**VIA Link:** https://www.fs.usda.gov/project/bitterroot/?project=64728

September 7, 2023

Bitterroot National Forest
Attn: Emmet Pruss – Soda Baker Project
1801 N 1st Street
Hamilton, MT 59840

Dear Emmet:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Soda Baker Fuels Break 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 Soda Baker Project will create a 2,378-acre fuel break to address hazardous fuel conditions adjacent to roads in the West Fork Bitterroot River and Nez Perce Fork Bitterroot River areas and the nearby communities of Darby and Conner. The Soda Baker Fuels Break Project is being proposed under Section 40806 of the Bipartisan Infrastructure Law of 2021. This law authorizes the construction of linear fuel breaks adjacent to existing constructed linear features, such as a road, trail, powerline, or similar feature. Fuel breaks may be up to 3,000 contiguous acres and a maximum width of 1,000 feet. Projects which fall under Section 40806 are excluded from documentation in an Environmental Assessment (EA) or Environmental Impact Statement (EIS).

The purpose of this Project is to get ahead of potential active wildfires so that the Forest Service can take a more environmentally sound approach than is allowed during the emergency of an actual wildfire. While these fuel breaks are being proposed to help mitigate some of the effects

identified in the wildfire crisis, the sense of urgency in putting these fuel breaks in place is real. The intent is to reduce wildfire spread and intensity and to reduce the risk of uncharacteristic wildfire on Federal land or catastrophic wildfire for nearby communities. Treating these areas now would increase the effectiveness of suppression efforts and help maintain the safety of these communities and area resources should we experience a wildfire event. The Project is within the Wildland Urban Interface (WUI) and one of the most at risk firesheds in the nation (Ranked #18). Implementation of the proposed action would connect untreated areas with areas previously treated, to provide a contiguous fuel break with reduced ladder, crown, and surface fuels.

AFRC and our members have seen firsthand some of the devastation of the many wildfires that have occurred on the Bitterroot. Below are pictures from the Roaring Lion Fire that burned on the Bitterroot. These large fires once started are difficult to stop, but certainly reducing the fuels in front of a potential fire for 1,000 ft. and having the road prism down to mineral soil also could make a big difference.

We also want to emphasize that we believe the thoughtful implementation of fuel breaks to be an integral component of a larger wildfire mitigation strategy. Effective location and implementation of fuel breaks can certainly assist suppression tactics and firefighter safety in the event of a high-severity wildfire. However, placement of a network of fuel breaks alone will not fully address the current crisis at the necessary scale. Density management and fuels reduction treatments must be planned and implemented ***across the entire landscape*** if the Forest Service hopes to reduce undesirable wildfire. In fact, much of the Soda Baker project area overlaps one of the 250 high-risk Firesheds identified by the Forest Service. These Firesheds were identified as being at high risk of damaging wildfire in the absence of hazardous fuels reduction treatments. The Forest Service has prioritized such treatments in their Wildfire Crisis Strategy and has repeatedly identified a need to expedite those treatments through NEPA efficiencies.

Therefore, we urge the Bitterroot National Forest to consider whether implementation of the Soda Baker Fuels Break Project will complicate effective implementation of needed fuels reduction work beyond the 1,000-foot break. Forest stand types in this area likely extend beyond 1,000 feet of the existing roads and it is reasonable to assume that if the first 1,000 feet of any given stand needs fuels reduction treatment, then portions of the stand beyond 1,000 feet would

need similar treatments. It would be unfortunate if the establishment of these fuel breaks hinders additional fuels reduction treatments in the future.

While AFRC strongly supports the Soda Baker Fuels Break Project, we offer the following comments to support and enhance the Project.

1. AFRC strongly supports the Forest using the new Fuels Break CE. The area where the CE is being proposed meets the criteria needed under this CE:: "*Of Fuel Breaks in Forests and Other Wildland Vegetation Establishes a Categorical Exclusion for fuel breaks up to 1,000 feet in width, not more than 3,000 acres of treatments and located primarily in — the wildland-urban interface or a public drinking water source area; if located outside the wildland-urban interface or a public drinking water source area, an area within Condition Class 2 or 3 in Fire Regime Group I, II, or III that contains very high wildfire hazard potential; or an insect or disease area designated by the Secretary concerned as of the date of enactment of this Act. No new road construction is allowed, but temporary road construction is and temporary roads cannot be open for more than 3 years."*

2. AFRC encourages the Forest to thin up to the maximum width of 1000 ft. when creating the shaded fuel break. We also encourage the Forest to remove trees of ALL diameter classes needed to attain desired end results. Codominant trees and intermediate sized trees often grow into the larger overstory trees you want to protect. These ingrowth trees serve as ladder fuel and need to be removed to protect the larger overstory and fire dominant trees. We encourage the Forest to thin down to 40 sq. ft. of basal area. This would further reduce the fuels loading and increase tree vigor for the remaining trees.

Table 2 below shows the various options for treatments including commercial and non-commercial.

**Table 2. Difference between Thinning Treatments**

| Mechanical Fuels Thinning | Non-Commercial Mechanical/Hand Thinning |
|---|---|
| Proposed thinning treatments to reduce fuels **where commercial products may be cut and/or removed** from the unit. | Proposed thinning treatments to reduce fuels by mechanical or hand treatment but are **not intended to produce any commercial products.** |
| A portion of the commercial size trees may be felled and removed (hauled) from the site using mechanical equipment and transport. If not economical or desired to remove commercial value, trees may alternatively be used for firewood gathering and/or burned to reduce fuel loading. Trees/brush/activity fuels of non-commercial value may be cut, felled, masticated, scattered, piled and/or burned to reduce fuel loading. | A portion of the trees/brush would be cut, felled, masticated, scattered, piled and/or burned to reduce fuel loading. |

AFRC encouragaes the Forest to use the mechanical fueld treatment where needed and also for the the generation of raw materials that are sorely needed for our local sawmills. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project, including the Soda

Baker Fuels Break Project. AFRC has pointed out before that the "restoration" treatments that are desired on these lands cannot be implemented without a healthy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed.

AFRC is very pleased that the Forest has chosen to use mechanical fuel treatments on 2,000 acres of this Project that will likely provide useful timber products to our members. See Table 1 below.

**Table 1. Summary of proposed activities**

| Proposed vegetation treatments | Acres |
|---|---|
| Mechanical Fuels Thinning | 2,000 |
| Non-Commercial Mechanical/Hand Thinning | 0 |
| Hand Treatment only (mitigation for resource concerns) | 378 |
| Prescribed Burning[1] | --- |
| **Total Acres Treated to Reduce Vegetative Fuels[2]** | **2,378** |

Montana's forest products industry is one of the largest components of manufacturing in the state and employs roughly 7,000 workers earning about $300 million annually. Without the raw material sold by the Forest Service, DNRC, and private lands 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. There is a possibility that some of the wood from this Project may go to Idaho facilities, and Idaho studies show that 18-20 direct or indirect jobs are created for every million board feet of timber harvest.

Thank you for the opportunity to provide scoping comments on the Soda Baker Fuels Break Project. We look forward to its quick implementation.

Sincerely,

Tom Partin
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