



**Via email:** [comments-northern-idpanhandle-coeur-dalene@fs.fed.us](mailto:comments-northern-idpanhandle-coeur-dalene@fs.fed.us)

September 27, 2018

Project Leader-Potter's Wheel Project  
Coeur d'Alene River Ranger District  
Idaho Panhandle National Forest  
2502 East Sherman Avenue  
Coeur d'Alene, Idaho 83814

Dear Project Leader:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Draft EA for the Potter's Wheel 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 Potter's Wheel Project area lies about 35 miles northeast of Coeur d'Alene and covers approximately 29,000 acres with 98% of the land base classified as general Forest Management Area 6. This land classification offers a great opportunity to manage the Forest for forest health, provide wood products to the local communities and infrastructure and improve riparian and aquatics health.

On November 17, 2017 AFRC provided comments to this project from which we will refer to later. Included in our comments was the fact that we supported the purpose and need for the project which included:

- Establish and maintain resilient forest stand structure and species composition
- Contribute economic benefit to local communities and the general public, by providing forest products to market
- Improve water quality and aquatic habitats

Unfortunately, many of the comments we provided during the scoping process for this project were not implemented in the Draft EA, thus AFRC does not support the action for several reasons.

1. First, AFRC commented that to better meet the purpose and need for this project, more than 5,030 acres of commercial harvest is needed, especially when 98% of the project area is in the MA-6 designation. Treating a larger footprint during this entry will better accomplish the stated purpose and need. In the Draft EA the mechanically treated number of acres actually went down to 4,995.

The Forests rationale for this in the Draft EA was “*accounting for the acres of land that are currently unavailable for harvest there are approximately 18,213 acres designated as MA-6 that may be available for harvest. The proposed action would treat 4,995 acres with commercial harvest or 27% of the acreage that may currently be available for harvest. We believe that the proposed action would treat a reasonably large “footprint” within the acreage that is currently available for commercial timber harvest at this time.*”

AFRC does not believe that this rationale meets the purpose and need for this project and specifically does not address the issues raised in the scoping document with includes:

- Fire has been absent across the landscape since the 1910 fires.
- The current species composition of the forest, both at stand and landscape levels, deviates from desired conditions identified in the Forest Plan (FW-DC-VEG-01). Long-lived insect and disease-resistant and fire resilient species, including western white pine, ponderosa pine, western larch, and western red cedar, are lacking within the project area. In fact, less desirable species such as Douglas-fir, white fir, and hemlock are dominant across 70 % of the landscape and present in the remaining 30%.
- The potential for large-scale wildfire is high in the area due to the heavy fuels. The Forest witnessed what can occur during the Tower/Grizzly fires.
- The sawmill infrastructure is deficit for wood supply and some mills are running on curtailed shifts or shortened hours. Sawlogs from this project is very important to help maintain the existing infrastructure and perhaps create more jobs if more volume is removed from this project.

2. Specifically, the purpose and need for the project is not met in the following ways:

- **Establish and maintain resilient forest stand structure and species composition**—this purpose and need is not being met when only 27% of the acres available for treatment are being treated. This is especially significant when your document specifies that less desirable species such as Douglas-fir, white fir, and hemlock are dominant across 70% of the landscape and present in the remaining 30%. The EA states that since the area has not seen fire since 1910 there is a large threat for stand replacement fire across the project area. Again, this begs the question why the Forest is only doing harvest or fuels reduction treatments on 6,707 acres. Region 1 has seen an incredible amount of wildfire in recent years including the Grizzly/Tower complex on the Panhandle in 2015 and over 700,000 acres burned on National Forest lands in Montana in 2017.
- **Contribute economic benefit to local communities and the general public, by providing forest products to market**—this purpose and need is not being met by

only treating 27% of the available acres for harvest. The cost to do an EA and the analysis involved beckons to the fact that more acres should be treated to help offset those costs. AFRC provided solid comments in our scoping document that supports more commercial harvest, “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. Specifically, studies in Idaho have shown that 18 direct and indirect jobs are created for every one million board feet of timber harvested. 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.”

- **Improve water quality and aquatic habitats**—in the Draft EA the Forest contends that there are about 5,966 acres of riparian habitat conservation area (RHCA) that intersect MA-6 within the project area; RHCAs are not lands suitable for timber production. AFRC provided documentation in our scoping notice that management in the RHCA can actually benefit both the quality of water and vegetation. I did not see where the Forest actually considered the following scientific studies:

*Stream temperature*

Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management*, 270, 302-313.

Key points of the Janisch paper include:

- The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature.
- Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.

*Riparian reserve gaps*

Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old-growth versus early-mature riparian forests in western Oregon. *Aquatic Sciences* 75:547-558.

Key points of the Warren paper include:

- Canopy gaps were particularly important in creating variable light within and between reaches.

- Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests.

*(1) Small Functional Wood*

Nearly all wood that falls into stream channels has the capacity to influence habitat and aquatic communities (Dolloff and Warren, 2003). Therefore, smaller woody material that enters stream channels is important to overall channel function because it can store sediment and organic material, contribute nutrients, and provide temporary pool habitat and slow-water refugia. It is important to note, however, that pools formed by smaller wood generally are not as deep or complex as those formed by large wood. In addition, small wood does not persist for long periods of time because it deteriorates quickly and is more likely to be flushed from the system (Naiman *et al.*, 2002, Keim *et al.*, 2002).

(2) In smaller streams adjacent to previously harvested stands, field surveys (McEnroe, 2010) indicated that relatively large amounts of existing (in-stream) and potential (standing) small functional wood are present. Field surveys also indicate that the vast majority of the down wood in these areas originated from within 50 feet of the stream channel. This is consistent with findings by Minor (1997), who found that in second-growth coniferous riparian forests, 70-84 percent of the total in-stream wood was recruited from within 15 meters (49 feet) of the channel. In addition, McDade *et al.* (1990) and Welty *et al.* (2002) found that 80 percent and 90 percent, respectively, of the wood loading occurred within 20 meters (66 feet) of the stream channel in coniferous forests.

3. By treating only 4,995 acres in this project the Forest is not achieving one of its purpose and need which is to **Establish and maintain resilient forest stand structure and species composition**. In your document you outline that *“The forest wide desired condition for the white pine and western larch cover types range from 30 to 60% of the forested acreage of the IPNF in combination. For the warm/moist biophysical setting the combined desired range of white pine and larch is 42 – 85%. The proposed action would effectively begin to move the amount of white pine and western larch dominance within the Potter’s Wheel project are towards the desired conditions. **While the proposed action will “move the needle” in a positive direction it will not fully achieve the desired conditions in and of itself because the shift of species composition over the last century has been more significant in scale than can be restored in one activity entry.**”*

AFRC believes that the Forest should do more not only on this project, but on every project that you analyze to do more than just move the needle—you should treat larger portions of the project area. The Forest is leaving the other 73% of the project area subject to unhealthy stands and catastrophic wildfire conditions created by heavy fuel loadings.

4. AFRC continues to support the creation of openings larger than 40 acres during this entry by attaining Regional Forester approval. The proposed harvest activities are planned to utilize clearcut, seed tree, and shelterwood harvests with or without reserves which are intended to create openings in order to regenerate even-aged or two aged stands in one harvest operation. As a result, 28 of the 37 proposed harvest units would be larger than

40-acre openings, either due to proposed unit size or as a result of existing adjacent openings.

Forest Service policy (FSM 2471.1) directs land managers to normally limit the size of harvest openings created by even-aged harvesting methods to 40 acres or less. However, exceptions to the 40-acre opening limitation are allowable with Regional Forester approval. A request to exceed the 40-acre size limitation on specific regeneration harvests will be made in accordance with FSM 2470.1, as described by Section 6 of the National Forest Management Act.

The result of these openings would be of benefit to the elk herds on the Forest as per the Draft EA, *“the small amount of openings currently existing limits the amount of forage available. Under the proposed action, the creation of openings would increase the amount of forage habitat for elk and other big game species and trend towards desired conditions for both wildlife and vegetation.”*

5. The Forest has opted to not do any forest health treatments in existing old growth stands. That being said, AFRC is baffled by your discussion on how not managing in old growth stands will improve forest resiliency. *“Indirectly, the resilience of existing old growth stands to future fire disturbances would be improved compared to the existing conditions. The proposed vegetation management activities would reduce the potential future flammability of the stands proposed for harvest. Where proposed harvest activities are neighbors with existing old growth stands the reduced flammability in the harvested sites would reduce the risk of future fires spreading into the old growth stands from the adjacent stands.”*

In AFRC’s opinion, the only way to ensure healthier old-growth stands is to manage them, thin them out and fire proof them. Hoping that treating adjacent stands will protect the unhealthy, fire prone old-growth stands is just ludicrous.

6. AFRC continues to support the construction of 11.0 miles on new permanent road and 7.5 miles of temporary roads. These roads will be designed to limit impacts to other resources such as aquatics. Newly constructed or reconstructed roads do not encroach into streams and riparian areas in ways that impact channel function, geometry, or sediment delivery. Roads in intermittent stored service pose minimal risks to water quality and aquatic ecosystems. Drainage structures have a minimal risk of failure and provide adequate drainage that prevents accelerated runoff, erosion, and sediment delivery to streams.

Again, AFRC asks the Forest to do one more analysis on temporary roads that are scheduled for decompacting, recontoured to the approximate shape of the surrounding terrain, and seeded or covered with logging slash or other debris to prevent erosion and accelerate hydrologic and vegetative recovery. The reason for one more analysis is that significant resources will be used for the building of these temporary roads, and if they might be needed for further entries, fire access or recreation, then perhaps they should not be recontoured and taken out of use.

7. AFRC supports active management in Unit 82 which is in the proposed within the Tepee Roadless Area. The 102-acre unit (representing approximately 2% of the roadless area)

includes 56 acres of shelterwood harvest with reserves followed by underburning (to prepare the harvest area for planting and to reduce the density of shade-tolerant ingrowth) and planting 200-300 rust-resistant western white pine per acre to supplement anticipated natural regeneration of western larch and Douglas-fir.

8. The estimated volume that will come from this alternative is about 95 mmbf as per the chart on page 39. (See below). This volume is approximately what the Idaho Panhandle would like to ramp up to and sell on a yearly basis beginning in FY'21. If this project was increased in size as AFRC recommends, perhaps 1 1/2 to 2 years of harvest could come from this area thus making the dollars put into planning more effective.

**Table 14. Project feasibility and financial efficiency summary (2015 dollars).**

<b>Measure</b>	<b>No Action</b>	<b>Proposed Action</b>
Estimated timber volume (CCF)	0	190,337
Base rates (\$/CCF)	0	22.21
Appraised stumpage rate (\$/CCF)	0	24.26
Predicted high bid (\$/CCF)	0	29.91
Total revenue (\$)	0	4,597,000
Timber Harvest & Required Design Criteria - PNV (\$)	0	517,000

In closing, AFRC continues to be disappointed with projects such as Potter's Wheel where only 27% of the available timbered land base is being treated. As pointed out above, the cost of doing an EA is in the hundreds of thousands of dollars and the Forest needs to maximize the acres treated in that document. That is the only way the Forest will get to the needed pace and scale to address all of the forest health and fire issues facing the Idaho Panhandle National Forest with the current budget structure.

Thank you for the opportunity to provide comments on the Potter's Wheel Draft EA. I look forward to following the implementation of this project as it moves forward.

Sincerely,



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