

## Norton, Michelle - FS, HAMILTON, MT

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**From:** Tom Partin <tpartin@amforest.org>  
**Sent:** Friday, May 6, 2022 4:01 PM  
**To:** FS-comments-northern-bitterroot-stevensville  
**Cc:** [REDACTED]  
**Subject:** Bitterroot Front Scoping Comments  
**Attachments:** Bitterrot Front Scoping Comments.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Entered Proj Record

Attached are AFRC's scoping comments for the Bitterroot Front Project. Overall this will be an excellent and much needed Project to reduce fuel loadings.

Thank you,

Tom Partin  
AFRC Consultant  
[REDACTED]  
Portland, Oregon 97239  
[REDACTED]





**VIA Email:** [comments-northern-bitterroot-stevensville@usda.gov](mailto:comments-northern-bitterroot-stevensville@usda.gov)

May 6, 2022

Stevensville Ranger Station  
Attn: Steve Brown  
88 Main Street  
Stevensville, MT 59870

Dear Steve:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Bitterroot Front 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 Bitterroot 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 143,983 Bitterroot Front Project is located along the eastern face of the Bitterroot Range from the Bitterroot National Forest boundary at the northern end of the Stevensville Ranger district to the southern end of the Darby Ranger District near Trapper Creek. AFRC and several of our members participated in a field trip to the Project area and looked at a good portion of the land in June 2021.

A large portion of the Project area falls within the Community Wildfire Protection Zone (CPZ) and Wildland Urban Interface (WUI). The Bitterroot Front Project lies within an area that has been identified as having 5 of the top 10 fire sheds facing the most wildfire risk in Montana. This Project is being proposed to help assure future wildfire suppression operations to protect critical infrastructure that occur in or adjacent to these treated landscapes are successful.

AFRC supports the Project's objectives which include:

1. Reduce Fuels
2. Improve landscape resilience to disturbances (such as insects, diseases, and fire) by modifying forest structure and composition.
3. Seek Wildlife habitat improvement opportunities.
4. Contribute to the local economy and forest products industry through fuels reduction activities and timber production.
5. Improve other Natural Resource Objectives.

While we support the Project's objectives, we offer the following comments that we believe will improve the scoping information that you have provided.

1. AFRC and our members are very pleased to see that contributing to the local economy and forest products industry through fuels reduction is one of the objectives. Furthermore, the 55,133 acres that you have identified as suitable for commercial harvest will greatly help sustain the existing milling infrastructure. 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. Without the raw material sold by the Forest Service, DNRC, and private landowners, these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, the industry 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 manner in which these products are permitted to be delivered from the forest to the mills.
2. The Forest has identified approximately 13,000 acres within inventoried roadless areas that need treatment. AFRC supports treating these acres and acknowledges that no roads will be built to facilitate the thinning of small diameter timber and vegetation. Managing stands in the roadless areas to reduce fire risk through commercial density reduction is critical as several of these areas are in close proximity to the CPZ and/or WUI. Below is a photograph of one of the roadless areas—note the thick vegetation and heavy fuels. On our field trip we saw several large old wildfire footprints. Historically, many fires originate in wilderness or roadless areas at higher elevations and then expand down slopes by strong west winds. The intent of active management in the IRA's is fuels reduction to assist in containment of fires originating in the IRA and prevent them from burning into the lower landscapes where communities are located. AFRC believes this is much needed.



3. The table listed below shows the fire regime data for the area and how many years acres have gone without having fire across the landscape.

**Table 1. Fire regime data for the project area.**

<b>Fire Regime Group (year interval range)</b>	<b>Total Acres by Fire Regime (Percent of Project Area)</b>	<b>Missed Fires (Average Fire Free Period)</b>	<b>Acres Burned 1889-2018</b>	<b>Percent of Acres Burned vs Historical Regime 1889-2018</b>
I (0-35 years)	47,874 (33%)	6.8 (19 years)	13,878	4%
II (0-35 years)	5,575 (4%)	6.8 (19 years)	1,907	3%
III (35-100 years)	41,406 (29%)	4.6 (28 years)	11,007	8%
IV (35-200 years)	47,523 (33%)	3.9 (33 years)	16,996	9%
V (200+ years)	234 (0.2%)	3.9 (33 years)	59	7%

This data indicates limited fires burning across the landscape within the Bitterroot Front area, and we strongly believe we are on borrowed time. Several thoughts come to mind. First, the District should treat all available acres project wide for fuels reduction. Second, the District should focus on lands adjacent to the WUI and CPZ with commercial treatments and reduce the basal area in those areas down to 40 sq.ft. per acre. Additionally there has been an abundance of in-growth of shade tolerant tree species under the ponderosa pine. These trees create a fire risk because of the increased fuel loadings, but also the ladder effect of carrying fire into the crowns of the more fire resilient ponderosa.

This below picture of the Bitterroot Front area shows the uninterrupted fuel loadings from deep in the Project's higher elevations to the lower WUI. This area should receive heavy treatments to reduce the fuels and slow the spread of fire.



4. We 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. This is especially true with salvage projects where burnt trees may have low value and the logging needs to be completed using the most cost effective method.

The picture below of the Project area shows slopes that are over 35% slope that might lend themselves to tethered logging. We would like the District to consider this method as you prepare your EA.

The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. Tethered-assist logging is becoming a more economical and available method of yarding on steep slopes throughout the region. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked

equipment are transferred to the tethering uphill. Other Forests in the Region have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. **We urge the Forest to consider allowing this equipment to be used where appropriate on the Bitterroot Front project to mitigate implementation obstacles.**

Green, P. Q., Chung, W., Leshchinsky, B., Belart, F., Sessions, J., Fitzgerald, S. A., Wimer, J. A., Cushing, T., Garland, J. J. (2019). Insight into the productivity, cost and soil impacts of cable-assisted harvester-forwarder thinning in western Oregon. *For. Sci.* 66(1):82–96

Key Points of the Green paper include:

- The use of cable assistance can reduce track coverage and reduce shear displacement, and thus likely lessen potential soil impact caused by forestry machines.



We would like the District 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 end result to be rather than prescribing how to get there. There are a variety of operators that work in the Bitterroot National Forest market area with a variety of skills and equipment. Developing an EA 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 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. Though some of the proposal area may be planned for cable harvest, there may be opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. In addition to using tethered logging as mentioned above, we would like the Forest to allow ground-based equipment to operate on slopes up to 45%. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. There has also been some discussion of possible helicopter logging. AFRC believes we need further discussions on this topic to look at volumes per acres of helicopter units and to inquire about availability. Again, tethered logging may fill that need.

Finally, 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.

5. The scoping document outlines “opportunity areas” that are being identified to improve other resources such as livestock and big game forage production, elk winter range, retention of visual qualities, enhancement of recreational opportunities, and providing for semi-primitive recreation.

The two pictures below show how thinning dense stands in the area can create the “opportunity areas” desired by the District. Both were taken in the Project Area.





6. AFRC supports the Districts plan to use a variety of silvicultural treatments including intermediate harvests (thinnings and improvement cuts) and regeneration harvests where insects and disease are present. This includes shelterwood, seed tree, and clearcuts (less than 40 acres).

The picture below shows the dense stands with little or no openings. This basal area per acre makes the area ripe for insect or disease, and we saw signs of outbreaks on our field trip to the area. Some regeneration is needed to promote forest health in our opinion.





7. Table 2 below shows the number of roads by ownership and type. The District is proposing improvements to the road system, as well as road decommissioning.

**Table 2. Existing roads within the project area.**

<b>Road Jurisdiction</b>	<b>Miles</b>
Existing National Forest System Roads	371.4
Existing Undetermined Roads (currently not NFS Roads)	21.8
Not needed and previously decommissioned	31.4
County Roads	6.3
Private Roads	12.8
<b>Grand Total</b>	<b>443.7</b>

While AFRC agrees that a lot of work is needed to bring the roads up to standards and to address problematic roads in the Project area, we would like to remind the Forest that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products in the matrix lands. 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. Your Management Plan directs the land base covered in the Bitterroot Front Project area is to be managed for a variety of objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us. For roads being decommissioned, we suggest using barriers or blockage of the road entrances. AFRC does not support obliteration or recontouring roads that are to be decommissioned because of the high cost involved.

Furthermore, there are alternative methods to mitigating potential resource damage caused by poorly designed or poorly maintain roads aside from full decommissioning. Removing or replacing ineffective culverts, installing waterbars, and blocking access are all activities that can mitigate resource damage while maintaining useful roads on the landscape for future use. Please consider these methods as an alternative to full decommissioning.

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 Bitterroot Front planning 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 firefighters 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.

8. AFRC supports the District requesting a Forest Plan Amendment related to Elk Habitat Objectives including elk habitat effectiveness, thermal cover, and hiding cover. AFRC believes that new science has shown that forage is more important than thermal cover, and the old Elk Habitat Objectives put a higher value on cover. This Amendment would apply to this project only, and should enhance elk viability.
9. We suggested the use of Designation by Prescription for this project while on our field trip. Also, at a recent purchasers meeting, Forest personnel asked if industry favors the use of DxP and the answer was overwhelmingly positive. This would be an excellent project for DxP use, especially when using thinnings and improvement cuts.
10. AFRC supports the concept of shaded fuel breaks along strategic roads within the project area. These fuel breaks should be wide enough to stop or slow down a fast-moving wildfire. At a minimum, these breaks should be 300 feet wide on either side of those roads. The stands within those fuel breaks should be thinned to a wide spacing and low basal area to reduce the threat of a crown fire going through the area. The purpose of the fuel breaks is to get the fire to lay down on the ground for suppression purposes. With so much of the area within the CPZ and WUI it is important that ingress and egress roads are adequately thinned to allow traffic during a fire and to provide fire breaks.
11. We would like to encourage the Stevensville 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

Key points of the Gray paper include:

- a. Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- b. Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the sequestration of carbon from atmospheric CO<sub>2</sub>, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

Links to the above mentioned studies can be found at:

Lisa McCauley article on large scale forest restoration stabilizes carbon:

<https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/eap.1979>

Andrew Gray article on Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity:

<https://www.fs.usda.gov/treearch/pubs/52237>

Thank you for the opportunity to provide scoping comments on the Bitterroot Front Project. I look forward to following this Project through the Draft EA and then on to implementation.

Sincerely,

A handwritten signature in cursive script that reads "Tom Partin". The signature is written in dark ink and has a fluid, connected style.

Tom Partin  
AFRC Consultant

  
Portland, Oregon 97239