



Via: <https://www.fs.usda.gov/project/?project=57302>

August 1, 2022

Bitterroot National Forest
Attn: Forest Plan Amendment
1801 N. 1st Street
Hamilton, MT 59840

Dear Amendment Planner:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Bitterroot Forest Plan Amendment Proposal.

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 Bitterroot 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 Bitterroot Forest has determined there is a need to amend Forest Plan components for old growth, coarse woody debris, and snags. The purpose of this Project is to receive feedback on these additional proposed changes to the 1987 Forest Plan, and to identify relevant scientific information and potential issues for the interdisciplinary team to consider.

AFRC agrees that the Forest needs to update these components of the Forest Plan and provides the following comments that we hope will aid in your planning.

Old Growth Component

AFRC recently commented on a Project Amendment regarding old growth on the Gold Butterfly Project. In that Project we supported the use of the Green et al. (2011) definition which we feel best fits the criteria for old growth found on the Bitterroot National Forest.

The current definition (based on Franklin et al. 1981) was the best information the Forest had for describing old growth characteristics when the plan was developed in the 1980s. However, this definition has several limitations. These criteria were developed for the Cascade Mountains Douglas-fir forest type, which is not representative of conditions, or the fire return intervals found on the Bitterroot NF. That definition includes:

- large trees, generally 15 per acre greater than 20 inches diameter at breast height (dbh) for species other than lodgepole pine and 6 inches DBH for lodgepole pine; canopy closure at 75 percent of site potential.
- Stand structure usually uneven-aged or multistoried.
- Snags, generally 1.5 per acre greater than 6 inches DBH and 0.5 per acre greater than 20 inches.
- More than 25 tons of per acre of downed material greater than 6 inches diameter.
- Heart rot and broken tops in large trees are common; and •mosses and lichens are present.

AFRC strongly supports using the Green et.al definition of old growth for the Bitterroot National Forest because it provides measurable criteria for designating old growth based on forest types and habitat types in Montana and Idaho including:

- Criteria for live trees: minimum age (by species) of large trees, number of trees (trees per acre) by diameter at breast height (equal to or greater than a given dbh level and age) and basal area.
- Associated characteristics such as pieces per acre of down woody material that is at least 9 inches in diameter on the large end, number of canopy layers, presence of trees with broken/missing tops, trees with decay, and number of snags greater than 9 inches diameter at breast height.

In summary, the amendment will allow for consistent and reliable project-level identification and a statistically valid Forestwide inventory of old growth acres by applying Green et al. (2011).

Coarse Woody Debris (CWD) Plan Components

AFRC supports changing the current Forest Plan definition of Coarse Woody Debris. Since the Forest Plan was developed, scientific information became available regarding the amount of coarse woody debris present in different habitat type groups (Fischer and Bradley 1987, Graham et al. 1994, Brown and Smith 2000). This information provides more refined measures to guide project implementation to contribute to achieving Forest Plan goals and objectives. Current management area direction for coarse woody debris retention does not recognize the differences in the natural variation of coarse woody debris among different forest and habitat types, as supported by the best available scientific information. Additional clarification is needed in Management Area 2 on the Forest because it has conflicting standards requiring both 10 to 15 tons/acre and 25 tons/acre to be left after harvest activities. Lastly, the tons/acre amounts of coarse woody debris prescribed in the 1987 Forest Plan exceed what current scientific information recommends is needed to maintain soil productivity and manage fuel loadings. These are two additional reasons necessitating an update.

Snag (Standing Dead Trees) Plan Components

The Forest has a major conflict on how it addresses the needed standing dead tree component in the current Forest Plan. On one hand it states that "All snags that do not present an unacceptable safety risk will be retained." A snag is defined in the Forest Plan as a standing dead tree usually greater than 5 feet in height and 6 inches dbh. The Forest Plan also permits the removal of dead or dying trees in salvage operations. The Forest Plan FEIS specifically discussed the concern of stand-replacing fires following mortality from insect epidemics and due to fire suppression.

With this in mind, AFRC strongly supports the need to resolve the contradictory direction providing sufficient snag habitat for wildlife while also allowing for the removal of excess snags where necessary to address fuel loading or to meet restoration objectives through sanitation treatments, salvage, and reforestation.

Thank you for the opportunity to provide scoping comments on the Bitterroot National Forest's efforts to amend Forest Plan components for old growth, coarse woody debris, and snags. We strongly support all three updates and want to stay engaged in this effort until it is implemented in the Forest Plan.

Sincerely,

A handwritten signature in blue ink that reads "Tom Partin". The signature is fluid and cursive, with the first name "Tom" and last name "Partin" clearly distinguishable.

Tom Partin
AFRC Consultant
921 SW Cheltenham Street
Portland, Oregon 97239