

I would like to thank the USFS for giving the local community this opportunity to comment on the Scattered Lands Project and commend them on their stewardship efforts. I have owned property adjacent forest lands for the past 39 years and have worked in the forests of the Pacific Northwest for the past 38 years. In January of 2021 I was informed by mail of the Scattered Lands Project and the need to respond by February 8th 2021. My initial thoughts/concerns on the project are as follows:

1. I support the need for fuel reduction through thinning and a variety of burn methods. I also realize and appreciate the difficulty in finding the correct balance in presenting information and data to the general public. However, the current plan as presented to me appears to be vague, overly simplistic, and does not adequately convey and address risk/benefits to adjacent landowners, wildlife and the local economy.

Landowner Concerns

2. Nomenclature is important; it's imperative that everyone has the same understanding of terms commonly being used such as "forest", "thinning" and "large diameter". Please clearly define the terms listed above. It appears as if the thinning prescriptions are heavy, were other alternatives/outcomes considered? If so, what? If not, why? Please place a numerical value on the "large diameter" seed/shelter trees which will be left in the units.
3. Although landowners were given enough time to review the material sent to them, they have not been given enough time to review relevant background materials; I would very much appreciate the opportunity to make comments on a formal Environmental Assessment.
4. With regard to the Environmental Assessment, it is unclear if the Scattered Lands Preliminary Effects Analysis has been written as the Environmental Assessment; can you please clarify this for me? Additionally, the Idaho Panhandle National Forest Joint Collaborative Forest Landscape Restoration Proposal (undated) states that the IPNF has identified 120,000 acres that have Environmental Analysis, 120,000 additional acres without analysis, and 680,000 acres for opportunities in back country areas. It seems, given

that the potential scope of the project is much larger than ~6,000 acres currently proposed, it would be prudent to complete an Environmental Impact Statement which would examine the cumulative effects of the collaborative fuel reduction plan.

5. Forest Service Policy directs land managers to normally limit the size of even-aged silvicultural methods to 40-acres or less. The Scattered Lands Proposed Action plan states “if needed, Regional Forester authorization to exceed 40-acre regeneration openings would occur **after** the current public input”. My interpretation is that landowners would not have the opportunity to comment on unit plans larger than 40-acres if they are authorized by the Regional Forester. I would encourage the USFS to reconsider, and let the public comment on planned openings greater than 40-acres for the following reasons: 1) In general, larger prescribed burns increase fire-risk to adjacent landowners at burn time 2) the effectiveness of fuel reduction through controlled burns can be limited to 2 to 4 years if an adequate plan for site maintenance has not been identified and 3) there is some evidence that better results for fire application can be attained in heterogeneous landscapes and in areas where severe winds are less likely (Fernandes, 2003). Consequently, fire risk after the fuel reduction plan has been implemented may increase long term for some adjacent landowners. Hence, they should have the opportunity to be involved in decisions which may put their properties and homes at greater risk.
6. Over 85% of wildfires in the US are caused by human activity (Short, Karen C. 2017. Spatial wildfire occurrence data for the United States, 1992-2015). Although the human caused wildfire percentage varies regionally, with recent local fires and an increased focus on fuel reduction it is likely that more private landowners will be trying to maintain fuel loads with inadequate back-up support and burn control knowledge. The Scattered Lands Comment Period Packet states that “A large part of this coordinated effort will focus on directing interested landowners to the best resources...”. However, landowners who need assistance the most are often the least engaged, one way the plan could be more pro-active in assuring that adjacent small-scale private landowner activities are

completed in a safer manner is to let adjacent landowners know ahead of time (as much as possible) when burns are scheduled. Thus, in some cases private landowner burn piles and USFS burn pile/control burns could be done simultaneously increasing the likelihood that spot fires on either side of the property boundaries are more likely to be caught and appropriately addressed

Wildlife

7. The Scattered Lands Preliminary Effects Analysis states “All large trees will be retained unless they do not contribute to future stand health and resistance agents of disturbance”. However, my understanding is that 2,926 acres will be treated as seed tree reserves leaving 5 to 7 (large diameter) trees per acre as seed trees. The way I interpret this is that at a 10ft. spacing there would typically be ~435 trees per acre. The USFS proposes to remove 99.98 percent of the trees (in areas where 30% of a given proposed treatment area is outside the harvest unit boundary), leaving 5 to 7 widely spaced trees (if present, western larch, western white pine or ponderosa pine), this is designed to regenerate and maintain a stand with two age classes. Please address expected outcomes for the 5 to 7 trees and their regeneration potential given potential increases in wind velocities and precipitation based on Climate Change modeling? The same question applies to leave trees in shelter stands. Additionally, clarify if required riparian buffers are included as part of that 30% leave calculation or would mandated buffers be trees in addition to the number listed in the harvest unit plans?
8. My understanding is that deer habitat is often based on a basal area / acre of ~60. In order for a seed tree unit to have this basal area / acre ratio the average tree diameter would have to be 39 inches if 7 trees were left in the stand, an unlikely scenario in this area. Although a Game Unit is shown on the map, it is unclear how this relates to the current plans, if it will support enough winter refuge for the local population or if deer will be forced into one area where hunting is allowed. Please provide additional information?

9. During the zoom meeting with the USFS I inquired about herbicide use and was told that the only herbicide use would be adjacent to roadways. However, given that there will be large canopy openings and disturbed soils, it should be expected that in some stands invasive species may return in greater abundance than pre-treatment conditions. Since herbicide use is likely to be implemented, please list what herbicides and possible adverse effects on the ecosystem and ESA listed species?
10. The plan mentions problems with disease and insects, but is not specific with regard to the units being targeted for disease/insects vs. just fuel reduction or economic value. More information is needed with regard to type of disease, age of stand, diversity of stand etc.
11. In 2000, Rick Brown wrote Thinning, Fire, and Forest Restoration A Science-Based Approach for the National Forest in the Interior Northwest, in his report he has determined that “too often, discussions are framed in terms of forest health, fire risk and hazard, insect and disease potential, conserving wildlife or fish habitat, or hydrologic condition. The concept that shows the greatest promise for encompassing all these concerns, and more is ecological integrity...the essential components of ecological integrity are the same as those that have been described as basic to ecosystem sustainability: soils, water, species diversity (habitat), resistance to disturbance and evolutionary potential.” The current plan focuses on Timber production, local economic growth and fire protection through heavy fuel reduction over ecological integrity, please explain why you made this decision?

Economy

Historically, in the 70's and 80's the USFS hired seasonal employees and local contractors for thinning, fire-suppression, and planting. It was not unusual for a seasonal employee hired in one department to work in another department extending the term of their seasonal employment. These employees were rarely

hired as full-time employees and did not receive the benefits/pensions that full time employees benefitted from, however, employment from year-to-year was reliable and money earned was spent in the local community. As described by Hal Herring (High Country News, Oct. 30,2017) during the 80's more of the work was contracted out, initially to local residents, however, as funds and competition increased more and more contracts went to non-local H-B2 immigrant visa workers and less and less work went to the local community. As contracts became increasingly more competitive more contracts were awarded to immigrants at increasingly lower wage rates creating an "indentured servitude" system which did not benefit the local community or immigrant population. Given that the Trump administration increased the number of H-B2 immigrants allowed into the U.S., please explain in more detail how the Scattered Lands Project intends to benefit the local economy long-term and address the hypocritical views of the political system (both left and right) which according to Hal Herring either underfunds the USFS budget or supports hiring of immigrants over locals. Specifically, will the USFS be willing/able to hire more local full-time employees for the Scattered Lands Project?