



VIA Email: comments-northern-idpanhandle-stjoe@fs.fed.us

April 9, 2019

Project Leader-Brebner Flat Project
St. Joe Ranger District
222 South 7th Street, Suite 1
St. Maries, Idaho 83861

Dear Project Leader:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Brebner Flat Draft EA.

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.

AFRC provided scoping comments on the Brebner Flat project on March 1, 2018. In the scoping phase the Forest was going to use the 3,000 acre Farm Bill CE, but has now chosen to use an Environmental Assessment to do the NEPA work. HFRA will still be used which allows the project to have an Action and No Action alternative. AFRC stated that we supported the three focuses of this project:

- Improve forest health and increase vegetation resilience to large disturbances such as severe fire and insect or disease outbreaks.
- Provide sustainable use of natural resources and benefits for local communities.
- Reduce hazardous fuels to lessen the severity of wildfires and to enable safe fire suppression efforts.

In our scoping comments, we submitted several recommendations that we thought would make the project better. Some of those recommendations included:

- **Treating up to the 3,000 acre limit.** AFRC supports using the 2014 Farm bill expedited measures to do forest health treatments in watersheds identified by the Secretary of Agriculture. Under this authority a total of 3,000 acres may be treated using the expedite process of a Categorical Exclusion (CE). AFRC recommends that the Forest treat a total of 3,000 acres mechanically in the 11,779 acres Brebner Flat project area to satisfy all three Purpose and Needs.

Unfortunately, the Forest has chosen to decrease the commercially treated acres by reducing the number from 1,948 acres down to 1,719 acres (or 15% of the project area). AFRC continues to believe this is a huge missed opportunity considering the forest health and heavy fuels issue in the project area and the amount of Wildland Urban Interface present as well. Management Area 6—General Forest (MA6) dominates the land use in the project area with 93% of the National Forest land being in this category thus supporting management activities.

AFRC is concerned that the Forest reduced the acres being commercially treated even though the project is now not being analyzed using the Farm Bill 3,000 acre CE.

- **AFRC outlined the importance of this project to the forest products industry in Idaho by stating:** 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.

By treating only 1,719 acres, AFRC does not believe the Forest has met the following social and economic goals and desired conditions of the 2015 IPNF Forest Plan:

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.

- **Need to reduce hazardous fuels.** AFRC outlined our concern that by not treating the full 3,000 acres allowed under the 2014 Farm Bill, we believe the Forest is not accomplishing the appropriate fuels reduction. There are many acres of Wildland Urban Interface within the bounds of this project and those resources should be protected. AFRC does not believe the Forest is taking advantage of lowering the risk to local residents, communities, and valued by decreasing the chances of uncharacteristic wildfire through reduction of fuel loads in the project area. The Forest is not achieving the following Hazardous Fuels goal.

FW-DC-SES-04: To the extent possible, the Forest contributes to the protection of communities and individuals for wildfire within the limits of firefighter safety and budgets.

AFRC's comments on the need for fuels reduction and Forests own purpose of the project "Reduce hazardous fuels to lessen the severity of wildfires and to enable safe fire suppression efforts" seemed to be ignored by choosing to reduce the number of acres being treated—thus you are not following the Hazardous Fuels goal outlined above.

- **Need to improve forest health and increase vegetation resilience.** A silvicultural description of the stands within the project area outlines the need for large-scale fuels treatments and for reestablishing early seral tree species. Further insect and disease issues as well as root rot disease makes the case for treating more than the proposed 1,719 acres. This lack of treatment fails to accomplish three Forest criteria:
 - FW-DC-VEG-01 which calls for more stands to be dominated by western white pine, ponderosa pine and western larch, and less of the forest dominated by grand fir, Douglas-fir.
 - FW-OJB-01, and FW-DC-VEG-06 both of which call for having more resilient forest conditions.

AFRC continues to support the Forest in requesting Forest Plan Amendments to make the needed treatments on the land. These treatments are viewed as short-term impacts that would provide long-term benefits. Those Forest Plan amendments include:

- A reduction in elk cover to promote elk forage. The proposed harvest may reduce vegetation to the extent that elk habitat and security is decreased in the short-term,

but long term greater amounts of early seral forage habitat over a broader area would be created.

- The proposed plan calls for creating 17 openings larger than 40 acres to treat the poor forest health conditions. Seed tree, shelterwood and clearcut harvests with or without reserves which will create openings in order to regenerate even-aged or two-aged stands in one harvest operation will be utilized. These larger openings are needed to accelerate forest health.

AFRC continues to support the proposed Road and Travel plan which calls for the construction of 2.5 miles of new system roads and approximately 4 miles of temporary roads. We also support leaving the permanent roads for future administrative use. AFRC suggests the Forest look closely at the proposed decommissioning of temporary roads to see if they have future value for administrative use rather than using a blanket policy of recontouring these roads back to a natural state. AFRC believes that for every segment of road decommissioned, the Forest Service should be able to illustrate that the potential resource damage risk outweighs the future access value of that particular road segment. This access value includes factors such as vegetation management, fire suppression, and recreation use.

At our recent AFRC monitoring meeting held with the Idaho Panhandle National Forest on March 4, 2019 we discussed the importance of treating as many acres as possible in a project area to not only improve forest health over a larger landscape, but also to help with the efficiencies of preparing and EA. The cost of preparing an EA can easily exceed \$1 million dollars, thus the Forest should get as much benefit from the document as possible. We also discussed the importance of the Forest talking to the forest products industry about what type of material sawmills can use to make products in their plants. For example, a discussion about how some acres were bypassed because Forest personnel didn't think the industry could use mountain hemlock, when in fact that species is used by sawmills to make their white wood products. Therefore, we ask the Forest to take a second look at each acre to see what treatments are needed and can be done while making this entry.

AFRC supports the three focuses of this project, and outlined reasons for the treatments. However, AFRC is very disappointed that the Forest did not consider any of our scoping comments submitted on March 1, 2018 and actually reduced the footprint of the acres being mechanically treated. Further, by not using the Farm Bill 3,000 CE there was no compelling reason to limit the acres being treated in this entry.

We appreciate that this project will result in a timber sale that will provide about 23 million board feet of timber with a present net value of about \$2 million, and will also contribute an estimated 67 jobs per year during the life of the project. However, AFRC and our members believe the project could have and should have been larger and treated more acres. As a partner in providing input to each of your projects and a partner in your effort to increase the pace and scale of management on the Idaho Panhandle National Forest, it is disappointing that none of our suggestions were included in the Draft EA and actually the project size was reduced.

Thank you for the opportunity to provide comments on the Brebner Flat Project. I look forward to following the implementation of this project as it moves forward.

Sincerely,

A handwritten signature in cursive script that reads "Tom Partin". The signature is written in black ink and is positioned below the word "Sincerely,".

Tom Partin
AFRC Consultant
P.O. Box 1934
Lake Oswego, Oregon 97035