



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

May 23, 2019

Heather Berg, District Ranger  
Klamath Ranger District  
Fremont-Winema National Forest  
2819 Dahlia Street, Suite A  
Klamath Falls, OR 97601

Dear Heather:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Lake of the Woods Vegetation and Fuels Management Project (LOW Project). The LOW Project is approximately 850 acres and includes the land immediately adjacent and encircling (but not including) Lake of the Woods. The area is located on the Klamath Ranger District, Fremont-Winema National Forest, approximately 35 miles northwest of the City of Klamath Falls in Section 34 of T36S, R05E, and Sections 2, 3, 4, 10, 11, 14, 15, 22 of T37S, R05E, W.M., Klamath County, Oregon. This area is a very important and popular to the residents of the area, to the public and to AFRC members.

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 Fremont-Winema 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 fully supports the purpose and need for the LOW Project. Given the current condition of the forests and forest landscape in the LOW Project, AFRC suggests that a more forceful description of the *need* for treatment would be appropriate. "Public health and safety"

in the LOW Project is a need to **protect human life**, health and safety. Individuals recreating in the LOW vicinity are at serious risk from the decadent state of the forested areas due numerous hazards such as falling limbs, rotten trees and snags and from wildfire. Fuels in the area, standing, dead and down are so dense that both the public and firefighter safety is potentially an issue. In the developed areas around the lake, the structures significantly complicate firefighting efforts.

AFRC recognizes that this is a recreation area and that the production of forest products is not the focus of the LOW Project. However, it is critical that the area be treated aggressively enough to adequately reduce the hazard and to leave the treated acres in a condition that is desirable in the future. The scoping notice indicates that past hazard tree projects failed to achieve these desired conditions. It reads that: "trees that were identified as hazards were cut down and left in place with minimal slash clean up or removal. This has resulted in areas within LOW with heavy concentrations of downed logs and woody debris that could be fuel in a wildfire situation." We hope that the Forest does not replicate this flawed approach under this proposal and instead removes the felled hazard trees and sells those with value to the local timber products industry. It is possible that by-products from the treatment may be utilized to pay for the some of the fuels reduction and forest health treatments on the project.


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I look forward to the next steps in the planning process on the LOW Project, which has the potential to provide significant ecological, social and economic benefits to the local area and to the region. Please feel free to contact me if I can assist you with this project.

Sincerely,



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