



Via: comments-pacificnorthwest-fremont-silverlake@fs.fed.us

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Barry Imler, Forest Supervisor
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1301 South G St
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Dear Barry:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Thomas Creek Landscape Restoration Project (Thomas Creek) draft environmental assessment (DEA). Thomas Creek is located on the Lakeview, Paisley and Bly Ranger Districts of the Fremont-Winema National Forest in Lake County, Oregon. The Thomas Creek planning area encompasses approximately 104,000 acres and will implement approximately 95,000 acres of vegetation and fuels treatments. This area is a very important and popular to the residents of the area 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 supports landscape scale projects in eastern Oregon. AFRC has the following comments on Thomas Creek DEA.

Purpose and Need

Our members depend on a predictable and economical supply of timber products off Forest Service lands to run their businesses and to provide useful wood products to the American public. The treatments on the Thomas Creek 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 decision maker 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 a statement to the purpose and need in Thomas Creek to clearly articulate the importance of **contributing to economic viability and support to the local infrastructure**. Landscape scale restoration projects, such as Thomas Creek, still rely on a viable forest products infrastructure to help pay for projects and to remove some of the millions of tons of material that are generated by these projects.

Supporting and retaining local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service land, particularly those lands designated as General Forest as allocated and defined by the Fremont Forest Land and Resource Management Plan (LRMP). The consideration of active management on every acre of appropriate land, regardless of its land allocation, is important to our membership as each year's timber sale program is a function of the treatment of aggregate forested stands across the landscape.

NEPA is a procedural statute. It requires only that environmental consequences of an action be analyzed and disclosed. A project designed to produce timber production is entirely consistent with NEPA.

Forest Plan Amendments

AFRC supports project specific forest plan amendments as appropriate including treatments in aspen clones, riparian reserves, and Late and Old Structure (LOS) stands and removal of trees greater than 21 inches at DBH regardless of species.

Vegetation Management

AFRC requests that the Fremont-Winema intensively manage plantations in the Thomas Creek project area to provide wood products for future generations. Current forest management practices on the Fremont-Winema 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

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

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 describe how the proposed action will meet the requirements of NFMA stated above.

The Thomas Creek DEA states “Forest restoration and fuel reduction treatments would include a mix of large and small tree thinning, prescribed fire, and other fuel treatments. The use of different methods would be determined by site conditions, accessibility and specific resource protection needs. Common objectives in forested stands are to reduce the risk of stand replacing fire and susceptibility to mortality from drought and insects, protect and release large, old trees from competition, enhance aspen, mountain mahogany, and whitebark pine that occur in stands, reduce expanding juniper while maintaining or improving understory composition, and promote resilience on the landscape while maintaining or enhancing heterogeneity at multiple scales.” (p. 10). While AFRC fully supports this overall concept and appreciates the reference to utilization of different methods based on site specific conditions, we do not support rigid requirements such as forest plan amendments that only allow the removal of “white fir greater than 21 inches at DBH.” Site specific conditions may dictate the need to remove ponderosa pine or other species greater than 21 inches at DBH to adequately meet objectives. And, requiring that all white fir greater than 38 inches at DBH be left, may be counterproductive to meeting the larger objectives on the site. AFRC requests that the project specific Forest Plan amendment to allow removal of 21 inches at DBH be broadened to include all species as site conditions require to meet objectives and that the arbitrary requirement to “leave all white fir greater than 38 inches at DBH” be removed.

The Thomas Creek DEA discusses the need to reestablish spatial heterogeneity in the Thomas Creek project by implementing a variable density thinning approach, leaving retention patches, and creating openings. Site specific conditions and flexibility in prescriptions and administration on the ground will be instrumental in meeting this objective. Overly specific silviculture prescriptions for individuals, clumps, and openings (ICOs) will be counterproductive and expensive and ultimately will not meet the objective. Further, it is not clear if the ICO concept will be unilaterally applied to slopes greater than 35 percent where cable logging may be necessary. While applying the concept on steeper ground is not impossible, it does require a maximum amount of flexibility at the contractual level so logging contractors can meet contract obligations in a feasible and economically viable fashion. Please work closely with industry when designing individual projects.

A field trip in May 2018 to the Thomas Creek project area with industry and two representatives from the Lake County Resource Initiative highlighted some of the complexities in working in the moist mixed conifer vegetation type in this area. Moist mixed conifer forests often present challenges in identifying sound trees from defective trees when removing white fir especially in dense stands with larger diameter white fir. A large variability in defect often occurs in the same area. Further, huge amounts of slash and large white fir cull logs have the

potential to damage the residual stand and can create problems with landing size. Larger openings and more group selection should be considered when entering stands of this type.

In order to prepare economically viable timber sales on this area on the Fremont-Winema National Forest, Forest Service staff must be cognizant of the average diameter of trees designated for commercial removal and of the average volume per acre removed. The forest products industry cannot survive (let alone thrive) on enormous volumes of small ponderosa pine and white fir. It is very difficult to create an economically viable product from juvenile ponderosa pine. When average stand diameters for removal of ponderosa pine are less than about 14 inches DBH, economic viability is dubious. Any “biomass” removal should also be designated as “subject to agreement” in the contract. There is not enough value in the material removed to “require” biomass removal. Biomass can be removed if it is economically viable to do so, but requiring removal undercuts the viability of the contract and could result in a lack of bids.

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 which results in the ability to pay higher stumpage rates. The DEA states on page 13 that contingent on specific soil and site conditions mechanical felling and harvesting machines may be used on slopes between 35 and 45 percent “although cable logging with at least one end suspension will be required to yard logs to roadside landings.” This will be extremely helpful in developing economically viable projects.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are rigid operating restrictions. We understand that the Forest Service must take necessary precautions to protect natural resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EAs and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. This includes seasonal operating restrictions around goshawk nests, elk calving areas, etc. During the field trip on May 10, 2018, Dustin DeAtley from Mineral Creek Logging shared that cable logging is expensive and that the equipment costs alone exceed \$2 million. Tethered logging will not work in partial cuts because of the lateral requirements and does not work in areas where there is rock due to safety issues (cable wear and failure) as well as the potential for fire starts. A corridor length of about 1000 feet is maximum with lengths beyond that moving into the intermediate support realm, which is generally not a realistic option in these types of stands. The distance between corridors is critical with 100 – 125 feet being about maximum. Steeper ground also requires more flexibility in crown spacing. On a pie-shaped setting it is possible to go to a 300 foot width at the very back of the settings, however it must be recognized that all trees will be removed from the yarder to a certain distance out on these types of settings. Roads can't be left open to the public with yarder systems in these areas. Buncher cutting and piling small nonsaw in the units is critical. Small material won't stay in chokers and the value of the timber removed in these types of stands doesn't cover the costs. This information will be critical when designing actual projects on the ground.

Aspen Treatments

AFRC fully supports and advocates for activities that restore, promote and maintain aspen stands, however we do not support leaving conifers of any size or age in these areas. Forest Service best available science, which is corroborated by the Rocky Mountain Elk Foundation, calls for removing *all* conifers from these areas. 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. Please refer to Forest Service General Technical Report, PNW-GTR-806, May 2010, Aspen Biology, Community Classification, and Management in the Blue Mountains. The added benefit is that commercial removal of the larger trees, even on a very limited basis, will greatly improve the economic viability of this type of project.

Juniper Woodland, Mountain Mahogany, and Shrubland Treatments

AFRC does not support leaving trees 21 inches at DBH and larger, such as juniper encroaching into pine woodlands or pine in mountain mahogany groves, if the species did not occur on the site historically. While girdling is an alternative if these sites are too removed from equipment to feasibly recover them for what value they may have it should be the last choice.

Roads

The environmental assessment should assess the entire road system within the project area. Once the road system that is needed to implement the proposed action is identified, the roads that are not needed at this time should be ecologically stabilized and considered “closed” rather than formally decommissioning. 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 possible. Furthermore, we would like the Forest Service to provide clear rationale as to why certain roads are proposed for decommissioning. This rationale should include an explanation as to how the Forest determined that the potential resource risk of the road in question outweighs the future access needs that the road provides. This access includes not only vegetation management but also fire suppression and recreation.

Climate Change

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. Thomas Creek 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 regarding 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.

Thank you for the opportunity to provide comments on the Thomas Creek project DEA. I look forward to following the implementation of this project as it moves forward. 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".

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enclosure