Via: https://www.fs.usda.gov/project/?project=60648.

September 1, 2021

Ronda Bishop, District Ranger
Weiser Ranger District
851 East 9th St
Weiser, ID 83762

Dear Ms. Bishop:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Woodhead South Project (Woodhead). Woodhead is located on the Weiser Ranger District of the Payette National Forest in Washington and Adams counties, Idaho. The project area encompasses approximately 5,150 acres with a variety of resource treatments including 516 acres of commercial treatments. This area is very important and popular to the residents of the area and to AFRC members. The Woodhead proposal is categorically excluded from documentation in an environmental assessment or environmental impact statement because it fits the following categories: Salvage of dead and/or dying trees not to exceed 250 acres, requiring no more than ½ mile of temporary road construction (36 CFR 220.6(e)(13)) *and under the Healthy Forest Restoration Act* Section 603 which establishes a categorical exclusion for qualifying insect and disease projects in designated areas on National Forest System lands. An insect and disease project that may be categorically excluded under this authority is a project that is designed to reduce the risk or extent of, or increase the resilience to, insect or disease infestation in the areas Projects carried out under this authority *may not exceed 3000 acres.* (HFRA, Sections 602(d) and 603(a)). Landscape scale areas may be designated by the Secretary if they meet at least one of the criteria found in HFRA, Sections 602(c)(1)(2) & (3).

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 in that more than 50% of all manufacturing jobs are in wood manufacturing.

Purpose & Need— Restoration and Maintenance within Forested Landscapes 5.1

AFRC supports HFRA and salvage projects. Our members depend on a predictable and economical supply of timber products off Forest Service lands to run their businesses and to provide useful wood products to the American public. The treatments on the Woodhead 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. We would like the Forest Service to recognize this importance by adding a statement to the purpose and need in to clearly articulate the importance of **supporting and maintaining to the forest products infrastructure.** Supporting and retaining local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service land, particularly those lands designated as Management Prescription Category (MPC) 5.1 (Restoration and Maintenance within Forested Landscapes) or Category MPC 5.2 (Commodity Production Emphasis in Forested Landscapes) as allocated and defined by the Payette Forest Land and Resource Management Plan (LRMP). 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 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 keeping 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.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are rigid operating restrictions. We understand that the Forest Service must take necessary precautions to protect natural resources; however, we believe that in many cases there are

conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service NEPA documents and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift 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. This includes seasonal operating restrictions around wildlife areas (such as the Idaho ground squirrel) and waterways. During a meeting on March 3, 2020 at the Payette Forest Supervisor's Office local logging contractors indicated that their businesses were no longer viable due to the extremely short logging seasons on Forest Service projects. They attributed the short seasons to the numerous operating season restrictions in Payette Forest timber sale contracts. The cable logging infrastructure in southwest Idaho is all but extinct. It is absolutely ***imperative*** that the Forest Service recognize the need to retain the existing cable logging infrastructure. Forest restoration to mitigate uncharacteristic wildfire events and promote forest health and resilience through management treatments such as those prescribed for the Woodhead South project is dependent on the retention of local logging and milling infrastructure.

The Woodhead Fire burned from September 7 to November 16, 2020. It is questionable whether there will be any commercial value left in the burned timber by the time contracts are awarded. The extremely hot dry conditions that have prevailed during the spring and summer of 2021 add to that concern. Will there be an optional removal contract provision for the burn salvage areas to address this issue? Has there been any fall, buck and scale done on the burned timber to determine the potential value? The immediate removal of the fire salvage is urgent.

During a field trip to the Woodhead project area on July 29, 2021 the group visited an area where "patch cuts" were recommended as the most appropriate silviculture tool to treat the stands. AFRC fully agreed that this would be an appropriate management strategy for the area. These acres will likely require replanting due to canopy cover typically less than 10% with 5-10 trees per acre. Stands will be regenerated as needed with appropriate species for the site. AFRC strongly recommends that the Forest carefully evaluate the appropriate number of seedlings per acre to plant given the current forest management strategy of leaving larger older trees across the landscape with limited precommercial thinning entries. During the years of intensive management on Forest Service lands, when sustained yields and timber production were the driving focus, it was appropriate to plant in excess of 400 trees per acre because the intent was to have several future entries where stands would thinned. Intensive forest management for timber production is no longer the overriding goal for most projects. Currently one of the major issues encountered is the high cost of small tree thinning to enhance forest health and resilience and to mitigate the potential for uncharacteristic wildfire moving across the landscape. Plant an appropriate number of trees, perhaps around 200 per acre at a 15 x 15 spacing, to address this issue. A certain amount of natural regeneration will take place as well.

Road Decommissioning

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. Approximately three miles of road are proposed for decommissioning on the Woodhead project for watershed improvement purposes which likely represents a ***permanent*** removal of these roads. The Forest Service's custodial role for the land base in the Woodhead project area is encompasses a variety of objectives including timber management, fire suppression and access for county search and rescue personnel. 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 Weiser 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.

Approximately three tenths (0.3) of a mile of temporary road will be constructed on the Woodhead project. Closing of this temporary road is described as "decommissioning" in the scoping document which is not the appropriate terminology.

Carbon Literature

We would like to encourage the Weiser District to consider several documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when comparted to no harvest by the end of the simulation.

- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. Ecosphere 7(1):e01224. 10.1002/ecs2.1224

Key points of the Gray paper include:

- Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the sequestration of carbon from atmospheric CO2, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

Thank you for the opportunity to provide scoping comments on the Woodhead project I look forward to following the implementation of this project as it moves forward. Please feel free to contact me if I can assist you with determining the economic feasibility of silviculture treatments and logging system requirements.

Sincerely,

Irene K. Jerome

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