



F.H. STOLTZE LAND & LUMBER COMPANY

Lumber Manufacturers

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February 18th, 2025

Rob Davies, District Ranger
Hungry Horse Ranger District
P.O. Box 190340
10 Hungry Horse Drive
Hungry Horse, MT 59919



Good for you. Good for our forests.™

Member Company

Dear Rob:

Please accept the following scoping comments on the West Reservoir project on behalf of F.H. Stoltze Land & Lumber Co.

F.H. Stoltze Land & Lumber Co., is a family-owned sawmill that operates in northwest Montana. We also own about 38,000 acres of land scattered all throughout northwest Montana. As a local lumber company committed to sustainable forestry practices and the economic well-being of our community, we are writing to express our support for the proposed West Reservoir Project. We believe this initiative offers several benefits that align with our values and objectives.



Member Since 1966

The West Reservoir project area is approximately 129,000 acres in size and located completely on National Forest System Lands southwest of the town of Hungry Horse, MT, along the west side of the Hungry Horse Reservoir. The project is on both the Hungry Horse and Spotted Bear Ranger Districts. F.H. Stoltze is very familiar with the conditions in this project since we have visited the area on several occasions. We have also purchase and harvest timber in areas all along hungry horse reservoir. While the project area is large, there is a lot of land designated as recommended wilderness, inventoried roadless, eligible wild and scenic river, and backcountry use. Commercial treatments are only proposed on 2,001 acres of the project area and noncommercial treatments are proposed on 6,189 acres.



Charter Member

F.H. Stoltze is disappointed in the size of the project. While the project area is 129,000 acres in size, only 2,001 acres are proposed for commercial treatment. That means that only 1.55% of the project area is being commercially treated. The majority of the project area is in poor forest health with heavy fuel loads on the forest floor. With these conditions, some of the proposed non-commercial treatments such as prescribed burning could lead to unwanted fire behavior such as crown fires and burning more acres than anticipated.

F.H. Stoltze supports the purpose and need of the project but we feel that these comments listed below may help better the project from both a forest health perspective and also a wildlife habitat perspective.

1. We support the proposed logging plan which states: *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 to a landing pile and excavator piling may be used to pile fuels.*
2. Stoltze believes that the size of commercial treatments could be increased from 2001 acres. The proposed project area is heavily used by the public for recreation year-round. Commercial treatment of more acres would not only help protect the area from wildfire but it would also increase public safety in the area by removing dead and dying trees. It would also increase
3. A good portion of the proposed commercial harvest is to be completed by commercial thinning (1,593 acres). To effectively reduce the fuel loadings and to improve the vigor of leave trees, Stoltze recommends thinning these areas to basal area of 40 sq.ft. per acre. This not only achieves the goals stated above, but it will also increase the commercial sawlog volume being removed. The document currently recommends leaving 60-120 medium sized trees per acre and 30-60% canopy cover. We believe this will not accomplish your stated goal, and this is especially true in lands included in the Wildland Urban Interface where fuels reduction is paramount.
4. Stoltze believes 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. DxP can be a useful tool for the USFS especially with ongoing workforce shortages. Stoltze would like to remind the USFS that DxP prescriptions can be variable to help adapt to changing forest conditions during the planning process.
5. Stoltze believes there is opportunity to enhance recreational infrastructure. Post-project or during the project. Such as improving trails, adding in more campsites, and constructing new trails, which can benefit both the public and local businesses.

Stoltze also would like to remind you of the economic benefit that these projects provide. Not only to the USFS but also to the local economy and communities. 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 and post and pole and smaller wood operations in the project vicinity. The timber products provided by the Forest Service are crucial to the health of our membership and the counties and communities where they are present. F.H. Stoltze relies heavily on the raw materials sold by the USFS and without we would not be able to provide jobs to the local community as well as wood products to the citizens of this country.

Thank you for the opportunity to provide scoping comments for the West Reservoir Project. I look forward to commenting on the Draft EA when it is out for comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Bishop". The signature is stylized with a large, looped "B" and a trailing "P".

Matthew Bishop
F.H. Stoltze Resource Forester