



VIA Email: appeals-northern-region-office@usda.gov

June 25, 2020

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment during the Objection Period for the Salish Good Project.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Flathead National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC is not writing to submit a formal objection, since the objection period is open, but rather to support your Draft Record of Decision and to thank you for responding to some of our comments. We still believe that with site specific conditions on the ground, some of our earlier comments to the Project can still be implemented. AFRC submitted Draft EA comments on April 7, 2020 and will reference those comments throughout this document. AFRC believes the need to complete restoration work in the project area is paramount.

AFRC supports the Purpose for the Project which is to move the project area toward the desired conditions defined by the forest plan. The Salish Good Project proposal included four main needs for treatment in the project area which AFRC supports. Those included:

- Improve forest stand conditions related to species composition and vegetative structure.
- Provide commercial and personal-use wood products for the local economy.
- Reduce hazardous fuels to varying degrees across the landscape; create and expand fuels reduction treatments to enhance fire suppression control efforts and increase firefighter safety by reducing fire intensity.
- Reduce sediment, improve water quality, and improve aquatic species habitat in project area streams and wetlands; protect remnant Westslope cutthroat trout populations from further invasion of undesirable brook trout.

From the input letters that AFRC and others submitted, the Forest has chosen to implement alternative B with modifications. AFRC supports the Forest's decision to use this alternative, however, there were some changes from the Draft EA to the Modified Proposed Action that are pertinent to AFRC and our membership, and we would like to discuss some of those.

1. In the Draft EA comments AFRC commented that we are pleased to see that the Forest is considering commercial harvest on 6,046 acres. AFRC strongly supports your goal of the project to provide commercial and personal-use wood products for the local economy and local milling infrastructure. Alternative B Modified has now reduced the commercially treated acres by 178 acres. While we understand the reasons for the reduction, we suggest that units 12, 15, and 204 (total of approximately 69 acres) which were dropped for feasibility concerns be reexamined as optional units as the Project gets implemented. We would again like to remind the Forest that the National Forests in Montana are very important for providing the raw materials that sawmills within the State need to operate. The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand.
2. In the Draft EA we commented that we think Alternative B best meets the purpose and need of the project. AFRC always encourages the Forest to consider as many acres as possible when doing an EA to get needed restoration work completed more quickly, reduce fire danger in the WUI, and to spread the cost of planning over more volume. The Salish Good Project will only be treating about 12% of the land base by commercial means, which AFRC questions if the Needs for this project can be met with this level of treatment.

AFRC appreciates your response to this issue and now has a better understanding of this issue with your response: *Thank you for your comments and support for the project. As noted in Table 17 of the EA the area is dominated by small to medium sized trees and the project area is predominately management areas 6c and 6b which area high intensity vegetation management areas where continued harvest entries are expected. In addition to the fire history as noted in the Cumulative Effects section of the EA over 23,000 acres of the project area have past harvest history and this planned entry will further diversify the age class distribution of stands in the area having a net benefit during any future beetle outbreaks or wildfire. Stands not proposed for treatment were evaluated and the proposal was optimized to meet a variety of resource needs as outlined in the Flathead National Forest Plan.*

3. AFRC highlighted the fact that without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable.

We appreciate the Forest Service acknowledging this important point for this project and others: *The Flathead National Forest appreciates your support in this project and recognizes the important role this forest plays in the local economy through production of raw products and job creation. This project is also an important part of our land management objectives and upcoming sale program.*

4. AFRC also had concerns regarding the adequacy of treatments in the WUI which we suggested could be improved by more commercial harvest in our Draft EA comments which stated—“Also supporting the need for commercially treating more acres is the fact that large regeneration harvests would be the best tool to help reduce the risk and severity of a large, stand replacing fire by breaking up the continuity of continuous heavy fuel across the analysis area. This would reduce fire intensity and provide greater flexibility in fire management options because there are more effective and safer management options on lower intensity fires. Since 43% of the project area is in the WUI and the Forest is only commercially treating 12% of the project area, which not all is in the WUI, AFRC is not sure the Forest is meeting the needs with this level of harvest. The 2007 Brush Creek fire is an indication that large fires can occur in the Project area due to heavy fuel loading and high fire conditions.”

AFRC appreciates the Forests response and we believe an adequate assessment of what is needed in the WUI has been made: *Harvest is one of our primary methods for meeting fuel reduction objectives because the value of the wood fiber offsets the cost of the treatment which allows us to do landscape scale fuel reduction. When we combine recent fuel reduction activities with our proposed harvest, and non-commercial activities such as pre-commercial thinning and prescribed fire, the proposed action meets our fuel reduction objectives since we also have to balance the needs of other resource areas such as wildlife. You're correct the 2007 Brush Creek fire is an indicator that large fires can occur in the project area. Past fire history also provides evidence that reoccurring large fires occur in the project area.*

5. AFRC suggested the Forest should use shaded fuel breaks up to 150 feet on both sides of the major haul roads into this Project area. A fire break totaling 300 feet could be very useful for containing the spread of wildfire, protecting the WUI, and enhancing the vigor of remaining trees.

AFRC appreciates your acknowledgment and response: *I agree with all of your points and will consider your suggestion for future projects.*

6. AFRC suggested the Forest Service shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Flathead market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. To address this issue, we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators.

We greatly appreciate the Forest's response to this request by stating: *During the sale implementation/logging phase, both Timber Sale and Stewardship Contracts maintain the flexibility to make approved changes to logging systems if needed through processes in place. Any changes to logging systems would still need to be within the range of effects analyzed in the EA.*

7. AFRC reminded the Forest that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. We asked the District to carefully consider the following three factors when making a decision to decommission any road in the project area:
 - Determination of any potential resource risk related to a road segment.
 - Determination of the access value provided by a road segment.
 - Determination of whether the resource risk outweighs the access value (for timber management and other resource needs)

AFRC believes the District adequately addressed our concerns by stating: *The project does not propose to decommission any existing system roads. All proposed temporary roads would be re-contoured as noted in PDF-SOIL-05 pg. 23 in the EA and are not needed for long term management. The road closures proposed in Alternative C would close approximately 8.3 miles of open system road to public motorized use, but would remain on the forest road system.*

8. Finally, AFRC mentioned we believe the Forest has done a good job of designing the project for the protection of both the Grizzly Bear and Canada Lynx. There is an extensive section on Grizzly Bear protection, including measures that permit no additional miles of open roads to be added to the project area and adequate blockades will be put in place to prevent public access.

AFRC was pleased to see that the Forest responded to critics of additional road miles by stating: *"The Salish Good project is entirely within zone 1 Salish Demographic Connectivity Area. The level of analysis for this project follows direction in the 2018 LMP (GA-SM-STD-01 p.132- 133). The Salish Good project is in compliance with the FNF forest plan. All proposed roads will be either gated or bermed and not open to*

public motorized use. The effects of the proposed roads is disclosed in the project EA and further discussed in project file."

AFRC would again like to thank the District for taking the time to respond to some of the key suggestions we made during the Draft EA phase. We understand that not all of our interests or concerns can be met, but we appreciate the professional reasoning that was given to all of our input topics.

Thank you for the opportunity to comment during the Salish Good Project Objection period. Again, this letter is not an objection, but our nod of approval for the project to move forward using Alternative B modified. I look forward to following this Project as it moves toward implementation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tom Partin
AFRC Consultant
921 SW Cheltenham Street
Portland, Oregon 97239