Comments of Charles Rial

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1.) In the commercial logging elements of the EA, it would best if Federal Funds to support commercial logging could be utilized to reduce the need to harvest larger trees in order to make any sale more economical. The EA should more aggressively pursue a long term strategy to increase the amount of old growth stands in the Forest as that stand type is most resilient to fire.

2.) Cooperative Agreements should be sought with landowners contiguous to, or within the Forest boundary as to the specific treatment near their property. This could also entail landowners, in cost-sharing or at their own expense thinning the areas near their properties on Forest land. This would of course have to be completed with appropriate USFS supervision and the thinning would be non-commercial in nature. Perhaps a 400 yard perimeter from the private landowner's property into Forest Service lands might be considered for this approach.

3.) The Larry Creek Stewardship project/sale of 5-10 years ago raises several issues/questions related to the actions proposed on the Bass Creek/ Sweeney and Brooks portions of the project:

a.) The Larry Creek Stewardship Project in my view took too many large trees in order to make it more profitable for Pyramid and others. As suggested in 1.) above, using available Federal Funds to reduce the commercial pressure on these future projects would reduce the need to cut larger trees. If the goal is a fire resilient forest then encouraging the establishment, not just the maintenance, of old growth stands should be among the stated objectives.

b.) as I believe the USFS agrees, weed management after the Larry Creek Stewardship Project was sub-optimal. Significantly more resources must be devoted to re-seeding and spraying then was accomplished in that instance. This is especially true along skid trails and decking areas. Recently, the USFS has begun to ameliorate this problem but more effort is needed. The entire Sweeney/Bass Creek and to a lesser extent Brooks area needs more aggressive weed management. It will improve recreation value and add to forest resilience.

c.) given the scope of the Larry Creek Stewardship Project (if I recall, 1,000 logging truck loads of timber were harvested), specifics on what still needs to be accomplished, which in the pan is called the Sweeney area need much better articulation. Where exactly is more commercial logging needed, given the extensive harvest of just a few years ago? I would hope that the next iteration of the EA would address this directly.

4.) On the Sweeney area of the EA, it is stated that commercial logging will only occur within 1/4 mile of existing roads and that some roads will be de-commissioned or obliterated. I applaud this approach. No new roads is a good idea. We have plenty. Again the devil is in the details. I am supportive of logging in this area but it is all dependent on how well it is executed. Orientation towards, long -term old growth can also be accomplished as the treatments move up the road towards the end of FS Road 1136. Execution in terms of tree selection and after-harvest handling of slash and weed mitigation are key. The same can be said for the Bass Creek and Brooks portions of the project.

5.) On the Brooks portion of the project I am pleased that no concept of new roading is suggested. The small elk herd that calls Brooks home receives significant pressure with no roads. Harvesting, as well as slashing and burning in that area should avoid sensitive time frames for that small herd. Given the fire of 2009 it would be helpful to understand where specifically you think treatment is needed. The lower reaches of Brooks are accessible via the Ruffatto Land & Cattle Co.--is the intention to access the lower reaches via their access? You also show some commercial logging on the ridge immediately adjacent to the Rial Family property. I am not clear how you will access that area and remove harvested timber. Skidding all the way down that ridge will be problematic, and create a skid trail of considerable length. In my view there is not enough commercial timber on that ridge to make harvesting worthwhile. On that ridge, pre-commercial thinning of the smaller trees, to me, would be a far better choice. There is a relatively old growth stand of Doug Fir, just before it transitions to Lodgepole in the SW reaches of Brooks, not far from the dimple on the ridge that turns to cliffs on the Kootenai side. All efforts to protect and enhance this stand would be beneficial. The mid and upper reaches of Brooks are relatively low on weeds. So care should be taken to not make the situation worse. The specific type of slashing and burning to be accomplished on Brooks needs further clarity. A better understanding of the more precise nature of the treatment here would be helpful.

6.) Bass Creek portion: There is a need for some thinning along the trail as well as weed mitigation. There is a relatively old growth stand of Larch after O’Hare pond and before the Wilderness Boundary. Care should be taken to enhance this stand. There are also a number of large diameter Ponderosas as you go up the canyon and these should be excluded from any harvest plans.

7.) Articulation of what Federal Funds are likely to be allocated/or sought for the project and the Forest’s view of the priority for those funds would be helpful.

8.) Noted is the desire under the plan to build more roads in the project area. I am not fully familiar with the areas slated for new roads, but I am not clear they are necessary. An articulation of the cost-benefit of these roads would be helpful.

Thank you for the opportunity to comment.

Charles Rial