



VIA Email: comments-northern-lewisclark-white-sulphur-sprg@fs.fed.us

May 27, 2019

Carol Hatfield, District Ranger
Belt Creek-White Sulphur Springs District Ranger
White Sulphur Springs Ranger District
204 W. Folsom
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Dear Carol:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Horsefly Vegetative Project. I realized that scoping for this project closed about a month ago, but we have just recently started doing work in Montana for our member Sun Mountain Lumber, and I would appreciate if you would accept these comments and include them in the record. Further, I would like to be notified when the Draft EA for the project comes out.

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.

The project area, approximately 20,100 acres, is located within the Miller Gulch and Newland Creek drainages in the Little Belt Mountains. I am writing to basically support the work that you have proposed to do in this project area. AFRC supports your listed purpose and need for this project which is:

- Improve Forest Health and Landscape Resiliency
- Reduce wildfire hazards

- Provide wood products to local and regional economies

In addition to supporting the Purpose and Need for this project, AFRC offers the following suggestions that we believe might make the project more workable.

1. First, we are pleased to see the Forest treating 13,410 acres of the 20,100 acre project area. Of those treated acres, 10,050 acres will be commercially harvested. This is very important for the sawmilling infrastructure that depends on projects like Horsefly to maintain operations. 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 Montana where the Red Rocks 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.
2. With the conditions of the stands of dead and dying lodgepole, Douglas-fir, ponderosa pine and other species AFRC supports the use of regeneration harvests to establish new and healthy stands. In the areas where the Forest is looking at doing Intermediate harvests, we suggest opening the stands up to a wide spacing only leaving about 20 trees per acre. This will improve the vigor of the remaining trees and further reduce the risk of wildfire.
3. AFRC supports the removal of encroaching coniferous species to promote the health in stands of aspen. AFRC supports removing conifer species by as much as two or three tree lengths to improve these aspen stands.
4. AFRC supports harvest units greater than 40 acres in size to address forest health and fuels issues. Further AFRC agrees with the need for a project specific amendment to the Forest Plan standards pertaining to elk hiding cover, elk winter range, elk thermal cover and old growth may be necessary in order to meet the project's purpose and need.
5. AFRC requests the Forest work with the purchaser to ascertain what is still merchantable volume especially in stands of lodgepole pine. Much of this volume has been dead for many years, and the non-saw component can be very high. The market for post and poles is very shallow and the distance to haul chip logs becomes cost prohibitive. Therefore, it might become necessary to allow decking of dead lodgepole without required removal to get the work done and acres treated economically. Flexible top sizes also becomes very important as trees deteriorate.
6. 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.

7. 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.
8. AFRC supports using approximately 45 miles of temporary road (this will be a combination of newly constructed temp road and temp use occurring over an existing road or trail template). All temporary roads constructed will be decommissioned no later than three years after the date on which the project is completed. AFRC supports decommissioning roads using blockades or other structures so they can be used in the future and not road obliteration.
9. The Forest may consider using shaded fuel breaks along major travel routes such as highway 89. This has become a very accepted practice and provides a good fire break in highly used recreation and travel areas.
10. 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 Horsefly Vegetation Project. I look forward to following the implementation of this project as it moves forward.

Sincerely,



Tom Partin
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