



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

November 3, 2018

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

Dear John:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Okay Salvage 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 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 proposed project area is in the McKay Creek drainage, four miles from Noxon, MT. The area encompasses a total of 25 acres of National Forest System lands. The Cabinet Ranger District was informed of numerous dead and dying trees on National Forest System lands directly adjacent to private property. A site visit by district staff confirmed the presence of forest health issues as well as hazardous fuels concerns within the Wildland Urban Interface. The Forest is acting promptly to get this hazard taken care of.

AFRC supports the purpose and need of the project which is to recover the economic value of the dead and dying trees, and to regenerate the site with fire-adapted trees which are resistant to insects and disease; and reduce hazardous fuels.

AFRC also supports the project being categorically excluded from documentation in an environmental impact statement or an environmental assessment. The applicable category of actions is identified in agency procedures as 36 CFR 220.6(e)(13) as "Salvage of dead and/or dying trees not to exceed 250 acres, requiring no more than ½ mile of temporary road construction..." This category would be applicable because the project proposes a salvage harvest of 25 acres infected by insects and disease, would require less than ½ mile of temporary

road, and would result in no impacts to any extraordinary circumstances. Implementation of the proposed action could begin November 2018. AFRC also supports immediate implementation after the comment period.

AFRC supports the silvicultural prescription of leaving those healthy and desirable trees, expected to resist disease for the foreseeable future. An estimated 5-15 trees per acre would be retained for diversity of vertical stand structure, seed sources, and future snags. There is no old growth within the project area.

Thank you for the opportunity to provide comments on the Okay salvage project, and we are pleased the Forest took such quick action to alleviate this forest health problem. I look forward to following the implementation of this project as it moves forward.

Sincerely,

A handwritten signature in cursive script that reads "Tom Partin". The signature is written in dark ink and is positioned above the typed name.

Tom Partin
AFRC Consultant
P.O. Box 1934
Lake Oswego, Oregon 97035