



VIA Comment: <https://www.fs.usda.gov/project/?project=51053%20>

August 1, 2022

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 provide supportive comments on the Greenhorn Project which is now out for Objections.

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 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.

AFRC is not writing this letter to Object to the Project, rather we think the Project needs to quickly move forward using Alternative 2. AFRC provided Draft EA comments on March 4, 2022.

About the Project: The Beaverhead-Deerlodge National Forest is proposing vegetation treatments including prescribed fire, non-commercial thinning, and commercial timber harvest on approximately 17,092 acres in the Greenhorn Range. Prescribed fire and non-commercial thinning are proposed on approximately 16,009 acres. Commercial thinning is proposed on approximately 1,047 acres and approximately 36 acres are proposed for stand clearcut followed

by prescribed fire. This project includes approximately 24 miles of existing road maintenance or reconstruction for use as haul routes to support timber harvest.

Purpose of the Project: The purpose of the Greenhorn Vegetation Project is to promote resiliency and ecological function by helping to restore and maintain the structure, function, composition, and connectivity of Forest terrestrial systems.

AFRC would like to outline the major reasons for our support along with suggested improvements during implementation:

1. The Project is in its second decade of planning by the Forest, collaborative groups, interested parties, and others. The Project was initially proposed to the Forest Service by the Gravelly Landscape Collaborative with technical support from the Madison Ranger District and the Beaverhead Deerlodge National Forest independent group of citizens identified the Greenhorn landscape as an area in need of restoration treatment in 2010-2011. Since that time a tremendous amount of mortality has occurred in the lodgepole pine and some in the Douglas-fir during those 12 years. AFRC, while not agreeing with all aspects of the Project, believes it is well past time for implementation and restoration of the lands within the Project area.
2. While disappointed that the Forest opted not to treat more acres commercially in the Draft Decision from the Draft EA, our members are much in need of the 9 MMBF of timber that will come from the 1,083 acres of commercial treatment.

Support of the manufacturing sector that depends on the B-D National Forest should be a consideration in any project development. 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. 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. The majority of the industry is centered in western Montana where the project is located. 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.

3. The Forest plans to treat 16,009 acres by non-commercial methods. These treatments are much needed in both the general forested areas and in the Roadless areas. While we support these treatments, we expect the Forest to be realistic about how expensive these

treatments are. The chart below shows the economics of the Project and the fact that the Forest is going to need to look for outside money to get the restoration work completed.

Table 49. Project feasibility and financial efficiency summary (2017 dollars)

Category	Measure	Proposed Action	No Action
Timber Harvest Information	Acres Harvested	1,084	0
Timber Harvest Information	Sawtimber Volume Harvested (CCF)	21,603	0
Timber Harvest Information	Base Rate (\$/CCF)	3.00	0
Timber Harvest Information	Appraised Stumpage Rate (\$/CCF)	9.55	0
Timber Harvest Information	Predicted High Bid (\$/CCF)	15.20	0
Timber Harvest Information	Total Revenue (Thousands of \$)	328	0
Timber Harvest & Required Design Features	Present net value (Thousands of 2017\$)	-91	0
Timber Harvest & All Other Planned Non-Timber Activities	Present net value (Thousands of 2017\$)	-563	0

This is not a point of disagreement, but rather a reality check that if the Forest wants to implement ALL of the restoration, additional funding will be needed.

4. Much of the litigation facing the B-D involves threatened and endangered species. AFRC believes the Forest has adequately analyzed the impacts to threatened and endangered species. For example, this Project would primarily treat Douglas-fir stands and some lodgepole pine stands. However, it would not affect the most suitable lynx habitat. After implementation, available lynx habitat acres would remain approximately the same percentage as currently mapped, and therefore the effects are negligible. Direct effects are minimized as lynx are not known to live in this area of the Greenhorn Mountains and a majority of the most suitable lynx habitat, including the highest quality, is not proposed for treatment. Although the potential for displacement during project implementation exists, it is unlikely and negligible. The Project follows all standards in the Northern Rockies Lynx Management Direction and no exceptions to the standards are used.

The project would not change the secure habitat available for grizzly bears in the analysis area. There is a 134-acre temporary impact to mapped grizzly bear secure habitat from the proposed action due to the 4.7 miles of temporary roads needed to access harvest units along Timber Creek road. Temporarily adding these miles to the road densities during implementation would not measurably increase the road densities in the

Landscape or Hunting District beyond current densities (these would remain at 0.7 miles per square mile).

5. AFRC supports the section in the Final EA describing the analysis work done on the carbon cycle. This proposal addresses site-specific forest health, fish and wildlife habitat trends, and risks that currently exist within the project area. These proposed actions are consistent with adaptation actions and strategies recommended for managing forests in light of climate change (Millar et al. 2007; Joyce et al. 2008; Ryan et al. 2008a).
Regulatory framework.

There are no applicable legal or regulatory requirements or established thresholds concerning management of forest carbon or greenhouse gas emissions. Guidance on climate change consideration in project related NEPA *“Focuses on the dual aspects of climate change: the effect of a proposed project on climate change through greenhouse gas emissions, and the effect of climate change on a proposed project. The guidance stresses considerations in pre-NEPA analyses, including the purpose and need and proposed action, scoping, alternative development, effects analysis, and decision documents. The focus of the guidance is to incorporate climate change into project NEPA that is relevant for the project decision. The Forest Service would revise this guidance as scientific understanding improves, climate-change-management experience is gained, and national policies are revised (USDA 2019).”*

AFRC still encourages the Forest to incorporate the carbon information we included in our Draft EA comments which briefly states:

“AFRC also believes carbon and carbon sequestration needs consideration in any analysis. We would like to encourage the Forest to consider several documents related to carbon sequestration and to forest management.”

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec,

Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. Ecological Applications, 0(0), 2019, e01979.”

6. AFRC is pleased that ground-based logging methods will be the primary method of timber removal. AFRC would also like to remind the Forest that 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. 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 and contracts.

During the implementation phase of the Greenhorn Project, AFRC 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 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. While we appreciate the language allowing ground skidding to occur on slopes over 35% if approved, we would like the Forest to allow ground-based equipment to operate on slopes 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 and available option for felling and yarding on steep slopes. This equipment has shown to contribute little additional ground disturbance when compared to traditional cable systems. It would be helpful to prepare your NEPA analysis documents in a manner that will facilitate this type of equipment.

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 makes surviving in the logging business that much more difficult.

Finally, AFRC suggested the use of Designation by Prescription (DxP) for this project. At recent purchasers' meetings in Region 1, purchasers and operators have generally favored the use of DxP and expressed overwhelming support for using this tool. This would be an excellent project for use of DxP. The various stands in both the Douglas-fir and lodgepole pine lend themselves to straight-forward prescriptions that could be laid out and implemented easily. This could also help with the economics of the Project.

7. AFRC supported the Road Management Plan which calls for the construction of 4.7 miles of temporary roads, and improvements to approximately 23.81 miles of existing forest system roads. What we want to emphasize during Project implementation is that we understand that there will be some need for road decommissioning, however, we would like to remind the Forest that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local

industry in an economical manner. The land base covered in the Greenhorn Project area is to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us. For roads to be decommissioned we propose the decommissioning should be done by use of barriers or blockage of the road entrances. AFRC does not support obliteration or recontouring roads that are to be decommissioned because of the high cost involved. The project is already very uneconomical.

Furthermore, there are alternative methods to mitigating potential resource damage caused by poorly designed or poorly maintained roads aside from full decommissioning. Removing or replacing ineffective culverts, installing waterbars, and blocking access are all activities that can mitigate resource damage while maintaining useful roads on the landscape for future use. Please consider these methods as an alternative to full decommissioning.

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 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 Service proposes to decommission, abandon, or obliterate road segments from the Greenhorn 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.

Thank you for the opportunity to provide a letter of support for the Greenhorn Project during the Objection Period. AFRC looks forward to its implementation in 2023.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Tom Partin
AFRC Consultant
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Portland, Oregon 97239