VIA Link: https://www.fs.usda.gov/project/kootenai/?project=64765

January 8, 2024

Michael Feiger, District Ranger
Cabinet Ranger District
2693 Highway 200
Trout Creek, Montana,59874

Dear Michael:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Tuscor 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 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 2,733-acre Tuscor Project is located in the Tuscor Creek drainage near Trout Creek, Montana. The entire Project lies within the Wildland Urban Interface identified in the Sanders County Community Wildfire Protection Plan. The project area is within a designated area in accordance with section 602(b) and (c) of the Healthy Forests Restoration Act (HFRA). HFRA describes lands designated by this authority as experiencing declining forest health and at risk of experiencing substantially increased tree mortality over the next 15 years due to insect or disease infestation. This Project is being designed to reduce the risk or extent of, or increase the resilience to, insect or disease and infestation, or to reduce hazardous fuels in the designated areas.

This Project can be categorically excluded from documentation in an EA or EIS because it fits the following category Insect and Disease Infestation. Section 603 of HFRA (16 U.S.C.6591b)

(FSH 1909.15, 32.3(5)) (DM Required). An insect and disease or hazardous fuels project that may be carried out under this authority is a project that is designed to reduce the risk or extent of, or increase the resilience to, insect or disease infestation, or to reduce hazardous fuels in the areas (HFRA, Sections 602(d) and 603(a)).

AFRC supports this Project and the Purpose and Need which includes:

- Build resistance and resilience to natural and man-caused disturbance through diversification of species composition, structure, successional stages, and tree densities.
- Reduce the risk of wildfire to nearby communities and infrastructure.
- Contribute to the sustainable supply of timber products from National Forest System (NFS) lands.

The Proposed action is listed below.

Table 1. Summary of the Proposed Action

Description	Area (acres)	Percentage (%) of Project Area
Project Area	**2,733**	**100.0**
Total Proposed Treatments	**1,394**	**51.0**
Commercial Harvest (Regeneration/Intermediate)	753 (563/190)	27.5 (20.6/6.9)
Seed Tree with Leave	*315*	*11.5*
Clear Cut with Leave	*249*	*9.1*
Improvement Cut	*159*	*5.8*
Commercial Thin	*30*	*1.1*
Non-commercial Harvest	641	23.5
Fuel Break	*574*	*21.0*
Pre-commercial Thin	*68*	*2.5*

While AFRC supports the Purpose and Need and the Proposed Action we offer the following comments that we hope will strengthen and complement your planning document.

1. AFRC supports the District using the HFRA categorical exclusion (CE) to treat this Project area. It meets all of the criteria including covering 3,000 acres or less. The condition of the stands dictates the need for treatment with all of the insects and diseases present along with the heavy fuel loading. Finally, this Project area falls within one of the areas outlined in Montana's Forest Action Plan.

2. AFRC is very pleased to see that contributing to the sustainable supply of timber is part of your purpose and need for this Project. The timber program on the Kootenai has been in dire straights during the past two years and we desperately need this Project planned and implemented quickly. The mills that depend on the Kootenai are getting short in operational volume.

   Further, 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. There are several sawmills, post and pole, and smaller wood operations

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. Studies from the University of Montana's Bureau of Business and Economic Research has shown that for every million board feet of timber harvested there are 15-18 direct or indirect jobs created.

3. The harvest plan calls for 179 acres to be logged by tractor and 574 acres to be skyline logged. Hopefully this will not cause the Project to be uneconomically to operate. With that in mind AFRC would like to remind the Forest that the benefits of conducting a project 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.

   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 CE'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 Montana market area with a variety of skills and equipment. Developing a CE 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 use of their equipment. To address this issue, we would like to see flexibility in the CE 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 fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers 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 safe, viable, and available option for felling and yarding on steep slopes. This equipment has been 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.

4. The scoping document outlined the problem with root diseases in the area. There is a need to limit damage occurring from root diseases and other pathogens through tree species conversion to those species more resilient to such diseases. The Forest Plan seeks to trend plant communities towards the desired conditions for composition. Because of the large areas impacted by root rot and the need to convert to more resilient species AFRC supports the Forest requesting Regional Forester approval prior to implementation to provide rationale for the proposed timber harvest.

5. The District is planning on implementing several fuel breaks in the Project area. The ones being planned do not include commercial material. Recently several other Forests have planned some shaded fuel breaks along key roads that provide ingress and egress to WUI areas. The fuel breaks will harvest trees of all sizes. AFRC supports the concept of shaded fuel breaks along strategic roads within the project area. These fuel breaks should be wide enough to stop or slow down a fast-moving wildfire. At a minimum, these breaks should be 300 feet wide on either side of those roads. The stands within those fuel breaks should be thinned to a wide spacing and low basal area to reduce the threat of a crown fire going through the area. The purpose of the fuel breaks is to get the fire to lay down on the ground for suppression purposes. We would like the District to consider shaded fuel breaks in the Tuscor Project for the reasons listed above.

6. Improvement cuts and commercial thinnings are scheduled to be used in several units. We encourage the District to thin these areas to wide spacings leaving 40 sq.ft. of basal area. This will accomplish several goals including reducing heavy fuel loadings, addressing insect and disease problems, and increase the vigor on the residual trees.

   AFRC was disappointed to read that riparian areas within the project area were excluded from proposed treatments to minimize potential impacts. AFRC believes that managing in the greater riparian areas can help to achieve forest restoration goals. It has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. There is a need for treatments that meet the need of multiple habitat types, and we encourage the District to look for ways to incorporate treatments that meet those needs. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full

range of objectives that the Project mandates should be considered.

The tradeoffs that the Forest Service will likely be considering through the ensuing environmental analysis will be between achieving these forest health benefits and potentially having adverse impacts to streams. These impacts to streams typically include stream temperature, wood recruitment, and sedimentation associated with active management. We would like the Forest Service to review the literature cited below and incorporate its findings into your environmental analysis that will shape the level of management permitted to occur in riparian reserves.

Stream temperature

Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management*, 270, 302-313.

Key points of the Janisch paper include:

- The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature.
- Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.

Anderson P.D., Larson D.J., Chan, S.S. 2007 Riparian Buffer and Density Management Influences on Microclimate of Young Headwater Forests of Western Oregon. *Forest Science*, 53(2):254-269.

Key points of the Anderson paper include:

- With no-harvest buffers of 15 meters (49 feet), maximum air temperature above stream centers was less than one-degree Celsius greater than for unthinned stands.

Riparian reserve gaps

Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old-growth versus early-mature riparian forests in western Oregon. *Aquatic Sciences* 75:547-558.

Key points of the Warren paper include:

- Canopy gaps were particularly important in creating variable light within and between reaches.
- Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests.

Wood Recruitment

Burton, Julia I., Olson, Deanna H., and Puettmann, Klaus J. 2016. Effects of riparian buffer width on wood loading in headwater streams after repeated forest thinning. *Forest Ecology and Management*. 372 (2016) 247-257.

Key points of the Burton paper include:

- Wood volume in early stages of decay was higher in stream reaches with a narrow 6-meter buffer than in stream reaches with larger 15- and 70-meter buffers and in unthinned reference units.
- 82% of sourced wood in early stages of decay originated from within 15 meters of streams.

Sedimentation

Rashin, E., C. Clishe, A. Loch and J. Bell. 2006. Effectiveness of timber harvest practices for controlling sediment related water quality impacts. *Journal of the American Water Resources Association*. Paper No. 01162

Key points of the Rashin paper include:

- Vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment.

Collectively, we believe that this literature suggests that there exists a declining rate of returns for "protective" measures such as no-cut buffers beyond 30-40 feet. Resource values such as thermal regulation and coarse wood recruitment begin to diminish in scale as no-cut buffers become much larger. We believe that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood recruitment, based on this scientific literature. We urge the Forest Service to establish no-cut buffers along streams no larger than 40 feet and maximize forest health outcomes beyond this buffer.

In addition to the benefits of managing in the riparian areas listed above, AFRC believes that this Project will have beneficial impacts to fisheries resources as indicated in the scoping document. Culverts need to be replaced to help with fish passage, thinning is needed to increase water yield, and density reduction is needed to mitigate wildfire risk that will lessen the chances for mass soil movements into streams following fires.

Thank you for the opportunity to provide scoping comments on the Tuscor Project. We look forward to following the progress of this project as it moves forward through implementation.

Sincerely,

Tom Partin
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