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

July 21, 2021

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 provide Objection support comments for the Westside Restoration 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 Westside Restoration project area is approximately 60,000 acres in size and is located within Boundary County, Idaho encompassing the Myrtle, Snow and Caribou Creek watersheds and Dodge Peak and White Mountain areas. Activities are proposed on federal lands administered by the Bonners Ferry Ranger District. This project is being developed in collaboration with the Kootenai Valley Resource Initiative (KVRI) to complement other landscape restoration work in the Lower Kootenai River Valley CFLRP.

While we are writing to express AFRC's support for the Project during the Objection period, we still have concerns that could be addressed during implementation. In both our scoping letter submitted on January 13, 2020, and our Draft EA comments submitted on December 30, 2020, we supported and continue to support the Objectives and Management Needs proposed under Alternative 2. Those objectives and needs have been endorsed by KVRI. While we support the

Project, we remain disappointed with components of the selected Alternative. The selected Alternative 2 (modified) would authorize vegetation management on a total of 11,364 acres and activities would include about 7,152 acres of commercial timber harvest and approximately 4,212 acres of pre-commercial thinning and prescribed burning for natural fuels reduction. This is a reduction of 812 acres of commercial harvest from the 7,964 acres proposed in the Draft EA that will represent a substantial reduction of timber volume.

Specifically, AFRC remains concerned about certain aspects of the Project particularly in the scale of management including:

1. As we pointed out in our Draft EA comments, we always encourage the Forest Service to treat as many acres as practical when preparing an EA or EIS. 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 increases the timber volume that will be produced. The National Forests in Idaho are very important for providing the raw materials that sawmills in the region 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 18-20 direct and indirect jobs are created for every one million board feet of timber harvested. Without this material, our members would 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. Further, 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. Failure to manage the appropriate number of acres today will impact the ability to produce the timber needed in the future. Also, the Forest must understand the "restoration" treatments that are desired in this Project cannot be implemented without a heathy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed.

   While AFRC is disappointed that the scale of commercial harvest has been reduced, we appreciated the District's response to our request to treat more acres: *"We appreciate your perspective on National Forest System Lands management and your recognition of the tradeoffs associated with treating fewer acres. Treating more of the project area would undeniably benefit forest resiliency and wildfire hazard. Our local communities and timber-dependent industries would also benefit from any increased volume outputs associated with more treatment-associated harvest.*

   The need to meet a variety of multi-resource management objectives influenced the development and evolution our proposed action. Our proposed action and prescriptions need to account for a full range of management objectives. The reduction in the acreage

proposed for treatment was almost entirely due to associated Forest Plan, ESA, Clean Water Act and BMP requirements and standards. Throughout the project planning and collaboration process the need for site specific modifications and proposed action modifications was brought forward and/or confirmed through extensive field surveys and analysis. Our proposed action remains ambitious, and while striking a balance by necessity, it will do much to meet the varied blend of management objectives across the project area."

2. AFRC also voiced concern that the district is not treating more acres to reduce the threat of crown fires in the WUI. In addition to treating more acres in the WUI, AFRC would like the District to consider using heavy thinning or regeneration harvests near property boundaries to reduce the fuel loadings and to prevent the spread of insects and disease. We suggest thinning stands to 40 sq. ft. of basal area adjacent to private land for these purposes. Again, while not proposing more acres for treatment, we did appreciate the District's response to our request:

   "*The Westside project is an interdisciplinary, multi-resource restoration project. While fuels reduction in the WUI is one of the goals, it is not the only goal. We agree that treating fuels to reduce the threat of crown fire is important in this area and that is why following implementation, several thousand acres would be moved from expected passive or active crown fire, to surface fire (crown fire analysis beginning on page 22 of the fire/fuels report – crown fire hazard reduced by ~19%). However, resource concerns ranging from effects on certain species of wildlife, to soil disturbance, potential impacts to water quality, possible damage to cultural resources, or other, can result in proposed treatment modifications and sometimes reductions in acres treated. At times, reasons outside our control (law) may be at play. The proposed action would still reduce fuels on over 12,000 total acres in the project area. A stand-specific, step down diagnosis process was utilized to assign the appropriate vegetation treatment (if any) needed to meet restoration and resiliency objectives. (Vegetation Report p. 2). If target stand structure and composition was achievable through an intermediate treatment, then that was what was prescribed. All proposed treatments will effectively reduce both fuel loading and insect and disease hazard.*

3. AFRC does not believe the Forest has adequately addressed the issue of meeting the purpose and needs of landscape and stand resiliency to the fullest extent across the Project area. Alternative 2 modified B would only increase ponderosa pine, western larch, and western white pine forest cover types by approximately 5,196 acres. (See the chart below).

Table 8. Effect of Proposed Action (Alternative 2) on composition within treatment units (acres).

Forest Cover Type	Existing	Proposed Action	Change
Ponderosa Pine	254	1,416	1,162
Douglas-fir	2,796	1,834	-962
Western Larch	373	2,765	2,392
Western White Pine/Western Larch	449	2,091	1,642

The project area is 60,000 acres; thus, the Forest is only improving about 9% of the acres to a more resilient state. Once again, the Forest has missed an opportunity to fully implement this purpose of this Project.

4. AFRC is pleased to see how the District addressed our request for allowing flexibility in logging methods which focuses on descriptive end-results:

   "*Operational flexibility and adaptive technical approaches towards end-result or objective based management will continue to be considered during contract implementation as technology and equipment standards improve. These options will be addressed site specifically to support increased personnel safety and/or resource protection measures."*

5. AFRC is pleased to see how the District addressed our request to keep road decommissioning to a minimum which would allow for the use of those roads in the future for logging and for fire access:

   "The road recommended for decommissioning is currently not drivable, and therefore, access would be unaffected. However, putting some of the proposed roads into storage would result in reduced vehicle and engine access in the event of a wildfire, potentially affecting suppression response times, fire growth, and fire costs. This would be specific to roads 1309 and 1309C, the end of 2405 and 2405A, and the 2646A - making fuels reduction activities even more critical. Other roads proposed for storage are either not currently drivable or provide only minimal land access, so storing them are of little concern from a fire management perspective. Storage is preferred to decommissioning from a fire management perspective because a stored road remains part of the road system (a decommissioned road does not). In the event of an emergency (wildfire), a stored road can be reopened for fire suppression resources."

6. AFRC continues to support the District's use of regeneration harvests. The regeneration component of the proposal would result in multiple openings greater than 40 acres, a reflection of the extent and scope of declining forest health and existing fire hazard in the project area. Openings would range in size – many of them less than 100 acres, but a few of them are over 300 and 400 acres. Forest Service policy directs land managers to normally limit the size of harvest openings created by regeneration treatments to 40 acres or less. However, exceptions to this limitation are allowable with Regional Foresters

approval; a request to exceed the size limit would be made in accordance with this policy. AFRC supports the District requesting approval to implement regeneration harvests in unit sizes over 40 acres.

AFRC is pleased to see the District's response and request for this action: *"Direction provided in the Region 1 supplement to Forest Service Manual 2471.1 has been followed (EA, page 10; "Vegetation" report, pages 12 through 13) and regional forester approval would be obtained for the units that would exceed the 40-acre opening size limitation (project file)."*

7. In both our scoping and Draft EA comment letters we encouraged the Bonners Ferry District to consider several documents related to carbon sequestration related to forest management. AFRC submitted the links to those studies. We were pleased with the District's response: *"These references are part of the project file, and their findings support the analysis in the Climate and Carbon report for this project."*

8. Finally, AFRC believes the District did a very good job of analyzing the impacts of this Project on the Grizzly Bear and Canada lynx.

Grizzly Bear---*"The Westside Restoration Project would temporarily reduce Core habitat and increase road densities in the Myrtle Bear Management Unit (BMU) through temporary road construction and reopening of currently impassable roads. Following implementation, Core would increase (compared to the pre-project condition) as a result of proposed road storage and decommissioning of temporary roads. Similarly, security habitat in the Pack River Bear Outside of Recovery Zone (BORZ) area would be reduced during project implementation from road construction and reconstruction, however, would be restored after project completion. Core habitat in the neighboring Ball-Trout BMU would increase through conversion of a currently open road to a non-motorized trail. Open Motorized Route Density (OMRD) in the Myrtle BMU would not exceed the Forest Plan standard of 33% during any single phase of implementation. The Westside Project would result in short-term adverse impacts to grizzly bears as a result of road construction/reconstruction, disturbance from timber harvest and other mechanized activities, and reduction of hiding cover. However, there would be long term improvements to habitat through increased Core and improvements in grizzly bear forage." While there would be some negative impacts in the short-term, long-term the Project would be benefitting the Grizzly Bear*."

Canada Lynx--*"The activities proposed under the North Zone Roadside Salvage EA include approximately 33 acres of salvage logging and 4 acres of roadside maintenance within the Cascade LAU (no salvage activities were proposed in the Snow LAU). Roadside salvage and maintenance would have minor impacts on lynx habitat and snowshoe hare habitat and would not alter snow conditions on a landscape scale. Although denning habitat could be reduced in salvaged areas, it is proposed on less than one half of one percent of lynx habitat within the LAU. Additionally, denning habitat is abundant and well-distributed throughout the LAU and would continue to be following implementation. Consequently, this project would have little impact on Canada lynx in*

the Westside Project area, and cumulative effects would be minimal." Long-term, the Lynx would benefit from the Westside Project by creating more habitat for snowshoe hare which is its primary food source in winter."

Thank you for the opportunity to provide a letter of support for the Westside Restoration Project during the Objection Phase. AFRC believes that some of our concerns could be addressed during Project implementation. This might include the harvest of more volume per acre within the range of effects analyzed in the EA and possibly including optional units for the purchaser's consideration depending on economic viability.

We look forward to following this Project into implementation. Should there be other objectors, AFRC would like to be included in the Resolution meeting. We believe it is appropriate to include all objectors and those who submitted NEPA comments in one Resolution meeting instead of holding separate meetings with each objector.

Sincerely,

Tom Partin
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