Via Email: comments-pacificnorthwest-wallowa-whitman-whitmanunit@fs.fed.us.

March 27, 2019

Kendall Cikanek, District Ranger
Whitman District
1550 Dewey Ave, Suite A
Baker City, OR 97814

Dear Mr. Cikanek:

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

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 Wallowa Whitman 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 landscape scale projects in eastern Oregon. AFRC has the following comments on Patrick.

AFRC strongly encourages treating as many acres as possible within the Patrick planning area. 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 Patrick 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

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importance by revising ***Purpose and Need 4*** **to** include**:** ***and retain existing forest products infrastructure.***" As you know, the milling infrastructure in Baker County has already been lost. Regionally there is still milling infrastructure in Union, Wallowa Whitman and Grant counties and these facilities are heavily dependent on public timber off the Wallowa Whitman National Forest.

We urge the Wallowa Whitman to look for ways to maximize treatment where it is proposed and to avoid deferring units or setting aside portions of units for what is often referred to as "skips" (please consider the fact that there will be acres in the project area that will essentially be "skipped"). Skips within the watershed are plentiful, what is not plentiful are openings. Further, based on observations from various Forest Service personnel and industry around eastern Oregon, it appears that wildlife are not utilizing the skips and adequate areas for cover are already available along riparian areas and near project units to meet this need. If the Wallowa Whitman truly wants to diversify the landscape, then the focus should be on creating openings in the forest and minimizing untreated areas within the Patrick planning area.

AFRC strongly encourages aggressive treatment in the dry upland forest vegetation group and a forest plan amendment to remove trees greater than 21 inches at dbh if this is needed to meet objectives and to adequately treat these stands. AFRC is aware that the Snow Basin decision rejected site-specific amendments because of a lack of unique site characteristics. However, the Snow Basin decision **recognized that the combination of unique site characteristics and Forest Service expertise would be sufficient for site-specific amendments to be upheld.** The proposed action generally identifies locations and design criteria for treatments, but doesn't identify current and projected post treatment tree stocking density or estimated average volume per acre. Overly conservative thinning prescriptions which result in low volumes per acres or too much nonsaw often do little to improve forest health while reducing the economic viability/desirability of projects.

It appears from Table 6 that "thin from below and group selection" will take place in all vegetation group types which is appropriate. Is the goal to move these acres toward the Old Forest Single Stratum structure (OFSS)? Will openings be created to increase Stand Initiation (SI) structure? AFRC does not support leaving all "old" trees (defined by the Forest Service as greater than 150 years) regardless of size. These "old" trees are often trees that were suppressed.

AFRC questions the silviculture prescription and justification for the post and pole areas. Given that lodgepole pine establishes in even aged patches as a result of disturbance, often over very large areas as the result of wildfire, why is a prescription to "reduce stocking levels and increase variability of age classes as well as species diversity" proposed? Is the proposal to selectively remove the lodgepole diameter classes that can be utilized for post and pole removal? On some forests, such as the Fremont-Winema for example, forest silviculture personnel have learned from experience that creating openings from 1 to 5 acres in lodgepole pine stands does not achieve objectives. On the Chemult District openings of this size resulted in lodgepole re-establishing at extremely high densities, taking all available growing space then growing out and eventually breaking down the surrounding stands. Small openings let in wind and snowbreak is exacerbated. Please contact fellow silviculture professionals in eastern Oregon and Washington for information exchange and lessons learned while working in lodgepole stands. And clarify

the objectives in treating these areas – are you attempting to eventually convert these stands to other species?

AFRC supports treatment in Old Forest Multi-stratum (OFMS) stands. Please review these stands and treat more than 2,564 acres (approximately 40 percent) if at all possible. As you know, acres of OFMS that aren't treated at this time will continue to decline due to encroachment by juniper and establishment of other undesirable conifer species. The risk of high severity fire will continue to increase that may result in complete loss of the remaining 60 percent of OFMS in the Patrick planning area.

AFRC does not support limiting treatments in Old Forest Preservation Stands to non-commercial thinning and prescribed burning only. How will these two treatments adequately reduce fuel loads and increase resiliency to fire? Commercial thinning can be implemented carefully by numerous methods that would result in adequately meeting objectives and would extend the life of these stands into the future.

AFRC requests that the Wallowa Whitman intensively manage plantations in the 20,005 acres of pre-commercial in the Patrick project area, to provide wood products for future generations. Current forest management practices on the Wallowa Whitman do not reflect requirements from the National Forest Management Act (NFMA). NFMA was enacted in response to court decisions that ongoing forest management was limited by the Organic Act. The Multiple Use Sustained Yield Act (MUSYA) had carried forward the Organic Act's direction that forests were to be managed for "preserving the living and growing timber and promoting the younger growth."[1] MUSYA confirmed that National Forests are to be managed for "timber" as well as other uses. 16 U.S.C. § 528. It reaffirmed the Organic Act's purpose "to furnish a continuous supply of timber for the use and necessities of citizens of the United States." 16 U.S.C.A. § 475.

The "younger growth" language from the Organic Act was ruled to restrict certain types of management. NFMA adopted a more balanced approach, amending the language of the Organic Act that directed "promoting the younger growth" to NFMA Sec. 6(m)(1), 16 U.S.C. 1604(m)(1): "prior to harvest, stands of trees throughout the National Forest System shall generally have reached the culmination of mean annual increment of growth[.]" In eastern Oregon that culmination occurs at about 100 to 120 years. If the Forest is not intensively managing its plantations, it is not furnishing a continuous supply of timber, nor is it promoting younger growth that has been part of forest policy from the beginning. AFRC requests that the environmental assessment describes how the proposed action will meet the requirements of NFMA stated above.

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 Patrick 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

[1] (USFS Organic Act, Act of June 4, 1897, 55 Cong. ch. 2, § 1, 30 Stat. 11, 35).

a very limited basis, will greatly improve the economic viability of the Patrick 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.

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.

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 environmental assessment to allow for commercial removal of juniper.

The scoping package for Patrick 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 Wallowa Whitman timber staff to find suitable alternatives that meet restoration objectives, for working on steeper ground.

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 the ability 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. 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, both during planning and implementation, will provide the best opportunities for meeting restoration objectives that are economically viable. It is also critical to recognize the difference between "maximizing economic returns" and ensuring "economic viability." AFRC is committed to working with the Forest Service to help all personnel understand that distinction. Logging contractors must average 10 months of work per year in order to be profitable and developing the Patrick proposal with this in mind is critical.

The Patrick project proposes to implement prescribed burning, which includes under burning over large areas, over much of the planning area. Given the number of both imposed and natural restrictions landscape type 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.

The Patrick scoping proposal makes no mention of permanently decommissioning any roads. AFRC does not support permanent decommissioning of roads that are already established however, we are well aware of the need to limit access in many areas. 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 always be considered.

Carbon sequestration as it relates to climate change is a topic that often gets broadly analyzed in NEPA documents. The analysis that the Forest Service will likely be conducting through the ensuing environmental analysis will discuss forest health benefits, effects on carbon sequestration and storage potential and meeting the purpose and need all within the context of an economically viable timber sale. Patrick consists of a variety of treatments, including precommercial and commercial thinning, which may affect the treated stands ability to resist, respond, or be resilient to climate change in the project area. The direct, indirect, and cumulative effects of carbon sequestration and storage and its relationship to climate change in regard to this project must be viewed at much larger scales than the general project area because the scientific literature regarding these, only support analysis on larger scales. There is a large body of literature on management strategies that have the greatest carbon sequestration benefit. In general, actively managing the forest will produce a positive net increase in carbon sequestration thus a positive benefit to reducing anthropogenic effects on climate change (IPCC, 2007). AFRC urges you to analyze the type of treatments being proposed and determine through the literature how they will affect carbon sequestration potential through time.

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

Irene K. Jerome

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