

Final Buffalo Comments and Concerns

Thank you for the opportunity to comment on the Buffalo project. We appreciate that the Northern Hills Ranger District (NHRD) is considering the project. Our general impression is that the project has a wide benefit to many forest users and will also benefit wildlife and reduce hazardous fuels.

Commercial Timber

Lawrence County (LC) is concerned with the project's focus on Habitat Structural Stage 4A for commercial treatments within the project. LC has reviewed the stand data provided by the district, as well as analyzed recent aerial photos of the project area. LC is concerned that there are Shelterwood Removal (SR) and Shelterwood Establishment (SE) treatments being applied in stands that may not be silviculturally ready for these treatments. LC is also concerned with all the deferred treatments in the HSS 4B & 4C stands. A significant number of these stands have been deferred from treatment over the past 30 years and some even have current Mountain Pine Beetle (MPB) activity noted in the NHRD's notes. LC requests a meeting with the NHRD to address our concerns as a local government. In addition, there is commercial harvest potential in some mixed stands that should be identified.

We are pleased to learn that the District will apply flexibility in terms of location and type of treatment for all treatment types including commercial harvest. We request that this be clearly articulated in the EA that it applies to all HSS and the impacts evaluated so that the District does not limit its options when conditions on the ground are found to be different from what was understood when the EA and decision was made.

Discrepancies In Acres

We would like to see the following be clarified and addressed in the EA.

- How many acres are in 4B and 4C. FS Veg shows the following
 - HAB_STRUCT 4B stands 2797 acres HAB_STR_ST 4B 3743 acres
 - HAB_STRUCT 4C stands 401 acres HAB_STR_ST 4C 157 acres

There are 688 acres of pine that have nothing written in the Scope Treatment attribute of the Proposed Action Timber Treatment. While some of these stands may not have any treatment opportunity, there are others that display opportunities for commercial harvests, whether it be Hardwood Enhancements or Commercial Thin. Unless there

are extenuating circumstances, we recommend that these areas be considered for treatment.

There are also significant acres of aspen within pine stands that could be delineated out with a treatment specified to address these areas.

- There are some discrepancies in discussion of aspen in ForVeg attribute table. ForVeg states 1,969 acres, scoping states 2272 acres. Total aspen/birch acres 3097 acres. Scoping states 2700 acres. Additional hardwoods 865 acres (650 acres labeled TPP)

Hazardous Fuels Treatments/Thinning

We noted that the project description document states there are 2570 acres of hazardous fuels treatments/precommercial thinning.

- Many of these are on south slopes that appear to have significant commercial harvest needs within them. We recommend including commercial thinning to reduce canopy closure wherever possible.
- Thinning spacing should be no more than 12 feet apart. 5.1 MA. difference between 12 feet spacing vs 20 feet spacing on 4 inch trees when they grow to 9 inches is 1362 cubic feet/ac vs 490 cubic feet per acre respectively. While it may take the 12 ft spaced trees another 1- 2 years to reach 9 inches the basal area of the 20 ft. spaced trees at 9 inches will only be 48 sq. ft. per acre vs the 12 ft. spaced trees will be a 134 sq. ft./acre and ready to be commercially thinned.

Prescribed Fire

There are 15,170 acres identified for prescribed fire treatments. There are many acres that do not have treatments scheduled. Will these areas be prescribed burned? As stated in previous comments from LC on other projects, we strongly recommend the project include mortality limits for Prescribed Fire as outlined in a letter to the Districts by Forest Supervisor Mark Van Every. LC would be happy to supply this document if the NHRD does not have a copy.

Mountain Pine Beetle Risk

There should be a discussion about MPB risk in the project scoping or project description. At the minimum, this discussion should include:

- 532 acres of deferred stands have recent MPB activity.
- What is the current number of acres at high risk?
- Commend including the Sanitation/Salvage provision

- Explain MPB risk rating and the risk of trying to save 4B and 4C

Deferred Areas (no treatment areas)

There are 1,909 acres deferred for HSS objectives, specifically 4B and 4C. The NHRD is wrongfully allowing a Forest-wide objective to limit its ability of creating resilient stands in the face of MPB and wildfire risks. LC supports actively managing the 4B and 4C stands. LC requests treatments in these stands to reduce their susceptibility to MPB and wildfire so that we may continue to grow these stands into the future.

There are 661 acres deferred for other objectives or concerns. As can be seen from aerial photos, many of these acres are open and may not be in need of treatments, we recommend relooking at these acres to see if any of the commercial or noncommercial treatments would benefit the stands. Please clarify the objectives and concerns in the EA.

Aspen Treatments and Cattle/Big Game Browsing

We agree with the approach of treating large areas of aspen so that regrowth will outpace browsing use by big game and cattle. We appreciate your commitment to maintain strong communications with the affected permittees through this planning process and prior to implementation of treatments.

We do anticipate that there will be a need to leave cattle trails open from downfall that occurs from treatment. We recognize that you want to discourage cattle use in all treated areas, but in some cases, cattle trails will need to be left open to provide for cattle access to water sources or other management activities.

Cooperating Agency Status

Lawrence County requests to be a cooperating agency for the project. The management decisions the FS makes significantly impacts private land inholdings within this project area and the lands surrounding it. Lawrence County is best qualified to represent their interests and should be granted cooperative agency status to allow us access to the technical data sooner and that we may be involved in the decision-making process. Cooperative agency status is the best model of collaboration to follow. The Counties Natural Resource Committee meets the special expertise or jurisdiction as described in 40 CFR 1501.8. Please provide us with a written response with rationale to this request by May 1, 2025.

We look forward to working with the District and the Forest on projects such as this. If you need additional information, please contact Eric Jennings. Specific forest management questions can be directed to Bill Coburn.

