



AFRC Supports Modernizing BLM Forest Management Rules

The Bureau of Land Management (BLM) is proposing to modernize its forest management rules for the first time in 35 years. The BLM has an active forestry program in Idaho, Montana, Colorado, California, and Western Oregon – where the agency manages some of the most productive forestlands in the world. AFRC strongly supports these efforts.

The proposed rules provide an alternative to “paperwork protests” that block efforts to manage our forests to keep them healthy and accessible. Under current rules, anti-forestry groups stall forest management by filing written objections after environmental analyses have been completed, public input has been received, and land management decisions have been made. These paperwork protests often contain hundreds of pages of frivolous points that have little to do with the work at hand.

Because the BLM must respond to each point under the rules, this broken process drains taxpayer resources and brings forest management to a halt. In a few extreme cases, wildfires destroyed our forests where smart forest management was planned but paperwork protests delayed implementation.

For example, the Pickett Hog timber sale in Oregon received 29 protests in September 2017 – delaying the project by more than a year. Before the BLM could complete protest reviews and responses, the Taylor Creek fire burned the forest and project area in July 2018 (*photo, right*). The project would have improved forest health, produced local timber, supported jobs, and generated revenue for essential services.



Public comments for the proposed rules are due by August 7.

AFRC’s substantive comments – with data and additional examples explaining why the existing process is broken – [can be found here](#). Healthy Forests, Healthy Communities (HFHC) has also set up a [comment form on its web site](#), which you can use to submit comments in just two minutes. So far HFHC has generated over 2,100 supportive comments on the proposed rule.

Earlier this month, the BLM also accepted comments on a proposed new tool to expedite the agency’s review of timber salvage project operations. The new tool, known as a Categorical Exclusion (CX), would potentially enable the BLM to more effectively treat dead and dying forests that represent a growing threat to forests and communities across the western U.S.

The proposed CX would permit salvage of up to 5,000 acres of fire- or storm-damaged timber. Approved projects must still comply with all federal environmental laws and management plans. This is an important tool because it would allow for the timely removal of merchantable material after a fire to

support the remaining milling infrastructure and jobs that are critical to responding to future fire and disturbance events. These materials deteriorate quickly after a fire, making quick removal important to the industry infrastructure and to help fund restoration activities. AFRC encouraged and organized a broad group of stakeholder groups to weigh in on the proposal. AFRC's supportive comments can be found [here](#). The public comment period closed on July 2. /Travis Joseph

Washington, D.C. Update



COVID-19 Aid. Congress has turned its focus to negotiations over the next round of COVID-19 relief. The House passed the \$3 trillion HEROES Act on May 15, which was immediately dismissed by the Senate. Last week, Senate Republicans released their own \$1 trillion proposal that focuses on increased funding for testing, reopening schools, and providing additional relief payments to Americans. The Senate proposal does not include aid to state and local governments to offset lost revenues due to the pandemic, which is a high priority for Democrats. Congressional

leaders and the White House hope to reach an agreement before Congress' August 7 scheduled recess, but the two parties remain far apart.

The American Loggers Council (ALC) is urging Congress to include \$2.5 billion in aid for loggers and truckers impacted by COVID-19. The "Logger Relief Package", which has been introduced in both the House and Senate (HR 7690/S. 4233), would authorize grants and loans for companies that saw revenue decline by at least 10% during the first half of 2020 due to the pandemic. Logging companies in some states have seen revenue impacts of approximately 30% - threatening the viability of many small, family-owned companies with high fixed costs often tied to machinery. More information on the proposal is available at ALC's [website](#). AFRC has endorsed the legislation.

Great American Outdoors Act. On July 22, the House passed the Great American Outdoors Act (GAOA) by a vote of 310-107 to send the legislation to President Trump, who is expected to sign it into law. As reported in the [June Newsletter](#), the legislation would direct up to \$9.5 billion over the next five years to address the maintenance backlog on public lands. Our industry and other supporters of the Forest Service worked to increase the agency's share of this funding, bringing it to 15% after originally being allotted just 5%. The U.S. Park Service would receive most of the funding.

The Forest Service has an estimated \$4-5 billion maintenance backlog, most which is tied to its 385,000-mile road system. A failing road system now limits access to areas available for timber harvest and threatens the economic viability of proposed timber sales due to associated road work. It also limits public access and can also make fighting wildfires more dangerous and expensive. Under GAOA, the Forest Service could direct up to about \$100 million per year to road maintenance out of its \$285 million allocation.

The GAOA will also mandate full, mandatory funding of the Land and Water Conservation Fund at \$900 million per year, roughly double the amount the program has been receiving through the annual appropriations process.

Interior Appropriations. On July 24, the House adopted a "minibus" containing four of the annual appropriations bills, including the measure that funds the Department of the Interior and Forest Service. Under the Fiscal Year 2021 legislation, the Forest Service would receive a large increase in hazardous

fuels reduction funding (a \$65 million increase to \$510 million total) and more modest increases to the Forest Products (a \$10 million increase to \$383 million total) and the Forest Service Roads (a \$4 million increase to \$224 million total) accounts – both priority line items for the forest products industry.

The House committee report accompanying the Interior Appropriations bill includes non-binding report language, including language requested by Rep. Derek Kilmer (D-WA) encouraging the Forest Service to prioritize the development of a new forest plan for the Olympic National Forest. The Olympic is the only national forest in the Northwest Forest plan area without any Matrix lands for ongoing, active forest management:

Northwest Forest Plan.—The Committee urges the Forest Service to consider prioritizing forests where there are no matrix management areas designated for ongoing, active management and timber production when revising individual forest plans under the Northwest Forest Plan. The Forest Service, in updating these plans, is encouraged to use the best available science to evaluate how new matrix designations and raising current age restrictions on harvestable timber would improve forest health, promote habitat complexity in second-growth forests for threatened and endangered wildlife, and increase timber production to support rural economies.

Rep. Kilmer’s office drafted similar language earlier this year as the House was considering the Wild Olympics Wilderness legislation, but did not amend it to that legislation. While AFRC remains opposed to Wild Olympics, AFRC President Travis Joseph provided a quote in support of the report language for a recent [press release](#) issued by Rep. Kilmer outlining his work on timber issues through the Appropriations process. The press release also highlighted language encouraging the Forest Service to continue research into advanced wood products, including those that incorporate carbon fiber similar to what is occurring at a research facility in Port Angeles.

The report also included other notable policy recommendations for the agency:

Removal of Dead and Dying Trees.—The Forest Service is urged to consider the use of all existing authorities to remove dead and dying trees in California and the western United States.

Wet Forest Resiliency.—The Committee recognizes the need to ensure forest resiliency and support multiple uses on national forest lands. The Committee urges the Forest Service to incorporate a variety of landscapes, including wet forests, as it develops future projects for the Collaborative Forest Landscape Restoration Program.

Meanwhile, the House Committee report also included language regarding BLM policies in Western Oregon, including language addressing timber targets and resolving delays caused by administrative protests that has appeared in previous years’ bills:

Fire protection.—The Committee directs the Bureau to refrain from any actions that would withdraw the Bureau from its fire protection agreement with the State of Oregon.

Timber targets.—The Committee continues to be troubled by the disparity in timber targets compared with timber awarded and harvested on some districts. The Bureau is once again directed to prioritize response to administrative protests on timber sales in a timely manner

and to report timber sale accomplishments in volume of timber sold and awarded, rather than merely the volume offered for sale, and shall report to the Committee on its progress.

The BLM would receive an additional \$3.5 million for the management of the Oregon & California Grant Lands in Western Oregon, bringing this account to \$117 million for Fiscal Year 2021. The BLM continues to increase its timber outputs under its 2016 Resource Management Plans as it awaits a potential court order to increase timber volume further after the DC District Court ruled those plans were illegal.

The Senate has not acted on its Fiscal Year 2021 appropriations bills due to a lack of agreement over amendments. With the November election just over three months away, Congress is expected to pass a Continuing Resolution to fund the government until after the election.

Wild Olympics, Wilderness Legislation. On July 21, the House attached a package of Wilderness bills to the National Defense Authorization Act (NDAA) to designate almost 1.5 million acres of additional Wilderness in Colorado, California, and Washington. The House had previously passed these Wilderness bills on February 12 (see [February Newsletter](#)), but the latest move represents an effort to attach the bills to must-pass legislation. The Senate passed its own version of the NDAA and the two chambers will now proceed to conference negotiations. The Trump Administration issued a Statement of Administration Policy expressing concerns with the House legislation, but it did not address the Wilderness package.

The Wild Olympics legislation would designate about 130,000 acres of Wilderness and “potential” Wilderness on the Olympic National Forest and add 564 miles along 19 rivers to the list of Wild & Scenic Rivers. The ¼ mile buffers associated with the Wild & Scenic Rivers designations would add additional restrictions on about 60,000 acres of the Olympic National Forest outside of the areas proposed for Wilderness designations.

Rep. Jared Huffman’s (D-CA) Northwest California Wilderness proposal would designate nearly 260,000 acres of Forest Service lands as Wilderness and “Potential” Wilderness areas, 379 miles of new Wild & Scenic River designations, and establish a 730,000-acre “Restoration Area.” Under both proposals, the Forest Service would be required to develop dozens of “Comprehensive River Management Plans” as required by the Wild & Scenic Rivers Act – draining limited agency resources away from on-the-ground projects. /*Heath Heikkila*

New NEPA Regulations Finalized; A Hundred Lawsuits Bloom

On July 16, the Council on Environmental Quality (CEQ) [issued revised regulations](#) implementing the [National Environmental Policy Act \(NEPA\)](#). This is the first wholesale revision of the regulations since they were issued during the Carter Administration in 1978. The Final Rule was coupled by a presidential [announcement](#) at an event in Atlanta, with a focus on infrastructure permitting. (see [CEQ’s Fact Sheet here](#))

The new regulations make significant changes in a number of areas. These include presumptive time limits of two years for the preparation of environmental impact statements (EISs) and one year for the preparation of environmental assessments (EAs), and page limits of 75 pages for EAs, 150 pages for most EISs, and 300 pages for complex EISs. The new rules [remove](#) the former ten “intensity” factors that are used for determining whether an EIS is necessary, replacing them with a qualitative assessment. ([40 CFR 1508.27](#).) The rules also [remove](#) many references and requirements relating to cumulative impacts.

In the final rule, CEQ [remarked](#) that “NEPA is the most litigated environmental statute in the United States.” True to form, opponents of streamlining have geared up the litigation apparatus, including one [case](#) already filed in California by 21 groups. Another [coalition](#) has announced plans to litigate, and a third has [filed suit in Virginia](#).

The effective date of the new rules is up in the air. The lawsuits will seek to prevent them coming into effect. The Federal Register notice [indicates](#) the new rules will be effective no earlier than September 14, 2020. Additionally, the Congressional Review Act requires a report to GAO and Congress 60 days before a major rule goes into effect, and no report has apparently been sent so far. That puts the earliest effective date around the end of September.

AFRC is unsure what impact the CEQ regulations will have on the Forest Service’s proposed changes to its NEPA regulations, which were expected to go final this summer after a multi-year effort by committed career Forest Service staff. The new CEQ regulations ensure that all existing categorical exclusions (CEs) may continue to be used and give agencies until one year from the effective date (approximately September 2021) to revise their regulations. */Lawson Fite*

Forest Service Releases Bioregional Assessment

This month, the Forest Service published a document that will inform future forest management plan revisions on approximately 24 million acres of federally managed land from the Canadian border through northern California. The assessment area encompasses 19 individual National Forests and Grasslands including all those whose current plans were amended by the Northwest Forest Plan (NWFP) in 1994. Among other things, the [Bioregional Assessment for Northwest Forests](#) evaluates the effectiveness of current management plans, identifies challenges of implementing those plans, and highlights recommendations for future plan revisions. Through these recommendations, the Assessment lays the groundwork for plan revisions and begins to form the blueprint for both the substance of those revisions and their direction and focus.

The structure and substance of the Assessment was informed through a series of public “listening sessions” facilitated in 2015 and internal feedback from Forest Service employees. Information gathered through these two channels yielded five categories that organized the findings and recommendations: ecological integrity, fire and fuels, sustainable timber, habitat management, and sustainable recreation. Ten recommendations for improving land management plans were developed across these five categories. These recommendations offer a glimpse into the direction that future management plan revisions could take. A few key excerpts are listed below:

- A one-size-fits-all approach, such as the current direction related to tree age and size in the NWFP and the Eastside Screens can create barriers to implementing appropriate management.
- Land management plans should address the need to manage habitats to reduce opportunity for competition between native and invasive species.
- It is not practical to use only mechanical harvest and prescribed fire to meet landscape resource objectives. It is essential that we restore natural fire into ecosystems in the assessment area. Land management plans need an improved focus on managing wildfires.
- There is a need to update land allocations to be better aligned with the habitats they are trying to protect, such as critical habitat for the northern spotted owl and late-successional reserves. There is a need for land management plan direction that better aligns with the U.S. Fish and Wildlife Service’s northern spotted owl recovery plan and critical habitat unit.

Also noteworthy is how the Assessment characterizes timber management. Absent from the Assessment is the concept of timber management for the purpose of managing timber and providing the American public with wood products. Instead, timber harvest is exclusively and repeatedly described as a “tool” to meet ecological objectives. The absence of timber as a Forest Service objective is troubling, particularly given the growing and expanding public demand for wood products.

The Assessment goes on to discuss what is currently working well under the NWFP. Included in this section is an outline of the timber program and an observation that it has not reached the output levels anticipated in the NWFP. This shortfall is attributed to a combination of conflicting plan direction and perceived lack of social acceptance of certain harvest techniques that collectively have compelled the Forest Service to abandon the management paradigm explained in the NWFP in favor of a program that exclusively thins young stands. The Assessment offers an astute observation on the potential repercussions of this paradigm to the attainment of a sustainable timber program by stating that *“the challenge arises because areas available for restoration and commercial timber production will be thinned or have already been thinned within the last 30 years.”* The authors’ recognition of the unsustainability of the current “thinning-only” paradigm is refreshing. AFRC looks forward to working with the Forest Service on future management plan revisions to create plans that are responsive to this dilemma and that are capable of fostering a truly sustainable timber program.

Finally, the Assessment addresses potential next steps for management plan revisions and public engagement. Several strategies for revisions are outlined; these include revisions where all 19 management plans are revised simultaneously, incremental revisions where individual Forest plans are revised in “batches”, and individual plan revisions where each plan is revised independently. While the Assessment does not clearly identify which strategy is preferred, it does note the importance of recognizing the interconnectedness of these Forests, especially those adjacent to one another, and that plan revisions done in a vacuum are not desirable. Clear prioritization of Forest plans in need of revision is also not explicit in the Assessment. However, the Assessment ranks each Forest in terms of its “urgency to address lack of resiliency.” Forests where this urgency is rated “high” include the Fremont-Winema, Rogue River-Siskiyou, Six Rivers, Klamath, Modoc, Lassen, Shasta-Trinity, Mendocino, and Ochoco and the Crooked River National Grassland. Leadership in both Regions 5 and 6 are currently developing “robust opportunities” for public engagement regardless of the chosen approach to plan revisions across the region. A project website has been created [here](#). If you are interested in receiving updates to the process, click [here](#). /Andy Geissler

DNR Litigation Update: A Significant Early Victory

At the beginning of 2020, AFRC joined a broad coalition in challenging Washington DNR’s adoption of the Marbled Murrelet Long-Term Conservation Strategy and the 2015-24 Sustainable Harvest Calculation (see [December 2019 Newsletter](#)).

The coalition now includes AFRC, the City of Forks, the Port of Port Angeles, two fire districts, four school districts, and Mason, Pacific, Wahkiakum, Lewis, and Skamania Counties. The coalition has brought claims in [Skagit County Superior Court](#) for breach of fiduciary duty/trust, a *writ of certiorari* (judicial review) under the [Washington Constitution](#) (Article IV, Section 6), SEPA violations, and declaratory judgment.

Skagit County and four county service districts have brought claims for breach of trust regarding the Harvest Calculation. At the same time, a number of environmental groups brought their own *writ of*

certiorari case in King County. That case, now transferred to Thurston County, is likely to be resolved on briefings by October. The beneficiary coalition has intervened.

The two beneficiary cases have been consolidated and have been the subject of several rounds of motions. DNR initially tried to get all the cases transferred to Thurston County, after the environmental plaintiffs agreed to a transfer. The Skagit County Superior Court responded by splitting our case, sending only the *certiorari* claim to Thurston County. (The coalition is [asking](#) the Court of Appeals to step in).

DNR then moved to dismiss, arguing that beneficiaries could not bring a direct claim for breach of trust. Instead DNR argued that those claims had to be wrapped into some sort of “agency” or APA claim, such as a *writ of certiorari*. This was an attempt to rewrite the Washington Supreme Court’s seminal decision in [Skamania County v. State](#) (1984). *Skamania* ruled that the state forest trusts “are real, enforceable trusts that impose upon the State the same fiduciary duties applicable to private trustee.” Here, the State was attempting to convince the Court that only the deferential “arbitrary-and-capricious” standard would apply.

At a hearing on July 16, the court denied DNR’s motion to dismiss, and DNR’s request to certify ruling for immediate appeal. This is a significant legal victory for the beneficiaries which also puts the case on track for eventual trial in Skagit County. /*Lawson Fite*

Brebner Flat Project is Cleared to Proceed with Operations



On July 13, Judge B. Lynn Winmill of the U.S. District Court for the District of Idaho denied a motion for preliminary injunction against the Brebner Flat Project on the Idaho Panhandle National Forest (*photo of project area, left*). Less than two weeks later, the Ninth Circuit denied the request for an emergency motion for an injunction pending appeal, allowing the forest health project to proceed. AFRC member Stimson Lumber intervened in the litigation in support of the Forest Service. Stimson has purchased one of the timber sales associated with the project.

The Brebner Flat Project was developed to improve the forest’s resiliency to drought, insects and disease. The project includes logging treatments to reduce the risks of severe fire and provides timber to support local economies. As the project includes Wildland Urban Interface (WUI) near the town of Avery, Shoshone County has identified the project area as an area of concern in its Community Wildfire Protection Plan. Logging and prescribed burning are planned to occur on approximately 1,700 acres, or 14 percent of the 12,000-acre project area. Approximately 10.5 miles of roads will be constructed or reconstructed for the project. The Decision Notice determined that there would not be a significant effect on the environment and that there would be no effect on grizzly bears or lynx due to the project activities.

Alliance for the Wild Rockies and Friends of the Clearwater filed a lawsuit seeking to halt the project. Among several claims, they argued the Forest Service violated the Endangered Species Act (ESA) because the agency did not properly consult with the U.S. Fish & Wildlife Service on impacts to wildlife. In its analysis, the agency determined neither grizzly bears nor lynx were known to be present in the area and the project would have no effect on those listed species. The plaintiffs also claimed logging would

impact a Wild & Scenic River corridor, even though the project itself is not actually located within the Wild & Scenic area.

Two days before Stimson planned to begin implementation, Judge Winmill denied the plaintiffs' request for a preliminary injunction. The district court found that "plaintiffs make no effort to allege Project implementation will cause irreparable harm to the ESA-listed species at issue" and, instead, focused their allegations of harm on a purported procedural ESA violation. Judge Winmill also noted the benefits of the project to reduce fire risks and support the local economy, finding the "public interest and balance of equities tips in favor" of implementing the project.

Plaintiffs immediately filed a notice of appeal with the Ninth Circuit and moved for an emergency motion for injunctive relief. On July 24, the Ninth Circuit Motions Panel (Judges Schroeder and Callahan) denied the motion for injunctive relief. Stimson can proceed with operations while the parties brief the merits of environmental groups' appeal of the district court's denial of the preliminary injunction request. We anticipate that the Ninth Circuit will hear the preliminary injunction appeal in late 2020 or early 2021. AFRC appreciates the assistance of Julie Weis from Haglund Kelley LLP in this matter. /Sara Ghafouri

The Crystal Clear Restoration Project Litigation Battle Continues



As reported in the [April Newsletter](#), the Ninth Circuit Court of Appeals issued an unfavorable decision on the Crystal Clear Restoration Project, a fuels reduction project on the Mt. Hood National Forest (*photo of project area, left*). The project abuts two Wildland Urban Interface areas (Juniper Flats and Warm Springs) and would generate approximately 60 million board feet.

The Forest Service anticipated that six timber sales or stewardship contracts would be needed to implement the project, three of which have already been awarded. AFRC intervened on behalf of member High Cascade, who was awarded the Ahoy Stewardship Contract and the Plank Timber Sale.

The Ninth Circuit opinion was originally an unpublished memorandum decision but was later submitted for publication with Judge Higginson, a Fifth Circuit judge sitting by designation, as the author.

On July 27, AFRC filed a petition for rehearing either by the original panel or the full court (*en banc*). In the petition for rehearing, AFRC argued that the decision conflicts with United States Supreme Court and Ninth Circuit precedent that a court is not equipped to second-guess an agency in matters within its core expertise. Specifically, AFRC asserted that the Ninth Circuit panel failed to give deference to the Forest Service's evaluation of scientific information and permitted Bark (the appellants) to create scientific "controversy" related to the agency's use of variable density thinning within older stands in the project area. Although the Forest Service explained why it did not credit the contentions of the "scientific" newspaper opinion pieces submitted by Bark, the Ninth Circuit impermissibly required the Forest Service to explicitly address those specific documents. AFRC also argued that the Ninth Circuit erred in its remedy determination, improperly stating that an EIS "is required" rather than remanding back to the Forest Service for a new decision.

Surprisingly, the Federal Government also petitioned for rehearing *en banc*, which required the Solicitor General's approval. *Amicus curiae* briefs in support of the petition for rehearing are due August 6. The Ninth Circuit has 21 days to determine whether to hear the matter *en banc*. /Sara Ghafouri

Post-Fire Management Science Published

A recent study published in *Hydrological Processes* examined short and long term effects of post-fire management treatments, including timber salvage, on hydrology. The authors of [the study](#), titled *Long-term Hydrologic Recovery after Wildfire and Post-fire Forest Management in the Interior Pacific Northwest*, identify a need to improve understanding of post-fire hydrologic recovery to foster better informed land management decisions following disturbance.

The selected study area offered a unique opportunity to use ten years of previously collected data prior to disturbance. In 1957 the Entiat Experimental Forest, in north central Washington, was established to study the effects of timber harvest and road construction on hydrologic processes. Baseline data on streamflow was collected in three adjacent watersheds in the Forest for almost 12 years before a lightning-ignited fire burned all three watersheds in 1970. Fire severity, aspect and soil conditions were uniform across the three watersheds. This event offered an opportunity to monitor impacts to streamflow following implementation of post-fire management against 12 years of pre-fire baseline data.

Two of the three watersheds were salvaged logged and reseeded, the third was left unmanaged. Post fire data was collected in years 1-7 and 35-41 years following the disturbance. Data from the first 7-year period showed increases in annual discharge, peak flows, and low flows on all three watersheds. Data from years 35-41 indicated that discharge, peak flows and low flows returned to pre-fire levels on the two watersheds that were salvage logged and reforested. The burnt watershed that was not salvaged or reforested had discharge and runoff levels that remained elevated during the 35-41 period.

These results indicate that post fire salvage and reforestation treatments may have increased the rate of hydrologic recovery when compared with unmanaged watersheds. These results could be attributed to the accelerated reforestation facilitated by the seeding and the conditions created by salvage logging that facilitated productive vegetation growth. /Andy Geissler

New Forest Plans Shape Eastern Montana's Future



Two of the three eastern National Forests in Montana are about to wrap up their Forest Plan Revisions. These new Plans will dictate management priorities for the next two to three decades. The Helena-Lewis and Clark National Forest (HLC) covers 2.9 million acres and the Custer Gallatin National Forest (CG) covers 3 million acres- and together- form a swath of land from Helena, Montana into North Dakota. The Beaverhead-Deer Lodge which covers 3.3 million acres, is currently not undergoing a Forest Plan revision. Combined these three Forests cover 9.2 million acres and are grouped into what the Forest Service calls the Eastern Pod Forests of Region 1. The two other Pods in Region 1 are the North Idaho

Pod (Idaho Panhandle and Nez Perce-Clearwater National Forests), and the Western Montana Pod (Bitterroot, Flathead, Kootenai, and Lolo National Forests).

AFRC and our member companies understand the importance of being involved in these planning efforts which began in 2016, because the outcome will provide guidance for land managers for all uses on these Forests including recreation, grazing, mining, water resources, timber and economic benefits to local communities and counties. Much of the input AFRC provided emphasized the need for sustainable timber management to accomplish both forest health and preserve the handful of sawmills remaining in eastern Montana that depend on those Forests for their raw materials. Complicating forest management during the past decade has been large infestations of mountain pine beetle,



Douglas-fir bark beetle, and Douglas-fir tussock moth which have impacted millions of acres of lodgepole pine and Douglas-fir forests across all three eastern Forests as the photos in this article illustrate.

AFRC has encouraged both Forests to emphasize the short-term need to address the insect and disease infestations to help the forests get back into a healthy state. This means rapidly removing the dead and dying timber and reducing the heavy fuel loadings caused by the mortality. Further underscoring the need for more short-term management was the recent announced closure of the R-Y sawmill in Townsend, Montana. For this mill to reopen, and to support the other area sawmills- such as Sun Mountain Lumber, Pyramid Lumber, Idaho Forest Group and R-Y's mill in Livingston- a higher and predictable level of timber from these Forests is necessary.

Unfortunately, the land management designations in both Plans do not favor active timber management. In the HLC Plan, only 368,000 acres or 13% of the Forest is designated as suitable for timber production while the CG has 565,000 acres or 19% designated as suitable. Both Forests have large land masses designated as unsuitable for timber production, but where harvest may occur. However, these acres are mostly in Inventories Roadless Areas or Potential Wilderness Areas, which make large scale commercial treatments problematic.

One other troubling issue in both Plans is the variance from Sustained Yield Limit (maximum amount of timber a Forest could produce on a long-term sustained basis-SYL) to the Projected Timber Sale Quantity (volume of timber a Forest plans on selling with the existing budget constraints-PTSQ). On the HLC, the SYL is 57.57 mmbf while the PTSQ is 27 mmbf. On the CG, the SYL is 38.25 mmbf while the PTSQ is 15 mmbf. AFRC believes that both Forests should strive to achieve their SYL to make sure the existing sawmilling, post and pole and other forest related infrastructure have the needed raw materials to continue operations. Additionally, AFRC believes that each Forest should make a departure from even-flow volume production in the short-term and ramp up management to address the severe insect and disease issues facing those Forests.

Good forest management and aggressively treating areas of insect and disease infestations can ultimately yield healthy stands of timber as the one above on the HLC Forest. Once the Plans are finalized we urge the Forests to use the flexibility they have to increase their timber harvests toward the Sustained Yield Limit, which will increase forest health, preserve the existing sawmilling infrastructure, and provide the economic stimulus needed by rural communities and counties in eastern Montana. /Tom Partin