



VIA Email: objections-pnw-colville@usda.gov

July 6, 2020

Rodney Smoldon
Objection Reviewing Officer
765 S. Main Street
Colville, WA 99114

RE: Sanpoil Objection

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed draft decision for the Sanpoil Project. Republic District Ranger Travis Fletcher is the responsible official. The Sanpoil project occurs on the Republic Ranger District on the Colville National Forest.

Objector

American Forest Resource Council
700 NE Multnomah, Suite 320
Portland, Oregon 97232
(503) 222-9505

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC represents over 50 forest product businesses and forest landowners. AFRC's mission 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. The Sanpoil project will, if properly implemented, benefit AFRC's members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

Objector's Designated Representative:
Tom Partin, AFRC Consultant

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Reasons for the Objection

The content of this objection below is based upon the prior specific written comments submitted by AFRC. Specifically AFRC provided scoping comments for the Sanpoil Project on January 20, 2017 and Draft EA comments on February 26, 2019 which are hereby incorporated by reference.

1. Alternative 2 did not meet the objectives of the Project to their fullest extent. The Purpose and Need of the Project as it appears in the Final EA includes:

- To promote forest health and resiliency within the project area to foster conditions that are less prone to disturbance events including insects, disease, and wildfire.
- Improve or maintain water quality, watershed functions, and aquatic habitat in the Sanpoil Project Area.
- Provide forest products that are economically viable and sustainable to support infrastructure and jobs in the Tri-County area.

In AFRC's opinion, the goal of any Forest Service vegetation management project should be to meet the stated project objectives to the maximum extent across as many acres of the project area as possible. In our comments we stated that given the poor forest health across the landscape and the recent history of catastrophic wildfires in the area including the Northstar and Stickpin fires, AFRC strongly suggests expanding the areas to be commercially thinned.

Table. 1 Management Areas in the Sanpoil Project Area, Descending Order of Prevalence

2019 LMP Management Areas*	Summary of Goals/Objective	Acres in Project Area	Percent of Project Area
General Restoration	Emphasis is on providing landscape composition, structure, and pattern that supports desired conditions for vegetative systems, aquatic, plant, and wildlife habitats. Landscape alteration will utilize a combination of ecological processes and management activities in order to achieve these desired conditions.	25004	52%

Specifically 25,004 acres within the project area are designated for General Restoration (See Table 1 above). Treating more acres would be consistent with all three goals of the purpose and need and would better protect the lands under the TPA, other adjacent land owners and provide additional forest products to the local infrastructure. Since so much of the southern boundary of this project that adjoins the Colville Reservation is in roadless areas, all treatable lands outside the roadless areas should be treated to prevent insect and disease, and wildfire from spreading from national forest lands onto Tribal lands.

Now, the Forest is planning on treating only 7,808 acres commercially and AFRC believes they have not totally met any three of the Project Purpose and Need by only treating this number of acres commercially.

2. **The Forest chose not to manage 2,682 acres in the Old Growth Dependent Species Habitat in the project area.**

AFRC submitted comments in both our scoping and Draft EA that suggested the Forest should actively perform commercial thinning in designated old growth areas to reduce the risk of wildfire and to help promote the values that the Forest Service is trying to achieve which is improved habitat and diversity for wildlife and plant communities. Too often old growth areas do not get needed vegetative treatments to improve their health and vigor and to reduce fuel loadings and they ultimately get damaged or destroyed by these elements.

3. **The Forest chose to reduce the acres treated using shaded fuel breaks.**

In both our Scoping and Draft EA comments AFRC supported the plan to treat 2,468 acres using shaded fuel breaks along major travel routes. In the Final EA the Forest has chosen to reduce that number to 2,270 acres. The stated purpose of the shaded fuel breaks are for reducing canopy and surface fuels in areas of strategic importance for wildfire containment. Reducing the areas receiving these treatments does not meet the stated intent of this Project.

4. **The Forest has planned to decommission 2.6 miles of system roads.**

In our Draft EA we commented that thorough analysis of what roads will still be needed for future fire access, forest treatments, recreation etc. should be conducted before the final plan is adopted for roads to keep as system roads and those to delete. While AFRC agrees that some roads need to be **closed we prefer gating or blocking rather than obliteration or decommissioning.**

The proposed action would decommission approximately 2.6 miles of NFS roads in the project area. Decommissioning includes applying various treatments that are designed to reconnect surface and groundwater hydrology. Examples of methods that may be used include:

- Reestablishing former drainage patterns, stabilizing slopes, and restoring vegetation;
- Blocking the entrance to a road or installing water bars; Removing culverts, reestablishing drainages, removing unstable fills, pulling back road shoulders, and 27 scattering slash on the roadbed;
- Completely eliminating the roadbed by restoring natural contours and slopes;
- Other methods designed to mitigate the specific resource concerns associated with the road.

We do not support eliminating roadbeds by restoring natural contours and slopes. We only prefer the blocking or installing water bars etc.

5. The Forest has not planned on doing any regeneration harvests to supplement early seral species for deer and elk.

In our Draft EA comments we suggested that 6,904 acres of big game winter range are within the project area. The Colville National Forest is short of early seral plant stages needed for big game forage and overstocked on cover. AFRC suggests using the regeneration harvest tool in these areas to produce more early seral plant communities for big game forage.

Resolution Requested

1. AFRC requests that the Forest reanalyze ALL potential areas that can and need to be treated. We do not believe the Forest has done an adequate job of detailing why the treatment acres have dropped from a possible high of 14,517 acres within the project area are designated as wood/forage MA-7 down to 7,808 acres.
2. The Forest should Forest actively perform commercial thinning in the old growth designated units to reduce the risk of wildfire and to help promote the values that the Forest Service is trying to achieve which is improved habitat and diversity for wildlife and plant communities.
3. The Forest should not have reduced the treatment acres in the shaded fuel break areas from 2,468 to 2,270.
4. AFRC wants the Forest to use gating or blocking rather than obliteration or decommissioning of unneeded roads.
5. AFRC would like to see the Forest use regeneration harvests on the 6,904 acres of big game winter habitat.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held with all objectors present. AFRC believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Tom Partin, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,
Travis Joseph
President