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Title:

Comments: District Ranger Gassman: Thank you for the opportunity to comment on the Proposed Action for the Pine Phlats Fuels Reduction Project. The Project Area lies both north and east of my property in Rawlings Tracts and the Project is timely. I have some general comments as well as some more unit specific comments for your consideration.

1. While the use of a HFRA Cat Ex is certainly appropriate, the 3,000-acre limitation of this tool appears to have resulted in leaving some areas untreated that should be included. Specifically, I refer to acreage north of the Bobtail Cutoff Road. Since this road is a main ingress/egress for both Bobtail and Pipe Cr. residents, the road should at a minimum have a shaded fuelbreak on both sides. Even better, the project area and treatments should be extended north and tied into the existing West Fork Fire burn scar. I propose dropping unit 37 in the lower SE corner of the Project Area and utilizing those 589 acres north of Bobtail Cutoff.
2. Most of the stands proposed for Improvement Cutting in this project were previously treated under the Kootenai River North Stewardship Project in the mid 2000's, the Pipestone Project in the 1990's and/or possibly a different project whose name I forget also in the mid 1990's. While I and others argued at the time, that those sales did not remove enough overstory to constitute a good fuels treatment, the fuels personnel on the District stated that what was prescribed and implemented was sufficient in terms of fuels reduction. In addition, these projects were overly concerned with wildlife habitat, specifically, both thermal and hiding cover for whitetail deer winter range. Hence there were leave islands of understory vegetation protected throughout the area. These should be slashed and piled along with the Doug fir/larch ingrowth that has come back in the openings created after the logging. The residual basal area in these stands is probably 60 to 80 square feet. While I would have removed more in the earlier entries, trying to go back now to remove a little more is just not economic as a commercial sale opportunity.
3. While I have not been in all the proposed Commercial Thin units, I suspect that while they may appear old enough and dense enough on paper to warrant commercial thinning, they contain mostly small diameter, bull pine trees, containing at most, one log. This is certainly the case in Unit 2, which I have walked through on more than one occasion. You will be hard pressed to find a commercial opportunity here as the best trees will be your leave trees. Trying to find a market for ponderosa pine is hard enough, but it's probably nonexistent for material of this size. The stand needs to be treated, but it may have to be on a non-commercial basis. I would also suggest taking a hard look at the stands west of Kootenai River Road and east of the powerline road as well as to feasibility of commercial thinning or improvement cutting. Most of these acres are composed of off-site ponderosa pine that has been unravelling for years. I suggest just clearcutting all of it and starting over. What's there will never amount to anything and will continue to fall apart. Opening those stands up any more will just contribute to more blowdown and leaning trees.
4. Unit 37 was last treated with the Sheldon Interface project in the mid to late 90's. Its intent was to reduce tree and crown densities in the Ponderosa pine to make them more resilient to insects and disease. As well, it provided some protection from fire in the Ponderosa Heights subdivision. I'm not sure opening this stand any further is a good idea and group selection units are a particularly bad idea. I suggest you spend some time in the Sheldon Mountain/Michal's Draw area looking for and examining the group selection units from the Sheldon Oak sale. They can be found as interspersed groups of dense advanced regeneration of Douglas Fir among the other acres of commercial thinning that was done there subsequently. They have never been tracked well, if at all and at this point just constitute ladder fuels. I could show you the same thing along Highway 2 from the junction with the Yaak River road to the state line. If you're not going to commit to tracking and managing these openings, I would not cut them. As stated above, use these acres in more high priority areas north of the Bobtail Cutoff. If

you insist on re-entering this stand, you should also examine the need for Borax treatment of larger diameter stumps to reduce the spread of *Fomes Annosus* root rot.

5. The whole Soil Restoration section of this proposal is not well thought out, nor practical. I spent many years at the Regional level working on Soil Quality Standards and operational controls. I thought we were well beyond the days of specifying maximum soil moisture percentages in documents and contracts and instead using tools such as machine selection, seasonal timing, requiring pre-flagging and approval of all skid trails and requiring skidding equipment to stay on designated trails. While most specialists look to restrict operation of logging equipment, it is quite often the subsequent fuels treatment equipment that causes significant soil displacement and compaction since it tends to operate across the entire unit with no controls on where it is allowed to go. This needs to be addressed.

Two items in this section raise some red flags for me. The first is the required use of cut to length machinery on slash mats in units 234, 301, 531, 532, 534, 535, 551 and 552. Unit 534 is a cable unit and Unit 552 is prescribed for hand slash and pile, so I am not sure why a forwarder and slash mat is prescribed. While this is a good idea, in theory, there may not be enough slash generated in an improvement cut to construct a usable, effective slash mat. In addition, most of these units call for machine piling following harvest, so you will have extensive machine use across most of these units unless you restrict the piling machines to the slash mats as well. In my experience, fuels personnel will also want to rip out and pile the slash mats which results in more disturbance as well as a bunch of dirty piles to burn. If used, slash mats should be left in place to decompose. They will be compact enough that they will not be a threat from a fuels standpoint.

The second red flag is the use of a grapple rake subsoiler. Has anyone on this forest ever observed the use of these machines and the result? I suspect not. I personally observed trials of this machinery 20 years ago on the Bitterroot NF. The first thing we discovered was the enormous horsepower required to pull the subsoiler through the ground. This resulted in having to use a very large excavator which negated the idea of being light on the land and contributed to more compaction. Secondly, in rocky soils (such as the glacial till we have here) and areas with numerous stumps (also the case here), the result was a torn-up mess. I do not advocate use of this machinery for soil remediation. I suggest that this entire section be reconsidered and rewritten. I would consider excavator scarification of skid trails where necessary and temporary road restoration as described in Region 1 timber sale contract C Provisions.

6. There are only 53 acres of cable/skyline yarding in this proposal and it is all in Improvement cuts. I suspect that this is not enough acreage or volume to make it economical to move a skyline machine into the area. You might be able to specify an excaliner (tracked line machine) or a tong throwing excavator to make this feasible, but it needs further examination.

7. Transportation Management - a. The document states on page 10 that an agreement with the county would need to be in place to use county roads for log haul and this agreement would need to be in place prior to project activities. Since when does the Forest Service need county approval to haul on public roads? I have never heard of this in the past and the Kootenai has hauled millions of board feet of timber over county roads in Pipe Creek and Bobtail Creek in the past without such an agreement. Are they planning to charge you for road maintenance as well? If so, I suggest you politely point them to the millions of dollars Lincoln County has received from the Forest Service under the 25% Fund as well as Secure Rural Schools. This money was intended for use only for roads and schools in Lincoln County.

b. What is the access to Unit 234? It would appear you are planning to skid this volume to the temp road in Unit 532. I am sure you are aware that Rd 5670 continues across the southeast corner of the private property north of Unit 234 and back to the NF boundary. Perhaps you could get an agreement from the landowner to use this short segment of existing road. This road was used when this unit was originally logged.

c. I would consider the use of "low standard specified roads" in lieu of temporary roads. This language, which is contained in a Region1 Special C Provision enables the Forest Service to specify the actual location of these roads as opposed to temporary roads in which the location is by agreement with the Purchaser. Specific design and restoration features can also be prescribed. These roads are also not included in the acreage of detrimental soil disturbance within a treatment unit as temporary roads are. This could help mitigate some of the soils issues described earlier.

d. What is the purpose of the temporary road construction proposed into Unit 704? This unit is listed as a precommercial thinning, so it should not need any road access for timber haul. In addition, there is an existing 2 track road that traverses the east side of this unit from its junction with Rd 5094 north to the junction with the road that accesses Noble's Pit. There is also an old road splitting this unit that runs east to west. This is more than sufficient for excavator access.

8. Prescriptions - It is hard to comment on a proposal without knowing the actual prescriptions that will be implemented. It's hard to tell what the economic impact of the Improvement cutting will be unless one knows what the target trees/acre or residual basal area is going to be. Hence, I am forced to just say I do not think these treatments are feasible economically. It would be helpful to state the difference between a clearcut with reserves and a clearcut with leave. I have never heard of a clearcut with leave, and it seems like you are splitting hairs making a distinction between the two. I commend you for including Unit 1 in this proposal, Even though it is only two acres, it is highly visible due to its location adjacent to both Highway 37 and Pipe Creek Road. This stand has been falling apart for years due to insects and disease in the Ponderosa pine. However, I disagree with the prescription for improvement cutting. This stand is beyond that. It is time to regenerate it. The prescription should be Clearcut with Reserves, with all the remaining Ponderosa pine removed.

9. Since there is nothing in the document that describes the actual tool to be used for implementation (timber sale contract, stewardship contract or stewardship agreement), my comments are focused on economic feasibility of the proposal that may be different depending on the actual implementation tool selected. Regardless of the tool, this will be an expensive undertaking and there is certainly not enough merchantable timber being removed to offset the cost. It would be helpful to know what type of funds the Forest plans to use to pay for the project and if this funding has been secured.