



Via: <https://cara.ecosystem-management.org/Public//CommentInput?Project=54029>

December 17, 2018

Keith Lannom, Forest Supervisor
Payette National Forest
500 N. Mission Street, Building 2
McCall, Idaho 83638

Dear Keith:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Granite Meadows Project (Granite Meadows).

The American Forest Resource Council (AFRC) is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Payette National Forest, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Idaho forest sector employs many Idahoans, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector.

AFRC is glad to see the Payette proposing a large-scale vegetation management project within the within the Little Salmon and North Fork of the Payette subbasins in Adams, Idaho and Valley Counties.

AFRC supports and encourages management on all lands that need treatments to restore forest health and resilience and supports cooperative agreements for treatments on private, state and National Forest System (NFS) lands. These treatments will likely provide useful timber products to our membership. Our members depend on a predictable and economical supply of timber products off the Payette National Forest land to run their businesses and to provide useful wood products to the American public. The treatments on the Granite Meadows project will likely provide short-term products for the local industry and we want to ensure that this provision is an important consideration for the decision maker as the project progresses. As we will

discuss later in this letter the importance of our members' ability to harvest and remove these timber products from the timber sales generated off this project is paramount.

The purpose of the Granite Meadows project is described on page 3 of the proposed action as “a landscape-scale effort to improve conditions across multiple resource areas” and the need for the project is “based on the difference between the existing and desired conditions.” These statements are followed by “the purpose and need for the Granite Meadows Project includes,” and twelve bullet points that appear to be partially combined purpose and need statements. Please rework the purpose and need and clearly articulate the “purpose” followed by the “need” for each bullet point. Both the need and the purpose of the action should be articulated individually. The importance of the timber resource to local and regional forest products infrastructure also must be recognized. Please add **“contribute to a predictable, sustainable supply of timber and other forest products to help maintain the existing forest products infrastructure.”** Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on NFS land particularly those lands designated as commodity emphasis, but also on lands with other designations. Various laws direct and allow the Forest Service to provide a sustainable supply of timber and other forest products from the Nation’s forests including the Multiple-Use Sustained Yield Act (MUSYA) of 1960 and the National Forest Management Act (NFMA) of 1976. The MUSYA authorizes and directs the Secretary of Agriculture to develop and administer the renewable resources of timber, range water, recreation and wildlife on the national forests for multiple use and sustained yield of the products and services. NFMA is the primary statute governing the administration of national forests. This Act requires the Secretary of Agriculture to assess forest lands, develop a management program based on multiple-use and sustained-yield principles and to implement a resource management plan for each unit of the NFS.

The consideration of active management on every acre of appropriate land, regardless of its land allocation, is important to our membership as each year’s timber sale program is a function of the treatment of aggregate forested stands across the landscape. AFRC supports treating as many acres as possible. We urge the Payette to look for ways to maximize treatment where it is proposed and to avoid deferring units or setting aside portions of units for what is often referred to as “skips” (please consider the fact that there will be acres in the project area that will essentially be “skipped”). Skips within the watershed are plentiful, what is not plentiful are openings. If the Payette truly wants to diversify the landscape, then it should focus on creating openings in the forest and minimizing untreated areas within the Granite Meadows planning area.

AFRC strongly supports and encourages treatments in all potential vegetation groups (PVGs) including PVGs 6 through 11, those in cooler moister areas and higher elevations. Please find “Reconciling wildlife conservation to forest restoration in moist mixed conifer forests of the inland northwest: A synthesis” recently published in the Journal of Forest Ecology attached to this letter. The timber products provided by the Forest Service are crucial to the health of our membership and local economy. Without the raw material sold by the Payette the mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they

operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service lands. To be clear, we are advocating that you consider the economic viability of the project and make sure that it is designed in a way that makes sense for the market. This is not the same thing as maximizing economic value of the project.

AFRC requests that the Forest identify some younger growth stands in Granite Meadows that can be managed with a focus on growing and sustaining wood fiber for the future. While it is acceptable to manage for different resource benefits in these stands, such as some larger structure, the main emphasis must be growing trees sustainably to harvest and process for future generations.

Logging contractors must average 10 months of work per year in order to be profitable. Developing the Granite Meadows proposal with that in mind is critical. AFRC advocates allowing as much flexibility as possible within the contract while still meeting the management goals and guidelines contained in the NEPA document. This flexibility allows the purchaser to use the most economically viable systems thus the ability to pay higher stumpage rates. Placing restrictions on the specific machinery to be used severely impacts the economic viability of the timber sale while not improving the end result. Descriptions should be limited to “ground based” or “cable” with a description of the objectives and outcomes desired. Locking in the specific type of logging system in the NEPA document removes flexibility during the implementation stage. Contractual design and packaging on Granite Meadows should be as flexible as possible. It is critical that industry be allowed to develop and provide plans to suitably meet objectives and implement projects to make them more cost effective.

AFRC is concerned about the “decommissioning” and removal from the NFS of 30 to 35 miles of system road. Established road infrastructure provides access for fire and future management and decommissioning of system roads must be carefully analyzed. Please find methods of mitigating the impacts of established system roads that do not require formal decommissioning and allow for re-opening in the future both fire management and fire access purposes.

Riparian conservation areas (RCAs) must be treated to return them to the desired conditions. Commercially valuable material that is cut in the RCAs should be removed to help pay for the project and other restoration work in the area. Please work with forest industry to identify suitable methods of removing this material.

AFRC supports prescribed burning activities but we are concerned that the vast number of acres of existing burn backlog in combination with new projects can be accomplished in a timely manner. Please provide a general plan of how and when prescribed burning is going to be accomplished in the Granite Meadows area.

Carbon sequestration as it relates to climate change is a topic that often gets broadly analyzed in NEPA documents. The analysis that the Forest Service will likely be conducting through the ensuing environmental analysis will discuss forest health benefits, effects on carbon sequestration and storage potential and meeting the purpose and need all within the context of an economically viable timber sale. Granite Meadows consists of a variety of treatments, including precommercial and commercial thinning, which may affect the treated stands ability to resist, respond, or be resilient to climate change in the project area. The direct, indirect, and cumulative effects of carbon sequestration and storage and its relationship to climate change in regard to this project must be viewed at much larger scales than the general project area because the scientific literature regarding these, only support analysis on larger scales. There is a large body of literature on management strategies that have the greatest carbon sequestration benefit. In general, actively managing the forest will produce a positive net increase in carbon sequestration thus a positive benefit to reducing anthropogenic effects on climate change (IPCC, 2007). AFRC urges you to analyze the type of treatments being proposed and determine through the literature how they will affect carbon sequestration potential through time.

Thank you for the opportunity to provide scoping comments on the Granite Meadows project. I look forward to the release of the draft environmental impact statement and the implementation of this project as it moves forward.

Sincerely,

A handwritten signature in cursive script that reads "Irene K. Jerome".

Irene K. Jerome
AFRC Consultant
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John Day, OR 97845