United States Department of Agriculture | **Forest Service** | **Region One** | **200 East Broadway P.O. Box 7669 Missoula, MT 59807**

File Code: 1570-1 (218)
#07-01-00-0158
Date: September 4, 2007

Mike Mihelich
Forest Watch Coordinator
Kootenai Environmental Alliance
P.O. Box 1598
Coeur d'Alene, ID 83816-1598

Dear Mr. Mihelich:

This letter is in response to your objection dated August 2, 2007, to the Prichard Murray Fuels Reduction Project located on the Idaho Panhandle National Forests. I have read your objection on behalf of the Kootenai Environmental Alliance, The Lands Council and the WildWest Institute. I have also reviewed the Environmental Assessment (EA), the analysis in the project file, and I understand the disclosed environmental effects. I have also considered the comments submitted during the public scoping for this project. My review was conducted in accordance with 36 CFR 218.

On December 3, 2003, President Bush signed into law the Healthy Forests Restoration Act of 2003 (HFRA) to reduce the threat of destructive wildfires, while upholding environmental standards and encouraging early public input during planning processes. The legislation helps further the President's Healthy Forests Initiative pledge to care for America's forests and rangelands, reduce the risk of catastrophic fire to communities, help save the lives of firefighters and citizens, and protect threatened and endangered species.

This project clearly demonstrates compliance with the HFRA. The primary purpose of the Prichard Murray Fuels Reduction is to:

- Reduce dense fuel conditions in the wildland urban interface so potential fire behavior would be less intense and severe.
- Increase the proportion of resilient species composition (western larch, ponderosa pine and white pine) so stands are healthier with less fire risk.
- Create a mosaic of healthy stands that vary in age, tree diameter, and canopy (structural stages) and patch size.

The HFRA provides for a pre-decisional administrative review process in which the objector provides sufficient narrative description of the project, specific issues related to the project, and suggested remedies that would resolve the objection (36 CFR 218.7). HFRA also allows for the

parties to meet in order to resolve the issues. On August 14, 2007, the District Ranger and representatives of the interdisciplinary planning team met with you and discussed your concerns about the project and analysis. In keeping with the direction of HFRA regarding the objection process, it would have been most helpful if your objection letter had identified specific remedies you are seeking to resolve your concerns. Nonetheless, I understand this proved to be a very productive meeting for all the parties, and there was a follow-up meeting between you and the District to review further information.

The Responsible Official and I have reviewed the project in light of the issues presented in your objection letter. I have reviewed the notes from the objection resolution meeting and have considered the primary issues raised therein, and your discussions with the District surrounding possible resolutions.

Your objection identified a broad range of issues, but you informed District personnel that you wanted to focus the meeting on two primary concerns. The first issue centered around Alternative 2 and proposed management activities, particularly mechanical, in allocated old growth stands. You identified several concerns underlying this issue, including, a) the HFRA section 102(e)(2) reference to “maintain old growth conditions”, b) the accuracy of the TSMRS data base and confidence in the 10 percent to 12 percent old growth acres on the Idaho Panhandle National Forests, and c) the effect of old growth loss on management indicator species.

The District Ranger identified the importance of proposed underburning treatments to reduce fuels within two old growth stands immediately adjacent to private land and structures, and one along Forest Highway 9, a primary ingress/egress route. No commercial harvest would be necessary in these stands prior to the underburning treatment, and these stands would maintain their status as allocated old growth following treatment. During the meeting, you stated you felt these treatments may be acceptable but would have to defer to the others you were representing.

Your second issue was the large tree retention requirement under HFRA section 102, covering activities outside of old growth. The focus under this section is on small diameter trees, favoring the retention of large trees as appropriate for the forest type, to the extent large trees promote fire resilient stands. You felt that Alternatives 2 and 3 appeared to propose cutting large trees.

The District highlighted information on the average diameter by species of material proposed for removal in non-old growth stands. The average diameter of all trees designated for removal was 11.9 inches. The average diameter of trees designated for removal for the three pre-dominant species being removed are:

Species	Percent of total volume removed	Average diameter of trees designated for removal
Grand fir	36	12.5”
Douglas-fir	33	13.2”
Hemlock	15	10.9”

You were concerned that averages do not reflect range, and some large trees may still be cut. You had a subsequent meeting with District personnel to review additional data on the type and size of trees being removed under proposed mechanical treatments in non-old growth stands.

It is my understanding that after further consultation with those you represent, you informed the District of your suggested remedy for the old growth and large tree retention issues. You would recommend the Responsible Official adopt Alternative 3, and limit commercial harvest to trees 18 inches and less in diameter. You also stated you were agreeable to the proposed underburning activities to reduce fuels in the three old growth units discussed above.

I appreciate your effort to define a remedy. After reviewing the project documentation, I do have concerns on using a specific diameter limit. The intent of the proposed treatments is to leave the largest and best trees on the site, while meeting the purpose of the project to reduce fuels and increase seral species such as larch and ponderosa pine, as well as western white pine. Leaving the larger diameter grand fir or Douglas fir, especially where they are adjacent to existing larch or pine, leaves a risk that they may torch during underburning. This would lead to the loss of the species we are trying to retain and to promote for fire resiliency. I find the record supports compliance with HFRA requirements for large tree retention outside of old growth stands as appropriate for the forest types addressed and the promotion of fire-resilient stands.

The Responsible Official is aware of your preference and rationale for Alternative 3 and your agreement on the underburning of the three specified old growth units, and will consider this information in drafting the Decision Notice.

Based on the notes from your meeting with District personnel, a couple of other issues were also discussed. With regard to soil impacts from harvest activities, you stated that as long as ground surveys were completed on each harvest unit and the information disclosed appropriately, that was sufficient. The District indicated field reviews were conducted on each proposed harvest unit, and documentation in the record supports their claim. You further clarified that your primary concern for wildlife was associated with activities in old growth and the harvest of large trees, which I have previously discussed.

It is my understanding that you felt the discussion on the preceding issues was of most importance to you, and that you did not see a need to discuss, or further resolve, other issues raised in your objection letter. I will, therefore, consider these issues to have been satisfied.

In closing this letter, I want to commend you, the Ranger, and the ID team for working together toward resolving some of your concerns. The combined work of everyone will make this a better project.

This response is not subject to further administrative review by the Forest Service or the Department of Agriculture [36 CFR 218.10(b)(2)].

Sincerely,

/s/ Kathleen A. McAllister
KATHLEEN A. MCALLISTER
Reviewing Officer

cc:
Responsible Official
Forest Coordinator