Via: https://www.fs.usda.gov/project/boise/?project=67425

March 17, 2025

Brant Petersen, Forest Supervisor
Attn: Brian Lawatch
1249 S Vinnell Way Ste 200
Boise, ID 83709

Re: Lava Restoration Project Scoping Comments

Dear Mr. Petersen:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Lava Restoration Project (Lava) on the Boise National Forest in Idaho. AFRC both appreciates, and is very pleased, to see the District utilizing Emergency Situation Determination authorities for this project. The Lava Project is located on the west side of the Emmett Ranger District, south of Cascade and north of the community of Ola, in Gem and Valley counties. The project area encompasses approximately 39,340 and all proposed actions will occur on National Forest System 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 Boise National Forest and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Idaho forest sector employs many Idahoans with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

Our members depend on a predictable and economical supply of timber products off Forest Service lands to run their businesses and to provide useful wood products to the American public.

The purpose of the Lava Restoration Project is to address and mitigate the impacts to the landscape from the 2024 Lava Fire and the specific needs include: hazard tree mitigation, commercial salvage, reforestation, range management, re-vegetation of non-forested areas, infrastructure repair, and recreation and access management. AFRC fully supports the purpose and need for Lava.

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. Placing restrictions on the specific machinery to be used severely impacts the economic viability of the timber sale while not improving the end result. Descriptions should be limited to "ground based" or "skyline/tether" with a description of the objectives and outcomes desired. Locking in the specific type of logging system, such as "cut-to-length" equipment, in the NEPA document removes flexibility during the implementation stage.

Standard utilization specifications used on green Forest Service timber sales will not likely be appropriate for the salvage sales generated from this project. Due to the damaged nature of the timber products being proposed for harvest, there will be an unusually high level of uncertainty by the Forest Service and prospective purchasers of the actual value of those products on the stump prior to harvest. This uncertainty is exacerbated by the fact that additional time for wood deterioration will elapse between the time of purchase and the time of harvest. Therefore, the Forest Service should be ***developing minimum removal requirements and utilization specifications that align with this uncertainly.*** Purchasers will recover as much value from these damaged products as possible. Required them to recover value that is not available will reduce the likelihood that these sales will successfully sell.

The decline in the forest products infrastructure, both sawmilling and logging, in west central Idaho is of huge concern as is the fragile condition of the remaining infrastructure. Considering both the time of year and the intensity of the Lava Fire, combined with the remote location, AFRC recommends that a field trip to review the proposed commercial harvest take place as soon as the area is accessible. Any type of blue stain in the pine will dramatically devalue the lumber even though it remains structurally sound. Burned grand fir, especially at high heat intensities, is generally not desirable.

SCIENTIFC REVIEW

It is important that the Forest Service consider all available scientific literature related to both action and inaction following wildfire to enable the decision-maker the ability to assess the tradeoffs of a.) conducting timber salvage; and b.) not conducting timber salvage. We would like the Forest Service to review the literature cited below and incorporate its findings into the project record.

Hydrology

Cole RP, Bladon, KD, Wagenbrenner, JW, Coe Drew B.R. Hillslope sediment production after wildfire and post-fire forest management in northern California. *Hydrological Processes.* 2020;1-18

Key points/findings of the Cole paper include:

- Sediment yields two years following the fire event were highest in areas that did ***not*** include timber salvage.
- Sediment yields were lower on areas that were salvaged.
- Post-fire management resulted in lower rates of erosion and sediment delivery.

Niemeyer RJ, Bladon KD, Woodsmith, RD. Long-term hydrological recovery after wildfire and post-fire forest management in the interior Pacific Northwest. *Hydrological Processes.* 2020;1-16.

Key points/findings of the Niemeyer paper include:

- Spikes in streamflow and runoff recovered more quickly on timber salvaged areas than on areas not salvaged.
- Post fire land management strategies, including timber salvage, may have increased the rate of hydrologic recovery in the long term when compared to unmanaged areas.

Robichaud PR, Lewis SA, Brown RE, Bone ED, Brooks ES. Evaluating post-wildfire logging-slash cover treatment to reduce hillslope erosion after salvage logging using ground measurements and remote sensing. *Hydrological Processes.* 2020;1–15.

Key points/findings of the Robichaud paper include:

- Logging slash applied at a rate to achieve a mean ground cover >60% was found to be an effective treatment to reduce post-salvage runoff and soil erosion.

Reforestation

Sessions, J, Bettinger P, Buckman R, Newton M, Hamann J. Hastening the return of Burnt Creek forests following fire; the consequences of delay. *Journal of Forestry.* April/May 2004, pp 38-45.

Key points/findings of the Sessions paper include:

- Timber salvage can assist in the hastening of Burnt Creek mature conifer forests on burnt landscapes.
- Delays in effective timber salvage could destine much of the most intensely burned areas to cycles of shrubs, hardwoods, and recurring fires for many decades.

Hazardous Fuels

Peterson, David W, Dodson, Erich K, Harrod, Richy J. Post-fire logging reduces surface woody fuels up to four decades following wildfire. *Forest Ecology and Management.* 338 (2015) 84-91.

Key points/findings of the Peterson paper include:

- Post fire logging can significantly reduce future surface woody fuel levels in forests regenerating following wildfires.

Thank you for the opportunity to provide comments on the Lava project and I will be in contact with you soon regarding a simple industry field trip to review and provide feedback on the viability of the proposed commercial harvest.

Sincerely,

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