



**VIA Email:** [comments-pacificnorthwest-colville-newport@fs.fed.us](mailto:comments-pacificnorthwest-colville-newport@fs.fed.us)

January 30, 2019

Gayne Sears  
District Ranger Newport-Sullivan Lake Ranger Districts  
Colville National Forest  
315 N. Warren Ave  
Newport, WA 99156

Dear Gayne:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment in the pre-scoping phase on the Sweet-Ione Integrated Resources 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 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 Sweet-Ione Integrated Resources project is approximately two miles west of Ione, Washington in Pend Oreille County and encompasses approximately 30,000 acres. The reason this area is being analyzed is because some portions of the forest have departed from healthy, resilient conditions with some areas being overstocked and dense with a lack of a diverse understory. In addition, some roads are susceptible to slumping, and culverts are undersized and contributing to potential road failure. In other areas, forest health habitat and watershed conditions are healthy and properly functioning.

By treating stands within this area, the Forest hopes to address those areas that are not healthy, improve forest habitat (e.g., increase diversity and improve forest health) increase forest resilience to disturbance (e.g., insect and disease, wildfire), improve watershed function, contribute to the local economy and stability of rural communities, and provide a sustainable road system.

AFRC believes that it is important to comment during this pre-scoping phase for several reasons and would like the Forest to consider these comments as you develop a Purpose and Need for the Project, and a plan of action for moving forward. AFRC also believes that the only significant changes that outside parties can make to the Project design as it develops is during the pre-scoping and scoping phase.

1. 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 Sweet-Ione Integrated Resource 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, the Forest has outlined a considerable amount of work that needs to be done 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.

2. AFRC would like to see the Forest maximize commercial treatments during this entry into the 30,000 acre project area. The cost of developing an Environmental Assessment is very high, thus the Forest should offset these high costs by maximizing acres treated, removing more merchantable timber volume, and restoring more of the resources within the project area from the timber revenues.

Further, large wildfires have been prevalent on the Colville National Forest in recent years, and this Project presents a great opportunity to reduce the fuels loading over this landscape. Currently the timber stands in this area are growing too dense and are in poor forest health which makes them susceptible to insects and disease and large wildfires.

3. 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 develop an alternative in the EA that analyzes the impacts of thinning prescriptions with wider spacings. Decision-makers should have the opportunity to consider a full range of options. Limiting them to considering a single intensity of treatment constrains the ability for you to implement site-specific treatments that best meet the purpose and need.
4. 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 power point presentation showing the intensity of burn in riparian areas on their lands during the fires of 2015. Most of these acres had not been treated, thus demonstrating the need for active management in the RCHAs. The photo below is from this presentation and represents the uncharacteristically severe wildfire impacts associated with riparian areas.



5. AFRC encourages the Forest to use a variety of silvicultural prescriptions in this project to accomplish additional resource needs and RMP objectives. 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, regeneration, shelterwood, or seed tree harvests might be used to improve and increase early seral vegetation. Regeneration harvest is also integral to meeting agency requirements for sustained-yield timber management as partial harvests and thinning treatment opportunities will eventually

be exhausted. 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.

6. 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.
7. AFRC supports the use of Designation by Prescription for this project. 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.
8. AFRC suggests allowing new ground based equipment methods such as tethering to operate on slopes over 40%. The Forest 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. Please develop an analysis that is flexible enough to permit this new technology.
9. AFRC supports the Forests' efforts to restore the aquatic systems in the project area. One aspect that the Forest has outlined in the past has been by system road decommissioning. AFRC does not support wide-scale road decommissioning, but rather we support putting these roads into storage. This can be accomplished by blocking the roads with gates, berms, stumps or other methods. The Forest can also remove culverts if needed. The idea is to preserve the road prism for future management use including harvests, access for fire or other relevant purposes. Ultimately, we would like to see the Forest Service clearly describe the rationale for any road segment decommissioning by disclosing the resource risk being mitigated by removing a road and how that mitigation outweighs the potential future administrative access needs (for timber management, fire suppression, etc.) that will be lost.
10. The Forest 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 Sweet-Ione Resources 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.

Thank you for the opportunity to provide scoping comments on the Sweet-Ione Integrated Resources Project. I look forward to following the implementation of this project as it moves forward to formal scoping period.

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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