



VIA Link: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65076>

February 26, 2024

Reviewing Officer
Northern Regional Office
26 Fort Missoula Road
Missoula, MT 5980

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide a letter of support for the Sourdough Sheep Project which is currently in the Objection period.

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 Nez Perce-Clearwater 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 writing this letter to support the Draft Decision for the Sourdough Sheep Project. AFRC provided scoping/draft EA comments for the Project on November 20, 2023. At that time, we supported the Purpose and Need to improve forest health and support local and regional economies and forest management infrastructure.

Key issues that AFRC supports the Project include:

1. The Decision proposes 842 acres of regeneration harvests. Regeneration harvest is proposed as the most appropriate management tool to restore early seral species (western white pine, western larch, and ponderosa pine) to the landscape and to meet multiple

resource objectives. AFRC supports the use of regeneration harvest as a critical component of sustainable timber management.

2. AFRC supported the Forest's decision to create three openings greater than 40 acres in size that will require approval from the Regional Forester. AFRC supports the creation of these larger openings to reestablish healthier stands. We also expressed our support during the 60-day comment period addressing these larger openings.
3. AFRC voiced our concerns about the Project being uneconomical due to required biomass removal and other factors. Markets for this type of material are sparse in this region. Where markets do exist, the harvest and delivery of this material remain marginally economical. AFRC wants to assist the Forest Service in attaining its desired end results, even when those results warrant the removal of non-saw material from the forest floor.

We appreciate that the District analyzed the economics of the Project: *"This alternative has a stumpage value of \$1,069,589. After subtracting the base value that includes the costs of reforestation, the resulting appraised value equals \$204,401. This represents a positive sale offering. The financial viability of Alternative 2 suggests that value exists to entertain the opportunity to implement an Integrated Resource Timber Contract and complete a portion of the non-sale related activities. Current guidance is to use up to 75% of the value above base rates for including mandatory service work items."* However, we still caution the Forest Service on the viability of accomplishing these treatments.

4. In our scoping comments we discussed logging systems on steeper ground. We explained that 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 safe, viable, and available option for felling and yarding on steep slopes. This equipment has been shown to contribute little additional ground disturbance when compared to traditional cable systems.

AFRC appreciates the Forest's direction on this: *"In all units, ground-based equipment will only operate on slopes less than 45% and tractor skidding will only occur on slopes less than 35%. Exceptions can be authorized where mitigation measures are applied and soil, slope and equipment are determined appropriate to maintain soil function."*

5. AFRC appreciates the District's discussion on carbon cycling and storage in the document. *"The proposed action would remove some carbon currently stored in biomass by cutting and removing these trees and clearing right-of-way for temporary roads. Carbon would remain stored for a period of time in wood products (Depro et al. 2008;*

2008; Lippke et al. 2011), reducing some of the carbon that would be emitted sooner through processes of decomposition by remaining on site.

In the context of regional and global carbon stocks the proposed action is consistent with internationally recognized climate change adaptation and mitigation practices. Artificial regeneration of native species is expected to speed up the recovery and re-establishment of forested stands."

Carbon cycling and storage are important issues to analyze, and we believe the District adequately addressed how the Project impacts both of these factors.

6. AFRC commented on the proposed riparian work in the scoping notice, and pointed out that the Sourdough Sheep Project is designed to protect water quality and the beneficial uses of water and to maintain the integrity of streams using Riparian Habitat Conservation Areas, Design Features, and Best Management Practices. AFRC believes that managing in the riparian areas can help to achieve these goals.

AFRC is pleased to see that the District has stated that "management in the riparian areas can take place and that standard BMPs and design elements would be applied to protect riparian areas and aquatic resources and to make impacts to the aquatic environment negligible. INFISH standards and BMPs would be applied to project area streams, so water withdrawal/harm to fish would not occur unless the proposed sites, timing, and equipment is determined by the zone fisheries biologist to be consistent with INFISH/ Forest Plan and have negligible effects to fisheries resources."

Thank you for the opportunity to provide a letter of support for the Sourdough Sheep Project. We look forward to its implementation later this year.

Sincerely,

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

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