



VIA Email: comments-northern—gallatin@fs.fed

June 29, 2019

Drew Grimes and Josh Hemenway
Co-Project Leaders
Custer Gallatin National Forest Supervisor's Office
PO Box 130
Bozeman, MT 59715

Dear Drew and Josh:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Ecotonal Habitat Restoration 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 Custer-Gallatin National Forest (CGNF) and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

This project is designed to restore and maintain certain habitats, critical ecosystem functions, and biodiversity at the local and landscape scales. The purpose of the project is to address several processes that have contributed to the deterioration of ecotonal communities on the CGNF. These include a lack of recent disturbance, ongoing plant succession, and impacts from past land management. Restoring the health and vigor of ecotonal communities will improve wildlife habitat, increase resiliency to wildfire, and improve watershed health.

Project implementation would be ongoing and could span 10-15 years. This could result in as many as 6-10 specific projects implemented annually across the Forest. Projects would typically range in size from several acres to a few hundred acres. It is anticipated some projects could cumulatively exceed a thousand or more acres. This restoration proposal represents a

programmatic level management decision that will allow the Forest Service to actively manage and maintain more ecotonal habitats closer to desired habitat conditions.

The Forest Service estimates, based on existing capacity, an average of between 500 and 5,000 acres may be treated annually through the Ecotonal Habitat Restoration Project. This estimate is not intended to be limiting. In some years total restoration acreages could exceed 5,000 acres. This estimate is highly dependent upon project design and objectives, weather conditions, personnel capacity, funding, access, seasonal restrictions, and other management considerations.

Under this project there are many management options that would be available to maintain or restore ecotonal communities across the CGNF, including commercial harvesting of timber. While we support all of the tools the Forest plans to use, AFRC's comments will focus more on the commercial harvesting of sawlog aspect. AFRC supports the purpose and need for the project, and makes the following suggestions that we believe may improve the project.

1. AFRC supports the use of the programmatic level management decision to cover the proposed actions over an extended time frame. Additionally, AFRC believes that including as much commercial timber harvest in these projects could provide much of the funding to help with the restoration of other resources. The existing sawmilling infrastructure needs to be a partner in this effort because their crews will ultimately be doing much of the work on the ground.

Further, the benefit of these projects 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 Ecotonal Habitat Restoration 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. AFRC believes supporting the infrastructure and local communities in the purpose and need helps strengthen the NEPA record.

2. AFRC believes that commercial timber harvest is largely needed to manage and improve the six vegetation type treatments being focused on in this project including aspen restoration, whitebark and limber pine improvement, grassland/forest interface, riparian areas, woody draws, and montane ponderosa pine improvement. Commercial harvest in conjunction with precommercial thinnings, burnings and other silvicultural treatments is the key to bringing these lands back into a Historic Range of Variability.
3. AFRC suggests that when seed tree, shelterwood, or commercial thinning harvests are used the leave tree spacing is kept to a maximum. Leaving 40 sq. ft. of basal area per acre usually provides good spacing for residual trees to allow for vigor in remaining trees

and to reduce the fuels loading. This is particularly needed in the areas of the WUI where fuels reduction is needed to protect adjacent properties.

4. AFRC suggests the Forest try using DXP for silvicultural work in this project outside of units where clearcutting and regeneration harvests are proposed. Several of the tree species in the area and the needed prescriptions seem to lend themselves to this kind of timber marking regime and would keep pre-operational marking costs lower.
5. AFRC suggests the Forest look at regeneration harvests in some areas where insects and disease, root rot and other diseases have diminished Forest productivity. Opening up stands of timber also provides much needed early seral plant species for deer and elk populations.
6. AFRC recommends the Forest consider 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.
7. AFRC believes that analyzing this project using an Environmental Assessment (EA) is adequate since there appears to be no significant negative impacts on the landscape during proposed operations, rather the actions will improve forest health and benefit other resources as well as reducing the threat of catastrophic wildfire to the Forest and to adjacent land owned.
8. Finally, AFRC appreciates the approach by the Forest of trying to provide some needed management on acres that aren't in the main vegetation types. Using a programmatic level management decision should reduce planning costs and put more emphasis on treatment.

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



Tom Partin
AFRC Consultant
P.O. Box 1934
Lake Oswego, Oregon 97035