



VIA Email: comments-northern-kootenai-cabinet@fs.fed.us

October 26, 2018

John Gubel, District Ranger
Cabinet Ranger District
Kootenai National Forest
2693 Highway 200
Trout Creek, Montana 59874

Dear John:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Purple Marten Project scoping document.

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 Purple Marten Project is located approximately seven miles northwest of Trout Creek, Montana. The project boundary encompasses about 11,200 acres, of which about 5,747 acres are in Inventoried Roadless Areas. The Purple Marten Project is within an area designated as part of an insect and disease treatment program in accordance with Title VI, Section 602, HFRA, as amended by Section 8204 of the Agriculture Act (Farm Bill) of 2014. The Purple Marten Project may be carried out in accordance with Title VI, section 602 (d). This HFRA section provides for expedited NEPA reviews, pre-decisional objection review, and guidance on judicial review.

AFRC has read the Purpose and Need for the project and we support your assessment which includes:

- Build resilience to insects and diseases through diversification of tree densities, structural stages, and species composition.
- Provide forest products that contribute to the sustainable supply of timber products from National Forest System (NFS) lands.

- Reduce fire risk in the vicinity of essential infrastructure from Marten Creek Bay to the north end of Stevens Creek and in areas adjacent to the power line rights-of-way.
- Enhance the quality and quantity of forage for big game species on winter range.
- Create a safe and sustainable trail system in the Kismet Creek area for motorized users while reducing the total miles of designated motorized trail within Inventoried Roadless Areas.
- Enhance the visitors experience at the Marten Creek Campground by increasing the camp site capacity.

AFRC strongly supports this project and believes the Forest is using the appropriate tool by analyzing this project under the parameters listed in the 2014 Farm Bill and using expedited procedures. We offer the following suggestions that may help the project as you move forward to implementation.

1. The project area includes 5,453 acres outside of Inventoried Roadless Areas and approximately 5,342 acres of MA6 (general forest) are within the project area. The Forest is currently planning commercial treatments on 1,023 acres or about 19% of the available acres. AFRC encourages the Forest to do extensive stand exams over the 5,453 acres to evaluate if there may be other acres in need of and available for commercial treatments. The addition of more acres of commercial harvest to the project will reduce the cost per MBF of planning and provide more raw materials to the facilities that depend on them.

AFRC members are struggling to find the needed raw materials to run their facilities and keep employment levels at their current rate. With these factors in mind we encourage you to look at doing a larger project footprint to generate more volume for the logging and sawmilling infrastructure, and to provide more funds to do the needed restoration work such as replanting.

Currently, Montana's forest products industry is one of the largest components of manufacturing in the state and employs roughly 7,700 workers earning about \$335 million in compensation annually. The majority of the industry is centered in western Montana where the Caribou project is located. Additionally, AFRC members are struggling to find needed raw materials to run their operations and keep employment levels at their current rate. With these factors in mind we encourage you to look at doing a larger salvage effort to generate more volume for the logging and sawmilling infrastructure, and to provide more funds to do the needed restoration work such as replanting.

2. About 2,166 acres of the Purple Marten Project area is located in the WUI, of which 712 acres are proposed for fuel reduction treatments. Fuel reduction treatments would include mechanical removal of trees, hand slashing, pile burning, underburning, natural fuels/ecosystem burning, and mechanical slash treatments. AFRC encourages the Forest to analyze if more WUI acres could be treated under this project. We also suggest the Forest thin out these stands to a wide spacing to reduce the risk of catastrophic wildfire

and insect and disease attacks on the adjacent private lands. Thinning to a wider spacing will also increase the volume to be removed and help the economics of the sale.

3. AFRC supports the use of regeneration and intermediate harvest techniques to limit damage occurring from insects and diseases to specific timber stands through tree species conversion to those species more resilient to insects and diseases. Further, nearly all of the mid-successional stands found within the project area are affected to some degree by root disease as well as an array of secondary damaging agents. Root disease is a disease of the site and cannot be eradicated, thus the site must be converted to less susceptible tree species such as western larch, ponderosa pine, and western white pine.

Regeneration harvest is also an integral component of a vegetation management program that strives to ensure a sustainable supply of timber products. Our members depend not only on a near-term supply of timber but also on the understanding that that supply will be available in the long-term. AFRC has voiced our concerns in the past regarding the sustainability of a vegetation management paradigm comprised exclusively of thinning and have repeatedly stressed the importance of incorporating a regeneration component into this paradigm. We urge the Cabinet Ranger District to consider incorporating the objective of sustained-yield timber management into the project's Purpose and Need statement to capture this important aspect of your management plan and the Forest Service's overall mission.

We also support the creation of four openings greater than 40 acres. Those harvest areas range in size from 95 to 288 acres. AFRC would support the Forest requesting a Forest Plan amendment to treat those areas if needed.

4. AFRC encourages the Forest to use regeneration harvest as a tool to create additional winter and spring forage for big game species on winter range in accordance with the Forest Plan Desired Conditions. The current conditions are skewed toward cover and do not provide adequate winter forage. Regeneration harvests encourages the growth of early seral species thus increasing that forage component.
5. Since the Forest will be using an abundance of regeneration and intermediate harvest techniques, AFRC suggests the Forest consider using DXP as a tool for minimizing the amount of timber marking that will need to be done, thus a cost savings to both the Forest and to the purchaser.
6. AFRC supports the proposed road work package which includes the construction of 4 miles of new road construction, 1.1 miles of temporary road construction, and haul route road reconstruction and reconditioning on 17 miles of existing roads. Since road maintenance funds on a national basis have been greatly reduced, the Forest should use projects like Purple Marten to get backlog maintenance work done on system roads in the project area.
7. The Forest has done an extensive analysis of existing Detrimental Soil Disturbance for units proposed in the Purple Marten project area (table 7). AFRC believes the Forest

should also analyze what the soil conditions would be like following a large catastrophic fire in the area should there not be forest health treatments. This no-action analysis on soils could impact the amount of soil disturbance the Forest could allow during commercial harvests. Perhaps disturbance on a larger part of the area during mechanical treatment is better than the entire area being baked in a wildfire.

8. The Forest has done a good job of analyzing the impacts of the project on Canada lynx and grizzly bear. The area is considered occupied lynx habitat but does not contain any identified lynx critical habitat. Lynx have not been detected in the project area. All treatments would conform to Forest Plan direction for lynx habitat management.

The project area is located within the Clark Fork Bears Outside the Recovery Zone (BORZ) polygon as an area where recurring use by grizzlies outside of the Cabinet-Yaak ecosystem has been documented. The most recent sighting in the project area was in 1984). Vegetation management would move the area towards desired conditions as described in the Forest Plan, increasing the amount of early successional foraging habitat and maintaining a matrix of older age classes providing cover and security. All new and temporary roads constructed for the project would be restricted to the general public by gates during operations. New permanent road would be barriered upon completion of project activities so that following completion of the project open and total road density would return to pre-project levels.

In closing, AFRC would like commend the Forest for utilizing Title VI, section 602 (d) of the 2014 Farm Bill to expedite treatment on this project area and utilizing to a large extent regeneration harvests. We strongly encourage the Forest to analyze all possible acres for treatment using stand exams or other methods to fully ascertain all acres that need treatment both in the general forest area and in the WUI. The Region has been tasked with ramping up their annual timber targets and one way of achieving this is to treat a maximum number of acres within each project that is analyzed.

Thank you for the opportunity to provide comments on the Purple Marten scoping. I look forward to following the implementation of this project as it moves forward.

Sincerely,



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