



April 4, 2016

Keith Lannom, Forest Supervisor
Payette National Forest
500 N. Mission Street
Building 2
McCall, ID 83638

VIA EMAIL: comments-intermtn-payette@fs.fed.us

RE: Middle Fork Weiser River Landscape Restoration Project Draft Environmental Impact Statement

Dear Keith:

Thank you for the opportunity to comment on the proposed Middle Fork Weiser River Landscape Restoration Project (MFWR) Draft Environmental Impact Statement (DEIS). The MFWR project is located in the Weiser River drainage approximately 6 miles southeast of Council, Idaho and is a very important and popular area to the citizens of Adams County 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 and 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 Payette 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.

AFRC has the following comments concerning the MFWR project as proposed.

First we strongly support Alternative 4. Compared to the proposed action, Alternative 4 proposes additional treatments in potential vegetation groups (PVGs) 7 – 11. These vegetation groups are critically in need of treatment and recent science that strongly supports and advocates management in these higher elevation forests. Please refer to the recent publication PNW-GTR-897, *The Ecology and Management of Moist Mixed-Conifer Forests in Eastern Oregon and Washington: a Synthesis of the Relevant Biophysical Science and Implications for Future*

Irene Jerome
AFRC Consultant
408 SE Hillcrest Road
John Day, OR 97845

Land Management. Unfortunately, the Forest Service has tended to avoid treatment in these areas in the past despite supportive science. The MFWR project area has some whitebark pine in PVG-11 and Alternative 4 provides treatments that would help sustain and enhance that important species. As a result of additional treatment of PVGs 7-11, Alternative 4 provides the most work toward maintaining and promoting large tree size classes across the landscape- an important part of moving the Forest toward the desired condition.

AFRC, in conjunction with the Payette Forest Coalition, attended a field trip to the MFWR project planning area in November 6 of 2015. One of the discussion stops was in an area that is designated as lynx habitat. However, according to the Forest Service wildlife biologist, the area is not suitable for lynx due to a lack of food appropriate food sources and at best would be habitat for secondary populations of lynx. Game cameras in the area for several years have not identified any lynx passing through the area. Please consider a site specific non-significant forest plan amendment to allow for creating more than 30 percent unsuitable Canada lynx habitat within the MFWR Lynx Analysis Unit only. Given that over half of the Payette National Forest is not available for general forest management – but is still vulnerable to catastrophic wildfire – this is critical for local economies, recreation, and forest health and resilience.

Elk security and protection requests and requirements are becoming problematic in this area. Current elk numbers in the project area exceed population goals. This issue is complicating forest treatments and road management issues. Adequate road systems are critical for safe public access, fire access, and contractor access. Thus the project should include a goal of reducing elk cover.

Alternative 4 also provides the opportunity to do appropriate treatments next to the Tamarack Ski Area and Resort and the heavily developed Cascade Lake west side. During the 2007 Grays Creek Fire the governor of Idaho declared a state of emergency to ensure these areas were protected and provides the resources to do that. Adams County is in the process of adding this area as Wildland Urban Interface (WUI) to their Community Wildfire Protection Plan.

Second, AFRC strongly supports working in riparian zones when scientifically appropriate.. Research provided by Charlie Luce strongly encourages treating right next to streams to enhance riparian areas. This type of work directly next to streams does the most to stabilize stream banks and accelerates vegetation sprouting after fire. Please ensure that you are utilizing the “best available science” when treating these RCAs. Some areas of the MFWR project have roads that are close to streams with the vegetation next to the roads away from the streams in desperate need of treatment of provide for firefighter safety and access. Alternative 4 provides for the most treatment of RCAs.

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In summary, the MFWR project as proposed under Alternative 4 provides a comprehensive plan for addressing and improving forest health, preserving and protecting valuable watersheds, recreational, and private properties as well as treating 17,140 acres to maintain or promote desired species and over 10,000 acres to promote and/or maintain large tree size classes. Subsequently Alternative 4 provides the most forest products that will be available for the local economy and the best mitigation for reducing uncharacteristic fire events in this area. We encourage you to select and implement Alternative 4 on the MFWR project.

Thank you for the opportunity to provide comments on the MFWR DEIS. I look forward to following the implementation of this project as it moves forward.

Sincerely,

A handwritten signature in cursive script that reads "Irene K. Jerome". The ink is dark and the signature is fluid.

Irene K. Jerome
AFRC Consultant
Eastern Oregon and SW Idaho