



Via Email: [monte.fujishin@usda.gov](mailto:monte.fujishin@usda.gov) and [alison.arnold@usda.gov](mailto:alison.arnold@usda.gov)

June 29, 2019

Monte Fujishin  
Pomeroy District Ranger  
71 West Main St  
Pomeroy, WA 99347

Re: Upper Pataha Project Comments

Dear Monte:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to attend the field trip to the Upper Pataha (UP) project planning area on June 17, 2019 and to provide comments on the UP Categorical Exclusion (CE) pursuant to Section 603, Insect and Disease CE under the 2014 Farm Bill. AFRC strongly supports the use of this tool and is pleased to see the Pomeroy Ranger District (PMRD) actively utilizing it.

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. The Forest Products sector in Washington State continues to provide around 40,000 direct and about 100,000 indirect jobs. Many of these are found in rural communities, such as those adjacent to Pomeroy Ranger District. Wages paid, income taxes, and other monetary transactions generated by these businesses and family-wage jobs substantially contribute to the infrastructure and well-being of the local communities.

AFRC strongly encourages treating as many acres as possible and treatment of the majority of mature timber stands, either through aggressive thinning across all age classes or regeneration harvests, within the UP 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 UP 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 a principal objective to any project proposed on National Forest System (NFS), land particularly those lands designated as commodity emphasis, but also on lands with other designations. Various laws direct and allow the Forest Service to provide a sustainable supply of timber and other forest products from the Nation's forests including the Multiple-Use Sustained Yield Act (MUSYA) of 1960 and the National Forest Management Act (NFMA) of 1976. MUSYA authorizes and directs the Secretary of Agriculture to develop and administer the renewable resources of timber, range water, recreation and wildlife on the national forests for multiple use and sustained yield of the products and services. NFMA is the primary statute governing the administration of national forests and requires the Secretary of Agriculture to assess forest lands, develop a management program based on multiple-use and sustained-yield principles and to implement a resource management plan for each unit of the NFS. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on NFS lands.

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. AFRC supports treating as many acres as possible. We urge the Umatilla 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. If the Umatilla truly wants to diversify the landscape, then the focus should be on creating openings in the forest and minimizing untreated areas within the UP planning area.

The timber products provided by the Forest Service are crucial to the health of our membership and local economy. Without the raw material sold by the Umatilla the mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service lands. To be clear, we are advocating that you consider the economic viability of the project and make sure that it is designed in a way that makes sense for the market. This is not the same thing as maximizing economic value of the project.

AFRC requests that the Forest identify some younger growth stands in UP that can be managed with a focus on growing and sustaining wood fiber for the future. While it is acceptable to manage for different resource benefits in these stands, such as some larger structure, the main emphasis must be growing trees sustainably to harvest and process for future generations.

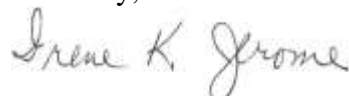
Logging contractors must average 10 months of work per year in order to be profitable. Developing the UP proposal with that in mind is critical. AFRC advocates allowing as much flexibility as possible within the contract while still meeting the management goals and guidelines contained in the NEPA document. 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. Allowing for “pre-bunching” to skyline corridors will help with the economic viability of these cable units. As we discussed during the field trip, some of the cable units are very marginal with regard to merchantable volume per acre to be removed and allowing pre-bunching will help significantly with defraying logging costs.

AFRC supports prescribed burning activities but we are concerned that the vast number of acres of existing burn backlog, in combination with new projects, can be accomplished in a timely manner. Please consider some alternative methods for fuel reduction in the UP planning area.

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. UP 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 UP 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,



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