

Data Submitted (UTC 11): 4/20/2020 7:00:00 AM

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Comments: Please accept the attached comments on behalf of Idaho Forest Group.

ATTACHMENT BELOW

April 20, 2020

Zach Peterson

Forest Planner

Nez Perce-Clearwater National Forests Supervisors Office

903 3rd Street

Kamiah, Idaho 83536

Dear Mr. Peterson:

Idaho Forest Group (IFG) would like to thank the Nez Perce - Clearwater National Forests (NPCWNF) staff and leadership for their professionalism and diligence in the development of the revised Forest Plan and DEIS. Please accept the following comments on behalf of IFG.

IFG has participated in the Clearwater Basin Collaborative since its inception in 2008. We are very proud of the many accomplishments of the CBC over the years, not the least of which is a solid partnership with the NPCWNF on many of the member organization's primary goals and interests including the increased scale and pace of vegetation management. IFG fully supported the development and results of both the Phase I and II (2014) Landscape Assessment documents that have helped characterize the need for both active and passive forest restoration efforts to address departure from natural range of variation by forest type on the NPCWNF specifically. We also fully support the early results of the elk nutrition study led by the CBC and other partners that highlights the importance of high quality habitat for ungulates and other wildlife.

IFG credits the CBC with helping the NPCWNF be a leader both regionally and nationally in the use of new tools such as the Good Neighbor Authority and various other authorities made available through the Farm Bill, increasing NEPA efficiency with larger scale projects, the Collaborative Forests Landscape Restoration Program, and Shared Stewardship opportunities. With the support of the CBC, the NPCWNF has tripled its annual timber sold volume since 2008, from about 35 MMBF to a current target of 100+ MMBF a year, resulting in a +.77% increase in overall growth on the Clearwater and slowing mortality based on an independent study by IFG in 2018. This is a noticeably more positive trend than neighboring Forests.

SEE ATTACHMENT FOR FIGURE

Figure: Net Growth as % of BF Volume on Timberland, by National Forest (Idaho)

While the CBC still has much work to do in order to meet the full intent of its 2013 Agreement and Work Plan, IFG does recognize the vast improvement in science-based vegetation management on the Forests and still believes that the CBC is the best vehicle to achieve the level of restoration for all interests described in the Agreement and Work Plan.

IFG considers all of the resource components described in the revised Forest Plan important, but our comments are generally specific to those components that we feel we have a stated interest, expertise, or information that will lead to improved understanding of the intent.

1. Forestlands:

IFG strongly supports moving species composition, size and age classes, and stand structural components towards desired conditions in all potential vegetation groups.

we support FW-DC-FOR06 in particular because the Warm Moist PVT group is the most departed from natural range of variation with an overabundance of grand fir, western red cedar, and Douglas-fir and is underrepresented by ponderosa pine, western larch, and western white pine as shown in Table 5. This departure presents the highest risk to forest resilience, health, and wildlife habitat loss to a large portion (47%) of MA3.

we support MA3-DC-FOR-12 recognizing that timber harvest plays an important role in accomplishing desired conditions. We generally support Alternative Y for determining acres treated with harvest by potential vegetation group with extra emphasis on the warm moist and warm dry groups as offering the best opportunity to reduce fire risk, improve resilience, and improve wildlife habitat.

we support MA3-GDL-FOR-06 for alternatives W, X, and Y for recruitment of snags and oppose Alternative Z.

we support the MA3-GDL -FOR-05 minimum snag guidelines for Alternatives W, X, and Y as shown in Table 12 and oppose Alternative Z guidelines as shown in Table 13. The Alternative Z guidelines are likely to impair silviculture goals and increase safety hazards during harvest operations.

2. Fire Management: IFG supports a comprehensive fire management program on the NPCWNF, including active fire suppression in MA-3, prescribed fire for ecosystem/wildlife objectives in MA- 2&3, and managed wildfire in MA-1&2. We encourage the NPCWNF to continually identify opportunities and remove barriers in order to prioritize achievement of the goals, desired conditions, and objectives shown on pages 40-42 of the Draft Revised Forest Plan.

We support FW-DC-FIRE-03 that recognizes wildland fire at smaller scales and lesser severities is preferable in areas where resource objectives and infrastructure make this the least desirable management tool. However, this desired condition could be more clearly written to state that wildland fire will be actively suppressed in MA3 in order to protect other resource components and desired conditions for this Management Area.

IFG supports the continued partnership between the NPCWNF and entities like the Clearwater-Potlatch Timber Protection Association (CPTPA) for implementing prescribed burn prescriptions. The CPTPA and entities like them specialize in both wildland and managed fire and can be of assistance in obtaining desired conditions while maintaining the highest level of safety.

3. Soils: IFG strongly supports the desired conditions to maintain productive and functional soils across the Forests.

Specific to MAD-GDL-SOIL-01, but applicable across other Plan components as well, allow flexibility for improved harvest techniques/technology and equipment innovations (e.g. ground-based tethered logging on steeper slopes) that will ultimately maintain soil function, improve efficiency, and increase safety of operators .

4. Water Resources:

In the January meeting of the CBC with the Forest Planning team, several aspects of the Aquatic and Riparian Conservation Strategy, which is embedded within multiple resource components consistently throughout all Alternatives. We support the Forests' efforts to consult with a multi-agency charter group on the development of the Strategy.

It was noted during the CBC meetings that in Table 1 of Appendix 4: Management Approaches and Possible Actions, the language describing the thresholds for various stream condition indicators included phrases such as "unacceptable risk", which automatically, and we feel unintentionally, creates a condition requiring a response. It is our understanding that the table is meant to help identify areas of concern or "red flags" for further review and does not make a determination of acceptable or unacceptable risk. We would suggest changing the language to reflect the intended purpose of the Stream Conditions Indicator Assessment.

It was also noted during the CBC meeting that for these elements of the Plan in particular, it would be beneficial to run "Plan to Project" scenarios to ensure the multi-scale analysis approach accomplishes desired conditions as intended and in an efficient and repeatable manner.

We generally support emphasizing restoration activities in priority and Conservation Watershed Network watersheds including decommissioning of non-system roads; however, we would suggest adding language that specifies that these activities would mostly be accomplished as part of an integrated restoration project including vegetation and other treatments to minimize multiple entries and soil disturbance.

5. Infrastructure: IFG generally supports the desired conditions and guidelines for maintenance of infrastructure, particularly roads, across the Forests. However, we feel that the management of road systems in particular should be based on functionality and need while minimizing the actual miles of road to the extent possible to protect fish and wildlife as well as reduce ongoing maintenance costs. It is also important that the road system be designed and serviced appropriately to reduce erosion, degradation, and other negative impacts, which means that some older roads and templates may need to be relocated, removed, or placed into long-term storage.

While we understand the need for minimum annual targets for maintenance and overall improvement of the infrastructure, establishing objectives with somewhat arbitrary targets does not seem like a long-term management plan based on need or other ecologically-driven purposes. We would prefer to see more flexibility in the stated objectives that were specifically tied to the restoration need, level and location of annual timber harvest and other vegetation management treatments, and maintaining or improving sustainable public access and recreation opportunities while also allowing for a quick response to weather events that will undoubtedly require maintenance of the infrastructure on an annual basis.

IFG would request that the NPCWNF consider paving certain high traffic routes on the Forests to help minimize chronic erosion and maintenance costs as well as reduce continuous dust abatement and other short-term solutions to ongoing problems. This will require careful consideration and analysis of effects to other resource components, but examples of potential candidate roads would be the North Fork Road 250 on the Idaho side below Cedars Campground, Kelly Creek, Deception Pass, Trout Creek and the Little Joe (Montana side), and the 255 Road that parallels Kelly Creek up to Moose Creek and eventually ties into the 250 Road. All of these routes receive heavy recreational traffic and intermittent truck traffic from harvest operations.

6. Timber Management: IFG supports a vegetation management program that leads to a healthy and resilient forest ecosystem while providing for a sustainable timber output in perpetuity. These goals as well as incorporating the objectives of recreation, wildlife habitat, healthy aquatic habitats, social and economic stability of local communities and others are NOT mutually exclusive. We support the Forests use of natural range of variation as a guide in determining best management principles although it should be noted that the departure of the Forests from NRV will change over time with project accomplishments and natural disturbance. Therefore, the "target" is as dynamic as the forest ecosystem itself.

The desired conditions, objectives, standards, and guidelines described in Section 5.1 Timber are thoughtful and reflect many of the concerns raised by IFG and others throughout the forest planning process. Specifically,

we support FW-DC-TBR -03 in areas suitable for timber harvest.

we support FW-DC-TBR-06 demonstrating the Forests commitment to limit loss of timber value due to wildland fire on lands suitable for timber production.

we support FW-STD-TBR-05 to increase the maximum opening size to 375 acres to better emulate natural disturbance patterns and increase economic efficiency and FW-STD-TBR-07 recognizing that the 375 acre maximum opening size does not apply to salvage harvest openings created as a result of stand replacing or stand initiating natural disturbances .

we support FW-STD-TBR-11 recognizing that salvage and/or sanitation harvest is a response to a natural event that should not be counted towards the sustained yield limit

we support FW-GDL-TBR-04 recognizing that stands meeting desired conditions should generally be harvested at or near culmination of mean annual increment and describing scenarios where there are exceptions such as to reduce fuel loading.

IFG generally supports the level of harvest and timeline reflected by Alternative Y with the Projected Timber Sale Quantity of 150 MMBF in MA3 (188-189 MMBF total including harvest on unsuitable acres) consistently for the first two decades (not including salvage) as described in the DEIS. We understand the PTSQ/PWSQ by definition is not a target and will fluctuate over time to support the Forests' fiscal capability and organizational capacity up to the final sustained yield limit as appropriate to meet the desired conditions. For Timber, we feel this alternative provides the most reliable timber supply, supports economic stability, and gets as close as possible to a science-based vegetation management program over the long-term that trends towards natural range of variation in MA3.

The goal of reaching desired conditions over a 50 year timeline seems like an appropriate scale to allow for the development of the industry and related services as well as the adaptability of the local economy and communities. It also provides some security for additional investments in local infrastructure without facing a drop off in later years.

Increased active management of the Forests represents perhaps the largest economic growth opportunity for rural counties within the impact area. The overall social benefits to the community and multiplier effect this increase will have on the Forests' ability to complete other important restoration and service activities like recreation management should not be under analyzed. According to the University of Idaho 's Policy Analysis Group, every thousand board feet of timber harvested in Idaho provides 22 jobs (12 direct and 10 indirect).

The Plan states that MA2, which consists of Idaho Roadless Areas and Recommended Wilderness Areas, will be managed with an emphasis on ecological restoration. We support this direction as the areas in MA2 will be crucial in the effort to improve elk habitat and other wildlife habitat across the Forests. The Forests should use all tools available to them, including responsible timber harvest and prescribed burns, as allowed under the Idaho Roadless Rule, to achieve these goals. Current vegetation management in Idaho Roadless Areas is concentrated around human settlement in WUis and CPZs. We encourage the Forests to plan projects outside of this narrow focus.

7. Wild and Scenic Rivers: In March 2018, the CBC submitted a document to the Forest Supervisor outlining the outcome of multiple discussions among the membership on the eligibility of specific rivers for designation. While no consensus decision was reached for a recommendation of suitability for designation due to concerns over whether the Wild and Scenic Designation was the appropriate mechanism to protect these watersheds, there were 13 rivers that most members thought at least met the criteria for eligibility. While the risk seems extremely low, IFG would oppose any proposals to dam any of the 13 free flowing rivers named in the CBC letter. That said, the concerns raised by the CBC over the potential consequences or perhaps unintended consequences of the

Wild and Scenic designation are not adequately addressed in the Forest Plan and may require a more creative solution than the alternatives offered.

8. Recommended Wilderness: The CBC's 2013 Agreement and Work Plan identified 5 areas that members felt best represented wilderness values and also had the highest likelihood of political and social success for a wilderness designation. They were the Great Burn/Hoodoo IRA, Sneakfoot Meadows, North Fork Spruce - White Sands, Mallard-Larkins IRA, and East Meadow Creek IRA. IFG would support these areas as the maximum designation if a workable compromise for appropriate boundaries, motorized recreation, wildlife management, and non-conforming exceptions for administrative maintenance, public access, and weed management was found. These concerns along with boundary adjustments and additions / deletions should be part of continuing conversations, and ultimately confirmed within a broader legislative package that represents the compromise and consensus among interested stakeholders.

9. Social and Economic Concerns: The social and economic well-being of the counties and communities within the area of impact are linked directly to decisions made by the NPCWNF because of the large percentage of National Forest System acres as well as the high percentage of people working in natural resource sectors related to the Forests' management. While we feel the Forests have recognized this relationship more so in recent years, the social and economic prosperity of these communities should be a goal with its own desired conditions and considered as a standalone plan component rather than distributed among the "Human Uses of the Forest" with objectives that don't appear to measure social or economic sustainability. The draft Forest Plan does a reasonably good job analyzing the effects of other plan components on social and economic impacts although we would point out that the IMPLAN and Aphelia analyses/data within the DEIS are broad and vague relative to the economic condition and the model outputs portrayed in Table 3 and 4 on pages 3.8.1-11&12 of the DEIS do not seem to accurately portray the economic impacts between alternatives (they should not be constant). IFG would support an additional perspective where social and economic goals are considered first with impacts on other resources rather than as a by-product.

We fully appreciate the level of effort that went into the development of the revised NPCW Forests Plan and DEIS as well as the work yet to come as the Forests consider comments and ultimately make a final decision. IFG would welcome the opportunity to participate in further discussions or answer any questions related to our comments or other issues that would assist the Forest Supervisor and Forest Plan Team along the way. Thank you for your time and consideration of our comments.

Sincerely,

/s/

Tom Schultz, VP Resources and Government Affairs
[bull] St. Regis