



VIA Email: comments-northern-helena-lincoln@fs.fed.us

March 19, 2019

Michael Stansberry, District Ranger
Lincoln Ranger District
1569 Highway 200
Lincoln, MT 59639

Dear Michael:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Stonewall Vegetation Project Draft Supplemental Environmental Impact Statement (Stonewall 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 Helena-Lewis and Clark 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.

For history, the original Stonewall Vegetation Project Record of Decision (ROD) was signed by Helena- Lewis and Clark Forest Supervisor William Avey on August 25, 2016 and with it, the Final Environmental Impact Statement (FEIS) was released to the public. The project was preliminarily enjoined by a court order and therefore implementation had not begun. In July 2017, two wildfires ignited in the project area (Park Fire), eventually burning 18,000 acres, 13,390 acres of which were in the Stonewall project area or 56 percent of the project area. The fire burned all or portions of 16 treatment units, totaling 2,719 acres. Treatment units possessing viable harvest potential were analyzed in this Supplemental Environmental Impact Statement (SEIS).

The original purpose of the Stonewall project was to improve the mix of vegetation and structure across the landscape to make it more resilient to wildfire. AFRC supports this purpose as it applies to those acres not impacted by the 2017 Park Fire. The original purpose for the project was further justified by seeing what will happen to the landscape if it is not treated before a large landscape sized fire occurs.

AFRC supports the current purpose of the project which is to:

- Improve the mix of vegetation composition and structure across the landscape that is diverse, resilient, and sustainable to wildfire and insects.
 - o Enhance and restore aspen, western larch, and ponderosa pine species and habitats.
- Modify fire behavior to enhance community protection while creating conditions that allow the reestablishment of fire as a natural process on the landscape.
- Integrate restoration with socioeconomic considerations.
 - o Utilize economic value of trees with economic removal.

While AFRC supports this project as proposed, we offer the following comments and suggestions that we believe will enhance the Draft SEIS.

1. First and foremost, time is of the essence to move this project forward to enable the Forest and forest products industry to capture any economic value left in the dead and dying stands of lodgepole in the project area. AFRC supports Alternative 4 which is the proposed action based on the changed conditions in the project area. Alternative 4 consists of approximately 1435 acres of treatments that were analyzed under both Alternative 2 and 3 in the Final Environmental Impact Statement. These treatments include 407 acres of pre-commercial thinning, 360 acres of improvement cuts, 152 acres of seedtree, 95 acres of shelterwood cuts, 135 acres of clearcut, 18 acres of sanitation cuts, and 270 acres of low intensity prescribed fire. AFRC is disappointed that the DSEIS only contains 760 acres of commercial harvest-down from 2,607 acres in the original Alternative 2 of the original FEIS, however, that is the result due to impacts from the fire and other resource considerations.

The economics of this project are a concern to AFRC and our members. As pointed out in the SDEIS *“A major factor that influences the value of the timber particularly in the Stonewall Draft Supplemental Environmental Impact Statement Project area is the quality of the dead lodgepole pine. A significant percentage of the volume in this project comes from dead lodgepole pine. The mortality is a result of the mountain pine beetle outbreak that began in 2008. Following mortality lodgepole pine retains its value as a sawlog product for a time. As the tree begins to deteriorate that value as a sawlog diminishes, however the tree may still be viable for other less valuable products.”*

2. 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. 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 Stonewall 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.

3. To enhance the volume of green Douglas-fir, AFRC encourages the Forest to thin down to low residual basal area in units where Douglas-fir is growing. This not only enhances the volume of timber removed, it would further improve the economics of the project.

Table 30. Project Feasibility and Financial Efficiency (2016 dollars).

Category	Measure	Stonewall SEIS
Timber Harvest Information	Acres Harvested	755
	Volume Harvested (CCF)	11,877
	Base Rates (\$/CCF)	\$16.53
	Appraised Stumpage Rate (\$/CCF)	\$75.63
	Predicted High Bid (\$/CCF)	\$81.28
	Total Revenue	\$888,795.00
Timber Harvest & Required Design Criteria	Present net value	\$477,011.00
Timber Harvest & All Other Planned Non-timber Activities	Present net value	-\$34,441.00

Table 30 displays project feasibility and financial efficiency. It indicates that the project is financially inefficient (negative present net value) when including all activities associated with the analysis. Table 30 also indicates that Alternative 4 is feasible when considering only timber harvest and the required design criteria. AFRC believes that harvesting a larger component of green Douglas-fir would greatly improve the economics of the project and most likely fund ALL planned non-timber activities.

Further, as pointed out in the SDEIS, Douglas-fir Beetle Damage by fire has been shown to initiate Douglas-fir beetle attack. On July 23 and 24, 2018 the Forest Health Protection Missoula Field Office visited the Park Creek fire area, and a report of the trip indicates that:

- Douglas-fir beetle is currently attacking a number of larger Douglas-fir trees within the Park Creek fire area, 75 percent of which is within the Stonewall project area.
- Many of the stands within the fire area and within the wildland urban interface surrounding the fire area are highly susceptible to Douglas-fir beetle-caused tree mortality.

- Beetle may move into susceptible green stands surrounding the fire perimeter beginning in spring 2020.

All of this information indicates a need to focus more on thinning existing green Douglas-fir stands.

4. AFRC supports the Forests request for a site specific, non-significant forest plan amendment for the Stonewall project that would continue to provide a one-time exemption for the following standards in the Beaver Creek herd unit only:
 - Forest-wide Standard 3 for hiding cover on summer range (USDA Forest Service 1986, page II/17) for the Beaver Creek elk herd unit and thermal cover on winter range in the Beaver Creek herd unit;
 - Forest-wide Standard 4a for open road densities during the big game hunting season (USDA Forest Service 1986, pages II/17 to 18) for the Beaver Creek elk herd unit;
 - Management Area T-2 standard for thermal cover on winter range (USDA Forest Service 1986, page III/35) within the management area;
 - Management Area T-2 and T-3 standards for hiding cover in timber harvest openings (USDA Forest Service 1986, pages III/35 and III/39) within the management areas within the project boundary.

Managing the dense stands of vegetation and reducing the amount of thermal cover for elk is an important need and consideration. A greater loss of cover can occur when stands are not mechanically treated but rather consumed by wildfire.

5. AFRC encourages the Forest to use regeneration harvests to remove unhealthy trees, establish new stands of fire resistant species and to promote early seral plant species much needed by deer and elk populations. These units could be strategically placed in the older stands of green lodgepole and unhealthy stands of larger Douglas-fir to capture economic value, reduce fuel loading and promote early seral plant stages. Regeneration harvests are also much more economical rather than removing lesser volumes of dead lodgepole in thinnings.
6. 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.
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 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.
9. AFRC believes the Forest has done an acceptable job of analyzing the impacts to lynx in this project area following the Park Fire. The U.S. Fish and Wildlife Service issued a Biological Opinion on October 18, 2017 which is good through the year 2022. The Biological Assessment / Biological Opinion consultation represents the first tier of a tiered consultation framework, with each subsequent project that may affect lynx critical habitat as implemented under the Northern Rockies Lynx Management Direction being the second tier of consultation referencing back to the Biological Opinion.

In closing the Stonewall project unfortunately points out what can happen when needed treatments are held up in court and subsequently impacted by catastrophic wildfire. The remaining project is only a skeleton of the original project, but the need to move it forward is urgent to capture what value remains in the standing timber to help offset other resource repair and needs.

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

Sincerely,

A handwritten signature in blue ink that reads "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Tom Partin
AFRC Consultant
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