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February 5, 2024

Linda Jackson, Forest Supervisor  
Payette National Forest  
500 N. Mission St. Bld. # 2  
McCall, ID 83638

Dear Supervisor Jackson:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments on the draft environmental assessment (EA) on the Granite Goose Landscape Restoration Project (Granite Goose) located on the New Meadows and McCall Ranger Districts of the Payette National Forest. The planning area encompasses approximately 39,918 acres and proposes a wide variety of resource treatments including over 9000 acres of harvest treatments that will produce a significant volume of merchantable timber. This area is 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. The management of these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector because more than 50% of all manufacturing jobs are in wood manufacturing.

## Purpose & Need—Move Forest Stands Within the Project Area Toward Vegetative Desired Conditions

AFRC strongly encourages treating as many acres that are in need of treatment as possible, and strongly encourages treatment of the majority of mature timber stands, either through free thinning across all age classes or through regeneration and patch cut harvests within the Granite Goose planning area. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. The treatments on the Granite Goose project will likely provide short-term products for the local industry, and we want to ensure this provision is an important consideration for the decision-maker as the project progresses. The consideration of active management on every acre of appropriate land, regardless of its land allocation, is important to our membership, because each year's timber sale program is a function of the treatment of aggregate forested stands across the landscape. As we will discuss later in our comments, the importance of our members' ability to harvest and remove these timber products from the timber sales generated off this project is paramount to a principal objective to any project proposed on the National Forest System (NFS), land particularly those lands designated as commodity emphasis, but also on lands with other designations. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on NFS lands. AFRC would like recognition of the critical importance of the local forest products industry by including the following statement in the Granite Goose purpose and need: ***Provide forest products to contribute to the economic sustainability of local communities.***

Various laws direct and allow the Forest Service to provide a sustainable supply of timber and other forest products from the Nation's forests including the Multiple-Use Sustained Yield Act (MUSYA) of 1960 and the National Forest Management Act (NFMA) of 1976. The MUSYA authorizes and directs the Secretary of Agriculture to develop and administer the renewable resources of timber, range water, recreation, and wildlife on the national forests for multiple use and sustained yield of the products and services. NFMA is the primary statute governing the administration of national forests. This Act requires the Secretary of Agriculture to assess forest lands, develop a management program based on multiple-use and sustained-yield principles and to implement a resource management plan for each unit of the NFS. We appreciate the Payette proposing a variety of silvicultural treatments to meet objectives in the project area. A management paradigm based exclusively on understory thinning treatments is ultimately unsustainable without a regeneration component. We urge you to acknowledge and emphasize this notion in the final analysis.

The above strategies imply that removal of more of the mature and large trees may be necessary to achieve the desired conditions outlined in the Granite Goose Purpose & Need. The

survival of the most desirable trees on the landscape may require modified silvicultural prescriptions. AFRC requests that the Forest consider the strategies and approach as described above, especially on sites that are drier or where tree health and vigor is already poor.

## Operations

The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. 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, wildlife restrictions, recreation restrictions). 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 New Meadows and McCall market area with a variety of skills and equipment. Developing an 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 Granite Goose Final EA and future contracts 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. Some of the Granite Goose proposal area has steeper slopes (greater than 40 percent), and there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units. Granite Goose mentions "off-road jammers, skyline-excaline or helicopter harvest systems are examples of systems which could be used". However, what is clearly missing is the use of

“tethered/traction assist systems” which are now available in this area. Tethered-assist logging is becoming a more economical, safe, and available method of yarding on steep slopes. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. Other Forests in both Regions 1 and 6 have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. However, while this equipment provides greatly increased flexibility with regard to logging steeper slopes, it is critical to remember that it is not a less expensive alternative than traditional cable/skyline logging systems.

Green, P. Q., Chung, W., Leshchinsky, B., Belart, F., Sessions, J., Fitzgerald, S. A., Wimer, J. A., Cushing, T., Garland, J. J. (2019). Insight into the productivity, cost and soil impacts of cable-assisted harvester-forwarder thinning in western Oregon. *For. Sci.* 66(1):82–96

Key Point of the Green paper include:

- The use of cable assistance can reduce track coverage and reduce shear displacement, and thus likely lessen potential soil impact caused by forestry machines.

Garland, J., F. Belart, R. Crawford, W. Chung, T. Cushing, S. Fitzgerald, P. Green, *et al.* 2019. Safety in steep slope logging operations. *J. Agromedicine* 24(2):138–145.

Key Point of the Garland paper include:

- Use of new tethered-assist technology reduces exposure to hazards and reduces workers exposed to the most dangerous work in logging—felling and working on cable operations on steep slopes.

Green, P. Q., Chung, W., Leshchinsky, B., Belart, F., Sessions, J., Fitzgerald, S. A., Wimer, J. A., Cushing, T., Garland, J. J. (2019). Insight into the productivity, cost and soil impacts of cable-assisted harvester-forwarder thinning in western Oregon. *For. Sci.* 66(1):82–96

Key Points of the Green paper include:

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Provisions that would allow for removal of biomass and nonmerchantable material that is subject to agreement may be necessary on Granite Goose. Weight scale rather than tree measurement should be considered on merchantable material given the discrepancies between

Forest Service cruising methods and industry merchantability standards. Flexibility on the product removal side will be key to effective implementation and meeting objectives on the Granite Goose project. Granite Goose proposes to implement “sanitation salvage” of subalpine fir for various uses including potential “commercial” outlets. It is highly unlikely that there will be much appetite for this material through traditional forest industry outlets. AFRC encourages the Forest to continue to seek other outlets for the material as already discussed in the DEA.

AFRC fully supports treatments in riparian habitat conservation areas (RHCAs) and encourages the Forest to maximize treatment of those stands in need. RHCAs 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. We would like the Forest to consider the document cited below, which is specific to riparian management in dry forest landscapes. We believe this paper emphasizes the need to actively manage these riparian areas to meet the stated objectives described in the scoping notice for this project.

Messier, Michael S., Shatford, Jeff P.A., and Hibbs, David E. 2011. Fire Exclusion effects on riparian forest dynamics in southwestern Oregon. *Forest Ecology and Management*. 264 (2012) 60-71.

Key points of the Messier paper include:

- Fire exclusion has altered the structure, composition, and successional trajectory of riparian forests in fire-prone landscapes.
- Fire exclusion has been associated with increase in tree density and recruitment of shade-tolerate species that may replace large diameter, more decay-resistant Douglas-fir trees.
- A hands-off management regime for these riparian forests will have ecologically undesirable consequences.

## Prescribed Burning

Granite Goose project proposes extensive prescribed burning, including landscape level fire applied across the landscape. AFRC supports the strategic use of fire following mechanical treatment when necessary to achieve desired end results. We also understand that prescribed fire, even when carefully planned implemented, comes with some level of risk. That risk often materializes as undesired fire intensity and severity that not only impacts federal forests but also neighboring lands. AFRC urges the Payette to communicate with various stakeholders and impact members of the public to review objectives and end results of the burning program.

## Road Decommissioning

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 road decommissioning proposed in the Granite Goose scoping notice likely represents a ***permanent*** removal of these roads, and likely the deferral of management of those forest stands to which they provide access. The land base covered in the Granite Goose project area are to be managed for a variety of forest management objectives. Removal of adequate future access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us. We would like the Forest to carefully consider the following three factors when making a decision to decommission any road in the project area:

1. Determination of any potential resource risk related to a road segment
2. Determination of the access value provided by a road segment
3. Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.

## Carbon/Climate

Appendix B lists impacts to Climate Change as an issue considered but not analyzed in detail. As a project scoped after January 1, 2023, the Granite Goose Project should follow the interim CEQ regulations (dated January 9, 2023) pertaining to the analysis of this resource. Specifically, those regulations require that greenhouse gas emissions be analyzed for all federal actions. Those regulations also encourage federal agencies to consider the context of short-term emissions as a result of actions that will improve long term sequestration and storage. We strongly believe that the minor, short-term emissions associated with timber harvest and other associated treatments are dwarfed by the long-term benefits associated with such treatments.

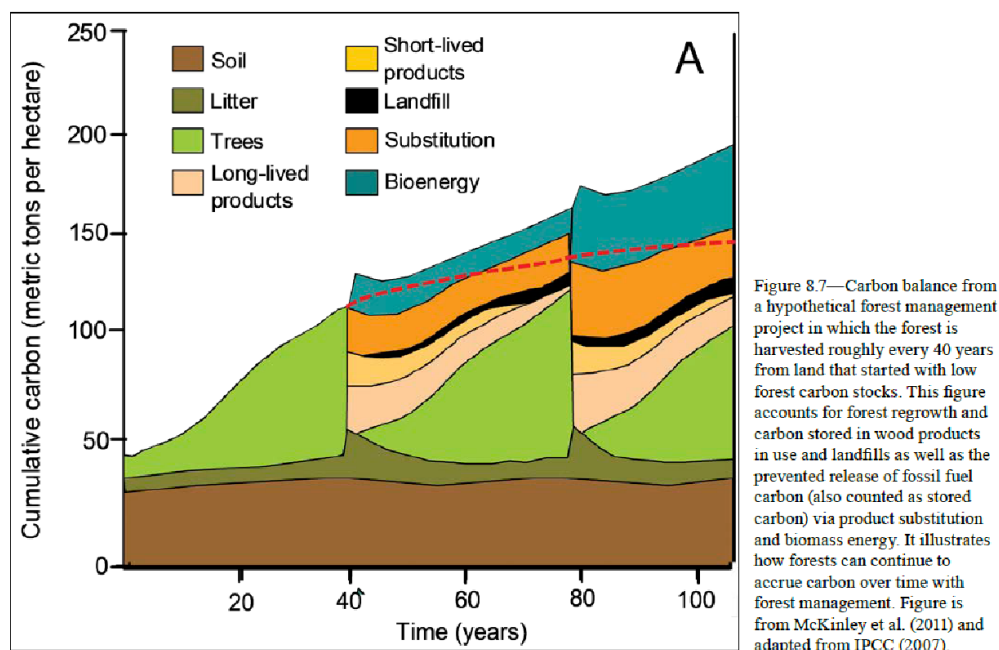
We urge the District to clearly outline how the proposed treatments, while possibly emitting carbon in the near term, would ultimately benefit climate change mitigation goals by 1.) reducing the likelihood of carbon emissions through wildfire; 2.) increasing the rate of carbon sequestration by reducing competition to residual trees; and 3.) storing carbon in long lasting wood products that would otherwise be at risk of loss through wildfire. Carbon loss through high intensity wildfire has become a leading cause of our national forests transitioning from carbon sinks to carbon sources. Active management to reduce such a transition would not only reduce carbon loss but accelerate carbon sequestration. And ultimately, any timber products

harvested to further these two objectives has been shown to have long lasting carbon storage potential.

Please consider the points below from a technical report by the Climate Change Vulnerability Assessment and Adaptation Project (SWOAP) in Southwest Oregon.

- Wood harvested from the forest, especially timber used for durable structures, can be reservoirs of long-term carbon storage (Bergman et al. 2014).
- Forests and their products embody a closed-loop system in which emissions associated with harvests and product use are eventually recovered as forests regrow.
- Although products may be retired in solid waste disposal sites, they decompose quite slowly, causing carbon to continue to be stored for many decades.
- Products derived from the harvest of timber from national forests reduce carbon emissions by substituting for more energy-intensive materials including concrete, steel, and plastics.

Please see the graph below from the IPCC (2007) that captures the ability of forests to “stack” carbon sequestration and storage through continual harvests. **Please consider adopting this graph into the Final Granite Goose project analysis.**



We believe that this graph encapsulates the forest management paradigm that would be most effective at maximizing carbon sequestration on a per-acre basis by “stacking” storage in wood products and regrowth of newly planted trees.

We would like to encourage the New Meadows District to consider several documents related to carbon sequestration related to 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:

- 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.
- 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.
- 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.

Thank you for the opportunity to provide EA comments on the Granite Goose project. We 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,



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