



March 13, 2020

Darren Cross
McKenzie River Ranger District
57600 Highway 126
McKenzie River, OR 97413

In Reply To: Flat Country DEIS

Dear Mr. Cross:

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 McKenzie River 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 McKenzie River RD proposing vegetation management treatments on their Matrix, Inventoried Roadless Area, and Riparian Reserve Land Allocations that strives to provide a sustainable and reliable supply of timber products in an economically viable manner. The long term sustainability of these timber products are crucial for the long term viability of our membership and the communities they support, and the Matrix land allocation is the only portion of the National Forest System where

timber management under the principles of sustained yield can be relied upon. We appreciate the McKenzie River RD proposing treatments that will yield wood products our members can utilize, as well as treatments that will address the sustainability of the timber resources by implementing regeneration harvest. We also applaud the McKenzie River Ranger District for being one of the first and only districts in western Oregon to see the shortcomings of the current “thinning only” management paradigm that has dominated the Forest Service’s vegetation management program in the Pacific Northwest for decades by breaking out of that mold and prescribing regeneration harvest. Opponents of this type of treatment will likely accuse the District of “going backwards” to management styles of prior years. However, AFRC knows that the District is actually blazing a path *forward* to inform other Region 6 Forests how to fully implement the *current* land management plans that simply were never implemented since their inception. Finding creative ways to integrate sustainable timber management needs with the plethora of other resource needs is forward thinking indeed.

We are glad to see a purpose & need that clearly describes the statutory direction that the USFS is under that requires timber resources to be managed in a sustainable manner. **Based on fundamental forestry principles and the ecology of Douglas-fir forests, it is impossible to manage timber resources sustainably in this region in the absence of regeneration harvest.** The Forest Service cannot thin forever. Ultimately the Forest Service will run out of stands to thin, and by that point the forest age-class distribution will be far out of balance to the point where the reliability and sustainability of its timber supplies will be compromised.

AFRC would like to encourage the District to select and implement the Action Alternative that best meets the described project purpose and need. We believe that optimal attainment of the purpose and need is realized by implementing treatments and activities that address each project component to the maximum extent possible. For example, attainment of the purpose of improving stand conditions is better achieved by applying variable density thinning treatments to 500 acres of forest land as opposed to 400 acres of forest land. Treating 400 acres meets the purpose and need—but not to the same level that treating 500 acres would. Furthermore, we believe the selected alternative should also meet *each* of the described project purposes; this includes 1.) providing a sustainable supply of timber products; 2.) improving stand conditions in terms of density, diversity, and structure; 3.) increasing vegetative habitat complexity and hardwood composition along streams; and 4.) sustainably managing the network of roads in the project area. **We believe that, based on the substance of the EIS, only Alternative 2 meets each of the described purposes.** Alternative 3, which was developed in response to public stakeholders requesting that the project “refrain from regeneration harvest” and “refrain from harvesting older stands”, clearly does not meet

the purpose of “providing a sustainable supply of timber products.” Page 63 of the EIS describes which project purposes will be met with each type of treatment. Here, the EIS describes that only the regeneration harvest treatments will meet the purpose of sustainable timber provision. **Selection of any element of alternative 3 would retard the Forest’s ability to meet the entire purpose and need to its maximum extent.**

During the scoping phase, AFRC requested that the District consider regeneration harvest in Matrix lands with an overlay of spotted owl Critical Habitat (CHU). In describing why this proposal was not considered the District states on Page 40 of the EIS that “while the final CHU designation does give flexibility to achieve the project’s purpose and need within CHUs, its primary purpose is to protect and improve existing habitat within the CHU.” AFRC would like the District to articulate and characterize the intent and the relevance of the CHU appropriately. The intent, as it was written, of the CHU was not to prohibit regeneration harvest or to establish treatment thresholds across all 9 million acres of the Unit. Nor did the CHU in any way modify the Forest’s existing LRMP. In fact, the Fish & Wildlife Service was explicit in prescribing the opposite:

- **We recognize that ecological restoration is not the management goal on all NWFP land use allocations (e.g. matrix) within designated critical habitat, and we provide a discussion of options land managers could consider to tailor traditional forest management activities on these lands to be consistent with conservation of current and future NSO habitat (pg. 27).**
- **On Matrix lands under the NWFP where land managers have a range of management goals, the Service anticipates that not all forest management projects in critical habitat will be focused on the development or conservation of northern spotted owl habitat (pg. 283).**
- **Targeted variable-retention harvest could be considered where the conservation of complex early seral forest habitat is a management goal (pg. 284).**

We are concerned that, based on the Flat Country EIS, the District is conflating CHU **goals** with LRMP **direction**. The CHU did not replace the LRMP direction in Matrix land to manage for a sustainable supply of timber products. At most, the CHU altered the path appropriate for the District to take in order to meet this direction. Please consider this perspective of the relationship between LRMP direction and the CHU on future projects by pursuing regeneration harvest within this Unit.

AFRC is glad to see that the Forest Service is taking a proactive approach to treating riparian reserves. After visiting several stands proposed for treatment it’s clear that the undesired forest conditions (overly dense and uniform stands) that exist in the uplands also exist in the riparian reserves. The forest health benefits that you expect to

attain through upland thinning treatments can therefore also be achieved in riparian areas with similar active management prescriptions, and so we urge the Forest Service to strive toward maximizing the acres of riparian reserve treated to meet those objectives. It has been well documented that thinning in dense, uniform forest stands accelerates the stand's trajectory to produce large conifer trees, vertical diversity, and tree-species diversity (Garman, Steven L.; Cissel, John H.; Mayo, James H. 2003.); all characteristics that we assume are desirable in riparian areas as much as they are desirable in the uplands. We are also glad to see that the District took a hard look at each riparian area to determine the need for treatment rather than utilizing arbitrary thresholds, such as stand age, as a proxy for treatment needs. However, we would like to revisit certain stands where riparian treatment has been deferred, however, snow levels at the moment limit our ability to do so. We hope to make these site visits in the near future when access is more favorable and hope to have the opportunity to bring any ensuing questions or thoughts to the District.

Table 33 on page 121 of the EIS outlines the buffers being applied to each stream type in the project area. These buffers limit timber harvest activities as well as equipment use. Given these generous buffers we are surprised to see that the project is expected to have adverse effects on threatened fish species. The EIS only describes thinning activities on 164 acres of riparian reserve land. None of these thinning acres will come within 30 feet of a stream channel. The EIS also outlines project design features associated with road management and timber haul that strive to minimize sedimentation. Yet the EIS still anticipates an annual "16-24 percent increase contribution of sediment." The EIS also states that this increase occurs "during harvest activities." AFRC would like the District to clarify what is meant by harvest activities here. Do harvest activities refer primarily to timber haul on rocky roads? If so, it may be useful to distinguish this activity from "harvest activity" which we believe to encompass timber falling and yarding—activities which, given the stream buffers described above, should not be contributing to sedimentation. Regardless, we would like to gain a better understanding of how these high sediment increases were calculated.

We are also confused regarding what thresholds were used to determine negative effects to threatened fish species in terms of timber harvest. Page 109 of the EIS states that "all fish species in the project area would be subject to negative effects of thinning in the riparian reserves by removing about 10 percent of the woody material supply that could be delivered to fish-bearing streams." Table 33 on page 121 describes that fish bearing streams (class 1 & 2) would receive, at minimum, 75 foot no-cut buffers. Appendix G describes in detail the riparian buffers implemented for each unit. We count only one unit that thins adjacent to a fish bearing stream with a buffer less than 120 feet—this is unit 1350, which proposes a 75 foot buffer on a class 2 stream. Appendix C

describes unit 1350 as treating 4 acres of a 42 year old stand in the riparian reserve. Stand data provided by District staff indicates that unit 1350 has an average tree height of 102 feet. **So, the Forest Service has determined that the removal of 102-foot tall trees on 4 acres with a 75-foot buffer represents a deficient level of in-stream wood warranting a determination of “adverse effects” to fish species?** This seems to be an extreme determination and we would like an opportunity to discuss with the ID team to gain a better understanding.

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). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, **describe what you would like the end result to be rather than prescribing how to get there.** There are a variety of operators that work in the McKenzie River market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. It appears, based on the PDF supplement to the PA, that the District is striving toward such an EA focused on flexibility and end-results as opposed to one that imposes firm non site-specific requirements. We appreciate this approach and urge the District to maintain this level of flexibility through the EA development.

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 hope that the District is working to accommodate this. This is particularly critical when offering timber sales that include a component of helicopter yarding. Securing helicopters in the summer months is extremely difficult for our membership, primarily due to competing needs for fire suppression. **Ensuring that roads that access helicopter units are rocked to permit wet season hauling is critical to the successful implementation of those units.**

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 14.8 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.

Recommendations provided in the Road Investment Strategy (RIS) will likely be a starting point for the District to consider road infrastructure needs. The RIS 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 would like the District to carefully consider the follow three factors when making a decision to decommission any road in the project area:

1. Determination of any potential resource risk related to a road segment
2. Determination of the access value provided by a road segment
3. Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning. Due to snow levels in the project area, we are unable to fully assess the suite of roads proposed for decommissioning at this time. However, we hope to have a chance to visit certain segments in the forthcoming months and would like the opportunity to provide the District with feedback at that time.

AFRC is happy to be involved in the planning, Environmental Impact Statement, and decision-making process for the Flat Country project. 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 Manager
American Forest Resource Council