September 8, 2020

Mary Erickson

Custer Gallatin National Forest Supervisor’s Office

10 East Babcock

Bozeman, MT 59715.

Re: Custer Gallatin Revised Forest Plan Record of Decision Objection

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council (“AFRC”) files this objection to the proposed decision for the Custer-Gallatin Forest Plan Revision. Forest Supervisor Kathy Erickson is the responsible official.

Objector

Montana Logging Association

PO Box 1716

Kalispell, MT 59903

406-752-3168

MLA is a Montana trade association that represents our members who are loggers and log haulers and those who support theses businesses in Montana. Th is mission of the Montana Logging Association is to enhance the professional status of Montana timber harvesters, support their endeavors, and ensure that our state’s renewable forests provide opportunity for generations to come. The Montana Logging Association objects to the following in the preferred alternative of the Custer and Gallatin National forest plan revision.

1. Prepare an alternative that would reflect the sustained yield calculation that isn’t tied to budget constraints. None of the alternatives reflect the actual sustained yield which is shown at 38.3 mmbf. The MLA believes that this will limit future management opportunities in the future and the sole alternative to that will be of fire. MLA encourages a plan alternative that depicts what is the actual need on the ground without it being tied to budget.
2. Prepare an alternative that addresses the need of existing sawmill and logging infrastructure and with accurate numbers specific to jobs created in the timber sector. The projected time sale quanity will not support the current needs of either the logging or milling sector on the forest. The numbers specific to job increases in the timber sector aren’t accurate. If additional workforce is added from 191 to 619 than those numbers should reflect so by using the average of 12-17 jobs per mmbf harvested. That would mean at a minimum the increase should be that of 35 mmbf harvested.
3. Prepare an alternative that addresses the insect and disease problems on the forest. The proposed plan doesn’t address desired conditions and should. Timber harvest should be the primary method of treating the forest health problems on the forest. With the continued problem of beetles, spruce bud worm and potential of tussock moth moving its way into the forest should see increasing acres needed to be mechanically treated.
4. Resolution meeting. If there is a resolution meeting to resolve objectors we request to be involved.

Sincerely,

Bryan Lorengo

Southwest Regional Representative

Montana Logging Association