VIA Link: https://www.fs.usda.gov/project/flathead/?project=64699

September 8, 2023

Attn: Gary Blazejewski – Flathead Fuel Break Project
Flathead National Forest
Hungry Horse Ranger District
PO Box 190340
Hungry Horse, MT 59919

Dear Gary:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Flathead 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 Flathead 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 Flathead Fuel Break Project is located primarily in the wildland-urban interface (established by the Flathead County Community Wildfire Protection Plan - 2021). The Fuel Break includes parts of Good Creek, Ashley Lake, and Lion Hill road areas to benefit nearby homes and communities as required by the Fuel Break Categorical Exclusion. 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 3 years. The Flathead Fuel Break Project was developed in response to this cross-boundary agreement that came out of several community meetings in 2022. Three fuel breaks totaling 1,784 acres were selected to be included in this Project that were identified as priority fuel reduction locations to strategically manage future large fires. Two fuel breaks (Good Creek and Ashley Lake) are located in the

Tally Lake Ranger District, while the Lion Hill fuel break is located in the Hungry Horse Ranger District.

The Flathead 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.

AFRC and our members have seen firsthand some of the devastation of the many wildfires that have occurred in the Flathead National Forest. Below is a picture of a fire near the border of the Flathead. 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 Flathead 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 Flathead National Forest to consider whether implementation of the Flathead 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 Flathead 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 Flathead 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.

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 encouragas 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 Flathead Fuel 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 has designated 1,784 acres as mechanical fuel treatments as per table 1 below:

Table 1. Summary of proposed activities

Proposed vegetation treatments	Acres
Mechanical Fuels Thinning	1,214
Non-Commercial Mechanical/Hand Thinning	570
Total Acres Treated to Reduce Vegetative Fuels	**1,784**

*Prescribed burning may be applied as a secondary treatment to any unit in the project area. The total acreage would not be expanded.

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 Flathead Fuel Break Project. We look forward to its quick implementation.

Sincerely,

Tom Partin
AFRC Consultant
921 SW Cheltenham Street
Portland, Oregon 97239