



VIA Link: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=57827>

May 9, 2023

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide an Objection Support Letter for the Dead Laundry Project.

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. Many of our members have their operations in communities within and adjacent to the Nez Perce-Clearwater 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 is not writing to file an Objection to the Dead Laundry Project, rather this is a letter of support for the Project to move forward, and some suggestions on how to improve implementation. AFRC submitted scoping comments on March 26, 2020, and Draft EA comments on June 28, 2021. AFRC also provided an Objection Letter of Support on February 8, 2022. However, on March 25, 2022, Forest Supervisor Cheryl Probert withdrew the draft Decision Notice and issued a new Draft Decision and FONSI on April 26, 2023. The Draft Decision and FONSI substantially changed parts of the Project due to public comment and review of proposed actions.

The Forest has redefined the Needs for the Project in the FONSI because of the large variance between existing and desired conditions.

AFRC supports the Needs as outlined in the FONSI which are:

- There is a need to reduce hazardous fuels in the project area.
- There is a need to address forest health issues in the project area.
- There is a need to change the forested vegetation in the Dead Laundry project area.
- There is a need add up to 12 miles of permanent road to the existing system for future management access.

AFRC continues to support the Proposed Action (Alternative 2 Modified) which calls for approximately 2,057 acres of regeneration harvest. The Intermediate harvests in the Old Growth Units were dropped. While AFRC is disappointed that the Forest has dropped all Old Growth Enhancement Projects we understand that harvesting in Old Growth areas has been problematic considering recent court decisions. We do support the 56 acres of non-commercial treatments in Old Growth using hand or mechanical means, mostly near the WUI. While treatment acres are reduced from the 3,837 acres proposed in the Draft EA, AFRC understands the rationale behind the decision by the District to remove some acres. The majority of treatments will maintain and/or re-establish long-lived early seral species by reducing stand densities and addressing insect and disease infestations. We want the District to understand that AFRC members depend on a predictable and economical supply of timber products from Forest Service land to run their businesses and provide useful wood products to the American public. This supply is important for present-day needs but also important for future needs. 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 Dead Laundry 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 by this project is paramount. Studies by the University of Idaho have shown that as many as 18-22 direct and indirect jobs are created for every million board feet of timber that is harvested. The volume harvested in this project will greatly help industry and surrounding communities.

AFRC supports the Forest's plan to create 14 openings larger than 40 acres. With the history of past logging and dense unhealthy stands of second growth timber, harvest in the project area would be conducted through a combination of intermediate treatments and variable retention regeneration harvest. Regeneration harvest may include areas of full retention (clumps), irregular edges, and retention of snags and legacy trees to provide structure and a future source of woody debris. Implementing these opening sizes will require approval from the Regional Forester. AFRC supports this request and urges the Forest to pursue full implementation of the approved treatments. These regeneration treatments will improve forest health, assist in fuels reduction, and provide early seral habitat for deer and elk.

We again remind the District that there are approximately 30 structures across these three remote areas of private inholdings that are primarily used as summer recreation homes. Few residences have year-round occupants. Commercial harvest and hazardous fuels treatments will greatly reduce fire behavior and intensity adjacent to private lands increasing the probability of successful protection of property in the event of a wildfire. AFRC encourages the Forest to thin down to 40 sq. ft. of basal area along all WUI boundaries for both fire prevention and to check any spread of insects and disease onto private lands. The proposed 640 acres of hazardous fuels treatment within the Wildland Urban Interface (WUI) area of Deception Saddle and Independence Creek will directly affect the surface fuel loading and vertical continuity of the vegetation adjacent to the private property. These treatments will increase the success of suppression resources to extinguish fires and stop movement from federal lands onto private lands. The Proposed Action would cause a beneficial impact to the condition of the fuels within the project area, especially considering the foreseeable advent of natural fire ignitions.

The Decision Notice for Dead Laundry calls for construction of approximately 12 miles of permanent roads and 30 miles of temporary roads to facilitate harvest. The 30 miles of temporary roads will be **decommissioned** after all project activities and completed. In fact, the Plan calls for *“Decommissioning temporary roads and skid trails from both past and present activities will occur under the action alternative. This includes decompacting, recontouring, and recovery of excavated and displaced topsoil, and is expected to initiate and facilitate the recovery of soil productivity.”* We appreciate the District’s consideration of permanent road construction. AFRC would like to remind the Forest that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The land base covered in the Dead Laundry project area is to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency’s ability to achieve these objectives and is very concerning to us.

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Further, AFRC believes that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency’s subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to attack nascent fires quickly and directly. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.

During implementation we ask that the District keep in mind that the primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. AFRC understands that all timber harvest and road maintenance activities will be prohibited

from January 1-March 30 in Units 30, 33C, 33D, 33E, 70, and 108, to retain security and reduce stress for wintering ungulates. The plan currently calls for ground-based equipment to operate on slopes less than 45% and tractor skidding should occur on slopes less than 35%. As stated above, we understand that the Forest Service 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 EA's and contracts (i.e., dry conditions during wet season, wet conditions during dry season).

The Forest has done a good job on the economic analysis as mentioned above; however, we believe there are further opportunities to increase the economic feasibility of this Project by implementing practical operational protocols. We would like the Forest Service to shift their 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. There are a variety of operators that work in the Nez Perce-Clearwater market area with a variety of skills and equipment. Developing a final EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the final EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Tethered-assist equipment is also becoming a more viable and available option for felling and yarding on steep slopes. This equipment has been shown to contribute little additional ground disturbance when compared to traditional cable systems. Please consider modifying your NEPA analysis documents in a manner that will facilitate this type of equipment. AFRC suggests that the Forest look at allowing all ground skidding on this project on slopes up to 45%. We believe you have that flexibility since your document also states, *"Exceptions can be authorized where soil, slope and equipment are determined appropriate to maintain soil functions."*

AFRC supports the prescribed burning of 1,351 acres within the Moose Mountain IRA. We also support commercial harvesting 59 acres of E-1 Management Area ground adjacent to the Hoodoo Roadless Area which is located near the Dead Laundry Project.

In both our scoping and Draft EA comments we suggested the Forest consider implementing shaded fuel breaks up to 150 feet on both sides of the roads. These breaks can address both forest health issues and reduce the risk of wildfire along routes that are needed for ingress and egress into the National Forest. The shaded fuel breaks may also be used within the Idaho Roadless Areas (IRAs) located within the project. AFRC believes fuel break treatment during

this entry to improve safety along the travel corridors would be appropriate. The Forest is proposing these treatments in the End of World Project and others, and we believe they have a lot of merit.

The Forest Provided this background information on Climate Change: *“The combined Nez Perce-Clearwater National Forests represent a very small amount of the carbon stored in forests in the United States (Heath et al. 2011). Given the available data and tools (USDA 2015; USDA 2016a), patterns and trends of carbon dynamics are best determined at larger scales and over long periods of time. This project and others taking place on the forest will at most affect a very small percentage of the forest carbon stocks, and a small fractional proportion of the total forest carbon stocks of the United States. The affected forest lands in this proposal would remain forests, not be converted to other land uses, and long-term forest services and benefits would be maintained. As such, the long-term cumulative effects of forest management will have little impact overall on a potential future scenario of carbon accumulation and loss. None of the alternatives would have a measurable impact on carbon stocks in either the short nor long term, because the area of treatment is a small fraction relative to regional and global carbon stocks (Z-001; NPC Forests Carbon Cycling and Storage Specialist Report).”*

In addition to this information, AFRC would like you to supplement your record for this Project and others by including the following.

We would like to encourage the Forest to consider several documents related to carbon sequestration and related 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:

- a. 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.
- b. 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.
- c. 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:

- a. 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.
- b. 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. Links to the above-mentioned studies can be found at:

Lisa McCauley article on large scale forest restoration stabilizes carbon:
<https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/eap.1979>

Andrew Gray article on Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity:
<https://www.fs.usda.gov/treearch/pubs/52237>

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 (Gustavsson 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.

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.

AFRC still believes there are opportunities to manage within the Riparian Areas with the Forest using the following parameters- *“Apply silvicultural practices for Riparian Habitat Conservation Areas to acquire desired vegetation characteristics where needed to attain Riparian Management Objectives. Apply silvicultural practices in a manner that does not retard attainment of Riparian Management Objectives and that avoids adverse effects on listed anadromous fish.”*

AFRC believes that it has been well documented that thinning in riparian areas accelerates the stand’s trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. The Pacfish/Infish strategy describes the need for treatments that meet the need of multiple habitat types, and we encourage the North Fork District to look for ways to incorporate treatments that meet those needs. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that the Forest Plan mandates should be considered.

The tradeoffs that the Forest Service will likely be considering through the ensuing environmental analysis will be between achieving these forest health benefits and potentially having adverse impacts to streams. These impacts to streams typically include stream temperature, wood recruitment, and sedimentation associated with active management. We would like the Forest Service to review the literature cited below and incorporate its findings into your environmental analysis that will shape the level of management permitted to occur in riparian reserves.

Stream temperature

Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management*, 270, 302-313.

Key points of the Janisch paper include:

- The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature.
- Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.

Anderson P.D., Larson D.J., Chan, S.S. 2007 Riparian Buffer and Density Management Influences on Microclimate of Young Headwater Forests of Western Oregon. *Forest Science*, 53(2):254-269.

Key points of the Anderson paper include:

- With no-harvest buffers of 15 meters (49 feet), maximum air temperature above stream centers was less than one-degree Celsius greater than for unthinned stands.

Riparian reserve gaps

Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old growth versus early-mature riparian forests in western Oregon. *Aquatic Sciences* 75:547558.

Key points of the Warren paper include:

- Canopy gaps were particularly important in creating variable light within and between reaches.
- Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests.

Wood Recruitment

Burton, Julia I., Olson, Deanna H., and Puettmann, Klaus J. 2016. Effects of riparian buffer width on wood loading in headwater streams after repeated forest thinning. *Forest Ecology and Management*. 372 (2016) 247-257.

Key points of the Burton paper include:

- Wood volume in early stages of decay was higher in stream reaches with a narrow 6meter buffer than in stream reaches with larger 15- and 70-meter buffers and in unthinned reference units.
- 82% of sourced wood in early stages of decay originated from within 15 meters of streams.

Sedimentation

Rashin, E., C. Clishe, A. Loch and J. Bell. 2006. Effectiveness of timber harvest practices for controlling sediment related water quality impacts. *Journal of the American Water Resources Association*. Paper No. 01162

Key points of the Rashin paper include:

- Vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment.

Collectively, we believe that this literature suggests that there exists a declining rate of returns for “protective” measures such as no-cut buffers beyond 30-40 feet. Resource values such as thermal regulation and coarse wood recruitment begin to diminish in scale as no-cut buffers become much larger. We believe that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood recruitment, based on this scientific literature. We urge the Forest Service to establish no-cut buffers along streams no larger than 40 feet and maximize forest health outcomes beyond this buffer.

Thank you for the opportunity to provide an Objection Support letter for the Dead Laundry Project. We look forward to seeing this Project implemented in the near future.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin", with a stylized, flowing script.

Tom Partin
AFRC Consultant
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Portland, Oregon 97239