



November 16, 2015

Constance Cummins
Forest Supervisor, Fremont-Winema National Forest
c/o Kelly Ware
38500 Highway 97 North
Chiloquin, OR 97624

RE: Lobert Restoration Project – Scoping Comments

VIA: comments-pacificnorthwest-winema-chiloquen@fs.fed.us

Dear Supervisor Cummins,

Thank you for this opportunity to provide scoping comments on the Lobert Restoration Project (Lobert). These comments are on behalf of the members of the American Forest Resource Council (AFRC). AFRC represents forest product businesses and forest landowners in five states. Our mission is to create a favorable operating environment for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving federal laws, regulations, policies and decisions that determine or influence the management of all lands.

My comments are below:

1. The use of soil types to help outline vegetation management areas and opportunities is a good strategy. Please create an alternative that maximizes wood products outputs and an alternative that maximizes acres treated. These may be one and the same.
2. I don't see any mention of a potential forest plan amendment for removing trees greater than 21 inches at diameter breast height (dbh) in the areas subject to the Eastside Screens. Please remove trees greater than 21 inches, such as large white fir, in areas where large legacy ponderosa pine are threatened.
3. The chronic focus by the Forest Service on saving and promoting all "old" trees is a concern. Please consider removing "old" trees, regardless of species, if there is a sound resource reason to do that such as helping to maintain the large legacy ponderosa pine. Some pine that appear to be old very well could have been left during the last entry and in reality are "suppressed". These types of trees help with the economic viability of these projects as well. Further, it appears that future national forest system lands on the dry side

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will be characterized with a “sea of snags” when considering the amount of old trees that are being left, the enormous number of snags, and the large number of acres that have been burned in wildfires over the last couple of decades.

4. Is it really necessary to completely obliterate 162 miles of roads? Are there other means of meeting the objectives? This is an especially critical consideration on steeper ground.
5. Aspen clones are declining throughout the west due to encroachment by conifers and other activities. Restoration of these valuable species is critical. Please be aggressive in your restoration practices and remove conifers, including those trees greater than 21 inches at dbh, in order to adequately shift the survival of the aspen clones. Landscape scale projects are designed to minimize re-entry and it is not efficient or effective, nor is it good for the resource, to leave too much competition in anticipation of returning to remove additional trees in the future.
6. AFRC fully supports working in riparian areas. Please ensure that these treatments are aggressive enough to be meaningful.
7. Prescribed burning is a great tool, however many forests have such an enormous backlog of acres that need to be burned that designating hundreds more acres may not be the best approach. How many acres does the Fremont-Winema burn on average each year? What is the current status of acres that need to be burned?
8. The Lobert project has the potential to be extremely beneficial for a myriad of social, ecological and economic values. Please be as aggressive as possible in treating acres on the ground so that resilience of both the forest, the wood products, and the social sectors are measurably improved.

Thank you for the opportunity to provide comments on Lobert. I look forward to the final environmental document and decision. Please contact me if you have any questions.

Yours truly,



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