**VIA Link:** [Beaverhead-Deerlodge National Forest - Home]

September 24, 2025

Butte Ranger District
Attn: Timothy Lahey
1820 Meadowlark Lane
Butte, MT 59701

Dear Tim:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide Draft EA comments on the Whitetail-State Creek Project.

AFRC is a regional trade association whose purpose is to advocate for sustained timber yield 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 Whitetail-State Creek project area is located about 15 miles north of Whitehall, Montana and 5 miles southwest of Boulder, Montana in Jefferson County. The project area is 39,217 acres in size and consists of five distinct treatment areas, referred to as Whitetail, State Creek, Hay Canyon, Galena Gulch, and the remaining units are designated for non-commercial treatment.

Forest conditions within the project area have significantly deteriorated from desired ecological states due to insect and disease activity and conifer encroachment into historically open forest and aspen communities. This project is designed to address these declining conditions by enhancing forest pest resistance and overall ecosystem resilience, restoring the health and vitality of both aspen communities and developing conifer stands, and creating opportunities for sustainable forest product extraction.. The area has seen multiple large fires over the past several

years including the Haystack and State Creek Fires. Insects and disease from the burned areas are continuing to infect nearby green forests, amplifying the need for treatment.

AFRC supports approval to use the Emergency Action Determination for the Whitetail-State Creek Project on the Beaverhead-Deerlodge National Forest. This project will not be subject to the pre-decisional objection
review process and will help expedite treatments to:

- Reduce the density of fire-dependent forests.
- Support the durability and resilience of forests and grasslands; and
- Use commercial and non-commercial sanitation harvest of trees to control insects or disease, including trees already infested with insects or disease.

While AFRC supports the Proposed Actions, we offer the following comments that we believe will enhance and strengthen the document.

We believe the District is passing up potential areas for treatments. The Project area encompasses 39,217 acres, yet only 1,342 acres are being treated—only 3.5% of the project area. The District acknowledges under Economics Effects that *"The proposed action will provide viable timber to the forest products sector, helping sustain social, economic, and ecological benefit to forestry in Montana. Economic benefits of forest products include revenue that sustains income and jobs. Transportation improvements to FS system routes would also benefit, as without treatment the continued deterioration of the transportation system due to continued use and lack of maintenance."*

The photos below from the Whitetail-State Creek Project area illustrate the need to treat more acres.

The pictures below from the wildfires in the Whitetail-State Creek area show the devastation from non-management-burnt timber and mudslides.

AFRC strongly suggests that the District explore opportunities to treat more acres commercially to meet the Purpose and Need to a higher degree. We previously highlighted the importance of maximizing treatment acres during the NEPA process in our communications with the Forest Service. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present-day needs but also important for future needs. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments affect the long-term sustainability of the timber resources on Forest Service managed land.

We support the use of regeneration harvest using seed tree and shelterwood methods in the Project. Regeneration harvest is a crucial component to a sustainable timber management paradigm. Thinning opportunities will eventually be exhausted and without a regeneration component, so will the Forest Service's timber supply.

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.

AFRC appreciates and agrees with the discussions regarding management in Riparian Conservation Areas (RCA's). The language in the Draft EA states: *"The proposed action is expected to maintain or improve aquatic conditions across the project area. Sediment delivery will decrease with the implementation of road BMP's, riparian health is likely to improve in treated areas, and the project design avoids or mitigates risks to stream function and aquatic habitat."*

AFRC strongly believes that managing in the riparian areas can help to achieve the goals of this Project. It has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in-stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. The Forest Plan describes the need for treatments that meet the need of multiple habitat types, and we encourage the District to look for ways to incorporate treatments that meet those needs. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that the BMP's mandates should be considered.

AFRC appreciates the District's approach in describing the types of equipment to be considered for logging: "*Treatment methods may involve harvesters of various types to cut standing live and dead trees as well as to cut dead and down trees. Trees could also be cut with chainsaws. It could involve various machinery to remove the wood from the treatment areas, and those machines could be used to pile material that is left in the treatment areas. Examples of machines to be utilized to remove material are harvesters and single-grip processors. Harvesters cut whole trees and single-grip processors cut and process trees in the treatment areas."*

While the District recognizes that various methods will be needed for product removal, AFRC would like to remind the Forest that there are many ways to design a timber sale that enables a purchaser 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.

We would like the Forest 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 National Forest market area with a variety of skills and equipment. Developing an EA 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 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 may be planned for cable harvest, there may be opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. We would like the Forest to allow ground-based equipment to operate on slopes for up to 45%. 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.

Tethered-assist equipment is also becoming a more viable, safe, and available option for felling and yarding on steep slopes. This equipment has shown to contribute negligible ground disturbance when compared to traditional cable systems. 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 percent. It would be helpful if you would prepare your NEPA analysis documents in a manner that will facilitate this type of equipment. The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. We appreciate the inclusion of tethered-assist equipment in the EA.

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 a limited operating time at best, and further reductions such as these only make surviving in the logging business much more difficult.

AFRC believes that the use of Designation by Prescription might be a good tool for designating the trees to be harvested and those to be retained especially in commercial thinning, seed tree, improvement cuts, and shelterwood harvests. Prescriptions can be written to accomplish the goal of the thinning the Douglas-fir and leaving the most healthy and vigorous trees found in the units.

For the most part, AFRC supports the proposed Road Actions listed in Table 2 below.

**Table 2. Table of transportation actions in the Whitetail-State Creek Project.**

| Proposed Road Actions | Miles |
|---|---|
| Maintenance (includes reconstruction) | 27 |
| Temporary Roads | 2.5 |
| Decommission | 5.4 |

*Mileages are approximate.

While we support the overall road work needed 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 proposed 5.4 miles of road decommissioning. 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 Whitetail-State 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 that we believe 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&

We would also like the District to review and consider a new study published by Johnston et al. that focuses on the benefits of mechanical thinning in regards to wildfire mitigation.

Johnston, James D., Olszewski, Julia H., Miller, Becky A., Schmidt, Micah R., Vernon, Michael J., Ellsworth, Lisa M. Mechanical thinning without prescribed fire moderates wildfire behavior in an Eastern Oregon, USA ponderosa pine forest. *Forestry and Ecology*. 501 (2021) 119674.

Key points of the Johnston paper include:

- Mechanical thinning can moderate fire behavior in the absence of prescribed fire.
- Modeled crown fire potential declined immediately following thinning, undoubtedly due to significant reductions of ladder fuels that carry fire into the crown and crown density that facilitates spread between crowns.
- Increase in surface fuel and modeled fire behavior was offset by a steady decline in litter and a dramatic decline in duff over time
- Fuel loading in a dry ponderosa pine forest increased for a year or two after thinning and then declined.
- Woody fuel particles increased somewhat following thinning, but litter and duff fuel loading declined dramatically as a result of thinning.

The District provides a section addressing Carbon and Climate. *The analysis show: "The proposed project activities align with climate change adaptation strategies and aim to maintain the carbon-neutral status of the Beaverhead-Deerlodge National Forest. While some short-term carbon losses may result from activities like commercial thinning and pile burning, much of the carbon will remain stored in wood products rather than being released through decomposition. Over the long term, the proposed action is expected to enhance forest health and resilience, reducing the risk of carbon loss from wildfire, insects, and disease. Overall carbon impacts are projected to remain stable or decrease."*

AFRC would like the Forest to be aware of a new study recently published in *the Frontiers of Forests and Global Changes*.

**Rising from the ashes: treatments stabilize carbon storage in California's frequent-fire forests.** Ethan Yackulic, Micah Elias, Joe Shannon , Sophie Gilbert, Michael Koontz , Spencer Plumb , Matthew Sloggy and Katharyn Duffy.

Key Points of the study include:

- As climate change intensifies wildfires and drives crisis policy responses worldwide, it is critical to move beyond the false dichotomy pitting conservation against risk

reduction. Ecological benefits provided by resilient landscapes, like durable live carbon storage, complex forest structures, and configurations essential for biodiversity, are not inherently at odds with treatments to reduce risk. Indeed, proactive treatments, strategically placed, are likely to make carbon storage and key structure-dependent habitats for sensitive species more durable in the face of wildfire and drought.

- Landscape-scale planning efforts that include broad groups of stakeholders, multiple ecosystem values and services, realistic fire risk, and treatment options can help quantify trade-offs and identify optimal treatment scenarios for restoring resilient landscapes.

Thank you for the opportunity to provide Draft EA Comments on the Whitetail-State Creek Project. We look forward to its expedited implementation.

Sincerely,

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