



VIA EMAIL

May 22, 2017

Thomas L. Tidwell  
United States Forest Service Chief  
1400 Independence Avenue, SW  
Washington, D.C. 20250-0003

Re: North Pioneer Fire Salvage and Restoration Project - Emergency Situation Determination

Dear Chief Tidwell:

The Boise National Forest has requested an Emergency Situation Determination (ESD), 36 C.F.R. § 218.21, for the North Pioneer Fire Salvage and Restoration Project (North Pioneer Project) located on the Lowman Ranger. The American Forest Resource Council (AFRC) writes to support the issuance of an ESD because (1) the burned or dead trees constitute a hazard to human health and safety; and (2) any delay in implementing the project would allow the trees to deteriorate, causing an estimated loss in value of \$2,731,853, which would jeopardize the Forest Service's ability to accomplish project objectives related to resource protection and restoration. Approving an ESD would allow implementation of the North Pioneer Project to occur immediately after the decision notice is signed and before a significant amount of the economic value of the dead or dying trees is lost.

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 Boise 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 logging and milling infrastructure in southern Idaho is very fragile. Providing wood supply from these projects is important to ensure continued viability of the infrastructure which the Forest Service needs to support its restoration goals throughout the region.

The Pioneer Fire started on July 18, 2016 and was officially declared out six months later on January 24, 2017. The hot temperatures, intense winds, and dry conditions allowed the Pioneer Fire to burn a total of 190,000 acres, of which 47% of the total fire area, and 58% of the North Pioneer Project area burned at high severity. The purpose of the project is to remove

hazard trees affecting public health and safety along roads and trails and within developed sites, restore portions of the landscaped burned by the fire through reforestation, and recover forest economic value and benefits through salvage sale.

Immediate implementation of the North Pioneer Project is critical to mitigate the risk of hazard trees along roads and trails that are open to the public and within developed sites. The fire created large patches where no live forest canopy remains and salvage of those dead or hazard trees within the high-mortality areas needs to occur. If the hazard trees are left in place, then those trees pose a risk of striking vehicles, recreationalists, and Forest Service personnel, or blocking roads or trails. Within a 200-foot safety buffer along both sides of the 211 miles of open National Forest System (NFS) roads and 79 miles of open motorized and non-motorized NFS trails, the project proposes to harvest 5,213 acres of hazard trees. If an ESD is not issued, then the Forest Service would have to close those roads and trails because it does not have the funds or resources set aside to remove the danger trees. The projected cost to treat roadside hazards is expected to be \$622,000 for open roads and \$49,200 for trails.

An ESD is vital for the Forest Service to remove the hazard trees and recover enough commodity value to market the trees. When post-fire timber harvest is involved, the timeline to implement a project should occur during the normal operating season the year following the emergency event to recover the wood products value and accomplish a project's needs. In this case, a June/July 2017 timber sale is imperative to address the July 2016 fire event and maintain the highest value possible of the affected raw materials. Through salvage treatment, the net recovery for the project is estimated to be 32.4 MMBF of sawtimber and net positive receipts to the government of \$2,731,853, which could fund restoration activities and generate 728 jobs. Without an ESD, the Forest Service predicts a significant loss of timber volume and value, e.g., loss of 43% of product value for the North Pioneer Project. The anticipated cost to treat the road and trail hazards, decommission unauthorized travel ways, and performed restoration work is estimated at \$2,995,050. The Forest Service's ability to acquire additional funds, without a timber sale, is speculative at best.

AFRC member companies count on the Boise National Forest to provide a steady supply of wood to keep their mills running and workers busy. The three proposed post-fire sales significantly contribute to Region 4's timber program for Fiscal Year (FY) 2017. Approximately 68% of Region 4's program will be offered in 4<sup>th</sup> quarter of FY17, with a majority of that volume associated with the twelve post-fire sales for the Pioneer Project (both North and South). Without the Pioneer Project, there would be a significant gap in the wood market for this region. Given the fragile state of both the logging and milling infrastructure in southern Idaho, it is imperative that these raw materials do not lose their economic value through deterioration by insect and fungi infestation.

The use of an ESD is a valuable tool for the Forest Service and has recently been upheld by an Idaho federal judge for the Tower and Grizzly Projects on the Idaho Panhandle National Forest. *Alliance for Wild Rockies v. Farnsworth*, No. 2:16-cv-433-BLM (D. Idaho May 5, 2017). The Tower and Grizzly Projects sought to remove danger trees along 79 miles of road, 8 miles of hiking trails, and 17 miles of snowmobile trails in the burned area. Like with the Pioneer Project, the Forest Service anticipated that without an ESD there would be a significant

Chief Tidwell

Page 3 of 3

loss in revenue, \$2.8 million for the Tower Project and \$927,911 for the Grizzly Project, and an inability to fund restoration work. Taking into account the need to act quickly to preserve the economic value of the burnt timber, the district court affirmed the Chief's ESD determination for both projects: "[S]mall projects, fully vetted and properly designated to mitigate impacts, may be valuable in reducing hazards and funding restoration efforts. The Tower and Grizzly Projects fit that mold."

We strongly support the issuance of an ESD for the North Pioneer Project to reduce hazard trees along roads and trails and, at the same time, recover enough commodity value to fund restoration work in the areas that have been devastated by high intensity fire. The post-fire timber sales can help the economic condition of the timber industry and rural communities reliant on the Boise National Forest. Thank you for this opportunity to provide our perspective of the importance of an ESD for this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style.

Travis Joseph  
President

cc: Dan Jiron, Associate Chief  
Cecilia Seesholtz, Forest Supervisor  
John Kidd, District Ranger



VIA EMAIL

May 22, 2017

Thomas L. Tidwell  
United States Forest Service Chief  
1400 Independence Avenue, SW  
Washington, D.C. 20250-0003

Re: South Pioneer Fire Salvage and Restoration Project - Emergency Situation Determination

Dear Chief Tidwell:

The Boise National Forest has requested an Emergency Situation Determination (ESD), 36 C.F.R. § 218.21, for the South Pioneer Fire Salvage and Reforestation Project (South Pioneer Project) located on the Idaho City Ranger District. The American Forest Resource Council (AFRC) writes to support the issuance of an ESD because (1) the burned or dead trees constitute a hazard to human health and safety; and (2) any delay in implementing the project would allow the trees to deteriorate, causing an estimated loss in value of \$3,800,521, which would jeopardize the Forest Service's ability to accomplish project objectives related to resource protection and restoration. Approving an ESD would allow implementation of the project to occur immediately after the decision notice is signed and before a significant amount of the economic value of the dead or dying trees is lost.

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 Boise 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 logging and milling infrastructure in southern Idaho is very fragile. Providing wood supply from these projects is important to ensure continued viability of the infrastructure which the Forest Service needs to support its restoration goals throughout the region.

The Pioneer Fire started on July 18, 2016 and was officially declared out six months later on January 24, 2017. The hot temperatures, intense winds, and dry conditions allowed the Pioneer Fire to burn a total of 190,000 acres, of which 47% of the total fire area, and 47% of the South Pioneer Project area burned at high severity. The purpose of the project is to remove

hazard trees affecting public health and safety along roads and trails and within developed sites, restore portions of the landscaped burned by the fire through reforestation, and recover forest economic value and benefits through salvage sale.

Immediate implementation of the South Pioneer Project is critical to mitigate the risk of hazard trees along roads and trails that are open to the public and within developed sites. The fire created large patches where no live forest canopy remains and salvage of those dead or hazard trees within the high-mortality areas needs to occur. If the hazard trees are left in place, then those trees pose a risk of striking vehicles, recreationalists, and Forest Service personnel, or blocking roads or trails. Within a 200-foot safety buffer along both sides of the 211 miles of open National Forest System (NFS) roads and 79 miles of open motorized and non-motorized NFS trails, the project proposes to harvest 11,818 acres of hazard trees. If an ESD is not issued, then the Forest Service would have to close those roads and trails because it does not have the funds or resources set aside to remove the danger trees. The projected cost to treat roadside hazards is expected to be \$772,652 for open roads and \$267,084 for trails.

An ESD is vital for the Forest Service to remove the hazard trees and recover enough commodity value to market the trees. When post-fire timber harvest is involved, the timeline to implement a project should occur during the normal operating season the year following the emergency event to recover the wood products value and accomplish a project's needs. In this case, a June/July 2017 timber sale is imperative to address the July 2016 fire event and maintain the highest value possible of the affected raw materials. Through salvage treatment, the net recovery for the project is estimated to be 36.9 MMBF of sawtimber and net positive receipts to the government of \$3,800,521, which could fund restoration activities and create 886 of private sector jobs. Without an ESD, the Forest Service predicts a significant loss of timber volume and value. The anticipated cost to treat the road and trail hazards, decommission unauthorized travel ways, and perform restoration work is estimated at \$5,682,836. The Forest Service's ability to acquire additional funds, without a timber sale, is speculative at best.

AFRC member companies count on the Boise National Forest to provide a steady supply of wood to keep their mills running and workers busy. The three proposed post-fire sales significantly contribute to Region 4's timber program for Fiscal Year (FY) 2017. Approximately 68% of Region 4's program will be offered in 4<sup>th</sup> quarter of FY17, with a majority of that volume associated with the twelve post-fire sales for the Pioneer Project (both North and South). Without the Pioneer Project, there would be a significant gap in the wood market for this region. Given the fragile state of both the logging and milling infrastructure in southern Idaho, it is imperative that these raw materials do not lose their economic value through deterioration by insect and fungi infestation.

The use of an ESD is a valuable tool for the Forest Service and has recently been upheld by an Idaho federal judge for the Tower and Grizzly Projects on the Idaho Panhandle National Forest. *Alliance for Wild Rockies v. Farnsworth*, No. 2:16-cv-433-BLM (D. Idaho May 5, 2017). The Tower and Grizzly Projects sought to remove danger trees along 79 miles of road, 8 miles of hiking trails, and 17 miles of snowmobile trails in the burned area. Like with the Pioneer Project, the Forest Service anticipated that without an ESD there would be a significant loss in revenue, \$2.8 million for the Tower Project and \$927,911 for the Grizzly Project, and an

inability to fund restoration work. Taking into account the need to act quickly to preserve the economic value of the burnt timber, the district court affirmed the Chief's ESD determination for both projects: "[S]mall projects, fully vetted and properly designated to mitigate impacts, may be valuable in reducing hazards and funding restoration efforts. The Tower and Grizzly Projects fit that mold."

We strongly support the issuance of an ESD for the South Pioneer Project to reduce hazard trees along roads and trails and, at the same time, recover enough commodity value to fund restoration in the areas that have been devastated by high intensity fire. The post-fire timber sales can help the economic condition of the timber industry and rural communities reliant on the Boise National Forest. Thank you for this opportunity to provide our perspective of the importance of an ESD for this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style.

Travis Joseph  
President

cc: Dan Jiron, Associate Chief  
Cecilia Seesholtz, Forest Supervisor  
Brant Petersen, District Ranger