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Comments: Buckskin Saddle Scoping Comments

Attached are AFRC's scoping comments on the Buckskin Saddle Project. Please keep me informed as it moves forward to the Draft EA phase.

Thank you,

Tom Partin

AFRC Consultant

Dear Michelle:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Buckskin Saddle Integrated Restoration Project (Buckskin Saddle Project).

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.

The Buckskin Saddle project is located about 2 miles southwest of Clark Fork, Idaho. The project area encompasses approximately 50,600 acres which includes Granite Creek, Johnson Creek, and other small tributaries to the lower Clark Fork River and Lake Pend Oreille. Most of the area is located on the Sandpoint Ranger District in Bonner County, Idaho. However, a small portion of the area (approximately 1% or 500 acres) is located on the Coeur d' Alene River Ranger District in Shoshone County, Idaho. The project area is situated on the eastside of Lake Pend Oreille and to the south of the Clark Fork River. The focus of this project is to make the stands within the project area more resilient to disturbances such as drought, insects, disease, and wildfire. The north and west of this project area is also within the Wildland Urban Interface.

These areas contain decadent stand conditions with excessively high fuels build up.

AFRC provided pre-scoping comments on April 3, 2019 and we appreciated the Forest reviewing and using some of our suggestions in the pre-scoping document.

The Forest has taken an in-depth look at existing conditions of resources in the project area with the desired

conditions described in the Forest Plan and identified the following project objectives and management needs which AFRC agrees with and supports.

[middot] Improve the resiliency and resistance of the forest vegetation to disturbances such as wildfire, drought, insects and diseases.

[middot] Decrease the quantity and modify the arrangement of hazardous fuels to create a lower intensity and lower severity fire environment.

[middot] Contribute to local economies through the production of timber products.

[middot] Reduce sediment delivery to streams from the forest road and trail networks and restore aquatic organism passages to improve aquatic resources.

[middot] Improve the dry site stand conditions for flammulated owl habitat and increase the amount of browse for elk.

[middot] 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.

[middot] Maintain and improve trails and trailheads for multiple user groups.

[middot] Improve existing system roads to provide for safe and efficient travel, develop rock pit/quarries to provide material for road graveling and rip rap for road stabilization, and increase road access where needed for vegetation management.

AFRC member companies have participated in the collaborative group that has supported this project. While our members are interested in the timber products that will come from this project, we also know how important it is to improve and develop other resources found in the project area. Much of this resource improvement work will come from the revenues derived from the stumpage of timber sold. With this in mind, AFRC offers the below suggestions that we feel will support or improve the Buckskin Saddle Project.

1. AFRC is pleased to see that the Forest is commercially treating 13,321 acres out of the total 50,600 acre project area or 26% of the land. There are two Roadless Areas within the project area that takes a good portion of the land out of management options. The entire 5,894 acre Schafer Peak IRA occurs within the project area, and approximately 5,996 acres of the 9,310 acre Packsaddle IRA overlap with the project area. However, some areas are being analyzed for treatment. Treating a large portion of the project area is important for many reasons. There are compelling forest health conditions that must be addressed which dictates the needs to treat much of this project area for forest health and fuels reduction. Further 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. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

There are several social and economic goals and desired conditions of the 2015 IPNF Forest Plan that also need to be addressed including:

GOAL-SES-01: Contribute to the social and economic well-being of local communities by promoting sustainable use of renewable natural resources. Provide timber for commercial harvest, forage for livestock grazing, opportunities for gathering firewood and other special forest products, permitted recreation residences, and setting for recreation consistent with goals for watershed health, sustainable ecosystems, biodiversity, and scenic/recreation opportunities.

FW-DC-SES-01: Outputs and values generated by the Forest contribute to sustaining social and economic systems.

FW-DC-SES-02: The outputs and values provided by the Forest contribute to the local economy through the generation of jobs and income while creating products for use, both nationally and locally. Jobs and income generated by the activities and outputs from national forest management remain stable contributing to the functionally economy surrounding the IPNF.

FW-DC-SES-03: The outputs and values provided by the Forest contribute to community stability or growth and the quality of lifestyles in the Plan area.

2. AFRC supports the Forest's plan to manage within the IRA's. The western end of the Schafer Peak IRA abuts private property that contains dozens of seasonal homes and other improvements. That portion of this IRA occurs within a Community Protection Zone (CPZ) as defined by the Idaho Roadless Rule and currently contains very unhealthy forest stands with hazardous forest fuels. Within the General Forest portion of this IRA, approximately 101 acres of forest stands have been identified for potential commercial treatments. In addition, 294 acres of natural fuel burns would occur in the General Forest portion of this IRA. Within the Backcountry Restoration portion of this IRA and within the CPZ there are 231 acres that have been identified for commercial treatments (117 acres improvement cuts and 114 acres shelterwood with ground-based yarding) and an additional 390 acres of natural fuel burns (no commercial tree cutting/removal). AFRC believes these treatments are necessary to address the buildup of heavy fuels in and around the private property.

3. AFRC recommends heavy thinnings in and around the Wildland Urban Interface which represents 57% of the project area. Fuels reductions and forest health treatments are needed to protect the private property. In these areas we recommend thinning to a 40 sq.ft. basal area standard.

4. AFRC strongly supports the 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 would support 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. For the most part AFRC supports the road system plan for the project which is listed below:

However, we are concerned about the possible large cost for Road reconstruction activities. Those will include realignment, road widening, the addition of turnouts and improvement and/or addition of drainage structures. The proposed action also includes maintenance and repair work on two road bridges in the project area. Planned work also entails expanding four gravel pits and constructing up to six new pits. AFRC encourages the Forest to be cognizant of the cost of road work and road storage and not to overload the project with these expenses.

7. AFRC believes that DXP 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.

8. 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.

9. During our summer AFRC field trip to the Honey Badger Project we discussed the possibility of using tractor logging on slopes over 35 percent. Some of the areas seemed to lend themselves to this harvest method and we encourage the Forest to allow this equipment on steeper slopes for this project. AFRC recommends the Forest giving the latitude to use ground-based equipment on slopes up to 45 percent for this project. If the Forest is hesitant to use this criteria across the entire project area, perhaps certain areas could be laid out for test areas.

Thank you for the opportunity to provide scoping comments on the Buckskin Saddle Project. The Forest has done a good job of planning restoration needs for many of the resources in the area. I look forward to following the implementation of this project as it moves forward.

Sincerely,

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