VIA Email: appeals-northern-regionaloffice@usda.gov

November 30, 2020

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804)

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment during the Objection Period on the Frozen Moose 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 Flathead 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.

AFRC is not writing to submit a formal objection, since the objection period is open, but rather to support your Draft Record of Decision and to thank you for responding to some of our comments. We still believe that with site specific conditions on the ground, some of our earlier comments to the Project can still be implemented. AFRC submitted comments for the Draft EA on July 23, 2020, thus giving us standing during the Objection Period.

For context that we will refer to later, the project area is approximately 151,200 acres and is bounded to the north by the Canadian border, to the west by the Kootenai National Forest, and to the east by the North Fork of the Flathead River. Ownership within the project area is 92 percent National Forest System (NFS) lands (139,869 acres). Approximately 27 percent (40,447 acres) of the project area is located within the wildland-urban interface, established by the Flathead

County Community Wildfire Protection Plan (2011) and approximately 88 percent (7,184 acres) of proposed vegetation treatments are within the wildland-urban interface.

AFRC supports the Purpose and Needs for the Project which are to:

- Reduce tree densities and fuel loadings within the wildland-urban interface to result in less intense fire behavior near communities and facilitate safe wildland fire operations.
- Improve the diversity and resilience of vegetative communities and associated wildlife habitat.
- Maintain and improve aquatic ecosystems.
- Provide a mix of forest products to contribute to economic sustainability, providing jobs and income to local economies.

From our Draft EA comments, attending the Frozen Moose virtual meeting on July 16, and changes in the Draft EA from the scoping document AFRC would like to highlight why we support the Frozen Moose Project moving forward.

1. We were pleased to see that the Forest included additional acres in units 101, 284, 285, and 289. However, even with these additions the Forest is only commercially treating about 3,377 acres of the total 42,191 acres designated as General Forest in the low intensity and high intensity management category. While we appreciate the estimated 11.1 mmbf of timber planned to come from this Project, we believe there are additional opportunities. We would still encourage the District to examine potential other acres that could be commercially treated and perhaps have them listed as optional. In addition to getting the acres treated, we would like to remind the Forest that the National Forests in Montana are very important for providing the raw materials that sawmills within the State need to operate. The timber products provided by the Forest Service 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. 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. 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. Studies in Montana have shown that between 12 and 15 direct and indirect jobs are created with every million board feet of timber harvested. Thus, the local community have significant social and economic ties to National Forest Service lands.

2. AFRC commented on the amount of acres in the WUI of this Project and the need to reduce tree densities and fuel loadings to mitigate fire behavior and reduce its intensity near communities and facilitate safe wildland fire operations. We applaud the Forest for recognizing the need for treatments in these areas, but again, we believe the Forest should look for additional acres to treat within the WUI which covers 40,447 acres. Additionally,

on those acres that are treated, AFRC recommends that trees be thinned to wide spacings with 40 sq. ft. of basal area being the retention goal.

AFRC further suggested that the use of shaded fuel breaks may be appropriate, especially in the WUI and along the major roads in the project area. These fuel breaks have been shown to be effective in slowing or stopping wildfires while at the same time improving the health and vigor of residual trees. We made this suggestion during the virtual meeting on July 16, and the Forest agreed this would most likely be used.

3. AFRC supports the proposed road plan on this Project including approximately 6.4 miles of temporary roads that would be constructed to the minimum standards necessary for log hauling on NFS roads. Some of the temporary roads will be constructed on existing road templates and some temporary roads will involve new construction. All temporary roads would be decommissioned following timber harvest activities and would cease to function as roads and made impassable to motorized vehicles. A total of 13 miles of historical road will be returned to the NFS system and placed in an impassable state following project activities. This would include approximately 9.5 miles of historical road beds reconstructed to the minimum standards necessary for project activities and then be returned to the NFS road system in intermittent stored service condition and made impassable to wheeled motorized vehicles.

   AFRC is pleased to see that while these roads won't be passable following completion of the Project, they will remain part of the NFS of roads and could be used at a later time. While we understand the need to do this work, AFRC believes that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. 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 quickly and directly attack nascent fires. 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.

4. Improving the diversity and resilience of wildlife is another Purpose for this Project. AFRC has long supported the need for creating early seral habitat especially where fire resistant species such as ponderosa pine and western larch are in short supply. We suggest and support the Forest using some clearcut and seed tree units in stands where shade tolerant and diseased trees are growing. There are 500 acres designated for seed tree harvest and should unit size need to be larger than 40 acres, it will require Regional Office approval. AFRC supports these treatments as the best way to take care of the silvicultural and wildlife needs of the stands.

5. Another Purpose and Need includes maintaining and improving aquatic ecosystems. The project area includes four streams identified as spawning and rearing bull trout critical habitat: Trail Creek, Whale Creek, Frozen Creek, and Red Meadow Creek. All these streams flow into the North Fork of the Flathead River which is designated foraging, migratory, and overwintering bull trout critical habitat.

   AFRC strongly supports the Forest's decision to conduct vegetation treatments within the riparian management zones which would promote desired conditions that maintain or improve ecosystem integrity and promote resilience of vegetation. In many areas, diverse structure in riparian management zones is promoted through natural ecosystem processes such as wildfire, insects, or disease.

   Within the wildland-urban interface, it may not be feasible to use prescribed fire to reduce fuel loadings, instead mechanical vegetation management activities can be used to meet desired conditions. These treatments could address not only stand-level conditions but also landscape level desired conditions, by adding to a pattern of forest conditions and structures across the broader landscape that contribute to altering potential future fire behavior and increasing the diversity of forest age classes, species composition, and forest density.

6. The primary issue affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. AFRC is pleased to see that the Forest has identified that ground skidding equipment may be used on slopes up to 40%. While we think in certain areas steeper slopes can be used using tractor equipment, this is a good place to start.

   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 aligned 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 Flathead market area with a variety of skills and equipment. Developing this 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 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. 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.

7. Another area of support is the Forest's planned work to pre-commercial thin 3,490 acres especially in areas that have burned in recent decades and the reproduction is extremely dense. These thinnings will improve tree vigor and more importantly reduce the fuels loadings. We also support other non-commercial activities such as thinning around white bark pine and fuels reduction in recommended wilderness area to reduce wildfire risk. AFRC supports post-timber harvest timber stand improvement including planting fire resistant early seral species and pre-commercial thinnings. Putting together an economically sound project will yield the retained receipts needed for this work.

Thank you for the opportunity to provide supporting comments during the objection phase of the Frozen Moose Project. I look forward to the Project moving forward to implementation and being part of your timber sale program in FY'22.

Sincerely,

Tom Partin
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