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Organization: Thompson River Lumber

Title:

Comments: Dear Emily: This letter is on behalf of Thompson River Lumber in Thompson Falls, MT. We would like to thank you for the opportunity to provide scoping comments for the Helena-Lewis and Clark National Forest Forest-wide Prescribed Fire Project. Thompson River Lumber is the only mill remaining in Sanders and Mineral County, contributing significantly to the economy in these areas. We view these projects as an opportunity to support the overall timber industry in Montana and to assist the Helena-Lewis and Clark National Forest in achieving their goals on NFS lands. We are writing to provide comprehensive comments and concerns regarding the proposed Forest-Wide Prescribed Fire Project on the Helena-Lewis and Clark National Forest. As a concerned stakeholder, we appreciate the effort to address forest health and wildfire risks, but believe certain aspects require reevaluation to enhance economic benefits, improve efficiency, and align with established directives.

1. Capitalizing on Commercial Opportunities: It is crucial to reconsider the approach of cutting and burning merchantable-sized trees up to 12 inches DBH. Instead, we propose exploring opportunities to turn these trees into forest products. This approach not only sequesters carbon but also contributes to local economies, fostering sustainability.
2. Treatment Acreage and Cost Efficiency: The proposed goal of treating 20,000 acres per year for a total of 2,305,040 acres raises concerns about efficiency and financial implications. At the projected rate, it would take 15 years to complete the treatment. The costs of the treatments over that acreage are likely over a billion dollars using even a low cost of \$500.00 per acre. We believe it is essential to combine commercial timber sales with the fuel treatments to help offset the cost and use the timber sale as a way to construct fire line and fuel breaks and otherwise treat fuels to achieve the desired outcome.
3. Mechanical Treatment Options: Mechanical treatment methods, such as commercial removal of saw logs, post and rail and firewood, should coincide with thinning, mastication, piling, and chipping. These approaches not only contribute to fuel reduction goals but also offer economic opportunities to reduce cost per acre and increase pace and scale of treatment. It should be noted that creation of fuel breaks and rearrangement of fuels can easily be incorporated into mechanical treatments while generating commercial volume. We believe that prescribed fire is a management tool that can be used to address forest health and wild fire risk. We believe that fire should only be used where mechanical treatments have occurred. Even in the treated areas the desired outcome of reducing fuels can be difficult to achieve. Areas that have not been mechanically treated run a much higher risk of a stand replacing fire that may not stay within the prescribed boundaries. There are far too many examples of prescribed fire burning beyond prescription boundaries where no mechanical treatment has occurred.
4. Alignment with Confronting the Wildfire Crisis: The project should align with the direction set by "Confronting the Wildfire Crisis," emphasizing the expansion of markets and forest materials processing infrastructure. This alignment ensures a proactive and strategic approach to addressing wildfire risks.
5. Direction from Montana Forest Action Plan: The project should align with the Montana Forest Action Plan, considering the potential for commercial components. Ignoring this aspect neglects an opportunity to enhance forest health while supporting economic growth. Actively support projects and programs that contribute to the retention of Montana's forest products industry in order to manage the expected increase in pace and scale of crossboundary restoration projects.
6. Reaching Mid-Point in Natural Range of Variability: We are concerned that not treating all age and size classes may exacerbate mortality from prescribed fire and increase damage by attracting insects to fire-injured trees. Capping treatment at 12-inch trees may leave fuel densities such that the residual stands experience mortality and injury beyond desired outcomes. We see this as creating un-needed difficulties in attaining natural range of variability.

We appreciate your attention to our comments. We look forward to further discussions that prioritize the comprehensive well-being of the Helena-Lewis and Clark National Forest.