

From: [Tom Partin](#)
To: [FS-appeals-northern-regional-office](#)
Cc: [Cindi Kaneshige](#)
Subject: Buckskin Saddle Objection Support Letter
Date: Wednesday, August 26, 2020 3:52:45 PM
Attachments: [Buckskin Saddle Objection Support Letter.pdf](#)

Attached is a support letter for the Buckskin Saddle Project on the Idaho Panhandle National Forest as it moves through the Objection process. The Project didn't consider or support all of our AFRC input, however, we believe it is a good project and needs to be implemented.

Thank you,

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VIA Email: appeals-northern-regional-office@usda.gov

August 25, 2020

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment during the Buckskin Saddle Objection Period.

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.

AFRC is not writing to submit a formal objection, since the objection period is open, but rather to support your Draft Record of Decision and to thank you for responding to some of our comments. We still believe that with site specific conditions on the ground, some of our earlier comments to the Project can still be implemented. AFRC submitted scoping comments on September 3, 2019, and Draft EA comments on January 24, 2020. Both of these documents may be referenced in these comments.

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 rep rap for road stabilization, and increase road access where needed for vegetation management.

From our scoping letter and Draft EA comments, AFRC would like to highlight why we support the Buckskin project moving forward.

1. One of the main reasons that AFRC supports the project and feels it should move forward quickly is because 57 percent of the project area occurs in the Wildland Urban Interface (WUI). Much of the needed treatments in the WUI besides commercial harvest will come from the revenues derived from the stumpage of timber sold. For those reasons 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 believes the Forest has done a good job of analyzing how important commercial treatments are across the landscape for providing resources for the local sawmilling infrastructure and for creating jobs. 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. AFRC commented on the logging systems that are to be used in the project. Those include:

Table 2. Logging systems

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

AFRC believes that that Forest can provide the flexibility needed within your final document to perhaps allow ground based skidding on steeper slopes and also minimize the number of helicopter acres. As you know, 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. AFRC strongly supported the Forest's 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.

5. AFRC also supports the Forests' 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
6. 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.
7. The Idaho Panhandle Forest has always done a good job of using new tools and expedited procedures when implementing projects. For that reason AFRC is certain that the Forest will consider the use of DXP which 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.

For the reasons listed above AFRC supports the Buckskin Saddle Project moving forward and we are supportive of the current plan, with the suggested improvements listed.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tom Partin
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