



February 12, 2021

Ron Hecker
District Ranger
P.O. Box 168
Ashland, MT 59003

Dear Ron:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the South Otter 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 Custer-Gallatin 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 South Otter Restoration and Resiliency Project encompasses 293,500 acres on the southern part of the Ashland District. The purpose and need for the Project is to improve forest resiliency in ponderosa pine forested areas, provide for biological and structural diversity, reduce the risk of largescale catastrophic wildfire, and reduce fuel loads in existing forested stands.

AFRC's knowledge of the Project comes from reading the scoping document and by personal visits to the area. The project area is dominated by lower quality ponderosa pine that has poor form class and very little grade for lumber products. Besides the timber being lower quality, the distance to any manufacturing center will also be problematic in making this Project economically feasible.

AFRC supports the Purpose and Need for the Project which is to improve or maintain wildlife habitat, refresh native grasslands and forested areas that are structurally diverse, to provide for local jobs, services, and products.

Below are some comments and suggestions that AFRC believes might strengthen and provide support for the Project.

1. First, we are very pleased to see that providing jobs, services and products are part of Purpose and Need. To support this, we encourage the Forest Service treating as many acres as practical when preparing the EA. The expense of these planning documents is high, and we feel it is important to get as much work done using this document. Treating more acres also adds to the timber volume that will be produced. The National Forests in Montana are very important for providing the raw materials that sawmills within the State need to operate. The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Specifically, studies in Montana have shown that 12-15 direct and indirect jobs are created for every one million board feet of timber harvested. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. It should also be pointed out that raw materials from this Project may be purchased by sawmills in Wyoming or South Dakota, so this is truly a Project of regional significance.

Additionally, 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 annually. While most of the industry is centered in western Montana, this Project is crucial to the infrastructure located in eastern Montana, Wyoming, and South Dakota. With the closure of the R-Y plant in Townsend, Montana the availability of raw material is even more important to keep existing mills operating. The timber products provided by the Forest Service are crucial to the health of our membership and the counties and communities where they are present. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the way these products are permitted to be delivered from the forest to the mills.

Further, AFRC members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present day needs but also important for needs in the future. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of importance is how those treatments effect the long-term sustainability of the timber resources on Forest Service managed land. By not managing the maximum number of acres today, will impact the ability to produce the timber needed in the future.

- On the Ashland Ranger District, large wildfires burned 66 percent of National Forest System land between 1988 and 2012, reducing the extent of forest cover. The Chart below outlines the planned harvest areas by silvicultural prescription. While AFRC supports this level of management it represents less than 10% of the Project area.

Table 2: Proposed treatments for the South Otter project

Non-Commercial Treatments	Approximate Acres
Prescribed Fire	293,000
Pre-commercial Thinning	15,000 (250-500 annually)
Tree Planting	20,000 (600-1300 annually)
Commercial Treatments	Approximate Acres
Commercial Thinning with Regeneration Cuts/Seed Tree	22,600 (*1,130-7,910)
Improvement Cuts	4,655
Total	27,315

The District is proposing thousands of acres of non-commercial treatments, which will require significant funding. AFRC understands that the amount of forestland capable of supplying commercially viable products has been reduced due to wildfire; therefore, we suggest the District consider every possible acre for commercial treatment to help subsidize the proposed non-commercial treatments.

AFRC supports the large acreage of commercial thinings. This is the best way to treat stands of ponderosa pine and to encourage growth of residual trees into the large tree category. However, the plan calls for generally only removing 20-40 percent of the commercial size trees during commercial thinning. Due to the dry nature of the site and productivity, this percentage may need to be increased to achieve desired results for residual stand growth. AFRC supports the use of improvement cuts especially in areas where insects are present, and openings need to be created to remove infected or unhealthy trees.

- To make this Project economically feasible the District should adjust their minimum specifications for what constitutes a sawlog. The size of the trees and the distance to transport to a milling facility will require a larger piece size. At a minimum, AFRC suggests raising the minimum dbh for harvest trees to 12 inches and the minimum top size to 8 inches. Not only will this modification align with current industry standards, it will also create the best opportunity to ensure an economically viable project. This will also help in thinning trees in the mid-size class where there is an overabundance of middle size class ponderosa pine trees (10-15" DBH) and a shortage of large diameter class trees (>15" DBH) as the chart below points out.

Size Class			
Seedling and Sapling (<5")	5-35%	38%	33%
Small Tree (5-9.9" DBH)	1-25%	6%	10%
Medium Tree (10-14.9" DBH)	1-25%	48%	51%
Large Tree (15"+ DBH)	55-95%	8%	6%

4. A substantial portion of this project area falls within the Powder River County and Rosebud County Community Wildfire Protection Plans. These plans encourage the USFS staff to consider potential effects on the Wildland-Urban Interface (WUI) in their fuel reduction programs, and to use county values at risk in considering project locations. AFRC recommends commercially treating as many acres in the WUI as practical and thinning the trees to a basal area of 40 sq. ft. per acre.
5. The Transportation Plan calls for temporary roads for access to vegetation treatment units be constructed for access to treatment units, then decommissioned following completion of project activities. Road and motorized trails may be evaluated for temporary closure or for alternative needed to maintain or enhance big game habitats during implementation. To the extent possible, temporary road and haul route locations would be selected to maintain big game security and reduce disruption of other wildlife habitat during project activities.

AFRC believes that a significant factor contributing to increased fire activity in the Region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to attack nascent fires quickly and directly. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.

If the Forest Service proposes to decommission, abandon, or obliterate road segments from the South Otter area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will enable fire fighters quicker and safer access to suppress any fires that are ignited.

We would like the District to carefully consider the following three factors when deciding to decommission any road in the project area:

- Determination of any potential resource risk related to a road segment.
- Determination of the access value provided by a road segment.
- Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.

6. AFRC would like to remind the District that there are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland. The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season).

We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the result to be rather than prescribing how to get there. There are a variety of operators that work in the Custer-Gallatin National Forest market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. We appreciate the District looking at allowing timber felling ground equipment on slopes up to 45%, and we would like skidding equipment to be allowed on slopes up to 45% as well.

AFRC would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has a limited operating time at best, and further reductions such as these only makes surviving in the logging business that much more difficult. AFRC is concerned about logging operations being prohibited during the first two weeks of the general rifle season in order to maintain big game habitat capability and hunting opportunity. This is during the prime operating season and either means move in and move outs (mobilizations) or shutdowns. Identifying one or two units that might be operated during hunting season might be reasonable option. Also, if approved, contractors would not be permitted to hunt, transport hunters, discharge firearms or transport big game with vehicles within the closed areas when operating these units.

7. In reviewing the scoping documents and proposed plan, AFRC believes that an EA will be adequate for analyzing the impacts of this Project. The real threat to the area is wildfire and this Project will help in healing past fires and for preventing future fires, thus there should be a finding of no significant impact in your analysis.

8. AFRC would like to encourage the Ashland District to consider several documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large- scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- a. Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when compared to no harvest by the end of the simulation.
- b. This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- c. Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. *Ecosphere* 7(1):e01224. 10.1002/ecs2.1224.

Thank you for the opportunity to provide scoping comments on the South Otter Project. I look forward to reviewing the Draft EA when it is released.

Sincerely,



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