



VIA Electronic Mailing: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=60892>

September 28, 2022

Forest Supervisor (Reviewing Officer)
Northern Regional Office
Attn: Round Star Objection
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 support letter for the Round Star Project which is currently in 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 Round Star Project, rather we think the Proposed Alternative as described in the Draft Decision should be promptly implemented. AFRC provided scoping comments on December 21, 2021, and Draft EA comments on July 12, 2022.

About the Project:

The Round Star Project is approximately 28,300 acres, and is located northwest of the Flathead Valley, 13 miles west of Whitefish Montana. Land ownership within the project area is approximately 78 percent National Forest System (NFS) land, 15 percent private, and 7 percent State-owned lands. All proposed activities would occur on National Forest System lands. These comments are to enhance and supplement our scoping comments submitted on December 21, 2021.

The Project is being driven by differences between existing forest and other resource conditions compared to the desired conditions described in the recently adopted 2018 Flathead Forest Plan. AFRC supports the four major Purpose and Needs of the Project which include:

- Reduce tree densities and fuel loadings within the wildland-urban interface to result in less intense fire behavior near communities and improve egress access to facilitate safer wildland fire operations.
- Improve the diversity and resilience of vegetative communities.
- Contribute to continued timber production and economic sustainability.
- Enhance and expand high quality recreation opportunities in the Round Meadow Area.

The Proposed Alternative will commercially treat 6,324 acres and 2,489 acres noncommercially. There are 8,461 acres being treated in the Wildland Urban Interface.

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 response to the Draft EA in Appendix B. That provided clarity to many of our concerns.
2. AFRC wants to emphasize how important the Project is to provide wood products to the local manufacturers who provide jobs to the local communities. During our June 21 meeting, we discussed the importance of both volume of timber available for harvest long term and the economics of harvesting the timber. The proposed commercial harvest acres are listed below:

Commercial thin	3,469
Improvement cut	503
Hardwood release	52
Shelterwood	450
Seed tree	1,270
Clearcut	580
Total commercial treatment	6,324

AFRC is pleased to see that 6,324 acres of the approximate 22,000 acres of Forest Service land will be treated commercially (29% of the land). We discussed the importance of treating large amounts of acres during the EA process for economic efficiency on June 21. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present day needs but also important for future needs. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments affect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times regarding the

long-term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply.

AFRC and member companies toured the Round Star Project on September 19, of this year. Our request is that you not only manage in the younger stands, but you also manage in some of the older stands to improve forest health, reduce fuel loadings, and open the stands up for wildlife. This will also help to make the Project more economical. I am including a couple of pictures of the area, that AFRC believes need treatments.





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 landowners 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. In our comments we encouraged the Forest Service to 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 National Forest market area with a variety of skills and equipment. Developing an EA contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA 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. Though some of the proposed area may be planned for cable harvest, there may be opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. While we appreciate the language allowing ground skidding to occur on slopes over 35% if approved, we would like the Forest to allow ground-based equipment to operate on slopes up to 45%. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Tethered-assist equipment is also becoming a more viable, safe, and available option for felling and yarding on steep slopes. This equipment has shown to contribute negligible ground disturbance when compared to traditional cable systems. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. Other forests in the Region have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. It would be helpful if you would prepare your NEPA analysis documents in a manner that will facilitate this type of equipment. The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. **We urge the Tally Lake District to consider allowing this equipment to be used where appropriate on the Round Star project to mitigate implementation obstacles.**

AFRC appreciates the Forests' response to our comment: *"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. The EA does not include restrictions to operations or haul due to recreation."*

4. AFRC suggested that the use of Designation by Prescription might be a good option for designating the trees to be harvested and those to be retained especially in commercial thinning, seed tree, improvement cuts, and shelterwood harvests. Prescriptions can be written to accomplish the goal of the Project of removing shade tolerant species and shifting towards more western larch and ponderosa pine. We also encourage the District to reduce stocking in these units down to 40 sq.ft. of basal area to promote tree vigor and reduce fuels. This is especially true in lands included in the Wildland Urban Interface where fuels reduction is paramount.

Again, we appreciated the Forest's response: *"Thank you for your comment. As stated, Designation by Prescription leverages many efficiencies on the sale preparation side and is cost effective. The Flathead National Forest aims to continue to utilize DxP for these reasons and by doing so has become a leader in the region in its implementation. This being said, DxP not does fit all stands, especially those that are not homogenous, so its use will be applied where appropriate."*

5. AFRC suggested that if the Forest Service proposes to decommission, abandon, or obliterate road segments from the Round Star Project area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will give firefighters quicker and safer access to suppress any fires that are ignited.

AFRC supports the Forest's proposal on this which states: *"The project does not propose any obliteration of existing or proposed system roads. The interdisciplinary team conducted a project-level travel analysis which identified system roads needed for long term access and forest management, which were carried forward in the Round Star Project with barrier or gate closures. Roads proposed for project implementation but not needed for long term management were identified as temporary roads. Timing restrictions are included in the Round Star Project where necessary to protect resources."*

5. AFRC supports active management in riparian areas to achieve land management objectives. It has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. The Forest Plan describes the need for treatments that meet the need of multiple habitat types, and we encourage the Tally Lake District to look for ways to incorporate treatments that meet those needs.

While not totally supportive of the Forest's response, we appreciate your consideration on the subject: *"Therefore, the proposed action did not specifically identify commercial harvest in these areas for purposes of improving aquatic ecosystem health. However, if conditions change in the future, the ability to commercially harvest timber within RMZs may still be considered as a management tool to achieve desired conditions detailed in the forest plan. The proposed action seeks to find a balance of reducing fuels and improving forest health in the Outer RMZ while treatments within the Inner RMZ are specifically linked to fuels objectives."*

6. AFRC noted that the District is planning to use 71 miles of system roads for log haul. AFRC strongly supports the use of shaded fuel breaks along these identified roads to not only provide fuel breaks along ingress and egress for the WUI, but also to provide wood products for the milling infrastructure. We further recommend treating a minimum of 200 feet on each side of the roads and thinning to wide spacings again leaving only 40 sq. ft. of basal area.

AFRC appreciates the Forest's response on this issue: *"Although not specifically called shaded fuel breaks, the treatments planned along roads are intended to reduce flame length and modify potential fire behavior to make future fire management operations safer and more effective."*

Thank you for the opportunity to provide a letter of support for the Round Start Project during the Objection Period. AFRC looks forward to its implementation in 2023. Should there be any 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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