



VIA Email: appeals-northern-regional-office@fs.fed.us

July 2, 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 for the Horsefly 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 Helena-Lewis and Clark 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 scoping comments May 27, 2019, and Draft EA comments on January 24, 2020. Both of these documents may be referenced in these comments. Due to the amount of bug killed timber in this Project, AFRC believes the need to complete restoration work in the project area is paramount.

The Forest has outlined the Purpose and Need for the Project which AFRC supports. Those include:

- Improve forest health and landscape resiliency
 - Develop forest conditions that are more representative of historic conditions through a suite of integrated landscape management treatments that include implementation of mechanical and hand vegetation treatments in addition to the use of prescribed fire.
 - Enhance species, age class diversity, and density.
 - Maintain and/or improve resilience and resistance of old growth stands to current and future disturbances.
 - Restore the project area to a more natural fire regime.
- Reduce wildfire hazards
 - Improve conditions for fire suppression resources, the public safety, structures, and other valued resources and assets in the event of a wildfire.
- Provide wood products to local and regional economies.
 - Contribute short-term forest products to the local timber industry and provide for long-term sustainability of timber on National Forest System lands by utilizing dead and dying trees as well as live trees from the project area.

From the input letters that AFRC and others submitted, the Forest has chosen to implement alternative 2 with modifications. AFRC supports the Forest's decision to use this alternative, however, there were some changes from the Draft EA to the Modified Proposed Action that are pertinent to AFRC and our membership, and we would like to discuss some of those.

1. Approximately, 4,619 acres of commercial timber harvest would occur from the project area as a result of regeneration and/or intermediate treatments. This is a reduction from the proposed acreage in the Draft EA which was 5,141 acres. AFRC is not sure why this reduction was made, however, we suggest that perhaps some of those acres could be made as optional if economics was the major factor.

AFRC always encourages the Forest Service to treat as many acres as practical when preparing an EA or EIS. The expense of these planning documents is high and we feel it is important to get as much work done using this document. Treating more acres also adds to the timber volume that will be produced. 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 be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities where they operate. Evidence of the struggle to find raw materials for our Montana sawmills can be witnessed by the recent announcement of the closure of the R-Y mill in Townsend, Montana.

We would again 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.

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2. The Horsefly Vegetation Project proposes to implement regeneration harvest in eleven units that would result in openings greater than 40 acres in size. Created openings would range from 42 to 99 acres. AFRC supports the Forest's findings that there is a need to increase the size and scale of treatment areas to better match the size and scale of the insect and disease present within these stands. This would result in openings larger than 40 acres in many of the proposed harvest units. AFRC would support a forest plan amendment requesting the use of openings larger than 40 acres.

These larger openings will also help to shift this area towards the vegetative desired conditions providing a mosaic of age classes. Hardwood, shrub, and grass species are important sources of high-quality forage for deer and elk as they prepare for winter, over winter, and in the spring as they begin to replenish lost body mass from the previous winter. This proposal would retain and enhance aspen and provide valuable forage by reinvigorating existing shrub and grass communities making them more palatable and nutritious for big game species and other terrestrial wildlife.

AFRC supports a site-specific amendment for two standards which is needed to implement the proposed action. This amendment is a site-specific amendment and is applicable only to this project. This is a one-time exemption and is not intended to replace the existing standards. The standards that are the subject of this amendment are:

- C-1 (5): Require a big game cover analysis of projects involving significant vegetation removal to ensure that effective hiding cover is maintained. The cover analysis should be done on a drainage or elk herd unit basis. Drainages or elk herd units containing identified summer range/fall range will be maintained at 30 percent or greater effective hiding cover (USDA Forest Service 1986a, p. 2-30).
- Management Area C: Maintain effective hiding cover (see glossary) percentages by timber compartment at an average of 40 percent with a minimum of 35 percent (or the natural level if less than 35 percent) for any individual sub-compartment (USDA Forest Service 1986a, p. 3-16). The site-specific amendment would allow hiding cover to drop below forest-wide standard C-1(5) in two watersheds and further reduce hiding cover below the standard in up to four watersheds that are currently below the 30 percent hiding cover threshold. The amendment would also allow hiding cover to drop below the 40 percent threshold on management area C lands in timber compartment 707 and further reduce hiding cover on management area C lands in timber compartments 701, 706, 708, and 710 that do not currently meet the standard. The Forest Plan provides

standards for land and resource management. Generally, the standards must be utilized if attainment of the Forest Plan goals and objectives are to be realized. However, there will be some instances in which achievement of the goals and objectives is not facilitated by the standards (USDA Forest Service 1986a page 5-1).

Therefore, the Plan also provides that:

- If it is determined during project design that the best way to meet the management area goals of the Forest Plan conflicts with a Forest Plan standard, the Forest Supervisor may approve an exception to that standard for that project; such exceptions must be described in the Finding of No Significant Impact/Decision Notice for the project, and the rationale for making the exception must be described in the project's documentation (USDA Forest Service 1986a pages 2-23 and 5- 3).

AFRC took the picture below of the landscape in the Horsefly project in June of 2019. The picture shows the large degree of mortality within the sale area and highlights the need for immediate action and the reasons for the site-specific amendments.



3. AFRC would like to remind the Forest that the benefits of conducting a project 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.

AFRC has had several monitoring meetings with the Helena-Lewis and Clark Forest during which we discussed the economics of timber sales. One of the primary issues affecting the ability of our members to feasibly deliver logs to their mills are often the firm operating restrictions in contracts. 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's and 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 Helena-Lewis and Clark market area with a variety of skills and equipment. Developing an EA and 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 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. Please prepare your NEPA analysis documents in a manner that will facilitate this type of equipment.

4. Table 3 below describes the road work that is planned for this project.

Table 3. Road Treatment Miles – Proposed Action.

Road Treatment	Approximate Miles
Temporary Road Construction followed by obliteration (new construction and on existing non-system routes combined)	40.7
Reconditioning of System Road	32.2
Reconstruction of System Road	16.8
Relocation of System Road	1.7
Total Miles of Haul Routes	91.4

The Forest is proposing to manage various Forest Service Roads to accomplish their management objectives. Many of the roads in the project area have not received any maintenance for over a decade. Some of the roads are currently open and drivable while other roads are closed with a barrier and are often undrivable because of thick brush, downed trees and small trees growing in the road prism.

AFRC remains concerned about the possible large cost for Road Management activities. AFRC encourages the Forest to be cognizant of the cost of road work and road obliteration and not to overload the project with these expenses. 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 road obliteration of 40.7 miles of road in the Horsefly Project Record of Decision represents a **permanent** removal of these roads and likely the deferral of management of those forest stands that they provide access to. The land base covered in this Project area are 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.

We would like the Forest to carefully consider the following three factors when making a decision 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.

Additionally, the Forest has used the concept of fuel breaks along strategic roads. AFRC observed this on the Telegraph project. AFRC supports this concept and suggests that these breaks be included as part of the Horsefly Project, with access to so much WUI and access and egress roads. At a minimum, these breaks should be 300 feet wide on either side of those roads. The stands within those fuel breaks should be thinned to a wide spacing and low basal area to reduce the threat of a crown fire going through the area. The purpose of the fuel breaks is to get the fire to lay down on the ground for suppression purposes.

Another factor contributing to timber sale economic viability is rock source for required and/or optional road work. Costs associated with hauling rock long distances has been escalating in recent years and often represents a significant cost in timber sale implementation for our members. Quarry development (new or existing) on in close proximity to the Trails project should be considered if available. The value of having a good rock source close to future timber sales should be strongly considered.

5. AFRC would like to again go on record of supporting the Forest in their analysis of several wildlife species including goshawk, wolverine, elk, grizzly bear and lynx. The Record of Decision contains many pages of well documented information as to how this project will not affect or actually benefit these species.
6. While the Record of Decision contains language regarding the carbon benefits of treatments in the Horsefly Project, AFRC would still like the Forest to bolster its record with several documents related to carbon sequestration related 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.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9– 18% when compared to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. *Ecosphere* 7(1):e01224.10.1002/ecs2.1224

Key points of the Gray paper include:

- Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

Thank you for the opportunity to provide comments during the Horsefly Vegetation Project Objection Period. Again, while AFRC has some concerns and suggestions for Project implementation, overall we are very supportive of the Horsefly Project moving forward to implementation.

Sincerely,

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

Tom Partin
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Portland, Oregon 97239