



VIA Email: [appeals-northern-regional-office@usda.gov](mailto:appeals-northern-regional-office@usda.gov)

July 7, 2021

Objection Reviewing Officer  
USDA Forest Service  
Northern Region  
26 Fort Missoula Road  
Missoula, MT 59804

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide objection support comments on the Stovepipe Project.

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. Many of our members have their operations in communities within and adjacent to the Flathead National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC is not submitting an objection during this Objection Period; instead, we are writing a letter of support for the Stovepipe Project and have some suggestions to be considered when the Project is implemented. AFRC has been tracking this Project for over a year and provided scoping comments on June 25, 2020, and Draft EA comments on April 23, 2021. AFRC is supporting the implementation of Alternative B as proposed.

We are supporting Alternative B for various reasons including:

1. As outlined in our scoping comments, the Stovepipe Project will be critical for the wood products manufacturers located in the Kalispel, Columbia Falls area because of its proximity

to these plants. We are pleased to see that the Forest increased the amount of commercial treatment acres in Alternative B (5,041 acres) from scoping (4,950 acres). Maximizing commercial timber harvest acres and volume is important for the forest products industry. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service land. 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 managed 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. Most 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 way these products are permitted to be delivered from the forest to the mills. As the Forest Service surely knows, the "restoration" treatments that are desired on these public lands cannot be implemented without a healthy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed. Studies have shown that in Montana as many as 12-15 direct and indirect jobs are created for every million board feet of timber that is harvested.

2. AFRC appreciates that the District considered our request to treat more acres:  
**Additional treatment for fuels reduction and vegetation management** *"We received public comment asking us to look for opportunities to increase the acres of vegetation treatment to more effectively modify fire behavior and provide more products to the local economy. We considered these comments and looked at opportunities to expand treatment in suggested areas. This area was recently treated in the Valley Face Fuels Reduction Project, so no additional opportunities were identified. The team believes vegetation treatments currently proposed would address the purpose and need while addressing other resource concerns."*

The table below outlines the commercial treatments proposed for the Stovepipe Project.

**Table 2. Summary of alternative B components**

Proposed vegetation treatments	Acres
Commercial thin	4,113
Seed tree	503
Clearcut	220
Shaded fuel break	205
<b>Total proposed commercial treatment</b>	<b>5,041</b>

In both our scoping and Draft EA comments we requested that the 4,113 acres where commercial thinning is proposed be thinned down to 40 sq. ft. basal area to accomplish both fuels goals and silvicultural goals. Many of those acres are within the WUI of Flathead County. We ask that you implement these silvicultural prescriptions on the ground in the upcoming timber sales.

3. Clearcuts and seed tree prescriptions are planned on 723 acres within the Project area. Several units are to be harvested using these methods will be larger than 40 acres and will need Regional Office approval. AFRC supports these treatments as the best way to take care of the silvicultural needs of the stands, and supports the Forest requesting Regional Office approval. AFRC believes implementation of these silvicultural treatments will be valuable for the forest, wildlife, and other resources.
4. AFRC supports the Forest's decision to implement 205 acres of shaded fuel breaks. We believe the shaded fuels breaks should be wide enough to effectively stop or slow a wildfire. With that in mind we suggest fuel breaks of at least 100 ft. on both sides of the road. We would also ask the District to consider thinning the stands to wide spacing leaving about 40 sq.ft. of basal area in the treated units as in the areas next to the WUI.

**AFRC appreciates the District's Response:** *"Thanks for supporting the use of shaded fuel breaks in the project. In some instances, the opposite side of the road from these planned fuel breaks has been previously treated or has riparian vegetation and is a barrier to fire spread. Shaded fuel breaks would be at least 100 ft wide, and similar to the response above, 40 sq ft would be considered where we are using mechanized equipment and resource objectives are met."*

5. AFRC supports the Travel Management Plan. This plan includes decommissioning about 1.2 miles of poorly located roads in the riparian area. The miles being decommissioned are down from the original 2.6 miles identified in scoping. While fewer miles are being decommissioned, AFRC would like to emphasize that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The land base covered in the Stovepipe Project area are to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

Additionally, we believe that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road

decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to attack nascent fires quickly and directly. On the other hand, an intact and well maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.

We would like the District to carefully consider the following three factors when deciding to decommission any road in the project area:

- a. Determination of any potential resource risk related to a road segment.
- b. Determination of the access value provided by a road segment.
- c. Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning. AFRC is generally supportive of BMP upgrades to existing roads, however we encourage the use of hydrologically self-maintaining structures like rolling drain dips rather than structures that require periodic maintenance or are subject to breakage such as flappers or open top box culverts.

**AFRC appreciates the District's response to our concern:** *"You are correct that an "intact and well-maintained road system" is vital to firefighters being able to rapidly access and suppress fires in certain cases; however, we have other resource concerns to consider when we decide to decommission roads. The road being proposed for decommissioning has strong rational and being offset by an upgraded road system with less resource concern and better long-term access (EA pg. 14). In the process of this analysis, a Fire and Fuels specialist was part of the transportation planning process for the project. The result is a cohesive plan that meets the needs of fire managers while meeting regulatory requirements. In situations where fires are difficult to access, or response times are long, fire suppression agencies have options to suppress fires with other resources that may not need to utilize roads for access. Overall, the project has a net positive increase in system road access as well as gated roads providing access for resource management and quick-fire response. We believe that the existing road system along with the project proposed changes is sufficient for initial attack fire response and general access for resource management. The project also adds two segments of road to connect road systems and fuel breaks to provide better ingress/egress for firefighters."*

6. In both our scoping and Draft EA documents, AFRC reminded the Forest that one of the primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Flathead

market area with a variety of skills and equipment. Developing this EA contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and feller-bunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Please prepare your NEPA analysis documents in a manner that will facilitate flexibility in the use of various types of equipment.

AFRC would also like the Forest to consider increasing the days allowed for log hauling. Often haul is curtailed around holidays, hunting seasons, vacation time, and winter activities. The number of days truckers can work has been significantly reduced in recent years and we suggest more liberal policies which would allow for more hauling days.

We are pleased that the District considered the following: *“FW-GDL-SOIL-01: Ground-based equipment for vegetation management should only operate on slopes less than 40 percent to protect soil quality. Exceptions will be considered only with site-specific analysis where soil, slope, and equipment are determined appropriate to maintain soil functions.”*

Furthermore, the District commented in the Decision that: *“In preparation of the Environmental Assessment the Forest Service makes its best possible determination of the logging systems in the project in order to provide enough details for the specialists to review the planned activity while still trying to maintain as much flexibility as possible. During the sale preparation phase, the Forest strives to determine the correct logging system to be used to best treat the unit and to accurately appraise the value of the timber. Sometimes this is obvious while other times multiple systems could be deployed for the same result. The unknown being which purchaser would end up being awarded the sale and which system a purchaser would be using. With a correct estimation of the acres for each type of system, the Flathead National Forest can better ensure it is offering an accurate advertised rate for the timber. During the sale implementation/logging phase, both Timber Sale and Stewardship Contracts maintain the flexibility to make approved changes to logging systems if needed through processes in place. Any changes to logging systems would still need to be within the range of effects analyzed in the EA.”*

7. AFRC has acknowledged that the Flathead Forest has been effectively using DxP for much of the commercial thinning work. We encourage the Forest to continue its use and we believe that better results can be achieved in a much more efficient and cost-effective manner by utilization of basal area thinning. The Forest participated in further discussions on this

topic during a meeting on April 23. AFRC and our members also visited the Crystal Cedar and Abbot Basin Projects on June 15. These projects used DXP with good results.

**AFRC appreciates the District's response to our input:** *"Thank you for your support, as guidance is continued to be developed for DXP we would continue to evaluate and utilize this tool when our land management objectives can be met in a more cost-efficient manner."*

8. AFRC continues to believe the District is taking an overly conservative approach to treating old growth stands. The Forest proposes that: *"Portions of several old growth stands or mature forests approaching old growth would be treated with alternative B, however this is limited to portions of units 801, 803, 805, and 807 which are hazardous fuels treatments adjacent to private lands removing only trees under 8 inches in diameter and treating surface and ladder fuels. These treatments would not reduce the number of large old trees in any stand."*

By only treating the non-commercial component of the old growth stands we do not think the Forest is accomplishing the needed fuels reduction next to private lands, nor do we think you are fire-proofing the stands or keeping them resistant to insect and disease damage. We would like to see a more aggressive strategy for treating in those stands including the use of commercial harvests.

While your response in the Decision discusses management in the future increasing in old growth stands, we still believe you are not taking enough actions immediately.

**Response:** *"As noted in the EA approximately 13% of the area appears to qualify as old growth forest. These stands are well distributed across the project area and it was decided early on in project development to not propose activity beyond necessary fuels work in these stands. However, as noted in the no action section, individual trees would continue to die in some of these stands at increasing rates. As stands across the area grow from small and medium size classes into large size classes opportunities to manage density and structure proactively in these stands should improve in the future."*

9. AFRC provided comments regarding management in the RMZ's. AFRC supports the Forest's plan to treat some acres in the Riparian Management Zone. Approximately 164 acres of management is proposed in Outer RMZ. AFRC would like the Forest to consider that it has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers.

While not treating to the degree we think necessary—we appreciate the District's response: *"We agree that there are trade-offs for vegetation management (or lack of management) within the RMZ. The 2017 Environmental Impact Statement for the Flathead National Forest Land Management Plan considered those trade-offs. The literature you provided (except Janish et al 2011 and Warren et al 2013) were considered in the 2017 Environmental Impact Statement which led to the Forest Plan desired conditions, standards, and guidelines for RMZs. A review of all the literature you provided can be found in project file exhibit V-2."*

*Gap cuts within the Inner RMZ are not compliant with Forest Plan direction and are not being considered in this project.*

*We appreciate your support for treatment within the RMZs. The Proposed Action seeks to find a balance of reducing fuels and improving forest health in the Outer RMZ but focusing on maintaining and enhancing aquatic resources in the Inner RMZ. A table showing treatment types in the outer and inner RMZs can be found in the EA on pages 9-10. Effects of these treatments can be found in the Aquatics section of the EA beginning on page 54. Sedimentation is a measurement indicator and the literature you provided (Rashin et al 2006) notes that retaining streamside buffers and prohibiting skidding and yarding near streams are effective in halting erosion to streams. This literature has been added to the analysis..”*

Thank you for the opportunity to provide supportive comments during the Objection phase for the Stovepipe Project. I look forward to following the implementation of this project as it moves forward. Should other objections be filed on this Project, AFRC would like to be included in the Resolution discussions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tom Partin  
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Portland, Oregon 97239