VIA Email: appeals-northern-regional-office@usda.gov

November 10, 2020

Objection Reviewing Officer
USDA Forest Service Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Homestead Project.

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. Many of our members have their operations in communities within and adjacent to the Idaho Panhandle National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC is not writing to submit a formal objection, since the objection period is open, but rather to support your Draft Record of Decision, thank you for responding to some of our comments, and to provide some suggestions regarding project implementation. We still believe that with site specific conditions on the ground, some of our earlier comments to the project can still be implemented. AFRC submitted scoping comments on October 17, 2019, and Draft EA comments on March 3, 2020.

In our scoping and Draft Comments we outlined that we were very pleased to see that one of the purpose and need components is to provide economic benefit to local economies. The National Forests in Idaho are very important for providing the raw materials that sawmills within the state need to operate. The timber products provided by the Forest Service are crucial to the health of

our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Furthermore, studies by the University of Idaho have shown that as many as 18 direct and indirect jobs are created for every million board feet of timber that is harvested. If the Project yields 45 mmbf, this will help provide needed jobs for the communities and revenues for the counties.

While not objecting to the Project, AFRC is still perplexed why the District didn't take this opportunity to treat more acres. The cost of completing this EA was likely high and maximizing acres analyzed and treated would seem like a logical option. AFRC supported the purpose and need for the Project, which we believe really assesses conditions and needs within the Project, those included:

- Establish and maintain resilient forest stand structure and species composition;
- Reduce the potential for high –intensity wildfire while promoting desirable fire behavior characteristics and fuel conditions;
- Maintain or improve water quality, and aquatic species habitat;
- Provide economic benefit to local communities.

AFRC questions how effective is the Forest in achieving the purpose and need when only 7% of the project area is being planned for mechanical treatment?

AFRC supported the Project in other areas including performing 1,146 acres of regeneration harvest. We believe this is needed for many reasons. There are just not enough acres being treated with regen harvest to meet the Forest's needs for early seral habitat and a sustainable supply of timber. AFRC also supports creating openings larger than 40 acres to accomplish the needed forest treatments.

There are about 1,500 acres of land designated for elk security. AFRC has commented on several projects on the Idaho Panhandle recently that have supported the need to manage in these areas to create more early seral rather than having higher percentage of the area in cover. Timber harvest, especially regeneration cuts, in these areas help to establish early seral species elk need for forage. We supported the Forest in making these regeneration harvest cuts, but again, we felt the Forest should have done more of this work in the elk security areas.

Another important point that we hope the Forest considers during implementation is to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the St. Joe market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the

EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Tethered-assist equipment is also becoming a more viable and available option for felling and yarding on steep slopes. This equipment has shown to contribute little additional ground disturbance when compared to traditional cable systems. Please prepare your NEPA analysis documents or allow the flexibility on the ground in a manner that will facilitate this type of equipment.

During project implementation we would like to remind the District that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The 26 miles of road decommissioning proposed in the Homestead Project likely represents a ***permanent*** removal of these roads and the deferral of management of those forest stands that they provide access to. The land base covered in the project area is to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

We would like the St. Joe District to carefully consider the following three factors when making a decision to decommission any road in the project area:

1. Determination of any potential resource risk related to a road segment.
2. Determination of the access value provided by a road segment.
3. Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.

AFRC and our members look forward to working with the St. Joe District as the Homestead Project moves to implementation. We ask that the District review our comments to help in project implementation. We also ask that if there are objections to the Project that a meeting be set up for all objectors to state their positions and try to find solutions. While not agreeing with all aspects of the Project and not submitting a formal objection, we would like to be involved in those discussions as to why we believe the Project should move forward.

Thank you very much for allowing AFRC to provide a support letter for the Homestead Project during the Objection period. We look forward to being engaged with the Forest should a Resolution meeting be required.

Sincerely,



Tom Partin
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