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First name: Tom
Last name: Partin
Organization: American Forest Resource Council
Title: Consultant
Comments: Attached are the American Forest Resource Council's comments

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April 10, 2024

Dear Sam:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide Draft EA comments on the Trojan Defense 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 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 Trojan Defense Project area is located west and southwest of Troy, Montana. The area of analysis is mixed ownership of, and intermingled within, rural areas of Forest Service, private timber lands, and residential homes and businesses outside of the Troy city limits. The project area includes 2,201 acres of National Forest System land in the 3,697-acre project area. The project area is also located within the Lincoln County Wildland Urban Interface (WUI), which was designated to treat hazardous fuels surrounding the community of Troy, and within the Kootenai Complex Landscape, which was identified through the Wildfire Crisis Strategy as a landscape in need of wildfire mitigation treatments. Therefore, this project will be designed as part of ongoing cross-boundary efforts to connect past, present, and future activities to reduce and mitigate wildfire threats to the Troy community. The Forest is now proposing the following activities: non-harvest fuels treatments on 808 acres; harvest fuels treatments on 916 acres; 0.3 mile of temporary road; six miles of permanent road; 15 miles of road reconstruction and maintenance; approximately one mile of road decommissioning.

AFRC provided scoping comments on October 13, 2023. We also submitted written comments during your public outreach which started in July 2023. We submitted several suggestions on how we believed the Project could be improved, many of which were incorporated into the project design and analysis. Most of the changes made from scoping to the Draft EA are minor, and we still strongly support the Project.

Current forest conditions indicate a need for expedited treatment to mitigate the risk of catastrophic wildfire in this area. Those conditions include: 1) Lack of recent fire resulting in a species composition shift and increased stand densities which has led to stressed trees and unhealthy stand conditions, also causing increased surface, ladder, and crown fuels. Insects and diseases like Douglas-fir beetle, fir engraver, and root disease are capitalizing on the stressed stands and are causing widespread mortality, and 2) The town of Troy and surrounding communities

are situated at the northwest end of the Callahan Creek drainage. In the event of a wildfire, present hazardous fuel conditions and lack of access to areas like McConnell Mountain would make fire suppression tactics difficult and dangerous.

AFRC supports the Purpose and Need for the Project which includes:

* Reduce Hazardous Fuels in the Project Area.

* Manage stands to increase forest health and resilience.

While AFRC supports the Purpose and Need for the Trojan Defense Project we would like the District to consider these additional comments which we think will both support and improve the Project going forward.

1. In addition to the fuels reduction work that will be accomplished, AFRC wants to highlight the importance of supporting the health of the forest products industry to ensure its ability to help implement these projects. Harvesting these acres is critical for providing the raw materials that the sawmills in Montana need to operate.

The summary of proposed actions chart below shows acres to be treated commercially.

AFRC is pleased with the level of harvest fuels treatment in the project area despite the minor level of treatment reduction. These treatment acres, and the timber products they will generate, 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. Specifically, studies in Montana have shown that 12-15 direct and indirect jobs are created for every one million board feet of timber harvested. 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 way these products are permitted to be delivered from the forest to the mills.

Additionally, Montana's forest products industry is one of the largest components of manufacturing in the state and employs approximately 7,000 workers earning about $300 million annually. Much of the industry is centered in western Montana, and this Project is crucial to the infrastructure located in and around the Kootenai National Forest.

Further, AFRC 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 importance is how those treatments affect the long-term sustainability of the timber resources on Forest Service managed land. Not managing the maximum number of acres today will impact the ability to produce the timber needed in the future.

2. AFRC strongly supports the District's plan to apply for an emergency action determination through section 40807 of the Bipartisan Infrastructure Law. For an environmental assessment (EA), this emergency action requires only a proposed action and no action alternative. The proposed action will be designed to treat and reduce fuels within the project area by shifting species composition, size class, and stand densities towards Forest Plan desired conditions. AFRC believes the faster this Project can be implemented, the better it will be for the Forest and for the surrounding community.

We appreciate the analysis of the No-Action alternative that shows the risk of not actively managing these overstocked forests. Data shows that, in general, wildfires have increased in size, duration, and severity over the

past 20 years. Wildfire risk has also increased due to accumulating fuels, a warming climate, and expanding development in the wildland-urban interface. The risk has reached crisis proportions in the West, calling for decisive action to reduce risk to communities as well as improve forest health and resilience to future wildfire events. Further, increased tree density and tree succession has resulted in a higher susceptibility to insects, disease, and drought as trees compete for sunlight, water, and nutrients. Past and on-going tree mortality is evident, which subsequently has resulted in an increase of hazardous fuels and higher risk of wildfire.

All of these factors point to an imminent catastrophic wildfire impacting the area, much like the West Fork fire in 2017 and the South Yaak Fire in 2021 on the Kootenai.

AFRC is pleased to see that the Draft EA states: "Fire modeling indicates there is a risk of crown fire under existing conditions. These areas would also exhibit flame lengths and rates of spread that would require indirect suppression tactics utilizing mechanized equipment and aviation resources. Fire hazard would increase over time, as stand conditions continue to deteriorate in the analysis area due to insects, disease, wind and snow. Eventually, wildland fires have a greater chance to burn in large continuous patch sizes due to the lack of breaks in the forest canopy and heavy fuel loading, putting homes and private property at risk in forest vegetation report of the existing condition fuel continuity."

4. AFRC supports the District's plan to manage forests classified as old growth and those classified as "recruitment potential" for old growth with prescribed burning and tree harvesting. The treatment designs include retaining the large old trees, decreasing the number of smaller trees and reintroducing fire into those stands. All harvest treatments in old growth would be intermediate treatments. Treatments in the drier forest types would allow the ability to improve resiliency, resulting in stands more able to withstand bark beetle mortality and stand-replacing fire. AFRC supports the Draft EA language which states: "The Project proposes treatment of 171 acres of old growth and 155 acres in recruitment potential old growth and is consistent with the 2015 Forest Plan and aligns with Executive Order 14072. All proposed treatment prescriptions are designated to maintain and/or restore the characteristics that contribute to meeting the definition of old growth or recruitment potential old growth."

5. AFRC also supports the creation of openings larger than 40 acres. The Proposed Action designates five units proposed for regeneration harvest that would create two forest openings larger than 40 acres. These larger openings are needed for forest health treatments. Forest Service Manual (FSM) 2471.1 allows for this size limit to be exceeded with Regional Forester approval and 60-day public notice.

6. We would like the District to recognize that one of the primary issues affecting the ability of our members to feasibly treat the land and deliver logs to their mills is 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 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 market area with a variety of skills and equipment. Developing contracts that firmly describe 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 Final Analysis and contracts 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 feller-bunchers 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. Please prepare your NEPA analysis documents in a manner that will facilitate flexibility in the use of various types of equipment. AFRC believes that with some of the lighter touch logging methods as mentioned above, the impacts could even be less than those analyzed.

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.

We appreciate the District's plan which is: "Avoid tractor logging on unstable slopes and sustained slopes greater than 40% (small areas of the unit may have slopes > 40%). Also areas unsuitable for tractor logging were designated as skyline, forwarder, or winter harvest units; or were dropped from the unit."

We also appreciate the inclusion of tethered-assist equipment in the EA. Tethered-assist logging is becoming a more reliable, economical and safe option for treating steep ground.

7. AFRC supports the use of shaded fuel breaks. As pointed out in the scoping document, the entire project area is in the WUI, which includes hundreds of private homes along St. Regis haul road (Garrison loop), Callahan Creek, Iron Creek, Iron Grouse, Lake Creek, and Copper Creek. Reducing hazardous fuels near and adjacent to public open roads is important because those roads serve as emergency egress routes for evacuating people and ingress for emergency personnel and equipment when wildfires or other emergencies occur. AFRC would suggest conducting fuel breaks of at least 300 ft. on both sides of these roads and reducing the basal area down to 40 sq.ft/acre.

AFRC appreciates the Districts response to this request: "Treatments are proposed along the PLODS on NFS lands, including the areas mentioned. While the prescription is not defined as a "shaded fuel break" per se, the site-specific prescription and associated treatment name will function as fuel breaks in the event of a wildfire."

8. AFRC appreciates how the Forest characterized the impacts to carbon pools resulting from the proposed vegetation treatments. Much of the input that we provided in our scoping comments was incorporated, specifically the input that illustrates the benefits of reducing the risk of high-intensity wildfire and the benefits of carbon stored in long-lasting wood products. However, we are concerned with how the "social cost" of carbon is quantified in the Project Scale Carbon Effects report. This quantification is limited to the effects of road construction. This limitation may give an incomplete or distorted characterization of the project's actual "social cost" for carbon. The dollar figures show in Table 1 of the report do not account for:

a. The social cost of elevated fire risk of taking no action.

b. The social cost of slower forest growth rates (less carbon sequestration) resulting from overly dense forests following no action.

c. The social cost of producing fewer wood products that will result in loss of substitution benefits-using building products with larger carbon footprints such as concrete or steel.

We understand that quantifying the "costs" listed above may be difficult, however, these costs are real and must be captured in these reports somehow. If they are not, the public will simply walk away thinking that the dollar figures in Table 1 are the sole and ultimate costs. The notion that walking away from our National Forests and "doing nothing" is the pathway to maximizing carbon storage, carbon sequestration, and overall climate change mitigation outcomes must be dispelled through project-level NEPA analysis.

We would like the Forest Service to develop procedures that estimate the costs, shown in dollar amounts, of reasonably foreseeable outcomes of taking no action. Two obvious reasonably foreseeable outcomes would be high-intensity wildfire and slowed growth rates due to overly dense forest stands. The first outcome would result in a spike in carbon emissions followed by reduced carbon sequestration potential; the second would result in reduced carbon sequestration potential.

Ultimately, we think the Forest Service must broaden the scope of their carbon analysis beyond simply the emissions resulting from road work.

Thank you for the opportunity to provide Draft EA comments on the Trojan Defense Project. We look forward to it being implemented soon.

Sincerely,

Tom Partin

AFRC Consultant