



January 23, 2015

Keith Lannom, Forest Supervisor
Payette National Forest
500 N. Mission Stree
Building 2
McCall, ID 83638

VIA EMAIL: comments-intermtn-payette@fs.fed.us

Re: Middle Fork Weiser River Landscape Restoration Project Scoping Comments

Dear Keith,

Thank you for the opportunity to comment on the Middle Fork Weiser River Landscape Restoration Project Project (MFWR) on the Council Ranger District. These comments are on behalf of the members of the American Forest Resource Council (AFRC). AFRC represents nearly 60 forest product businesses and forest landowners in five states. Our mission is to create a favorable operating environment for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving federal laws, regulations, policies and decisions that determine or influence the management of all lands.

A few comments:

1. One of the items under the "Purpose" of the MFWR project is to "Contribute to the economic vitality of the communities adjacent to the Payette National Forest". AFRC strongly supports that concept, however this statement in and of itself is vague and will be very difficult to quantify. As you know, the law says that Purpose and Need (P&N) statements can't be impermissibly narrow so as to draw a straight line from the P&N to an action but they should be detailed enough that the agency can meaningfully evaluate its alternatives, and focus the action towards the desired action. If the P&N is the potential exists for groups and individuals to come in with numerous other "reasonable alternatives" (based on the broad P&N statements) that the agency didn't consider, and argue that it should have considered them. An example of this that arises frequently is "ecosystem" service work as a huge economic driver. Please narrow this P&N statement so that it clearly identifies wood products including but not limited to merchantable sawlogs to focus at least a portion of this project on timber and wood products

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production. It is also important to provide an alternative that maximizes wood fiber production for local and regional forest industry infrastructure.

2. AFRC supports work in RCAs and strongly encourages that activity. A field trip in 2012 to the Trinity Fire area on the Boise National Forest provided numerous examples of the devastation that wildfire can inflict on riparian areas that are overgrown with vegetation. Miles and miles of pristine bull trout habitat were destroyed during the Trinity fire. Research provided by Charlie Luce strongly encourages treating right next to streams to enhance riparian areas. This type of work directly next to streams does the most to stabilize stream banks and accelerates vegetation sprouting after fire. Please ensure that you are utilizing the "best available science" when treating these RCAs. Some areas of the MFWR project have roads that are close to streams with the vegetation next to the roads away from the streams in desperate need of treatment of provide for firefighter safety and access. Please ensure that these areas are adequately treated.
3. Watershed restoration and road management are critical activities. Is it really necessary to completely decommission over 16 miles of system roads? Are there ways that roads can be storm proofed and watershed function improved without the expense of complete decommissioning? On one of the forests I work on (Mt. Hood in Region 6) roads were decommissioned then needed for wildfire access and had to be re-established. This is not acceptable both from a fiscal and a resource standpoint.
4. If Lynx habitat becomes an issue please carefully analyze. Single species management doesn't work. Nor does trying to manage for every species on every acre.
5. Please ensure that you treat enough acres of the landscape, especially in PVG 6, to meet objectives on the landscape. Please refer to the recent PNW-GTR-897 *The Ecology and Management of Moist Mixed-Conifer Forests in Eastern Oregon and Washington: a Synthesis of the Relevant Biophysical Science and Implications for Future Land Management*. Have you adequately assessed where there are areas of high restoration need caused by previous management or natural circumstances? And how those areas fit with identified priorities? An example would be an area that was subject to an "over-story removal" historically. When the large old seral species over-story were removed from a well growing, stocked, understory of small saw-timber, primarily grand fir. The research identifies this situation as one where the priority for treatment should be high because of the jeopardy this forest situation places on restoration because of fire and insect-disease risks to this and other adjacent stands.

The MFWR project has the potential to be very beneficial to social, economic, and ecological resources. I look forward to providing comments on the draft environmental document.

Sincerely,



Irene K. Jerome
AFRC Representative, Eastern Oregon/Southwest Idaho