



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

August 6, 2018

Doug Nishek, Camp Robin Project Leader
Bonners Ferry Ranger District
Idaho Panhandle National Forest
6286 Main Street
Bonners Ferry, ID 83805

Dear Doug:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Camp Robin 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 project area is about 42,000 acres and is located in the Camp Nine and Robinson Lake areas beginning five miles north and east of Bonners Ferry and extending approximately 10 miles north. The project boundary is the National Forest Boundary on the south, west, and north, hence it borders a substantial amount of private land and Wildland Urban Interface (WUI). The Camp Robin Project is also part of a broader Collaborative Forest Landscape Restoration Program (CFLRP) proposal occurring in the lower Kootenai River watershed.

AFRC submitted scoping comments on this project on January 15, 2018. At that time many of our comments focused on the fact that AFRC didn't believe that the Forest could achieve its stated goals by treating so few acres. Those concerns are still very relevant in the Draft EA.

AFRC supports the Purpose and Need (listed below) for this project which was developed by the Forest and incorporated management suggestions put forth by the Kootenai Valley Resource Initiative (KVRI) and Boundary County, in which the project area lies entirely within their WUI. Those include:

- Reduce wildfire risk to the local communities and surrounding federal lands and protect critical infrastructure and primary egress routes.
- Maintain and improve forest landscape resiliency by providing for tree species stocking levels and landscape patterns, which better resist insects, disease, and stand-replacing wildfire(s).
- Promote the long-term persistence, resilience, and stability of wildlife habitat and biodiversity by trending toward an ecosystem composed of vegetation communities that more closely resemble those found historically while contributing toward the recovery of Threatened and Endangered wildlife species.
- Maintain and improve recreational sites and experiences in the Camp Robin area because of the high (and increasing) demand for both motorized and non-motorized activities and places to recreate safely.
- Contribute to the social and economic well-being of local communities by promoting sustainable use of renewable natural resources.

While we support the purpose and need for this project, AFRC does not believe the Forest is meeting the purpose and need as pointed out in Draft EA and we offer these additional comments which we believe will better achieve the goals of this project.

1. In our scoping comments, AFRC noted that the total project area is 42,000 acres, but the plan is to only commercially treat 6,198 acres mechanically and another 476 acres with prescribed burning or precommercial thinnings. This totals less than 15% of the project area. The Forest has now reduced the commercial harvest acres to 5,805 a further reduction of 393 acres.

AFRC does not believe this project as outlined satisfies the vegetative part of the Purpose and Need which calls for:

- Develop and maintain stand compositions and structures associated with low crown fire potential by managing for fire resistant seral species such as western larch and ponderosa pine.
 - Regenerate stands that are at risk of root disease and bark beetle infestations. Establish western larch, western white pine and ponderosa pine seedlings in these areas as appropriate.
 - Manage mature stands with desirable species composition in a way that facilitates the development of desirable older forest structure.
2. The two tables below (14 and 15) outline how inadequate the treatments will be for reducing the rate of spread and potential crown fire activity.

Table 14. Acres of potential rate of spread over or under 5 chains/hour burning under severe conditions within the Camp Robin Project Area by alternative

| Alternative | Rate of Spread less than 5 chains/hour | Rate of Spread greater than 5 chains/hour |
|-------------|--|---|
| 1 | 22,850 acres | 19,429 acres |
| 2 | 25,089 acres | 17,190 acres |

Table 15. Acres of Potential Crown Fire Activity under Severe Conditions within the Camp Robin Project Area

| Alternative | Acres of Surface Fire | Acres of Crown Fire |
|-----------------|-----------------------|---------------------|
| No Action | 12,279 acres | 29,511 acres |
| Proposed Action | 17,334 acres | 24,945 acres |

By treating so few acres these two tables point out that the Forest is NOT meeting its first and third purpose and need which are:

- *Reduce wildfire risk to the local communities and surrounding federal lands and protect critical infrastructure and primary egress routes.*
- *Promote the long-term persistence, resilience, and stability of wildlife habitat and biodiversity by trending toward an ecosystem composed of vegetation communities that more closely resemble those found historically while contributing toward the recovery of Threatened and Endangered wildlife species.*

In reviewing the project map there appears to be at least 15 miles of WUI areas that abut this project. AFRC does not believe the proposed action satisfies the needs defined in the Bonner County WUI. The project has the potential of reducing thousands of additional acres in the WUI that are next to private lands. With the catastrophic wildfire history this area has witnessed over the last two years, AFRC believes that more aggressive fire reduction/fuel reduction measures should be taken to benefit the Forest and adjacent landowners.

3. Further, the forest stand composition within the Camp Robin project area is dominated by Douglas-fir, grand fir, lodgepole pine, western red cedar, and western hemlock. There is a need to increase the number of acres of shade intolerant and fire and drought tolerant species across the landscape, such as western larch and western white pine. Western larch and western white pine are also less susceptible to native insect and disease problems. Increasing these tree species would increase forest health and resiliency, reduce insect and disease hazard, and provide greater flexibility and options for future fire management.

Table 1 below outlines the mechanical treatments proposed for the project:

Table 1. Alternative 1 & 2 Silvicultural Treatments

| Silvicultural Treatment | Alternative 1 (acres) | Alternative 2 (acres) |
|------------------------------------|-----------------------|-----------------------|
| Regeneration Harvest Prescriptions | N/A | N/A |
| Shelterwood with reserves | 0 | 1450 |
| Seed Tree with reserves | 0 | 1713 |
| Clearcut (US 95 ROW clearing) | 0 | 10 |
| Sub-Total | 0 | 3173 |
| Intermediate Harvest Prescriptions | N/A | N/A |
| Commercial Thinning | 0 | 1082 |
| Improvement Cut | 0 | 596 |
| Single Tree Selection | 0 | 38 |
| Variable Density Thinning | 0 | 916 |
| Sub-Total | 0 | 2632 |
| Total Commercial Harvest | 0 | 5805 |

Again, by only mechanically treating 5,805 acres (14% of the land base), AFRC does not believe this project will accomplish two more of the purpose and need which are:

- *Maintain and improve forest landscape resiliency by providing for tree species stocking levels and landscape patterns, which better resist insects, disease, and stand-replacing wildfire(s)*
- *Contribute to the social and economic well-being of local communities by promoting sustainable use of renewable natural resources.*

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.

4. AFRC continues to be very concerned about the Forest proposing six mmbf of helicopter logging. AFRC reminds the Forest that helicopter logging is expensive, and the availability of ships to do the work is also problematic. There are only a few available helicopter logging companies, and during summer months when logging can be the most productive, most of the companies have firefighting contracts and their ships are not available. AFRC suggests revisiting the proposed helicopter units to assess if using

mechanized ground skidding equipment or skyline in the proposed helicopter units could be an option. Another approach may be to make helicopter units optional based on the availability of helicopters, their cost, and the current economics of local lumber markets. It has also been our experience that allowing longer operating seasons for helicopter logging might assist in getting the work completed.

Further, AFRC visited the A-Z project on the Colville National Forest on July 17 and toured a unit being logged by helicopter. AFRC member Vaagen Brothers Lumber outlined the same concerns that we mention above. Also, the appraised prices for helicopter logging is significantly below what is currently being paid to complete similar work.

One other option could be to use tractor skidding or tethered logging on slopes over 35% to more efficiently capture the economic value of the timber and to provide more revenues back to the Forest for other resource improvements. The Colville National Forest is testing skidding on slopes up to 45%-70% using tethered systems. Additionally, many acres have been bypassed in the past because of concern about damage to soil from compaction, erosion and other issues. Today's new high-tech logging equipment has a very light footprint and damage to the soil resource is minimal. On a recent field trip to the Red Beauty and Fern Hardy timber sales, there was a lot of discussion of tractor skidding on slopes over 35%. AFRC suggests trying this method in areas of this project.

5. AFRC supports the creation of 3,084.4 acres of patches of early seral vegetation (even-aged regeneration harvest openings) over 40 acres in size that would be created by the proposed action. AFRC supports obtaining a Forest Plan Amendment to complete this work.
6. AFRC supports the plan for maintaining 54 miles of road, reconstructing 10 miles of road, and building 13 miles of temporary roads. AFRC also supports putting roads into storage by blocking them off rather than road obliteration. The public has invested a lot of money to get these roads in place and they should be left for future access for management, fire access or recreation.
7. AFRC suggests looking more at the use of DXP for any commercial thinnings. We believe that better results can be achieved in a much more efficient and cost effective manner by utilization of basal area thinning. Many Forests are now using DXP almost exclusively.

In closing AFRC recognizes that there is a lot of support from the Kootenai Valley Resource Initiative, Boundary County, and other parties for this project to move forward. AFRC's largest complaint is not the type of work proposed, but rather the quantity of acres being treated and the prescriptions of work being done. With so much consensus that work needs to be done in this area, and with the CFLRP program possibly coming to an end in 2019, AFRC strongly believes this project should be much larger to maximize the acres being treated.

Thank you for the opportunity to provide comments on the Camp Robin Project Draft EA. 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
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