https://www.fs.usda.gov/project/?project=63507

March , 2023

Linda Jackson, Forest Supervisor
Payette National Forest
500 N. Mission St. Bld. # 2
McCall, ID 83638

Dear Linda:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments Granite Goose Landscape Restoration Project (Granite Goose). The Granite Goose Landscape Restoration Project is located on the McCall and New Meadows Ranger Districts north and east of New Meadows, Idaho and north and west of McCall, Idaho on the Boise Meridian, within Adams, Idaho, and Valley counties. The project area is approximately 39,918 acres and contains 33,346 acres of National Forest System (NFS) lands, 5,371 acres of State of Idaho lands, and 1,105 acres of private lands. Through Wyden Amendment (P.L. 109-54, Section 434) proposed treatment activities may occur on State and private lands within the project area boundary provided there are agreements between the Payette National Forest (PNF), the Idaho Department of Lands, and/or willing private landowners. Harvest treatments will produce a significant volume of merchantable timber, will reduce fuel loads, and will help restore forest health on both public and private lands. This area is very important and popular to the residents of the area, and to AFRC members.

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 PNF. The management of these lands ultimately dictates, not only the viability of their businesses, but also the economic health of the communities themselves. Rural communities, such as the ones affected by this project, are

particularly sensitive to the forest product sector because more than 50% of all manufacturing jobs are in wood manufacturing.

Purpose & Need—The Purpose of the Granite Goose Landscape Restoration Project is to Reduce Fuel Loading Adjacent to Communities, Maintain and Improve Conditions for Forest Vegetation, Watershed Conditions, and Recreation Resources thus Moving the Project Area Toward the Desired Conditions

AFRC strongly encourages treating as many acres that are in need as possible, and strongly encourages treatment of the majority of timber stands, either through free thinning across all age classes or through regeneration harvests within the Granite Goose planning area. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. The treatments on the Granite Goose project will likely provide short-term products for the local industry, and we want to ensure this provision is an important consideration for the decision-maker as the project progresses. The consideration of active management on every acre of appropriate land, regardless of its land allocation, is important to our membership, because each year's timber sale program is a function of the treatment of aggregate forested stands across the landscape. As we will discuss later in our comments, the importance of our members' ability to harvest and remove these timber products from the timber sales generated off this project is paramount to a principal objective to any project proposed on the National Forest System (NFS), land particularly those lands designated as commodity emphasis, but also on lands with other designations. 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 lands. AFRC asks that on page 9 under the "Need" discussion that the PNF include "the Need to maintain local forest products infrastructure to treat these lands now and in the future".

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. We appreciate the Payette's comprehensive land management approach and proposing regeneration harvest treatments as a component of this project. A management paradigm based exclusively on intermediate thinning treatments is ultimately unsustainable without a regeneration component. We urge you to acknowledge and emphasize this notion in the final analysis.

Operations

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. 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 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 in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). 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 New Meadows/McCall 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. AFRC appreciates the absence of fixed slope percentages and the resulting flexibility in the Granite Goose scoping document. Please carry this flexibility over to the final EA to allow a variety of equipment in the sale areas that best will allow for on the ground resource objectives to be met. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. There are opportunities to use certain ground equipment such as fellerbunchers and processors in many areas. The loss of cable logging infrastructure in the west central Idaho area makes the need to utilize other equipment essential. 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.

The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. Tethered-assist logging is becoming a more economical, safe, and available method of yarding on steep slopes throughout the region. We appreciate the acknowledgment of this system in the scoping package. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. Other Forests in the Region and neighboring Regions have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. Other Forests in Regions 1, 4 and 6 have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%.

Green, P. Q., Chung, W., Leshchinsky, B., Belart, F., Sessions, J., Fitzgerald, S. A., Wimer, J. A., Cushing, T., Garland, J. J. (2019). Insight into the productivity, cost and soil impacts of cable-assisted harvester-forwarder thinning in western Oregon. *For. Sci.* 66(1):82–96

Key Point of the Green paper include:

- The use of cable assistance can reduce track coverage and reduce shear displacement, and thus likely lessen potential soil impact caused by forestry machines.

Garland, J., F. Belart, R. Crawford, W. Chung, T. Cushing, S. Fitzgerald, P. Green, *et al.* 2019. Safety in steep slope logging operations. *J. Agromedicine* 24(2):138–145.

Key Point of the Garland paper include:

- Use of new tethered-assist technology reduces exposure to hazards and reduces workers exposed to the most dangerous work in logging—felling and working on cable operations on steep slopes.

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. Logging contractors must average ten (10) months of work per year in order to be profitable, and cable logging infrastructure has all but disappeared in western Idaho due to safety and workforce issues. Developing the Granite Goose project with that in mind is

critical. This flexibility allows the purchaser to use the most economically viable systems, and thus increases the ability of the purchaser 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. Locking in the specific types of logging systems and equipment in the NEPA document removes flexibility during the implementation stage. Analyzing areas for "tractor/tethered assist" and working with industry on the ground during implementation will provide for best meeting restoration objectives that are economically viable.

Green, P. Q., Chung, W., Leshchinsky, B., Belart, F., Sessions, J., Fitzgerald, S. A., Wimer, J. A., Cushing, T., Garland, J. J. (2019). Insight into the productivity, cost and soil impacts of cable-assisted harvester-forwarder thinning in western Oregon. For. Sci. 66(1):82–96

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- The use of cable assistance can reduce track coverage and reduce shear displacement, and thus likely lessen potential soil impact caused by forestry machines.

Provisions that would allow for removal of biomass and nonmerchantable material that is subject to agreement may be necessary on Granite Goose. Flexibility on the product removal side will be key to effective implementation and meeting objectives on the Granite Goose project.

Purpose & Need – Move Subwatersheds Within the Project Area Toward Desired Conditions for Soil, Water, Riparian, and Aquatic Resources Riparian Habitat Conservation Area Management

AFRC fully supports treatments in riparian habitat conservation areas (RHCAs) and encourages the Forest to maximize treatment of those stands in need. RHCAs are the most productive areas on the landscape and change rapidly over time. The next entry may be too late given the extreme fire seasons that this area has been experiencing over the last decade. We would like the District to consider the document cited below, which is specific to riparian management in dry forest landscapes. We believe this paper emphasizes the need to actively manage these riparian areas to meet the stated objectives described in the scoping notice for this project.

Messier, Michael S., Shatford, Jeff P.A., and Hibbs, David E. 2011. Fire Exclusion effects on riparian forest dynamics in southwestern Oregon. *Forest Ecology and Management*. 264 (2012) 60-71.

Key points of the Messier paper include:

- Fire exclusion has altered the structure, composition, and successional trajectory of riparian forests in fire-prone landscapes.
- Fire exclusion has been associated with increase in tree density and recruitment of shade-tolerate species that may replace large diameter, more decay-resistant Douglas-fir trees.
- A hands-off management regime for these riparian forests will have ecologically undesirable consequences.

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. The road decommissioning proposed in the Granite Goose scoping notice likely represents a ***permanent*** removal of these roads, and likely the deferral of management of those forest stands to which they provide access. The land base covered in the Granite Goose project area are to be managed for a variety of forest management objectives. Removal of adequate future access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us. We would like the PNF 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.

Carbon/Climate

Please consider the points below from a technical report by the Climate Change Vulnerability Assessment and Adaptation Project (SWOAP) in Southwest Oregon.

- Wood harvested from the forest, especially timber used for durable structures, can be reservoirs of long-term carbon storage (Bergman et al. 2014).
- Forests and their products embody a closed-loop system in which emissions associated with harvests and product use are eventually recovered as forests regrow.
- Although products may be retired in solid waste disposal sites, they decompose quite slowly, causing carbon to continue to be stored for many decades.

- Products derived from the harvest of timber from national forests reduce carbon emissions by substituting for more energy-intensive materials including concrete, steel, and plastics.

Please see the graph below from the IPCC (2007) that captures the ability of forests to "stack" carbon sequestration and storage through continual harvests. **Please consider adopting this graph into the final Granite Goose project analysis.**

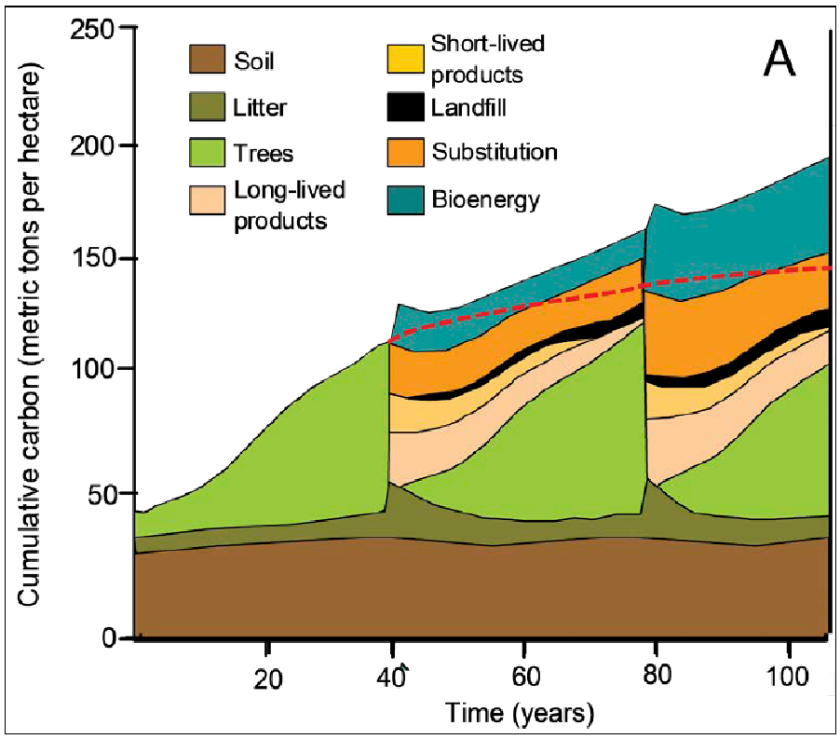

Figure 8.7—Carbon balance from a hypothetical forest management project in which the forest is harvested roughly every 40 years from land that started with low forest carbon stocks. This figure accounts for forest regrowth and carbon stored in wood products in use and landfills as well as the prevented release of fossil fuel carbon (also counted as stored carbon) via product substitution and biomass energy. It illustrates how forests can continue to accrue carbon over time with forest management. Figure is from McKinley et al. (2011) and adapted from IPCC (2007).

We believe that this graph encapsulates the forest management paradigm that would be most effective at maximizing carbon sequestration on a per-acre basis by "stacking" storage in wood products and regrowth of newly planted trees.

We would like to encourage the Districts 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.

Thank you for the opportunity to provide scoping comments on the Granite Goose project. We appreciate the comprehensive and holistic treatments proposed and we 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,

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