Project Link: https://www.fs.usda.gov/project/?project=60853

May 9, 2023

Lacy Lemoosh Project
222 South 7th Street Ste. 1
St. Maries, Idaho 8386

Dear Project Leader:

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

The Lacy Lemoosh project is located primarily on National Forest System lands on the St. Joe Ranger District, south of Emida, Idaho in Benewah and Latah Counties. The project area is approximately 16,100 acres with approximately 50 acres of privately owned lands within the project area. The Lacy Lemoosh project is a high priority vegetation and fuels management project in the revised Integrated Vegetation and Fuels Management 5-10-year action plan for the Idaho Panhandle National Forest.

Having visited the area and observing some of the forest health conditions , AFRC agrees that active management in the area is needed. The location of the Project in respect to the Wildland Urban Interface also justifies treatment. The Forest has identified four Needs for Action that AFRC supports, those include:

- Improve forest health and resiliency to disturbances such as wildfire, drought, insects or diseases.

- Reduce hazardous fuels within the wildland urban interface (WUI) and other areas to lessen the
  severity of wildfires and to enable safe fire suppression efforts.
- Provide economic benefit to local communities through sustainable use of natural resources and
  benefits for local communities.
- Reduce sediment delivery to streams from forest routes to maintain or improve Total Maximum
  Daily Load (TMDL) related water quality concerns and recover degraded aquatic habitat for native species.

While AFRC supports the Project, we offer the following points that we believe will enhance and improve the analysis going forward.

1. The proposed treatments include commercial treatment of 4,400 acres, which represents 27% of the Project area. AFRC encourages the Forest to treat as many acres as possible in each NEPA analysis to achieve the best economy of scale for the time and effort spent. If there are other areas in the project area that need treatment to meet the purpose and need based on stand exams, we would encourage you to add those acres into the analysis. This will probably be the only entry into this area for two decades and the Forest should focus on maximizing necessary treatments under this EA.

   The majority of the NFS lands in the project area are considered suitable for timber production which has the potential to provide economic benefit through sustainable use of natural resources and benefits for local communities. Maximizing treatment acres will also result in additional harvest of commercial volume. This will generate more K-V funds or retained receipts that can be directed to additional restoration service work and more sawlog volume that is needed by the local sawmills. 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.

   The estimates from the five-year plan for merchantable timber in the Lacy Lemoosh project are 85 million board feet (MMBF). Modeled volume and current market values

analysis show that the proposed timber sales from this project are anticipated to exceed the cost of implementing the project. One sale from this project is proposed to be completed under the Good Neighbor Authority. Again, AFRC suggests looking at additional treatment areas to generate more timber volume for a variety of economic and restoration values.

2. AFRC supports the even-aged regeneration harvests proposed in areas where forest health issues are prevalent. Even-aged treatments include clearcutting, seed-tree, or shelterwood methods. With the mixture of stand ages, species, and conditions, these will be the most appropriate tools to treat the forest. The goal is to retain or replant fire resistant species such as western white pine, western larch, or ponderosa pine.

   Some of the uneven-aged treatments needed to address the forest health crisis in the area may require harvest areas larger than 40 acres. There is an abundance of two highly susceptible hosts of Armillaria root disease, Douglas-fir, and grand fir. The proposed silviculture treatment plan includes 50 openings. Twenty-one of those openings would exceed 40 acres in size (ranging in size from 53 acres to 690 acres) and 29 openings would be less than 40 acres in size (totaling about 350 acres). As part of the project planning, the Forest Supervisor will seek Regional Forester approval for even-aged regeneration openings that exceed 40 acres. A 60-day public notification is initiated through this project scoping letter and legal notice in the Coeur d'Alene Press. AFRC would like to go on record as supporting the request to create openings larger than 40 acres to address the forest health crisis.

   Finally, regarding silvicultural treatments, the Forest has opted not to treat any of the 400 acres identified as old growth within the Project area. AFRC supports this decision due to recent court decisions and the ongoing inventory old growth process.

3. The map shows a total of 61 ground based skidding units totaling 1,275 acres and 71 skyline units totaling 1,850 acres. We would like the District to recognize that one of the primary issues affecting the ability of our members to feasibly deliver logs to their mills is 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 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 Idaho Panhandle market area with a variety of skills and equipment. Developing this 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 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 feller-bunchers 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. Please prepare your NEPA analysis documents in a manner that will facilitate flexibility in the use of various types of equipment. AFRC believes that with some of the lighter touch logging methods as mentioned above, the impacts could even be less than those analyzed.

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

4. Road decommissioning is proposed for about 22 miles in the project area; 4 miles are proposed decommissioning from existing system roads and 18 miles are proposed decommissioning from non-system roads.

   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 forest plan directs the Idaho Panhandle to manage the land base covered in the Lacy Lamoosh Project for a variety of objectives, including timber management, hazardous fuels reduction, and forest health. 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 Lacy Lamoosh 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.

5. AFRC supports the road improvements to reduce sediment delivery and improve stream temperatures as mentioned in one of the Needs. This work would include new road construction that would add eleven crossings on non-fish bearing streams and four crossings on stored roads which are to be reconstructed for project implementation. Targeted road maintenance on the existing road system and project design features for newly constructed stream crossings on new roads would minimize sediment increases in project area streams. The proposed action is expected to reduce open system road mileage within Riparian Habitat Conservation Areas (RHCA) from approximately 15.5 miles to 13.5 miles. This reduction in RHCA road miles combined with the proposed sediment delivery reductions from roads and trails would maintain, and may improve, stream temperatures.

6. AFRC would like the Forest to consider implementing shaded fuel breaks along some of the major ingress and egress roads to meet the project objective of WUI protection. These shaded fuel breaks should extend to at least 200 feet on each side of the road for not only fuel breaks, but also to improve forest health.

7. The silvicultural treatments to improve forest health and reduce hazardous fuels would also support the local elk herd found in Elk Management Unit 6-8. Proposed treatments would improve elk forage opportunities in the project area and benefit local elk populations. Additionally, proposed treatments will improve forage opportunities for other big game species throughout the project area. AFRC views this work as a real win/win.

8. We assume that the Forest Service will analyze the project's impact on carbon sequestration and climate change. We also assume you will be relying on how carbon sequestration was programmatically analyzed in the Forest Plan FEIS.

   We would like the Forest to supplement their carbon analysis in the EA by considering 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 the graph below into the Lacy Lamoosh project analysis.

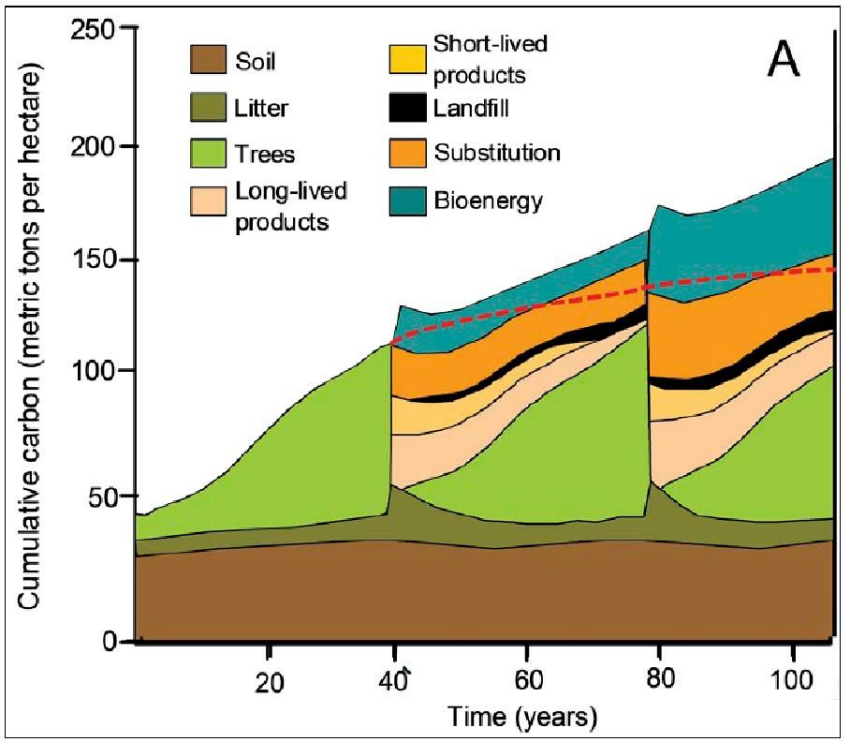

Figure 8.7—Carbon balance from a hypothetical forest management project in which the forest is harvested roughly every 40 years from land that started with low forest carbon stocks. This figure accounts for forest regrowth and carbon stored in wood products in use and landfills as well as the prevented 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 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 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 (Gustavasson 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 scoping comments on the Lacy Lamoosh Project on the St. Joe Ranger District. If implemented effectively, we believe this project will successfully enhance the many resources outlined in the scoping document.

Sincerely,

Tom Partin
AFRC Consultant
921 SW Cheltenham Street
Portland, Oregon 97239