



Via Email: [comments-pacificnorthwest-malheur-prairieciti@fs.fed.us](mailto:comments-pacificnorthwest-malheur-prairieciti@fs.fed.us)

August 13, 2018

Prairie City Ranger District  
c/o Kathy Schnider  
327 SW Front St  
P.O. Box 337  
Prairie City, OR 97820

Dear Kathy:

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

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 Malheur 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 has the following comments on Cliff Knox.

Table 1 in the scoping letter indicates that 25,882 acres, or approximately 65%, of the 40,000 Cliff Knox planning area are allocated to the General Forest/Range (MA 1-2). AFRC strongly encourages treating as many acres as possible within this land allocation. The primary goal of this land allocation is to "Manage for timber production and other multiple uses on a sustained yield basis." Since 65% of the planning area lies within this allocation, the Purpose and Need for this project should reflect this, which it currently does not. Until such time as the Malheur Forest Plan is amended or replaced, the Forest must comply with the management direction contained therein which in this case should lead to the treatment of the majority of the mature timber stands either through aggressive thinning across all age classes or regeneration harvest such as shelterwood cuts.

In order to prepare economically viable timber sales, the Malheur National Forest must increase the average diameter of trees designated for commercial removal. The forest industry cannot survive (let alone thrive) on enormous volumes of small ponderosa pine, Douglas-fir and white fir. It is very difficult to create an economically viable finished product from juvenile ponderosa pine. Another factor often overlooked is tree height and form. Forest lands with relatively low site productivity, which is the

case on much of the land within the Cliff Knox project area, produce trees that are often quite short with poor form. The Douglas-fir in this area is typically of very poor quality which cannot be manufactured into a viable finished product and therefore are often not merchantable. When average stand diameters for removal of ponderosa pine are less than 14 inches DBH, economic viability is dubious. Based on a publication from the Oregon State University Extension Service dated July 15, 2018 the mill in John Day will pay \$265 per MBF for scaling diameters in the 8-11 inch range. Given the location of Cliff Knox it is highly unlikely that the value of the trees less than 14 inches DBH will cover logging and hauling costs. Any “biomass” removal should also be designated as “subject to agreement” in the contract as this product’s economic viability is very volatile. Much of the time, there is not enough value in the material removed to “require” biomass removal. Biomass will be removed if it is economically viable to do so. Once again, the geographic location of Cliff Knox makes removal of biomass from the site financially impossible. AFRC members appreciate the potential opportunity to leave this material at the landing.

Conifer management in riparian areas and meadows is critical for establishment and growth of desirable shrubs, willows, grasses, and other suitable vegetation for the meadow or riparian area. The Cliff Knox Project should establish appropriate future densities of conifer in these areas by evaluating the size and number of conifers that historically occupied these areas. If meadows historically did not support any trees, all trees regardless of species, age and size, should be removed to restore these areas to historic conditions. Removal of larger trees, even on a very limited basis, will greatly improve the economic viability of the Cliff Knox project. AFRC fully supports and encourages the removal of commercial material generated as a result of riparian and meadow enhancement projects and supports investing that value directly back into funding future uneconomical riparian or meadow enhancement projects.

AFRC supports work in juniper woodlands and shrub steppe areas. AFRC does not support leaving young juniper greater than 21 inches. Please include statements in the EIS to allow for commercial removal of juniper.

All trees, regardless of age, size and species should be removed from aspen stands and mountain mahogany patches. If there is a need to remove trees greater than 21 inches DBH to meet objectives of the project, they should be removed even if this would require a forest plan amendment. They also provide a seed source for the future. Trees 21 inches and larger compete with mahogany and aspen just like their smaller counterparts. With regard to aspen, please refer to Forest Service General Technical Report, PNW-GTR-806, May 2010, **Aspen Biology, Community Classification, and Management in the Blue Mountains**

The scoping package for Cliff Knox indicates there may be slope limitations for ground based-equipment in the planning area. If there are slopes to be treated that exceed 35 percent and cable logging is being considered, please analyze for both ground-based and cable systems in these areas. AFRC is working with the Malheur timber staff to find suitable alternatives, that meet restoration objectives, for working on steeper ground.

It appears that these steeper areas will also have prescriptions requiring variable density thinning, skips and gaps, and “removal of created biomass for commercial purposes” if feasible. These requirements will add expense and complicate logging on cable ground. AFRC requests that you consider more

straight forward silvicultural prescriptions that will allow these steeper slopes to be treated to improve stand health and reduce fuels and fire risk.

The Cliff Knox project proposes to implement prescribed burning in the entire planning area. Given the number of both imposed and natural restrictions on prescribed burning, this is probably not a realistic goal. Please be very clear about the potential timeframes, possible alternatives, and the effects if large scale under burning is not achieved.

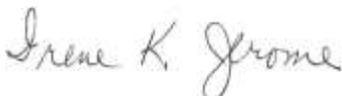
AFRC advocates allowing as much flexibility as possible within the contract while still meeting the management goals and guidelines contained in the NEPA document. This flexibility allows the purchaser to use the most economically viable systems thus increases the ability of the purchaser to pay higher 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. Locking in the specific types of logging systems and equipment in the NEPA document removes flexibility during the implementation stage. Analyzing areas for “tractor/cable” and working with industry on the ground during implementation will provide for best meeting restoration objectives that are economically viable.

During the August 8, 2018 field trip on the Prairie City and Blue Mountain Ranger Districts, Forest Service personnel mentioned that projects would no longer be calling for “wildlife skips” or thickets of trees within project units. Apparently, they are difficult to implement and work around and it appears that wildlife are not utilizing them. Further, adequate areas for cover are available near project units to meet this need. Please utilize this concept in Cliff Knox.

The road system proposals must be closely reviewed to verify the status of these roads on the ground. If there are roads that have grown over and are not utilized in the Cliff Knox Project, they should be considered “closed” rather than formally decommissioning if they are not contributing to resource damage. Road infrastructure is extremely important, and expensive to construct. It may be necessary to utilize these roads again in the future. With the road bed already in place the costs of re-opening are reduced. Seasonal closures or other measures to close roads that are utilized rather than “decommissioning” should be considered if at all possible.

I look forward to the next steps in the planning process on the Cliff Knox project, which has the potential to provide significant ecological, social and ecological benefits to the local area and the region. Please feel free to contact me if I can assist you with determining the economic feasibility of silviculture treatments and logging system requirements.

Sincerely,



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