

Data Submitted (UTC 11): 9/26/2022 9:56:07 PM

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Organization:

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Comments:

VIA Electronic Mailing: <https://cara.fs2c.usda.gov//Public/CommentInput?Project=60892>

September 15, 2022

Forest Supervisor (Reviewing Officer)

Northern Regional; Office

Attn: Round Star Objection

26 Fort Missoula Road

Missoula, MT 59804

Dear Reviewing Officer:

On behalf of the Montana Logging Association (MLA) and its members, thank you for the opportunity to provide a support letter for the Round Star Project which is currently in the Objection Period.

MLA is Trade Association that represents 450 family owned/operated businesses in the harvesting/transporting of wood products in Montana. A number of our member's partner with the U.S. Forest using their expertise, employees and equipment to achieve forest management goals.

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

1.The MLA is pleased to see that 6,324 acres of the approximate 22,000 acres of Forest Service land will be treated commercially (29% of the land). 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. This supply is important for present day needs but also important for future needs. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments effect the long-term sustainability of the timber resources on Forest Service managed land.

2.MLA suggested that the use of Designation by Prescription might be a good option for designating the trees to be harvested and those to be retained especially in commercial thinning, seed tree, improvement cuts, and shelterwood harvests. We also encourage the District to reduce stocking in these units down to 40 sq.ft. of basal area to promote tree vigor and reduce fuels. This is especially true in lands included in the Wildland Urban Interface where fuels reduction is paramount.

3.MLA supports the Forest's proposal on this which states: "The project does not propose any obliteration of existing or proposed system roads. The interdisciplinary team conducted a project-level travel analysis which identified system roads needed for long term access and forest management, which were carried forward in the Round Star Project with barrier or gate closures. Roads proposed for project implementation but not needed for long term management were identified as temporary roads. Timing restrictions are included in the Round Star Project where necessary to protect resources."

4. After touring the Round Star project, the MLA noted that there are varying stands in different stages of growth and past management. A timber sale based solely on the plantation lodgepole pine stands that have minimal volume will be unattractive to bidders and could lend towards a no-bid. The MLA suggests when compiling timber sales out of the Round Star project that both low and high volume acres be included.

5. MLA strongly supports the use of shaded fuel breaks along the planned 71 miles of system roads for log haul. Not only would fuel breaks provide ingress and egress for the WUI, but also provided wood products for the timber industry infrastructure. We recommend a minimum of 200 feet on each side of the roads.

Thank you for the opportunity to provide a letter of support for the Round Start Project during the Objection Period. The MLA looks forward to its implementation in 2023.

Sincerely,

Tim McEntire
Northwest Region Representative
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