



Via: www.fs.usda.gov/project/?project=45689

July 12, 2018

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

Dear Monte:

Thank you for the opportunity to comment on the Sunrise Vegetation and Fuels Management Project (Sunrise) draft environmental impact statement (DEIS). Sunrise is located on the Pomeroy Ranger District of the Umatilla National Forest in Asotin and Garfield Counties, Washington. The project encompasses approximately 33,150 acres with approximately 32,000 on National Forest System Lands (NFS). This area is a very important and popular to the residents of the area and to American Forest Resource Council (AFRC) members.

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 Umatilla National Forest 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 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.

Purpose and Need

AFRC supports the landscape scale and “all hands all lands approach” for management and supports forest plan amendments, treatments in aspen clones, riparian reserves and Late and Old Structure (LOS) stands. Our members depend on a predictable and economical supply of timber products off Forest Service lands to run their businesses and to provide useful wood products to the American public. The treatments on the Sunrise 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 decision maker 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. 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, particularly those lands designated as timber and range, but also on lands designated as old growth, riparian and winter range.

CFR 40 Chapter V Part 1502.13 states the purpose and need is, "(T)he statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." The current wording of the purpose and need is rambling, confusing and much too long. AFRC requests that the purpose and need for Sunrise be tightened up and streamlined for clarity.

AFRC requests a forest plan amendment to remove trees greater than 21 inches in order to adequately meet the purpose and need of this project. In order to effectively promote early seral species, it is imperative that the seed source be removed from the overstory.

Maximizing Treatment Area

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. Based on the Sunrise DEIS, it appears that the proposed action (Alternative 2) is proposing thinning on approximately 95 percent of the project area, which is outstanding. AFRC would like to see the agency treat a higher proportion of the landscape, and, we urge the Forest Service 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." Skips within these watersheds are plentiful, what is not plentiful are openings. The individual, clumps and openings (ICOs) will develop naturally in a relatively short amount of time without the "over engineering" that is currently taking place with extremely complex marking guides. The introductory pages in the Sunrise DEIS clearly articulate the urgency and need to dramatically reduce the vegetation densities in the project area, primarily to reduce the potential for uncharacteristic wildfire on this landscape, to the benefit of virtually all the resources and values at risk in this area.

Economics and Operating Restrictions

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 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 forestland. 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.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to manage their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EAs, EISs, and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We are glad to see that the Umatilla is shifting their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results. There are a variety of operators that work in the Umatilla market area with a variety of skills and equipment. Developing an EIS and 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. 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 proposed area is planned for skyline harvest, there are opportunities to use certain ground equipment such as feller bunchers and processors in the units to make skyline yarding more efficient. Allowing the use of processors and feller bunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of skyline corridors, reduce damage to the residual stand, and provide a more even distribution of woody debris following harvest. It is absolutely critical that all units that contain skyline yarding be identified as “skyline/tractor” in contracts and be analyzed for both skyline and ground-based logging during the environmental analysis to provide maximum flexibility during implementation. This flexibility allows our members to work with Forest Service personnel to achieve the best environmental results on the ground and will maximize the returns to the agency for timber removed.

Roads

Constructing forest roads is essential if active management is desired, and we are glad that the Forest Service is proposing the roads that are needed to access and treat as much as the project area as possible in an economically feasible way. 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. The ability to yard and haul timber in the winter months will often make the difference between a sale selling and not, and we are glad the Forest Service is working to accommodate this by proposing rock application to roads that include skyline yarding systems.

AFRC urges the Forest Service to utilize existing road beds and closed roads for temporary road construction required to access the Sunrise Project area whenever possible. Generally, we do not support permanently decommissioning roads and removing them from the system as these roads are often necessary for future access and management activities. Utilizing other methods to prohibit use of these roads, such as gates and barriers, is a much better use of limited dollars while providing flexibility for unknown future needs on the landscape. AFRC recognizes that closing roads in this area is extremely difficult because of the flat terrain, which begs the question how will the Forest prevent the public from establishing new roads? Especially after the management of the project is complete and the landscape is much more open.

Riparian Area Treatment

AFRC urges the Forest Service to consider proactive management in riparian reserves/riparian conservation areas. Typically, the overstocked and uniform stand characteristics that exist in the uplands also exist in the riparian areas. It has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of small diameter suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that INFISH mandates should be considered.

Please remove Section 2.4 Project Design Criteria (page 2-39) and place it in the appendices. The information in this section does not belong in the body of the EA. These criteria are standard best management practices and are required on all contracts and fully described therein.

AFRC urges District Ranger Fujishin to select Alternative 2 as the preferred alternative for implementation. Alternative 2 would provide the most log volume for AFRC members and greatest monetary return to the Forest Service. Further, Alternative 2 provides the greatest improvement in Condition Class; improves the most acres of LOS; provides the greatest reduction the project area expected to burn at high intensities; and protects and enhances habitats for wildlife.

Thank you for the opportunity to provide comments on the Sunrise DEIS. I look forward to following the implementation of this project as it moves forward.

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