



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

May 10, 2022

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 provide supportive comments during the Objection Period for the Rosie Cedar 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.

On April 8, 2022, the Coeur d'Alene Ranger District announced that it had prepared an environmental assessment (EA) and a draft decision notice and finding of no significant impact (DN/FONSI) for the Rosie Cedar project. The approximately 14,400-acre project area is located on National Forest Service lands south of the Interstate 90 corridor, through Kootenai County, between Highway 97 and Highway 3 on the Coeur d'Alene River Ranger District east of Coeur d'Alene, Idaho. AFRC has supported the Project in its development and provided pre-scoping comments on October 29, 2020, and scoping/Draft EA Comments on November 10, 2021. AFRC is not writing this letter to Object to the Project, rather this letter is in support of the Project moving forward quickly due to its focus of fuels reduction and forest health work planned.

AFRC continues to support the Purpose and Need for the Project which includes:

- Disease management to improve forest health and resilience of the stands and project area
- Road decommissioning to ensure resource protection in the future.
- Support of local economies through the harvest of timber.

Some of the main points from our Scoping/Draft EA letter that we would like to emphasize include:

1. AFRC supported the Forest combining the scoping and Draft EA comment into one 30-day comment period to expedite the planning process. During both of the comment periods we suggested that more acres be commercially treated to better accomplish the Project's purpose and need. The 3,775 acres of commercial harvest represents 27% of the Project area. While AFRC would like to see as many acres treated as possible, we realize that there are competing uses for the land and this represents a fairly large footprint.

However, it is important for the Forest to understand that treating a larger portion of this Project area commercially and others being planned would be helpful to support the local sawmills and infrastructure by providing raw material. The National Forests in Idaho are very important for providing the raw materials that local sawmills 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. Specifically, studies in Idaho have shown that 18 direct and indirect jobs are created for every one million board feet of timber harvested. Without this material, our members would 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 forestland.

2. Due to the insect and disease problems in the Project area, it is likely that regeneration harvests will be necessary to address forest health issues. AFRC supported creating openings larger than 40 acres if needed to address these problems. Regeneration harvest is also an integral component of a vegetation management program that strives to ensure a sustainable supply of timber products. AFRC supports a forest plan amendment requesting the use of openings larger than 40 acres. Regional Forester approval for creating openings greater than 40 acres was received by the District on March 15, 2022, which will allow the use of this tool.

Our members depend not only on a near-term supply of timber but also on the understanding that that supply will be available in the long-term. AFRC has voiced our concerns in the past regarding the sustainability of a vegetation management paradigm comprised exclusively of thinning and have repeatedly stressed the importance of incorporating a regeneration component into this paradigm. We did urge the Coeur d'Alene Ranger District to consider incorporating the objective of sustained-yield timber management into the project's purpose & need statement to capture this important aspect of your management plan and the Forest Service's overall mission. We hope that you will consider this on future projects.

These larger openings will also help to trend this area towards the vegetative desired conditions providing a mosaic of age classes. Hardwood, shrub, and grass species are important sources of high-quality forage for deer and elk as they prepare for winter, over winter, and in the spring as they begin to replenish lost body mass from the previous winter.

This proposal would retain and enhance aspen and provide valuable forage by reinvigorating existing shrub and grass communities making them more palatable and nutritious for big game species and other terrestrial wildlife. Abundant documentation was included in the Draft EA regarding the need to enhance elk forage. The Forest has done a good job of utilizing regeneration harvests in the Project area, however AFRC believes more of these treatment acres should have been included.

3. As you move into the implementation of the Project, we would like to remind the District that 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 forestland.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not aligned with many of the restrictions described in Forest Service EA's and contracts

The table below shows the proposed acres by logging systems.

Table 2. Proposed vegetation treatments by logging system type

Logging System	Estimated Acres
Ground based (Tractor)	553
Cable (Skyline)	672
ORSY (Off Road Skyline Yarding)	836
Swing System (mix of Ground, Cable, and ORSY)	1715
Hand Crew	423
TOTAL TREATMENT ACRES	4,198

We would like the Forest Service 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 Idaho Panhandle National Forest market area with a variety of skills and equipment. Developing an EA 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 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 may be planned for cable harvest, there may be opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. While we appreciate the language allowing ground skidding to occur on slopes over 35% if approved, we would like the Forest to allow ground-based equipment to operate on slopes up to 45%. 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. It would be helpful if you would prepare your NEPA analysis documents in a manner that will facilitate this type of equipment.

Finally, AFRC would like the Forest to examine the days that logging operations and timber haul are shut down due to hunting seasons and other outdoor recreation. The logging community has a limited operating time at best, and further reductions such as these only makes surviving in the logging business that much more difficult

4. As we mentioned in our Draft EA, for the most part AFRC supports the Road Management Plan which calls for construction of 19 miles, reconstruction of 47 miles, reconditioning 3 miles, maintenance on 15 miles, and 11 miles of temporary roads.

We would like to highlight the 9 miles of road proposed for decommissioning. We would like to remind the Forest that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products in the general timber designated lands. 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 land base covered in the Rosie Cedar 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. Roads proposed for decommissioning should be assessed to determine if objectives could be met instead by road closure using barriers or blockage of the road entrances. AFRC does not support obliteration or recontouring roads that are to be decommissioned because of the high cost involved. The project is already very uneconomical.

Furthermore, there are alternative methods to mitigating potential resource damage caused by poorly designed or poorly maintained roads aside from full decommissioning. Removing or replacing ineffective culverts, installing waterbars, and blocking access are all activities that can mitigate resource damage while maintaining useful roads on the landscape for future use. Please consider these methods as an alternative to full decommissioning.

AFRC believes that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to attack fires quickly and directly. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.

If the Forest Service proposes to decommission, abandon, or obliterate road segments from the Rosie Cedar Project area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will enable fire fighters quicker and safer access to suppress any fires that are ignited.

We would like the District to carefully consider the following three factors when deciding to decommission any road in the project area:

- Determination of any potential resource risk related to a road segment.
- Determination of the access value provided by a road segment.

- 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.

7. AFRC believes that the use of Designation by Prescription might be a good option for designating the trees to be harvested and those to be retained especially in commercial thinning, seed tree, and shelterwood harvests. The goal of the Project is to remove shade tolerant species such as grand fir, western red cedar, and western hemlock and shift towards more western larch, western white pine, and ponderosa pine. Prescriptions can be written to accomplish this.
8. In the Draft EA it was stated that the project would not have a discernible impact on atmospheric concentrations of greenhouse gases or climate change. Carbon sequestration was programmatically analyzed in the Forest Plan FEIS.

We would like to encourage the Coeur d'Alene 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 compared 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.

Gustavsson, L., Madlener, R., Hoen, H.-F., Jungmeier, G., Karjalainen, T., Klöhn, S., ... Spelter, H. (2006). The Role of Wood Material for Greenhouse Gas Mitigation. *Mitigation and Adaptation Strategies for Global Change*, 11(5–6), 1097–1127.

Lippke, B., Oneil, E., Harrison, R., Skog, K., Gustavsson, L., Sathre, R. 2011 Life cycle impacts of forest management and wood utilization on carbon mitigation: knowns and unknowns, *Carbon Management*, 2:3, 303-333.

McKinley, D.C., Ryan, M.G., Birdsey, R.A., Giardina, C.P., Harmon, M.E., Heath, L.S., Houghton, R.A., Jackson, R.B., Morrison, J.F., Murray, B.C., Pataki, D.E., Skog, K.E. 2011. A synthesis of current knowledge on forests and carbon storage in the United States. *Ecological Applications*. 21(6): 1902-1924.

Skog, K.E., McKinley, D.C., Birdsey, R.A., Hines, S.J., Woodall, C.W., Reinhardt, E.D., Vose, J.M. 2014. Chapter 7: Managing Carbon. In: *Climate Change and United States Forests, Advances in Global Change Research* 57 2014; pp. 151-182.

AFRC strongly believes that in the absence of commercial thinning, the forest where this proposed action would take place would thin naturally from mortality-inducing natural disturbances and other processes resulting in dead trees that would decay over time, emitting carbon to the atmosphere. Conversely, the wood and fiber removed from the forest in this proposed action would be transferred to the wood products sector for a variety of uses, each of which has different effects on carbon (Skog et al. 2014). Carbon can be stored in wood products for a variable length of time, depending on the commodity produced. It can also be burned to produce heat or electrical energy or converted to liquid transportation fuels and chemicals that would otherwise come from fossil fuels. In addition, a substitution effect occurs when wood products are used in place of other products that emit more GHGs in manufacturing, such as concrete and steel (Gustavsson et al. 2006, Lippke et al. 2011, and McKinley et al. 2011). In fact, removing carbon from forests for human use can result in a lower net contribution of GHGs to the atmosphere than if the forest were not managed (McKinley et al. 2011, Bergman et al. 2014, and Skog et al. 2014). The IPCC recognizes wood and fiber as a renewable resource that can provide lasting climate-related mitigation benefits that can increase over time with active management (IPCC 2000). Furthermore, by reducing stand density, the proposed action may also reduce the risk of more severe disturbances, such

as insect and disease outbreak and severe wildfires, which may result in lower forest carbon stocks and greater GHG emissions.

Thank you for the opportunity to provide a letter of support for the Rosie Cedar Project during the Objection Period. I look forward to following this Project as it moves to implementation in the coming years.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Tom Partin
AFRC Consultant
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Portland, Oregon 97239