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August 10, 2022

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 provide a letter of support for the Spotted Bear Mountain Project during the 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 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 this letter to object to the Spotted Bear Mountain Project, rather we think the Project needs to move forward quickly through the implementation of Alternative B. AFRC provided scoping comments on December 10, 2021, and Draft EA comments on May 27, 2022.

**About the Project:**

The project area is located approximately 40 miles southeast of the town of Hungry Horse, MT. The purpose of the Spotted Bear Mountain Project is to move the project area towards the desired conditions defined by the 2018 Flathead National Forest Land Management Plan. The difference between the existing condition and the desired condition creates a need for

management action on the ground. The following purposes for the Spotted Bear Mountain Project compelled the need for action:

- Improve the diversity and resilience of terrestrial ecosystems and vegetation.
- Reduce tree densities and fuel loadings within the wildland-urban interface to result in less intense fire behavior near communities and facilitate safe wildland fire operations.
- Provide a mix of forest products to contribute to economic sustainability, providing jobs and income to local economies

**AFRC would like to outline the major reasons for our support along with suggested improvements during implementation**

1. AFRC would first like to thank the District for responding to many of our questions and suggestions that we provided in the Draft EA in Appendix B. That provided clarity to many of our concerns.
2. AFRC is pleased to see that the Forest will commercially harvest 747 acres and treat 293 acres non-commercially which is about 28% of the Project area. However, we continue to urge the Forest to treat as many acres as possible when analyzing an area and producing an EA or EIS. Treating more acres reduces the planning cost per acre, generates more revenues from stumpage and maximizes attainment of the purpose and need.

AFRC would like to remind the Forest that supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project including the Spotted Bear Mountain Project. AFRC has pointed out before that the “restoration” treatments that are desired on these lands cannot be implemented without a healthy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed.

Montana’s forest products industry is one of the largest components of manufacturing in the state and employs roughly 7,000 workers earning about \$300 million annually. Without the raw material sold by the Forest Service, DNRC, and private lands these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, the industry 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.

3. We are pleased to see that the District will be addressing unhealthy stands of timber through silvicultural treatments using nineteen units, alone or in combination, that will be over 40 acres. However, none of the units would exceed maximum opening sizes as

described in the forest plan. While visiting the Forest in June 2021 and seeing the conditions of similar stands we understand and support the need to create these openings.

4. The EA mentions that most vegetation in riparian management zones is upland vegetation, particularly in confined valleys and gorges. Treatments in the riparian management zones are proposed to improve tree growth, improve species composition, and reduce fuel loads in upland stands. Commercial harvest is proposed within the outer riparian management zone which AFRC strongly supports. AFRC provided lengthy comments as to why we believe treatments in the riparian areas are needed, and we are pleased to see that some work will be done in the riparian areas.
5. AFRC supports the District's analysis on old growth management. AFRC asked the District to consider wider spacing of leave trees adjacent to the old growth units. There are six treatment units (units 3, 6, 11, 14, 17, and 208) totaling 73 acres adjacent to old growth stands within the Project area. Based on the species composition of adjacent old growth stands, it is unlikely there will be substantial blowdown following treatment.

In addition to blowdown considerations, AFRC suggested the District implement wider spaced thinnings adjacent to the old growth stands to reduce the risk of fire and insects and disease. If these stands are indeed important to keep, then steps should be taken to ensure their survival.

AFRC is pleased with the District's response: "*Treatment adjacent to old-growth will reduce the risk of fire and insects and disease of those old-growth stands.*"

6. AFRC supports the Transportation Plan for the Project. Anytime a project includes road construction or reconstruction in Grizzly bear habitat it will be controversial. AFRC believes the District has done a good job of using the BMPs in planning for the transportation system. This includes approximately 0.6 miles of temporary roads that would be constructed to the minimum standards necessary for log hauling on NFS roads. All temporary roads would be rehabilitated following timber harvest activities and would cease to function as roads. Approximately 4 miles of road would be constructed and added to the NFS road system in intermittent stored service condition and made impassable to wheeled motorized vehicles. Approximately 0.9 miles of these system roads would use historical roadbeds reconstructed to the minimum standards necessary for project activities.
7. AFRC thanks the District for your response regarding the use of Designation by Prescription. We are pleased that you agreed that it might be a good option for designating the trees to be harvested and those to be retained especially in commercial thinning, seed tree, and shelterwood harvests. The goal of the Project is to remove shade tolerant species and shift towards more western larch and ponderosa pine and prescriptions can be written to accomplish this.

8. Regarding operations, AFRC commented that while the Forest is planning on all commercial logging to be done using tractor systems, we would like to remind the Forest that there are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland. The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts.

AFRC appreciated the District's response that: "*Systems are based on typical operations in the area, this does not preclude alternative systems from participating in project activities.*"

9. AFRC provided several documents related to carbon sequestration and impacts on forest management. We suggested that they should be included in the EA since the climate/carbon record is becoming very important. AFRC appreciates the response and clarification to this subject by the District which stated: "*A detailed analysis of climate change was not included in the environmental assessment because the forest scale is the most appropriate scale for analyzing these effects. Therefore, the project tiers to the detailed analysis for climate change in the forest plan final EIS, alternative B modified (USDA 2018c).*"

Thank you for the opportunity to provide a letter of support for the Spotted Bear Mountain Project during the Objection Period. AFRC looks forward to its implementation in 2023. Should there be other Objections, AFRC would like to be a part of the Resolution meeting and have the ability to voice our support for the Project.

Sincerely,



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