



September 18, 2019

David Halemeier
District Ranger
Willamette National Forest
Detroit Ranger District
44125 North Santiam Highway
Detroit, OR 97342

In Reply To: Dry Beard EA

Dear Mr. Halemeier:

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 Detroit 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.

AFRC is glad to see the Detroit Ranger District proposing vegetation management on Matrix and Riparian Reserve (RR) lands 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, and we thank the Willamette National Forest for continuing to be a reliable source of these products year after year. We are also glad to see that the District has recognized the importance of the agency providing a sustainable timber supply off Forest Service land by including the provision of that supply in the Purpose & Need for the Dry Beard project. AFRC believes that the provision of useful raw material off National Forest Service land is an integral component of the agency's multiple-use mission. In recent years, many Forest Service Districts have opted to omit the provision of useful raw material from the purpose & need statements of vegetation management projects. AFRC has warned against this practice as it marginalizes the appropriateness of this provision to the agency's mission. Most all Forest Service vegetation management projects achieve an array of positive outcomes. One of these positive outcomes is a sustainable supply of wood products, and we thank the Detroit District for recognizing this in the Dry Beard project.

Since the inception of the Northwest Forest Plan (NWFP) the Willamette National Forest has largely abandoned any level of regeneration harvest on lands designated as Matrix. These Matrix lands are the only designated lands on the Willamette where sustainable timber management may occur. This sustainability is crucially important to AFRC's members and we continuously advocate for forest management that addresses it. The "thinning-only" management paradigm adopted by the Willamette National Forest since the NWFP was signed has provided a short-term supply of timber products, but unfortunately cannot fulfill the sustained long-term supply that we believe the Forest Service is mandated to provide; in other words, the stands suitable for thinning will eventually be depleted. Douglas-fir forests require regeneration harvest at some point in their life-cycle to regenerate. Although the Dry Beard project does not propose such treatments, the small amount of gap creation proposed will at least create some level of early seral habitat and we urge the District to implement those openings to the fullest extent analyzed.

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 EA, it appears that the District is proposing commercial treatment on 10% of the project area, totaling 1,079 acres. This percentage is typical of many Forest Service vegetation management projects and although AFRC would like to see the agency treat a higher proportion of the landscape, we understand the multiple directives and land management restrictions in place that make doing so difficult. Given the relatively small scale at which this project is proposed to be implemented on, we urge the District to fully implement treatment on those 1,079 acres that *were* analyzed and to not defer treatment.

AFRC is glad to see that the Forest Service is being proactive in treating some of the planning area riparian reserves. It has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has no 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. There is a large volume of literature that validates the usefulness of thinning treatments in riparian areas. AFRC provided much of this literature in our scoping comments and we are glad to see the District incorporate much of it in the Dry Beard EA to support the treatments being proposed.

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 forestland.

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 protect 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 EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). The Dry Beard project contains an exceptionally unique set of timing restrictions when compared to the average vegetation management project on the Forest. We understand that the District has interested stakeholders who may be impacted by the implementation of this project and that these impacts are being mitigated by an array of parameters described in Table 13 of the EA. These parameters have the potential to make implementation difficult and costly to our membership. We appreciated the opportunity to provide input on some of these timing restrictions earlier in the NEPA process and would like to make a few additional requests at this time.

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. We are glad to see that District has prepared a document that is permitting the haul of timber products during the winter months. We assure you that this project design will make a huge difference not only to the economic viability of the sales coming off this EA but also to health of our members and those that they contract with.

An intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The 2.6 miles of road decommissioning likely represents a ***permanent*** removal of these roads and likely the deferral of management of those forest stands that they provide access to. Lands designated as Matrix are the only lands where our members can depend upon a long-term supply of timber products. Removal of adequate access to these lands compromises the agency's ability to achieve this long-term supply and is very concerning to us.

Of particular concern to us is the fact that the Detroit District opted to propose decommissioning on road segments in conflict with the recommendations provided in the 2015 Road Investment Strategy (RIS). In particular, the 1000043-45, and 1003480 roads were recommended to either remain stored or remain open by the RIS. We understand that the RIS merely provided "recommendations" and that site-specific information should be used to make final decisions. However, the RIS does indicate that "the recommendations in this Strategy will play a critical role in helping inform any NEPA process that includes road management. Ultimately, we feel that, given the RIS recommendations, the Dry Beard EA does not provide sufficient rationale to justify the decommissioning of these road segments. The Road Investment Strategy directs the agency to analyze roads for decommissioning where *"the resource risk from these roads potentially outweighs the access value and the road is very unlikely to be needed for administrative use in the future."* The Strategy also directs the agency to analyze roads for closure where *"the resource risk from these roads potentially outweighs the access value, but the road may be needed for administrative use in the future."*

We could not locate a substantive discussion in the EA that describes exactly how the IDT:

1. Determined that these two road segments are “not needed for future timber needs.”
2. Determined that the resource risk outweighed the access value (for timber management and other resource needs).
3. Used the RIS recommendations and additional information gathered during the project specific interdisciplinary analysis, as described on page 142 of the EA.

Pages 125 and 126 indicates that the ID team analyzed each road segment for future use and resource risk, but did not provide a description of how those risks were weighed against both the RIS recommendations and the potential access value.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision-making process for the Dry Beard EA. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or ageissler@amforest.org.

Sincerely,

Andy Geissler
Federal Timber Program Director
American Forest Resource Council