F.H. STOLTZE LAND & LUMBER COMPANY

Lumber Manufacturers

PO Box 1429 Columbia Falls, MT 59912
Phone (406) 892-7005 Fax (406) 892-1612
www.stoltzelumber.com

SUSTAINABLE FORESTRY INITIATIVE
Good for you. Good for our forests.℠
Member Company

WOOD WATER RECREATION WILDLIFE CERTIFIED TREE FARM
Member Since 1966

MONTANA Wood Products ASSOCIATION
Charter Member

September 29th,2023

Gary Blazejewski,
Project Leader
Hungry Horse Ranger Station
P.O. Box 190340
Hungry Horse, MT 59919

Dear Gary:

On behalf of F.H. Stoltze Land & Lumber Co., thank you for allowing the opportunity to provide comments on the Draft EA for Dry Riverside project.

F.H. Stoltze Land & Lumber Co., is a family-owned sawmill that operates in northwest Montana. We also have about 40,000 acres of land scattered all throughout northwest Montana. F.H. Stoltze also has an active timber sale adject to the project that we purchased in 2019 called Betty Baptiste.

The Dry Riverside Project is located within the Hungry Horse and Spotted Bear Ranger Districts of the Flathead National Forest. The project area is approximately 54,975acres and is located southeast of the town of Hungry Horse, within Flathead County. Approximately 19 percent (10,503 acres) of the project area is located within designated Wilderness. There are no wild and scenic river corridors present within the project area. Approximately 31 percent 17,215 acres of the project area is located within inventoried roadless area (IRA). There are 13,537 acres classified as general forest moderate intensity vegetation management and 2,120 acres as low intensity management. The Forest is also planning on doing some non-commercial work in the IRA.

F.H. Stoltze supports this project and submitted scoping comments on December 15th, 2022.

There have been some drastic changes across the landscape area of this project since our last comments. During the summer of 2023 multiple fires started across the region including the Ridge fire and the Spotted bear complex. These fires only enhance the need and urgency for active management on the Spotted Bear and Hungry Horse Ranger Districts. The Ridge fire took place within an active timber sale area that Stoltze purchased. You can see in the attached photo below the effects that the thinned area had on the fire. The thinned area slowed the fires growth and reduced it to a ground fire which allowed many of the overstory trees to survive. The thinning unit also allowed for firefighter access.

Current conditions on the landscape shows that much of the Project area is dominated by 50-year-old plus western larch that needs to be thinned. Past stand replacement fires or commercial harvesting have led to uniformed aged stands of other species that also need thinning. Finally, in some of the higher elevations those stands have not experienced disturbance since the early 1900s and are mature, mixed species stands with understories of Engelmann spruce and subalpine fir. These stands are dense and slow growing with large, western white pine and western larch remnant trees throughout. These stands are in danger of being the next catastrophic fire on the district.

Based on these conditions, F.H. Stoltze supports the Purpose and Need for this Project as outlined in the scoping document—this includes:

Improve the diversity and resilience of terrestrial ecosystems and vegetation
Remove, reduce, or rearrange fuels to promote a more fire resilient forest and limit impacts to natural resources, should a wildfire occur.
Provide a mix of forest products to contribute to economic sustainability, providing jobs and income to local economies.

F.H. Stoltze supports implementation of the project and we are pleased that one of the Purpose and Needs is to provide a mix of forest products to contribute to economic

sustainability, providing jobs and income to local economies. To support this, we encourage the Forest Service to treat as many acres as practical when implementing this EA. The expense of these planning documents is high, and we feel it is important to get as much work done using this document. Treating more acres also adds to the timber volume that will be produced. The National Forests in Montana are very important for providing the raw materials that sawmills within the State need to operate. The timber products provided by the Forest Service are crucial to the health of our membership. 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. Specifically, studies in Montana have shown that 12-15 direct and indirect jobs are created for every one million board feet of timber harvested. 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 way these products are permitted to be delivered from the forest to the mills.

Additionally, 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. Much of the industry is centered in western Montana, and this Project is crucial to the infrastructure located in and around the Flathead National Forest.

Commercial thinning is planned on 4,189 acres with seed tree harvest planned on 372 acres, and 55 acres of shelterwood. F.H. Stoltze encourages the District to thin to 40 sq. ft. of basal area in the commercial thinning areas. This would be consistent with the direction in the document which states: "leave tree selection would favor western white pine, western larch, ponderosa pine and Douglas-fir. These trees would then have more growing space, light, nutrients, and water increasing their insect, disease, and fire tolerance. Commercial thinning would also achieve fuels reduction objectives by reducing tree densities."

F.H Stoltze does support the planned work in the IRAs. This would include 2,257 acres of prescribed burning and 714 acres of whitebark pine restoration. The objective of whitebark pine restoration is to increase genetic diversity, increase white pine blister rust resistance and increase proportion of whitebark pine across the landscape. This will be accomplished by either direct seeding or planting of rust resistant whitebark pine seedlings. Seedlings may be transported by stock or helicopter. Prescribed burns will be used in the IRAs also to create forage for ungulates and to help regenerate white bark pine.

F.H. Stotlze supports the district managing in the riparian zones. Treatments in the riparian management zones are proposed to increase species diversity, protect large individual remnant western larch and western white pine, and to promote larger size classes. Noncommercial vegetation treatments are proposed through hand treatment

within the inner riparian management zone. Commercial harvest is proposed within the outer riparian management zone.

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. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives.

The methods of tree removal for units with commercial products would be a combination of ground-based (tractor; tracked and or rubber-tired equipment) and skyline mechanized harvest. A combination of whole tree yarding and cut-to-length (CTL) methods are anticipated. Whole tree yarding may be used to remove forest fuels from the stand toa landing pile and excavator piling may be used to pile fuels. Mechanized harvest methods would occur across approximately 4,616 acres.

F.H. Stoltze would like to remind the Forest that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The decommissioning of roads in the Dry Riverside Project area likely represents permanent removal of these roads and the deferral of management of those forest stands that they provide access to. The land base covered in the Dry Riverside Project area is to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

This project is not only important for forest health, but also to help protect local communities from wildfire, provide essential forest products, create jobs, and support the local area economically.

Thank you for the opportunity to provide Draft EA comments for the Dry Riverside Project. I look forward to following the project through implementation.

Sincerely,

Matthew Bishop
F.H. Stoltze Resource Forester