



Via: <https://cara.ecosystem-management.org/Public//CommentInput?Project=50218>

July 5, 2019

Keith Lannom, Forest Supervisor  
Payette National Forest  
500 North Mission St, Building 2  
McCall, Idaho 83638

Dear Keith:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Huckleberry Landscape Restoration Project (Huckleberry) draft environmental impact statement (DEIS). Huckleberry is located on the Council Ranger District of the Payette National Forest in Adams County, Idaho. The planning area encompasses approximately 67,000 acres with a large variety of resource treatments including 17,770 acres of commercial thinning. This area is a 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 Payette 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.

### **Purpose and Need**

AFRC supports the landscape scale and "all hands all lands approach" for management and supports forest plan amendments, treatments in aspen clones, riparian conservation areas (RCAs) and late and old structure stands. 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 treatments on the Huckleberry project 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 a statement to the purpose and need in to clearly articulate the importance of **supporting and maintaining to the forest products infrastructure**. Supporting and retaining local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service land, particularly those lands designated as Management Prescription Category (MPC) 5.2 (Commodity Production Emphasis in Forested Landscapes) as allocated and defined by the Payette Forest Land and Resource Management Plan (LRMP). The consideration of active management on every acre of appropriate land, regardless of its land allocation, is important to our membership as each year's timber sale program is a function of the treatment of aggregate forested stands across the landscape.

NEPA is a procedural statute. It requires only that environmental consequences of an action be analyzed and disclosed. A project designed to produce timber production is entirely consistent with NEPA. The purpose and need for Huckleberry is extremely long and comprehensive. While AFRC appreciates that this is a "landscape scale" project, is it realistic when viewed through the lens of accomplishments required to meet that purpose and need? A field trip to the Huckleberry planning area on August 17, 2018 revealed a rugged and remote landscape with limited access and heavy recreation use.

AFRC requests that the Payette intensively manage plantations in the Huckleberry project area to provide wood products for future generations. Current forest management practices on the Payette do not reflect requirements from the National Forest Management Act (NFMA). NFMA was enacted in response to court decisions that ongoing forest management was limited by the Organic Act. The Multiple Use Sustained Yield Act (MUSYA) had carried forward the Organic Act's direction that forests were to be managed for "preserving the living and growing timber and promoting the younger growth."<sup>1</sup> MUSYA confirmed that National Forests are to be managed for "timber" as well as other uses. 16 U.S.C. § 528. It reaffirmed the Organic Act's purpose "to furnish a continuous supply of timber for the use and necessities of citizens of the United States." 16 U.S.C.A. § 475.

The "younger growth" language from the Organic Act was ruled to restrict certain types of management. NFMA adopted a more balanced approach, amending the language of the Organic Act that directed "promoting the younger growth" to NFMA Sec. 6(m)(1), 16 U.S.C. 1604(m)(1): "prior to harvest, stands of trees throughout the National Forest System shall generally have reached the culmination of mean annual increment of growth[.]" In eastern Oregon that culmination occurs at about 100 to 120 years. If the Forest is not intensively managing its plantations, it is not furnishing a continuous supply of timber, nor is it promoting younger growth that has been part of forest policy from the beginning. AFRC requests that the Environmental Impact Statement describes how the proposed action will meet the requirements of NFMA stated above.

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<sup>1</sup> (USFS Organic Act, Act of June 4, 1897, 55 Cong. ch. 2, § 1, 30 Stat. 11, 35)

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 “cable” with a description of the objectives and outcomes desired. Locking in the specific type of logging system in the NEPA document removes flexibility during the implementation stage.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are rigid operating restrictions. We understand that the Forest Service must take necessary precautions to protect natural 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 EAs and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift 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. This includes seasonal operating restrictions around goshawk nests, elk calving areas, etc.

### **RCA Treatments**

AFRC fully supports treatments in RCAs and encourages the Payette to be aggressive in the number of stream miles treated. RCAs are the most productive areas on the landscape and change rapidly over time. The next entry may be too late given the extreme fire seasons that this area has been experiencing over the last decade.

### **Roads**

AFRC does not support road decommissioning. Road infrastructure is extremely important, and expensive to construct. It may be necessary to utilize these roads again in the future. With the road bed already in place the costs of re-opening are reduced. Seasonal closures or other measures to close roads that are utilized rather than “decommissioning” should be considered if possible. It is important for the Payette to consider future management, resource and emergency services needs in the Huckleberry planning area. Will there be sufficient road infrastructure for economic re-entry and follow-thinning? Are there needs for emergency evacuation routes through the Forest in WUI areas such as Cuprum and Huntley Gulch?

### **Climate Change**

Carbon sequestration as it relates to climate change is a topic that often gets broadly analyzed in NEPA documents. The analysis that the Forest Service will likely be conducting through the ensuing environmental analysis will discuss forest health benefits, effects on carbon sequestration and storage potential and meeting the purpose and need all within the context of an economically viable timber sale. Blavk Mountain consists of a variety of treatments, including precommercial and commercial thinning, which may affect the treated stands ability to resist, respond, or be resilient to climate change in the project area. The direct, indirect, and cumulative effects of carbon sequestration and storage and its relationship to climate change regarding this project must be viewed at much larger scales than the general project area because the scientific

literature regarding these, only support analysis on larger scales. There is a large body of literature on management strategies that have the greatest carbon sequestration benefit. In general, actively managing the forest will produce a positive net increase in carbon sequestration thus a positive benefit to reducing anthropogenic effects on climate change (IPCC, 2007). AFRC urges you to analyze the type of treatments being proposed and determine through the literature how they will affect carbon sequestration potential through time.

### **Alternatives**

AFRC supports implementation of Alternative 3 on Huckleberry. Alternative 3 maximizes volume produced and will implement 2,320 acres of patch cuts to enhance early seral conditions in the area. Alternative 3 will maximize the commercial volume produced which provides more revenue to implement other resource and recreation improvements. Alternative 3 has approximately 23 miles less permanent road decommissioning. AFRC requests that the deciding officer select Alternative 3 as the preferred alternative.

Thank you for the opportunity to provide DEIS comments on the Huckleberry project I look forward to following the implementation of this project as it moves forward. Please feel free to contact me if I can assist you with determining the economic feasibility of silviculture treatments and logging system requirements.

Sincerely,

A handwritten signature in cursive script that reads "Irene K. Jerome".

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