



December 5, 2016

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Via Email: comments-pacificnorthwest-umatilla-northfork-johnday@fs.fed.us

Dear Ian and Jeff:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Ten Cent Community Wildfire Protection Project (Ten Cent) Draft Environmental Impact Statement (DEIS).

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. Many of our members have their operations in communities within and adjacent to the Umatilla and Wallowa Whitman National Forests and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC has the following comments on Ten Cent DEIS:

- AFRC appreciates and supports the narrow and focused purpose and need that you have outlined for Ten Cent. We also support the joint work by the two forests on this project as it is these types of efficiencies that are crucial to utilize during these times of reduced and declining budgets.
- Please review the planning area and determine if any additional acres can be treated that would provide additional merchantable sawlogs to help the economics of this very important project. We recognize that this is difficult in this area but increased revenue will assist with increased restoration work on the ground. Also, please make an estimate of the actual merchantable sawtimber volume and separate it from the pulp, poles, biomass and firewood numbers.

- AFRC supports implementing appropriate and focused management treatments in all vegetative cover types including cool moist and cold dry upland forests.
- Supporting development of fire-adapted rural communities is extremely important in the Ten Cent project. There are numerous private inholdings as well as the communities of Granite and Greenhorn within the planning area. The horrific fire seasons the West has experienced over the last number of years emphasize how important it is for all communities to be fire-adapted.
- Is there an opportunity to implement the Good Neighbor Authority (GNA) on the Ten Cent project? Currently the Oregon Department of Forestry (ODF) has a large grant to assist private landowners with fuels reduction on their properties within this area. This may provide an ideal opportunity to utilize the GNA authority. We urge the Forest Service to utilize tools such as Designation by Description (DxD) and Designation by Prescription (DxP) on Ten Cent to assist with reducing implementation costs.
- Other than separating skyline from ground-based equipment, please do not specify actual logging systems in the NEPA document. This practice invariably leads to problems during implementation when alternative logging systems are superior or necessary to accomplish the work. Provide objectives and outcomes for resulting conditions and analyze from there. AFRC is planning a field trip with its members in June 2017 to help identify logging methods that will efficiently and economically remove small material from the Ten Cent project.
- Consider “feathering” the edges of previous harvest areas as well as the corridors along roads and private boundaries for both wildlife and for visual aesthetics.
- AFRC supports restoration treatments in riparian areas. These areas are the most productive and as a result, are also the most resilient. Hardwoods and shrub species are being crowded out by encroaching conifers. Please continue to work in these areas and consider working closer to actual water courses. When riparian areas become overstocked, they are at risk for “chimney” effect fires. Winter logging when soils are frozen is an ideal time to work in these areas. Whether vegetation removed is “commercial” or “noncommercial” should have no bearing on the treatments, rather the prescriptions in the Riparian Conservation Areas should be based on meeting objectives.

I look forward to the Record of Decision on the Ten Cent project which has the potential to provide significant ecological, social and economic benefits to the local area and the region.

Sincerely,



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