately calls for a full range of alternatives, it goes on to state, “(i)t is not necessary to include harvest or non-harvest options that are not practical or feasible from a biological, social, or legal standpoint or those that do not meet forest plan objectives or standard and guideline requirements...”

The record shows that a non-commercial harvest alternative was considered under Alternative 4 (PR 168 p. 7, 183 p. 5).

**Finding:** The analysis appropriately considered a no-harvest alternative, consistent with NEPA and its implementing regulations and FSM direction.

**ISSUE 10:** Expertise

**Contention:** The appellant alleges “(t)he Forest Service failed to utilize professionals with appropriate expertise for a project of such scale and uncertain consequences as the McGaffey Timber Sale project, nor has it included dissenting opinion or the work of scientists outside the agency.”

**Response:** FSH 1909.15 Sec. 12.1 directs that the disciplines and skills of the interdisciplinary team must be appropriate to the scope of the action and the issues identified. The teams will consist of whatever combination of Forest Service staff and other Federal government personnel is necessary to provide the necessary analytical skills. The Forest Service assembled an interdisciplinary team composed of journey level professionals representing many different land management specialties. In addition, the Forest Service consulted with professionals from the US Fish and Wildlife Service, New Mexico Department of Game and Fish and the New Mexico Environmental Department (Surface Water Quality Bureau).

**Finding:** The interdisciplinary team is eminently qualified for the McGaffey Timber Sale project analysis.

**ISSUE 11:** Conservation of forests

**Contention:** The appellant alleges, “(b)y contributing to a vast global waste of wood products, the Forest Service has failed to meet substantive obligations to conserve forests and promote use of recycled materials.”

**Response:** The objectives of the McGaffey Timber Sale are to 1) treat, through appropriate silviculture methods, forested areas of high tree density, adverse insect and disease activity and other forest health related concerns, and 2) reduce road density (EA p. 3). Neither the EA nor the project record “promotes the use of virgin materials over recycled products”, as the appellant suggests. The sale of forest products provides the economic incentive for an operator to conduct the treatments needed to meet the forest health objective.

**Finding:** The McGaffey Timber Sale does not forego conservation of wood products or the use of recycled materials.