VIA Email: http://www.fs.usda.gov/project/?project=56148

June 20, 2019

Kyla Berendzen
Fernan Ranger District
Idaho Panhandle National Forest
2502 East Sherman Ave.
Coeur d'Alene, Idaho 83814

Dear Kyla:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the English Point Forest Health 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 English Point Project covers 358 acres and is located at the junction of Lancaster and English Point roads in Kootenai County. English Point is designated a primary recreation area (Management Area 7) in the Forest Plan and the management direction is focused on providing forest visitors with a quality, non-motorized outdoor recreation experience. This area receives high recreation use throughout the year. While recreation is the emphasis for this area, many trees throughout the area are diseased and mortality rates are very high, causing mature trees and forest conditions to decline throughout the recreation area. If left untreated, deteriorating forest conditions would eventually alter the character of the recreation setting and contribute to increased wildfire risk. In addition, the high number of dead trees are creating a safety hazard for the hikers using the many miles of trails in the area.

Currently, because of fire suppression over the years, shade-tolerant late seral species such as Douglas-fir, grand fir and western hemlock now dominate the landscape and they are much more prone to root diseases and insects such as bark beetles than are ponderosa pine, white pine and larch. Increasing mortality rates are resulting in a continuous loss of the overstory, which is not being replaced. High populations of root disease in the soil also infect regenerating trees (especially grand fir and Douglas-fir) and prevent them from reaching maturity. Over time, the recreation area has lost much of its mature forest and has had relatively little recruitment of disease resistant ponderosa, larch or white pine seedlings and saplings to replace the dying trees. This trend sets the forest within English Point on a trajectory towards continuous decline.

With these conditions currently found in the project area, AFRC supports the Forest's proposed action, which is to manage for healthy, resilient, and spatially diverse forest conditions that would facilitate fire management and provide a safe recreational experience of a healthy forest. Desired structural conditions and species composition would better resist root diseases and pathogens, insects, and disturbances. Treatments would include commercial timber harvest, non-commercial tree removal, and tree planting needed to restore sustainable forest conditions that contribute to the desired character and setting of the recreation opportunity for the long term. These treatments would promote forest resilience by targeting composition, structure, and health objectives while minimizing impacts to recreation use, scenic quality, and the character of the recreation setting.

In addition to supporting the project, AFRC offers the following comments which we feel will further support and/or benefit the project.

1. Considering the conditions of the timber stands and heavy recreational use in the area, AFRC supports the use of a Categorical Exclusion (CE) as proposed to more quickly treat this area. The CE's that will be used are:
    a. Healthy Forests Restoration Act of 2003 (HFRA, Sections 603 (c)(2)(A) and (B)-Insect and disease infestation and
    b. 36 CFR 220.6(d)(4)-Repair and maintenance of roads, trails, and landline boundaries.

    Additionally, Pursuant to CFR 215.12, the decision is not subject to administrative review (objection), and District Ranger Dan Scaife is the Responsible Official for the Project.

2. AFRC supports the Forest's use of the irregular shelterwood harvest on dry sites, and group shelterwood harvests on moist sites. However, AFRC suggest there may be a need to create patches with openings larger than two acres where needed to address root rot and insect and disease issues in some of the cool moist stands. This would also benefit deer and elk by providing early seral forage. We also support the proposed sanitation and salvage of selected dead and dying trees along with needed rehabilitation of pockets of extensive mortality.

3. While not highlighted in the scoping document—the timber generated from this project area will be very important for the forest products infrastructure located nearby. 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. Studies by the University of Idaho have shown that as many as 18 direct and indirect jobs are created for every million board feet of timber that is harvested.

4. AFRC supports the expedited work in the area which would entail: In 2020-Layout and marking of units on the west side of English Point Road in the spring, and by summer, commercial timber harvest would begin in this area. This is the area where most of the commercial timber is found. Layout and harvest on the eastside of English Point Road would take place in 2021. AFRC assumes these would be two separate projects and two separate contracts with the eastside work being more non-commercial?

5. The use of irregular shelterwood, group shelterwood, and sanitation salvage, might provide a good opportunity to use Designation by Prescription which could minimize the marking needed by the Forest Service to prepare the project. The prescriptions appear to be pretty straight forward.

6. 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. When discussing the winter logging criteria AFRC would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there.

7. The Forest is suggesting that some horse logging may need to occur to remove the commercial logs in the east portion of the project. While AFRC supports this option, we recommend that should a horse logger be unavailable, new lightweight, light touch ground based equipment could probably attain the results the Forest is after when used with the proper application.

8. AFRC would like to thank the Forest and the local collaborative for looking at the immediate needs of the Forest in the English Point area and choosing to use the CE option for quick treatment.

Thank you for the opportunity to provide comments on the English Point Forest Health Project. I look forward to following the implementation of this project as it moves toward a Draft EA.

Sincerely,

Tom Partin
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