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First name: Ed

Last name: Levert

Organization: Kootenai Forest Stakeholders Collaborative

Title:

Comments: January 13, 2025
Re: Pine Phlats Project Comments
Dear Nate,
The Kootenai Forest Stakeholders Collaborative (KFSC) is a collaborative group which partners with staff on the Kootenai National Forest (KNF) to achieve success on numerous projects both in and around federal lands on the KNF. We are a diverse group of individuals which continue to work out differences on these projects in an attempt to achieve consensus on the out-comes on these projects. Our members represent conservation groups, local and regional elected officials, recreation groups, timber interests and representatives of the general public. We truly appreciate the opportunity to offer scoping comments on the Pine Phlats Fuels Reduction Project. We very much support the use of a Categorical Exclusion under Section 603 of the Healthy Forest Restoration Act (HFRA). We appreciate that the agency is proposing management activities in fire-sheds adjacent to the community of Libby. These lands are intermingled with private timberlands, industrial timberlands, Montana State timberland and residential homes just north of Libby. We appreciate that the agency realizes the necessity of vegetative treatment on its lands to mitigate fire potential and hopefully is practicing cross boundary coordination with their adjacent property owners. We understand the need for improvement of forest resiliency within those stands in need of thinning (both precommercial and commercial) of overstocked stands. Improvement cuts are certainly warranted where insects and disease are endangering forest health. We also realize the need for both commercial and non-commercial treatments as different stands warrant different treatments. Group selections are a great way to help diversity the age class, species diversity and size distribution in many of these 90 year old ponderosa pine plantations. We support the need to treat and reduce fuels by shifting species composition, size class and stand densities towards the KNF forest plan's desired conditions. We understand that the above objectives will be met with a myriad of differing prescriptions including, but not limited to: intermediate harvest, improvement & regeneration harvest, pre-commercial and commercial thinning, mechanical fuels and activity fuels treatment and disposal. We trust that the agency will undertake all these management decisions with the utmost concern for water quality, wildlife and habitat needs and concerns, noxious weed spread and access for public as well as recreational concerns. We do have some silvicultural suggestions to consider during the planning stages of this project: Past fuel reduction projects such as the Kootenai River North project have resulted in new Douglas fir seedling establishment that within the next 10-20 years is going to become a understory fire hazard. These fuels hopefully will be treated as a part of this project. We suggest the use of group openings larger than 2-3 acres and designed when possible to be oriented where they might be effective fire breaks. In order to create species diversity in these even age stands of ponderosa pine you will have an opportunity to create stands with more of a western larch component. In existing stands where group selections are planned we recommend the leave component also be treated, unless it is a key wildlife component. Many wildlife islands were left intact during the last harvest and now because of overstocking are showing mortality. These areas would be good candidates for creating openings. Concerns specific to this project include improvement of ingress and egress by removing flammable vegetation providing for fire fighter safety along major travel routes in the project area. This not only will help protect fire-fighters but also the public in their evacuation needs should they arise. It is unfortunate that the north boundary of the project along the Bobtail Cutoff Road does not include fuel reduction on both sides of the road. This is certainly a major evacuation route and possibly an important control point in the event of a wildfire. Hopefully this area can be treated in the near future. We'd like to note that KFSC members represent a VERY broad base of individuals concerned with the management direction of the Kootenai National Forest. Our members include local elected officials, members of conservation groups, timber and lumber manufacturers, former U.S. Forest Service line officers, various recreational user groups and local business owners. Our group has a long history of working with present and former KNF staff and our goal is to see the forest succeed with projects that enhance the forest's future while protecting concerns that are in the present. As such, we support the Pine Phlats Fuels Reduction Project and appreciate the opportunity to submit scoping comments. Ed Levert and Wayne Maahs