



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

October 14, 2019

Objection Reviewing Officer
USDA Forest Service
Northern Region
25 Fort Missoula Road
Missoula, Montana 59804

Dear Objection Reviewing Officer:

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

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 Helena-Lewis and Clark 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 an objection but rather to support your Draft Record of Decision. AFRC submitted scoping comments on the Stonewall Vegetation Project Draft Supplemental Environmental Impact Statement (Stonewall Project) on March 19, 2019. The need to complete restoration work in the project area is paramount.

In our March 19 letter AFRC commented that: *“First and foremost, time is of the essence to move this project forward to enable the Forest and forest products industry to capture any economic value left in the dead and dying stands of lodgepole in the project area.”* AFRC supports Alternative 4, the proposed action, based on the changed conditions in the project area. Alternative 4 consists of approximately 1,435 acres of treatments that were analyzed under both Alternative 2 and 3 in the Final Environmental Impact Statement. These treatments include 407

acres of pre-commercial thinning, 360 acres of improvement cuts, 152 acres of seedtree, 95 acres of shelterwood cuts, 135 acres of clearcut, 18 acres of sanitation cuts, and 270 acres of low intensity prescribed fire. AFRC is disappointed that the DSEIS only contains 760 acres of commercial harvest-down from 2,607 acres in the original Alternative 2 of the original FEIS, however, that is the result due to impacts from the fire and other resource considerations.

Further pointing out the need for rapid treatment includes that statement in the Draft Supplemental EIS which stated:

“A major factor that influences the value of the timber particularly in the Stonewall Draft Supplemental Environmental Impact Statement Project area is the quality of the dead lodgepole pine. A significant percentage of the volume in this project comes from dead lodgepole pine. The mortality is a result of the mountain pine beetle outbreak that began in 2008. Following mortality lodgepole pine retains its value as a sawlog product for a time. As the tree begins to deteriorate that value as a sawlog diminishes, however the tree may still be viable for other less valuable products.”

AFRC supported the Purpose and Need of the project including:

- Improve the mix of vegetation composition and structure across the landscape that is diverse, resilient and sustainable to wildfire and insects.
- Enhance and restore aspen, western larch, and ponderosa pine species and habitats.
- Modify fire behavior to enhance community protection while creating conditions that allow the reestablishment of fire as a natural process on the landscape.
- Integrate restoration with socioeconomic considerations.
- Utilize economic value of trees with economic removal.

The 760 acres of commercial harvest is important for AFRC member sawmills who need sawlogs to operate their plants. These plants are important for the jobs they create in local communities and for counties-the socioeconomic considerations. Currently, Montana's forest products industry is one of the largest components of manufacturing in the state and employs roughly 7,700 workers earning about \$335 million in compensation annually. The majority of the industry is centered in western and central Montana where the Stonewall project is located. Additionally, AFRC members are struggling to find needed raw materials to run their operations and keep employment levels at their current rate. The timber products provided by the Forest Service are crucial to the health of our membership and the counties and communities where they are present. 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. This viability is tied to both the volume and type of timber

products sold and the manner in which these products are permitted to be delivered from the forest to the mills.

AFRC also supported the Forest's request for a site specific, non-significant forest plan amendment for the Stonewall project that would continue to provide a one-time exemption for the following standards in the Beaver Creek elk herd unit only:

- Forest-wide Standard 3 for hiding cover on summer range (USDA Forest Service 1986, page II/17) for the Beaver Creek elk herd unit and thermal cover on winter range in the Beaver Creek herd unit;
- Forest-wide Standard 4a for open road densities during the big game hunting season (USDA Forest Service 1986, pages II/17 to 18) for the Beaver Creek elk herd unit;
- Management Area T-2 standard for thermal cover on winter range (USDA Forest Service 1986, page III/35) within the management area;
- Management Area T-2 and T-3 standards for hiding cover in timber harvest openings (USDA Forest Service 1986, pages III/35 and III/39) within the management areas within the project boundary.

Managing the dense stands of vegetation and reducing the amount of thermal cover for elk is an important need and consideration. A greater loss of cover can occur when stands are not mechanically treated but rather consumed by wildfire.

AFRC believes the Forest has done an acceptable job of analyzing the impacts to lynx in this project area following the Park Fire. The U.S. Fish and Wildlife Service issued a Biological Opinion on October 18, 2017 which is good through 2022. The Biological Assessment / Biological Opinion consultation represents the first tier of a tiered consultation framework, with each subsequent project that may affect lynx critical habitat as implemented under the Northern Rockies Lynx Management Direction being the second tier of consultation referencing back to the Biological Opinion.

Thank you for the opportunity to submit comments supporting the Stonewall project during the Objection period. AFRC respectfully requests that the resolution meeting be held as soon as possible with all objectors present. I look forward to following the implementation of this project as it moves forward.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Partin", with a stylized flourish at the end.

Tom Partin
AFRC Consultant
P.O. Box 1934
Lake Oswego, Oregon 97035