



VIA Email: dcobb@fs.fed.us

April 3, 2019

David Cobb
Project Leader
Sandpoint Ranger District
Idaho Panhandle National Forest
1602 Ontario Street
Sandpoint, Idaho 83864

Dear David:

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

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 appreciates the opportunity to submit these comments during the pre-scoping period. Our intent with this submission is to provide a perspective from AFRC and our industry members on how this project could be fashioned to make it economically feasible and resource beneficial. The Buckskin Saddle project is located about 2 miles southwest of Clark Fork, Idaho. The project area encompasses approximately 56,000 acres which includes Granite Creek, Johnson Creek, and other small tributaries to the lower Clark Fork River and Lake Pend Oreille. The focus of this project is to make the stands within the project area more resilient to disturbances such as drought, insects, disease, and wildfires. 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.

The Forest has identified the following issues that are very important in developing the Purpose and Need for this project. Those include:

- Changing Forest Vegetation to Improve Landscape Resiliency.
- Forest condition and stand structure are well outside of the historical range for the landscape.
- The current and historic range of variability are out of balance. The percentage of fire resilient species such as white pine, ponderosa pine and western larch is below historic level while grand fir/cedar and western hemlock are far above natural ranges.
- Mature high risk forested conditions are currently observed across over 60 percent of the project area which is well above historic conditions.
- Biophysical conditions are out of balance regarding warm/dry and warm/moist forests.

Other key factors found in the project area includes that over half of the project landscape is composed of mature overstocked forests dominated by Douglas-fir, grand fir, western hemlock, and lodgepole pine. These stands have replaced stands of white pine, ponderosa pine and western larch. Further, three quarters of the project is susceptible to epidemic levels of tree mortality within 10-15 years. There is an elevated level of root rot disease which is prevalent within the Grand fir and Douglas-fir dominated stands. Lodgepole is also susceptible to bark beetles because of overcrowding and poor forest health conditions. Finally, aspen stands have been crowded out by coniferous species and need to have overstory trees removed.

With the above discussion of conditions found in the Buckskin Saddle project, AFRC offers the following comments that we believe will help as you get into the formal scoping and Draft EA process.

1. AFRC encourages the Forest Service to commercially treat as many acres in the project area as possible. There is 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 needs 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. 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 a 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 hard look at each acre to see what treatments are needed and can be done while making this entry.
3. AFRC strongly supports the proposed regeneration treatments in the timber harvest units. There is a need to regenerate portions or all of 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. Our members depend not only on a near-term supply of timber but also on the understanding that that supply will be available in the long-term. AFRC has voiced our concerns in the past regarding the sustainability of a vegetation management paradigm comprised exclusively of thinning and have repeatedly stressed the importance of incorporating a regeneration component into this paradigm. We urge the Sandpoint Ranger District to consider incorporating the objective of sustained-yield timber management into the project's purpose & need statement to capture this important aspect of your management plan and the Forest Service's overall mission.

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.

4. AFRC believes the Forest should take this opportunity to do a commercial harvest next to all adjacent landowners using either commercial thinning to wide spacing leaving 40 sq. ft. of basal area per acre, seed tree, shelterwood or regeneration harvest to reduce the risk of wildfire or insects and disease spreading onto adjacent property. The heavy buildup of fuels on Forest Service lands need to be reduced throughout the project area, but especially where these lands adjoin private ownership.
5. 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.
6. 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.
7. During our summer AFRC field trip in 2018 we looked at the possibility of using tractor logging on slopes over 35%. 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 of ground based equipment on slopes up to 45 percent 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 pre-scoping comments on the Buckskin Saddle Project. I look forward to following the implementation of this project as it moves forward.

Sincerely,

A handwritten signature in blue ink that reads "Tom Paul". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tom Partin
AFRC Consultant
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