



Via Email: comments-pacificnorthwest-malheur-emigrantcreek@fs.fed.us

November 24, 2017

Christy Cheyne, District Ranger
Attn: Lori Bailey
Emigrant Creek Ranger District
265 Highway 20 South
Hines, OR 97738

Dear Christy:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Emigrant Creek Ranger District Danger Tree Removal Project (Emigrant)

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 Malheur National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC supports the concept of the Emigrant project. However, I have grave concerns that this project will be economically viable. There is not enough information in the scoping document to determine what will actually take place on the ground. How many of the danger trees removed will be green? Will any trees greater than 21" at dbh be removed? How close are these trees to each other? How much equipment moving will be required? What type of volume estimates for merchantable saw material is anticipated? Will this be one contract or several contracts?

A certain amount of demand exists for large ponderosa pine with blue stain. However, this market is limited along with the amount of stumpage dollars that will be returned to the government. There are a lot of caveats in this initial document that will essentially limit the viability of the project. Please contact industry as soon as possible and review some areas of this project on the ground. Discuss the economics early and often.

Contractual design and packaging on Flat should be as flexible as possible. It is critical that industry be allowed to develop and provide plans to suitably meet objectives and implement projects to make them more cost effective.

I look forward to the next steps on the Emigrant project, which has the potential to provide social and economic benefits to the local area and the region. Please feel free to contact me if I can assist you with determining the economic feasibility and or logging system requirements.

Sincerely,

A handwritten signature in cursive script that reads "Irene K. Jerome".

Irene K. Jerome
AFRC Consultant
408 SE Hillcrest Rd
John Day, OR 97845

enc