



VIA Email: comments-northern-idpanhandle-stjoe@fs.fed.us

October 17, 2018

St. Joe Ranger District Planning Staff
Attn: Steve Selser
St. Joe Ranger District
Idaho Panhandle National Forest
222 South 7th St, Suite 1
St. Maries, ID 83861

Dear Steve:

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

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 St. Joe Ranger District is designing a vegetation and hazardous fuels management project located primarily within the Emerald Creek drainage. The project area is located within Latah County, but extends slightly into Shoshone County West of Clarkia, Idaho. The Emerald Project will be carried out in accordance with Title VI, section 602 (d). This HFRA section provides for expedited NEPA reviews, pre-decisional objection review, and guidance on judicial review.

AFRC supports the Purpose and Need for this project which includes:

- Improvement of forest health and increased vegetation resilience through vegetation treatments including: regeneration timber harvest with associated road construction and tree planting, individual tree removal operations within the Emerald Creek Campground.
- Fuel reduction treatments in and around the Wildland Urban Interface (WUI) and prescribed burning within harvest units.
- Roads management and watershed improvement.
- Contributing to local economies by providing forest products and employment.

While AFRC supports the project, we offer these comments which we think might make the project better.

1. AFRC supports the Emerald Project being carried out in accordance with Title VI, section 602 (d) of the 2014 Farm Bill. We think this project area as described will address the insect and disease threats that weakens the forests in the project area and which increases the risk of forest fire. However, we encourage the Forest to do stand exams over the entire project area to get a better perspective of what all needs to be treated. At this point the St. Joe Ranger District has only conducted a coarse scale analysis of the existing forest conditions in the project area and have identified about 4,330 acres of the 21,627 acre project area (20%) that would benefit from vegetative restoration treatments. AFRC believes the Forest should look at all opportunities to treat the stands instead of just the 20% that you have initially identified. Treating more acres will better meet the purpose and need for this project including contributing more to local economies by providing forest products and employment.

The National Forests in Idaho are very important for providing the raw materials that sawmills within the State 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 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.”

2. AFRC strongly supports the proposed regeneration treatments in the timber harvest units. There is a need to regenerate portions or all of the stands of essentially pure Douglas-fir and grand fir due to the prevalence of root disease. Further as stated in the scoping document “An intermediate harvest would exacerbate root disease effects (through buildup in the stumps and root systems of the pathogens that cause root disease), lead to heavy blowdown, and encourage advanced regeneration of grand fir and Douglas-fir.” Regeneration harvest is also an integral component of a vegetation management program that strives to ensure a sustainable supply of timber products. Our members depend not only on a near-term supply of timber but also on the understanding that that supply will be available in the long-term. AFRC has voiced our concerns in the past regarding the sustainability of a vegetation management paradigm comprised exclusively of thinning and have repeatedly stressed the importance of incorporating a regeneration component into this paradigm. We urge the St. Joe Ranger District to consider incorporating the objective of sustained-yield timber management into the project’s purpose & need

statement to capture this important aspect of your management plan and the Forest Service's overall mission.

AFRC also supports the Forest's findings that there is a need to increase the size and scale of treatment areas to better match the size and scale of the insect and disease present within these stands. This would result in openings larger than 40 acres in many of the proposed harvest units. AFRC supports a forest plan amendment requesting the use of openings larger than 40 acres.

These larger openings will also help to trend this area towards the vegetative desired conditions providing a mosaic of age classes. Hardwood, shrub, and grass species are important sources of high-quality forage for deer and elk as they prepare for winter, over winter, and in the spring as they begin to replenish lost body mass from the previous winter. This proposal would retain and enhance aspen and provide valuable forage by reinvigorating existing shrub and grass communities making them more palatable and nutritious for big game species and other terrestrial wildlife.

3. AFRC believes more work could be done in the WUI. The Forest is proposing a fuels treatment unit along the eastern boundary of the project area because a local landowner had concerns regarding fuel buildup on National Forest Lands adjacent to his property. The work will only include reducing the surface fuels through grapple piling and burning, mastication, or using prescribed fire and underburning on around 101 acres. AFRC believes the Forest should take this opportunity to do a commercial harvest next to all adjacent landowners to reduce the risk of insect and disease and catastrophic wildfire getting onto those adjacent lands from the National Forest.
4. AFRC supports the transportation plan to facilitate the proposed timber harvest. This includes approximately 13 miles of temporary road and five miles of new system road. AFRC supports storing the new system roads by blocking or other means which will allow them to be used again. However, we do not support the carte blanche obliteration of the 13 miles of temporary roads that will be constructed. Rather, AFRC would like the Forest to look at each road segment separately and evaluate those based on future need for access for logging, fire, and recreation.

The Emerald Project area is in Elk Management Units 6-8 and 6-9, which are identified in the forest plan as medium priority elk management units, and management activities in elk management units should maintain existing levels of elk security and where possible, management activities in high and medium priority elk management units should improve elk security. To offset the loss of elk security habitat the Forest is identifying opportunities to maintain elk security through road closures. The closures would be accomplished by installing gates on each route so that they would be available for administrative use or closed seasonally, depending on specific road requirements. Again, AFRC favors road closures during big game hunting seasons rather than road obliteration.

5. AFRC believes that DXP could be an effective tool in this project. The current species composition is dominated by grand fir, Douglas-fir, western hemlock and lodgepole pine. A desired condition for the IPNF Forest Plan is to have more forest dominated by western white pine, ponderosa pine, and western larch. This change in stand composition does not reflect the desired condition of the forest and has made these stands more susceptible to disease and disease related mortality. AFRC believes a DXP prescription could be used over a large part of the treatment area to achieve the desired species composition and be a cheaper method for designating harvest trees.

In closing, AFRC would like to commend the Forest for utilizing Title VI, section 602 (d) of the 2014 Farm Bill to expedite treatment on this project area. However, we strongly encourage the Forest to analyze all possible acres for treatment using stand exams or other methods to fully ascertain all acres that need treatment. The Region has been tasked with ramping up their annual timber targets and one way of achieving this is to treat a maximum number of acres within each project that is analyzed.

Thank you for the opportunity to provide comments on the Emerald Project scoping. I look forward to following the implementation of this project as it moves forward.

Sincerely,

A handwritten signature in cursive script that reads "Tom Partin". The signature is written in dark ink and is positioned below the word "Sincerely,".

Tom Partin
AFRC Consultant
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