



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

December 20, 2018

Emigrant Ranger District  
c/o Lori Bailey  
265 Hwy 20 South  
Hines, OR 97738

Dear Lori:

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

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 Malheur National Forest and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon forest sector employs approximately 61,000, 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 supports hazardous fuels reduction projects prepared under guidelines contained in the Healthy Forests Restoration Act (HFRA). This tool has been underutilized in eastern Oregon. AFRC has the following comments on Rattlesnake.

Table 1 in the scoping letter indicates that 32,235 acres of the Rattlesnake 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." While we recognize that HFRA projects are focused on and designed for fuels reduction, the Purpose and Need for this project should reflect managing for timber production and multiple use 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. 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. The treatments on the Rattlesnake project will likely provide short-term products for the local industry and we want to ensure that this provision is an important consideration for the decisionmaker as the project progresses. As we will discuss later in this letter the importance of our members' ability to harvest and remove these timber products from the timber sales generated off this project is paramount. We would like the Forest Service to recognize this importance by **adding economic viability & support to the local infrastructure to the purpose and need** of the Rattlesnake project. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on National Forest System lands.

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 Rattlesnake 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 December 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 Rattlesnake 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 Rattlesnake may make the 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 Rattlesnake 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 Rattlesnake 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

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

The Rattlesnake 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 “skips and gaps” 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. AFRC requests that the Emigrant District utilize this concept in Rattlesnake.

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 Rattlesnake 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.

AFRC fully supports utilizing forest plan amendments when appropriate. In addition to the potential forest plan amendments for removing trees greater than 21 at diameter breast height AFRC requests that a forest plan amendment for ground based equipment to operate on slopes greater than 35 percent when appropriate.

AFRC does not support publishing of actual design criteria and “best management practices” (BMPs) in NEPA analysis documents. Please remove this detailed and superfluous information and incorporate by reference.

I look forward to the next steps in the planning process on the Rattlesnake 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,

A handwritten signature in cursive script that reads "Irene K. Jerome".

Irene K. Jerome  
AFRC Consultant  
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John Day, OR 97845