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Title:

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Dear Project Manager,

Offered on behalf of Sun Mountain Lumber in Deer Lodge Montana, these comments are provided in support of the Bitterroot Front Project. We want to thank the forest for all their hard work to develop this project and providing us with the opportunity to be involved with several public meetings and provide these scoping comments.

With a long history of working with and supporting forest management projects across the Bitterroot National Forest and having toured the project area on several occasions including one field trip provided by the Forest, we are familiar with the project area and understand the dire need to address forest management issues with this large landscape scale project.

We support Project Objectives that include, Reduce Fuels, Improve landscape resilience, Modify forest structure and composition, Improve wildlife habitat, Contribute to local economy, and other resource objectives as opportunities become available. The Purpose and Need, which we also support, highlights the need to reduce the risk of wildfire and improve public safety by modifying forest structure and composition and opening up forest canopies to reduce the risk of crown fires and provide opportunities to return fire to the landscape. While we support these Objectives and the Purpose and Need, we offer the following comments we believe improve and build on project outcomes.

A large portion of the project area has been identified as a high priority area within the Montana Forest Action Plan and has 5 of the top 10 Firesheds facing the most wildfire risk in Montana. Additionally, A large portion of the project area falls within the Community Wildfire Protection Zone (CPZ) and the Wildland Urban Interface (WUI) where communities are at high risk in the event of a wildfire.

Forests within the project area are stressed with overstocked conditions competing for a limited supply of water. Stressed trees are more susceptible to the effects of insect, disease, and fire. Western pine beetle, mountain pine beetle, Douglas-fir beetle, western spruce budworm and dwarf mistletoe are all active in the project area. These stressed forest conditions along with the dense understory and excessive surface fuels have created extreme conditions for potential catastrophic wildfires, highlighting the need to keep management options open that would allow the use of a variety of treatment types and methods to maximize the number of acres treated in the project area. Advancements in equipment and logging methods in recent years has increased opportunities to access and treat more acres commercially with minimal ground disturbance. We strongly recommend avoiding comments that restrict management options such as regeneration harvest will be "less than 40 acres". While these types of statements may be popular, they may not allow appropriate silvicultural treatments to be implemented once stand diagnosis has been completed.

2. We support the proposal to target smaller diameter trees for removal in the intermediate harvest units but not if the larger trees are showing signs of affects from insects and disease. Leave trees should not be selected simply based on the size class. Healthy smaller diameter trees should be chosen for leave trees rather than lager

diameter unhealthy trees.

3. In order to open the canopy up enough to effectively reduce the potential for the stand to carry a crown fire, we recommend leaving a basal area of not more than 40 square feet per acre.

4. The departure from natural fire disturbance (sited in the scoping document as the primary reason for current forest conditions) has certainly played a big part in current forest health issues. However, commercial timber harvesting has also seen a departure from its historical roll on our forests. In fact, the first sawmill in Montana was established in 1840 in Stevensville, Montana, 182 years ago. The lack of commercial forest management cannot be discounted as part of the problem as well.

In the mid to late 1980's USFS volume sold commercially nationwide, dropped by approximately 520 percent over a 15-year period, to an all-time low in 2001. During this same time period the number of acres burned by wildfires grew by nearly 319 percent, increasing to 525 percent and 10 million acres in 2006, a trend that repeated itself in 2007, 2011, 2012, 2015, 2017, 2018, and 2020. The relationship between the reduction of commercial timber harvest and the increase in the size, intensity, and severity of wildfires is not a coincidence. The proposed action in the scoping document under vegetation and fuels management illustrates the benefit of recent and past commercial treatments.

Page 9, item 2 states that recent harvest units treated as part of 5 separate timber sales, as well as all regeneration harvests completed since 1980 were excluded from commercial harvest because they already meet desired species composition and stand density is already at lower risk from severe wildfire and insect and disease impacts.

The beneficial effects provided by recent and past Commercial timber harvest are undeniable. Therefore, including commercial timber harvest over this large landscape as one of the primary management tools is both appropriate and necessary.

As proposed, the project will treat 55,133 acres with commercial treatments, over 38 percent of the project area. Of this, just over 13,000 acres are within Inventoried Roadless Areas. We support these management activities and want to thank the forest for acknowledging the beneficial use of commercial treatments to achieve project objectives while recognizing the important roll and obligation the Forest has to help sustain a viable local economy.

The sale of commercial products is the only activity associated with forest management that generates project dollars. Dollars received through timber receipts will help pay for all other work needed to fully implement the objectives for this project and successfully meet the purpose and need.

5. Using other non-commercial management activities, including fire, to fully achieve management objectives is also needed. However, With unprecedented growth and new home construction extending to our forest boundaries, fire should only be used in conjunction with other types of treatments or to achieve management objectives in areas that are inaccessible or do not allow commercial treatments, and then only after other activities have been completed to maximize public and firefighter safety.

The same advancements in mechanized equipment used to perform commercial treatments, can also be used to accomplish non-commercial treatments as well, making it possible to treat more acres in a much safer manner on a much larger scale. While broadcast burning provides its own set of benefits, we would like to see the Forest Service consider piling and burning as a better option. Pile burning can be done during a time of year when fire is not likely to spread and, if administered properly the thick layer of smoke created by broadcast burning can be reduced dramatically.

6. We support site preparation and tree planting throughout the project area as appropriate to achieve desirable stocking levels and ensure we have productive forests into the future.

7. We support all activities to improve road systems to address sediment impacts in streams and ensure the road system provides adequate access for land management activities and recreational use. We support the construction of new permanent roads in areas needed for this project and future management needs. Shaded fuel breaks along roads have been proven to improve public and firefighter safety and will provide an effective fire break to help safely return fire to the landscape.

8. We support the project specific forest plan amendments proposed for this project. These amendments would modify elk habitat objectives, old growth, coarse woody debris, and snag retention components within the forest plan for this project only.

Once fully implemented, the 143,983-acre project will achieve desired outcomes to improve forest health, improve landscape resistance and resiliency to the effects of insects, disease, and wildfire, provide for public and firefighter safety, reduce fire risk to communities, improve wildlife habitat, improve community economics by providing commercial forest products and creating jobs, and improve and increase recreational opportunities that also contribute to the economic stability of our rural communities. With 99 percent of the surface ownership within the project area in NFS lands, and the extreme risk fire poses to public safety and personal property damage, the Forest has an opportunity, and an obligation, to implement a management strategy across this landscape that will maximize these desired outcomes and fully achieve project objectives.

In closing, this project certainly has its challenges economically, socially, and geographically. Litigation, or at least the threat of litigation is inevitably in its future. We hope the forest will not be detoured by this and adopt a final decision that maximizes acres treated and fully accomplishes all projects objectives identified in the scoping document. We look forward to working with you on this and other projects in the future.

Respectfully,

Sun Mountain Lumber