



**VIA Email:** [comments-northern-beaverhead-deerlodge@fs.fed.us](mailto:comments-northern-beaverhead-deerlodge@fs.fed.us)

April 3, 2019

USDA Beaverhead-Deerlodge National Forest  
Pintler Ranger District  
Attn: Cameron Rasor  
88 Business Loop  
Philipsburg, Montana 59858

Dear Cameron:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Rancho Deluxe 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 Beaverhead-Deer Lodge 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.

The Rancho Deluxe project is located approximately 9 miles west-northwest of Deer Lodge, Montana. The project area is approximately 4,075 acres and lies on the eastside of the Flint Creek Mountain Range in Powell County. The project area has been identified as part of a priority landscape impacted by insects and disease pursuant to Section 8204 of the 2014 Farm bill. As such this project can be categorically excluded from detailed analysis in an Environmental Assessment or Environmental Impact Statement. Further, this project was originally developed and proposed to the Forest Service by the State of Montana as a potential Good Neighbor Authority project.

AFRC agrees with the Purpose and Need for the project which is to restore desired structure, function, composition, and connectivity of the forested areas that have been impacted by insects and disease, and to bring those stands back to desired conditions.

While AFRC supports the Purpose and Need for this project, we offer the following comments that we believe will help the project as it is implemented.

1. First AFRC supports this project as both a Farm Bill CE project and a Good Neighbor Authority, and we appreciate the support of the local collaborative. There appears to be no extraordinary circumstance that would require an EA or EIS. The expedited NEPA using a CE will help control the insects and disease that are currently impacting the stands. Using GNA will help expedite the project as well with Montana DNRC staff helping to layout and implement the project. AFRC strongly supports the GNA program and selling this project under GNA to generate funds to be used to help implement other GNA projects.
2. AFRC would like the Forest to possibly identify other acres within the project area that could be commercially treated during this entry. Currently only 1,333 acres of the total project area of 4,075 acres or 33% of the land is scheduled for commercial harvest. Given the state of the heavy mortality in the lodgepole stands, and the overcrowded nature of the Douglas-fir stands, every opportunity should be taken to remove as much commercial volume during this entry to increase the pace and scale of restoration. Further, Sun Mountain Lumber's close proximity to the project area might facilitate the treatment of some stands that have marginal volumes per acre and/or marginal values that, under different circumstances, may be economically unviable. Regardless, maximizing volumes of timber harvest on any given timber sale is important to the milling infrastructure in Montana.
3. AFRC would like the Forest to consider increasing the volume of green Douglas-fir to help enhance the economics and to offset the low value of the dead lodgepole AFRC member sawmills also need sawlogs not chip wood to operate their plants. As pointed out the benefit of this project will also be for improving employment and income for the local communities. These plants are important for the jobs they create in local communities and for counties. 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. The majority of the industry is centered in western and central Montana where the Rancho Deluxe project is located. Additionally, AFRC members are struggling to find needed raw materials to run their operations and keep employment levels at their current rate. With these factors in mind we encourage the Forest to look at doing a larger project footprint to generate more volume for the logging and sawmilling infrastructure, and to provide more funds to do the needed restoration work such as replanting.
4. AFRC recommends regeneration harvests in the stands of dead lodgepole to remove the standing dead and residual green volume. This will allow for a conversion to a young healthier stand of conifers and could allow for the planting of more fire resistant species such as Douglas-fir. Further AFRC recommends thinning to wide spacings (leaving only 40 square feet of basal area per acre in the 847 acres of Douglas-fir for the purpose of fuels reduction and stand vigor. Wider spacings will make the residual trees healthier and more vigorous and able to better resist attacks from insects and disease.

5. AFRC supports the removal of encroaching coniferous species to promote the health in stands of aspen. AFRC also supports removing conifer species by as much as two or three tree lengths to improve these aspen stands.
6. AFRC supports the reconstruction of 7.6 miles of temporary roads to access the units in this project. Once the roads have been completed and used, AFRC favors decommissioning these roads rather than obliteration. A close analysis of what roads may be needed for future management, fire access, or recreation should be conducted, and those roads that could be used in the future should be decommissioned. Obliteration of roads are costly and should only be used as a last option.
7. AFRC supports harvest units greater than 40 acres in size to address forest health and fuels issues. These units require Regional approval but are necessary to accomplish the purpose and need of this project.
8. AFRC continues to recommend using tractor skidding on slopes over 35% to more efficiently capture the economic value of the timber and to provide more revenues back to the Forest for other resource improvements. New skidding equipment and techniques allow the Forest to capture the timber value on steeper slopes while still protecting other resources such as soil and water.
9. AFRC suggests the Forest try using DXP for silvicultural work in this project. The species and prescriptions seem to lend themselves to this kind of timber marking regime and would keep pre-operational marking costs lower.
10. AFRC encourages the Forest to treat stands in old-growth units. These stands are currently susceptible to wildfire and the fuel loadings need to be reduced. Thinning these stands will enhance growth and protect them from insects, disease and wildfire and ensure their survivability into the future.
11. AFRC recommends that the Forest have measures in place to salvage any timber that may die in the prescribed fire part of this project. Using prescribed fire is not a finite science and conditions during the time this tool is being used can change rapidly, thus making salvage a viable option.

Thank you for the opportunity to provide scoping comments on the Rancho Deluxe Project. I look forward to following the implementation of this project as it moves forward.

Sincerely,



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