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Comments: Attached are AFRC's scoping comments on the Dead Laundry Project. Please keep me informed as this moves to the Draft EA phase of planning. Thank you, Tom Partin AFRC Consultant

VIA Mail: comments-northern-clearwater-north-fork@usda.gov

March 26, 2020

North Fork Ranger District

Attn: District Ranger

12740 US HWY 12

Orofino, ID 83544.

Dear Dead Laundry Planner:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on 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.

The Dead Laundry Project which is located in the Laundry Ridge area encompasses 40,565 acres, all of which is on National Forest System (NFS) lands with the exception of private inholdings in the Deception Saddle, Moose, and Independence Creek areas. The Dead Laundry project area is located across four subwatersheds - Lake Creek, Elizabeth Creek - North Fork Clearwater River, Osier Creek, and Deadwood Creek-Moose Creek. The general purpose of this project is to reduce hazardous fuel loading and potential fire severity, provide opportunities to safely engage fire to protect private inholdings, and improve overall forest health and ecological function toward desired future conditions. The majority of the Dead Laundry project area is identified by the Forest Plan as Management Area (MA) E1, Timber Management.

Most of the project area has been absent of fire since the event of 1910 or shows no fire history at all. This has resulted in decades of surface fuel buildup within stands in both roadless and roaded areas. The heart of the project area contains private inholdings and has been identified as Wildland Urban Interface

(WUI) by Clearwater County. In the project area, fires that occurred in 1910 and 1934 and the introduction of white pine blister rust have created a homogeneous age class and species composition which has become highly susceptible to insect and disease change agents. These factors combined with the exclusion of natural fire on the landscape have created a condition that puts the private inholdings at higher risk for property loss and or damage due to the potential for extreme fire behavior.

The Forest has developed the Purpose and Need for the project because of the large variance between existing and desired conditions in the project area due to the conditions mentioned above. AFRC supports the Primary Purposes of the Dead Laundry project which are:

[bull] Reduce hazardous fuel loading within the project area to provide protection for the wildland urban interface areas associated with private inholdings within the project area.

[bull] Harvest wood products to sustain local and regional economies.

[bull] Improve forest health and resiliency in concurrence with desired conditions and objectives identified in the Forest Plan.

AFRC supports the Purpose for the Dead Laundry Project, however, we offer the following comments that we believe will strengthen and improve the Project.

1. While AFRC is pleased that the Forest will commercially treat 3,597 acres of the 40,565 acres in the Project area (about 9%), we would like the Forest to use the best stand exam and on-site information to make sure all available acres needing treatment are included. AFRC believes the Forest should take every opportunity to treat a maximum number of acres to:

a. Accomplish the needed hazardous fuels reduction for the protection of both Forest Service and the private land in the WUI for the prevention of large catastrophic wildfires.

b. Convert the homogeneous stands of cedar and grand fir into more fire resistant species such as western larch and ponderosa pine.

c. Treating more acres commercially and generating more volume helps to reduce the per thousand cost of doing the NEPA work.

d. Treating more acres and harvesting more volume also helps to generate timber receipts that can be used to improve other resources within the project area.

e. Provide early seral habitat for deer and elk.

f. Maximize timber volume for the forest products industry.

2. 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 effect 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 off 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 the industry and surrounding communities.

3. 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.

a. In order to implement the needed treatments some regeneration units will need to be larger than 40 acres. There are 28 units proposed that would create openings greater than 40 acres in size. This will require approval from the Regional Forester prior to implementation. 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.

b. AFRC also encourages the Forest, when using intermediate treatments, to thin the stands to 40 sq.ft. of basal area. This will help in fuels reduction in and around the WUI and provide maximum vigor for the remaining trees.

The project area is outside of desired conditions for dominance types, with a high proportion of the project area (80%) in the shade tolerant dominance types of grand fir, Douglas-fir, and western red cedar. Thus, a conversion to western white pine, western larch, ponderosa pine, and lodge pole pine is needed.

4. 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). 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 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 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 shown to contribute little additional ground disturbance when compared to traditional cable systems. Please prepare your NEPA

analysis documents in a manner that will facilitate this type of equipment. AFRC suggests that the Forest look at allowing ground skidding on this project on slopes up to 45%.

5. The Forest is planning on 300 acres of old-growth enhancement in the Dead Laundry Project. These stands are dominated by an overstory of large (over 36 in. DBH) cedar trees. These stands have an understory component of grand fir and Douglas fir trees that are susceptible to disease and the potential for a high severity wildfire. AFRC supports management in these stands to ensure their health and safety by removing the ladder fuels of smaller grand and Douglas-fir trees.

6. To accomplish the necessary treatments across the landscape in the Dead Laundry Project the following road work is being proposed.

Some of the roads that are being built or reconstructed for commercial harvest ultimately are planned for obliteration, further stabilization, or rehabilitation and revegetating the disturbed soils as needed to restore soil functions and productivity.

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 road decommissioning proposed in the Dead Laundry scoping notice likely represents a permanent removal of these roads and likely the deferral of management of those forest stands that they provide access to. The land base covered in the Dead Laundry project area are 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.

We would like the District 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.

7. AFRC suggests the Forest look at 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 this is favorable to get these areas treated during this entry to improve safety along the travel corridors. The Forest is proposing this treatment in the End of World Project and we believe it has a lot of merit.

8. The Forest is planning on managing in the Riparian Areas with 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 ACS 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 ACS 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* 75:547-558.

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 6-meter 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.

9. We would like to encourage the North Fork District to consider a newly published document that considers the long-term impacts of forest thinning and forest restoration on carbon sequestration.

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:

[bull]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.

[bull]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.

[bull]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.

10. AFRC believes the Forest has done a good job of analyzing and planning for the protection of sensitive species such as Bald and Golden Eagles, Goshawk, Norther Rockies Lynx and aquatic species such as Bull Trout. We support the protections you plan to put in place.

11. AFRC believes that the work being proposed in the Dead Laundry Project should be analyzed using an Environmental Assessment. The work to be done will greatly benefit the resources in the Project area with no significant impacts.

Thank you for the opportunity to provide scoping comments on the Dead Laundry Project. I look forward to seeing the Draft EA for this project as it moves forward.

Sincerely,

Tom Partin

AFRC Consultant