



VIA Email: <https://www.fs.usda.gov/project/?project=63658>

December 10, 2024

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 an Objection letter of support for the Cyclone Bill Project.

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.

The Cyclone Bill project area is approximately 41,080 acres and located in the Tally Lake Ranger District of the Flathead National Forest. It is within Flathead County, Montana, and is located approximately 13 miles west of Whitefish, Montana. Land ownership within the project area is approximately 35 percent National Forest System (NFS) land, 30 percent private timber company lands, 20 percent other private lands, and 10 percent State-owned lands. With this background, AFRC's previous comments and this support letter will be focusing on the treatments being proposed on the 14,400 acres of National Forest lands.

AFRC is not writing to object to this Project, rather we are submitting this letter to encourage the Forest to move quickly to Project implementation. AFRC staff and members are very familiar with the project area and the current forest conditions. AFRC submitted scoping comments on March 14, 2023, and Draft EA comments on September 24, 2024 where we voiced our support for treatments proposed in this project. We have had several

opportunities to visit the project area to observe the existing forest conditions. We are also familiar with other projects in the vicinity, including the Roundstar Project on the Tally Lake Ranger District.

Why is AFRC Supporting the Project?

1. **The 9,192 acres of commercial treatment are needed to meet the project's purpose & need.** Although we are disappointed that the proposed commercial treatment acres were reduced from the 9,694 acres originally proposed in scoping, those 9,192 acres remain in need of treatment. These treatments and the timber products they generate are very important for the timber industry and the communities where they are located. 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. There are several sawmills, post and pole, and smaller wood operations in the Project's vicinity. 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. Studies in Montana show that for every million board feet harvested 12-15 direct and indirect jobs are created.
2. **Treatments needed and planned in the riparian areas.** AFRC continues to support active management proposed in riparian management zones to improve tree growth and species composition, and to reduce fuel loads in upland stands using both commercial and noncommercial treatments. We remind the Forest that 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 table below outlines the treatments in the riparian areas.

Table 5. Potential vegetation treatments within RMZs

Treatment	Outer RMZ acres* within Unit	Inner RMZ acres* within Unit
Improvement cut	21	0
Even-aged regeneration	77	0
Thin from below	68	4
Commercial thin	81	0
Precommercial thin	11	2
Prescribed burn	54	6
Total	312	12

The Draft EA 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. 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 that the Forest Plan mandates should be considered.

3. **AFRC supports and appreciates the detailed work put into analyzing the impacts that the Cyclone Bill Project will have on Threatened Species.** The impacts to wolverine, Canada lynx, and Grizzly bear are all thoroughly analyzed and disclosed on pages 60-86 in the Draft EA. The details provide a clear rationale for conducting the treatments that will yield long-term benefits to those species. Some highlights from the analysis includes:
 - a. There are no recent observations of wolverine within the analysis area. The project would not occur in wolverine primary habitats, nor maternal denning habitats. Disturbance to prey species in primary habitats would not occur **because there is no primary habitat within the analysis area, and there would be little effect on amounts of potential prey (carrion) under the proposed activities.**
 - b. Adult mortality for Canada lynx includes starvation in winter and early spring, predation by lions during non-snow periods, and human conflict (e.g. accidental trapping or malicious shooting) (Squires et al. 2010). Since the Cyclone Bill project would result in a relatively small reduction to foraging habitat and no net increase in public motorized access, the **project is not expected to increase the probability of lynx mortality.**
 - c. Mortality rates for grizzly bears (including the project area) have provided stable to increasing populations in the ecosystem. Combined with the project activities with associated design criteria, **the project is consistent with conservation and recovery of the grizzly bear population.**
4. **AFRC supports the restoration work proposed in stands classified as old growth.** Several stands classified as old growth would be treated commercially

(improvement cuts) and noncommercially. These treatments will likely increase the resistance and resilience of old growth forests to disturbances or stressors such as high severity fire which may have negative impacts on old growth characteristics.

5. **AFRC supports the logging plan.** AFRC appreciates the flexibility outlined in the proposed harvest methods: *“Tree removal in units with commercial products would include ground-based mechanized harvest and cable systems, or a combination of those systems. Mechanized falling, whole tree yarding may be used to remove forest fuels from the stand to a landing pile and excavator piling may be used to pile activity generated and natural fuels.”*

To build on this we would like the District to recognize that one of the primary issues affecting the ability of our members to feasibly deliver logs to their mills is 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 contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like 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 market area with a variety of skills and equipment. Developing an EA and 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 and 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 proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. 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. Please prepare your NEPA analysis documents in a manner that will facilitate flexibility in the use of various types of equipment. AFRC believes that with some of the lighter touch logging methods as mentioned above, the impacts could even be less than those analyzed. Please allow ground-based equipment to operate on slopes over 45% where and when possible.

Finally, AFRC would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging

community has limited operating time at best, and further reductions such as these only makes surviving in the logging business that much more difficult.

6. **AFRC agrees with and supports the Carbon analysis in the EA.** AFRC believes the entire carbon analysis shows the benefits of active management and the detrimental effects to carbon and greenhouse gases caused by wildfire and insects and disease. The following information was in the carbon analysis in the Project Exhibits. *By increasing forest resilience to drought, wildfire, altered fire regimes, and insects and disease, this project helps ensure the continued delivery of ecosystem services, including carbon storage and forest products. This project's purpose and need aligns to the Agency's Climate Adaptation Plan which identifies key risks to the agency's mission and overarching adaptive actions to reduce these risks (U.S. Department of Agriculture 2022). The Cyclone Bill proposed action would implement activities that contribute to Adaptation Actions 1, 2, and 4, specifically addressing focus areas 1.c, 1.d, 2.c, and 4.a (U.S. Department of Agriculture 2022):*
- a. *1.c. Practice safe and effective fire response in a changing climate,*
 - b. *1.d. Prepare for more post-fire landscapes,*
 - c. *2.c. Help ecosystems adapt to intensifying disturbances and extreme events, and*
 - d. *4.a. Help ensure the continued delivery of ecosystem services.*

Projects such as Cyclone Bill and the carbon analysis for the Flathead National Forest are only one part of the many actions that the USDA Forest Service is doing regarding climate change. The Forest Service is working to ensure that our national forests and grasslands are prepared for upcoming changes in climate through adaptation and mitigation.

Thank you for the opportunity to provide a letter of support for the Cyclone Bill Project and we look forward to its implementation in FY'25.

Sincerely,



Tom Partin
AFRC Consultant
921 SW Cheltenham Street
Portland, Oregon 97239