



VIA Link: <https://www.fs.usda.gov/r01/kootenai/projects/31645>

May 29, 2026

Michael D. Feiger, District Ranger
Cabinet Ranger District
2693 Montana 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 provide Draft Supplemental Environmental Impact Statement (SEIS) comments on the Pilgrim Creek Timber Sale Project.

AFRC is a regional trade association whose purpose is to advocate for sustained timber yield 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 Pilgrim Creek Timber Sale project area is located west and southwest of Noxon in Sanders County, Montana, and encompasses an area of approximately 36,602 acres, of which approximately 29,987 acres are National Forest System lands. The project originally proposed intermediate harvest of 824 acres, and regeneration harvest of 587 acres. Where root disease is present at higher levels, root disease resistant species (such as western larch, western white pine, or ponderosa pine) have been favored in the residual stand or planted with these species after harvest. Additionally, 2.4 miles of new, permanent road and approximately 1.6 miles of temporary road were constructed.

On October 3, 2019, the District of Court Montana issued an unfavorable ruling in the Pilgrim II litigation and ordered the Forest Service and Fish and Wildlife Service to reinstate consultation for the Kootenai Forest Plan Access Amendments and the Pilgrim Project. Additionally, the Forest Service was instructed to prepare a Supplemental Environmental Impact Statement (EIS) for the Pilgrim Project. The Court found that the analysis included in the EIS and the consultation were based on flawed assumptions regarding the effectiveness of barriers on closed roads within the Clark Fork and Tobacco Bears Outside Recovery Zone (BORZ) units. The proposed action is to prepare a Supplemental Environmental Impact Statement that updates assumptions related to closed road barrier effectiveness in alignment with the monitoring data that has been reported and incorporate results of the consultation with Fish and Wildlife Service.

While a good portion of the project was implemented, the following work remains in the Pilgrim Creek timber Project area:

- Timber harvest – 11 Units (approximately 219 acres)
- Prescribed Burning – 19 Burn Units (approximately 4,564 acres)
- Planting – 370 acres
- Road Storage after Project Implementation (stabilize/berm install) - 1 gate removal; 2 berms installed on 2 roads; Approximately 4.7 mile

In the original Pilgrim EIS, Alternative 3 was a modification of the proposed action and the preferred (and chosen) alternative. It places more emphasis on salvage of lodgepole pine resulting in an increased level of regeneration harvest and the creation of more openings larger than 40 acres. This alternative required a Forest Plan amendment to exceed open road density on big game summer range and approval to create seven openings greater than 40 acres in size totaling 1,002 acres. **Based upon the updated BORZ consultation, which AFRC provided comments on, the responsible official will decide whether Alternative 3 can continue to be implemented in this SEIS.**

AFRC continues to support the original Need for the Project which includes:

- A need for silvicultural treatments to reduce stand densities, improve growing conditions, and increase the proportion of root disease-resistant tree species in the area.
- A need to increase age class diversity in lodgepole pine dominated forest communities in the project area.
- A need to provide local employment related to forest management and restoration activities and to supply forest products to contribute to the support of that segment of the local and regional economy dependent on timber products.
- A need to improve forage production and quality using such treatments as commercial timber harvest, slashing, and prescribed fire.

AFRC is very pleased to see that the District has identified a need to provide local employment related to forest management and restoration activities and supply forest products to contribute to the support the local and regional economy that is dependent on timber products. AFRC believes that providing raw materials to the local infrastructure should be one of the purposes because forest health treatments can't be accomplished without a healthy and robust sawmilling infrastructure. In the past few years, we have lost sawmills in Townsend, Seeley Lake, and a

panel facility in Missoula. The Forest should be aware of these losses and strive to keep the existing facilities intact.

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. Specifically, 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. 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 way these products are permitted to be delivered from the forest to the mills.

Additionally, Montana's forest products industry is one of the largest components of manufacturing in the state with approximately 7,000 employees earning about \$300 million annually. Much of the industry is centered in western Montana, and this Project is crucial to the infrastructure located in and around the Kootenai National Forest. Commercial treatments across 219 acres will help to keep this infrastructure viable.

Further, AFRC members depend on a predictable and economical supply of timber products off 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. Of importance is how those treatments affect the long-term sustainability of the timber resources on Forest Service managed land. Not managing the maximum number of acres today will impact the ability to produce the timber needed in the future.

AFRC supports the analysis which examined the impacts of implementing the original Alternative 3 on several listed species.

Grizzly Bear

The grizzly bear and its habitat are expected to occur in the action area, which is in the Clark Fork BORZ and Marten grizzly bear analysis unit (GBAU). The Clark Fork BORZ and Marten GBAU both have low levels of secure habitat and a high density of motorized routes. Motorized access to complete the remaining activities **would not have** temporary impacts to access management conditions. The project would not lead to population-level effects and is consistent with managing grizzly bears to a non-listed status.

It is also AFRC's opinion that the District did a good job of quantitative analysis on the breaches that have occurred on roads in the project area that have closure devices. *"Closure device monitoring completed in the Clark Fork BORZ during the 2024 bear year identified three breached closure devices, including two barriers and one gate (Table 7). A berm was added to the side of the gate to prevent further breaches by public motorized users in this location. Since gated roads are already buffered for secure habitat calculations, the illegal use of this road did not impact secure habitat. The two barriers that were reported as breached are*

currently being used for implementation of the Purple Marten Project and will be closed following project use. These two roads are treated as open routes for access management calculations.”

Table 7: Results of 2024 ad hoc monitoring of Clark Fork BORZ closure devices on existing routes.

Closure Device	Monitored	Breach Detected	Repaired
Barrier	85	2*	0
Gate	31	1	2
No Device	1	0	0

*These identified breaches are not actual breaches the barriers were removed as authorized by the Purple Martin project decision and will be closed following the Purple Martin project completion.

Yellow-billed Cuckoo

The yellow-billed cuckoo is not known to occur in or near the project area and no suitable breeding habitat would be impacted by proposed activities. There would be no effect to this species from the proposed activities.

Wolverine

The Pilgrim project vicinity lacks adequate maternal and primary habitat to expect resident wolverine. This block of NFS lands is mainly in dispersal habitat and it is unlikely that a female wolverine would establish a home range in this area.

Whitebark Pine

Surveys completed in the project area for whitebark pine found 3 individuals along the southwest boundary of the project area, but none were documented within proposed units. However, there is potential for individuals to be present that were not detected through surveys. If individuals are found, protection measures listed in the project design features section would protect whitebark pine individuals if any are found within units. Based on this information it is believed that this project would not contribute to any negative cumulative effects to whitebark pine.

In conclusion, AFRC supports The Kootenai National Forest completing the remaining activities in the Pilgrim Creek timber sale previously authorized under Alternative 3, in the May 2013 Record of Decision.

Thank you for the opportunity to provide Draft Supplemental Environmental Impact Statement comments on the Pilgrim Creek Timber Sale Project.

Sincerely,



Tom Partin
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