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Comments: Please accept these comments for the Custer Gallatin Forest Plan Revision on behalf of the American Forest Resource Council and our membership.

The American Forest Resource Council (AFRC) submits the following comments on the proposed revised Land and Resources Management Plan for the Custer-Gallatin National Forest.

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. AFRC members, including Sun Mountain Lumber, Idaho Forest Group, Roseburg Forest Products, Montana Logging Association, and Powell County rely on wood from the Custer-Gallatin National Forest to keep their mills operating and people employed.

Many of AFRC's members depend on the lands covered by the Draft Plan and DEIS to supply their manufacturing facilities. The continued existence of the industrial infrastructure and the social and economic well-being of communities depend upon wise stewardship of these lands.

General Comments

The purpose of the action is to revise the 1987 forest plan for the Custer and Gallatin National Forests which encompasses 3,039,273 million acres in southern Montana and the northwest corner of South Dakota. The Custer Gallatin Forest Plan revision effort was publicly launched in January 2016, and our members and interested parties have been participating in the Forest Plan Revision process since that time. AFRC's comments will focus on several major areas where we believe the Draft EIS is deficient and additional work is needed. These include: the proposed

plan (Plan) does not address the needs of the forest for increased restoration; the Plan does not provide enough timber volume to support industry infrastructure, and ensure community stability; and the Plan improperly limits management due to budget considerations.

I. The Plan does not provide an adequate range of Alternatives to address the needs of the landscape for increased restoration.

The adoption of a new Forest Plan is not simply a matter of updating the old plan, but rather it involves looking at all of the conditions and issues that have impacted the Forest during the past 32 years since the current plans were adopted. In the case of the Custer Gallatin, these changes have been very significant and demand special

considerations that AFRC believes are not thoroughly addressed in the new Plan. For example, the Custer Gallatin National Forest consists of two individual proclaimed national forests: the Custer National Forest and the Gallatin National Forest. In 2014 the two Forests were combined to be administratively managed as one national forest.

AFRC supports Alternative E. Alternative E was developed to address comments and themes of higher human presence and use of the national forest, additional recreation emphasis areas, increasing timber production from National Forest System lands, additional motorized and mechanized recreation opportunities, and not including any recommended wilderness areas.

Alternative E designates the most manageable lands[mdash]604,502 acres of Forest suitable for timber production and 608,056 acres of Forested acres unsuitable for timber production but where timber harvest may occur for other purposes. This is a total of 1,212,558 acres.

AFRC does not believe an adequate Alternative has been presented to address the needs of the Forest. First of all, Table 11 points out that since 1980 approximately 809,759 acres (or about 26%) of the Custer Gallatin National Forest land base has been burned by wildfire. Of this, about 195,399 acres burned in areas considered tentatively suitable for timber production in the 1987 forest plans, representing about 31% of the tentatively suitable base.

Unfortunately, the Forest is only proposing under Objectives (FW-OBJ-TIM- 03), in Alternative E:

Annually complete vegetation management treatments (such as, timber harvest, planned ignitions, thinning, planting) on an average of 5,000 acres of the Custer

Gallatin, measured on a decadal basis, to maintain or move towards achieving desired conditions for forest, deciduous woodland, shrubland and grassland ecosystems (this objective includes the acres outlined in FWOBJ-FIRE-01).

Since there is a total of 1,212,558 acres of suitable timber land and lands that could be managed for other Resource improvements[mdash]it would take the Forest 242 years to cover these lands to do needed stand improvements and fuels reduction!

II. The Plan inappropriately ties timber harvest levels to current budgets. Further compounding the problem of getting needed management and increasing the pace and scale of restoration, the Plan considers the current fiscal budget that the Custer-Gallatin receives as the management level for the life of the Plan. This severely handicaps management opportunities and will fail to bring resource needs into balance.

AFRC believes it is both illegal, and not meeting the needs of the Forest by tying the projected wood sale quantity and the projected timber sale quantity to current budgets as depicted in Table 16 above. The Forest proposes that both be based on reasonable expectations about the fiscal capability and organizational capacity to achieve the desired conditions and objectives in the revised plan for the planning period. As such, calculation of these volume estimates are sensitive to a number of important assumptions including future budget trends, future markets for timber products, efficiency in planning and implementation, and the timing and locations of large disturbance events. AFRC believes that this severely limits future management opportunities and taints the current needs of the Forest and those who depend on resources from the Forest.

AFRC acknowledges that the 2012 Planning Rule requires the responsible official to ensure that plan content is within the [ldquo]fiscal capability[rdquo] of the unit. 36 C.F.R. [sect] 219.1(g). [ldquo]Fiscal

capability[rdquo] is not defined in the Rule or elsewhere. The 2012 Rule also states that [ldquo]objectives should be based on reasonably foreseeable budgets.[rdquo] 36 C.F.R. [sect] 219.7(e)(1)(ii). To the extent that budget leads the Forest to impose a limit on future timber production that is not tied to the capability of the land, it is violating NFMA, the MUSYA, and the Organic Act. The Plan should

make clear that any figures tied to budget are merely non-binding projections rather than

restrictions on future management.

III. AFRC believes the Plan does not consider the needs of the existing sawmilling infrastructure. The 3.039 million-acre Custer-Gallatin National Forest contributes to the local economy and social conditions in a variety of ways. The Forest is located in several Montana and South Dakota Counties. These contributions include the supply of products, services and uses, as well as directly hiring employees and spending budgetary dollars. These activities support jobs and income in each of the Forest[rsquo]s socio-economic impact zones. At best, Alternative E (the

Alternative with the highest timber output) under Objectives (FW-OBJ-TIM) would offer wood products (including fuelwood, biomass, and other volumes that do not meet timber product utilization standards) for sale at an average annual projected wood sale quantity of 5.34 million cubic feet (24.5 million board feet), measured on a decadal basis on suitable timber base lands.

Further Standards (FW-STD-TIM) 07 allows the quantity of timber that may be sold per decade from lands both suitable and not suitable for timber production shall not exceed the sustained yield limit 8.08 million cubic feet average annual volume (approximately 38 million board feet) with the exception of salvage or sanitation cutting of trees that are damaged by fire, windthrow, or other disturbance or to manage insect infestation or disease spread. Salvage harvest of such trees may be harvested above the sustained yield limit, where such harvest is consistent with desired conditions for terrestrial and aquatic ecosystems.

AFRC strongly believes that having these volume limitations in the proposed Plan severely impacts that volume of sawlogs that the Forest can sell and will not support the sawmills in the local area long-term. Currently, Montana's forest products industry is one of the largest components of manufacturing in the state and employs roughly 7,700 workers earning about

\$335 million in compensation annually. AFRC members are struggling to find needed raw materials to run their operations and keep employment levels at their current rate.

IV. AFRC is very concerned that the Plan totally ignores the threat from wildfire to values at risk and the increase in the number of acres which will be burned by wildfires in the future. Hazardous fuels mitigation needs to be prioritized to reduce fire behavior adjacent to values at risk. Objectives (FW-OBJ-FIRE) 02 states that Natural unplanned wildfire occurs on a minimum of 375,000 acres per decade, as conditions allow, in all vegetation types. However, none of the Alternatives treat enough acres (4-7,000 acres per year depending on the alternative) for hazardous fuels mitigation to make a difference. The Forest needs to make wildfire more of a concern and increase funds for wildfire mitigation efforts than are currently addressed in the Plan. This issue becomes especially important given the amount of recreation and visitors that take place on the Forest each year.

V. AFRC does not believe that the DEIS meets the intent of the Multiple-Use Sustained-Yield Act of 1960 (MUSYA).

The MUSYA directs the Secretary of Agriculture to [ldquo]develop and administer the renewable surface resources of the national forests for multiple use and sustained yield of the several products and services obtained therefrom.[rdquo] The MUSYA also defines [ldquo]sustained yield of the

several products and services[rdquo] as [ldquo]the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the national forests without impairment of the productivity of the land.[rdquo]

The Timber section of the DEIS (3.15.1) on page 629 only identifies a [ldquo]sustained-yield limit.[rdquo]

The PRISM models that were run for each alternative only calculated this [ldquo]limit.[rdquo] This approach does not satisfy the intent and direction from MUSYA, as this Act requires the Secretary to develop and administer timber resources for achievement and maintenance of regular outputs. Simply calculating an upper limit for sustained-yield does not ensure that the Forest will [ldquo]achieve and maintain[rdquo] regular outputs. The DEIS must identify and explain how the Plan will ensure achievement and maintenance of regular outputs.

Furthermore, the DEIS is clear in that the PRISM model was run to [ldquo]move vegetation towards desired conditions.[rdquo] The DEIS clearly describes what the desired condition is on page 130 as the following: [ldquo]the desired conditions for terrestrial vegetation on the Custer Gallatin National Forest are characterized by increases in large trees and large forest size classes; more open forest densities; vigorous non-forested plant

communities; increasing early-seral shade tolerant species; and maintaining the full suite of native biodiversity on the landscape.[rdquo] Nowhere did the DEIS include a sustained-yield of timber as a [ldquo]desired condition.[rdquo] Therefore, the PRISM model and its volume outputs are not based on sustained yield and the subsequent Projected Timber Sale Quantities (PTSQs) are likely inconsistent with MUSYA.

1. The Plan is invalid where it relies on unlawful portions of the 2012 Planning Rule. The 2012 Planning Rule (Rule) violates the Organic Act, NFMA, and MUSYA in several respects. Among these violations, the Rule establishes [ldquo]ecological sustainability[rdquo] as an

overriding objective of forest management, through the maintenance of [ldquo]ecological integrity[rdquo] and [ldquo]diversity of ecosystems.[rdquo] 36 C.F.R. [sect] 219.8(a). This violates the management mandates of the Organic Act, 16 U.S.C. [sect] 475, the MUSYA, 16 U.S.C. [sect] 528, and NFMA, 16 U.S.C. [sect] 1604(e). The Rule also contains an improper requirement to provide [ldquo]ecosystem services.[rdquo] 36

C.F.R. [sect][sect] 219.10, 219.10(a). The ecosystem services requirement again violates the Organic Act, MUSYA, and NFMA.

Section 219.3 of the Rule imposes a [ldquo]best available science[rdquo] use requirement which unlawfully limits the information on which forest planning decisions can be based. This violates the analysis requirements in NFMA sections 1604(b) and 1610. The Rule omits, and the Plans accordingly fail to include, provisions for increasing harvest levels pursuant to 16 U.S.C. [sect] 1604(g)(3)(D). Finally, the Rule violates NFMA section 1604(k) because it does not allow salvage or sanitation harvest as provided by the statute. 36 C.F.R. [sect] 219.11(d).

The Plan violates the Organic Act, MUSYA, and NFMA where it relies on a Planning Rule that violates those statutes.

Thank you for the opportunity to provide comments on the Custer Gallatin Draft Revised Forest Plan. I look forward to working with the Forest as the Plan becomes implemented.