



Forest Products

Eligible Objectors & Interested Persons for this issue:

- American Forest Resource Council
- Pend Oreille County Commissioners
- Williamson Consulting
- Northeast Washington Forest Coalition

Objections:

- The Colville National Forest is currently producing more timber than indicated in the revised Land Management Plan (LMP). There is direction in the revised LMP to maintain the harvest volumes at this lower production rate. This could have negative economic impacts on local communities reliant on forest-product-related industries.
- The objective of 6,000 to 12,000 acres of vegetation management treatments per year over the life of the revised LMP is too low. A more aggressive approach is needed to (1) prevent wildfires and (2) provide the fiber needed to support local manufacturing infrastructure.
- The proposed long-term sustained yield of nearly 100 mm board feet per year will support an allowable sale quantity greater than 67 mm board feet. A more aggressive treatment plan is needed over the next 15 years to move the forest towards desired future conditions (DFC).
- Timber harvest and scheduled production should be consistent and predictable. Acres treated that makes progress toward desired vegetative conditions should at least produce 80 million board feet per year.
- To give the public a clearer idea of what is necessary to accomplish the goals of the revised LMP, the final Environmental Impact Statement (FEIS) calculation of volume of timber budgeted should be based on the volume/acreage that should be removed/treated to reach the DFC.
- In Table B-1 of the revised LMP, "initiate active management activities on 6 to 12 thousand acres per year..." should clearly communicate the intent is to treat acres that have commercial value.
- The FEIS gives inadequate recognition to the need for collaborative approval of post-disturbance restoration activities.
- Table B-1 of the revised LMP should clearly communicate that the intent is to treat acres having commercial value.
- The FEIS does not change the pace and scale of timber harvest to accomplish restoration in a timely fashion and the FEIS does not comply with the Multiple-Use Sustained-Yield Act (MUSYA).
- The FEIS does not recognize fire and fuels as a "significant issue" to forest restoration when calculating the cutting budget under MUSYA.
- The FEIS modeled timber volume is based on starting from the DFC of the forest. The calculation should be based on the volume/acreage (restoration) that should be removed/treated to reach the DFC.



Resolution Options Proposed by Objectors:

- To support the local timber infrastructure and ensure local community stability dependent on the Colville National Forest, the revised LMP should attempt to maximize its sustained yield timber output. [American Forest Resource Council].
- The revised LMP does not sufficiently address the need for immediate restoration on the Colville National Forest. Under Alternative P, the average annual number of acres planned for timber harvest will be 5,000 acres or one-half of one percent (.0058) of the available acres. At this pace, there is no way the forest health and wildfire conditions can be addressed with any effectiveness. It would take 86 years to get all acres treated and 65 years to just treat the suitable timber acres. [American Forest Resource Council]
- The Forest Service should analyze unconstrained harvest calculation and departure from even-flow to more quickly get to Long-Term Sustained Yield (LTSY). The LTSY for the Colville National Forest is 97.4 million board feet (MMBF). This volume can only be achieved when all the manageable timber acres have reached their Historic Range of Variability (HRV). Objectors request a departure from non-declining flow for timber volume and believe these model runs should have been part of the revised LMP. [American Forest Resource Council]
- The revised LMP must reflect an adequate timber volume to support the local timber industry infrastructure and ensure community stability. The Forest Service planned FY19 timber sale program (PTSQ) is 82.6 MMBF. The projected timber sale quantity outlined in the Final Plan is 48.1 MMBF. The numbers in the final LMP must reflect what the Forest is proposing to sell now if the LMP is based on using the current and static budget. [American Forest Resource Council]
- Change the analysis to specify the number of acres in need of treatment annually to achieve the DFC within 35 years. [Northeast Washington Forest Coalition]
- Change Table B-1 (revised LMP p 175) from “initiate active management activities on 6 to 12 thousand acres per year...” to "Initiate commercial and non-commercial management activities on at least 18 to 25 thousand acres per year....." [Northeast Washington Forest Coalition]
- Modifying the revised LMP to include a Forest-Wide Standard for protections of large and old trees. Modify this new Standard, based on FW-GDL-VEG-03: [Northeast Washington Forest Coalition]
 - Clarify that even in emergency situations, efforts will emphasize retention of large trees.
 - Modify insect and disease infestation exemptions for removing large trees to be based on a deviation from the Historical Range of Variable for insect and disease levels.
 - Modify exemptions for removing large trees based on forest structure desired conditions (see FW-DC-VEG-03, Forest Structure) to include a landscape and stand scale pattern component.



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- Suggested changes to FW-STD-VEG-10: Large Tree Management underlined below.
[Northeast Washington Forest Coalition]
 - Management activities should retain and generally emphasize recruitment of individual large trees (larger than 20 inches diameter at breast height) across the landscape. Exceptions where individual large trees may be removed or destroyed include the following.
 - Trees need to be removed for public health or safety (such as, but not limited to, danger/hazard trees along roads or in developed or administrative sites).
 - Trees need to be removed to facilitate management of emergency situations such as wildfire response. Every effort should be made to preemptively establish fire breaks and retain exiting large trees to prevent their emergent removal.
 - The following exemptions apply only to situations where removal of smaller trees along cannot achieve the stated desired conditions:
 - Trees need to be removed to meet, promote, or maintain desired conditions and spatial pattern for structural stages (see FW-DC-VEG-03, Forest Structure) and species composition.
 - Trees need to be removed to control or limit the spread of insect infestation or disease outside the historical/future range of variability.
 - Trees need to be removed where strategically critical to reinforce, facilitate, or improve the effectiveness of fuel reduction in wildland-urban interfaces.
 - Trees need to be removed to promote special plant habitats (such as, but not limited to, aspen, cottonwood, whitebark pine).