

Friends of the Clearwater

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BRING INVENTORIED ROADLESS AREAS IN IDAHO BACK UNDER THE SAME PROTECTION AS INVENTORIED ROADLESS AREAS NATIONWIDE

National inventoried roadless areas in Idaho are managed under the Idaho Roadless Rule (Idaho Rule), which is based on logging rather than science. The Idaho Rule permits cutting, selling, and removing timber from Inventoried Roadless Areas (IRAs) purportedly to reduce "uncharacteristic wildland fire effects" or reduce "hazardous fuel conditions" near a community. Scientific findings demonstrate the following:

- * Severe forest fires have been part of the Rocky Mountain fire regime for the last several hundred years; severe, stand-replacing fires are not "uncharacteristic" to national forests in Idaho, and are primarily driven by climate and weather, not fuels.¹
- * Cutting, selling, and removing trees in some cases can increase severe fire risk.²
- * Protecting private property from wildfire loss means treating the 130 feet immediately surrounding the structure; ignitable structures can be lost in even low-severity wildfires.³
- * Cutting and removing trees contributes far more carbon emissions than wildfire, thus contributing to global warming and the climate that drive severe fires.⁴
- * To effectively mitigate worse impacts of climate change, a growing scientific consensus observes that we must "substantially *increase* protection our native forests in order to absorb more CO2 from the atmosphere and store more, not less, carbon in our forests." 5

The Idaho Rule has permissive exceptions for cutting, selling, and removing timber in federal inventoried roadless areas. The Idaho Rule permits expansive and discretionary logging in over seven million acres of national-forest IRAs, not limited to tree size or amount. The Idaho Rule has *absolutely no restrictions* for logging 405,900 acres of the nation's IRAs.⁶

The logging impacts of the Idaho Roadless Rule have far exceeded Forest Service projections. In the 2008 environmental impact statement for the Idaho Rule, the Forest Service projected the Idaho Rule would allow approximately 15,000 acres of logging in national-forest IRAs over the next 15 years. In 2020, the rule had been in place for 12 years, and the Forest Service's own records total **86,000 acres** of national IRAs in Idaho where the agency has already approved or is considering logging projects. ⁷

References:	
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¹ "Fuel reduction also has been overpromised to be effective, using questionable logic and unvalidated models." DellaSala et al. 2015, Ch. 13, p. 383 in <u>The Ecological Importance of Mixed Severity Fires:</u> Nature's Phoenix.

² Bradley et al. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? Ecosphere 7(10) e 01492: pp. 1-13.

³ Cohen, J.D. 2000. Preventing Disaster: Home Ignitability in the Wildland-Urban Interface, Journal of Forestry, pp. 15-21.

⁴ Campbell et al. 2012. Can fuel-reduction treatments really increase forest carbon storage in the western US by reducing future fire emissions? Front Ecol. Environ 2012; 10(2): 83–90. Harris et al. 2016. Attribution of net carbon change by disturbance type across forest lands of the coterminous United States. Carbon Balance Manage (2016) 11:24, DOI 10.1186/s13021-016-0066-5

⁵ Letter to Congress from Scientists concerned about climate and biodiversity impact of logging (May 13, 2020)

⁶ 73 Fed. Reg. 61456, 61479; 36 C.F.R. § 294.24(b), (c), (d); see also <u>Bilodeau & Macfarlane</u>, <u>The Roadless Report: Analyzing the Impacts of Two Roadless Rules on Forested Wildlands</u>, pp. 14-20.

⁷ USDA Forest Service 2008. Roadless Area Conservation National Forest System Lands in Idaho Final Environmental Impact Statement (Vol. 1) Summary, p. 10; <u>USDA Forest Service 2020 Region 1 Idaho</u> IRA project spreadsheet.