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First name: Cameron
Last name: Wohlschlegel
Organization: F.H. Stoltze Land & Lumber
Title:
Comments: August 17, 2022

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT59804

Dear Reviewing Officer:

On behalf of F.H. Stoltze Land & Lumber Co., thank you for the opportunity to provide a letter of support for the Spotted Bear Mountain Project during the Objection Period.

Stoltze is not writing this letter to Object to the Spotted Bear Mountain Project, rather we think the Project needs to quickly move forward using Alternative B. Stoltze provided scoping comments on December 1, 2021, and Draft EA comments on May 9, 2022.

Stoltze would like to outline the major reasons for our support along with suggested improvements during implementation

1. We are pleased to see that the Forest is will commercially harvest 747 acres and treat 293 acres non-commercially which is about 28% of the Project area. However, we continue to urge the Forest to treat as many acres as possible when analyzing an area and producing an EA or EIS. Treating more acres reduces the planning cost per acre, generates more revenues from stumpage and maximizes attainment of the purpose and need.

Stoltze would like to remind the Forest that supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project including the Spotted Bear Mountain Project. 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. Without the raw material sold by the Forest Service, DNRC, and private lands these mills would be unable to produce the amount of wood products that the citizens of this country demand.

2. We are pleased to see that because of the need to treat unhealthy stands of timber and the sale area being in the WUI, the District will be accomplishing the silvicultural treatments using nineteen units, alone or in combination, that will be over 40 acres. However, none of the units would exceed maximum opening sizes at implementation in the forest plan. We understand and support the need to create these openings.

3. The EA mentions that most vegetation in riparian management zones is upland vegetation, particularly in confined valleys and gorges. Treatments in the riparian management zones are proposed to improve tree growth, improve species composition, and reduce fuel loads in upland stands. Commercial harvest is proposed within the outer riparian management zone which Stoltze strongly supports.

4. Stoltze supports the District's analysis on old growth and how to manage old growth. Stoltze asked that the

District to consider wider spacing of leave trees adjacent to the old growth units. The District found that there are 73 acres within the Project area. There are six treatment units (units 3, 6, 11, 14, 17, and 208) adjacent to old growth stands within the project area.

5. Stoltze is pleased to see that designation by prescription (DxP) might be a good option for designating the trees to be harvested and those to be retained especially in commercial thinning, seed tree, and shelterwood harvests. Stoltze has worked on many USFS timber sales that have used DxP and it has been a great tool to further enhance forest treatments and forest health.

Thank you for the opportunity to provide a letter of support for the Spotted Bear Mountain Project during the Objection Period. Should there be other Objections, Stoltze would like to be a part of the Resolution meeting and have the ability to voice our support for the Project.

Sincerely,

Matt Bishop
Forester
F.H. Stoltze Land & Lumber Co.