



VIA Link: <https://www.fs.usda.gov/projectlhcnf/?project=65687>

July 16, 2024

Kathy Bushnell
Helena District Ranger
2880 Skyway Dr.
Helena, Montana 59602

Dear Kathy:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Larabee Hat Vegetation 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 Helena-Lewis and Clark 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. 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 Larabee Hat project area is located in Powell County on the Helena Ranger District. It includes National Forest System lands between the Little Blackfoot River and the western boundary of the Helena Ranger District, south of Highway 12 near Elliston, Montana. The Project area encompasses 43,158 acres with 89% of the Project area comprised of lands administered by the U.S. Forest Service.

AFRC submitted scoping comments on March 26, 2024, and in our comments we stated that we were pleased to see the District is proposing vegetation management that will likely provide useful timber products to our membership. We are also pleased to see that the provision of timber products is included in the Project's purpose and 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.

AFRC supports the management plan for the Project which includes commercial timber harvest (intermediate or regeneration) proposed on 3,126 acres in the Project, 823 acres of non-commercial thinning, along with 13,860 acres of prescribed fire or fuels treatments.

Table 1 Summary of Primary and Secondary Treatment Types

Primary Treatment Type	Primary Treatment Approximate Acres	Secondary Treatment Approximate Acres (Broadcast Burn)
Timber Action		
Intermediate Harvest (including aspen restoration)	1,933	1,933
Regeneration Harvest	1,193	1,193
Precommercial (including aspen restoration)	823	119
Prescribed Burning		
Fuels Treatments	487	487
Prescribed Burning	13,373	0
Total	17,809	3,732

While the Preliminary Assessment (PA) adequately outlines the Proposed Action, we feel the District did not adequately describe the No Action Alternative. The document states: *“In general, most natural processes and disturbances would continue in the short term. Natural processes and disturbances would occur, causing changes over the long term; see the resource reports for descriptions of these effects.”* We strongly believe you have underestimated the probable impacts that fire and insects and disease could have on the area in the near term. Information in the PA states that the most recent large fire in the project area occurred in the 1860s. Fire has been largely absent within most of the project area, which has resulted in decades of surface fuel buildup. Further, the document states that: *“Wildfire can also threaten human safety, health, livelihoods, homes, and property. In some cases, wildfire may also pose an unacceptable threat to specific ecosystem components.”*

We urge the Forest to consider expanding the likely effects of taking no action. Supplementing the No-Action Alternative with likely repercussions should strengthen the need for taking action described in the proposed alternative.

AFRC is disappointed that the District did not consider commercial treatments in the Electric Peak Inventoried Roadless Area (IRA). As we noted in our scoping comments, the Forest likely knows active management, including commercial timber harvest, is permitted in IRAs. Section

294.13 of the Roadless Rule permits the cutting and removal of “generally small diameter timber” if needed to “maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects.” We believe that such removal is likely needed in the Electric Peak IRA to address wildfire risk. Also, this particular IRA, despite its designation, has existing roads within its boundary that could facilitate mechanical treatments without the need to create additional roads. Focusing treatments near these existing roads would also support potential fire suppression activities. Further, a portion of the Roadless Area is not included in the Recommended Wilderness Area that was proposed in the 2021 Forest Plan Revision.

The District is planning an ambitious suite of non-commercial activities. AFRC is very concerned about how those activities will be funded. The tables below illustrate our concerns. The estimated value of the 17 mmbf of timber to be sold is roughly \$600,000. The burning cost alone is estimated at over \$10 million.

Measure	Larabee Hat Vegetation Project
Sawtimber Volume Harvested (Hundred cubic feet)	30,506
Non-sawtimber Volume Harvested (hundred cubic feet)	4,576
Base Rates (dollars per hundred cubic feet)	\$3.00
Appraised Stumpage Rate (dollars per hundred cubic feet)	\$43.48
Predicted High Bid (dollars per hundred cubic feet)	\$73.39

In addition, several restoration (non-timber harvest) activities are included in the proposed action that would result in costs. Anticipated revenue from the sale of timber could be applied to these Forest Service expenditures. These projects and cost estimates are displayed in Table 9.

Table 9. Restoration Activities (Non-Timber Harvest Activities) in 2024 dollars

Description	Work to be Performed by	Cost
Road Decommissioning/Obliteration - 10.0 miles	Contractor	\$60,000
Specified Road Reconstruction - 3.0 miles	Contractor	\$43,000
Aspen Regeneration - 125 acres	Contractor	\$80,750
Mechanical Fuels Treatment - 150 acres	Contractor	\$242,250
Pre-Commercial Thinning	Contractor	\$214,000
Burning (Primary) - Contracted	Contractor	\$2,530,500
Burning (Primary) - Forest Service	Forest Service	\$7,591,500
Prescribed Fire Following Timber Harvest	Forest Service	\$3,251,000
Noxious Weed Treatments	Forest Service	\$38,000
Beaver Dam Analog Stream Restoration	Forest Service	\$25,000
Watershed Improvements - Planting and Fencing	Forest Service	\$25,000
Dispersed Campsite Restoration	Contractor	\$15,000

Additionally, AFRC is concerned about the amount of prescribed burning for the Project. AFRC believes there should be contingency plans developed to capture timber salvage opportunities should any of the prescribed fires escape containment lines. This would allow for rapid timber salvage without going through another lengthy comment period.

AFRC would like to reiterate our position on logging economics with a reminder that the desired outcomes outlined in the scoping document 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 Beaverhead-Deerlodge 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 EA 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 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, 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 in the Region have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. We urge the Helena District to consider allowing this equipment to be used where appropriate on the Larabee Hat 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 concerned with the Road Management Plan. The Plan states that approximately 17.5 miles of temporary roads would be reconstructed or constructed for use as haul routes and **decommissioned** after treatments are completed.

While we understand the need to manage your road system and protect resources at risk, we ask that you consider that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This is especially true when considering the decommissioning of roads. 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 proposes to decommission, abandon, or obliterate road segments from the Larabee Hat Project 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 fire fighters quicker and safer access to suppress any fires that are ignited.

We would like the Forest 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.

Finally, we are including links to three studies by Brian Sugden relating to road maintenance and sedimentation, BMPs in Montana, and streamside management and impacts to water temperature. We think these studies can help inform the analysis related to aquatic resources.

<https://www.tandfonline.com/doi/abs/10.1080/14942119.2019.1571472?scroll=top&needAccess=true&journalCode=tife20>

<https://academic.oup.com/jof/article/110/6/328/4599544>

<https://www.tandfonline.com/doi/full/10.1080/14942119.2019.1571472?scroll=top&needAccess=true&>

In our scoping comments we encouraged the Forest to conduct a detailed analysis on the Project's impacts to climate change, carbon sequestration, and greenhouse gas emissions. Interim CEQ regulations pertaining to the analysis of this resource have recently been updated and the Forest Service must conduct its analysis on this Project accordingly.

We are pleased to read the Conclusion in your carbon analysis section that states: *"The No-Action Alternative would not result in direct short-term effects on carbon in the Helena-Lewis and Clark National Forest but may contribute to carbon loss over time due to increased risk of severe wildfires and insects including in areas without the proposed harvest and prescribed fire activities for the Larabee Hat Project. The proposed action alternative would result in a short-term decrease in carbon stock of the forest due to tree removal and project disturbances, in addition to fossil fuel emissions from project equipment and vehicles, but these would be offset by the increase in fire-resilient ecosystems and decreased risk of severe wildfire and insect outbreaks. Because the proposed action would contribute to carbon uptake and storage over the long term, this would contribute to an increase in the carbon stock of the Helena-Lewis and Clark National Forest and would improve the capacity of the treated stands to sequester carbon in the long term."*

Overall, we are pleased with the majority of the Carbon Report as it acknowledges the role that carbon storage in long-lasting wood products plays, as well as the fact that aging forests begin to transition to carbon sources rather than sinks. In particular, it is refreshing to see the Forest highlight the fact that aging forests start to become less effective at carbon sequestration than younger forests. We urge you to highlight this in the context of the stands planned for regeneration harvest.

Our scoping comments included several references related to carbon. We are pleased to see some of them incorporated into the Report. We will not duplicate those references again here, but urge the Forest to revisit our scoping comments to consider incorporating additional components of our carbon discussion into your final analysis documents.

Thank you for the opportunity to provide comments on the Larabee Hat PA. I look forward to following the Project through implementation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Tom Partin
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