



F.H. STOLTZE LAND & LUMBER COMPANY

Lumber Manufacturers

Box 1429 Columbia Falls, MT 59912
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November 26, 2013

Faye Krueger
Regional Forester
Northern Region

RE: Objection to Land Management Plan, 2013 Revision, Kootenai National Forest

Objectors Name: F.H. Stoltze Land & Lumber Co.

Address: PO Box 1429 Columbia Falls, MT 59912

Phone # (406)-892-7005

E-Mail: pmckenzie@stoltzelumber.com

Name of Lead Objector: Paul R. McKenzie

Name of the plan revision being objected to and the responsible official:

Land Management Plan, 2013 Revision, Kootenai National Forest

Responsible Official: Faye Krueger – Regional Forester, Northern Region.

Statement of issues and or parts of the plan revision to which the objection applies:

FW-DC-TBR-01 Production of timber contributes to ecological, social and/or economic sustainability, and associated desired conditions. *A sustainable mix of timber products (including both sawtimber and non-sawtimber) is offered under a variety of harvest and contract methods in response to market demand.....*

We object to the wording stating: “A sustainable mix of timber products (including both sawtimber and non-sawtimber) is offered under a variety of harvest and contract methods in response to market demand”. We feel that in light of the recently completed studies of timber capacity in the KNF Impact Zone and *Timber Use, Processing Capacity and Capability to Utilize Small Diameter Timber within USFS Region One Timber processing Area*, additional language should be included to ensure the mix of timber products is roughly equivalent to the processing capacity of the Impact Zone.



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Statement explaining the objection and suggestion of how the proposed plan decision may be improved:

1. Appendix C – Pg 170 of the Land Management Plan acknowledges “...less than 1 percent (714mcf) of processed volume comes from trees less than 7 inches dbh. Trees less than 7 inches in DBH will produce primarily non-sawlog materials. According to the KNF Capacity and Capability Revised Report Dated Aug 15, 2012, pg 5 Table 1 38 of the 39 processing facilities within the KNF Impact Zone utilize sawlog material, only one utilizes non-sawlog material. Pg 7 Table 3 of the same report 76,177MCF of processing capacity using sawlog sized material and only 1,122MCF of capacity for non-sawlog sized material. This would indicate that the “market demand” for non-sawlog products for the impact area would be between 1 and 2 percent.
2. These studies indicate that 98-99% of the annual timber harvest should be in sawlog products in response to market demand and regional capacity for processing.
3. The KNF consistently includes between 30% and 50% non-sawlog products in their annual timber sale mix. This is not “in response to market demand” and is not consistent with the information provided in the timber capacity studies for either the KNF or Region one. Especially since the closure of Smurfit Stone Container in December 2010, the markets for non-sawlog material have been drastically reduced. To date the KNF has not responded to the market change in the impact area.
4. The ROD states that “*The revised plan also considers utilization of non-sawlog material in keeping with National and Regional FS direction to increase availability and utilization of biomass. Not only does this support non-saw/biomass material markets,*” We question what non-saw/biomass markets are being referenced as they were not identified in either of the Capacity and Capability studies completed in the last two years.
5. It is not appropriate to judge the market for non-sawlog based upon the fact that sales with high percentages of non-sawlog continue to sell. This is not based upon the market for non-sawlog, but rather the great demand for the sawlog material in the sale that is held hostage by the non-sawlog component. The mandatory non-sawlog component of these sales are only tolerated due to the overarching demand for the sawlog material and the unavailability of such sawlog material without enduring the burden of the mandatory non-sawlog
6. We don’t disagree that utilization of non-sawlog meets other management objectives and when markets exist utilization of such is appropriate. However, it should be optional, not mandatory and should NOT comprise 30-50% of the annual sale volume when it represents only 1% of the impact zone capacity. Remember, it is OK to overachieve annual timber harvest volume goals especially when markets exist and accomplishments of desired future condition are improved.

Suggestion of how the proposed plan decision may be improved.

Modify **FW-DC-TBR-01** to include the following language regarding the mix of timber products. *A sustainable mix of timber products (including both sawtimber and non-sawtimber) is offered under a variety of harvest and contract methods in response to market demand and in proportions roughly equivalent to the processing capacity and capability for the Kootenai National Forest Impact Zone.*

Link to previously submitted formal comments:

See comments dated May 4, 2012 submitted on behalf of F.H. Stoltze land & Lumber Co. by Brian Hobday, Mark Boardman and Chris Damrow. Page 2 with comments regarding “timber program should not include an emphasis on non-sawlog product removal.”

Signature:



Paul R. McKenzie
Lands & Resource Manager
F.H. Stoltze Land & Lumber Co.



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Statement of issues and or parts of the plan revision to which the objection applies:

FW-OBJ-TBR-01. Annually offer timber for sale at the estimated predicted volume sold of 47.5MMBF.

We object to the inclusion of an objective that sets a budget constrained timber sale volume target substantially below the stated ASQ and which will also result in shortfalls on all fronts in meeting the stated desired future conditions, both ecological and societal, for the rest of the forest plan.

Statement explaining the objection and suggestion of how the proposed plan decision may be improved:

- 1.) Inclusion of a budget constrained target in addition to the calculated ASQ in the revised forest plan is inconsistent with the scope and intent of the forest planning process. CFR36.219 does not include direction to set plan implementation objectives based on perceived budget limitations. Nor does it direct the agency to justify underachievement of land management needs based upon perceived or real budget constraints. The planning rule does direct the planning process to



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“...maintain or restore ecological sustainability...”. In that context, budget constrained targets should not be included in the forest plan document.

- 2.) Budget constraints have no basis in the related laws and regulations identified in the ROD and therefore should not be the basis for any limited target setting.
- 3.) Program budgets and annual sale targets are beyond the direct influence of the individual forest and are set at the regional and national level. The forest plan should be a guiding document that is the basis for requesting funding to meet ecological and societal needs. Budgeting and funding of the National Forest System is theoretically in response to those ecological and societal needs as have been identified in the various forest plans. Inclusion of lower targets based upon current budgets gives the wrong impression to policy makers and those setting budgets and does nothing to help the forest meet ecological and societal goals. You will certainly get what you ask for, or less.
- 4.) A stronger and more useful message would be a statement and analysis of the impacts of underachievement of land management activities to meet the ecological and societal goals. This statement would then be used to support the need for additional funding to meet the goals and objectives of the plan rather than to justify underachievement. While it may be appropriate to discuss the impact of budgets on the ability of the forest to fully implement the plan in the environmental analysis, it is inappropriate to include objectives in the forest plan that are far below what is needed to meet ecological and societal needs.
- 5.) FW-OBJ-TBR-01 is entirely inconsistent with FW-OBJ-Veg-01 which states a goal of 250,000 acres of treatment per decade to maintain and or improve forest resilience, natural diversity, and productivity. Even with full implementation of the selected Alternative B modified and full implementation of the calculated ASQ for that alternative, FW-OBJ-Veg-01 will not be met. The sensitivity analysis found in Appendix B pg 40-41 clearly identifies the budget constraint run as having the highest “penalty points” for meeting desired condition. How do you justify these inconsistencies?
- 6.) The process of using the last three years of budgets and cost as the basis for setting FW-OBJ-TBR-01 is unsupported by the EIS analysis. What were the scientific processes used to determine the last three year budget period is in anyway reflective of the historic, let alone future funding trend? The budget constraint process is subjective and arbitrary at best and cannot adequately predict future budgeting. Improvements in efficiencies in timber program implementation have been identified by the Washington Office USFS as a high priority. Expectations to do more with less are a constant message being offered by the Chief, yet the KNF has arbitrarily decided that their timber program unit cost will stay the same and that funding will stay the same or decrease? There is no basis for such a judgment call and it should not be included in a forest planning document.

- 7.) We strongly disagree that there are provisions in the plan that would provide for an increased timber program if budgets were to increase. The language is simple and sets an annual timber sale target of 47.5mmbf. There is no doubt in my mind this number would be used against the Forest and will serve as yet another arbitrary limitation that will confine the ability to manage our public lands.

Suggestion of how the proposed plan decision may be improved.

Remove FW-OBJ-TBR-01 (and all other budget constrained objectives) from the revised forest plan. If an annual timber sale volume objective is deemed as an essential element, include an objective that best meets the goals of managing the forest to meet the desired future condition as described in the rest of the plan. Based upon the environmental analysis and projections for meeting desired future condition targets, we would expect that annual sale goal to be near the calculated ASQ. A discussion in the ROD that justifies why full funding of the timber program to meet a timber harvest level near the ASQ is consistent with the overall goals of the forest plan is appropriate. Disclosure of the effects of not fully implementing a timber program near the ASQ due to budget limitations may also be appropriate.

Link to previously submitted formal comments:

See comments dated May 4, 2012 submitted on behalf of F.H. Stoltze land & Lumber Co. by Brian Hobday, Mark Boardman and Chris Damrow. Page 2 with comments requesting an annual timber sale goal of near the ASQ to meet forest plan objectives.

Signature:



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Lands & Resource Manager
F.H. Stoltze Land & Lumber Co.



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Statement of issues and or parts of the plan revision to which the objection applies:

MA2-STD-TBR-01 Wild: Timber Harvest is not allowed in eligible wild river segments

We disagree with this statement based on the fact that the process used to identify “wild” river segments is not entirely consistent with the eligibility requirements and to treat such segments as wild prior to official designation is disingenuous. We feel that there may be situations where some type of limited timber harvest may be necessary to retain the unique values of the river segment. Also, we are fairly confident that some if not all of these segments identified may fail to meet final designation criteria and this level of hands off designation may inhibit achievement of desired conditions for water quality and aquatic habitat.

Statement explaining the objection and suggestion of how the proposed plan decision may be improved:

Specifically, the attributes of the proposed “Wild” segments in the Big Creek Drainage seem to be inconsistent with the criteria for such designation established by the Wild and Scenic River Act of 1968. Furthermore the analysis in the EIS seems to be inconsistent



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with the Initial Assessment for Eligibility done in 2005 where most of the segments were not ranked for either Recreation or Scenic value, yet in the final EIS, they are. It would appear this change was made arbitrarily based upon individual judgment calls. That being said, the chance of that judgment call changing again when the segments are evaluated for official designation is relatively high. By treating these segments as if they were "Wild" and limiting options for management, you are setting the stage for failure to meet desired condition goals surrounding water quality and aquatic habitat should natural events (fire, wind throw, insect and disease) affect these segments where human intervention (salvage and rehabilitation) could lessen resource impacts.

Suggestion of how the proposed plan decision may be improved.

We do not feel that many of the segments listed as eligible will ever be officially designated as Wild or Scenic, because they do not meet the strict criteria under the 1968 act. To that end, we disagree with treating these areas as de-facto wild or scenic segments and suggest the following modification to the Plan.

Modify **MA2-STD-TBR-01 Wild:** to include the following language: *Timber harvest is allowed to maintain or restore the values for which the eligible wild river was identified. Timber harvest is not scheduled and does not contribute towards the allowable sale quantity.*

Link to previously submitted formal comments:

See comments dated May 4, 2012 submitted on behalf of F.H. Stoltze land & Lumber Co. by Brian Hobday, Mark Boardman and Chris Damrow. Page 4 with comments questioning the eligibility list and specifically the Big Creek drainage.

Signature:



Paul R. McKenzie
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