



Via Email: comments-northern-lolo-superior@fs.fed.us

June 20, 2019

Carole Johnson
Superior Ranger District
209 W. Riverside Ave
Superior, MT 59872

Dear Carole:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Cruzane Mountain 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 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 Cruzane Mountain project area is located approximately 3 miles west of Haugen in Mineral County, Montana and just northeast of the community of Saltese. Cruzane Mountain is the dominant land feature and the project area is located between Interstate 90 and National Forest System Road 288. The project area covers approximately 3,790 acres. The majority of the project area is on National Forest System lands (3,347 acres or 88 percent) with approximately 443 acres on private lands (12 percent). No land management activities are being considered on these private lands.

The purposes of the Cruzane Mountain project are to address past and current insect and disease impacts that have increased the risk of severe wildfire within the project area. In order to support a more healthy and resilient forest in the future, there is a need to manage forest species composition, improve the genetic quality of the forest, and address the increased amount of fuels that have accumulated in the project area as a result of forest health impacts and lack of fire activity. This area is dominated by Douglas fir which is susceptible to multiple forest insects and disease, such as root rot, western spruce budworm, and Douglas fir beetle. High root rot mortality is already evident in these stands within the

project area. Additionally, Douglas fir can persist in the understory as a shade tolerant species and act as a ladder fuel, increasing the risk of crown fires. Generally, the dominance of Douglas fir within the project area is directly a result of long-term fire suppression. These characteristics create a need for management action.

The project area is mostly within the wildland-urban interface and most of the project area is within two miles of the at-risk community of Saltse. Bounded by Interstate 90 to the south, the Cruzane Mountain area also has an increased number of potential ignition sources from the freeway. This area was included in the 'West End' portion of the county described in the Mineral County Wildfire Protection Plan. Several residential areas have one way in and one way out, which does not provide an escape route for firefighters in a wildfire event.

After looking at the maps, and a description of the existing stand conditions, AFRC supports the purpose of this project which is to address insects, root rot, and heavy fuels build up, in addition to protecting private structures in the Wildland Urban Interface. AFRC also offers the following comments that we believe may help and strengthen the project.

1. AFRC is pleased that the District is looking at commercially treating 1,522 acres of the total 3,790 acres or 40% of the project area. AFRC suggests that the District performs stand exams on all of the timbered acres to make sure all acres needing treatments are included. Treating a maximum number of acres in each project helps to reduce the planning cost on a per thousand basis, provides more needed timber to the existing timber infrastructure, and improves the forest health over a larger area as well.

AFRC would like the Forest to identify one of the main purpose and needs for the project being to supply raw material to the existing sawmilling infrastructure. As pointed out the benefit of this project will also be for improving employment and income for the local communities. These plants are important for the jobs they create in local communities and for counties. 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 and central Montana where the Cruzane 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 believes supporting the infrastructure and local communities in the purpose and need helps to strengthen the NEPA record.

2. With the deteriorated condition of the Douglas-fir throughout the project area, and the dead and dying lodgepole, regeneration harvests will be necessary to establish new healthy stands. AFRC supports the Forest seeking Regional Forester approval to harvest areas larger than 40 acres needed to address forest health issues on 926 acres needing larger openings. The objective of these larger regeneration units is to remove dead or dying trees being affected by various insect and disease impacts, as well as shade tolerant species that are less resistant to fire and insects and disease. These harvests would promote shade intolerant species that are longer-lived and resistant to these impacts.

3. The Forest proposes to use several yarding systems dependent on the hillslope, resource concerns, and economic feasibility for various methods. These logging systems include tractor skidding, skyline, excaline, and high bank. AFRC recommends the Forest consider 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.
4. AFRC suggests that when seed tree, shelterwood, or commercial thinning harvests are used the leave tree spacing is kept to a maximum. Leaving 40 sq. ft. of basal area per acre usually provides good spacing for residual trees to allow for vigor in remaining trees and to reduce the fuels loading. This is particularly needed in the areas of the WUI where fuels reduction is needed to protect adjacent properties.
5. AFRC supports the road building and reconstruction proposal which includes building perhaps as much as 5.4 miles of new road and reconstruction and maintenance of 10 miles of road. Regarding road closures, AFRC favors the 3-SN, 3-DN and 3-D methods. The level 5 Decommissioning is very costly and AFRC believes good results for road closures can take place without using this method to a large extent. AFRC is pleased to see that it is being proposed for only .1 miles of road.
6. AFRC suggests the Forest try using DXP for silvicultural work in this project outside of units where clearcutting and regeneration harvests are proposed. 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 believes that needed silvicultural work can be accomplished both in the riparian zones and in the highly visual sensitive areas. Fuels reduction is needed in these areas, and in many instances the areas that have burned the hottest in the latest large wildfires such as Sunrise have been the riparian areas. Using light touch skidding techniques and removing less volume per acre in these areas would be compatible with the land designations.

Thank you for the opportunity to provide comments on the Cruzane Mountain Project scoping. 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 and address.

Tom Partin
AFRC Consultant
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