



**VIA Email:** [melissajchristensen@usda.gov](mailto:melissajchristensen@usda.gov)

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Jo Christensen  
Three Mile GNA Project Coordinator  
Stevensville Ranger District  
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Stevensville, Montana 59870

Dear Jo:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Three Mile Good Neighbor Authority 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 Bitterroot 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 Stevensville Ranger District is planning a 238 acre Good Neighbor Authority project in the Upper Wheelbarrow and Spring Creek watersheds about 12 miles NE of Stevensville, Montana. The project will be done in conjunction with the Montana Department of Fish, Wildlife, and Parks (FWP) who is looking to treat about 1,500 acres of their property. The project will be a three agency project between the Forest Service, FWP, and Montana Department of Natural Resources. Further the project as proposed would implement treatments using Categorical Exclusion Authorities under the 2014 Farm bill. The landscape is a priority treatment landscape and Title VI of the Healthy Forest Restoration Act Section 303 provides for the designation of insect and disease treatment areas to increase forest resilience. Further, the treatment areas are entirely within the WUI as identified by the Bitterroot Community Wildfire Protection Plan.

AFRC supports this project which will conduct commercial thinnings on stands of ponderosa pine and Douglas-fir that have high stem densities and are a candidate for stand replacement wildfires. Further, this project will treat areas in the WUI to prevent wildfire and insects and disease spreading onto these lands from Forest Service lands. Finally, this area is in prime elk habitat and some of the treatments will benefit this species.

While AFRC supports the project, we offer the following comments which we believe will help the project.

1. First, AFRC is a strong supporter of the GNA program and also the use of the Farm Bill CE. This landscape is a very good opportunity for the Forest to access the scattered parcels of timberland using roads built by FWP to access their lands and Forest Service lands and administered under the GNA program.
2. AFRC encourages the Forest and FWP to heavily thin the existing stands of ponderosa pine and Douglas-fir in the project area to reduce the threat of wildfire and insects and disease. The included stands are already overstocked, impacted by dwarf mistletoe, western spruce budworm and bark beetles. By thinning to wider spacings, the stands become more vigorous and more timber is removed to improve the economics of the project.
3. AFRC would like the Forest to realize that the volume of timber coming from this project is very important for the livelihood of our forest products industry. The total project area including the FWP lands will be over 1,700 acres. This should yield a substantial volume of timber.

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 central and western Montana where the Three Mile GNA 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 and FWP to maximize the treatments on these acres 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 suggests that the Forest Service consider using regeneration harvests on part of the acreage to create an early seral component for big game forage. Many studies in recent years have pointed out that forage is the limiting factor for big game, not cover.
5. AFRC supports heavy thinnings of the shade-tolerant species such as Douglas-fir and leaving more fire resistant species such as ponderosa pine. The encroachment of Douglas-fir in the understory of these stands is part of the reason the stands are so dense and need thinning at this time. Further, AFRC supports leaving the larger dominant ponderosa pine, but we believe that older stands should be thinned as well to reduce the threat of catastrophic wildfire.

6. AFRC supports the road improvements in the area by FWP especially as they relate to providing access into the Forest Service parcels of land. These lands have been by-passed in recent years due to having no access, and using the GNA tool will allow access to these parcels without the Forest Service needing to attain a permanent road easement.
7. 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.
8. AFRC suggests the Forest and FWP 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.

In closing, AFRC thinks this project is an excellent use of the GNA program and the cross boundary approach with FWP. Further the use of the Farm bill CE is justified in this area because of the threat of wildfire and the conditions of the stands in the two drainages.

Thank you for the opportunity to provide scoping comments on the Three Mile GNA project, and I look forward to following the implementation of this project as it moves forward.

Sincerely,



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