



VIA Link: <https://www.fs.usda.gov/project/kootenai/?project=65292>

September 11, 2024

Seth Carbonari, District Ranger
Eureka Ranger Station
949 US Highway 93 N
Eureka, MT 59917

Dear Seth:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide Draft Environmental Assessment (EA) comments on the East Fork Fire Salvage and Restoration Project (East Fork Salvage).

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 Kootenai 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 East Fork Fire started on July 30, 2023, by a lightning strike, and burned with varying severity, leaving a mosaic of burn patterns across the landscape that range from unburned islands to areas where tree crowns were completely consumed. The 13,259-acre project area is located 12 miles south of Trego, Montana and the action proposal is to salvage dead and dying trees, remove hazardous fuels, and plant seedlings in portions of the East Fork Fire area.

AFRC and our members have been very engaged in supporting the District to pursue salvage and restoration efforts. AFRC submitted scoping comments on February 8, 2024, and visited the burned area on June 13, 2024 with Forest Service representatives including District Ranger Seth Carbonari, Regional Sale Prep Forester David Haupt, and Operations Staff Officer for the Kootenai National Forest Seth Cole and other Forest Service personnel. During that trip we

observed the total devastation from the fire in some areas and lower intensity burns in others. We also saw a mix of species including white woods, Douglas-fir, and western larch. The species mix is a very important consideration because much of the white wood including grand fir, spruce, and lodgepole will be heavily defected after standing the entire summer. We witnessed a lot of deterioration that was already occurring in June. The pictures below of the East Fork fire give a good indication of the varying degree of mortality.



AFRC agrees with and supports the Purpose and Need for the Project. The Region has used a similar Purpose and Need for most of the salvage work in recent years and AFRC believes it is the correct approach:

- Recover economic value of forest products in a timely manner to contribute to employment and income in local communities and avoid loss of commodity value.
- Re-establish forested conditions and/or facilitate recovery to meet management objectives outlined in the Forest Plan.
- Reduce hazards threatening human health and safety.

While we support the Project, we offer the following comments we hope will be useful as you finalize the EA.

1. AFRC is disappointed that commercial salvage will now only be conducted on 1,707 acres while in the scoping document the plan was to salvage 3,987 acres. That being said we understand why the number of acres were scaled back, and that was due in part to the deterioration of the white wood species, and removal of some of the steeper ground that couldn't be reached by tractor logging methods. We further support the need to create openings larger than 40-acres due to the fact that all the trees in some areas are already dead. We appreciate the District providing 60 days public notice of this proposal.

As we pointed out in our scoping letter, AFRC supports maximizing treatment acres in any planning document to meet desired end results, and should there be marginal acres for salvage, AFRC would like to see those included as optional. The District has also outlined 454 acres for fuels treatment without commercial activity. Should merchantable material be found in these areas, or any others not currently designated, we would request they be included as "subject to agreement" in commercial harvest units. Since the EA covering this Project area will most likely be active for several years while rehabilitation is taking place and its unlikely another project will be planned in this area for several decades, it is best to address all forest health needs during this entry.

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. The timber products provided by the Forest Service are crucial to the health of our membership and the counties and communities where they are present. 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.

2. AFRC supports the proposal for the reforestation of 3,550 acres either by natural regeneration or planting. We also support the Road Management Plan which calls for 3.7

miles of temporary road construction and maintenance or reconstruction on 42.4 miles of haul road. In general, road conditions in the project area appeared to be well maintained based on our site visits. Although we support adequate maintenance of the Forest Service road system, we caution the Forest Service from proposing excessive road upgrades in conjunction with this project as the value of the damaged timber products may not fully subsidize the proposed maintenance and construction. Please consider paring down the road upgrades to ensure safe and effective travel that can be supported by the timber sale value.

3. AFRC supports the District's proposal to harvest in some areas that were previously identified as old growth. There were 1,542 acres of stands identified as old growth prior to the fire, however, based on field assessments following the fire, 1,444 of those acres no longer meet the definition of old growth. They do not contain enough live trees per acre that are both old enough and large enough and/or they do not contain enough live trees per acre to meet the stocking criteria. Of the acres that previously met the definition of old growth, approximately 899 acres are proposed for salvage and 134 acres are proposed for fuel treatment.
4. AFRC was pleased to see that the Forest deferred treatment in areas only accessible with expensive logging methods such as cable or helicopters. The effectiveness of harvesting and yarding fire damaged timber with low volume per acre on steep slopes is a significant obstacle to implementation. The criteria listed that AFRC Supports includes: *"Ground-based equipment will only operate on slopes less than 40 percent). Where slopes within an activity area contain short pitches greater than 40 percent, but less than 150 feet in length, ground-based equipment may be allowed."*

We would again like to remind the District that 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 Kootenai National Forest market area with a variety of skills and equipment. Developing an EA and 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.

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 steeper 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 Eureka Ranger District to consider allowing this equipment to be used where appropriate on the East Fork Salvage project to mitigate implementation obstacles.

Finally, AFRC would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has limited operating time at best, and further reductions such as these only makes surviving in the logging business that much more difficult.

5. We recommend the District consider the need for hazard tree removal along the 42.4 miles of haul route associated with this project. We are aware of several decks created from fire line construction but suspect there are additional needs to address standing hazard trees outside of proposed salvage units. The District could remove safety hazards and increase timber volume by conducting these roadside operations.
6. AFRC would like to remind the District that oftentimes signs of mortality in trees are not always evident. Some trees may only have their roots burned while their crowns remain green when fires stay on the ground and don't crown out. Having roots scorched or burnt will ultimately result in tree mortality. We encourage the District to consider signs of mortality other than crown scorch, including bole and root damage, and include those trees in the salvage operation. We also ask the District to be flexible when setting and implementing utilization standards for sawlogs. A larger minimum dbh at breast height and top log size will be needed to account for the rapid deterioration of the standing timber. Purchasers will recover as much merchantable material as possible; however, requiring the removal of additional non-merchantable material could pose a risk to potential bidders that may reduce interest in the sale. If markets exist for such material, it can be removed subject to agreement. If markets do not exist, that material can be addressed following completion of the sale to reduce fuel loadings.
7. AFRC strongly supports the District requesting an Emergency Situation Determination (ESD) from the Chief of the Forest Service. If an ESD is granted, this Project would not be subject to the pre-decisional objection process. Once analysis is completed and a decision signed by the Responsible Official, implementation could begin immediately. The ESD is needed to quickly capture damaged timber value prior to deterioration, remove the trees for public safety, and to effectively reforest the affected acres. Prompt removal of fire-damaged trees is also safer for tree fallers. As fire-damaged trees remain on the landscape they

become more brittle and structurally unsound, making their felling more dangerous as time elapses. AFRC always encourages and supports getting salvaged wood to the marketplace quickly-since it has already now stood through most of the summer. Many tree species, especially white woods, deteriorate quickly once warmer weather hits and insects become more active.

8. AFRC is concerned by the omission of any analysis on effects to greenhouse gas emissions and carbon sequestration. 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. Specifically, those regulations require that greenhouse gas emissions be analyzed for all federal actions. Those regulations also encourage federal agencies to consider the context of short-term emissions as a result of actions that will improve long term sequestration and storage. We strongly believe that the minor, short-term emissions associated with timber harvest and other associated treatments are dwarfed by the long-term benefits associated with salvage treatments.
9. AFRC believes the District has done a good job of analyzing any and all impacts to the Grizzly bear and Canada lynx from planned operations. In fact, of the 90 pages in the Draft EA, 19 pages were dedicated to the discussion of potential impacts to the Grizzly bear and how they might be avoided or mitigated. While the modified proposed action may affect, is likely to adversely affect grizzly bears, AFRC supports the District's findings that: *"While activities may disturb a grizzly bear or cause it to temporarily avoid the activity areas until human actions are completed. However, the effects of proposed activities would be limited in scope and would not markedly change the ability of the area to support bears. Also, implementing this proposal would not create a significant departure from past human use patterns or create an obvious source of conflict between people and bears resulting in an increased potential in bear mortalities. Cumulatively, mortality risk would not change appreciably due to implementing the proposed action."*

The Draft EA also had 9 pages of analysis dedicated to the impacts to the Canada lynx from the operations. The statement of finding found that: *"The modified proposed action may affect, is likely to adversely affect Canada lynx due to the existing adverse baseline. Other than the existing conditions in the Sunday-Trego lynx analysis unit, no other activities would adversely impact lynx."* The Sunday-Trego lynx analysis area has green reproduction, but it is not of a size yet to sustain lynx prey, the snowshoe hare. No salvage operations would be conducted in these younger green stands; thus, the operations will not impact the Canada lynx.

Thank you for the opportunity to provide Draft EA comments for the East Fork Sunday Fire Salvage and Restoration Project. We look forward to it being quickly implemented, hopefully by early fall.

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
AFRC Consultant
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Portland, Oregon 97239