



VIA: <https://cara.fs2c.usda.gov/Public/CommentInput?project=64585>

November 6, 2023

Kootenai National Forest
Attn: Forest Plan Amendment
31374 US Highway 2
Libby, MT 59923-3022

Dear Amendment Planner:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide a letter of support for the Kootenai Forest Plan Amendment for Bears Outside of Recovery Zone which is in the Objection period.

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.

The Draft Decision Memo for the Kootenai Forest Plan Amendment for Bears Outside the Recovery Zone (BORZ) is currently in the objection phase. AFRC provided scoping comments to the Amendment on September 6, 2023. In our comments we stated that AFRC is supportive of the Forest adhering to the criteria for identification of BORZ areas provided by the interagency team of wildlife biologists. The scoping letter indicates that the Forest has followed these criteria by documenting “three or more credible observations within the last 15 years” within the Fisher BORZ. These observations were noted in the 2021 Ripley Environmental Analysis (EA) supported by a 2019 Monitoring Report. Further, we noted that AFRC supports this Forest wide BORZ addition as opposed to addressing bear observations through project specific analyses being planned in areas that are now not designated as BORZ.

We also support the addition of new BORZ areas because several Forest Service vegetation management projects have been subject to legal challenges in the last two years related to impacts on grizzly bears. The impact of these challenges has delayed implementation of the critical restoration and hazardous fuels reduction work on the Forest. These delays have also significantly diminished the timber outputs from the Forest that are critical for the survival of the local infrastructure. The Kootenai missed its timber target in FY'22 and in FY'23 was scheduled to sell about 80 mmbf, of which only 8 mmbf made it to market. These results are devastating to the sawmills that depend on the Kootenai for their sawlogs—and not sustainable. The Kootenai is in the center of the Montana wood basket and mills such as F.H. Stoltz, Weyerhaeuser, IFG, Stimson and Thompson River Lumber all depend on the Kootenai for their survival. Our members depend on a predictable and economical supply of timber products from Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present-day needs but also important for future needs. This future need for timber products hinges on the types of treatments implemented by the Forest Service today.

Further, studies in Montana have shown that 12-15 direct and indirect jobs are created for every one million board feet of timber harvested. 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.

Additionally, Montana's forest products industry is one of the largest components of manufacturing in the state and employs roughly 7,000 workers earning about \$300 million annually.

AFRC supports the work the Forest did to develop an accurate baseline assessment of the current road network. The Access Amendment related to standard FW-STD-WL-02 restricts permanent net increases in linear miles of total and open motorized routes above current levels. Therefore, it is critical that the Forest Service accurately identify the linear miles of motorized routes from which this standard will be measured against.

Further, we support the fact that the baseline miles have been adjusted to account for the existing miles of motorized route within the newly added acres. For example, the new baseline (standard) for the Cabinet Face BORZ would be the old baseline for the existing HUCs combined with the existing linear miles of motorized route within the newly added HUCs.

AFRC is very pleased to see that the Amendment clarifies when the “no net increase” of permanent roads does not apply. For example, when an area is being planned for treatment, there is almost always a need to construct temporary roads. **These temporary roads will not count as permanent roads since they will be closed once the work is completed. This point is very important when timber sales are being planned and temporary roads are needed.**

This amendment also clarifies when the “**no net increase**” of permanent linear miles in standard FW-STD-WL-02 **does not apply**:

- Motorized use by agency personnel or others authorized by the appropriate agency personnel (i.e., there is no limit on the administrative use on restricted roads within BORZ).
- Updated/improved road data without an actual change on the ground (i.e., database corrections).
- Exchanging, acquiring, buying, or selling lands by the agency.
- Motorized use for emergency situations as defined by 36 CFR § 215.2 Temporary Road

It is very important to note that bear populations are growing and occupancy is expanding in these areas proposed for BORZ addition. This indicates some level of tolerance of existing levels of motorized access within these watersheds, thus indicating those impacts are not significant. However, limiting the amount of motorized access to existing levels provides areas on the Forest where bears can utilize habitat outside of the recovery zones within that tolerance. The BORZ are still areas with more wheeled motorized access and more disturbance and mortality risk than management direction allows within the recovery zone. Also, there will be an overall benefit to bears by placing a limit on the increase in linear miles of roads that can occur in areas where recurring use is documented. AFRC agrees with the conclusion in the Draft Decision Memo stating that *“There will be an overall benefit to bears by placing a limit on the increase in linear miles of roads that can occur in areas where recurring use is documented and that this effect is not significant.”*

The Forest acknowledges that illegal use of roads has occurred, but that 77 percent of the closure device surveyed in Bear Year 2021 in the newly added BORZ areas found no evidence of illegal use. Breaches are repaired after they are discovered, preferably during the same Bear Year. Ultimately, the designation of this BORZ area does not impact the level of illegal road use. Again, it’s important to note that even with 23 percent of motorized routes having some illegal use—grizzly bear use has still increased.

While AFRC believed the Forest was correct in seeking approval to waive the objection period under the Western Firesheds Emergency Action Determination per section 40807 of the 2022 Bipartisan Infrastructure Law—the Forest did choose to go forward with an objection period. AFRC now asks if there are objections that the Forest prioritize and expedite the resolution process. As mentioned above, the implementation of several delayed projects is contingent on this BORZ designation. Furthermore, portions of the Fisher BORZ area overlap one of the 250-acre high-risk Firesheds identified by the Forest Service. These Firesheds were identified as being at high risk of damaging wildfire in the absence of hazardous fuels reduction treatments. The Forest Service has prioritized such treatments in their Wildfire Crisis Strategy and has repeatedly identified a need to expedite those treatments through NEPA efficiencies. A letter dated July 19, 2023, from the Chief directed Regional Foresters to utilize emergency authorities as the **“default way of conducting environmental reviews”** within these Firesheds. This direction clearly applies to this Plan Amendment. In addition, several new projects are being planned in the new BORZ designated areas that rely on this Amendment.

AFRC appreciates your explanation regarding our concerns about the forest plan amendments effects to forest management and timber harvest. The Forest stated, *"I recognize that the no net increase in roads will limit the construction of additional permanent roads but believe that the provisions for temporary increases to linear miles and flexibility to close roads and open others for management, will allow for vegetation management for fuels reduction and forest health purposes."* AFRC believes this flexibility should allow the level of forest management needed for restoration work on the Forest, particularly in the Wildland Urban Interface and Community Wildfire Protection Plan areas.

AFRC supports the Forest's position that linear miles of roads is the metric to use for habitat evaluation and effectiveness for grizzly bears. While there are different metrics used within the recovery zone and the BORZ areas, such as density of roads, the Region 1 Consultation Technical Team, continues to recommend that linear miles of motorized route be used as a recommended metric for analyzing grizzly bear habitat outside of a recovery zone which we support as well.

Thank you for the opportunity to provide a letter of support for the Kootenai Forest Plan Amendment for Bears Outside the Recovery Zone Project (BORZ Amendment). Should there be other Objections and a Resolution meeting is needed, AFRC would prefer to have a meeting with all objectors at the same time.

We look forward to this Amendment being implemented quickly.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

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