



VIA Email: appeals-northern-regional-office@usda.gov

March 10, 2021

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments during the Objection period for the Redd Bull 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 Lolo 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.

AFRC is not writing to submit a formal objection, since the objection period is open, but rather to voice our support for the Project and specifically for implementation of Alternative 2. AFRC has been very invested and supportive in the development of this Project dating back to field trips on July 18, 2017 and June 29, 2018 as well as submitting scoping comments on August 22, 2019 and Draft EA comments on July 16, 2020. On our field trips we worked with the District to look at the feasibility of treating additional lands in the project area. We appreciate seeing more acres included following those meetings that were outlined in the scoping document. Although the Draft EA had a reduction of commercially treated acres from scoping, we still support the District's Proposal.

While AFRC supports the Project, we would like the Forest to consider the following comments for implementation of not only Redd Bull, but for other projects coming up on the Lolo National Forest.

1. Driving the need for management in this Project area is the fact that fire exclusion combined with natural vegetation development and past timber harvest has resulted in changes to the vegetative patterns on the landscape. Over the last 100 years, less than five percent of the Redd Bull area burned in wildfire, creating heavy fuels loadings. Increased tree density and tree succession has resulted in a higher susceptibility to insects, disease, and drought as trees compete for sunlight, water, and nutrients. Additionally, approximately 16 percent of the Redd Bull project area is in Strategic Wildfire Management Zone 1, meaning all fire starts are considered a primary threat to high values at risk.

While the District reduced the footprint of acres being treated from scoping to the Draft EA, AFRC and our members maintained a dialogue about possibly having optional acres for treatments that could be included in the Project if economics and forest health needs make those acres practical to enter.

AFRC continues to support maximizing treatment of appropriate acres and for that reason we still support Alternative 2. We remind the Forest that the project is located within Mineral County, of which 82 percent of the land base is NFS land. Thus, local communities have significant social and economic ties to the Forest. The National Forests in Montana are very important for providing the raw materials that sawmills within the state need to operate since so much of the Forests are managed by the Forest Service. 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 annually. Most of the industry is centered in western Montana where the project is located. 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.

2. To get the needed work completed, AFRC supports the Forest Plan Amendment that would include a proposal to amend the Lolo Forest Plan by changing the management area designation of approximately 198 acres of NFS land from Management Area 27 (land where timber management was not economically or environmentally feasible at the time the Forest Plan was established in 1986 due to physical features of the parcels) to Management Area 25 (lands with a medium degree of sensitivity, which are available for timber management). This amendment is needed for approximately 135 acres of the

proposed timber harvest treatment. Again, the number of manageable acres in the Project area could be increased if more acres had this Management Area change from MA 27 to MA 25. An additional management area allocation change is included in the Draft Decision for the 15 acres associated with the Little Joe campground to provide consistency with how the site is managed which AFRC also supports.

3. An important consideration of this Project is benefits to wildlife. AFRC supports implementing regeneration harvests that are larger than 40 acres in size. These actions must get Regional approval, but due to the needs of the stands to improve forest health, and for the creation of early seral species for wildlife, this is needed. The Forest has indicated that 12% of the project area is allocated to big game winter range, and forage is an important need in this area.
4. AFRC supports management in the Marble Point IRA. Since inventoried as roadless in 1979, roughly 2,500 acres (20 percent) of the Marble Point IRA was developed in the late-1980s to mid-1990s by timber harvest and road construction. The developed portion of the IRA does not currently meet the criteria for placement on the potential wilderness inventory. This would preclude the developed portion of the IRA to meet the criteria for placement on the potential wilderness inventory. As stated earlier, AFRC supports Alternative 2 and harvesting timber on 1,425 acres in the IRA.

Table 3.10-2: Activities in IRAs by Alternative

Activity	Marble Point IRA		
	Alt 2	Alt 3	Alt 4
Vegetation Treatments			
Individual Tree selection for fuels reduction (acres)	466	0	466
Intermediate Harvest (acres)	277	0	208
Regeneration Harvest (acres)	682	0	138
Timber Harvest total (acres)	1,425	0	812

The Roadless section of the Draft Decision was updated to further clarify consistency with the 2001 Roadless Area Conservation Rule in response to public comments. AFRC appreciates the District revising the IRA map to display the existing classified roads more clearly and past and proposed timber harvest within the Marble Point Inventoried Roadless Area.

5. AFRC would like to remind the District that we support most of the Road Management Plan as proposed since the area covers such a large geographic footprint a considerable amount of road miles are needed. The plan calls for maintenance on 209 miles of road, 13 miles of new construction of permanent roads, and 12 miles of temporary road construction. AFRC is very concerned, however, about the amount of road decommissioning in the Project area as listed below:

Table 2-4: Road Decommissioning and Storage Levels for *Existing* Roads by Alternative

Road Treatments	Alternative 2 (miles)	Alternative 3 (miles)	Alternative 4 (miles)
Road Decommissioning	230	228	225
3D	22	1	22
5	47	92	42
3DN (Administrative)	161	135	161

Decommission Level 3D: Closure activities would include road surface ripping (decompaction) along the entire length of the roadway, placement of woody debris on the road surface, removal of structures (culverts, bridges) and reshaping of stream crossings to natural contours, installation of water bars at frequent intervals, seeding of the road prism, and recontouring the entrance of the road. On flatter terrain, boulders could be used to close the road entrance.

Decommission Level 5: Closure activities would include full recontouring; replacing overburden (excavated soils) back onto the road prism to return the ground to its natural contour, removal of structures (culverts, bridges) and reshaping of stream crossings to natural contours, placing woody debris upon the disturbed area, and seeding and fertilizing the disturbed soil.

Our concerns regarding the proposed road decommissioning are twofold. First, we are concerned with the costs associated with decommissioning over 200 miles of roads to the standards being proposed as indicated in your economic analysis. We believe there might be better options such as gating, placing boulders to prevent access or ripping the first parts of the roads only.

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.

Second, we are concerned with the impacts to access that will result from such a vast level of decommissioning. An intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The road decommissioning proposed in the Redd

Bull EA likely represents a **permanent** removal of these roads and likely the deferral of management of those forest stands that they provide access to. The land base covered in the Redd Bull Project area are to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

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).
6. AFRC is concerned regarding the results of the Economic Analysis conducted for the Project. We are pleased to see that all action alternatives are financially efficient (positive PNV) for the timber harvest with designed criteria. However, they are financially inefficient (negative PNV) when the other resource activities are added to the timber harvest. See Graph 3.91 below:

Table 3.9-1 Project Feasibility and Financial Efficiency Summary (2018 dollars)

Category	Measure	Alternative 2	Alternative 3	Alternative 4
Timber Harvest Information	Acres Harvested*	13,136	10,701	12,514
	Volume Harvested* (CCF)	223,329	181,917	212,755
	Base Rates (\$/CCF)	\$17.35	\$20.12	\$19.54
	Appraised Stumpage Rate (\$/CCF)	\$19.17	\$17.74	\$19.89
	Predicted High Bid (\$/CCF)	\$24.82	\$23.39	\$25.54
	Total Revenue	\$5,542,000	\$4,255,000	\$5,434,000
Timber Harvest & Required Design Criteria	PNV	\$412,000	\$109,000	\$527,000
Timber Harvest & All Other Resource Activities	PNV	-\$8,906,000	-\$8,638,000	-\$8,627,000

Alternative 2, which we support, will yield \$5.5 million in revenue. The PNV for timber harvest and required design criteria remains positive, however the PNV for All other Resource Activities will be a deficit. The proposed work that is underfunded includes other resource activities (e.g., non-commercial thinning, prescribed burning, watershed, and recreation improvements including road decommissioning).

AFRC believes the Forest needs to reanalyze what post-harvest work can realistically be completed from the revenues generated from stumpage. **This goes back to our concern about how many miles of roads will be decommissioned and other proposed work.** We think the Forest Service should emphasize and illustrate the fact that \$5.4 million will be generated from stumpage and that these funds will enable a significant amount of post-harvest service work to be implemented. This illustration would clarify the economic

viability of the timber harvest component while noting how those associated funds could assist in service work.

We believe the Forest did a good job of analyzing how many full and part-time jobs will be created. We are estimating that the Redd Bull Project might yield 80 mmbf and if every 1 mmbf creates 15 jobs that would be 1,200 jobs created. Your analysis shows 1,405 jobs which is certainly realistic. This is a very significant impact to employment in both Sanders and Mineral County.

7. AFRC continues to believe that the use of shaded fuel breaks is viable especially near the WUI and along the major roads in the project area. These fuel breaks have been shown to be effective in slowing or stopping wildfires while at the same time improving the health and vigor of leave trees. Where possible, these could be incorporated into proposed timber harvest units.
8. As the Project moves to implementation, AFRC suggests consideration of the use of designation by prescription (DxP) for any commercial harvests. We believe that better results can be achieved in a much more efficient and cost-effective manner by utilization of basal area thinning where end results are defined with DxP. On our recent field tours, we discussed using DxP and the Forest thought it had good potential.

AFRC has been very involved with the development of this Project and we want to thank the District for incorporating some of our earlier suggestions into the Draft Decision. As we mentioned above, should this Project go to an Objection Resolution meeting, we would like to be part of those discussions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin", with a stylized, flowing script.

Tom Partin
AFRC Consultant
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Portland, Oregon 97239