



VIA Email: appeals-northern-regional-office@usda.gov

April 7, 2021

Objection Reviewing Officer
Northern Region
USDA Forest Service
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 a letter of support for the Green Horse Project which is currently in the Objection Period.

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 submit a formal objection, since the objection period is open, but rather to voice our support for the Green Horse Project and specifically for implementation of the Proposed Action. AFRC has been very supportive in the development of this Project and provided Scoping/Draft EA comments on March 16, 2020.

For background, the Green Horse project area is within an area on the Nez Perce-Clearwater National Forest that has been affected by the western hemlock looper. The Forest Service is proposing a suite of activities to meet the need for treating forest health issues including 1,693 acres of commercial harvest.

AFRC supported the Purpose and Need for the project which includes:

1. Improve forest health and provide a sustained yield of resource outputs as directed in the Forest Plan by:
 - Reducing the extent of insect and disease infection; and
 - Altering species composition to include more early seral species that are less susceptible to disease infection.
2. Reduce hazardous fuels and wildfire risk:
 - Along roads for public and firefighter safety, including ingress/egress.
 - To protect timber resources; and
 - To maintain recreational opportunities within the area.

AFRC continues to support the Project for many of the same reasons that we submitted during the scoping/Draft EA comment period including:

1. The hemlock looper infestation areas need to be quickly treated, and hopefully can occur as early as 2022. Outbreaks such as these tend to linger and continue to cause mortality for many years especially with the dense stands of shade tolerant species found in the area. AFRC further supports the Forest using regeneration harvests on 1,513 acres to both salvage the dead and dying timber and to reduce the fuels loading in the areas. The current dense stands of shade tolerant species (primarily grand fir) create a very favorable habitat for the western hemlock looper to flourish.
2. To implement the needed treatments some regeneration units will need to be larger than 40 acres. Table 1 below outlines the specific units that are larger than 40 acres in size. The number of acres needing regeneration harvests has decreased to 957 acres down from 1,327 acres during initial scoping. AFRC supports regeneration treatments in unit sizes over 40 acres.

Table 1. Proposed regeneration harvest units that are larger than 40 acres that may result in openings greater than 40 acres

Opening No.	Unit No.	Acres
1	1	47
2	2	48
3	3	53
4	9	56
5	10	142
6	11	45
7	16	46
8	17	406
9	18	51
10	23	63

3. AFRC also supports the Forest using 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 on approximately 180 acres. AFRC believes this is favorable to get these areas treated during this entry to improve safety along the travel corridors.

4. AFRC believes the Forest should remain flexible in possibly treating more acres in the Green Horse Project to address new insect outbreaks. While the Forest is planning to commercially treat 1,693 acres, this only represents about 18% of the project area. There are multiple compelling reasons for keeping more management options open including the possible need to treat more heavy fuel loadings, further spread of the western hemlock looper infestation, and the fact that the forest products industry in the area is dependent on the volume from projects like this one.

AFRC members depend on a predictable and economical supply of timber products from Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present day needs but also important for needs in the future. 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 Green Horse 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 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.

5. We would like to again remind the Forest that 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 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 is pleased to see that ground skidding on this project will be allowed on sloped up to 45 percent.

6. AFRC supports the proposed road work on the sale which includes road reconditioning on approximately 20 road miles, road reconstruction on 19 miles, construct 2 miles of temporary roads, and obliterate all temporary roads. 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.

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.

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 Green Horse 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 Green Horse 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:

- a. Determination of any potential resource risk related to a road segment;
- b. Determination of the access value provided by a road segment ; and
- c. 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. In several R-1 objection resolution meetings that AFRC has participated in, some of the objectors raise the issue of lack of planning regarding carbon sequestration etc. In that light, we would like to encourage the Moose Creek Ranger 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:

- 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.

Thank you for the opportunity to provide support comments for the Green Horse Project. I look forward to seeing the Project implemented to address the hemlock looper issue.

Sincerely,



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