



**VIA Email:** mlithgow@kalispeltribe.com

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Dear Gayne, Deanne and Ken:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment during the pre-scoping period on the Sxwuytn "Trail"-Kaniksu Connections Project (Kaniksu Connections).

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 Colville 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 Kaniksu Connections Project is a forest and watershed restoration project that spans multiple land ownerships and boundaries located in Pend Oreille County in northeastern Washington State, north of Newport. The planning area is approximately 90,700 acres and includes tribal, state, federal and private lands. The various acreages by landowners within the Project area

includes: Colville National Forest, 41,600 acres (46%), Private Lands 37,000 acres (41%), Kalispel Tribal Lands 3,700 acres (4%), Washington DNR managed trust lands 8,200 acres (9%), and Washington Department Fish and Wildlife 200 acres (<1%).

The goals of the Kaniksu Connections Project are to work with each other, and across property boundaries to sustain our forests, watersheds, and other ecosystem benefits into the future. Ecosystem benefits to be examined include: forest resiliency to extreme weather events, providing clean drinking water, maintaining and improving clean air, providing wood products, maintaining social and cultural values, and providing jobs and support for the local economies.

AFRC supports the goals of the Kaniksu Connections Project and offers the following suggestions as you move forward in your scoping.

1. AFRC members rely on the many landowners who are involved in this project to source the raw materials they need to run their operations. With that in mind, we believe it is very important to treat as many acres within the 90,700 acre planning area as possible during this entry for not only a sustainable supply of timber in the short-term, but also to ensure healthy forests in the future by reducing the risk of catastrophic stand replacement wildfires and to improve forest health by thinning the stands to reduce the risk of insect and disease.

AFRC believes that harvesting timber to create jobs and maintain existing infrastructure should be part of the purpose and need for this project. AFRC has several members that depend on timber from the Colville National Forest for their resource needs. 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. AFRC members take a variety of log types and sizes. The Kaniksu Connection Project has a diverse group of age classes and timber types that should be managed to provide the variety of wood needed by AFRC member sawmills.

Further, in this diverse landscape there is a considerable amount of work that needs to be completed during and following harvest. This work can only get done if there are enough timber receipts from the project to accomplish this work. By putting more timber up for harvest, the Forest will receive more revenues to accomplish the restoration work as outlined.

- AFRC believes that much of the work in the project area needs to be done on the Colville National Forest. This is especially pertinent since 46% of the project area is within National Forest Lands and as the graph points out, 42% of Forest Service lands in eastern Washington needs active restoration.

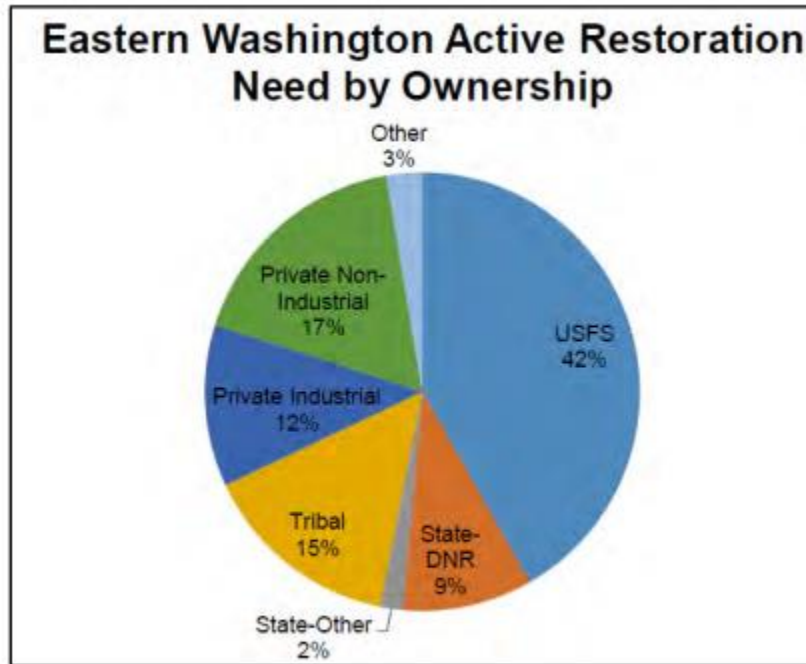


Figure 7. Restoration Needs for Eastern Washington from 20-Year Forest Health Strategic Plan (Haugo et al. 2015) <https://www.dnr.wa.gov/publications/>

- The Kaniksu Connection Project is closely following the blueprint laid out in the DNR's 20-Year Forest Health Strategic Plan. The first step has been accomplished which is to identify a planning area within a HUC 5 watershed that has the forest health problems and needs for management. The second step is now underway which is to conduct a landscape evaluation for the planning area. In this step an assessment needs to be made as to how "out of whack" this landscape is by comparing current conditions to reference conditions. AFRC believes this assessment should be done on all land ownerships within the planning area. Finally, step three is the development of a landscape prescription which AFRC believes should cover all land ownerships but must be in alignment with the individual landowner/manager objectives. This landscape prescription can be used to coordinate, guide, and accelerate the Forest Service NEPA planning and DNR and WDFW treatment priorities, according to landowner objectives, as well as inform private and tribal management. This is critical that while addressing forest health issues for forest resiliency is the overarching goal, each landowner/manager also has their own objectives and mandates to address specific to the lands they manage. This landscape prescription could be the basis for packaging treatments together for potential funding requests to the state legislature for treatments on DNR managed trust lands, WDFW lands, and small private landowner assistance programs.

AFRC believes that to accomplish buy in from both large industrial private and smaller private timber land holdings, some incentives such as stewardship dollars or state funding might need to be given to these landowners to encourage them to get the forest health work done. Specifically, addressing funding needs to encourage more small private forestland owners to address forest health issues on their land is likely to be required for success. Again, reviewing the map there appears to not be a lot of landowner assisted projects that are current, and perhaps those programs could be expanded to incentivize private landowners to get needed work done.

4. In reviewing the map showing past activities in the Kaniksu Connection project area there appears to be a real need to do more management on both Forest Service and DNR managed trust lands that are adjacent to industrial and non-industrial private lands. It should be incumbent on public timber managers to reduce the risk of wildfire and curb the possibility for insect and disease outbreaks on their lands which could affect adjacent private lands.
5. AFRC encourages the Forest to use silvicultural treatments that will thin stands to wider spacings for increased residual tree vigor, reduced fuels loading, and improved habitat for wildlife. During recent AFRC field trips to look at stands following harvest on the Colville, it was often the consensus within the group that more trees should have been removed. As you develop the Project, AFRC encourages the Forest to put direction in the EA to thin to wider spacings.
6. AFRC believes that it is imperative to treat overstocked Riparian Habitat Conservation Areas (RHCAs). These areas have been some of the most severely burned areas during the wildfires in recent years. The Colville Tribe developed a PowerPoint presentation showing the intensity of burn in riparian areas on their lands during the North Star fire of 2015. Most of these acres had not been treated, thus demonstrating the need for active management in the RHCAs.
7. AFRC encourages the Forest to use a variety of silvicultural prescriptions in this project to accomplish additional resource needs. For example, in some of the stands heavily impacted by insects and disease, regeneration harvests might be considered to establish new healthy stands. Where wildlife forage is needed again regeneration, shelterwood, or seed tree harvests might be used to improve and increase early seral vegetation. Finally, to promote fire resistant species in areas of dense stands, shelterwood or seed tree harvests could be utilized to leave species such as western larch, ponderosa pine or white pine to help establish young stands of these fire resistant species.
8. There is a huge opportunity to use retained receipts or K-V funds from the harvest of timber on this Project to improve many of the other resources that have been mentioned including the installation of new culverts or possible road relocation to prevent potential road failures or stream sedimentation. There will be a need for thousands of acres of precommercial thinnings, prescribed burnings, and other treatments as well that could be funded by these timber receipts

9. AFRC supports the use of Designation by Prescription for this project (DxP). At a recent purchasers meeting, Forest personnel asked if industry favors the use of DxP and the answer was overwhelmingly positive to using this tool. This would be an excellent project for DXP inclusion.
10. AFRC suggests allowing new ground based equipment methods such as tethering to operate on slopes over 40% specifically on the public timber lands. Private land operations are already employing the use of this new equipment which is more efficient and more economical. The Forest Service has traditionally proposed tractor and skidder yarding would be limited to slopes less than 35%. Short slope lengths may be steeper. Feller bunchers, harvester-forwarder systems, and other tracked heavy equipment would be limited to slopes less than 40%. Tethering and other techniques have been used extensively on slopes over 40% and should be considered.
11. The Colville has on its 10-year plan the concept of fuel breaks along strategic roads within the Colville National Forest. AFRC supports this concept and suggests that these breaks be included as part of the Kaniksu Connections project. At a minimum, these breaks should be 300 yards wide on either side of those roads. The stands within those fuel breaks should be thinned to a wide spacing and low basal area to reduce the threat of a crown fire going through the area. The purpose of the fuel breaks is to get the fire to lay down on the ground for suppression purposes. This tool could also be promoted on other ownerships to both provide safety corridors and reduce the risk of catastrophic wildfires spreading to larger areas.

Thank you for the opportunity to provide scoping comments on the Kaniksu Connections Project. I look forward to following the implementation of this project as it moves forward to the formal scoping period.

Sincerely,



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