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

March 21, 2025

Reviewing Officer
Northern Regional Office
Attn: Lacy Lemoosh
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 supportive comments for the Lacy Lamoosh Project which is currently in the Objection Period.

AFRC is a regional trade association whose purpose is to advocate for sustained timber yield 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 proposed Lacy Lamoosh project area is approximately 16,116 acres in size, located in the southwest portion of the St. Joe Ranger District in Benewah and Latah Counties, Idaho. The southern border of the Project is adjacent to the Nez Perce-Clearwater National Forest and coordination has taken place to ensure the proposed action is consistent with shared resource objectives. AFRC and our members are very familiar with the project area and have travelled through the area and examined some of the timber stands. In addition, AFRC provided scoping comments on May 9, 2023, and Draft EA comments on September 17, 2024.

AFRC is not writing to object to this Project, rather we are submitting this letter to encourage the Forest to move quickly to Project implementation. However, we do have suggestions below as to

how some of the implementation features of the Project could be improved. While we noted in our Draft EA comments that the scope of the Project was reduced in size, AFRC believes the actions outlined in the Final Decision are timely and need to be implemented.

Why is AFRC Supporting the Project?

1. **The 3,729 acres of forest management activities need to be implemented to reduce fuel loading and improve forest health**. Although we are disappointed that the proposed commercial treatment acres were reduced from the 5,400 acres originally proposed in scoping, those 3,729 acres remain in need of treatment. These treatments and the timber products they generate are very important for the timber industry and the communities where they are located. Idaho's forest products industry is one of the largest components of manufacturing in the state. There are several sawmills, post and pole, and smaller wood operations in the Project's vicinity. 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. Studies in Idaho show that for every million board feet harvested 18-20 direct and indirect jobs are created.

2. **Even-aged harvests are needed.** AFRC supports the even-aged regeneration harvests proposed in areas where forest health issues are prevalent. This is particularly pertinent in root rot areas. 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. Less than 20 percent of the project area is occupied by shade-intolerant species dominance groups. This represents a severe lack of shade-intolerant dominance groups within the project area. Trending the forest composition towards the desired ranges outlined in the forest plan would increase resistance and resiliency, reducing the effects from drought, fire, insects, disease, and climate change. 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. Due to the declining forest health and existing fire hazards in the project area, there are 22 proposed openings greater than 40 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's scoping letter and a 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.

3. **Some flexibility was needed/given in logging plan.** While we are pleased to see that some tethered logging acres have been added from scoping to the Final Decision, we ask the District for more flexibility. 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 soil 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.

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Table 2. Proposed Logging Systems*.

Logging System	Scoping Acres	EA Acres
Ground Based	1,275	929
Off-Road Skyline Yarder	1,275	544
Skyline	1,850	1,157
Tethered	0	13

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 make surviving in the logging business much more difficult.

All of these issues listed above can be included in timber sale contracts to make them more workable.

4. **Carbon and Greenhouse Gas Information was updated and adequate.** AFRC presented research and literature on carbon and greenhouse gases in our scoping letter. We are pleased to see in the Final Decision and supporting specialist report on carbon and greenhouse gas effects that some of our material is referenced. We are encouraged that the information provided in the tables below shows the time it takes to recover emitted carbon from this Project is .9 months and for the Forest overall looking at all management projects it will take 9.3 months. We believe this is a good approach to analyzing this element of the Project.

Table 2. Estimates of carbon transfers and maximum substitution potential based on analysis using the Entity Guidelines tool.

	Alternative 1 No Action	Alternative 2 Proposed Action	Other planned harvests
	All in tonnes CO_2eq		
Project-level biogenic carbon transfers			
Total harvest transfer	0	275,649	3,088,446
Carbon storage, HWP in use/in landfill, year 100	0	-89,378	-1,070,173
Cumulative net harvest emissions, project timeline	0	186,270	2,018,273
Maximum substitution potential			
Products	0	-149,707	-1,792,515
Bioenergy (fuelwood)	0	-6,366	-76,218
Total	0	-156,072	-1,868,733

Based on the simplified assumption that all harvests occur simultaneously and using the estimated rate of net forest carbon uptake from the carbon dashboard, the IPNF would sequester the amount of carbon emitted by the harvesting alternative within 0.9 months (Table 3). Proposed harvests remove less than 0.06 percent of aboveground IPNF carbon, and less than 0.02 percent of total IPNF carbon (Table 3).

Table 3. Calculations to contextualize the impacts of harvest actions on unit-level carbon stocks. Time to recover emitted carbon makes the simplifying assumption that all harvests occur simultaneously.

Metric	Units	Alternative 1 No Action	Alternative 2 Proposed Action	Other planned harvests
Time until net growth recovers emitted carbon	Months	0	0.9	9.3

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5. **AFRC supports proposed road plan with exceptions.** Road decommissioning is proposed for about 25 miles in the project area; 4 miles are proposed decommissioning from existing system roads; and 21 miles are proposed decommissioning from non-system roads. Given the excess roading, and poor location of some of the existing roads, AFRC supports this plan. However, we have preferences as to how these closures should be implemented.

   In reviewing your final roads package, you need to consider 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.

   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.

   Please consider the above factors when making the final decision on where and how roads will be decommissioned.

6. **Project is economically feasible-available funds for restoration work.** AFRC believes the District completed a quality economic analysis on the Project showing that revenue is positive.

Table 2. Project Feasibility and Financial Efficiency Summary (2019 dollars)

Category	Measure	Proposed Action
Timber Harvest Information	Acres Harvested	2,643
Timber Harvest Information	Sawtimber Volume Harvested (CCF)	122,971
Timber Harvest Information	Base Rates ($/CCF)	17.00
Timber Harvest Information	Appraised Stumpage Rate ($/CCF)	44.00
Timber Harvest Information	Predicted High Bid ($/CCF)	50.00
Timber Harvest Information	Total Revenue (Thousands of $)	6,159
Timber Harvest & Required Design Features	Present net value ($Thousands)	1,681
Timber Harvest & All Other Planned Non-Timber Activities	Present net value ($Thousands)	797

With the timber generating over $6 million in revenues, this should allow enough money for needed K-V projects such as commercial thinnings and planting fire-resistant trees such as white pine, western larch, and ponderosa pine.

Thank you for accepting our letter of support for the Lacy Lamoosh Project. We look forward to its rapid implementation.

Sincerely,

Tom Partin
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