



August 1, 2023

Objection Reviewing Officer  
Northern Regional Office  
26 Fort Missoula Road  
Missoula, MT 59804

Re: Selway Saginaw Objection Letter

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council (“AFRC”) files this objection to the proposed decision for the Selway Saginaw Project. The responsible officials for this Project are the two District Rangers where this project is located, Jamie Tripp, Dillon Ranger District and Kristen Thompson, Wisdom Ranger District. The Selway Saginaw Project occurs in the Beaverhead-Deer Lodge National Forest.

**Objector**

American Forest Resource Council  
700 NE Multnomah, Suite 320  
Portland, OR 97232  
(503) 222-9505

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC represents over 50 forest product businesses and forest landowners. AFRC’s mission 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. The Selway Saginaw Project will, if properly implemented, benefit AFRC’s members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

**Objector’s Designated Representative**

Tom Partin  
921 SW Cheltenham Street  
Portland, Oregon 97239  
503-704-4644  
tpartin@amforest.org

700 N.E. Multnomah, Suite 320  
Portland, Oregon 97232  
Tel. (503) 222-9505 • Fax (503) 222-3255

## Reasons for the Objection

In our Scoping letter AFRC wrote:

AFRC is disappointed and confused by the Forest Service's decision to only treat 7,255 acres commercially, as listed in Table 1 below; especially when page 15 of the scoping document notes that "*The biggest management concern is the current spate of Mountain Pine Beetle in the project area and landscape susceptibility to an outbreak in the future.*"

The Draft Decision now indicates that the Forest will further reduce the number of commercial acres being treated that will ultimately exacerbate the risk of widespread mortality due to insect infestation. **AFRC is filing this objection in response to the Forest's decision to defer treatment of 2,417 acres of intermediate commercial harvest in stands designated as old growth. These deferrals will inhibit the Forest's ability to fully meet multiple components of the Purpose and Need.** Language from the Draft Decision: *We are also choosing to defer a decision on the 2,417 acres of intermediate commercial harvest at this time. By dropping these acres, we will not be treating old growth.*

We believe the goal of any Forest Service vegetation management project should be to meet the purpose and need to the maximum extent across as many acres of the project area as possible. The scope, primarily measured in acres treated and timber volume offered, should be the metric that indicates how well the Forest Service is meeting the purpose and need on any given project. In other words, meeting the stated purpose & need on 500 acres is inferior to meeting the stated purpose and need on 600 acres.

By not treating these acres, AFRC does not believe the Forest can fully achieve the Purpose and Need for the Project.

The Purpose and Need includes:

### 1. **Timber Management**

- a. **Lands Suitable for Timber Production:** Manage lands suitable for timber production for the growth and yield of sawtimber, crop trees, pulpwood, and other forest products, including salvage harvest.
- b. **Lands Not Suitable for Timber Production but Timber Harvest is permitted to Meet Other Resource Objectives:** Manage lands where timber harvest is allowed to protect other resource values. Resource objectives may include, but are not limited to, protection of wildland urban interface, protection of improvements aquatic system restoration, fuel reduction, wildlife habitat enhancement, fisheries habitat enhancement, range improvement and grass and shrub land maintenance. Product Utilization: Forest products would be used to provide economic benefits where project objectives, forest plan objectives, and forest plan standards can be met.

## **2. Vegetation**

- a. **Resiliency:** Reduce forest density in the large size classes of dry forest communities and some lodgepole pine communities to maintain or improve resilient forest conditions.
- b. **Grassland/Shrubland/Riparian:** Reduce conifer encroachment on 74,000 acres of riparian areas, shrublands, and grasslands.

## **3. Fire Management**

- a. **Fuels Management:** A full range of fuels management activities is available to achieve ecosystem sustainability, including economic and social components.

By dropping those 2,417 acres, the Forest is not managing to their best of ability to achieve needed timber production for the sawmills, post and pole businesses, pulpwood users and other businesses that depend on the B-D for their raw material.

The Forest is not achieving resiliency on those 2,417 acres that are being removed because the density will not be reduced in the larger size classes and no improvement to overall stand resiliency will be accomplished on the acres removed. Page 17 of the EA states that “Treatment in these stands would contribute to meeting Forest Plan resiliency goals described in the purpose and need. Namely, a reduction of density in these units is needed to decrease stand-level hazard to mountain pine beetle mortality, and landscape-level risk of widespread mountain pine beetle mortality.” Therefore, deferral of treatment in these stands will exacerbate the risk of widespread mortality and inhibit the attainment of the Purpose and Need.

The Forest will not achieve the desired fuels management reduction by deferring treatment of these stands. AFRC would like to point out that in 2021 the Trail Creek Fire burnt tens of thousands of acres on the Wisdom District. This fact alone should make the Forest want to treat as many acres of dense lodgepole as possible.

### **Resolution Requested**

AFRC requests that these 2,417 acres be included in the final decision to fully meet the Purpose and Need. The poor forest health and heavy fuels conditions found in these stands warrants treatment to reduce the risk of further forest mortality.

AFRC also requests that the Forest Service provide an explanation to support the proposed deferral of these 2,417 acres. Page 10 of the EA indicates that six units proposed for treatment in old growth stands were removed as field surveys determined they would not meet the Forest Plan Vegetation Standard for old growth after treatment. This statement implies that the remaining units in old growth stands were also field verified and determined to meet Forest Plan standards. Page 43 of the EA states that “In old growth stands, evidence suggests that intermediate harvests that thin existing trees can be an effective deterrent to mountain pine beetle infestation and associated losses.” Did the Forest Service ascertain new evidence to suggest otherwise since publication of the EA? We would like to understand what factors compelled the Forest Service to pivot so drastically from the results of the EA and the information gathered during field surveys. We believe that the NEPA process exists primarily to foster well-informed decisions through robust environmental analysis. Section 1505.2(b) of the current NEPA regulations

requires the decision-maker to base his or her decision on analyses in the final assessment. This decision appears to reject its own analysis and instead propose actions not supported by the EA.

**Request for Resolution Meeting**

Pursuant to 36 C.F.R. § 218.11, the objectors request a meeting with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held as soon as possible with all objectors present. AFRC believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Tom Partin, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, slightly slanted style.

Travis Joseph  
President