



Colville National Forest

Forest Plan Revision Update August 2, 2016

Public Comments on the Draft Forest Plan and Draft Environmental Impact Statement

As I looked through the comments received over the last several weeks, I noticed some common themes in the questions and concerns raised by many of you. For some of the concerns, the plan revision team will need to do additional work; but for some of the questions, we can provide more information and, hopefully, clarity sooner rather than later.

Over the next couple months we will be sending out updates through this newsletter related to the concerns and questions expressed through your comments. We received over 920 letters, so we won't be able to address every comment through these newsletters, but expect to highlight some of the more common thoughts. All of the comment letters are available in the Comment Reading Room:

<https://cara.ecosystem-management.org/Public//ReadingRoom?Project=45826>.

The first topic we'd like to address is related to timber harvest. Because of the way our internal direction is worded, we use many terms the average member of the public doesn't use, and how the terms are used in forest planning can be challenging to understand. The following information should provide some additional information about some of the terminology used in the Draft Forest Plan and Draft Environmental Impact Statement (DEIS).

Forest Plan Revision Volume Numbers:

A forest plan does not set targets for annual timber harvest. A forest's timber target is determined by budget and ability to analyze and complete project (e.g., timber sale) contracts. The Forest Service uses direction from regulation and policy to analyze forest plan alternatives in a consistent manner that allows the public and Forest Service deciding officials to compare potential outcomes from those alternatives.

To fulfill the requirements of the National Forest Management Act (NFMA) and 1982 Planning Rule, alternatives were analyzed to calculate key measures of timber output (Long Term Sustained Yield and Allowable Sale Quantity) for each alternative. Additionally, Forest Service policy requires calculating the projected wood sale quantity and projected timber sale quantity for the first two decades under the revised plan.

Long term sustained yield (LTSY) is the highest uniform, or *consistent*, wood yield that may be sustained given *multiple-use objectives* on lands managed for timber production. The LTSY assumes that all suitable land for timber production is within the desired condition. The LTSY does not include salvage, harvest volume from lands unsuitable for timber production, or other volume that may not fall within the assumed utilization standards¹.

Allowable sale quantity (ASQ) is the quantity of timber that may be sold each year from the area of land suitable for timber production, during the life of the plan, *given an unlimited budget*. *More...*



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Supervisor



for the greatest good

¹ Utilization standards are the minimum specifications a log must meet in order to be included as removal volume. A log or tree must meet all of the specifications. Utilization standards are set by the Forest Service and reflect dimensions that both meet resource needs and are economically viable to largest number of interested parties.

Continued:

ASQ takes into account harvest from lands that are not yet within the desired condition, and therefore is slightly lower than the LTSY. The ASQ does not include salvage, harvest volume from lands unsuitable for timber production, or other volume that may not fall within the assumed utilization standards.

Projected timber sale quantity (PTSQ) is the estimated quantity of timber meeting applicable utilization standards that is *expected* to be sold annually during the plan period. The PTSQ includes volume from timber harvest for any purpose from all lands in the plan area based on expected harvests that would be consistent with the plan components. The PTSQ is based on the planning unit's fiscal capability and organizational capacity as it existed in 2015. The *PTSQ is not a target nor a limitation on harvest.*

Projected wood sale quantity (PWSQ) is the *estimated volume of timber and all other wood products* that are expected to be sold annually from the forest for the life of the plan given the budget and organizational capacity as it existed in 2015. The PWSQ consists of the projected timber sale quantity (PTSQ) as well as other woody material such as fuelwood, firewood, post & poles or biomass that is also expected to be available for sale. The PWSQ includes volume from timber harvest for any purpose based on expected harvests that would be consistent with the plan components. It *is an approximation of what the Forest could produce if this plan went into effect under the budget and organization as it existed in 2015. PWSQ is not a target nor a limitation on harvest.* PWSQ for the No Action alternative was derived by averaging the total wood sale program quantity from 2010-2014.

Background

To better understand the calculation of *Long Term Sustained Yield* and *Allowable Sale Quantity*, it is important to recognize the constraints and assumptions the planning team used for these calculations.

1) Timber Suitable Lands only

The calculation of timber volumes that represent the *Long Term Sustained Yield* and *Allowable Sale Quantity* relate to land designated as suitable for timber production. Please note, harvest can and likely will occur on lands not designated suitable for timber production where other resource objectives are the driving factors in determining vegetation management; however, the referenced volume estimates are intended to reflect scheduled harvest for timber production. These scheduled harvests will be in areas designated as suitable for timber production.

2) Consistency with Multiple Use Objectives and associated Plan Components

Timber volumes are calculated based on consistency with multiple use objectives and associated plan components. For the purposes of this planning effort, all alternatives share the same forest wide desired conditions for vegetation structural stages. Specifically, this desired condition is to manage vegetative systems at or towards their natural range of variation. In other words, management is intended to create and/or maintain representative proportions of the landscape in key structural stages (*Early, Mid-Open, Mid-Closed, Late-Open, & Late-Closed*), commensurate with proportions that would have existed under natural disturbance regimes prior to Euro-American settlement. Because late and old forest structure is a key issue developed in this planning effort, special emphasis was placed on describing its condition and trends in the plan set of documents. For the purposes of this analysis, timber calculations were made using the requirement that harvest volumes at the *Long Term Sustained Yield* level should maintain the desired conditions on the landscape.

3) Principle of Non-Declining Flow

The National Forest Management Act (*NFMA 1976*) requires that the Forest Service limits "sale of timber from each national forest to a quantity equal to or less than a quantity which can be removed from such forest annually in perpetuity on a sustained-yield basis" unless certain key criteria are met in determining and developing a departure. The *principle of non-declining even flow* is intended to provide a steady and predictable supply of timber products from National Forest System lands that does not decline over time. It is further intended to ensure consistent long-term flow of timber products. Non-declining flow is considered on a 10-year (decadal) basis; a given year may exceed the annual *Long Term Sustained Yield* volume, provided that the decadal average for any given year is equal to or less than this number.

4) Eastside Screens (Regional Forester Amendment to the Forest Plan, implemented in 1995)

DEIS Alternatives R, B, O, and No Action all continue the Eastside Screens direction of prohibiting harvest in stands dominated by trees 21" in diameter or larger. While provisions exist within the Eastside Screens for limited harvest of large trees when specific criteria are met, the Colville Planning Team interpreted these criteria to essentially prevent harvest of large tree dominated stands in any meaningful quantity. To comply with this interpretation of the alternatives that retain the Eastside Screens provisions, calculations of *Long Term Sustained Yield* and *Annual Sale Quantity* assumed that harvest would generally not occur in stands dominated by large trees. Alternatives that replace Eastside Screens (*proposed action & alternative P*) include management direction for retaining and developing large-tree structure across the landscape.



Discussion

In interpreting the results of the modeling for the *Allowable Sale Quantity*, it is important to keep in mind the existing conditions on the ground, currently...*especially as they relate to the application of Eastside Screen restrictions*. Current conditions indicate that a majority of lands suitable for timber production are in the small to medium size classes of timber. While this represents a sizable potential harvest base, scheduling excess harvest in the short term to target this size class would lead to a decrease in available volume in the future while waiting for regrowth from these harvests.

Conversely, harvesting less acreage leads to natural growth of some of the currently medium sized stands into the large size class. Once a stand matures into the large size class, it becomes *unavailable* for timber harvest due to the size cap requirement from Eastside Screens. In this way, it is difficult to provide for both a sustained harvest level *and* prevent maturation of stands into a size-class that is not harvestable under the specified constraints. As a result, a non-declining flow volume is limited to that which can be sustained in the long term.

Calculations for non-declining even flow for each alternative have been developed. These values represent the long term volume that can be produced consistently over time without a decline in future outputs, while adhering to the constraints for each alternative.

The calculation of *Long Term Sustained Yield* assumes that the forest is already within its desired conditions, and looks at how much volume can be produced in perpetuity while maintaining those desired conditions.

The 1982 Planning Rule does contain provisions for developing a departure schedule which allows harvesting excess volume in the short term to better meet multiple use objectives. However, a departure schedule can only be used when doing so would "lead to better attaining the overall objectives of multiple-use management" which, in this case, was not shown to be true.

I understand there is a lot of information in our plan revision documents related to vegetation management. I hope the information in this newsletter helps to clarify a portion of the terminology and analysis.

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Frequently Asked Questions

Is the current budget used to develop a target for restoration/production in the revised plan?

No. The current budget is used to display what might be produced by each of the alternatives if it was implemented and the forest retained its existing funding level. Annual outputs could vary depending on actual funding levels, changes to how funding is received. For example, if more funding is received to support recreation development and less for vegetation management, the work completed by the forest would change by increasing support for recreation projects, and possibly decreasing vegetation management treatments.

Why doesn't at least one alternative incorporate an increased plan for acres of vegetation management (departure schedule) to address the need for acceleration of restoration activities?

The Forest Service uses direction from regulation and policy to analyze forest plan alternatives in a consistent manner that allows the public and Forest Service deciding officials to compare potential outcomes from those alternatives. The 1982 Planning Rule does contain provisions for developing a departure schedule which allows harvesting excess volume in the short term to better meet multiple use objectives. However, a departure schedule can only be used when doing so would "lead to better attaining the overall objectives of multiple-use management" which, in this case, was not shown to be true. There is nothing in the forest plan that prohibits consideration of adjusting amount of vegetation treatment to address restoration needs.

Does the Allowable Sale Quantity used in the Draft Revised Plan take into account that the ASQ listed in the 1988 plan has not been met for several years?

The allowable sale quantity modeled for the draft revised plan is based on the current condition of National Forest System Lands, proposed management area designations and the desired condition for vegetation. By default, the amount of past treatment is reflected in the current condition of the vegetation across the landscape. Therefore, additional review of the past levels of timber harvest is not needed to develop the allowable sale quantity for the draft revised plan.

Why do the listed harvest levels listed in the draft revised plan and draft environmental impact statement not reflect current forest growth rates? Or reflect the long-term sustained yield?

There are a number of reasons why the listed harvest levels do not equal current growth rates. Some of the land base is assigned to management areas that restrict vegetation management or is located in areas that are not currently feasible for vegetation management operations (such as steep, rocky slopes). These areas, although contributing to overall forest growth rates, are not included in the volume (harvest) estimates.

The listed harvest levels are also different from the *long-term sustained yield* since the calculation of *long term sustained yield* assumes that the forest is already within its desired conditions, and looks at how much volume can be produced in perpetuity while maintaining those desired conditions. The forest is not currently within those desired conditions. The draft revised plan is designed to allow vegetation treatments, and time (needed to develop larger diameter trees), to move the landscape closer to those desired conditions.



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