VIA Email: comments-pacificnorthwest-colville-republic@fs.fed.us

February 26, 2019

Christy Merritt
Kettle Falls Ranger District
255 West 11th Avenue
Kettle Falls, Washington 99141

Dear Christy:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Sanpoil Draft EA.

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 Sanpoil Project Area is located in the southern part of the Republic Ranger District and totals approximately 48,000 acres. The project area shares an extensive border on the south boundary with the Colville Indian Reservation. Due to the unique partnership between the Forest Service and Confederated Tribes of the Colville Reservation, under the Tribal Forest Protection Act (TFPA), this tool will be used for helping to restore land managed by the Forest Service and for protecting tribal trust forest lands and resources from threats such as insects, disease and wildfires coming from Federal Lands.

In addition to the TFPA, the Sanpoil Project Area is part of the Collaborative Forest Landscape Restoration Program (CFLRP) and a Vision 2020 project. The elements for the CFLRP in this area has focused on safety for key travel routes and protection for the Wildland Urban Interface areas. The Sanpoil area has a number of forest health problems including existing insect and disease infestations stemming from a large blowdown event in 2012 and a large wildfire that burned adjacent to the area in 2015. Additionally, most stands are overstocked and ripe for

additional mortality and wildfire that could have significant impact to the adjacent Colville Indian Reservation, private landowners, key access routes, and a variety of other Forest resources.

AFRC provided written comments during the scoping period for the Sanpoil project on January 20, 2017. In those comments we stated that AFRC supports the stated Purpose and Need for action in the project which includes:

- To promote forest health and resiliency within the project area to foster conditions that are less prone to disturbance events including insects, disease, and wildfire.
- Improve or maintain water quality, watershed functions, and aquatic habitat in the Sanpoil Project Area.
- Provide forest products that are economically viable and sustainable to support infrastructure and jobs in the Tri-County area.

AFRC provides the following comments for your consideration that we believe could strengthen the Sanpoil project as it moves forward.

1. There are strong incentives for this project to move forward including the desire of the Colville Tribe to conduct this project under the Tribal Forest Protection Act. Further the project is in a CFLRP designated area, and finally there are many miles of adjacent Wildland Urban Interface which need to be protected. Of paramount concern should be the need to do fuels reduction projects in this area. The wildfires of 2015-16 burned hundreds of thousands of acres on the Colville and the Sanpoil project needs treating before a large scale burn impacts this landscape.

2. AFRC supports the Forests' plan to manage 5,340 acres using commercial thinnings or thinnings with openings. AFRC also supports the plan to treat 2,468 acres using shaded fuel breaks along major travel routes. Much of the Sanpoil project area is in three roadless areas, and the commercial treatment of 7,808 acres represents a good portion of the manageable project area. Timber volume from these acres are very important to the local timber industry and for the nearby small rural communities and counties.

   We encourage the Forest to maximize the commercial volume being removed from these 7,808 acres. For every one million board feet of timber harvested approximately 12 jobs are created. Several milling facilities have left communities surrounding the Colville National Forest in recent years due to lack of adequate log supply including the sawmill in Republic. It should be noted that projects like Sanpoil could help maintain the existing milling facilities that depend on wood from the Forest and will also help support the existing logging infrastructure.

3. In my previous scoping comments, I suggested that the Forest thin to wider spacings for the vigor of residual trees and for risk reduction from wildfires. Further, the insect damage, blowdown volume and overcrowding problem in many of the stands need to be addressed, and this will require heavy thinnings or regeneration harvests to establish young disease free stands. To supplement that comment, I am including a report by R.

Haugo et al. titled *Forest Ecology and Management*. In that report is states that approximately 41% of all coniferous forest in eastern Washington and eastern and southwestern Oregon was in need of a transition to a different s-class in order to restore forest structure to a Natural Range of Variability condition. This report points out the fact that the forests in eastern Washington need to be thinned heavily to reduce fire danger and to return these stands back to more natural conditions.

Further to support the level of needed restoration, the report finds: "*We have identified approximately 1.7 million ha presently in need of disturbance (including disturbance then succession) to restore forest structure NRV on US Forest Service lands outside of wilderness and inventoried roadless areas. Within our analysis area the US Forest Service averaged approximately 12,000 ha per year of hazardous fuels treatments between 2004 and 2013 and had a total of nearly 19,000 ha of forest vegetation improvements in 2013 (US Forest Service Pacific Northwest Region; unpublished data). Assuming that these treatments are additive and address disturbance restoration needs identified in this study, at these treatment rates* ***it will take over 50 years to meet the identified disturbance restoration needs on these US Forest Service lands."***

AFRC believes that treating 7,808 acres of the Mt. Hull project will help to reduce the backlog of acres currently found on the Okanogan-Wenatchee that is in poor health.

4. As pointed out by your Purpose and Need, the Forest intends to improve or maintain water quality, watershed functions, and aquatic habitat in the Sanpoil Project Area. AFRC strongly encourages the Forest to enter into the riparian areas to remove some of the fuel loading and cover. Recent large wildfires have shown that some of the most severe burns and resource damage have occurred in the riparian areas where the fuel loads are the highest. Creating openings in the riparian areas also allows more sunlight to enter which can enhance other vegetation and insect production for a variety of species that depend on them for food.

   It has been documented by many that most of the wood that naturally recruits to streams comes from within the first 65 feet of the stream channel (Murphy and Koski, 1989; McDade et al. 1990. Johnson et al. 2011). So if this is where the LWD is coming from then thinning in this region would likely accelerate its creation. We encourage the Forest to design riparian thinning treatments on this project in ways that foster positive changes to large wood supplies that would result in measurable changes. One way to accomplish this is to reduce the no-cut buffers. It has also been documented that vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment (Rashin et al. 2006). Partial cutting down to one or two conifers from intermittent and perennial stream channels would accelerate the recruitment of LWD with minimal impacts to sedimentation and stream temperature. We would like the Forest Service to consider these trade-offs closely in the planning for this project to improve riparian conditions on the maximum amount of these reserves.

We would also like the Forest to consider including some of the following pieces of scientific research into their analysis. Much controversy surrounding any type of thinning in riparian reserves has surfaced, and we think the following information would be useful in justifying the kinds of beneficial treatments the Forest implements.

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.

The photo below is from this presentation and represents the uncharacteristically severe wildfire impacts associated with riparian areas.

5. AFRC strongly supports the Forests plan to perform commercial thinning with openings for insect and disease containment. This is similar to the variable density thinning but because of moderate-to-high levels of insect or disease within the units, small group openings will be created over up to 50% of the unit to reduce future ground fuel accumulations and increase the stands ability to withstand disturbance. Openings may be planted with fire resistant larch or ponderosa pine especially in area where these species are lacking due to past management. This will add species diversity and resiliency to the stand. In addition, these openings will provide early seral plant species for forage for big game mammals.

6. 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. There are 6,904 acres of big game winter range within the project area. The Colville National Forest is short of early seral plant stages needed for big game forage and overstocked on cover. AFRC suggests using the regeneration harvest tool in these areas to produce more early seral plant communities for big game forage.

7. AFRC supports the use of Designation by Prescription (DxP) for this project. The Forest is currently using this tool on a broad scale and it is working well. It is both a time saver and money saver for the Forest allowing more time to be spend on planning new projects.

8. AFRC continues to recommend using tractor skidding 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 has been willing to try new equipment including tethered logging to achieve desired results on steeper slopes. We applaud your efforts and look forward to bringing more inventive techniques and equipment to the Forest.

9. Old Growth Dependent Species Habitat MA-1 covers 2,682 acres of the project area. AFRC believes that commercial thinning in these areas and reducing the risk of wildfire will help promote the values that the Forest Service is trying to achieve which is improved habitat and diversity for wildlife and plant communities.

10. There are 929 acres of private lands within the boundaries of this project and several miles of private land bounding the project area to the north including the community of Republic which is within one mile of the project area. The areas around these WUI boundaries should be heavily thinned to the above mentioned densities to help fireproof those stands and protect private property from catastrophic wildfires burning from federal lands.

11. AFRC supports the Forests' use of shaded fuel breaks removing both commercial and non-commercial sized trees from areas adjacent to major roads. This technique will produce healthy forests, provide safety corridors, and provide the first line of defense against potentially large wildfires.

12. A thorough analysis of what roads will still be needed for future fire access, forest treatments, recreation etc. should be conducted before the final plan is adopted for roads to keep as system roads and those to delete. While AFRC agrees that some roads need to be closed we prefer gating or blocking rather than obliteration. AFRC does support building .25 miles of new road, constructing 3.65 miles of new temporary road, and maintaining 67 miles of existing roads in the project area.

13. 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.

14. AFRC supports using the TFPA authorities, to help the Forest plan and implement this project; however, AFRC believes that any commercial project or timber sale should be open to all perspective bidders and should not be sold sole source to the Colville Tribe. AFRC strongly endorses the competitive bidding process on all Forest Service timber sales.

15. AFRC believes that analyzing this project using an Environmental Assessment (EA) is adequate since there appear to be no significant negative impacts on the landscape during proposed operations, rather the actions will improve forest health and benefit other resources as well as reducing the threat of catastrophic wildfire to the Forest and to adjacent land owners.

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

Sincerely,

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