October 5, 2026

Jarel Kurtz, Acting Lincoln District Ranger
1569 Highway 200
Lincoln, MT 59639

In Reply To: Ogden Poorman project

Dear Mr. Kurtz:

American Forest Resource Council (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. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Lincoln Ranger District, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC is pleased to see the Lincoln Ranger District proposing vegetation management that will likely provide useful timber products to our membership by utilizing the authorities under Section 603 of the Healthy Forest Restoration Act to streamline the analysis of the project. 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. A timber supply that is managed in accordance with the principles of sustained yield are also critical to our membership as long-term timber supply is equally important as near-term timber supply. Although the primary purpose of this project does not directly address sustained-yield timber management, the treatments designed to increase forest resiliency by harvesting commercial timber products, if implemented correctly, will help maintain a viable forest ecosystem capable of growing and sustaining timber products for future needs.

We are pleased to see the inclusion of regeneration harvest prescriptions in the project as a means to mitigate the insect and disease damage that is widespread across the project area. These silvicultural treatments and subsequent reforestation should improve the overall health of the newly established stand, as well as providing for future timber products through a healthy and robust stand of trees.

Based on the information in the scoping notice, it is likely that much of the timber planned for harvest is dead or dying. As such, standard utilization specifications used on green Forest Service timber sales will not likely be appropriate for the salvage sales generated from this CE. Due to the damaged nature of the timber products being proposed for harvest, there will be an unusually high level of uncertainty by the Forest Service and prospective purchasers of the actual value of those products on the stump prior to harvest. This uncertainty is exacerbated by the fact that additional time for wood deterioration will elapse between the time of purchase and the time of harvest. Therefore, the Forest Service should be developing minimum removal requirements and utilization specifications that align with this uncertainly. Purchasers will recover as much value from these damaged products as possible. Requiring them to recover value that is not available will reduce the likelihood that these sales will successfully sell.

The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. Tethered-assist logging is becoming a more economical, safe, and available method of yarding on steep slopes throughout the region. 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. Some Forests in the west have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. We urge the Forest to consider allowing this equipment to be used where appropriate on this project to mitigate implementation obstacles.

Constructing forest roads is essential if active management is desired, and we are pleased that the Forest Service is proposing the roads that are needed to access and treat as much as the project area as possible in an economically feasible way. Proper road design and layout should pose little to no negative impacts on water quality or slope stability. Another factor contributing to timber sale economic viability is rock source for required and/or optional road work. Costs associated with hauling rock long distances have been escalating in recent years and often represent a significant cost in timber sale implementation for our members. Quarry development (new or existing) on USFS land in close proximity to the project area should be considered if available. The value of having a good rock source close to future timber sales should be strongly considered by the Lincoln District.

AFRC is happy to be involved in the planning and decision-making process for the Ogden Poorman CE. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or ageissler@amforest.org.

Sincerely,



Andy Geissler
Director of Forest Policy and Monitoring
American Forest Resource Council