



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

July 29, 2019

Kristen Kaiser, District Ranger
Three Rivers Ranger District
12858 US Highway 2
Troy, Montana 59935

Dear Kristen:

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

AFRC provided scoping comments on this project on August 10, 2018. At that time we stated that we support the Purpose and Needs for this project which includes:

1. Provide forest products that contribute to the sustainable supply of timber products from National Forest System Lands.
2. Reduce the potential for high intensity wildfire while promoting desirable fire behavior characteristics and fuel conditions in the Wildland Urban Interface and other areas with values at risk.
3. Maintain or improve watershed conditions in order to provide water quantity, water quality, stream channel conditions, and native aquatic species habitat that support ecological functions and beneficial uses.
4. Improve big game winter range conditions and promote forage opportunities.

5. Maintain and improve the recreation opportunities in the project area.

While AFRC supports the Purpose and Needs for the project we are disappointed that many of the issues that we commented on during scoping were not analyzed from our perspective and included in the Draft EA. Some of our key concerns include:

1. AFRC understands that there are many land use allocations in the project area, including ESA species needs, however, we remain disappointed that of the 72,683 acres that could be available for commercial harvest and management, the Forest has chosen an alternative that only mechanically treats 4,100 acres or 5.6% of the land base. This low number of acres as we mentioned in scoping presents some big concerns on many fronts, but especially since 23,846 acres of the project area is in the WUI and very susceptible to large wildfires like the Forest witnessed in 2017.
2. AFRC does not believe the Forest can accomplish the Purpose and Needs for this project by only mechanically treating 5.6% of the land base. Specifically, the needs to contribute to the sustainable supply of timber products from National Forest lands, and the reduction of potential for high intensity wildfire while promoting desirable fire behavior characteristics and fuel conditions in the WUI and other areas with values at risk will not be met. In looking at the project map, it appears that a lot more work could be done in and around the WUI areas. AFRC suggests that the Forest review all of the forest health work outlined by the stand exams needed in these WUI areas, particularly with reference as to the fire intensity from the 2017 wildfires and make sure that adjacent properties and structures are protected.

Additionally, the project's focus is to maintain and improve forest landscape resiliency by providing for tree species, stocking levels, and landscape patterns that better resist insects, disease, and stand-replacing wildfire(s). Goals specific to the Black Ram project include:

- a. Promote early seral tree species including western larch, ponderosa pine, and western white pine
- b. Maintain or improve old growth character within existing old growth
- c. Encourage fire's ecological function on the landscape
- d. Improve resilience and resistance to insects, disease and
- e. Design size of treatments to be consistent with the patch size and pattern of the respective biophysical setting
- f. Diversify successional stages

Again, AFRC finds it hard to believe that these goals can be achieved by only treating 13,591 acres combined in mechanical and non-mechanical treatments (18.7%) of the project area.

3. AFRC does not support Alternative 3 which was Alternative 2 in the scoping document modified by removing road construction which deleted 461 acres of harvest. AFRC can agree to acres being reduced because of new information, however, as mentioned above none of the Alternatives really look at treating the maximum amount of manageable acres in the project area to accomplish the Purpose and Need thus AFRC cannot support any of the Alternatives.
4. AFRC would like to remind the Forest that the National Forests in Montana are very important for providing the raw materials that sawmills within the state need to operate since so much of the Forests are owned by the Forest Service. 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 annually. The majority of the industry is centered in western Montana where the project is located. The timber products provided by the Forest Service are crucial to the health of our membership and the counties and communities where they are present. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills.
5. AFRC supports the harvest of 437 acres in the old growth areas using intermediate harvests techniques. AFRC also supports using regeneration harvest techniques including shelterwood, seed trees, and clearcuts to create openings larger than 40 acres in size to address forest health and wildlife issues. Further, AFRC suggests thinning down to 40 sq.ft. or basal area in units where intermediate harvests will be performed. This will allow for more tree vigor and fuels reduction.
6. AFRC is very concerned about the cost of putting 34 miles of roads into storage, and decommissioning 3 miles of roads. AFRC does not support the decommissioning of roads using the Level 5 technique which is completely eliminating the roadbed by restoring natural condition and slopes with culverts removed. This is too cost prohibitive. AFRC will support putting roads into storage if they are not needed in the short-term for forest management needs, fire suppression, recreation etc. AFRC supports putting roads into storage by using low cost means such as traffic barriers, berms, or other barricade methods. AFRC understands that the number of roads open to the public must be kept to a minimum due to ESA and other needs, however, roads can be put into storage using low cost methods which we support.
7. A number of streams and drainages are present in the planning area and AFRC strongly encourages the Forest to enter into the riparian areas to remove some of the fuel loading and cover. Recent large wildfires have shown that some of the most severe burns and

resource damage have occurred in the riparian areas where the fuel loads are the highest. Creating openings in the riparian areas also allows more sunlight to enter which can enhance other vegetation and insect production for a variety of species that depend on them for food.

Work in Riparian Reserves to control stocking and acquire vegetation characteristics are needed to obtain Aquatic Conservation Strategy objectives. Such work would be appropriate for this project. Please see the extended information and studies that I sent in my scoping comments for further documentation.

8. The Forest is planning to perform prescribed fire on 7% of the project area or 7,034 acres. AFRC suggests that the Forest plan to allow salvage of burnt dead trees that occur in these prescribed fires should the burns get out of control. Often the Forest is expecting some mortality from the burns which is acceptable, however, prescribed fire areas that get out of control and burn hotter killing more trees should have some options for immediate salvage.
9. Carbon sequestration as it relates to climate change is a topic that often gets broadly analyzed in NEPA documents. The analysis that the Forest Service will likely be conducting through the ensuing environmental analysis will discuss forest health benefits, effects on carbon sequestration and storage potential and meeting the purpose and need all within the context of an economically viable timber sale. We would like the Kootenai National Forest to review the following summary of information and incorporate this into its environmental analysis. AFRC believes this will help educate the public about and disclose localized effects to the forested landscape regarding carbon sequestration, carbon storage, and climate change as a whole.

Background

The Black Ram Project consists of treatments including Variable Density Thinning and regeneration harvest which may affect the treated stands ability to resist, respond, or be resilient to climate change in the project area. The direct, indirect, and cumulative effects of carbon sequestration and storage and its relationship to climate change in regard to this project must be viewed at much larger scales than the general project area because the scientific literature regarding these, only support analysis on larger scales. There is a large body of literature on management strategies that have the greatest carbon sequestration benefit. In general, actively managing the forest will produce a positive net increase in carbon sequestration thus a positive benefit to reducing anthropogenic effects on climate change (IPCC, 2007). AFRC urges you to analyze the type of treatments being proposed and determine through the literature how they will affect carbon sequestration potential through time.

Please refer to the lengthy information regarding carbon sequestration that I submitted in my scoping comments to support your timber harvest strategies.

10. AFRC suggests 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. The nearby Colville National Forest is testing skidding on slopes up to 45%. Additionally, many acres have been bypassed in the past because of concern about damage to soil from compaction, erosion and other issues. Today's new high tech logging equipment has a very light footprint and damage to the soil resource is minimal.
11. AFRC suggests looking more at the use of DxP for any commercial harvests. We believe that better results can be achieved in a much more efficient, and cost effective manner by utilization of basal area thinning. On our recent tour of the West Surprise timber sale we discussed using DxP and the Forest thought it had good potential.

Thank you for the opportunity to provide Draft EA comments on the Black Ram Project. 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".

Tom Partin
AFRC Consultant
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