VIA Email: appeals-northern-regional-office@usda.gov

May 13, 2021

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide an Objection comment letter on the Pinkham Meadows Project. As you will read, we do not formally Object to the Project as proposed but believe it could be made better during implementation.

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 is not writing to submit a formal objection, since the objection period is open, but rather to voice our support for the Project and specifically for implementation of the Modified Proposed Action. AFRC submitted initial pre-scoping comments on August 8, 2017 and scoping comments on September 26, 2019. The Forest Service after receiving comments on the 2017 scoping package, and upon further analysis, field review and reconnaissance, decided not to carry this alternative further and it was modified into the Proposed Action as seen in the 2019 scoping document. The proposal has been further refined into the Proposed Action outlined in the Draft Decision. Many of our comments from the two previous letters we submitted remain valid, however, we will make specifics comments on issues that we now feel pertinent.

The project area is located South and West of Eureka, Montana along Pinkham Ridge. The project boundary encompasses 107,976 acres, of which 69,964 are National Forest System Lands (NFS) lands. The project area also includes 54,098 acres of NFS in the Wildland Urban Interface (WUI). The project area has provided forest products to the regional economy for many years. Timber harvest and prescribed fire are important tools for vegetation management in this area.

An additional issue that also needs to be considered is that this Project area lies within the Lincoln Shared Stewardship Project area. Many of our comments revolve around doing more forest management for the protection of the WUI areas and generating more timber volume.

AFRC supports the Purpose and Need for this project which includes:

- Promote resilient vegetation conditions by trending towards desired landscape-level vegetation patterns, structure, fuel loading, and species composition.
- Provide a safe and efficient transportation system for the public and administrative access that has minimal impacts on resources.

While we support the Purpose and Need we offer the following suggestions that we believe will make the project stronger.

1. AFRC earlier commented and still strongly believes that a third purpose and need for this project should be included and that would be **adding economic viability & support to the local infrastructure**. As you layout the Project and begin marking the units we encourage the Forest to understand that timber volume is important for our industry and supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service land. As the Forest Service surely knows, the "restoration" treatments that are desired on these public lands cannot be implemented without a heathy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed.

2. While AFRC supports the proposed action, we remain disappointed that of the 68,756 acres of General Forest available for management in the project area, the commercial treatments are only occurring on 7,311 acres or only about 11% of the Project area. The National Forests in Montana are very important for providing the raw materials that sawmills within the State need to operate. The timber products provided by the Forest Service are crucial to the health of our membership. 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. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

We strongly encourage the Kootenai National Forest to commercially treat at least 40% of the Project area in upcoming Projects. The Price of preparing NEPA and the length of time a Project area will be tied up in commercial and post timber sale restoration demands treating a good portion of the areas.

3. AFRC earlier voiced our concerned that with 54,098 acres within the WUI, the Forest isn't doing enough treatments to protect those lands from wildfire or insects and disease. Much of the southeast portion of the project area abuts private lands and it is in those areas especially near the community of Fortine that we are concerned about. We ask the Forest that where fuels reduction work is being done next to the WUI that thinnings be conducted to wide spacings leaving only 40 sq.ft. of basal area. Since not as many acres are being treated, more active management is needed on the acres that are treated.

4. AFRC appreciates the Forest looking at doing more regen harvest at 521 acres up from the initial 492 acres proposed in the 2017 scoping document. The modified proposed action includes regeneration harvest which would create three openings that exceed 40 acres. Patches developed by regeneration harvest would move toward naturally occurring opening size and patterns. AFRC supports creating openings larger than 40 acres and supports attaining approval by the Regional Forester (FSM 2471.1).

5. AFRC supports treatments within old growth stands in the drier habitat types in Douglas fir/ponderosa pine dominated stands to contribute to their stand resistance and resiliency. Approximately 1,281 acres of vegetation management treatments are proposed within old growth designated areas. This includes mechanical fuels treatments and prescribed burning proposed within old growth stands or portions of those stands.

6. This project will decommission all or portions of roads 15061, 15071, 15071A, 1042C, 15562, 15562A, 15562B, 15580B, 7281, 7281A, 7293H, 7959D, 7278 for a total of approximately 2.1 miles.

   AFRC believes that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to

attack nascent fires quickly and directly. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.

Second, we are concerned with the impacts to access that will result from such a vast level of decommissioning. An intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The road decommissioning proposed in the Pinkham Meadows Draft Decision likely represents a ***permanent*** removal of these roads and likely the deferral of management of those forest stands that they provide access to. The land base covered in the Redd Bull Project area are to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

We would like the District to carefully consider the following three factors when deciding to decommission any road in the project area:

- Determination of any potential resource risk related to a road segment.
- Determination of the access value provided by a road segment.
- Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

7. The project proposes approximately 2,837 acres of commercial thinning. AFRC suggests thinning trees using this method of silviculture to a wide spacing that will allow for wildfires to remain on the ground and not jump from crown to crown. Wider spacings will allow for the development of early seral vegetation species that are beneficial for various wildlife species. AFRC does not believe that the proposed 50% canopy removal is enough. The same logic applies to the 3,222 acres where the Forest will be doing "Improvement Cuttings" which are cuttings made in a stand past the sapling stage primarily to improve composition and quality by removing less desirable trees of any species. Again, AFRC recommends thinning to a wider space for forest health and fire reduction reasons.

8. As the Forest looks at what is needed to implement the work on the ground, we would like to remind the Kootenai that the primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Kootenai market area with a

variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as feller-bunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and feller-bunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Tethered-assist equipment is also becoming a more viable and available option for felling and yarding on steep slopes. This equipment has shown to contribute little additional ground disturbance when compared to traditional cable systems. Please prepare your NEPA analysis documents in a manner that will facilitate this type of equipment.

Finally, AFRC would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has a limited operating time at best, and further reductions such as these only makes surviving in the logging business that much more difficult.

9. AFRC believes that the use of Designation by Prescription might be a good option for designating the trees to be harvested and those to be left. Since the goal of the Project is to convert stands to more fire-resistant species such as western larch, western white pine, and ponderosa pine. Prescriptions can be written to accomplish this.

10. AFRC earlier complimented the Forest, and we still believe the Forest has done a good job of analyzing the impacts to Threatened and Endangered Species. The preliminary determination for the project *is may affect, is not likely to adversely affect grizzly bears.* The Forest Plan direction for motorized routes within the Tobacco BORZ was retained (FW-STDWL-02) and supplemented with a new desired condition to support habitat connectivity in areas between the primary conservation area (PCA) and the Salish demographic connectivity area (DCA). The
Pinkham Meadow Project would produce no changes that would result in an increase above the baseline conditions for open or total miles in these areas.

The preliminary determination for the project's effect on designated lynx critical habitat *is may affect, is not likely to adversely affect critical habitat*. The analysis indicates that this project may affect some areas of preferred snowshoe hare habitat but would retain denning and matrix habitat throughout the planning area.

11. AFRC did not mention the issues of climate change or carbon sequestration in our previous scoping comments, however, this issue is becoming more importanat and should have some documentation.

We would like to encourage the Rexford and Fortine Ranger District to consider several documents related to carbon sequestration and related forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

a. Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9– 18% when comparted to no harvest by the end of the simulation.
b. This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
c. Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. Ecosphere 7(1):e01224.10.1002/ecs2.1224

Key points of the Gray paper include:

a. Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
b. Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the sequestration of carbon from atmospheric CO2, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

Links to the above mentioned studies can be found at:

Lisa McCauley article on large scale forest restoration stabilizes carbon: https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/eap.1979

Andrew Gray article on Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity: https://www.fs.usda.gov/treesearch/pubs/52237

Thank you for the opportunity to provide comments during the Objection period of the Pinkham Meadow Project. Should this Project go to the Objection Resolution phase, AFRC would like to be part of those discussions and comment on issues we support and those we believe should be changed or modified with final implementation.

Sincerely,

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