April 20, 2020

Zach Peterson, Forest Planner
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903 3rd Street
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Dear Zach:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Draft Revised Nez Perce-Clearwater Forest Plan (Draft Plan) and the Draft Environmental Impact Statement (DEIS).

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. AFRC members including Idaho Forest Group, Stimson Lumber, Boise Cascade, Columbia Cedar, and Vaagen Brothers Lumber rely on wood from the Nez Perce-Clearwater National Forest either directly or indirectly.

The purpose of the action is to revise the 1987 forest plan for the Nez Perce-Clearwater National Forest (Nez-Clear), which encompasses approximately 4.075 million acres. The Nez-Clear is located in the heart of north-central Idaho spreading across seven counties—Idaho, Clearwater, Latah, Shoshone, Benewah, Lewis, and Nez Perce. The plan area also encompasses six ranger districts: Palouse, North Fork, Lochsa and Powell, Moose Creek, Salmon River, and Red River.

AFRC members have been participating in the Plan revision process since July 2014 with the publication of the scoping notice. Since AFRC staff only started tracking the Nez-Clear's program of work since 2018, the comments below will be our only formal comments to the Plan.

AFRC's comments will focus on several major areas where we believe the Draft Plan or DEIS is most important to our membership, as well as the surrounding communities and counties that are impacted by management decisions made by the Nez-Clear.

Pertinent Background

As mentioned earlier, the existing plans for the Nez Perce and Clearwater National Forests were completed in 1987 and have been amended many times. The two Forests were administratively combined in 2013, and the Idaho Roadless Rule made management decisions that affected approximately 1.5 million acres of the Nez-Clear. Revised Forest Service policies, congressional direction, court decisions, new or updated conservation agreements and recovery plans, and new scientific findings have all highlighted that the current plans are outdated and need to be revised. Further, there is a need to revise the 1987 land management plans into a single revised land management plan based on the Need for Change identified in the proposed action, including:

- Administrative Consolidation and Age of Current Plans
- Integrated Restoration
- Ecological, Social, and Economic Sustainability
- Updates Related to Other Law, Regulation, or Policy
- State and Local Land Management Plans
- Best Available Scientific Information

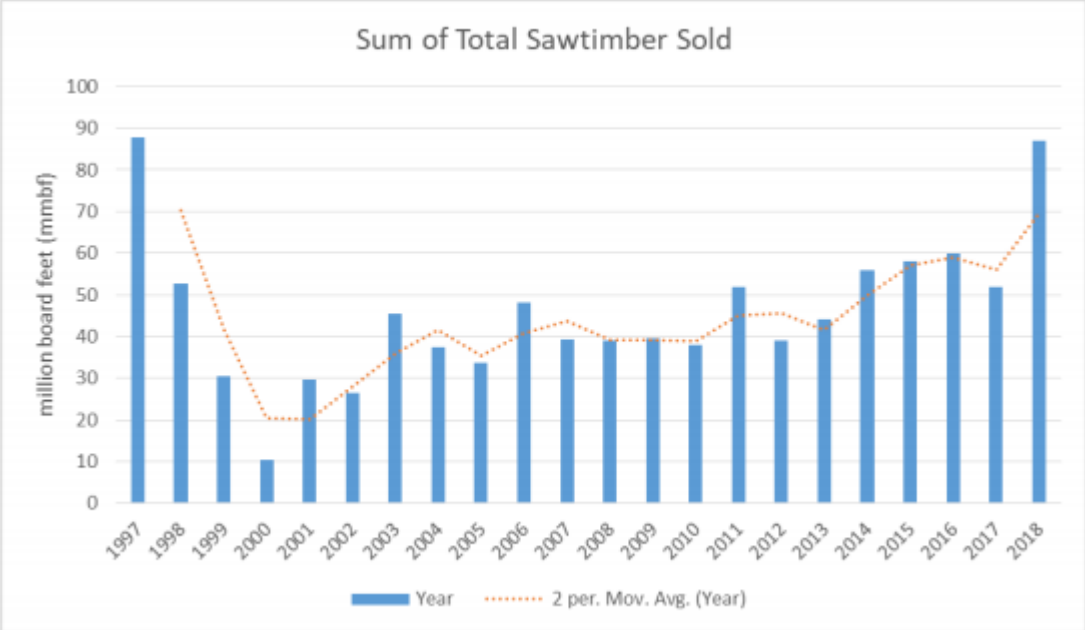
The Nez-Clear identified the following significant issues during scoping based on the scoping document entitled "Proposed Action."

- Issue 1 - Recommended Wilderness and Wild and Scenic Rivers: The Proposed Action may not adequately apportion recommended wilderness areas across the Nez-Clear. The proposed action may not adequately apportion suitable Wild and Scenic River segments across the Nez-Clear.
- Issue 2 - Recreation and Access Management: The proposed action may not adequately apportion motorized and non-motorized recreation access opportunities in the front country (Management Area 3) and backcountry (Management Area 2) areas across the Nez-Clear.
- Issue 3 - Forest Vegetation: Desired conditions for forest vegetation should be met through natural processes or active management. The rate of progress towards the desired conditions should occur at a faster or slower pace. Desired conditions should include higher compositions of early seral species and increased or decreased patch sizes and increased or decreased tree densities to meet ecological habitat needs of wildlife species, maintain resiliency of forest vegetation communities, and meet the social needs of forest users at a local, regional, and national scale.
- Issue 4 - Timber: The Potential Timber Sale Quantity should be increased or decreased to better provide for a balance of ecological sustainability, economic, and social resiliency. The maximum regeneration harvest unit size should be increased or decreased. Significant issues represent unresolved conflict among available resources. Numerous other items that may not have been sufficient in the proposed action were identified through public comment. Those items helped guide the Nez-Clear as the forest plan revision team continued to develop plan components.

AFRC will focus most of our comments on the Forest Vegetation and Timber Issues identified in the Draft Plan and DEIS. However, these factors also impact other issues. Several significant factors have arisen on these Forests since the last Forest Plan that need to be assessed and should be considered as you develop the revised Forest Plan. These include the amount of wildfire that has occurred and the lack of vegetative management that has taken place on the Forest to move the Forest closer to the goal to be within the Historic Range of Variation (HRV).

- Between 1987 and 2017, approximately 53 percent of the Nez-Clear burned in wildfires. About 2.6 million acres burned in areas deemed suitable for timber production in the 1987 Forest Plan. Over this 30-year span of time, many of these acres experienced reburns. Where stand-replacing fires occurred, forests were returned to an early successional stage of development, and it could be at least 50 to 80 years before the trees reach a size where commercial harvest is feasible.
- The long-term sustained-yield capacity calculated for the 1987 Forest Plan was 210 million board feet (mmbf) for the proclaimed Nez Perce National Forest and 429 mmbf for the proclaimed Clearwater National Forest, for a total of 639 mmbf. The allowable sale quantity, as defined for the 1987 Forest Plan, is 108 mmbf on the Nez Perce National Forest and 267 mmbf on the Clearwater National Forest, for a total of 375 mmbf. The actual annual volume of timber products offered averaged 46 mmbf for the period 1997 through 2018. See chart below:

Figure 1. Timber product volume sold from the Nez Perce-Clearwater 1997-2018



To further illustrate the impacts of lack of management on Forest Service lands in recent years, data shows that approximately 39 percent, or 20.4 million acres, of Idaho's land is within the United States National Forest System. More than three-fourths of Idaho's timber resources are on federal lands, a total that does not include four million acres of federal forest lands in the National Wilderness Preservation System. In 1979, approximately 46 percent of timber harvest in Idaho was sourced from National Forest System Lands compared to 7 percent in 2006 (Brandt et al., 2012). Demand for timber remains strong in the multi-county plan area resulting in competitive bids for offered timber (Cook et

al., 2016). Competitive markets suggest the industry is capable of scaling up in the short term to meet increased national lumber demand, as long as the timber supply remains elastic. This drop in harvest levels has created a buildup of fuels which has been the precursor to the large number of acres burned as well as the demise of many forest products companies over the last three decades.

The Draft Plan has identified landscape-level needs such as fire resiliency and attaining the desired HRV in the various timber stands, as well as socio-economic needs that can only be met by increasing timber harvest across the landscape. A substantial increase in timber volume has broad support from diverse stakeholders such as the local collaborative, forest products industry, and local governments.

***AFRC ISSUE #1: Socioeconomics**

Timber Supply

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 future needs. Our members cannot make large capital investments in their facilities without assurance that a robust harvest level will continue. 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.

AFRC wants to ensure that socioeconomics is an important consideration for the decisionmaker as the plan revision progresses. As we discuss below, our members' ability to harvest and remove these timber products from the timber sales generated from the Plan is paramount. We would like the Forest Service to recognize the importance of economic viability and support to the local infrastructure by creating its own section in the purpose and need of the Draft Plan instead of being embedded with other desired outcomes. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service lands. As the Forest Service surely knows, the "restoration" treatments that are desired on these public lands cannot be implemented without a heathy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed

Regional Socioeconomics

AFRC believes the Plan revision must not only address timber needs, but also key socioeconomic needs within the Region. With that in mind, the following factors should be addressed.

The Nez Perce-Clearwater Forest Plan Assessment, Chapter 6.0, Socioeconomic Conditions and Trends report defines the analysis area as the five counties in north central Idaho that are adjacent to, or in the immediate vicinity of, the Nez-Clear. These five counties are Clearwater County, Idaho County, Latah County, Lewis County, and Nez Perce County. In addition to the primary economic analysis area identified in the assessment, this analysis also considers a secondary economic analysis

area. This combined area is made up of 11 counties, six of which receive federal land payments for having Nez-Clear lands within them. The counties in the secondary economic analysis area include: Benewah County, Idaho; Shoshone County, Idaho; Clearwater County, Idaho; Latah County, Idaho; Missoula County, Montana; Mineral County, Montana; Nez Perce County, Idaho; Lewis County, Idaho; Idaho County, Idaho; Ravalli County, Montana; and Adams County, Idaho. The importance of the timber industry to the local economy is illustrated in the two charts below. These relative values should be strongly considered when determining the appropriate harvest levels on the Forest as they relate to socioeconomics.

Table 3. Employment in the analysis area by resource and alternative (direct employment contribution, estimated number of jobs).

Resource	Current	NA	W	X	Y	Z
Recreation: all	251	251	251	251	251	251
Wildlife and Fish Recreation: all	91	91	91	91	91	91
Grazing	84	84	84	84	84	84
Timber	548	2,028	4,309	4,477	3,561	2,391
Minerals	0	0	0	0	0	0
Payments to States/Counties	93	93	93	93	93	93
Forest Service Expenditures	1,056	1,056	1,056	1,056	1,056	1,056
Forest Total	2,122	3,602	5,884	6,052	5,136	3,965
Percent Change	---	69.7%	177.2%	185.2%	142.0%	86.8%

Table 4. Labor Income in the analysis area by resource and alternative (average annual labor income, in thousands of 2016 U.S. dollars)

Resource	Current	NA	W	X	Y	Z
Recreation: all	$7,053	$7,053	$7,053	$7,053	$7,053	$7,053
Wildlife and Fish Recreation: all	$2,628	$2,628	$2,628	$2,628	$2,628	$2,628
Grazing	$2,122	$2,122	$2,122	$2,122	$2,122	$2,122
Timber	$23,206	$85,910	$182,591	$189,701	$150,877	$101,277
Minerals	$0	$0	$0	$0	$0	$0
Payments to States/Counties	$4,474	$4,476	$4,474	$4,475	$4,476	$4,476
Forest Service Expenditures	$44,023	$44,023	$44,023	$44,023	$44,023	$44,023
Forest Total	$83,507	$146,214	$242,892	$250,003	$211,179	$161,581
Percent Change	---	75.1%	190.9%	199.4%	152.9%	93.5%

In addition to the employment data, a survey of the general public in the secondary social analysis area indicates that 37 percent of residents believe that providing income to the timber industry is a very or extremely important purpose of their local, federal public lands (Bureau of Business and Economic Research, 2018). Public commenters also noted the importance of wood products to local businesses and communities. The harvesting and processing of timber provide jobs and are part of

the culture of the area. (University of Montana, 2019). In addition, county plans advocate for the protection of traditional economic structures, including timber, and promote multiple uses of natural resources. Idaho County advocates for vegetation treatments that improve forest health, reduce wildfire risk, and provide a sustainable flow of commodities. Idaho County also advocates for the harvesting of dead and dying trees to recover their economic value. Latah County advocates for sustainable harvest practices and notes that unsustainable harvesting and resource conflicts could affect the long-term viability of timber harvest in the county.

Even with the sharp decline of Forest Service timber sold during the past three decades, the milling infrastructure has remained somewhat stable in recent years as pointed out in the chart below.

Milling infrastructure within the plan area has remained relatively intact over the past decade. Bidding competition for timber sales and stewardship contracts has remained high. Similarly, the capacity for logging and restoration services exists at a level adequate to accomplish forest plan objectives. Capacity includes mills within and adjacent to the plan area, as shown in **Table 3**.

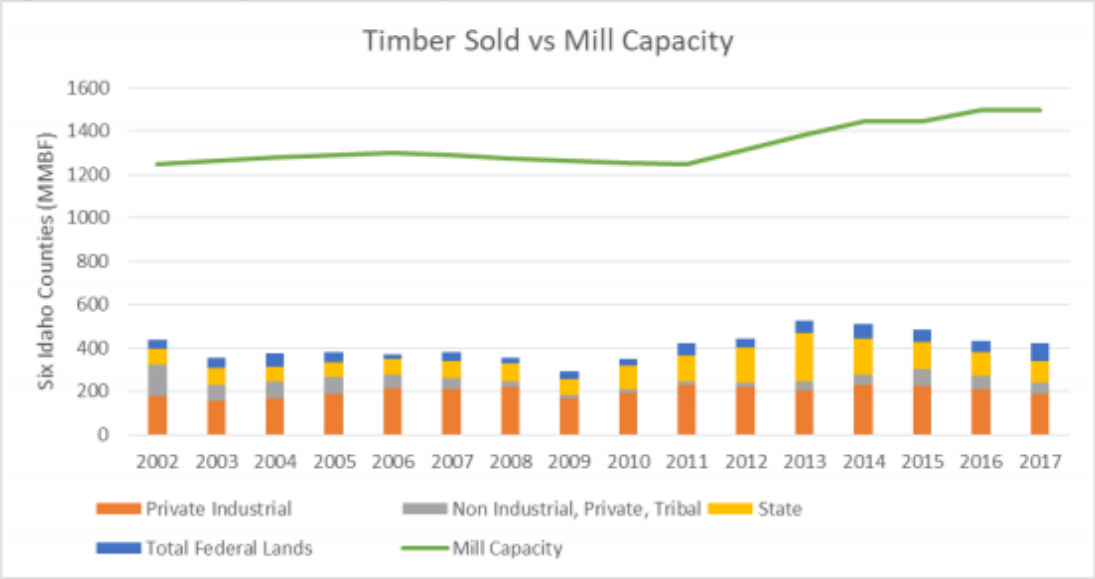
Table 3. Forest products mills and processing facilities within the multi-county area

County	Sawmills	Post and Pole Mill	Wood Chip Processing	Cedar Products	Pulp and Paper	Biomass, Bark, Fuel pellets
Idaho	2	1	0	1	0	1
Clearwater	2	0	0	1	0	0
Lewis	0	1	0	0	0	0
Nez Perce	0	1	0	0	0	1
Latah	1	1	1	1	1	1

Data Source: (Cook et al., 2016)

Collectively, the multi-county planning area has a vastly shrunken capacity from historic levels. Total timber capacity and harvest levels have declined since 1980 but have experienced a slight increase over the last five years as illustrated in Figure 4. Demand for timber remains strong in the multi-county planning area resulting in competitive bids for offered timber (Cook et al., 2016). A 2012 technical report completed for the Forest Service determined that "***consumption of wood products in the United States has risen in recent decades. U.S. lumber production is projected to increase through 2040"*** (Skog et al., 2012). Competitive markets suggest the industry is capable of scaling up in the short term to meet increased national lumber demand, as long as timber supply remains elastic. This increasing demand trend for timber is important in that it shows that there is more demand for local timber if made available.

Figure 4. Five County Timber Capacity and Harvest 2002-2015



Data Source: Bureau of Business and Economic Research, University of Montana, Idaho's Forest Products Industry and Timber Harvest, 2015

*AFRC ISSUE #2: Vegetation

There is a demand for additional timber from the Nez Perce-Clearwater National Forest as illustrated by the graphs and information above. AFRC typically encourages the Forest Service to treat as many appropriate acres as practical when preparing an EA or EIS. The same is true when doing a Forest Plan Revision, especially as designation of timber suitability or for other compatible uses does not guarantee eventual treatment. Treating more acres also increases the level of timber that will be provided. The National Forests in Idaho are very important for providing the raw materials that sawmills need to maintain their operations. 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. 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.

Factors Important for Choosing the Preferred Alternative

Stand Conditions

The Natural Range of Variation (NRV) analysis indicates a significant departure for species composition, forest structure and function compared to existing conditions. Plan components are designed to move forest composition, structure and function toward ranges calculated in the NRV analysis. Appropriate ranges for species composition, structure and function were estimated using NRV data calculated under a drier and warmer climatic scenario. Each alternative is designed to achieve desired conditions which are informed by the NRV analysis within the time frame specified for each alternative. Models indicate that desired conditions can be achieved.

Grand fir now dominates the majority of the forested area and early seral species are reduced from historic ranges and continue to decline. Grand fir, lodgepole, Engelmann spruce have all increased in composition. Ponderosa pine, western larch, western white pine and whitebark pine have all decreased in composition. Forest structure encompasses density, size class distribution and structural stages. (See Tables Below).

Table 53. Warm Dry potential vegetation type dominance types within Management Area 3 by alternative.

Dominance Type	Desired Range	No Action %		Alt. W %		Alt. X %		Alt. Y %		Alt Z %	
		20 Yrs.	50 Yrs.	20 Yrs.	50 Yrs.	20 Yrs.	50 Yrs.	20 Yrs.	50 Yrs.	20 Yrs.	50 Yrs.
Ponderosa pine	50-60%	23	21	25	23	25	23	24	22	24	23
Douglas fir	15-20%	6	10	6	10	6	10	6	9	6	9
Lodgepole pine	15-20%	15	17	15	16	15	17	15	18	16	16
Western larch	1-2%	.2	.4	.2	.2	.2	.2	.2	.3	.3	.4
Grand fir	2-10%	43	33	31	21	32	21	43	23	42	33

Table 2. Forestwide cover dominance types and associated broad potential vegetation type groups

	Broad Potential Vegetation Type			
Dominance Type	**Cold**	**Cool Moist**	**Warm Dry**	**Warm Moist**
Ponderosa pine	0%	0%	24.8%	1.1%
Douglas fir	3.8%	10.1%	30.6%	24.8%
Grand fir	0%	3.0%	32.8%	47.0%
Western larch	0.4%	0.2%	0.7%	1.3%
Western red cedar	0%	0%	0%	16.5%
Mountain hemlock	10%	4.3%	0%	0.1%
Western white pine	0%	0%	0%	0.7%
Lodgepole pine	42.7%	20.9%	14.5%	3.5%
Engelmann spruce	6.2%	26.1%	1.8%	3.5%
Subalpine fir	38.5%	34.9%	0.7%	1.1%
Whitebark pine	0.1%	0.6%	0%	0%

Attainment of desired conditions for the primary seral species of whitebark pine, western white pine, western larch and ponderosa pine will require a restoration strategy that focuses not only on retaining these species where they occur but increasing species composition through harvests that remove shade tolerant species followed by artificial regeneration. This process requires time to produce results, with an expected 70 to 100 years to achieve desired conditions under the proposed management strategies specific to each alternative. The consequences of not achieving desired conditions for dominance types

is the continued dominance of grand fir, Douglas fir, lodgepole pine, and subalpine fir / Engelmann spruce. These species are most susceptible to mortality from root diseases, insects, and fire. Ultimately, the forest will not be as resilient to disturbance events until seral species dominance can be reestablished.

Patch Size
Modeling suggests that the plan components will help move the average patch size upward towards NRV ranges. Root disease, spruce budworm, and Douglas-fir tussock moth, and hemlock looper in grand fir, Douglas-fir, and other species has increased due to an increase in species presence. Mountain pine beetle activity has increased due to increases in lodgepole pine. Declines in whitebark pine have resulted from white pine blister rust infection, forest succession in the absence of disturbance and mountain pine beetle attacks. AFRC has been a strong advocate for creating openings and patches larger than 40 acres to address needed species conversion and forest health issues. We will suggest later in this document that the 40-acre maximum opening language be increased.

Forest Density
At the Forest scale, the expected trend of density class distribution would generally move towards the desired condition, including increases in the low/medium class and decreases in the high class. These trends are expected to improve forest resilience because, in general, the denser the forest the greater the likelihood that fuel characteristics could support a fast moving intense crown fire due to greater fuel quantities and the vertical and horizontal continuity of fuels. Again, moving towards desired stand density conditions will require the Forest to do broad mechanical treatments to achieve these goals and NRV.

Landscape resiliency
To bring the Forest and overall landscape into a more resilient state, increased treatments will be needed. Current data shows that vegetation pattern, vegetation condition class, and insect and disease hazard rating indicate large departures from desired conditions.

***AFRC ISSUE #3: Sustainable Timber Management**

AFRC is strongly concerned about the long-term sustainability of the timber supply on Forest Service land and how the management paradigm is affecting this supply. In particular, we have stated that a management regime that only thins mid-seral forest stands is ultimately unsustainable. If the Forest Service truly wants to manage timber in a sustainable manner, then it must find a way to incorporate regeneration harvest back into its management paradigm. The difficulty that the Forest Service has had implementing any treatment that successfully regenerates a stand of heavy fuels, insect or diseased stands, or mature timber has resulted in an unbalanced age-class distribution across the Forest, and has left a void in stands in the 0-20 year age class. This void concerns AFRC and raises the question of where future timber products off Forest Service lands will come from. We are supportive of the minor thinning prescriptions that are being proposed in this Plan, but only as a component to a larger management paradigm designed to provide timber products in a sustainable manner.

***AFRC ISSUE #4: The Draft Plan is not consistent with the Multiple-Use Sustained-Yield Act of 1960 (MUSYA)**

The DEIS defines a desired condition on page 2-2 as "a description of a specific social, economic, and/or ecological characteristic of the plan area toward which management of the land and resources should be directed." The DEIS describes desired conditions for a multitude of resources, including vegetation. However, the Draft Plan does **NOT** define a "desired condition" for timber resources. Instead, the DEIS on page 3.5.3-1 describes that timber will merely be used as a **"tool"** for meeting ***other*** desired conditions. AFRC interprets this as an indication that the Forest Service does not view timber as a resource worthy of managing to a desired condition in a similar manner as all other resources are. AFRC disagrees with this approach and believes it is in violation of MUSYA. MUSYA mandates the Forest Service to manage its timber resources toward a ***desired condition*** of sustained yield. In fact, nowhere did the DEIS include a sustained yield of timber as a "desired condition." Therefore, the PRISM model and its volume outputs are not based on sustained yield and the subsequent Projected Timber Sale Quantities (PTSQs) are likely inconsistent with the MUSYA.

MUSYA directs the Secretary of Agriculture to "develop and administer the renewable surface resources of the national forests for multiple use and sustained yield of the several products and services obtained therefrom." 16 U.S.C. § 529.

MUSYA also declares that: "the national forests are established and shall be administered for outdoor recreation, range, **timber**, watershed, and wildlife and fish purposes." 16 U.S.C. § 528 (emphasis added). "Multiple use" is defined, in part, as "the management of all of the various renewable surface resources of the national forest so that they are utilized in the combination that will best meet the needs of the American people ...." 16 U.S.C. § 531(a). Further, the Forest Service Organic Act directs that National Forests are to be established "to furnish a continuous supply of timber for the use and necessities of citizens of the United States." 16 U.S.C. § 475.

MUSYA also defines "sustained yield of the several products and services" as "the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the national forests without impairment of the productivity of the land." 16 U.S.C. § 531(b).

The tables in the Timber section of the DEIS (3.5.1), starting on page 3.5.1-27, only identify a "sustained-yield limit." The PRISM models that were run for each alternative only calculated this "limit." In fact, the DEIS indirectly indicates that the PRISM model was run not to calculate a sustained yield level, but rather to achieve desired conditions for resources other than timber. This approach does not satisfy the intent and direction from the MUSYA, as this Act requires the Secretary to develop and administer timber resources for ***achievement and maintenance of regular outputs***. Simply calculating an upper limit for sustained-yield does not ensure that the Forest will "achieve and maintain" regular outputs.

In summary, we believe that the decision by the Forest Service to 1) not identify sustained-yield as a "desired condition" for the timber resource; 2) merely identify timber harvest as a "tool" to meet other desired conditions; and 3) limit its model calculations to upper limits rather than achievement and maintenance of regular outputs, has resulted in a set of action alternatives that are inconsistent with

MUSYA.

***AFRC ISSUE #5: Best Management Practices**

On a day-to-day basis, one primary issue affecting the ability of our members to feasibly deliver logs to their mills is the imposition of firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect 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 environmental documents and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift its methods for protecting resources in this new Forest Plan 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-Clear market area with a variety of skills and equipment. Developing a Forest Plan 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 Plan 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. Tethered-assist equipment is also becoming a more viable and available option for felling and yarding on steep slopes. This equipment has shown to contribute little additional ground disturbance when compared to traditional cable systems. Please develop BMPs in your Plan in a manner that will facilitate this type of equipment.

Since 1999, the Clearwater has used soil detrimental disturbance, as defined in the Region 1 Soil Manual (USDA, 2014), as a proxy and limits the amount of detrimental soil disturbance to 15 percent of an activity area. In areas already exceeding 15 percent, detrimental soil disturbance and ground disturbing activities are allowed if treatments restore soil and leave a net improvement in soil quality. The Nez Perce National Forest Plan Standard 2 limits detrimental soil disturbance to 20 percent of an activity area using similar indicators as those described in the Region 1 Soil Manual (USDA, 2014). However, this has become problematic, as it is more restrictive than the regional guidance and it does not offer the ability to conduct ground disturbing actions on areas over 20 percent even if soil restoration is included. Site specific amendments to the Nez-Clear Plan have occurred in order to enter areas exceeding 20 percent detrimental soil disturbance, thus allowing for multiple resource objectives while showing an upward trend in net soil conditions through soil restoration.

Over the last 30 years, ever improving timber sale contract provisions and best management practices have been developed to minimize the impacts from ground-based harvest systems. Concurrently, advances in machine technology have led to the creation of equipment that is less ground disturbing. Using limitations similar to those described in the Idaho Forest Practices Act best management practices handbook (UI Extension Office, 2015), the Nez-Clear proposes guideline MA2 and MA3-GDL-SOIL-01, which includes the following:

- Ground-based equipment used for vegetation management should only operate on slopes less than 45 percent to protect soil quality.

- Log skidding equipment should only operate on slopes less than 35 percent to limit detrimental soil disturbance.
- Exceptions can be authorized where soil, slope, and equipment are determined appropriate to maintain soil functions.

The Nez-Clear Plan proposes that all land management activities be designed and implemented in a manner that maintains soil function and productivity (FW-STD-SOIL-01). The plan focuses on outcomes to achieve this standard through a mix of mitigation that includes avoidance, logging systems design, retaining sufficient organic matter and coarse wood on the soil surface, and actively reclaiming past and current impaired soils on skid trails, log landings, and temporary roads. Damage to soils would be limited by:

- Using existing or past disturbed areas (MA2 & MA3-GDL-SOIL-02), which would be restored after use.
- Treating areas of impaired soil function from past management activities to restore long-term soil productivity and function (MA2 & MA3-GDL-SOIL-03).
- Decommissioning temporary roads to restore soil function (MA2 & MA3-GDL-SOIL-05).
- Rehabilitating soil function created through future management activities to maintain long-term soil productivity (FW-STD-SOIL-02).

The above standards are too prescriptive and should be amended to account for operational flexibility as well as advances in logging technology and equipment.

***AFRC ISSUE #6: Road Management**

An intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. 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 road decommissioning proposed in the Nez-Clear Plan Revision likely represents a *permanent* removal of these roads and likely the indefinite deferral of management of those forest stands that they provide access to. The land base covered in the Nez-Clear are to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

We would like the Forest to carefully consider the following three factors when making a decision to decommission any road in the plan area:

1. Determination of any potential resource risk related to a road segment.
2. Determination of the access value provided by a road segment.
3. 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.

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 quickly and directly attack nascent fires. 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.

If the Forest Service proposes to decommission, abandon or obliterate road segments from the planning area, we would like to see the Plan 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 quicker and safer access to suppress any fires that are ignited.

***AFRC ISSUE #7: Condition-Based NEPA**

Several of the projects now being planned on the Nez-Clear are using condition-based NEPA for planning. For example, AFRC and our members visited the End of the World Project in the summer of 2019. The Forest listed their desired conditions with no specifics to unit locations, road work, slash work, and other resource impacts. Rather on-site visits and input during the time of sale layout will dictate specific areas that need treating, road systems, fuels reduction needs, aquatic needs etc. AFRC strongly supports the idea of using condition-based NEPA in your planning document and we hope the Forest uses more of this going forward. Condition-based NEPA addresses issues on the ground better, is less expensive, and takes less manpower to implement. The Plan should be clear, however, that site-specific implementation will be subject to preparation of a project EIS, EA, or Decision Memo.

***AFRC ISSUE #8: Scientific Review**

AFRC would like to highlight several studies that may help with implementation of any of the Alternatives. The first set of studies addresses management in the RMZ's, the second set of studies addresses carbon sequestration, and the third study deals with the importance of forest management for elk forage and health. These combined studies we believe will give more support for active management on the Nez-Clear.

1. 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. We would like the Forest Service to review the literature cited below and incorporate its findings into your environmental analysis that will shape the level of management permitted to occur in riparian reserves.

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. Sugdena, Brian D., Steinerb, Ron., Jones, Jay E., 2019. Streamside Management Zone Effectiveness for Water Temperature Control in Western Montana. *International Journal of Forest Engineering,* VOL. 30, NO. 2, 87–98

Key points of the Sugdena paper include:

- Lightly thinned buffers that extend 15.2 meters from the stream resulted in no meaningful change in water temperature.
- Fish data collected at 25 of 30 study sites showed no significant response to the treatment

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.

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 limit any no-cut buffers along streams to no larger than 40 feet and maximize forest health outcomes beyond this buffer.

2. We would like to encourage the Nez-Clear to consider several documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when comparted to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. Ecosphere 7(1):e01224.10.1002/ecs2.1224.

3. AFRC would like to reference a 2018 study, **"Evaluating & Informing Elk Habitat Management"** by DeVoe et.al., that looked at the relationship of forest structure to quality of elk forage. Much of the data from this study came from the Bitterroot National Forest and surrounding

areas and states "Forage abundance and forage quality may also be enhanced through timber harvest treatments that reduce overstory canopy cover. We suggest that focusing management treatments on public lands and in forest vegetation types that are common within a region but with lower nutritional value may be one tool available to attract more elk onto public lands during the summer and reducing the redistribution of elk to private lands prior to and during the fall hunting seasons. Managers could also consider forest treatments in areas identified as important seasonal travel corridors for elk. Combining forest treatments with other strategies, such as reducing availability of high quality nutritional resources on private lands to elk, increasing hunter access on private lands, or altering harvest regulations to more evenly distribute harvest risk across public and private lands, may provide a more holistic approach to encouraging elk to remain on public lands."

Much of the DeVoe study compares the effects of no disturbance, wildfire and prescribed burns and silvicultural treatments. One significant finding outlined includes "*Across disturbance types, the highest predicted TIN (Nutritional Value)values that were significantly different from the undisturbed class* ***occurred in areas thinned ≥21 years prior (7.5% greater), followed by areas clearcut ≥21 years prior (6.7% greater) and areas thinned 11-20 years (5.5% greater) prior.*****"**

Other takeaways from the study include:

- Distribution and availability of high-quality nutrition provided by landscape disturbances—including prescribed fire, forest thinning and openings—strongly influenced elk distribution.
- Forage abundance and quality may be enhanced through timber harvest treatments to attract more elk onto public lands.

***AFRC ISSUE #9: Wilderness and Wild and Scenic Rivers**

AFRC and our members are very interested in how many acres of recommended wilderness and miles of scenic rivers might be considered in this Forest Plan revision. Additional acres designated in this Revision, if approved by Congress, would take timberlands out of the manageable land base and impact long term timber harvests. Such exclusions would also retard the Forest Service's ability to actively manage hazardous fuels and effectively respond to wildfires.

Thirteen areas are being considered for recommended wilderness. Acreage designation by Alternative includes: Alternative W-860,000 acres, Alternative X-0 acres, Alternative Y- 300,000 acres, and Alternative Z-570,000 acres.

For wild and scenic river consideration there are 89 rivers that are free-flowing rivers on the Forest. Of those, 37 rivers were considered as suitable or eligible for wild and scenic consideration. The number of miles of wild and scenic and the acres involved varied by Alternative. Alternative W- 29 suitable or eligible Rivers and 74,464 acres, Alternative X- 12 Rivers, 0 Acres, Alternative Y-14 Rivers, 110,782 acres, and Alternative Z-27 River segments, 166,212 acres.

AFRC believes that while local collaboratives, Tribes, and recreational users have participated in these designations in the past, it is important that the Timber Industry have a voice in any new designation or allocations. From our perspective the potential acres considered for wilderness and wild and scenic are not portrayed as reasonable in any alternative. We would like to see the Forest take a modified

approach with reductions in both wilderness and wild and scenic between Alternative X and Alternative Y. We are concerned that designating the acres portrayed in Alternative Y will greatly impact forest health, wildfire potential and raw materials coming to our sawmills. It is important to recognize that WSR designations could interfere with management activities beyond the ¼-mile corridor, and the DEIS must evaluate those consequences. Further, in making WSR and wilderness evaluations, the Forest should defer to the determinations of the Idaho Roadless Commission under the Idaho Roadless Rule.

Nez-Clear Alternatives Developed for DEIS

Four action alternatives were developed based on internal and external input, including collaboration on alternative development. The No Action Alternative is the existing 1987 Forest Plan that the Forest is currently operating under. All alternatives analyzed in the Draft EIS met a minimum bar of being ecologically, socially, and economically sustainable per the applicable planning rule. They include:

No Action Alternative

These are the numbers the Forest has been using since 1987. Even with the Projected Timber Sale Quantity of 82.2 mmbf, the Forest has only sold an average of 46 mmbf during the past decade.

Sustained Yield Limit (SYL)	**45 MMCF / 241 MMBF**			
	First Decade		**Second Decade**	
	MMCF	**MMBF**	**MMCF**	**MMBF**
Timber Products	Volumes other than salvage or sanitation volumes that meet timber product utilization standards			
Lands suitable for timber production				
A1. Sawtimber	11.0	60.0	11.0	60.0
A2. Other products[2]	2.0	10.8	2.0	10.8
Lands not suitable for timber production				
B1. Sawtimber	1.8	9.7	1.8	9.7
B2. Other products	0.33	1.7	0.33	1.7
C. **Projected Timber Sale Quantity (PTSQ)**[1] (A1+A2+B1+B2)	**15.13**	82.2	**15.13**	82.2
Other Estimated Wood Products	Fuelwood, biomass, and other volumes that do not meet timber product utilization standards			
	MMCF	**Tons**	**MMCF**	**Tons**
D. Fuelwood	11.7	33	11.7	33
E. **Projected Wood Sale Quantity (PWSQ)**[3] (C+D)	**26.83**		**26.83**	

Alternative W

Successful management of each of the resources identified on the Nez-Clear is attainable. Resources such as timber and wildlife are not mutually exclusive. It may be possible to have high levels of timber harvest; sustain rural economies; recover fish and wildlife species listed within the Endangered Species Act; provide clean air and clean water; and provide habitat for viable populations of wildlife species all at the same time. For instance, areas evaluated for recommended wilderness are independent from most areas that provide for timber harvest due to the Idaho Roadless Rule. As such,

it is possible to recommend all or nearly all Idaho Roadless Rule areas for recommended wilderness and have a very high level of timber outputs. Alternative W is a "have it most" alternative. The intent is to couple items that may otherwise be viewed as being mutually exclusive. This alternative has higher levels of recommended wilderness coupled with a higher timber output and a faster rate of movement towards forest vegetation desired conditions. Forest vegetation desired conditions would be minimally met within thirty years. Areas not selected as recommended wilderness allow for motorized use, including within Idaho Roadless Rule areas. Wild and Scenic Rivers found suitable stem from a collaborative approach that looks at rivers outside the wilderness.

Table 11. Alternative W – Annual average projected timber and wood sale quantities with reasonably foreseeable budget, PRISM model

Sustained Yield Limit (SYL)	**45 MMCF / 241 MMBF**			
	First Decade		**Second Decade**	
	MMCF	**MMBF**	**MMCF**	**MMBF**
Timber Products	Volumes other than salvage or sanitation volumes that meet timber product utilization standards			
Lands suitable for timber production				
A1. Sawtimber	44	231	44.9	241
A2. Other products[2]	0.0	41.6	0.0	43.4
Lands not suitable for timber production				
B1. Sawtimber	0.8	9.7	0.0	9.7
B2. Other products	0.0	11	0.0	11
C. **Projected Timber Sale Quantity (PTSQ)[1]** (A1+A2+B1+B2)	**44.8**	293	**44.9**	305
Other Estimated Wood Products	Fuelwood, biomass, and other volumes that do not meet timber product utilization standards			
	MMCF	**Tons**	**MMCF**	**Tons**
D. Fuelwood	11.7	33	11.7	33
E. **Projected Wood Sale Quantity (PWSQ)[3]** (C+D)	**56.5**		**56.6**	

Alternative X

Alternative X responds to several state and local plans that call for fewer or no areas of recommended wilderness, fewer or no suitable wild and scenic rivers, and higher timber outputs. In this alternative, zero areas are recommended as wilderness. The Comprehensive Water Plan is used as a surrogate to continue to protect key tributaries to the North and South Fork Clearwater Rivers while not pursuing Wild and Scenic River Suitable status on any river. Forest vegetation would be within the lower bound of the desired conditions within twenty years. Alternative X has the highest timber output, including a departure from the Sustained Yield Limit (SYL) for a period of two decades at 241-261 mmbf annually.

Table 12. Alternative X – Annual average projected timber and wood sale quantities with reasonably foreseeable budget, PRISM model

Sustained Yield Limit (SYL)	**45 MMCF / 241 MMBF**			
	First Decade		**Second Decade**	
	MMCF	**MMBF**	**MMCF**	**MMBF**
Departure increment	**2.0**		**0**	
Departure Limit	**45.0**		**45.0**	
Timber Products	Volumes other than salvage or sanitation volumes that meet timber product utilization standards			
Lands suitable for timber production				
A1. Sawtimber	47	249	45	241
A2. Other products[2]	0.0	44.8	0.0	43.4
Lands not suitable for timber production				
B1. Sawtimber	0.0	9.7	0.0	9.7
B2. Other products	0.0	10.4	0.0	11
C. **Projected Timber Sale Quantity (PTSQ)**[1] (A1+A2+B1+B2)	**47**	314	**45**	305
Other Estimated Wood Products	Fuelwood, biomass, and other volumes that do not meet timber product utilization standards			
	MMCF	**Tons**	**MMCF**	**Tons**
D. Fuelwood	11.7	33	11.7	33
E. **Projected Wood Sale Quantity (PWSQ)**[3] (C+D)	**58.7**		**56.7**	

Alternative Y

Alternative Y provides for intermediate level of recommended wilderness and moves towards forest vegetative desired conditions in fifty years. Historic snowmobiling areas in the Great Burn are removed from consideration as recommended wilderness resulting in a boundary change, but within the areas moving forward as recommended wilderness we do not authorize any uses that may preclude designation as wilderness in the future. This alternative also looks at the major rivers not designated in the Wild and Scenic Rivers Act as suitable for inclusion in the Wild and Scenic River system. The major rivers not designated include the North Fork Clearwater and South Fork Clearwater.

Table 13. Alternative Y – Annual average projected timber and wood sale quantities with reasonably foreseeable budget, PRISM model

Sustained Yield Limit (SYL)	**45 MMCF / 241 MMBF**			
	First Decade		**Second Decade**	
	MMCF	**MMBF**	**MMCF**	**MMBF**
Timber Products	Volumes other than salvage or sanitation volumes that meet timber product utilization standards			
Lands suitable for timber production				
A1. Sawtimber	28	150	28	150
A2. Other products[2]	5.1	27	5.1	27
Lands not suitable for timber production				
B1. Sawtimber	1.83	9.7	1.83	9.7
B2. Other products	0.42	2.2	0.33	1.76
C. **Projected Timber Sale Quantity (PTSQ)[1]** (A1+A2+B1+B2)	**35.3**	189	**35.3**	188
Other Estimated Wood Products	Fuelwood, biomass, and other volumes that do not meet timber product utilization standards			
	MMCF	**Tons**	**MMCF**	**Tons**
D. Fuelwood	11.7	33	11.7	33
E. **Projected Wood Sale Quantity (PWSQ)[3]** (C+D)	**47**		**47**	

1 Timber Products and Projected timber sale quantity (PTSQ) include volumes from harvested material (other than salvage or

Alternative Z

Alternative Z responds to requests to have an alternative in which natural processes dominate over anthropogenic influence. In this alternative a proposal for recommended wilderness that was brought forward by a group of national and state wilderness advocacy groups was mostly carried forward. Additionally, rivers were viewed as part of a larger system and major tributaries to the Nez-Clear's largest rivers will be analyzed as being suitable for inclusion in the wild and scenic rivers system. Areas in Idaho Roadless Rule Areas will not be opened for additional motorized use and most current motorized use would not be impacted. Reliance on natural process would warrant a slower movement towards forest vegetation desired conditions within an anticipated one-hundred-years or longer. Timber outputs would also be lower and near a lower threshold needed to provide for economic sustainability and sustain rural economies. Additional plan components related to snag guidelines, live tree retention, fisher habitat, and elk security are included that limit uncertainty regarding how and where these features will be located.

Table 14. Alternative Z – Annual average projected timber and wood sale quantities with reasonably foreseeable budget, PRISM model

Sustained Yield Limit (SYL)	**45 MMCF / 241 MMBF**			
	First Decade		**Second Decade**	
	MMCF	**MMBF**	**MMCF**	**MMBF**
Timber Products	Volumes other than salvage or sanitation volumes that meet timber product utilization standards			
Lands suitable for timber production				
A1. Sawtimber	15	80	15	80
A2. Other products[2]	2.7	14.4	2.7	14.4
Lands not suitable for timber production				
B1. Sawtimber	1.83	9.7	1.83	9.7
B2. Other products	0.35	1.87	0.32	1.67
C. **Projected Timber Sale Quantity (PTSQ)[1]** (A1+A2+B1+B2)	**19.9**	106	**19.8**	106
Other Estimated Wood Products	Fuelwood, biomass, and other volumes that do not meet timber product utilization standards			
	MMCF	**Tons**	**MMCF**	**Tons**
D. Fuelwood	11.7	33	11.7	33
E. **Projected Wood Sale Quantity (PWSQ)[3]** (C+D)	**31.6**		**31.5**	

Key Factors and Assumptions that AFRC Supports from the Alternatives

1. The Sustained yield limit h applies to the action alternatives and does not vary by alternative, with the exception of Alternative X. According to the Forest Service, this is the amount of timber meeting applicable utilization standards, which can be removed from a forest annually in perpetuity on a sustained-yield basis.

   The Sustained Yield Limit for all Alternatives is 241 mmbf except for Alternative X which departed from SYI by 20 mmbf over the first decade to reach a volume of 261 mmbf.

2. The total lands suited for timber production varies by Alternative:

	N/A	W	X	Y	Z
D. Total lands suited for timber production because timber production is compatible with the desired conditions and objectives established by the plan	940,446	964,225	969,187	947,776	959,047

3. The amount of unsuitable lands where some timber harvest may occur is 901,649 acres. However, only 1% of these lands may be managed per year or 9,016 acres. AFRC is uncertain where this guideline came from, and while we support it, there might be times when more acres will need to be treated to meet forest health needs.

4. Budget Constraint: Potential Sale Quantity numbers for all alternatives are determined to be within the fiscal capability of the NPCLW. Therefore, meeting the PTSQ numbers is appropriately no longer constrained by the budget.

5. Salvage of fire burned timber and insect and disease damaged timber is additive to the annual harvest volume.

6. Harvest from lands suited for timber production and lands suited for timber harvest for other resource objectives will contribute towards the Potential Timber Sale Quantity. Harvest volumes that do not meet utilization standards will be added to the PTSQ to estimate the Potential Wood Sale Quantity (PWSQ) to reflect the amount of firewood and biomass. The standing volume between 3.0" and 7.0" will not be include in the PWSQ volume, but top wood will be included for intermediate treatments. About 16% of sawlog volume may be added when performing intermediate treatments to account for top wood volume.

7. The component of grand fir, Douglas-fir, lodgepole pine, and Engelmann spruce needs to be diminished across the landscape. Each Alternative varies on time it will take the Forest to get to desired future conditions.

8. Even-aged regeneration harvest methods need to be used to achieve objectives in lieu of uneven-aged regeneration harvest, such as group selection and single-tree selection, and intermediate harvest, such as commercial thins and improvement cutting. This will remove climax species and allow for planting fire resistant species, such as ponderosa pine, western larch, and white pine.

9. Large openings need to be used for regeneration harvests that more mimic the HRV. The opening size needs to be much larger than the 40-acre maximum now used as a Regional guide.

10. Social factors and implications need to be a big driving force for this Plan! The data in the plan shows how important the Nez-Clear is to the logging, sawmilling, local community, and local county infrastructure.

11. AFRC would like the Forest to add or strengthen the language on the use of condition based NEPA. We believe this is the most effective and efficient way to do NEPA and will be a tool that is used more going forward.

12. With the history of fire across the Forest, there must be some mechanism put in place to expedite the salvage and reforestation. In the past, the Forest has been too conservative on the number of acres being salvaged, and subsequently replanted. This is not a sustainable model and needs to change possibly with programmatic NEPA guidelines for larger fires.

13. At present, AFRC cannot support any of the Alternatives in regards to recommended wilderness and miles of wild and scenic rivers. More work and analysis needs to be done on these issues.

Conclusion

AFRC would like to thank the Forest for putting out such a comprehensive and readable DEIS for the Nez Perce-Clearwater Forest Plan Revision. There are some very important themes throughout the document. First, the Plan revision is being done under the 2012 Planning Rule. Budget Constraint numbers for all alternatives are determined to be within the fiscal capability of the Nez-Clear. Because this was determined to be possible, Potential Timer Sale Quantity numbers for all alternatives are determined to be possible within the Forest's budget. Therefore, meeting the PTSQ numbers is no longer constrained by the budget.

The Sustained Yield Limit for each Alternative is 241 mmbf with the exception of Alternative X that departed by 20 mmbf in the first decade. The sawmilling infrastructure remains a very important driver for the surrounding 11 counties that the Forest impacts, and the remaining sawmills are requiring more volume in the future by adding more shifts and new higher tech equipment that is capable of producing more volume. Additionally, to better address the encroachment of grand fir, Douglas-fir, subalpine fir, and Engelmann Spruce, the harvest regimes need to be heavily weighted to regeneration harvests.

Despite the determination of a sustained-yield limit, we do not believe that the Plan adequately adheres to the MUSYA for those reasons we outlined above. Due to the nature of how timber resources are addressed in this Plan, the alternatives developed fail to attain the "achievement and maintenance in perpetuity of a high-level annual or regular periodic output" of timber.

Because the existing Forest Plan annual harvest has only been 46 mmbf, there has been a huge buildup of fuels and biomass across the Forest creating risks of wildfire and insect and disease outbreaks. Forest density is higher in most forested stands that NRV ranges, Forests operating under natural disturbance regimes and scales should be more open, current density exceeds the upper ranges calculated in the NRV analysis as well as the desired conditions developed for forest structure, and finally over 40 percent of stand are now in a closed canopy, single storied condition. In summary, the Forest has greatly departed from the Historic Range of Variation (HRV). Getting the Forest back in balance with Desired Conditions varies with each alternative (see below).

Alternatives for managing forest ecosystem

	Alternative W	Alternative X	Alternative Y	Alternative Z
Timber Volume (million board feet annually)	220-241	241-261	120-140	60-80
Acres Treated Annually	13,760	15,120	8,030	5,070
Years to meet Desired Conditions	30	20	50	100

AFRC believes there needs to be a balance of 1) work to be done on the Forest, 2) the urgency of getting acres treated for forest health, fuels reduction, and the subsequent timber volume that would be produced, 3) the capability of the existing and possible new infrastructure to get this wood processed and 4) the economic needs of the surrounding counties and communities.

With all of these factors considered AFRC feels that a new Modified Alternative needs to be implemented that combines some of the better parts of Alternatives W, X, and Y.
We believe Alternative Y takes too long to get to HRV and doesn't meet the future needs of the forest products industry in the coming years. Even under the best circumstance, Alternative Y will take 50 years to get to desired conditions, harvests will be capped at 140 mmbf, and stand conditions forest wide will continue to deteriorate. The final Alternative should provide the Forest and the forest products industry time to ramp up beyond the 140 mmbf level to more quickly attain the desired conditions for the Forest. This Plan is to look at the short term which is defined as the proposed length of this new Plan which is 15-20 years. However, in reality looking at how long the current Plan has been in use (33 years), there could be a real need for the Forest to consider other outputs along the way to be flexible in what long-term volume the forest products industry might need as well as achieving the desired conditions on the Forest.

AFRC also believes the Forest could have done a better job highlighting the importance of the forestry sector in the economic discussions and what the industry means to the counties and communites. This work could have been enhanced by contacting all surrounding logging contractors, timber purchasers, and sawmill faciilties to get their direct employement figures and plans for operations and future plant expansions. AFRC requests some flexibilities in how the Forest handles road issues such as decommissionings, closures etc. We also encourage flexibilities in the use of new and inventive ground skidding techniques and where and how they may operate. We encourage the Forest to consider this more flexible language that we have outlined including using condition based NEPA for planning purposes on individual projects.

Thank you for the opportunity to comment on the Nez Perce-Clearwater Forest Plan Revision DEIS. I look forward to working with the Forest as you move towards implementation.

Sincerely,

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