May 17, 2021

Sherri Chambers
Umpqua National Forest
North Umpqua Ranger District
18782 North Umpqua Highway
Glide, OR 97443

In Reply To: Burnt Creek Fire Salvage

Dear Ms. Chambers:

American Forest Resource Council (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 North Umpqua Ranger District 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's forest sector employs approximately 61,000 Oregonians, 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.

Douglas Timber Operators (DTO) is a community-supported forest products organization whose mission is to actively promote timber harvest, reforestation and production of forest products on public and private timberlands. Our membership

includes over 140 forest product manufacturers, loggers, truckers, forest landowners, Indian Tribes, local businesses and individuals. Our members are directly impacted by the economic recovery of federal lands within the Archie Creek Fire, as well as the risk to private lands from future wildfire and insect infestations as a result of failure to remove tens of thousands of acres of dead wood on federal lands.

We're pleased to see that the North Umpqua Ranger District is proposing salvage treatments on lands designated as Matrix that were impacted by the Archie Creek Fire that will likely provide useful timber products to our membership. 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. Salvage treatments in the wake of high severity fire are a critical component of a sustainable timber management paradigm. Lands designated as Matrix are the only portions of the National Forests where such a paradigm is directed, and we hope that the proposed salvage units yield successful timber sales that will help advance this directive.

Due to typical wood deterioration associated with fire-killed trees, successful implementation of timber salvage is largely a function of timing as the risk of value recovery increases the longer dead trees are left standing. Typically, the timeframe for preparation of salvage projects needs to yield sale offerings by early summer of the year following the fire event at the latest. The District's proposed use of a Categorial Exclusion (CE) to comply with NEPA obligations is a prudent approach to meeting the timeline that we estimate are necessary to successfully implement salvage treatments. We also would like to ensure that the Forest Service is proposing salvage on forest stands that contain timber products that will be useful to the local industry. In particular, this entails focusing salvage treatments on mature stands of timber with adequate standing volume to generate interest from purchasers. AFRC and DTO are hopeful that this path will ultimately treat those areas proposed in a manner that will:

- Capture damaged timber resources in a timely manner
- Provide post-treatment conditions where effective reforestation is feasible
- Generate timber sales that are economically viable

SCIENTIFC REVIEW

It is important that the Forest Service consider all available scientific literature related to both action and inaction following wildfire to enable the decision-maker the ability to assess the tradeoffs of a.) conducting timber salvage; and b.) not conducting timber salvage. We would like the Forest Service to review the literature cited below and incorporate its findings into the project record.

Hydrology

Cole RP, Bladon, KD, Wagenbrenner, JW, Coe Drew B.R. Hillslope sediment production after wildfire and post-fire forest management in northern California. *Hydrological Processes.* 2020;1-18

Key points/findings of the Cole paper include:

- Sediment yields two years following the fire event were highest in areas that did ***not*** include timber salvage.
- Sediment yields were lower on areas that were salvaged.
- Post-fire management resulted in lower rates of erosion and sediment delivery.

Niemeyer RJ, Bladon KD, Woodsmith, RD. Long-term hydrological recovery after wildfire and post-fire forest management in the interior Pacific Northwest. *Hydrological Processes.* 2020;1-16.

Key points/findings of the Niemeyer paper include:

- Spikes in streamflow and runoff recovered more quickly on timber salvaged areas than on areas not salvaged.
- Post fire land management strategies, including timber salvage, may have increased the rate of hydrologic recovery in the long term when compared to unmanaged areas.

Robichaud PR, Lewis SA, Brown RE, Bone ED, Brooks ES. Evaluating post-wildfire logging-slash cover treatment to reduce hillslope erosion after salvage logging using ground measurements and remote sensing. *Hydrological Processes.* 2020;1–15.

Key points/findings of the Robichaud paper include:

- Logging slash applied at a rate to achieve a mean ground cover >60% was found to be an effective treatment to reduce post-salvage runoff and soil erosion.

Reforestation

Sessions, J, Bettinger P, Buckman R, Newton M, Hamann J. Hastening the return of Burnt Creek forests following fire; the consequences of delay. *Journal of Forestry*. April/May 2004, pp 38-45.

Key points/findings of the Sessions paper include:

- Timber salvage can assist in the hastening of Burnt Creek mature conifer forests on burnt landscapes.
- Delays in effective timber salvage could destine much of the most intensely burned areas to cycles of shrubs, hardwoods, and recurring fires for many decades.

Hazardous Fuels

Peterson, David W, Dodson, Erich K, Harrod, Richy J. Post-fire logging reduces surface woody fuels up to four decades following wildfire. *Forest Ecology and Management.* 338 (2015) 84-91.

Key points/findings of the Peterson paper include:

- Post fire logging can significantly reduce future surface woody fuel levels in forests regenerating following wildfires.

OPEATIONAL CONSIDERATIONS

The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these 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 land.

Given the economic uncertainty of the viability of the timber sales generated by this project we strongly urge the Forest Service to incorporate project design features permitted by your LRMP that will reduce the level of risk incurred by prospective purchasers. These design features should focus on flexibility in a variety of parameters including utilization specifications, operating restrictions, and equipment use. The timeliness of this salvage is a function of, as we stated earlier, how quickly the CE is completed, and also how quickly a purchaser will be able to start and complete harvest operations. Expedient salvage operations will be partly determined by the "sideboards" imposed by the Forest Service on the associated timber sales. The most impactful sideboards are operating restrictions. Firm operating restrictions are the primary issues affecting the ability of our members to feasibly deliver logs to their mills. This feasibility is further complicated by the nature of salvage sales and the need for expedient harvest and delivery to manufacturing facilities. We urge the Forest Service to explore methods to reduce or eliminate firm operating restrictions and instead rely on actual ground conditions. This includes those restrictions for weather, both during the summer months related to fire risk and the winter months related to soil and water impacts. There are

ways to mitigate the risks to these resources without imposing outright restrictions. Please explore those mitigation measures and incorporate them into the Burnt Creek Salvage project. The maps associated with the scoping notice identify a "wet season" haul restriction. Please consider modifying this to a "wet ***weather***" restriction. Doing so will allow an operator the ability to haul timber during any season as long as the actual weather conditions are permissible.

Standard utilization specifications used on green Forest Service timber sales will not likely be appropriate for the salvage sales generated from this CE. Due to the damaged nature of the timber products being proposed for harvest, there will be an unusually high level of uncertainty by the Forest Service and prospective purchasers of the actual value of those products on the stump prior to harvest. This uncertainly is exacerbated by the fact that additional time for wood deterioration will elapse between the time of purchase and the time of harvest. Therefore, the Forest Service should be ***developing minimum removal requirements and utilization specifications that align with this uncertainly.*** Purchasers will recover as much value from these damaged products as possible. Required them to recover value that is not available will reduce the likelihood that these sales will successfully sell.

There are a variety of operators that work in the North Umpqua market area with a variety of skills and equipment. Developing a contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases, decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest.

Constructing forest roads to facilitate convention yarding systems is critical to developing economically viable salvage sales, and we urge the Forest Service to assess and implement the roads that are needed to access and treat as much as the project area as possible in an economically feasible way, given the road construction limitation

contained in the CE. Proper road design and layout should pose little to no negative impacts on water quality or slope stability. Consistent and steady operation time throughout the year is important for our members not only to supply a steady source of timber for their mills, but also to keep their employees working. These two values are intangible and hard to quantify as dollar figures in a graph or table, but they are important factors to consider. We see that the FS designated certain road segments capable of supporting wet season haul and other not capable. **Please consider allowing a purchaser to rock those roads not capable of supporting wet season haul in order to bring them up to specifications that would allow wet weather haul.**

Another factor contributing to timber sale economic viability is rock source for required and/or optional road work. Costs associated with hauling rock long distances has been escalating in recent years and often represents a significant cost in timber sale implementation for our members. In fact, this spike in cost has recently been identified by several purchasers as a primary contributor to sales going no-bid. **Quarry development (new or existing) on Forest Service land in close proximity to the Burnt Creek Fire Salvage project should be considered if available.** The value of having a good rock source close to future timber sales should be strongly considered by the North Umpqua District.

In conclusion, AFRC and DTO are eager to be involved in the planning and decision-making process for the Burnt Creek Salvage project. Should you have any questions regarding the above comments, please contact Andy Geissler at 541-525-6113 or ageissler@amforest.org; or Matt Hill at matt@dougtimber.org.

Sincerely,

Andy Geissler
Federal Timber Program Director
American Forest Resource Council

Matt Hill
Executive Director
Douglas Timber Operators