



May 15, 2018

Jessie Berner, Chetco Bar Fire Salvage Coordinator
Gold Beach Ranger District
29279 Ellensburg Ave
Gold Beach, OR 97444

In Reply To: Chetco Bar Fire Salvage Project Draft EA

Dear Ms. Berner:

Introduction

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 Gold Beach Ranger District, 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 Oregon's forest sector employs approximately 76,000 Oregonians, 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 in that more than 50% of all manufacturing jobs are in wood manufacturing.

AFRC is glad to see the Gold Beach Ranger District recognize the need to conduct salvage operations on Matrix lands affected by the Chetco Bar Fire. AFRC wants to commend the Rogue River-Siskiyou National Forest (RR-SNF) for pulling together this EA promptly. As an industry association, we know the longer it takes to get the NEPA completed for a salvage project, the less economic the project becomes.

The Chetco Bar Fire Salvage project has a large project area and scale is an important consideration. The RR-SNF covers 1,723,179 acres. The Chetco Bar Fire burned almost 10% of this area (191,197 acres) of which 170,321 acres was National Forest System (NFS) lands. About 144,935 acres of the 170,321 acres burned on NFS lands are in reserves or restricted management land use allocations. That's 85% of the burned acres! Consequently, 15% (25,386 acres) of the NFS lands fire burned are classified as Matrix. Only 13,626 acres of these Matrix

lands burned at moderate-high severity with 50-100 percent basal area loss. In total, only 8% (13,626 acres) of the acres burned on NFS lands were considered for treatment within this project. In Alternative 2 (Proposed Action), this number was further reduced to 4,090 acres of proposed treatment. Only about 2.5% of the acres burned on NFS lands and 0.2% of the entire RR-SNF are proposed for treatment under this EA. The area being proposed for treatment is but a tiny portion of the landscape.

We urge you to remember these small numbers when deciding whether or not to retain or defer a stand in the Record of Decision (ROD). The Matrix land allocation is the only area of the National Forest where our members can depend on a stable and sustainable supply of timber products. We believe salvage and reforestation of burnt stands in this Matrix land is crucial to achieving this stability and sustainability. We understand the multitude of additional objectives that must be met on this Matrix land in addition to timber supply; but we also believe that timber supply should be a priority.

Your management plan direction on this issue is clear and concise: “In the Matrix, objectives for management after stand-replacing events will generally differ from those for Late-Successional Reserves. Economic benefits of timber production will receive greater consideration. For example, the commercial salvage of dead trees will be less constrained and replanting disturbed areas will be a high priority.” (NWFP ROD 1994, pg. B-9). We are pleased the District kept this directed priority in mind and moved forward with a project that treats the affected forested stands in a proper manner through burnt timber salvage and post salvage planting to a level that will support a healthy and productive forest in the future. The Forest Service has developed a Proposed Action that proposes salvage treatments in line with these values, and we urge you to select and implement this Alternative.

Purpose and Need

Because the Purpose and Need for the Chetco Bar Fire Salvage project is focused, the scope of the project activities are also narrow which we wholeheartedly support. “The purpose of the Chetco Bar Fire Salvage project is to capture timber value in the matrix land allocations by harvesting dead, dying and/or damaged trees resulting from the 2017 Chetco Bar fire. ... There is a need for timely salvage harvest to capture merchantable timber value before further wood deterioration occurs.” (EA, pg. 1-4 & 1-5). Matrix land allocation emphasizes obtaining a full yield of timber within the capability of the land.

The draft EA takes a focused approach, where recovery of the economic value of the damaged timber resource is the primary objective. We appreciate this approach and urge the Forest Service to include timber production and economic return as the projects drivers on future projects, both green and salvage. Unfortunately, in recent years the timber aspect of the Forest Service’s mission has been at best marginalized, and at worst masked, and we hope to see that trend change in the future. We believe timber management is a worthy and commendable aspect of the Forest Service’s mission and projects with an emphasis on this are appropriate. Ultimately, AFRC and its members advocate for salvage of damaged timber resources because capturing its value aides in providing the needed raw material to drive Oregon’s wood products industry. These are renewable products made from a renewable resource, and this fact alone

justifies the environmental impacts associated with the removal of this resource from the landscape.

Scope

The maps provided by the Forest Service indicate areas considered and proposed for salvage. It's clear, based on these maps and the language in the EA, that the Forest Service has limited their consideration of salvage to lands designated as Matrix that burned at a moderate to high severity level as identified on the Soil Burn Severity maps completed by the BAER team in October of 2017. We are satisfied that this strategy was employed and a high-level assessment of where to prioritize salvage was used. Following the initial partition, an additional 9,536 acres were excluded from consideration due to the removal of inventoried roadless areas (IRAs), units lacking economically viable products, logging systems operability and accessibility, locating and avoiding unmapped riparian reserves, and considerations for post-fire wildlife habitat and other resources. Due to the scale at which the Proposed Action has already been reduced, we would like to see **full implementation of the remaining 2.5% of the burned acres included in the DN.**

Inventoried Roadless Areas

The Matrix land allocation includes IRAs, yet there are no actions proposed inside the IRAs. If capturing timber value on Matrix lands is the purpose of this project, then IRAs should not have been excluded from timber harvest. IRAs are not wilderness and should not be treated as such. The 2001 "Roadless Rule" allows timber harvest if that harvest is conducted to "... maintain or restore the characteristics of ecosystem composition and structure..." This is the perfect time to accomplish objectives within the IRAs, otherwise we do not foresee treatment of these areas in the near future, if at all.

Additionally, these areas are identified in the Siskiyou Land and Resource Management Plan (LRMP) FEIS, Appendix C as primarily General Forest and Partial Retention Visual lands. The FEIS states on page C-111 about the North Kalmiopsis and the Kalmiopsis Addition, "The unroaded area contains approximately 55,256 acres tentatively suitable for the production of timber . . . most can be accessed and harvested using systems currently employed on the Forest today." The FEIS states on page C-269, "The South Kalmiopsis area contains 28,312 acres of tentatively suitable land for the production of timber . . . most can be accessed and harvested using systems presently in use on the Forest today." The Windy Valley and Mt. Emily IRAs are smaller areas and contain primarily low site ground. They need to be managed, but this project may not be the best vehicle to manage them.

Please provide an expanded rationale as to why the IRAs do not have any actions proposed and were not evaluated.

Key Issue 1 and Alternative 3

The goal of any Forest Service vegetation management project should be to meet the stated Purpose and Need to the maximum extent across as many acres of the project area as possible.

The scope, measured in acres treated for this project, should be the metric that indicates how well the Forest Service is meeting its stated Purpose and Need. In other words, meeting the stated Purpose and Need on 500 acres is inferior to meeting the stated Purpose and Need on 600 acres.

Key Issue 1, “Effects to Complex Early Seral Habitat and Biological Legacies” and Alternative 3 that was developed to address it, will produce an outcome that fails to meet the Purpose and Need to its greatest extent and no part of Alternative 3 should be considered in the final decision. Alternative 3 fails to fully apply the LRMP, as amended by the Northwest Forest Plan, as this plan, states that the Forest-wide goal of the Matrix land allocation is to “provide a balance of resource management that will maintain a healthy Forest ecosystem and help to **supply local, regional and National Social economic needs.**” As we already discussed, the “balance” between salvage treatments designed to supply local needs and areas where salvage is deferred is already extremely disproportionate (4,090 versus 166,231 acres), and any further reductions that would exacerbate this disparity between active management and passive management would be a further departure from your LRMP’s well described goals. A ratio of 40:1 in favor of no salvage/passive management versus salvage and active management should not be stretched any further.

There are many reasons why this Issue and Alternative do not align with the Purpose and Need, as well as reasons why it does not make logical sense as a forester and land manager. These include, but are not limited to:

1. Issue 1 is not explicit enough in its intent and rationale.

Please list the species that are “complex early-successional” obligates within previously burned areas.

Please identify if the species also needs large biological legacies, e.g., why cutting the trees in these stands will degrade the habitat needed for the species.

Please list the amount of habitat each species needs and how much of this habitat exists on the forest.

Please provide a rationale as to why this habitat is so important that Alternative 3’s limited actions are warranted to be seriously considered.

2. Issue 1 and Alternative 3 have no basis in the Forest’s LRMP. Your LRMP does have requirements for snag retention across the landscape, which your analysis shows to be met and exceeded. There is no basis in the LRMP for additional snag retention in the name of “complex early seral habitat.”
3. The unmanaged stands deferred in Alternative 3 cannot have a closed canopy to qualify them as early seral. It is unclear which of these stands have open canopies to the extent that they would qualify as early seral habitat.
4. Early seral habitat will exist after harvest and will diversify over time under the Proposed Action. Furthermore, the description of the Proposed Action and subsequent analysis assumes that 100% of the “biological legacies” will be removed. This is false. The LRMP

requires retention of a percentage of standing snags as well as coarse woody debris. Therefore, the Proposed Action will retain a level of these legacies and the analysis should consider this and highlight it so that the decision-maker is aware.

5. Issue 1 discusses unmanaged stands, yet on page 3-8 of the Draft EA, Environmental Consequences to Complex Early Seral Habitat and Biological Legacies (Issue 1) talks about the affected environment being stands harvested and reforested more than 80 years prior to the Chetco Bar fire. The deferred stands in Alternative 3 are considered unmanaged. The USFS recently hosted a symposium, “Ecological, Economic and Social Objectives for managing stands over 80,” which focused on the science behind the arbitrary 80-year-old threshold. We encourage you to review the presentations contained [here](#). Due to the nature of this project as a fire salvage, the reserve age guidelines are not relevant.

Please explain why stands harvested and reforested more than 80 years prior to the Chetco Bar fire are considered unmanaged and where the importance of the age of 80 comes from.

6. Table 8, on page 3-7 of the EA, indicates that 100,655 acres of unmanaged NFS lands burned at a high enough intensity to be considered “complex early seral habitat.” Assuming that “complex early seral habitat” is a valid objective and its attributes are consistent with what is described in the EA (as burned unmanaged stands), even full implementation of the Proposed Action still only salvages 2.2% of the “complex early seral habitat.” Once again, the issue of balance arises. In our opinion, 2% versus 98% is not a fair balance. Implementation of Alternative 3 would make that balance 0% versus 100%. Is this really a fair balance in the eyes of the Forest Service to accommodate for an objective that is not even described in your LRMP? The concern raised by the commenters who requested Key Issue 1 to be considered is expressed on page 3-9 of the EA as “a concern that early seral habitat would be diminished beyond acceptable levels.” Does the Forest Service agree that “beyond acceptable levels” correlates to less than 98%? What is the “acceptable level”? Is it 100%?
7. Implementation of Alternative 3 would be inconsistent with the Forest’s snag and down wood guidelines. The Forest Service has used the DecAid model to predict and advise appropriate levels of snags to meet LRMP guidance. **Figure 4 on page 3-19 of the EA indicates that the Chetco River Watershed currently has 3-times as many snags greater than 12” based on DecAid and 10-times as many snags greater than 24” based on DecAid.** Given this compelling data, how could the Forest Service possibly justify selecting an Alternative that exacerbates this excessive snag condition even further by leaving **additional** snags on the landscape?

Please explain why the Proposed Action does not meet the intent and reason for having Alternative 3.

Analysis Issues

The Purpose and Need of the EA is clear “to capture timber value in the matrix land allocations by harvesting dead, dying and/or damaged trees” (EA, pg. 1-4). It is unclear, however, how “Other Undeveloped Areas” is a pertinent analysis issue. It does not have any connection to the Purpose and Need of the project nor does it have any foundation in your LRMP. We are also unsure why Alternative 3 has no effects to “Other Undeveloped Lands.” The term “undeveloped

lands” is defined to include “acres of land that have no history of harvest activity and do not contain forest roads and are not inventoried roadless areas, or a designated wilderness area.” The analysis of undeveloped lands seems to be included in the Draft EA in order to satisfy the desires of a special interest group and does not truly analyze the ability of each Alternative to meet the Purpose and Need. “Undeveloped Lands” or “Undeveloped Areas” are merely terms crafted by special interest groups to further their agenda of limiting active management on our National Forests. “Undeveloped” has no legal or biological significance, nor is it a basis for any NEPA analysis.

The EA reads on page 3-61 that “there are no Forest-wide or management area standards specific to undeveloped lands in the Siskiyou Forest Plan.” So, it’s clear that the Forest Service has no basis in their LRMP for analyzing and mapping “undeveloped areas.” Rather, it seems that the Forest Service completed this analysis and mapping exercise due to scoping comments that requested consideration of “undeveloped” lands greater than 1,000 acres based on the assumption that such lands provide a “value” to “fish production, other aquatic and terrestrial species, and high-quality water.” However, these supposed “values” have not been quantified in the EA nor have they been quantified in any relevant scientific literature. Therefore, there is no basis for their inclusion in this effects-analysis.

AFRC believes that incorporation and analysis of resources either not described in your LRMP nor based on sound science should not be incorporated into project level EA’s. Therefore, unless the Forest Service can compile a compelling collection of peer-reviewed scientific literature that describes the “values to fish production, other aquatic and terrestrial species, and high-quality water” that is provided by “undeveloped areas greater than 1,000 acres” then this portion of the Chetco Fire Salvage EA should be removed.

Furthermore, until such scientific literature is provided, it renders the effects-analysis completed on the impacts of the Proposed Action to these areas meaningless. In other words, how can you analyze the impacts to an “area” and the “values” it provides if you cannot quantify those values based on science? We believe you cannot, and again urge you to remove this section from the EA.

It is inappropriate to identify “undeveloped” lands in a project planning process. In January 2015, the Forest Service released the final directives that implement the 2012 Planning Rule. These directives (FSH 1909.12, 70) supersede past directives for forest planning and describe the process used during Forest Plan revision to describe and define these areas. The directives clearly state that the Wilderness identification, evaluation, analysis and recommendation process occurs during forest plan revision not at the individual project level. FSH 1909.12, chapter 70 states that inventory of areas that may be suitable for inclusion in the NWPS shall occur during forest plan development and revision. The environmental analysis for this project should not include any detailed analysis of how it will impact undeveloped lands, roadless or potential wilderness areas including areas identified by interested parties, unless such areas have been previously inventoried under the RARE II process or identified during forest planning. Once those areas are identified under the RARE II process or during forest planning, it is appropriate to evaluate impacts on them. But evaluating “undeveloped lands” impacts willy-nilly is not appropriate. The issues and concerns brought forth by the public concerning these points should

be addressed by reference to the new planning rule, current regulations and handbook. Please see pages 12-13 of the [Record of Decision](#) for the Goose EIS as an example of how to properly address this issue.

Nor should there be any analysis for “undeveloped” characteristics apart from their inclusion in a PWA. Any such analysis would violate NEPA and should be deleted from the EA. The Ninth Circuit, in *Lands Council v. Martin*, 529 F.3d 1219 (9th Cir. 2008), held roadless areas must be analyzed to the extent they have attributes with “independent environmental significance” and have potential for designation as wilderness. *Id.* at 1230. Thus, there is no such thing as an “undeveloped” area outside a PWA context that can be analyzed. Such areas may have attributes with independent significance, which will be captured in the NEPA analysis for project effects. But the Forest Service cannot, consistent with its planning process, add a new step for so-called “undeveloped” areas that were already excluded from inventory as a PWA.

Please explain why “Other Undeveloped Areas” is an analysis issue and how it is related to the Purpose and Need of the project. If there is no correlation, then remove this analysis issue.

Economics

The cost of helicopter logging has been grossly under estimated. Helicopter logging cost is closer to \$800/MBF.

Please change the helicopter stump to truck cost from \$400/MBF to \$800/MBF.

Wildlife

The Draft EA states on page 3-40, “Given that occupancy of NSO sites in the action area has not been known for many years and owls in sites severely affected by the fire may have shifted their activity centers, any substantial patches of remaining high RHS NRF may be occupied by NSO.” There is also mention throughout the document that known (historic) nest patches will be protected. We believe it should be one or the other. If you think that owls will shift their use around actual habitat on the ground, then protect 500 ft. from that habitat and move away from putting restrictions in or near severely burned historic circles.

Please explain your rationale for protecting known nest patches (without current survey data) and areas of dispersed high RHS.

It is also unclear why PFF2 is even considered PFF. It seems to be too far away for an owl to travel. Because there is no distance cap, PFF2 is therefore anywhere that is not PFF1.

Please explain why PFF2 is considered PFF at all and how far can PFF2 really be away from identified suitable habitat.

Please identify the size, in acres, the existing NRF (500ft. or more away) must be to consider any given location a PFF1 or PFF 2 identification.

Climate Change

The forest product industry stores carbon in wood products for the life of that product. This carbon sink should be discussed within the climate change chapter of the EA. There is a significant difference between the Alternatives.

Please include the storage of carbon in wood products from the sale of timber into your considerations of net emissions of greenhouse gases.

Appendix A

Ultimately, AFRC wants to see the land get treated and the timber products' value get captured. Timely completion of this project is crucial to the viability of the timber products affected at the time of implementation. We appreciate the Forest Service pursuing an Emergency Situation Determination to help expedite this implementation. Following the analysis, timely completion of logging operations will be crucial to the viability of the timber products at the time of their arrival at a raw material manufacturing facility. This timely completion will be partially dependent on the restrictions implemented by the Forest Service. In particular, if the timber sales generated from this project sell in the summer months, it may be necessary for operators to log and haul during winter months if they wish to capture the value in the logs. We thank the Forest Service for creating a document that permits such operations and allows operators the ability to mitigate risks to get these products to the mill in a timely manner. Looking at the fire-killed trees today, one will see the tops of these trees already showing signs of damage that will severely limit their value, and we thank the Forest Service for making efforts to mitigate this limitation.

Ideally, purchasers will pursue removal of the damaged timber products as soon as the sales are awarded, which could be as early as mid-summer. Operating restrictions for threatened wildlife species such as the marbled murrelet and northern spotted owl often extend into mid-September. Having to wait until late September to initiate operations could compromise the viability of any sales generated off this project. We appreciate the work you have done in conjunction with the Fish and Wildlife Service to free up August 6 – September 15 for marbled murrelet restriction, making them daily timing restrictions. We also want to thank you for including language in the northern spotted owl haul restrictions that allow acceptations by the wildlife biologist. This will aid in the ability of operators to begin salvage operations as soon as possible.

We understand that the Forest Service considered standards for snag retention and other resources during the design of this salvage project. We would like to remind the Forest Service that the Northwest Forest Plan discusses standards & guidelines in the context of the landscape: “manage to provide a renewable supply of large down logs well distributed **across the**

landscape.” (NWFP ROD 1994: pg. C-40). The terms “across the landscape” and “throughout the Matrix” are frequently used in the Northwest Forest Plan when describing standards and guidelines.

The Chetco Bar Fire burned over 170,000 acres of Forest Service managed land. The Forest Service is proposing to salvage, at most, 2.5% of these acres. If one was to look only at those acres where salvage would occur, it would appear the Forest Service is conducting an intense economic recovery project. However, if the agency puts these acres into perspective in the context of the entire fire area, it’s clear that only a fraction of the affected timber value will be recovered. AFRC urges the Gold Beach District to remember this landscape perspective by identifying and quantifying (as best as possible) just how many burnt acres and how much burnt timber will **not** be salvaged; and how these many acres of burnt forest not salvaged will meet the standards and guidelines of the NWFP for snags as well as other resource needs.

We are concerned with the prominent level of subjectivity to the snag retention design criteria in PFF1 and PFF2 on page A-1 of Appendix A. First off, does it matter if the core or home range is severely burned and degraded? Elsewhere, “take” is assessed at the threshold of 50% of the core area being suitable and 40% of the home range being suitable. Secondly, why is RHS being used in PFF2? It is our understanding that PFF2 is more than 500 ft. away from any suitable NRF.

Please identify how monitoring will be completed to ensure objectives are met on the ground.

Please disclose if the level of burn severity is being taken into consideration within historic core areas and home ranges for the flow chart on page A-1.

Please disclose if an owl circle will not be considered if there is more than 50% of the core burned under high severity and no longer suitable, as well as if the home range is no longer 40% suitable.

Please identify if you assuming the high RHS has suitable habitat in it or has this been field verified.

Please divulge if there will be or has been any owl calling to check for occupancy within historic owl circles and areas of high RHS.

Below are questions and concerns we have regarding the Design Criteria outlined in the Table starting on page A-3. These are referenced by the PDF No.

Overall: It has come to our attention some of the project specific Design Criteria would be better suited for a “green” project, not specific to fire salvage projects.

Please verify all Design Criteria are project specific and have not been duplicated from projects containing only “green” timber management.

Appendix A should only have project specific Design Criteria. If the criteria are in the SLRMP or NWFP, then they do not need to be repeated here.

Please delete any non-project specific Design Criteria from Appendix A.

WL-1: Does it matter if the nest patch is unsuitable habitat now or will each nest patch be a no cut?

WL-4: “[...] unless protocol surveys have determined the nest site or habitat not occupied, non-nesting, or failed in nesting attempt.” Does this mean the Forest Service will be calling to determine this, or will purchasers be allowed to pay for independent surveys?

WL-6: Will these nest sites be surveyed by surveyed? Does this mean the Forest Service will be calling to determine this, or will purchasers be allowed to pay for independent surveys in nest sites and unserved NRF habitat?

WL-8: Does the protection buffer of 70ft. only apply to trees with nesting structure and live trees surrounding it? In other words, are you applying this buffer to live trees with structure surrounded by snags?

S-2: When you say, “Roadside Danger Tree Abatement harvest units overlapping with area salvage would be a priority area to evaluate,” do you mean during the operation of the area salvage or after operations are complete?

S-4: Please site (SLRMP IV-44, S&G 7-2).

S-5: This exact text is already in the SLRMP as cited and thus is not a project specific Design Criteria and does not need to be included in the list. Appendix A should only be for project specific Design Criteria, not to reiterate the Standards and Guidelines in the SLRMP.

S-9: This is already stated in the SLRMP IV-44, 7-2. It is worded differently but states the same thing.

S-10, LH-2, LH-3, LH-4, LH-9, LH-10, LH-12, SIL-1: Thank you for including flexible language about soil, log haul, and roads. This allows local weather to drive the allowable equipment operations instead of arbitrary dates.

S-12, H-2 & H-3: Please combine these Design Criteria under H-2. It could say, “No new temporary roads, skid trails, or landings are allowed within Riparian Reserves. Avoid locating temporary roads, skid trails, and landings near any type of likely flow or sediment transport conduit during storms, such as ephemeral channels and swales, where practicable. Existing legacy templates may be used after review and approval by Hydrologist, Soil Scientist, or Fisheries Biologist in Riparian Reserves if rehabilitation occurs post-harvest, which would meet ACS objectives by restoring riparian dependent conditions. See Soils PDCs for effective obliteration measures.”

S-15: There is hardly any soil organic matter left in the areas proposed for treatment, therefore this resource is already compromised. With limited burn windows as is, do not limit yourself to an even smaller one.

H-1: This Design Criteria is already failing. You either need to hire more hydrologists or train your layout foresters to correctly identify water features. What happens in practice is this: the hydrologist does not have time to get out before layout and implementation, so the layout forester buffers the water feature to the maximum distance. This has already been happening in the Chetco Salvage Project Area and will account for a LARGE DECREASE (a quarter or more) in implemented acres. Please train more people to type water features, so you stop losing economic acres from timber management or make it a priority to get a specialist into the field to look at all of the water features!

H-6: This mitigation is already identified within H-2. Consider combining with S-12, H-2 & H-3.

LH-6: To allow for flexibility, we would like this Mitigation Measure to read “d) Prior to haul, sediment fences ~~and~~, straw bales, and/or other sedimentation management structures will be installed in ditches to capture sediment in approach areas or adjacent to Coho Critical habitat. Perform maintenance on sediment trap structures as needed (removing deposited sediment).

R-7: Why does there have to be a separate permit for snow plowing? The first sentence is not a Design Criteria. The second sentence is and can be taken care of under the timber sale contract in the Operating Requirements Provision.

R-8: Haul being suspended is not a Design Criteria. It is a part of the timber sale contract. This criterion should be removed.

R-9: Why does burned bark need to be removed from the roadway? Is this realistic for this project area is all locations?

R-11: Please define “freeze-thaw” conditions and the parameters for measuring them that the Sale Administrator will use.

VR-1: These measures do not apply to this project. “a) Cut stumps to 8 inches or less, contour stump cuts to match the surrounding terrain, and face cuts away from the road/trail/site to the maximum extent possible.” This will be nearly impossible. Stump heights should be 12 inches everywhere. “b) Remove timber in a manner that minimizes disturbance to soil and natural forest duff layers, rehab drag marks to natural existing condition.” There is no duff left, it has all been burned. “e) Locate temp roads, landings, and piles beyond the immediate foreground to the maximum extent possible.” This can be combined with VR-26 & VR-27.

Overall, this measure is unrealistic and ridiculous for this project especially because there will be roadside salvage in front of the area salvage units that do not have these criteria. This Design Criteria should just be deleted.

VR-2: This Design Criteria is also unrealistic. A landing should be operational and safe. It may be an operational hazard to leave a feathered edge of snags. There is no non-merchantable or small woody understory in most cases due to the high severity of the fire. In general, this criterion is operationally unrealistic for this project and project area and should be deleted.

VR-3: This criterion is a reiteration of stump height in contracts. It should be deleted because it adds no project specific information.

VR-4: This criterion is a reiteration of prescription language and does not need to be in Appendix A. It does not add any project specific information. In general, this criterion is operationally unrealistic for this project and project area and should be deleted.

VR-5: Again, the horizontal and vertical feathering will be near impossible is most locations within this project area. Old landings and road templates should be utilized wherever possible, even if that is within the immediate foreground of road and trail corridors, trailheads, developed and dispersed recreation sites. In general, this criterion is operationally unrealistic for this project and project area and should be deleted.

VR-8: Again, the horizontal and vertical feathering will be near impossible is most locations within this project area. In general, this criterion is operationally unrealistic for this project and project area and should be deleted.

VR-9: These corridors will have road side danger tree abatement and most likely will not have closed-stand characteristics. In general, this criterion is operationally unrealistic for this project and project area and should be deleted.

VR-10: Are these parameters explicit in your LRMP language for Middleground Retention? Timber management is a part of managing the ecosystem. It is an educational opportunity for those who do not understand and again, the horizontal and vertical feathering will be near impossible is most locations within this project area. Because the hardwoods are not to be cut, they should help mitigate the visual effects.

VR-14: At this point, any limitations to a purchaser's ability to move damaged wood to a manufacturing facility could complicate the success of this project. Did the Forest Service consider the necessity of limiting work to weekdays given the fact that the Chetco Bar Fire area will most likely see less recreation than usual, so work on the weekend shouldn't impact recreation as much as normal. The way VR-12 and VR-13 are written, they seem to talk about closing recreation sites during holidays or weekends to allow for project operations by purchasers. Please reword VR-12 and VR-13 if you mean to say something different. If not, then VR-14 is contradictory to VR-12 and VR-13.

VR-26 & VR-17: These can be combined.

VR-30: This can be combined with R-1.

VR-33: This should be a non-issue. Purchasers and operators are the public too. They should not get special treatment but should be able to use the facilities like everyone else. They should be allowed to use all facilities unless closed. If they are closed, then yes, they should get permission to have them open and use them.

IV-2, IV-4, IV-5, and SIL-3: Please consider combining all these criteria. They all discuss cleaning equipment.

F-1: This is inconsistent with VR-1. Please indicate if VR-1 is a slash disposal zone and the rest of the unit must be below 3ft. or if something else is proposed.

Scale

Again, we would like to remind the Forest Service to consider the scale of this salvage project when considering the deferral of salvage acres due to considerations such as wildlife habitat. There will be 166,231 acres of burnt forest un-touched by salvage operations following completion of this project if the Proposed Action is chosen and a whopping 168,453 acres of burnt forest un-touched by salvage operations following completion of this project if Alternative 3 is chosen. We would like the Forest Service to strongly consider the proportions of this project when considering setting aside additional acres of burnt forest for wildlife habitat.

Final Thoughts

AFRC would like to see all timber sales be economically viable. Our membership depends on sawlog volume to keep their mills running and employees working. In addition to volume, AFRC also believes in the importance of the value of these timber sales. It's the value of these sales that will generate income to the counties. Supporting local mills and generating funds to support local government should be a primary goal for all timber sales on federal lands that return receipts to the counties, and we would like the Forest Service to recognize this goal and keep it in mind while laying out the timber sale that this EA generates. Appropriate harvesting systems should be used to achieve an economically viable sale in order to meet this objective. We would like to see flexibility in the contract to allow a variety of equipment access 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 bidders, thus driving the bid value down. Including language in the contract that specifies damage tolerance levels rather than firm restrictions gives the operator flexibility to utilize their equipment to its maximum efficiencies. For example, quantifying a residual stand damage threshold rather than entirely restricting activity during certain months (or restricting log lengths) will allow an operator the flexibility to alter their yarding techniques to meet the threshold throughout the seasons instead of having to completely shut down during certain months. Though some of the proposal area will be planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest.

We would like the Forest Service to keep safety and logging feasibility at the forefront of their analysis and implementation. As described in the scoping notice, portions of the area salvage stands will be retained. You will also likely be required to retain green trees within project units. Such a design can be problematic from a logging standpoint if not implemented carefully. Large clumps of retention trees in certain locations can make yarding, particularly cable yarding,

difficult or dangerous by creating blind leads or forcing cable roads to be re-aligned to non-desirable locations such as through draws or side-hilled. We would like the Forest Service to develop a logging plan early in the planning process so that the retention tree layout can be designed with it in mind in order to balance the need for economical timber sales with the need for retention of key structural elements in salvage harvest units.

AFRC is happy to be involved in the planning, development, and decision-making process for the Chetco Bar Fire Salvage Project. Should you have any questions regarding the above comments, please contact me at my office: 541-342-1892, my work cell: 541-517-8573, or aastor@amforest.org.

Sincerely,

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