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Organization: American Forests Resource Council

Title:

Comments: VIA Email: appeals-northern-regional-office@usda.gov November 10, 2020

Objection Reviewing Officer USDA Forest Service Northern Region

26 Fort Missoula Road Missoula, MT 59804

Re: Black Ram Objection Letter

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council ("AFRC") files this objection to the proposed decision for the Black Ram Project. The responsible official is Kirsten Kaiser. The Black Ram Project occurs on the Kootenai National Forest.

Objector

American Forest Resource Council 700 NE Multnomah, Suite 320

Portland, OR 97232

(503) 222-9505

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. The Black Ram Project will, if properly implemented, benefit AFRC's members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

Objector's Designated Representative:

Tom Partin

921 SW Cheltenham Street Portland, Oregon 97239

503-704-4644

tpartin@amforest.org

Reasons for the Objection

The content of this objection below is based upon the prior specific written comments submitted by AFRC. Specifically, AFRC provided scoping comments for the Black Ram Project on August 10, 2018 and Draft EA

comments on July 29, 2019 which are hereby incorporated by reference.

1. Alternative 2 did not meet the Purpose and Needs of the Project to their fullest extent.

The Purpose and Need of the project as it appears in the Final EA includes:

[middot] Provide forest products that contribute to the sustainable supply of timber products from National Forest System Lands.

[middot] Reduce the potential for high intensity wildfire while promoting desirable fire behavior characteristics and fuel conditions in the Wildland Urban Interface (WUI) and other areas with values at risk.

[middot] Maintain or improve watershed conditions in order to provide water quantity, water quality, stream channel conditions, and native aquatic species habitat that support ecological functions and beneficial uses.

[middot] Improve big game winter range conditions and promote forage opportunities.

[middot] Maintain and improve the recreation opportunities in the project area.

AFRC does not believe the Forest can accomplish the Purpose and Needs for this project by only mechanically treating 5.4% of the project area. Specifically, the need to contribute to the sustainable supply of timber products from National Forest lands. We remain disappointed that of the 72,683 acres that could be available for commercial harvest and management, the Forest has chosen Alternative 2, which only mechanically treats 3,904 acres or 5.4% of the land base.

AFRC would like to remind the Forest that the National Forests in Montana are very important for providing the raw materials that sawmills within the state need to operate since so much of the Forests are owned by the Forest Service. 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 annually. The majority of the industry is centered in western Montana where the project is located. 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. 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

AFRC does not believe the Forest is doing an adequate job of reducing fuels and fire risk in the WUI.

The Chart above shows only 4,368 acres being treated in the WUI. Alternative 2 does not meet the purpose and needs of this project by treating so few acres especially considering the private property and residences along the Yak Highway 508.

AFRC does not believe the Forest can achieve the desired goals for wildlife, which includes improving big game winter range conditions and promoting forage opportunities. Much of the project area is in lower elevation that is big game winter range. Treating only 5.4% of the project area will not accomplish this goal.

2. AFRC believes it will not be economically feasible to put 34 miles of road into storage and decommissioning 3 miles of road by proposed methods.

AFRC does not support the decommissioning of roads using the Level 5 technique which completely eliminates the roadbed by restoring natural condition and slopes with culverts removed. This is too cost prohibitive. AFRC will support putting roads into storage if they are not needed in the short-term for forest management needs, fire suppression, recreation, etc. and supports putting roads into storage by using low cost means such as traffic barriers, berms, or other barricade methods.

#### Resolution Requested

1. AFRC requests that the Forest reconsider all treatable acres in the project area and increase the acres that are mechanically treated. This will help the economics of the project, the volume of timber harvested for sawmills, forage, and the retained receipts coming from the project to help improve other resources.

2. AFRC requests that more treatments are done in the WUI to reduce fuel loadings to prevent damage to private property and to save lives.

3. AFRC requests that more acres be treated to improve big game winter range conditions and promote forage opportunities.

4. AFRC requests the Forest put roads into storage by using low cost means such as traffic barriers, berms, or other barricade methods, and not by using the Level 5 technique which is completely eliminating the roadbed by restoring natural condition and slopes with culverts removed.

#### Request for Resolution Meeting

Pursuant to 36 C.F.R. [sect] 218.11, the objectors request a meeting with the reviewing officer to discuss the issues raised in this objection and potential resolution.

In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held as soon as possible with all objectors present. AFRC believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. [sect] 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Tom Partin, at the address and phone number

shown above, to arrange a date for the resolution meeting.

Sincerely,

Travis Joseph President