



VIA Link: <https://www.fs.usda.gov/project/?project=60853>

September 17, 2024

Benjamin Johnson, District Ranger
St. Joe Ranger District
222 South 7th Street, Ste. 1
St. Maries, ID 83861

Dear Mr. Johnson:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide Draft EA comments on the Lacy Lemoosh 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 Idaho Panhandle 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 proposed Lacy Lemoosh Project Area is approximately 16,116 acres in size, located in the southwest portion of the St. Joe Ranger District in Benewah and Latah Counties, Idaho. The southern border of the Project is adjacent to the Nez Perce-Clearwater National Forest and coordination has taken place to ensure the proposed action is consistent with shared resource objectives. The project site is within the Charlie Creek and Upper Santa Creek subwatersheds. AFRC and our members are very familiar with the project area and have travelled through the area and examined some of the stands of timber. In addition, AFRC provided scoping comments on May 9, 2023.

As AFRC stated in our scoping comments, we agree that active management in the area is needed. The location of the Project in respect to the Wildland Urban Interface also justifies treatment. The Forest has identified four Needs for Action that AFRC supports, those include:

- Improve forest health and resiliency to disturbances such as wildfire, drought, insects or diseases.
- Reduce hazardous fuels within the wildland urban interface (WUI) and other areas to lessen the severity of wildfires and to enable safe fire suppression efforts.
- Provide economic benefit to local communities through sustainable use of natural resources and benefits for local communities.
- Reduce sediment delivery to streams from forest routes to maintain or improve Total Maximum Daily Load (TMDL) related water quality concerns and recover degraded aquatic habitat for native species.

While AFRC supports the Project, we offer the following points that we believe will enhance and improve the analysis going forward.

1. AFRC is disappointed to see that the commercial treatment acres have been significantly reduced from scoping—see chart below:

Table 1. Approximated changes in activities in the Lacy Lemoosh Project Area. *

Treatment Type	Scoping Proposed Action	EA Proposed Action
Commercial Vegetation Treatment (Acres)	4,400	2,643
Commercial Vegetation Treatment (Units) **	185	139
Precommercial Thinning (Acres)	200	161
Fuel Breaks (Acres) ***	200	210
Prescribed Fire in Natural Fuels (Acres)	600	715
Total Acres of Vegetation Treatments	5,400	3,729

While we understand that these changes were made to more accurately account for riparian habitat conservation areas and to reduce treatment areas below 20%, the Equivalent Clearcut Area (ECA) model threshold for maintaining scientifically significant measurable change in water yield, we would like the District to analyze if more acres could be commercially treated if they reduced the acres of clearcutting and increased the acres of partial cutting thus improving the ECA factor? As it stands now only 16.4 percent of the project area will be commercially treated. With the reductions in acres covered, the commercial timber to be harvested and the merchantable volume will drop from 85 mmbf in the scoping document to slightly over 60 mmbf.

As we pointed out in our scoping comments, the majority of the NFS lands in the project area are considered suitable for timber production, which has the potential to provide economic benefits through sustainable use of natural resources and benefits for local communities. Maximizing treatment acres will also result in additional harvest of commercial volume. This will generate more K-V funds or retained receipts that can be directed to additional restoration service work and more sawlog volume that is needed by the local sawmills. The National Forests in Idaho are very important for providing the raw materials that local sawmills need to operate. 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. Specifically, studies in Idaho have shown that 18 direct and indirect jobs are created for every one million board feet of timber harvested. Without this material, our members would 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.

2. AFRC supports the even-aged regeneration harvests proposed in areas where forest health issues are prevalent. This is particularly pertinent in root rot areas. Even-aged treatments include clearcutting, seed-tree, or shelterwood methods. With the mixture of stand ages, species, and conditions, these will be the most appropriate tools to treat the forest. Less than 20 percent of the project area is occupied by shade-intolerant species dominance groups. This represents a severe lack of shade-intolerant dominance groups within the project area. Trending the forest composition towards the desired ranges outlined in the forest plan would increase resistance and resiliency, reducing the effects from drought, fire, insects, disease, and climate change. The goal is to retain or replant fire resistant species such as western white pine, western larch, or ponderosa pine.

Some of the uneven-aged treatments needed to address the forest health crisis in the area may require harvest areas larger than 40 acres. There is an abundance of two highly susceptible hosts of Armillaria root disease, Douglas-fir, and grand fir. Due to the extent of declining forest health and existing fire hazard in the project area, there are 22 proposed openings greater than 40 acres. As part of the project planning, the Forest Supervisor will seek Regional Forester approval for even-aged regeneration openings that exceed 40 acres. A 60-day public notification is initiated through this project scoping letter and a legal notice in the Coeur d'Alene Press. AFRC would like to go on record as supporting the request to create openings larger than 40 acres to address the forest health crisis.

3. The Forest has opted not to treat any of the 400 acres identified as old growth within the project area. However, 530 feet of temporary roads within existing old growth areas will be built. AFRC supports this to gain access to some of the units.
4. Table 2 below shows the projected logging systems by acres. While we are pleased to see that some tethered logging acres have been added from scoping, we ask the District for more flexibility. We would like the District to recognize that one of the primary issues affecting the ability of our members to feasibly deliver logs to their mills is 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 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 Idaho Panhandle market area with a variety of skills and equipment. Developing this EA 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 feller-bunchers 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. Please prepare your NEPA analysis documents in a manner that will facilitate flexibility in the use of various types of equipment. AFRC believes that with some of the lighter touch logging methods as mentioned above, the impacts could even be less than those analyzed.

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.

Table 2. Proposed Logging Systems*.

Logging System	Scoping Acres	EA Acres
Ground Based	1,275	929
Off-Road Skyline Yarder	1,275	544
Skyline	1,850	1,157
Tethered	0	13

- Road decommissioning is proposed for about 25 miles in the project area; 4 miles are proposed decommissioning from existing system roads; and 21 miles are proposed decommissioning from non-system roads.

We 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 in the general timber designated lands. 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 forest plan directs the Idaho Panhandle to manage the land base covered in the Lacy Lamoosh Project for a variety of objectives, including timber management, hazardous fuels reduction, and forest health. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us. Roads proposed for decommissioning should be assessed to determine if objectives could be met instead by road closure using barriers or blockage of the road entrances. AFRC does not support obliteration or recontouring roads that are to be decommissioned because of the high cost involved. The project is already very uneconomical.

Furthermore, there are alternative methods to mitigating potential resource damage caused by poorly designed or poorly maintained roads aside from full decommissioning. Removing or replacing ineffective culverts, installing waterbars, and blocking access are all activities that can mitigate resource damage while maintaining useful roads on the landscape for future use. Please consider these methods as an alternative to full decommissioning.

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 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.

If the Forest Service proposes to decommission, abandon, or obliterate road segments from the Lacy Lamoosh Project area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will enable firefighters to have quicker and safer access to suppress any fires that are ignited.

We would like the District to carefully consider the following three factors when deciding to decommission any road in the project area:

- Determination of any potential resource risk related to a road segment.
- Determination of the access value provided by a road segment.
- 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.

6. AFRC presented research and literature on carbon and greenhouse gases in our scoping letter. We are pleased to review the EA and supporting specialist report on carbon and greenhouse gas effects and see that some of our material is referenced. We are pleased to see that the information provided in the tables below shows the time it takes to recover emitted carbon from this Project is .9 months and for the Forest overall looking at all management projects it will take 9.3 months. We believe this is a good approach to analyzing this element of the Project.

Table 2. Estimates of carbon transfers and maximum substitution potential based on analysis using the Entity Guidelines tool.

	Alternative 1 No Action	Alternative 2 Proposed Action	Other planned harvests
All in tonnes CO ₂ eq			
Project-level biogenic carbon transfers			
Total harvest transfer	0	275,649	3,088,446
Carbon storage, HWP in use/in landfill, year 100	0	-89,378	-1,070,173
Cumulative net harvest emissions, project timeline	0	186,270	2,018,273
Maximum substitution potential			
Products	0	-149,707	-1,792,515
Bioenergy (fuelwood)	0	-6,366	-76,218
Total	0	-156,072	-1,868,733

Based on the simplified assumption that all harvests occur simultaneously and using the estimated rate of net forest carbon uptake from the carbon dashboard, the IPNF would sequester the amount of carbon emitted by the harvesting alternative within 0.9 months (Table 3). Proposed harvests remove less than 0.06 percent of aboveground IPNF carbon, and less than 0.02 percent of total IPNF carbon (Table 3).

Table 3. Calculations to contextualize the impacts of harvest actions on unit-level carbon stocks. Time to recover emitted carbon makes the simplifying assumption that all harvests occur simultaneously.

Metric	Units	Alternative 1 No Action	Alternative 2 Proposed Action	Other planned harvests
Time until net growth recovers emitted carbon	Months	0	0.9	9.3

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AFRC would like the Forest to consider implementing shaded fuel breaks along some of the major ingress and egress roads to meet the project's objective of WUI protection. These shaded fuel breaks should extend to at least 200 feet on each side of the road for not only fuel breaks, but also to improve forest health. This would further comply with the Purpose and Need for the Project which is to reduce

hazardous fuels within the WUI and other areas to lessen the severity of wildfires and to enable safe fire suppression efforts.

7. The silvicultural treatments to improve forest health and reduce hazardous fuels would also support the local elk herd found in Elk Management Unit 6-8. Proposed treatments would improve elk forage opportunities in the project area and benefit local elk populations. Additionally, proposed treatments will improve forage opportunities for other big game species throughout the project area. AFRC views this work as a real win/win.
8. AFRC requests that the District incorporate flexibility in the merchantability standards. There is going to be significant rot in the butts of the grand fir, hemlock and Douglas-fir. Purchasers will be challenged not only with the rot but also with utilizing a preferred log length out of the material. Therefore, we ask that the top size be flexible to accommodate rot and preferred log length issues. Ultimately, purchasers will maximize the recovery of merchantable material—added flexibility into the utilization specifications will reduce the risk level to purchaser while not hindering this level of recovery.
9. AFRC believes the District completed a quality economic analysis on the Project showing that revenue is positive.

Table 2. Project Feasibility and Financial Efficiency Summary (2019 dollars)

Category	Measure	Proposed Action
Timber Harvest Information	Acres Harvested	2,643
Timber Harvest Information	Sawtimber Volume Harvested (CCF)	122,971
Timber Harvest Information	Base Rates (\$/CCF)	17.00
Timber Harvest Information	Appraised Stumpage Rate (\$/CCF)	44.00
Timber Harvest Information	Predicted High Bid (\$/CCF)	50.00
Timber Harvest Information	Total Revenue (Thousands of \$)	6,159
Timber Harvest & Required Design Features	Present net value (\$Thousands)	1,681
Timber Harvest & All Other Planned Non-Timber Activities	Present net value (\$Thousands)	797

With the timber generating over \$6 million in revenues, this should allow enough money for needed K-V projects such as commercial thinnings and planting fire-resistant trees such as white pine, western larch, and ponderosa pine.

Thank you for the opportunity to provide Draft EA comments on the Lacy Lamoosh Project on the St. Joe Ranger District. While we are disappointed that this Project has been scaled back in size, it is still a good Project and needs to be implemented quickly.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Tom Partin
AFRC Consultant
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Portland, Oregon 97239