



VIA Email: FS-comments-northern-idpanhandle-sandpoint@usda.gov

January 24, 2020

Michelle Norton
Sandpoint Ranger Station
1602 Ontario Street
Sandpoint, Idaho 838964-9509

Dear Michelle:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Buckskin Saddle Project Draft EA.

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 Idaho Panhandle 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 Buckskin Saddle project is located about 2 miles southwest of Clark Fork, Idaho. The project area encompasses approximately 50,600 acres which includes Granite Creek, Johnson Creek, and other small tributaries to the lower Clark Fork River and Lake Pend Oreille. Most of the area is located on the Sandpoint Ranger District in Bonner County, Idaho. However, a small portion of the area (approximately 1% or 500 acres) is located on the Coeur d' Alene River Ranger District in Shoshone County, Idaho. The project area is situated on the eastside of Lake Pend Oreille and to the south of the Clark Fork River. The focus of this project is to make the stands within the project area more resilient to disturbances such as drought, insects, disease, and wildfire. The north and west of this project area is also within the Wildland Urban Interface. These areas contain decadent stand conditions with excessively high fuels build up.

AFRC submitted pre-scoping comments on April 3, 2019 and formal scoping comments on September 3, 2019.

The Buckskin Saddle project proposes to increase the resilience of the forests in the project area to insects, diseases, droughts and the undesirable effects from wildfires. Especially important to local citizens is the reduction of hazardous fuels near private land, access - egress routes, and powerlines. The existing conditions in the Project area are not desirable because they do not meet the 2015 Land Management (Forest Plan) goals and objectives. There has been limited fire on the project landscape and the last large fire events were in 1894, 1910, and 1926. This has led to a very large buildup of fuels setting the stage for catastrophic wildfires and/or insect and disease attacks.

The Project objectives have remained the same from scoping to the Draft EA. AFRC supports Alternative 2 which includes the following objectives:

- Improve the resiliency and resistance of the forest vegetation to disturbances such as wildfire, drought, insects and diseases.
- Decrease the quantity and modify the arrangement of hazardous fuels to create a lower intensity and lower severity fire environment.
- Contribute to local economies through the production of timber products.
- Reduce sediment delivery to streams from the forest road and trail networks and restore aquatic organism passages to improve aquatic resources.
- Improve the dry site stand conditions for flammulated owl habitat and increase the amount of browse for elk.
- Improve the scenic quality as seen from Lake Pend Oreille, the town of Clark Fork, and other important viewing locations identified in the Forest Plan.
- Maintain and improve trails and trailheads for multiple user groups.
- Improve existing system roads to provide for safe and efficient travel, develop rock pit/quarries to provide material for road graveling and rip rap for road stabilization, and increase road access where needed for vegetation management.

AFRC member companies have participated in the collaborative group that has supported this project. While our members are interested in the timber products that will come from this project, we also know how important it is to improve and develop other resources found in the project area and to reduce fuels to protect lives and structures since 57 percent of the project area occurs in the Wildland Urban Interface (WUI). Much of this resource improvement work will come from the revenues derived from the stumpage of timber sold. With this in mind, AFRC offers the below suggestions that we feel will support or improve the Buckskin Saddle Project.

1. AFRC is pleased to see that the Forest is commercially treating 13,400 acres out of the total 50,600 acre project area or 26% of the land. This is up slightly from the acreage outlined in the scoping document. Harvesting this larger land base is important because 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 needs in the future. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments effect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times regarding the long-term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. While the treatments on the Buckskin Saddle Project will help to address this long-term sustainability concern, they will likely provide short-term products for the local industry and we want to ensure that this provision is an important consideration for the decision maker as the project progresses.

2. AFRC always encourages the Forest Service to treat as many acres as practical when preparing an EA or EIS, and as we mentioned above, we believe the Sandpoint District has done a good job in that respect. The expense of these planning documents is high and we feel it is important to get as much work done using this document. Treating more acres also adds to the timber volume that will be produced. The National Forests in Idaho are very important for providing the raw materials that sawmills within the State need to operate. 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 Idaho have shown that 20 direct and indirect jobs are created for every one million board feet of timber harvested. That information is listed below.

In Table 16 the findings from these reports are listed. The expected economic effects of timber harvest are quantified by the amount of employment or revenue that results from every 1 million board feet (MMBF) of timber harvested.

Table 16. Economic Return Per MMBF of Timber Harvested.

Economic Return	Jobs per million board feet (MMBF)
FPI Jobs Created or Sustained	20 jobs per 1.0 MMBF
Revenue to Communities Through Wages and Salaries	\$667,000 per 1.0 MMBF
Revenue to Communities Through Sales of Goods and Services	\$3,850,000 per 1.0 MMBF

Source: Cook, et al. "Idaho's Forest Products Industry Current Conditions and 2016 Forecast."

3. The table below outlines the logging systems that will be used on this project and the approximate acres treated by each method:

Table 2. Logging systems

Equipment	Acres
Ground Based	4,425
Skyline / Swing	30
Skyline yarding	7,998
Helicopter yarding	947

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 EA'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 Sandpoint market area with a variety of skills and equipment. Developing an EA 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 and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA 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 viable and available option for felling and yarding on steep slopes. This equipment has 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. Finally, helicopter logging can be not only uneconomical, but also difficult to find an operator within a given timeframe or contract length. AFRC asks the Forest to allow for great flexibility in getting these 947 acres logged, or perhaps making these units optional.

4. Much of the needed work to be done is in the WUI. AFRC recommends that areas adjacent to the WUI's be thinned heavily to reduce fuel loading and to increase residual tree growth and vigor. AFRC recommends thinning in these areas to 40 sq.ft of basal area per acre to get needed spacing.
5. The Forest is proposing to manage various Forest Service Roads to accomplish management objectives. Most of the roads in the project area have not received any maintenance for over a decade. Some of the roads are currently open and drivable while other roads are closed with a barrier and are often undrivable because of thick brush and small trees growing in the road prism. The schedule of work is listed below:

Table 4. Road Management Activities.

Road Management Activities	Closed	Open	Total Proposed Miles
Total Miles Road Maintenance	64.9	107.6	172.6
Total Miles Road Reconstruction	0	.2	0.28
Total Miles of New System Road Construction	30.4	.5	30.9
Total Miles Road Storage	98.2	3.5	101.7
Total Miles Road Decommissioning	9.3	.27	9.63
Total Miles Temporary Road	N/A	N/A	0.39

AFRC is concerned about the possible high costs for Road Management activities. Those will include realignment, road widening, the addition of turnouts and improvement and/or addition of drainage structures. The planned work also 9.3 miles of road decommissioning and expanding four gravel pits and constructing up to six new pits. AFRC encourages the Forest to be cognizant of the cost of road work and road storage and not to overload the project with these expenses. An intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The road decommissioning proposed in the Buckskin Saddle scoping notice likely represents a **permanent** removal of these roads and likely the deferral of management of those forest stands that they provide access to. The land base covered in this Project area are to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

We would like the District to carefully consider the following three factors when making a decision to decommission any road in the project area:

- Determination of any potential resource risk related to a road segment
- Determination of the access value provided by a road segment
- Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.

Another factor contributing to timber sale economic viability is rock source for required and/or optional road work. Costs associated with hauling rock long distances has been escalating in recent years and often represents a significant cost in timber sale implementation for our members. In fact, this spike in cost has recently been identified by several purchasers as a primary contributor to sales going no-bid. Quarry development (new or existing) on in close proximity to the Buckskin Saddle project should be considered if available. The value of having a good rock source close to future timber sales should be strongly considered by the Sandpoint District.

6. AFRC strongly supports the proposed regeneration treatments in the timber harvest units. There is a need to regenerate portions or all the stands of essentially pure Douglas-fir, grand fir, hemlock, and lodgepole due to the prevalence of root disease. It is our experience that an intermediate harvest would exacerbate root disease effects (through buildup in the stumps and root systems of the pathogens that cause root disease), lead to heavy blowdown, and encourage advanced regeneration of grand fir and Douglas-fir. Regeneration harvest is also an integral component of a vegetation management program that strives to ensure a sustainable supply of timber products.

AFRC also supports the Forest's findings that there is a need to increase the size and scale of treatment areas to better match the size and scale of the insect and disease present within these stands. This would result in openings larger than 40 acres in many of the proposed harvest units. AFRC would support a forest plan amendment requesting the use of openings larger than 40 acres.

These larger openings will also help to trend this area towards the vegetative desired conditions providing a mosaic of age classes. Hardwood, shrub, and grass species are important sources of high-quality forage for deer and elk as they prepare for winter, over winter, and in the spring as they begin to replenish lost body mass from the previous winter. This proposal would retain and enhance aspen and provide valuable forage by reinvigorating existing shrub and grass communities making them more palatable and nutritious for big game species and other terrestrial wildlife. The Flammulated owl also needs more open ponderosa pine stands and thinnings to wide spacings is needed for this species.

7. AFRC would support unit designs which would mitigate some of the unnatural appearing edges and straight lines caused by powerline rights of way or other past harvest units. These areas are visible from Lake Pend Oreille, the town of Clark Fork and other areas that are important viewing positions. New units could better blend open areas into the landscape for better visuals.
8. AFRC supports the removal of coniferous species in stands of aspen and other hardwood species. Aspen stands have disappeared or greatly diminished across the Buckskin Saddle landscape and removing the overstory conifers is the best way to regenerate these stands.
9. Another project objective is to decrease sediment sources to maintain or improve water quality and aquatic habitat as well as improving forest health. AFRC believes that managing in the riparian areas can help to achieve these 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. The ACS describes the need for treatments that meet the need of multiple habitat types and we encourage the Sandpoint 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 ACS 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.

10. AFRC believes that DXP could be an effective tool in this project. The current species composition is dominated by grand fir, Douglas-fir, western hemlock and lodgepole pine. A desired condition for the IPNF Forest Plan is to have more forest dominated by western white pine, ponderosa pine, and western larch. This change in stand composition does not reflect the desired condition of the forest and has made these stands more susceptible to disease and disease related mortality. AFRC believes a DXP prescription could be used over a large part of the treatment area to achieve the desired species composition and be a cheaper method for designating harvest trees.
11. AFRC would like to reference a study that was completed in 2018 that looked at the relationship of forest structure to quality of elk forage. Much of the data from this study came from the Bitterroot National Forest and surrounding areas, **“Evaluating & Informing Elk Habitat Management”** by DeVoe et.al. In that document it states *“Forage abundance and forage quality may also be enhanced through timber harvest treatments that reduce overstory canopy cover. We suggest that focusing management treatments on public lands and in forest vegetation types that are common within a region but with lower nutritional value may be one tool available to attract more elk onto public lands during the summer and reducing the redistribution of elk to private lands prior to and during the fall hunting seasons. Managers could also consider forest treatments in areas identified as important seasonal travel corridors for elk. Combining forest treatments with other strategies, such as reducing availability of high quality nutritional resources on private lands to elk, increasing hunter access on private lands, or altering harvest regulations to more evenly distribute harvest risk across public and private lands, may provide a more holistic approach to encouraging elk to remain on public lands.*

Much of the DeVoe study compares the effects of no disturbance, wildfire and prescribed burns and silvicultural treatments. One significant finding outlined includes *“Across disturbance types, the highest predicted TIN (Nutritional Value) values that were significantly different from the undisturbed class occurred in areas thinned ≥ 21 years prior (7.5% greater), followed by areas clearcut ≥ 21 years prior (6.7% greater) and areas thinned 1120 years (5.5% greater) prior.*

Other takeaways from the study include:

- Distribution and availability of high quality nutrition provided by landscape disturbances—including prescribed fire, forest thinning and openings—strongly influenced elk distribution.
- Forage abundance and quality may be enhanced through timber harvest treatments to attract more elk onto public lands.

12. We would like to encourage the Sandpoint District to consider several documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large- scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when compared to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. *Ecosphere* 7(1):e01224.10.1002/ecs2.1224

Key points of the Gray paper include:

- Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the

sequestration of carbon from atmospheric CO₂, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

Thank you for the opportunity to provide comments on the Buckskin Saddle Project Draft EA. The Forest has done a good job of planning restoration needs for many of the resources in the area. I look forward to following the implementation of this project as it moves forward.

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
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