



March 13, 2024

Jennifer Runnels
Libby Ranger District
12557 Hwy 37
Libby, MT 59923

In Reply To: Snowshoe Granite 1000 Fuel Break Scoping

Dear Ms. Runnels:

American Forest Resource Council (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. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Libby Ranger District, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. 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. The majority of the industry is centered in western Montana where the project is located.

AFRC is pleased to see the Libby Ranger District proposing vegetation management that will likely provide useful timber products to our membership by utilizing the authorities under Section 40806 of the Infrastructure Investment and Jobs Act to streamline the analysis of the project. Effective implementation of the Wildfire Crisis Strategy will not occur if the Forest Service continues to rely on cumbersome Environmental Assessments that consume hundreds of pages and multiple years of staff time and energy. We are also pleased to see the District include the harvest and removal of timber products to achieve hazardous fuels reduction objectives. Commercial harvest is a critical tool to mitigating fire risk and improving fire resiliency through

the reduction of ladder fuels. We urge the District to develop prescriptions that reduce ladder fuels through mechanical thinning that will discourage high intensity wildfire and allow firefighters safe locations to suppress fires in the understory.

One concern we have with the fuel break approach is how its implementation will impact future land management activities. Due to the nature and structure of the fuel break concept (fixed widths from the road) there is the likelihood that some forest stands will effectively be cut off. For example, a forest stand with undesirable fuel levels may extend several thousand feet off a road. Through this project, only the first thousand feet will be treated leaving portions of the stand beyond those thousand feet cut off. The economical and logistical treatment of those additional untreated acres in the future becomes questionable following this treatment. Ideally, the Forest Service would pursue treatment of the entire stand in need. However, the tool being used here does not permit this to occur. We would like the District to consider the effects on future treatment needs if the project is implemented as currently designed. While we are supportive of the placement of fuel breaks to protect at-risk communities and adjacent landowners, we are concerned that their placement may compromise the ability to conduct treatments across the entire forest in need.

The timber products provided by the Forest Service are crucial to the health of our membership. 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 manner in which these products are permitted to be delivered from the forest to the mills. 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 (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service 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 Barlow market area with a variety of skills and equipment. Developing a 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 CE and 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 is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. 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.

The scoping document implies that the terrain proposed for treatment can be accessed with ground-based equipment. If portions of the terrain are not accommodating to ground-based equipment, we urge you to consider the use of tethered-assist equipment, which is becoming a more economical, safe, 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 have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. We urge the Libby District to consider allowing this equipment to be used where appropriate on this 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 Point 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.

Garland, J., F. Belart, R. Crawford, W. Chung, T. Cushing, S. Fitzgerald, P. Green, *et al.* 2019. Safety in steep slope logging operations. *J. Agromedicine* 24(2):138–145.

Key Point of the Garland paper include:

- Use of new tethered-assist technology reduces exposure to hazards and reduces workers exposed to the most dangerous work in logging—felling and working on cable operations on steep slopes.

AFRC is happy to be involved in the planning and decision-making process for the Snowshoe Granite Fuel Break CE. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or ageissler@amforest.org.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andy Geissler".

Andy Geissler
Federal Timber Program Director
American Forest Resource Council