

Sandpoint Ranger District  
Attn: Michell Norton  
1602 Ontario Street  
Sandpoint, ID 83864

February 7, 2020

**Subject: Buckskin Saddle Environmental Assessment**

Dear Ms. Norton:

The vision of the Panhandle Forest Collaborative (PFC) is to assist agencies by bring balanced approaches to timber, wild ecosystems and recreation and to contribute to the sustainable social, environmental and economic viability of our region. The PFC focuses on issues on the Idaho Panhandle National Forests (IPNF), primarily within the Sandpoint and Priest Lake Ranger Districts and a portion of the Coeur d'Alene Ranger District. Our goals include reducing litigation, promoting sustainable operations, enhancing travel and recreation opportunities, maintaining infrastructure for timber, ranching and recreation, and conserving native ecosystems. The PFC works to build consensus recommendations for projects and forest plans that address these goals.

We are writing to provide comments on the Buckskin Saddle Environmental Assessment (EA) on behalf of the PFC. As you know, the PFC has been involved in the planning process for this project since its inception. We agree that there is a need to improve and maintain recreational trails, improve forest conditions, reduce the threat of fire to communities and infrastructure, improve habitat for big game and flammulated owls, improve water quality and aquatic habitat, and remove barriers to fish passage.

The Buckskin Saddle Project is a large, landscape-scale project that includes approximately 13,400 acres of commercial treatments and approximately 6,450 acres of precommercial treatments. The proposed silvicultural treatments, pre-commercial thinning, and prescribed fire will go along way toward achieving desired conditions for the project area as stated in the Forest Plan. The PFC appreciates the fact that none of the proposed activities would modify dry old growth forest stands to the extend that they no longer meet old growth definitions. We also appreciate that scenic objectives have been considered, and treatment units that are visible from the Clark Fork River and Lake Pend Oreille will be designed to mimic natural disturbance patterns. We also noted that steps will be taken to mitigate the scenic effects of the BPA powerline corridor.

The PFC also supports project activities that are designed to reduce erosion and sediment and improve aquatic habitat and fish passage. For example, the Forest Service proposes to conduct maintenance on 56 miles of trails. This will reduce erosion and sediment delivery to streams while improving the recreational experience. Replacement of the culvert on Road 1018 will also reconnect fish habitat above the road in West Johnson Creek to habitat below the road, and relocating road 2711 away from Granite Creek will reduce sediment in this important bull trout spawning stream.

To achieve vegetative desired conditions, the Forest Service also proposes to construct nearly 31 miles of new system roads. The magnitude of new road construction has been a topic of discussion within the PFC. Due to concerns regarding elk habitat security and water quality, the new system roads will be constructed in phases over the life of the project (10-15 year). Phases would include building portions of

the new system roads and then storing these same roads as the proposed treatments units are completed. During operations, these roads would be accessible for administrative motorized use only and would be closed to public motorized use with gates or barriers. The PFC would like to emphasize the importance of adequate barriers to protect wildlife security. We recommend that the Forest Service fully obliterate and recounter the first 300 feet of stored roads in order to ensure the efficacy of road storage and protection of wildlife habitat.

New roads increase the potential for introduction and spreading of noxious weeds. Appropriate measures to mitigate their introduction should be considered, including, but not limited to, the inspection and cleaning of vehicles and equipment entering the project area. Frequent monitoring for weeds along the roads should be conducted throughout the lifetime of the project and for several years beyond. Plans for rapid detection and response to emerging weeds should be developed to manage any emergence before they spread.

The PFC also discussed the potential impacts to water quality and aquatic habitat that might result from new road construction across stream channels. Members of the PFC met with the Forest Service to review information about the condition of proposed stream crossings and the amount of disturbance that would be required to construct those stream crossings. We identified five stream crossing of concern where new road construction would be needed to access nine treatment units. The total acreage of treatment units identified is approximately 238 acres, and the associated new road construction is approximately 2.68 miles (Table 1 and Figure 1). These units are primarily located in the Johnson Creek and Twin Creek watersheds, which have sediment TMDLs. Concerns also arose where channels are incised and would require significant fill and disturbance of riparian habitat conservation areas to construct a crossing. Eliminating these units would not substantially decrease the total acreage treated in the project area. However, eliminating these units and the associated road construction would protect water quality. Therefore, the PFC urges the Forest Service to eliminate these units and the associated roads in the final EA and decision notice.

When issuing timber sale contracts, the PFC also encourages the Forest Service to make helicopter units optional. There are currently no contractors in the local area that are willing to yard logs via helicopter.

In summary, the PFC supports the overall objectives of the project and nearly all of the proposed activities. The PFC encourages the Forest Service to take steps to ensure proper and effective road storage to protect wildlife. We also encourage the Forest Service to eliminate the units and roads identified in Table 1 and Figure 1 to reduce the potential impact to water quality and fish habitat. . The PFC appreciates the opportunity to be involved in the planning process for the Buckskin Saddle Project, and we look forward to reviewing the final EA and decision notice.

Sincerely,



Liz Johnson-Gebhardt  
Co-Chair



Mike Petersen  
Co-Chair

**Table 1.** Units and roads that the PFC proposes to eliminate.

<b>Unit Number</b>	<b>Prescription</b>	<b>Logging System</b>	<b>Fuel Treatment</b>	<b>Acres</b>	<b>New Road Number</b>	<b>Miles</b>
139	ST	SKY	WTY/UB	12	NR21	1.17
136 (part)	SW	SKY	WTY/UB	30	NR21	
138	SW	SKY	WTY/UB	10	NR21	
131 (part)	ST	SKY	WTY/UB	14	NR21	
140 (part)	SW	SKY	WTY/UB	4	NR21	
161 (part)	SW	SKY	WTY/UB	65	NR22	0.87
54	ST	SKY	WTY/UB	19	NR38	0.35
55	ST	TRA	WTY	31	NR38	
143 (part)	SW	SKY	WTY/UB	53	NR54	0.29
<b>Total</b>				<b>238</b>		<b>2.68</b>

Figure 1. Units and roads that the PFC proposes to eliminate.

