



VIA Email: comments-nothern-lolo-ninemile@fs.fed.us

April 9, 2019

Tami Paulsen, Planning Team Leader
Lolo National Forest
24 Fort Missoula Road
Missoula, MT. 59804

Dear Tami:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Soldier Butler Draft EA.

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 Lolo 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 project area covers approximately 45,160 acres of which 86% or 38,677 acres are national forest lands. AFRC provided scoping comments in response to this project on March 13, 2017 and we asked that those comments become part of the record because we had just started tracking the projects on the Lolo on behalf of our new member Tricon Timber.

At that time AFRC supported and we continue to support the Purpose and Need for the project which includes:

- Decrease high intensity wildfire potential and enhance firefighter efficiency and safety.
- Maintain and provide for ingress and egress for public and firefighter safety.
- Maintain and enhance the resilience and resistance of forested vegetation communities to stressors (drought, wildfire, climate change, altered fire regimes and insects and disease).

Based on the input the Ninemile District received during scoping, some changes were made to the project. AFRC would like the District to consider the following comments that we believe will also enhance the project.

1. AFRC supports Alternative B (the modified proposed action) which calls for adding more mechanical treatments during this entry. Initially the project was to commercially thin 4,019 acres. The project now calls for mechanically treating 5,639 acres and harvesting an estimated 14.3 mmbf. Treating more acres will help to make the stands healthier, protect more of the wildland urban interface (WUI) and also make the project more economical. In addition, more volume of timber will be removed which is very important to the survival of the forest products industry in Montana. 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 Soldier Butler 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.
2. AFRC commented earlier on our concern about the large number of roads that were planned to be decommissioned. We appreciate the Forest taking a second look in the Draft EA. The road proposals were reviewed by the ID Team and some modifications were made. For example, in response to concerns about the proposal to close the Soldier Spur Road (NFS #18102), the decision was made to leave it open to the public. In response to comments requesting that roads proposed for storage or decommissioning be left in a manner that would allow use by mountain bikers, skiers, hikers, and hunters a resource protection measure was developed to leave a pathway to facilitate non-motorized access for these users. This should reduce the overall expense of decommissioning which AFRC appreciates.

While some modifications to the road package were made, AFRC would again like to remind the Forest that Subpart A of the Travel Management Rule requires the Forest Service to “identify the minimum road system needed for safe and efficient travel and for administration, *utilization*, and protection of National Forest System lands.” 36 C.F.R. § 212.5(b)(1) (emphasis added). This means the road system must address “the needs of recreation as well as forest administration, fire protection, and other national forest purposes. . . .” *Ctr. for Sierra Nevada Conservation v. U.S. Forest Serv.*, 832 F. Supp.2d 1138, 1156 (E.D. Cal. 2011). While the amount of road to be decommissioned has been reduced, so many road miles unnecessarily and improperly decommissioned degrades access to this area of the Forest, and would designate a minimum road system in the project area that is not sufficient. Further, AFRC would like to remind the Forest that one of the Purpose and Need for the project is to provide ingress and egress for public and firefighter safety.

3. The Ninemile area, where Soldier-Butler is located, is identified as a high priority for fuels reduction work. This area ranked fifth out of five priorities on the Ninemile Ranger District identified in the Missoula County Community Wildfire Protection Plan. Based on this information AFRC believes the Forest should conduct heavy thinnings in stands adjacent to the WUI leaving 40 sq. ft. of basal area in these areas. Under burnings could follow further reducing the fuels loading.
4. As stated above, AFRC supports Alternative B as modified. We do not support parts of Alternative C which would take 11 units out of the project and not allow any new road construction due to concerns about wildlife cover. The limiting factor for big game species such as deer and elk is not cover but forage. AFRC supports a site-specific Forest Plan Amendment that would allow for the amount of cover to drop below 50% in the winter range, for the sake of accomplishing fuels reduction. Further AFRC supports the Forest asking for Regional Office approval to create openings over 40 acres in size to increase the development of early seral species.
5. AFRC supports the site-specific Forest Plan amendment that would change the MA designation for about 76 acres in the Kennedy Creek drainage from MA 4 (active mineral extraction and processing operations) to MA 18 (winter range for deer, elk and bighorn sheep). This amendment is needed because the Kennedy Creek Mine has been abandoned and reclaimed.
6. AFRC encourages the Forest to treat stands in old-growth units. These stands are currently susceptible to wildfire and the fuel loadings need to be reduced. Thinning these stands will enhance growth and protect them from insects, disease and wildfire and ensure their survivability into the future.
7. AFRC continues to recommend using tractor skidding on slopes over 35% to more efficiently capture the economic value of the timber and to provide more revenues back to the Forest for other resource improvements. New skidding equipment and techniques allow the Forest to capture the timber value on steeper slopes while still protecting other resources such as soil and water.
8. AFRC suggests the Forest try using DXP for silvicultural work in this project. The species and prescriptions seem to lend themselves to this kind of timber marking regime and would keep pre-operational marking costs lower.
9. The Forest is planning to do a lot of prescribed fire in the project area for fuels reduction. AFRC recommends that the Forest insert programmatic language in the EA allowing for the salvage of fire burned material should the prescribed fire get too hot and crown out in green trees or if the fire should burn outside planned perimeter boundaries.
10. AFRC applauds the Forest in their analysis for both the lynx and Grizzly Bear. The Draft EA states, "It is unlikely that any of the proposed activities would have direct effects on any lynx individuals, as use of the project area is sporadic at best. The project has been designed to avoid any harmful actions to lynx or to their habitat, and to improve habitat

conditions for lynx in the future. Portions of several treatment units are within the LAU. These units are all in dry forest types that do not provide lynx habitat. Site-specific evaluations in each of these units have confirmed the lack of mesic forest types, lack of understory density needed to support snowshoe hares and lynx, and very low to no snowshoe hare use.”

Regarding Grizzly Bear— Both Alternative B and C have the same impact on the bear, the project: “May Affect, but is Not Likely to Adversely Affect” (NLAA) grizzly. “Because the Soldier-Butler project would not result in any changes to open public motorized routes, and because no other changes are proposed in the DCA with this project, there would be no changes to the motorized route densities, and thus no increase from the baseline, which is currently compatible with female grizzly occupancy.”

11. AFRC believes that analyzing this project using an Environmental Assessment (EA) is adequate since there appear to be no significant negative impacts on the landscape during proposed operations, rather the actions will improve forest health and benefit other resources as well as reducing the threat of catastrophic wildfire to the Forest and to adjacent land owned.

Thank you for the opportunity to provide comments on the Soldier-Butler Draft EA. 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 below the word "Sincerely,".

Tom Partin
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