



**VIA Email:** [comments-northern-Kootenai-libby@fs.fed.us](mailto:comments-northern-Kootenai-libby@fs.fed.us)

November 14, 2018

Attn: John Carlson, Team Leader  
Kootenai National Forest  
Supervisor's Office  
31374 Hwy 2  
Libby, MT 59923

Dear John:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the West Surprise Vegetation Management 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 West Surprise Vegetation Management Project is located approximately 10 miles southeast of Libby, Montana. The project covers over 18,108 acres; however, treatments/activities are only proposed on approximately 2,996 acres. The reason the treatment acreage is below 3,000 acres is due to how this project will be planned and carried out. The West Surprise Project area is designated as part of an insect and disease treatment program in accordance with Title VI, Section 602, of the Healthy Forests Restoration Act (HFRA), as amended by Section 8204 of the Agriculture Act (Farm Bill) of 2014. To be designated, areas must be: 1) Experiencing declining forest health, based on annual forest health surveys conducted by the Secretary; 2) At risk of experiencing substantially increased tree mortality over the next 15 years due to insect or disease infestation based on the most recent National Insect and Disease Risk Map published by the Forest Service; or 3) In an area in which the risk of hazard trees poses an imminent risk to public infrastructure, health or safety.

The West Surprise project area qualifies under the above mentioned authority because many of the stand qualifications are met.

- Bark beetles, such as the fir engraver beetle and the Douglas-fir bark beetle, are killing substantial amounts of grand fir and Douglas-fir trees. Tree mortality from the bark beetles is elevating the hazardous fuels in numerous stands in the project area as well as decreasing the productivity of the stands.
- Root diseases are currently killing numerous trees and are otherwise impacting a lot of the forest stands in the project area. Armillaria, annosus and laminated root disease fungi are killing a substantial amount of the grand fir and Douglas-fir trees.
- Although the project area is not technically in the wildland urban interface as defined by the Lincoln County Wildfire Mitigation Plan (LCWMP), it does pose a significant risk to the private lands which are adjacent if a wildfire was to start within the project area.

Based on these conditions, AFRC supports the purpose and need for the project which initially included:

1. Reduce the risk or extent of, or increase resilience to, insect or disease infestation.
2. Reduce wildfire risk to surrounding private, state, and federal lands.

In addition to the first two purpose and need, two more were suggested following an open house on September 19. Those additional purpose and need for the project included:

3. Provide timber products to local mills and support the local economy through job creation.
4. Support wildlife habitat improvement and watershed restoration activities (aquatic organism passage replacements, road decommissioning, weed treatments etc.).

While AFRC strongly supports the project we offer the following comments that we believe might make the project stronger.

1. AFRC believes that the Forest should adopt the third purpose and need for the project which is to provide timber products to local mill and support the local economy through job creation and providing employment in timber dependent communities.

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 West Surprise 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 the Forest 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. AFRC also supports your efforts to use the Farm bill tools you have outlined to quickly move this project forward.

2. This project area is adjacent to the Tamarack fire that burned in 2017. The timber stands in the area exhibit many of the same poor forest health features found in the area that burned thus creating an urgent need for management. As mentioned above, bark beetles

are killing substantial amounts of grand fir and Douglas-fir trees, and root diseases are currently killing numerous trees and impacting a lot of the forest stands thus creating a high buildup of hazardous forest fuels.

AFRC believes that because of these factors, and the fact that all the land lies in MA 6-general forest, the silvicultural treatments needed are heavy thinnings, Shelterwood cuts, and regeneration cuts (clearcuts).

- AFRC believes that shelterwood or clearcuts should be used in areas of heavy root rot. This is the only way to get rid of species susceptible to root rot and establish early seral species such as ponderosa and white pine and western larch.
  - AFRC also suggests that clearcuts or heavy shelterwood harvests be used in area where wildlife cover is excessive and early seral plant stages are necessary. Opening up these stands will enhance wildlife forage and help to rebuild resident deer and elk populations.
  - Within the project area there are 2,204 acres of land owned by Weyerhaeuser. AFRC suggests the Forest treat as many acres as possible using heavy commercial thinnings to treat this Wildland Urban Interface. Heavy thinnings and other stand improvement work will keep insects and disease from spreading from national forest land onto private land.
3. To accomplish the needed silvicultural treatments in this project, it is also desired that regeneration harvests will need to create a variety of patch sizes and stand structures that break up the homogenization and simplification of the current landscape pattern. To create a variety of patch sizes some of the proposed regeneration harvest activities would result in openings greater than 40 acres. AFRC supports requesting Regional Forester approval (FSM 2471.1) to get this work done.
  4. AFRC supports the guideline of using ground-based yarding on slopes up to 40%. Existing skid trails will be utilized to the greatest extent possible. However, with new equipment being used with improved skidding techniques in ground yarding, steeper slopes may be accessed with less soil and other resource damage using tethered logging or forwarders. AFRC would like the Forest to consider these logging methods on slopes over 40% should purchasers request it.

AFRC also appreciates the flexibility in skid trail spacing when mechanized felling and skidding would allow skid patterns to be closer provided slash mats are being utilized.

5. AFRC requests some flexibility in the winter logging standards which state: *“If any units are harvested in the winter, the following requirements are to be used--operate on a snow layer of 18 inches of settled snow or when the ground is frozen to a minimum depth of 3 inches.”* During some open winters these conditions are hard to meet particularly on lower elevations and decisions on logging should be made on a case by case basis.
6. AFRC suggests the Forest try using DXP for silvicultural work in some of the areas. The species and prescriptions seem to lend themselves to this kind of timber marking regime and would keep pre-operational marking costs lower.

7. AFRC supports the road plan for this project. Roads will be used and then closed or decommissioned rather than obliterated or returned back to the original profile of the land which is very expensive and doesn't allow for use of the roads in the future.
  - Temporary roads will be decommissioned when they are no longer needed.
  - Closed roads that are opened for project implementation will have a gate installed so the road remains closed during operations.
  - Roads that are legally closed but lack a barrier and are used for project implementation will be closed upon completion of the project.

Since road maintenance funds on a national basis have been greatly reduced, the Forest should use projects like West Surprise to get backlog maintenance work done on system roads in the project area.

8. Finally, AFRC believes this project meets the intent of using the Farm Bill 3,000-acre Categorical Exclusion and fits all of the criteria.
  - The project is in an area designated in accordance with section 602(b) and (c) of the Healthy Forests Restoration Act.
  - The project is in Condition Classes 2 or 3, Fire Regime Groups I, II, or III.
  - The project is not located in congressionally designated Wilderness and Wilderness Study Areas; in areas where the removal of vegetation is restricted or prohibited by statute or by Presidential proclamation; or in areas where the activities described above would be inconsistent with the applicable Land and Resource Management Plan.
  - The project's number of acres treated will not exceed 3,000 acres.
  - The project does not include the establishment of permanent roads. Additionally, if any temporary roads are constructed they will be removed no later than three years after the project is completed.
  - The project is being developed and implemented through a collaborative process that includes multiple interested persons representing diverse interests and is transparent and non-exclusive.

Again, AFRC applauds the Forest for using this Farm Bill tool to quickly treat this poor forest health area. Thank you for the opportunity to provide comments on the West Surprise project. I look forward to following the implementation of this project as it moves forward.

Sincerely,



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