VIA Link: http://www.fs.usda.gov/project/?project=67684

April 6, 2025

Christopher Noyes
Acting District Ranger
Sandpoint Ranger District
1602 Ontario Street,
Sandpoint, Idaho 83864

Dear Christopher:

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

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 Sandpoint South project area is located in Bonner and Kootenai Counties, Idaho on the Sandpoint Ranger District of the Idaho Panhandle National Forests (IPNF). The project area encompasses 174,347 acres of IPNF, Bureau of Land Management, State Idaho Department of Lands, and private lands west of Lake Pend Oreille and south of the Pend Oreille River. The IPNF is proposing hazardous fuels reduction and vegetation management on approximately 8,334 acres within the 174,347-acre project area. Proposed treatments would only occur on lands managed by IPNF.

The Bonner County Wildfire Protection Plan (WPP) indicates the majority of communities in

Bonner County are at high risk of wildfire. The terrain and fuel conditions that exist across the county dictate that the majority of Bonner County is designated as a priority area in the WPP. The Sandpoint South Project proposes hazardous fuels/vegetation management activities in the vicinity of these communities and values at risk. Compounding the problem is the fact that a landscape-level disturbance such as unsuppressed wildfire has not occurred across the majority of the project area for over 100 years. Contiguous patches of stands throughout the project area are shifting from fire-adapted early seral species to shade-loving, fire-intolerant late seral species thus providing a tinderbox of fuels ripe for wildfire.

AFRC supports the Project, and the Purpose and Need for implementation which includes:

- Decrease wildfire impacts on resource values and private land through hazardous fuels reduction activities on public lands.
- Maintain and improve forest resiliency by managing composition and structures that better resists insects and disease and more closely mimic historic landscapes.
- Improve road and culvert conditions to decrease sediment delivery and maintain or improve water quality.

While AFRC supports the Purpose and Need for the Project, we offer the following comments that we hope will supplement and improve the Project planning.

1. Our members depend on a predictable and economical supply of timber products off 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 Sandpoint South 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 off this Project is paramount. We would like the Forest Service to recognize this importance by **adding economic viability & support to the local infrastructure to the purpose and need** of the Sandpoint South Project. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective of any project proposed on Forest Service land. As the Forest Service surely knows, the "restoration" treatments that are desired on these public lands cannot be implemented without a heathy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed.

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. AFRC supports the proposed vegetation treatments listed below in Table 3.

Table 3. Summary of the Proposed Vegetation Treatments

Proposed Vegetation Treatments	Units	Acres
Natural Fuels Burning	22	1,541
Fuels Only	27	1,580
Fuel Break	10	399
Pre-Commercial Thin	15	528
Regeneration Harvest	106	3,419
Intermediate Harvest	27	866
Total Units/Treatment Acres	**207**	**8,334**

While we support the treatment regime we would like to comment on a few specific actions.

- First, we think it's imperative to locate fuel breaks adjacent to private ownerships, powerline corridors and other values. AFRC believes these fuel breaks should be 300 ft wide and thinned down to a residual 40 sq. ft. of basal area.
- Commercial thinning is being proposed to reduce ladder fuels while improving forest growth and resilience by reducing overall stand density and improving species composition and structure. Leave tree selection would favor early seral and fire-tolerant species, including ponderosa pine, western larch, western white pine, and Douglas-fir on most sites. Again, AFRC suggests thinning these stands down to a residual 40 sq. ft. of basal area. This will reduce fuel loading while improving tree vigor on the residual trees.
- AFRC applauds the inclusion of regeneration harvest treatments such as shelterwood, seed tree, and clearcut. Regeneration harvest is an integral component of the Forest's sustainable vegetation management program. The intention is to establish new stands of long-living, early seral, shade-intolerant, drought- and fire-tolerant, insect/disease resistant species such as ponderosa pine and Douglas-fir. Table 2 below points out the shortage of the ponderosa pine and Douglas-fir dominance group across the project area today.

Table 2. Existing and desired future conditions for forest dominance groups in the biophysical settings of the project area

Biophysical Setting	Forest Cover Type	Acres	Existing Proportion of project area (percent)	Dominance group	Desired Proportion (percent)
Warm/Dry	Ponderosa Pine	2202	9.0	Ponderosa Pine	32-65
	Douglas-fir	4774	19.5	Douglas-fir	25-55

- AFRC recognizes that using shelterwood, seed trees, and clearcut silvicultural treatments across wide areas to establish more fire-resistant species would create openings which exceed 40 acres. These treatments are in response to deteriorating forest health conditions, hazardous fuel loading within the project area, and would contribute to reaching the desired conditions and objectives identified in the Forest Plan. The most common and destructive forest diseases observed were root disease and dwarf mistletoe. Root diseases observed included Armillaria, laminated root disease, Heterobasidion, and Schweinitzii root and butt rot. Douglas-fir and western larch dwarf mistletoe is present throughout the project area both in mature trees and in regeneration, which poses a threat to future stand health and longevity. AFRC supports creating 22 openings ranging from 46-352 acres total.

3. While AFRC supports the proposed vegetation management plan, we would like to suggest that many of the landlocked Forest Service parcels be considered for inclusion in this Project to be treated using GNA. Gaining access to these parcels with easements is often problematic for the Forest Service.. These access issues may be mitigated by leveraging IDL through GNA. It appears that the District is bypassing several thousand acres by not pursuing this option.

4. AFRC is pleased to see the District address timber harvest treatments and the types of equipment to be used: *"Harvested trees can be removed with various logging systems, including ground-based skidding, skyline cable yarding, skyline swing with tractor, tethered equipment, and log forwarders. The trees that are cut as part of the harvest treatments would be removed from the units by either tree yarding or cable yarding methods. The tree yarding method, called ground-based, involves using logging equipment such as skidders, mechanized harvesters, tethered machinery or a combination of those types of equipment. Cable yarding methods would be used on steeper topography where a crane-like machine known as a yarder, would operate from a road and would pull the partially suspended logs up the hill using cables. Some proposed units or portions of units may change from ground-based to cable yarding methods during unit layout based on a more detailed review of the site condition and topography."*

This description fits well with our suggestions that operations be written into NEPA documents to allow for flexibility. There are many ways to design a timber sale that enables a purchaser 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 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 District 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.

Tethered-assist equipment is also becoming a more viable, safe, and available option for felling and yarding on steep slopes. This equipment has shown to contribute negligible ground disturbance when compared to traditional cable systems. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. Other Forests in the Region have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. We would like the District to permit this as well. It would be helpful if you would prepare your analysis documents in a manner that will facilitate this type of equipment. The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. **We urge the Sandpoint District to consider allowing this equipment to be used where appropriate mitigate implementation obstacles.**

Green, P. Q., Chung, W., Leshchinsky, B., Belart, F., Sessions, J., Fitzgerald, S. A., Wimer, J. A., Cushing, T., Garland, J. J. (2019). Insight into the productivity, cost and soil impacts of cable-assisted harvester forwarder thinning in western Oregon. *For. Sci.* 66(1):82–96

Key Point of the Green paper include:

- The use of cable assistance can reduce track coverage and reduce shear displacement, and thus likely lessen potential soil impact caused by forestry machines.

Garland, J., F. Belart, R. Crawford, W. Chung, T. Cushing, S. Fitzgerald, P. Green, *et al.* 2019. Safety in steep slope logging operations. *J. Agromedicine* 24(2):138–145.

Key Point of the Garland paper include:

- Use of new tethered-assist technology reduces exposure to hazards and reduces workers exposed to the most dangerous work in logging—felling and working on cable operations on steep slopes.

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

5. AFRC supports fuels reduction activities in segments of the Blacktail Mountain Backcountry. Approximately 226 acres, three percent of the total project, are fuels reduction treatment activities in the Blacktail Mountain Backcountry that borders private ownership. These fuels reduction treatments along the boundary of private landownership to mitigate fire and insect and disease risks is critical.

6. AFRC encourages the Forest to conduct a detailed analysis on the Project's impact to climate change, carbon sequestration, and greenhouse gas emissions. We strongly believe that the minor, short-term emissions associated with timber harvest and other associated treatments are dwarfed by the long-term benefits associated with such treatments.

We urge the District to clearly outline how the proposed treatments, while possibly emitting carbon in the near term, would ultimately benefit climate change mitigation goals by 1.) reducing the likelihood of carbon emissions through wildfire; 2.) increasing the rate of carbon sequestration by reducing competition to residual trees; and 3.) storing carbon in long lasting wood products that would otherwise be at risk of loss through wildfire. Carbon loss through high intensity wildfire has become a leading cause of our national forests transitioning from carbon sinks to carbon sources. Active management to reduce such a transition would not only reduce carbon loss but accelerate carbon sequestration. And ultimately, any timber products harvested to further these two objectives have been shown to have long lasting carbon storage potential.

Please consider 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.

There is scientific support for the practice of regular harvests at an age where tree growth begins to slow, storage of that tree carbon in long-lasting wood products, and proactive reforestation. A failure to do so would hamper that acre's ability to maximize carbon sequestration through the replacement of slow growing large trees with fast growing small trees and the storage of those large trees in long-lasting wood products. Not storing that carbon in wood products also poses the risk of losing the carbon in standing trees from high intensity wildfire, which is becoming increasingly prevalent on public lands in western states. A 2022 study estimated that wildfires in California in 2020 emitted 127 million metric tons of carbon into the atmosphere, making the greenhouse gas (GHG) emissions from wildfires the second most important source in the state, after transportation. For context, the U.S. Forest Service recently disclosed that the agency only "commercially harvests one tenth of one percent of acres within the National Forest System each year. Harvests are designed to improve stand health and resilience by reducing forest density or removing trees damaged by insects or disease that make up 86 percent of those acres. The remainder are final regeneration harvests that are designed to be followed by reforestation. There is an extraordinary opportunity to increase the practice of sustainable forest management on federal lands as an effective tool to sequester carbon.

Harvesting trees and transferring the stored carbon to wood products allows a land manager to "stack" the sequestration potential of that land. For example, assume an objective to maximize carbon sequestration on 100 acres over a 150-year period starting at year zero. Without active management and timber harvest, those trees would grow to 150 years and represent the only carbon sequestered on those 100 acres at the end of the 150-year cycle (assuming they don't burn

in a wildfire). Alternatively, the trees could be harvested on a 50-year rotation and stored in wood products. After 150 years, there would be carbon stored in an existing 50-year-old stand, plus carbon stored in wood products from an additional two 50-year-old stands previously harvested. The figure below from the IPCC (2007) illustrates the concept of stacking. **Please consider adopting this graph into the Sandpoint South Project analysis.**

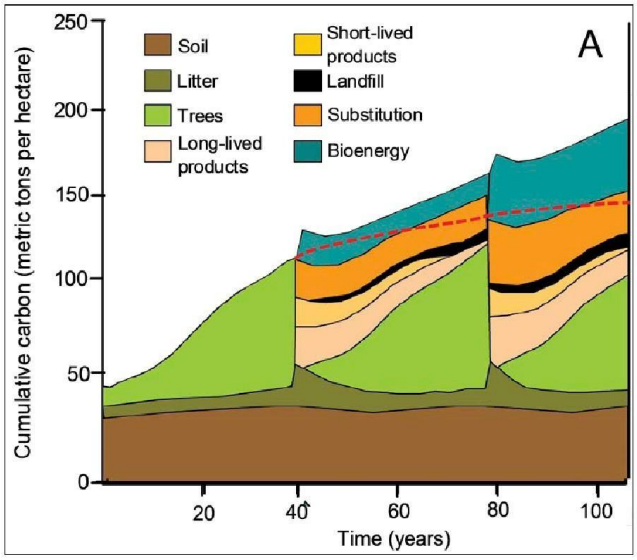

Figure 8.7—Carbon balance from a hypothetical forest management project in which the forest is harvested roughly every 40 years from land that started with low forest carbon stocks. This figure accounts for forest regrowth and carbon stored in wood products in use and landfills as well as the prevented 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. A 2013 study from the Journal of Sustainable Forestry summarized these concepts well: *More CO2 can be sequestered synergistically in the products or wood energy and landscape together than in the unharvested landscape. Harvesting sustainably at an optimum stand age will sequester more carbon in the combined products, wood energy, and forest than harvesting sustainably at other ages*.

We would like to encourage the IPNF to consider several additional 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.

U.S. Department of Agriculture, Forest Service. 2023. Future of America's Forest and Rangelands: Forest Service 2020 Resources Planning Act Assessment. Gen. Tech. Rep. WO-102. Washington, DC. 348 p. https://doi.org/10.2737/WO-GTR-102.

To further support the concepts validated by Gray et al., the USDA recently published a Technical Report on the future of America's forests and rangelands.

Key points of the Report include:

- The projected decrease in young forests and increase in older forests will result in overall decreases in growth rates and carbon sequestration.
- The amount of carbon sequestered by forests is projected to decline between 2020 and 2070 under all scenarios, with the forest ecosystem projected to be a net source of carbon in 2070.
- Without active management, significant disturbance, and land use change, forests approach a steady state in terms of C stock change over time.
- Annual carbon sequestration is projected to decrease, indicating carbon saturation of U.S. forests, due in part to forest aging and senescence.

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.

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.

In addition to this study, a recent report by the Forest Service titled: USDA: Forests Converting to Carbon Emitters finds American forests may convert from being carbon absorbers to significant carbon emitters. Researchers say the shift is due to the increasing destruction from natural disasters and the aging of forests, which is reducing their carbon absorbing capabilities.

Our forests currently absorb 11 percent of U.S carbon emissions, or 150 million metric tons of carbon a year, equivalent to the combined emissions from 40 coal power plants. However, starting in 2025, their ability to hold carbon may start plummeting and could emit up to 100 million metric tons of carbon a year as their emissions from decaying trees exceed their carbon absorption.

7. AFRC suggests that Forest Service consider using an Emergency Action Determination to expedite implementation of the Project The condition of the fuels and the private land interface on the project area may warrant an emergency determination.

Thank you for the opportunity to provide scoping comments on the Sandpoint South Project. We look forward to commenting on the Draft EA when it becomes available.

Sincerely,

Tom Partin
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