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September 8, 2023

Lisa Timchak
Attn. Georgetown Fuel Break Project
420 Barrett Street
Dillon, MT 59725

Dear Lisa:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Georgetown Fuel 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 Beaverhead-Deerlodge 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 Georgetown Fuel Break Project will create a 2,610-acre fuel break to address hazardous fuel conditions adjacent to 34 miles of road in the Middle Fork of Rock Creek, East Fork reservoir, Georgetown Lake, and Silver Lake areas and the nearby community of Georgetown. The fuel break runs east to west along the front county of the Anaconda Pintler Wilderness and is located three miles south of the Georgetown Lake Community in the Pintler Ranger District. The Georgetown Fuel 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. No new permanent road construction is proposed but short temporary roads may be constructed to access and remove trees. These temporary roads would be open for less than three years.

AFRC and our members have seen firsthand some of the devastation of the many wildfires that have occurred in the Beaverhead-Deerlodge National Forest. Below are of the Trail Creek Fire on the Beaverhead-Deerlodge that has very similar timber types. These large fires are often difficult to stop once they are established, but reducing the fuels in front of a potential fire for 1,000 ft. and having the road prism down to mineral soil could certainly aid suppression activities.

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 Georgetown 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 Beaverhead-Deerlodge National Forest to consider whether implementation of the Georgetown Fuel 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 Georgetown Fuel 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 for the Georgetown Fuel Break Project. 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 supports the objective of these treatments which is to reduce fuel loads by removing some overstory trees and creating space for new trees to be established. Overstory tree retention would be variable but largely only scattered trees would remain in the overstory. Slashing, piling, and/or scattering of non-merchantable trees and brush would occur followed by pile burning and/or broadcast burning to reduce the fuel loading. Created openings would reduce surface and ladder fuels.

   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.

   AFRC encouragaes the Forest to use the mechanical fuels 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 Georgetown 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 pleased to see that the Forest is planning on conducting mechanical fuels treatments to do the work on the 2,610 acres of fuel treatments.

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.

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

Sincerely,

Tom Partin
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