VIA Link: https://cara.fs2c.usda.gov/Public//CommentInput?Project=57504

June 5, 2024

Reviewing Officer
Northern Regional Office
Attn: Section 16
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 a letter of support for the Section 16 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.

The Section 16 Project has been in the planning stages for several years and AFRC submitted a scoping letter for the Project on April 2, 2020. It is our understanding that the Forest pursued coordination with the Nez Perce Tribe and other stakeholders to seek opportunities for alignment on multiple facets of the project. The Section 16 project is located on the Lochsa-Powell Ranger District within the Nez Perce-Clearwater National Forests. The project area is located in Idaho County approximately two miles north of Powell, Idaho. The Section 16 project area encompasses approximately 640 acres.

AFRC supports the Project design features that focus on the economic benefits to local rural communities, the increase in early seral species composition, and the maintenance of a mixed

species diversity of forest vegetation. The proposal is needed to increase the average diameter of trees within the project area, retain large trees on the landscape, and provide optimum and sustained production of wood products as directed in the Clearwater Forest Plan.

In our earlier comments we pointed out that we were pleased to see that one of the Needs for this Project is to provide economic benefits to local rural communities. The sawlogs from this Project will help AFRC members who depend on a predictable and economical supply of timber products from Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present day needs but also important for needs in the future. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments affect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times regarding the long-term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. While the treatments on the Section 16 Project are unlikely to directly address this long-term sustainability concern, they 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 by this project is paramount. Studies by the University of Idaho have shown that as many as 18 direct and indirect jobs are created for every million board feet of timber that is harvested. The volume harvested in this project will greatly help industry and surrounding communities.

AFRC had some concerns regarding the District's plan to treat 380 acres within Section 16 using an intermediate harvest regime. While we agree that intermediate treatment would reduce the current stand density within the unit to improve species composition by removing grand fir, subalpine fir and other late seral species and retaining early seral species where they exist, it may not be the best tool for treatment of these stands. The table below illustrates how many single-story stands comprised of shade tolerant grand fir/grand fir mix with some spruce and subalpine fir (Table 2 below) exist in the Project area. Shade-intolerant species (western larch, lodgepole, ponderosa pine, Douglas-fir) make up 8% of the project area and are underrepresented in the landscape.

Table 2. Species composition within the proposed treatment unit for Section 16

Species	Acres of Treatment Area	Percent (%) of Treatment Area
Grand fir	136	36
Subalpine fir	6	2
Engelmann spruce	45	12
Shade-tolerant mix	132	35
Western redcedar	4	1
Lodgepole	2	1
Shade-intolerant mix	32	8
Sparse vegetation	2	1
Shrubs	19	5
Totals	**379**	**100%**

This species composition affected by forest health and fuel conditions should compel the Forest to consider using regeneration harvests to attain the desired future conditions. These regeneration harvest areas may need to be larger than 40 acres which AFRC would support seeking Regional approval to implement. Regeneration harvests would improve forest health, reduce heavy fuels loading, increase shade intolerant species, and increase forage for big game. The record state that you considered AFRC's comments regarding regeneration harvest but chose to maintain intermediate harvests.

We appreciate the District considering our comments and responded by stating: *"Although regeneration harvests would improve forest health, reduce heavy fuels loading, increase shade intolerant species, and increase forage for big game this was considered but eliminated from detailed study because timber within this area have not reached culmination of net growth (rotation age).*" AFRC still believes there is opportunity for regeneration harvest which would convert some of the stands to fire tolerant species that are adapted to this landscape.

The District has laid out guidelines for logging systems that states: *"Appropriate available harvest systems would be utilized to accomplish harvest. Ground-based equipment would be limited to slopes less than 45 percent. Skidding equipment would be limited to slopes less than 35 percent, and cable logging systems would be used in areas with steeper slopes."*

As we pointed out in our scoping comments 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. This includes the maximum spacing of skid trails to 80 feet. There are a variety of operators that work in the Nez Perce-Clearwater 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. 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 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 been shown to contribute little additional ground disturbance when compared to

traditional cable systems. Please prepare your NEPA analysis documents in a manner that will facilitate this type of equipment. AFRC is pleased to see that ground skidding on this project will be allowed on slopes up to 45%.

Finally, AFRC is very pleased to see that you supplemented the EA by including a detailed section on Carbon and Climate Change. We are particularly pleased that you included the following information: *"The wood and fiber removed from the forest from timber harvesting will 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. Wood can be used in place of other materials that emit more GHGs, such as concrete, steel, and plastic (Gustavsson et al., 2006; Lippke et al., 2011; McKinley et al., 2011)."*

AFRC would like to reiterate our position on road management. AFRC supports your roads plan for this Project which includes 5 miles of road reconditioning, 4 miles of road reconstruction, 0.6 miles of new road construction and 0.5 miles of temporary road construction. The Forest is planning on decommissioning 1 mile of road by recontouring to natural hillslopes which would eliminate sediment input into streams as well as prevent motorized access. AFRC 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. 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 Section 16 EA likely represents a ***permanent*** removal of these roads and likely the deferral of management of those forest stands that they provide access to. The land base covered in the Section 16 Project area are 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.

We would like the District to carefully consider the following three factors when deciding 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.

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 quickly and directly attack nascent fires. 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.

If the Forest Service proposes to decommission, abandon or obliterate road segments from the planning 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 firefighters to have quicker and safer access to suppress any fires that are ignited.

Thank you for the opportunity to comment on the Section 16 Project during the Objection Period. Again, this letter is intended as support for the Section 16 Project to move forward, however, AFRC still believes some of our suggested changes could be considered and incorporated during implementation.

Sincerely,

Tom Partin
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