

Forest Products

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

Objectors contend:

- **The Colville NF is currently producing more timber than indicated in the LMP. There is direction in the 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 course of the 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 LTSY of nearly 100 mm board feet per year will support an ASQ greater than the 67 mm board feet. A more aggressive treatment plan is needed over the next 15 years to move the forest towards desired conditions.**
- **Timber harvest and scheduled production should be consistent and predictable. Acres treated that moves 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 forest plan, the 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 "initiate active management activities on 6 to 12 thousand acres per year..." should clearly communicate that 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.**
- **In Table B-1 (LMP p 175) should clearly communicate that the intent is to treat acres that have 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 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 based on starting from the Desired Future Condition (DFC) of the forest. The calculation should be based on the volume/acreage (restoration) that should be removed/treated to reach the DFC.**

RESPONSE:

The Forest Service is tasked with working to balance forest management with emphasis on multiple-use and working to collaboratively manage the renewable resources that are a product of National forest lands. While acres may be listed as suitable for harvest, analysis through site specific NEPA must be conducted to ensure activities meet these laws. The FEIS does not provide site specific analysis for projects based on current or future needs and/or conditions.

16 U.S. Code § 1611.Timber:

Forests may establish an allowable sale quantity for any decade which departs from the projected long-term average sale quantity that would otherwise be established: Provided further, that any such planned departure must be consistent with the multiple-use management objectives of the land management plan. Plans for variations in the allowable sale quantity must be made with public participation as required by section 1604(d) of this title. In addition, within any decade, the Secretary may sell a quantity in excess of

the annual allowable sale quantity established pursuant to this section in the case of any national forest so long as the average sale quantities of timber from such national forest over the decade covered by the plan do not exceed such quantity limitation".

Consistent w/ [above statute] the forest has identified a baseline for timber harvest that can be sustained and meet non-declining flow expectations. In addition, the forest acknowledges there may be increases in annual output based on conditions at the time of planning and harvest.

- FEIS, Volume III, Appendix E, pp. 1010-1075 - Responses to comments on draft proposal related to objection comments.
- FEIS, Volume II, Chapter 3, Environmental Consequences for Timber and Forest Products defines and describes long term sustained yield, allowable sale quantity, and timber sale program. The terms are also defined in the Glossary in Volume 3. Forest Vegetation Methodology, also Volume II, chapter 3, describes the modelling process used.
- FEIS, Volume II, Chapter 3, Desired future conditions and multiple-use objectives were taken into consideration

Conclusion:

After reviewing the information presented in the FEIS, it is evident the forest is choosing to be conservative in harvest efforts for continued compliance with NFMA, sustainable harvest, and ecological benefits to meet the desired future conditions. As the forest continues to plan project-level decisions implementing the overall forest plan, it is stated in the draft Record of Decision the annual program quantity is based upon current conditions and needs to meet desired future condition goals (draft ROD, pp. 10).

Response to proposed remedies:

- 1) In order to support the local timber infrastructure and ensure local community stability that depends on the Colville, the Final Plan should attempt to maximize its sustained yield timber output. *American Forest Resource Council*

The FEIS is developed based upon the harvest needs to support the ecological environment and balance the economic impacts; however, the motivation behind the FEIS is not solely based on economic values. The forest analyzes the economic impact in the FEIS (FEIS, Vol. III, pp. 590-599).

- 2) The Final Plan does not sufficiently address the needs of the Forest for immediate restoration. 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 FEIS includes responses to comments received that highlight the constrained models and non-declining flow calculations. Within the response, the forest acknowledges that the models are based upon budget and the ecological needs and capacity for maintaining the harvest output. The forests' rationale for not increasing the number of acres is to comply with the non-declining flow requirements of NFMA. Their approach identifies the proposed acres for treatment would be the minimum based upon budget and organizational capacity, however, the forest is not opposed increasing the number of acres treated based upon ecological needs, budget, and capacity arise. These would be project-level decisions that would be analyzed in subsequent NEPA decisions (FEIS, Vol. III, Appendix G, pp. 1311-1312).

- 3) The Forest should analyze the unconstrained harvest calculation and departure from even-flow to more quickly get to LTSY. The Long-Term Sustained Yield for the Colville National Forest is 97.4 MMBF. This volume can only be achieved when all the manageable timber acres have reached their HVR. AFRC request a departure from non-declining flow for timber volume, and we believe that these model runs should have been part of the Final Plan. *American Forest Resource Council*

When the analysis for unconstrained models were conducted, it was found to be inconsistent with non-declining flow and LTSY, which are requirements for compliance in NFMA (FEIS, Vol. III, Appendix G, pp. 1312-1313).

- 4) The Proposed Plan 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 PTSQ outlined in the Final Plan is 48.1 MMBF. The numbers in the Final Plan must reflect what the Forest is proposing to sell now if the Plan is based on using the current and static budget.

The FEIS analyzed all areas suitable for production, and /or harvest, in addition to other woody material that may be available for sale. The PTSQ takes into account the forest's fiscal capability and organizational capacity. In compliance with NFMA, the forest holds the latitude to increase or decrease to meet restoration needs towards achieving the overall desired future conditions.

- 5) Change the analysis to specify the number of acres in need of treatment annually to accomplish the DFC within 35 years.

The FEIS provides a comprehensive analysis of the overall forest health and identifies the desired future conditions needed for a healthy and resilient forest. Project-level decisions to evaluate current conditions of suitable acres will be completed prior to implementation.

- 6) 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*

The FEIS analyzes the ecological needs for management activities to meet the desired future condition, along with managing the economic benefits (FEIS, Vol. I, pp. 97, 114-132. FEIS, Vol. II, pp. 595-596, 627-629).

- 7) Modifying the Land Management Plan to include a Forest Wide Standard for protections of large and old trees rather than a Desired Condition.

Forest addressed the comment in FEIS, Vol. III, pp 1029. The FEIS, Appendix E also included analysis of large trees and structural stages in FEIS Chapter 3, Wildlife.

- 8) Modify this new Standard, based on FW-GDL-VEG-03 (LMP p 42):
 - Clarify that even in emergency situations efforts will emphasize retention of large trees
 - Modify insect & disease infestation exemptions for removing large trees to be based on a deviation from the Historical Range of Variable for insect & 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. Suggested changes underlined below:

FW-STD-VEG-10. Large Tree Management: 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 & retain existing 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).

Additional measures and criteria to further establish a framework for retaining large trees in emergency situations could be impactful to decision-makers and law enforcement. During emergency situations, split-second decisions impacting safety, life, and property are made and adding additional layers can be detrimental to efficiency and safety.

Instructions:

The Forest should consider explicit language in the ROD stating that subsequent NEPA analysis, such as Categorical Exclusions, and Environmental Assessments will be utilized to determine the annual timber sale program/quantity and will be based upon ecological needs to meet the desired future condition.

Consider increasing the objective for acres treated annually from 6,000-12,000 up to 18,000-25,000 in Table B-1 of the revised Forest Plan.

SPECIFIC QUESTIONS POSED BY THE REVIEWING OFFICER:

The Blue Mtns used TSPQ (Timber Sale Program Quantity)? Are we adding confusion between TSPQ and PWSQ (Potential Wood sale quantity)?

REVIEW TEAM RESPONSE:

Yes, this can be confusing. The Blues uses TSPQ as overall sale of wood products that meet minimum utilization standards on suitable lands and other lands that would allow timber harvesting to be used as a management tool to achieve other multiple-use objectives. Colville uses PWSQ as overall sale of all wood products on suitable lands including wood products that are sold that do not meet utilization standards. Colville also uses PTSQ as overall sale of wood products that meet utilization standards on

suitable lands. PTSQ does not add wood products that do not meet utilization standards (fuelwood, firewood and biomass). In the estimate quantity as PWSQ does. TSPQ in the Blues is very similar in context to PTSQ in the Colville.

The objectors made the assertion that the ASQ was calculated on a regulated forest that is within the Historic Range of Variability. They go further to point out at the planned management level reaching regulation or HRV may never happen. Someone should dig into the modeling they used and help us (me) understand how to explain what they have done here.

REVIEW TEAM RESPONSE:

The forest used St-Sim module of SyncroSim, version 2.3.8 for modeling. The models used in this effort were adapted from models received from Mark Loewen (NE Washington Zone Vegetation Specialist, now retired). These base models were evaluated for potential flaws (with fixes applied as necessary) and reworked through a workshop process. Model workshops were conducted in Wenatchee, WA with key specialists' involvement in July 2014. Further refinement of the models was done based on feedback received from Colville National Forest specialists in August 2014. Final modifications were made in consultation with Jonathan Day, Colville Plan Revision Vegetation Specialist between August and November 2014.

The model space is stratified by two primary components: (1) Potential Vegetation Type, and (2) Modeling Zone.