



VIA Link: <https://www.fs.usda.gov/project/?project=52079>

February 21, 2024

Cheryl Probert, Forest Supervisor
Nez Perce-Clearwater National Forest
1008 Highway 64
Kamiah, ID 83536

Dear Cheryl:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Dixie-Comstock Community Protection Project (Dixie-Comstock).

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 project area is 20 miles south of Elk City, Idaho and encompasses about 30,000 acres. The project area surrounds the town of Dixie, Idaho and 648 acres of private inholdings. The project area also includes several tributaries of the Salmon River which are in the Dixie-Comstock Community Wildfire Protection Plan. Fires have threatened the community of Dixie many times including the Rattlesnake Fire, Sheep Fire, Blue Fire, and the Dixie Fire. With this background and the history of fire in the area, AFRC is very pleased to support this Project and its objective to reduce hazardous fuels to implement community wildfire protection for the at-risk community of Dixie and the Comstock area. Much of the Project management will occur in the forested areas southwest of the Dixie and Comstock communities that have not burned or been otherwise treated since 1919 and earlier. The forest stands have become increasingly dense, dominated by shade-tolerant, non-fire resistant late-seral tree species such as grand fir, Englemann spruce and

subalpine fir. These species persist in the forest understory and provide ladder fuel for surface fires to transition to crown fires, which are difficult to control. Without natural fire or management treatments, both forest density and fuel loading are high, with large size dead and down woody material common. These conditions leave the forest at an increased risk of high intensity, stand-replacing wildfire especially during periods of increased fire danger.

AFRC also supports the Need for Action which includes:

- Reduce hazardous fuels in the proximity of the Dixie and Comstock communities.
- A project specific Forest Plan Amendment is needed related to old growth because there is not enough remaining old growth due to recent fire history to meet the Forest Plan requirements of Appendix N.
- Improve stand resilience to wildfires by increasing the presence of fire-resistant species and modifying stand structure.
- Change the amount of available fuel and the condition of vegetation for safe evacuation routes, safety zones around the local airstrip and provide defensible space for adjacent property.

While AFRC supports the Objective, and Purpose and Need for this Project we offer the following comments that we believe will strengthen and enhance the final planning document.

1. AFRC is pleased to see the District proposing vegetation management that will likely provide useful timber products to our membership. 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. 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 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. Our members depend on the suitable land base for a sustainable supply of timber products, as timber outputs on lands designated as reserves are merely a “byproduct.” Therefore, we would like the District to recognize the importance of this supply by including the provision of timber products in the Dixie-Comstock project’s purpose & need. It’s also important to note that for every million board feet of timber harvested in Idaho, 18-20 direct and indirect jobs are created.
2. Due to the ongoing wildfire crisis AFRC strongly supports the approval for an emergency action determination. (EAD) in conjunction with the Wildfire Crisis Strategy. This determination will make the ensuing Decision not subject to the objection process pursuant to 36 CFR 218, which will accelerate implementation of treatments designed to mitigate wildfire risk.
3. AFRC believes the District did a good job analyzing the No Action Alternative (Alternative A) and the potential consequences of taking no action. These consequences

highlight the need for the active management proposed in Alternative B. The recent history of fires illustrates why treatments are needed. Some of the No Action Alternative impacts are outlined below.

Hazardous Fuels Reduction:

No progress would be made towards the desired condition and the vegetation conditions would lead towards higher intensity fires. Consequently, the objectives of public and firefighter safety would be compromised as firefighters accepted increased risk. In addition, the Forest would continue to extinguish smaller fires in the backcountry to reduce the potential of a fire growing and impacting the communities. These actions usually involve extremely high costs to suppress and require firefighters to accept much elevated levels of risk.

Cumulative Effects

Fuels in all size classes would trend towards higher concentrations with increased fuel loading associated with mortality in the larger size classes. The increase in fire behavior associated with these conditions would have lasting ecological effects to the project area, and very dangerous conditions for the public trying to evacuate as well as responders asked to protect life and property.

Vegetation Management for Stand Resilience

The No Action alternative would perpetuate forest health decline and move the overall forested conditions further from the desired conditions necessary to meet the Forest Plan goals applicable to the project area, timber production on a sustained basis and maintenance of the natural range of variation.

These are only a few of the resources that will be negatively impacted if the No Action Alternative is adopted.

4. AFRC supports the District's request for a Forest Plan Amendment to modify standards applicable to old growth management. This amendment would expand the allowance for harvest in certain forest stands even though the area lacks old growth due to past wildfires. The 1987 Land and Resource Management Plan states that "it is necessary to maintain 10 percent of the total forested acres as old growth with no less than 5 percent of the forested acres maintained as old growth within each prescription watershed or combination of watersheds totaling 5,000 to 10,000 acres." There are 8 Old Growth Analysis Areas that overlap the project boundaries, and all have been affected by wildfire. In these areas the requirement to have no less than 5 percent maintained as old growth in each prescription watershed or combination of watersheds cannot be met. The Forest Plan Amendment is needed to allow management to take place. The proposed management would trend the forested conditions in the project area towards stand conditions that can develop old growth characteristics. In addition, treatments would help to meet Forest Plan goals and direction, and to promote forest conditions that are better able to withstand large-scale threats to their sustainability as well as provide for the safety of the public and firefighting personnel.

5. AFRC supports the proposed commercial logging plan covering 3,690 acres (12% of the project area). We would have preferred a higher percentage of the project area to be treated commercially, but we understand much of the area has been burned in the past by wildfire. The proposed action is listed below.

Logging System ⁵	Total Estimated Acres	Gospel-Hump IRA Est. Acres
Ground based (Tractor)	1,235	0
Cable (Skyline)	2,075	0
Helicopter	380	373
Hand / Mastication	630	0
TOTAL EST. TREATMENT ACRES*	4,320	373

As you begin to layout units and consider logging equipment, we would like to remind the District that 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).

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 National Forest 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.

The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. Tethered-assist logging is becoming a more economical, safe, and available method of yarding on steep slopes throughout the region.

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 the Region have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70 percent. We urge the District to consider allowing this equipment to be used where appropriate on the Dixie-Comstock Project to mitigate implementation obstacles. We are especially concerned about the economic viability of the 380 acres proposed for helicopter logging. Perhaps tethered logging could be an option for this area?

Finally, AFRC would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has limited operating time at best, and further reductions such as these only makes surviving in the logging business that much more difficult.

6. AFRC supports the District's proposal for shaded fuel breaks, and suggests that these fuel breaks extend 200 ft. from the center line of the road. We also suggest thinning to a density of 40 sq. ft. basal area per acres for fuels reduction and improved vigor on residual trees.
7. Regeneration harvests are critical to attaining forest health and fuels reduction objectives described in the purpose and need. The proposed action includes 3,191 acres of even-aged regeneration methods that would create 47 early seral seedling/sapling structure class (openings) that range in size from 2 to 790 acres and total 3,191 acres. Fourteen of these openings exceed 40 acres, ranging from 41 to 790 acres, and total 2,904 acres. AFRC supports the plan to create these 14 openings larger than 40 acres and supports the District's 60-day notice for comment on the larger openings.
8. AFRC supports management in both Inventoried Roadless Areas (IRA), and in the Roadless Expanse areas identified in the Project areas. These areas were identified using the 2019 Northern and Intermountain Region Guidance, and seven additional unroaded tracts were included for analysis as part of the broader Roadless Expanse, which encompasses both inventoried roadless areas and the unroaded lands contiguous to these IRA's, which are at least 100 acres and span at least ½ mile between existing roads. A total of 468 acres will be treated in the Gospel Hump IRA and 3,033 acres will be treated in Roadless Expanse areas. The commercial components of the work are outlined below.

Treatment Type	Unit Numbers	Acres Treated in Gospel Hump IRA	Acres Treated in Unroaded Tracts A-G	Total Acres Treated in Roadless Expanse
Mechanical Harvest - Regeneration & Commercial Thin Veg Treatment	5B, 7A, 7B, 7C, 18, 45B, 58A, 58B, 61, 85A	374	1795	2169
Aspen Regeneration-Veg Treatment	303A, 304, 306, 308, 309, 310, 311, 312, 313, 314A, 314B, 315B	67	93	160
Roadside Shaded Fuel Breaks Fuel Treatment	400	13	35	48

The 2008 Idaho Roadless Rule acknowledged a need for reducing the risk of wildland fire to at-risk-communities, by including a designation called “Community Protection Zones” (CPZ’s) within the Backcountry Restoration Theme. A CPZ is defined as an area extending ½ mile from the boundary of an At-Risk-Community, or an area within one and half miles of the boundary of an At-Risk-Community. Proposed actions specifically within the Gospel Hump IRA includes a combination of fuels reduction treatments, with all but 24 acres of proposed prescribed fire treatment occurring within the CPZ, to reduce the probability of adverse fire impacts to the community of Comstock. The proposed action will decrease the overabundance of trees in the 10-14.9-inch size class across all PVTs, moving the project area closer to desired conditions, while making no discernable change to the size classes greater than 15”. There is an underabundance of trees in the largest size classes (15-19.9” and 20+”) across all prescribed vegetation treatment areas largely due to the existing species composition.

9. Treatments in riparian areas are limited to aspen regeneration, roadside fuel breaks, and temporary road construction. Harvest activities, including openings over 40 acres, would not occur in RHCA's and therefore would not affect surface water temperatures. Riparian thinning is limited to treatments that reduce ladder fuels by removing smaller diameter trees.

AFRC is disappointed to see that no commercial treatments are planned for the riparian areas. We would like to remind the Forest 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. 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.

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.

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.

Dry Forests

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-tolerant 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.

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.

10. We agree with the EA’s assertion that “Continuing to manage forested areas as forests would maintain their long-term ability to sequester carbon project activities would be consistent with adaptation actions and strategies recommended for managing forests considering climate change.”

The Forest has also provided an informative 6-page climate change and carbon affects analysis in the planning document. One assertion in this analysis is that “*Timber management would allow for the short-term, localized reduction of carbon sequestration through the removal of living vegetation. Implementing proposed management activities, including desired vegetation conditions, would ensure that forest resiliency is promoted by these activities and, therefore, timber management would contribute to the long-term capacity of forests to sequester carbon.*” While timber harvest certainly removes living

vegetation from the forest, the assertion that doing so reduces carbon sequestration potential is oversimplified. The thinning treatments proposed in this Project would likely result in improved growth and vigor of residual trees. This improved growth and vigor would increase those trees' ability to sequester carbon.

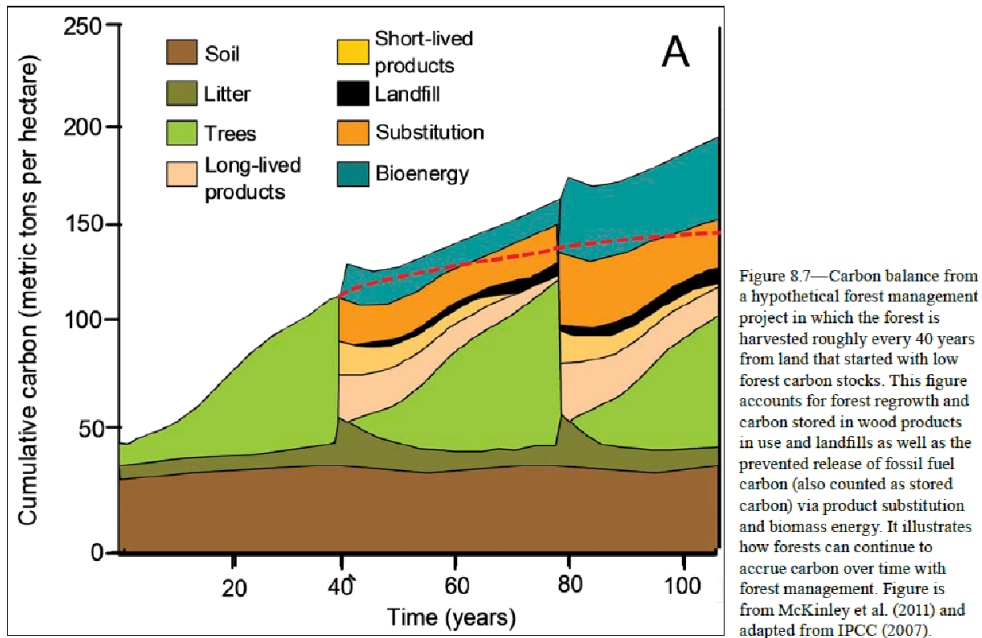
AFRC appreciates the detailed analysis on the Project's impacts to climate change, carbon sequestration, and greenhouse gas emissions. Interim CEQ regulations pertaining to the analysis of this resource have recently been updated and the Forest Service must conduct its analysis on this Project accordingly. 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.

We would like Forest to 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 Dixie-Comstock 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 appreciate that the Forest incorporated much of the literature we provided during scooping related to carbon and climate. Please consider a few additional relevant documents outlined below.

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 believes that 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 (Gustavasson 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.

Thank you for the opportunity to provide scoping/Draft EA comments for the Dixie-Comstock Community Protection Plan. We look forward to its rapid implementation.

Sincerely,

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

Tom Partin
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Portland, Oregon 97239