Via: https://cara.ecosystem-management.org/Public//CommentInput?Project=55109

December 27, 2018

Keith Lannom, Forest Supervisor
Payette National Forest
500 N. Mission Street, Building 2
McCall, Idaho 83638

Dear Keith:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Mesa Fire Salvage (Mesa).

The American Forest Resource Council (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. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Payette National Forest, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Idaho forest sector employs many Idahoans, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector.

AFRC is glad to see the Payette proposing fire salvage on the Mesa Fire area. The categorical exclusion (CE) being utilized allows for up to 250 acres to be salvaged. AFRC is pleased to see that the Payette is utilizing our recommendations from the field trip on November 8 to the Mesa Fire area. AFRC fully supports Purpose and Need: "The purpose of the Mesa Fire Salvage and Reforestation Project is to produce merchantable timber products from trees killed during the wildfire and reestablish forest vegetation in areas where salvage harvest occurs. The need for the project is to harvest trees killed during the fire before they lose market value and help support the economic viability of the local communities."

AFRC supports salvage harvest operations proposed on 236 acres using ground based logging systems including 20 acres of harvest within the outer half of Riparian Conservation Areas (RCAs) under winter logging conditions with two short temporary jump-up roads. As we

discussed on November 8, the timely removal of the burned timber, especially the ponderosa pine in Cottonwood Creek, is critical.

Logging contractors must average 10 months of work per year in order to be profitable. Developing the Mesa proposal with that in mind is critical. AFRC advocates allowing as much flexibility as possible within the contract while still meeting the management goals and guidelines contained in the NEPA document. This flexibility allows the purchaser to use the most economically viable systems thus the ability to pay higher stumpage rates. Placing restrictions on the specific machinery to be used severely impacts the economic viability of the timber sale while not improving the end result. Descriptions should be limited to "ground based" or "cable" with a description of the objectives and outcomes desired. Locking in the specific type of logging system in the NEPA document removes flexibility during the implementation stage. Contractual design and packaging on Mesa should be as flexible as possible. It is critical that industry be allowed to develop and provide plans to suitably meet objectives and implement projects to make them more cost effective.

Fires release copious amounts of carbon dioxide (CO2) into the atmosphere. When trees are salvaged from these fires and re-planted, the ecosystems begin to recover and sequester those gases back into the new trees and wood fibers. It is vital these areas are salvaged and replanted in order to start this process as soon as possible. Without salvage logging and re-planting, fire scars can become desolate, void of all signs of a forested ecosystem. Fires deforest landscapes when management does not follow them.

Thank you for the opportunity to provide scoping comments on the Mesa Fire Salvage project. I look forward to the release of the CE and the implementation of this project as it moves forward.

Sincerely,

Irene K. Jerome

Irene K. Jerome
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