



Via: <https://cara.ecosystem-management.org/Public//CommentInput?Project=58081>

January 25, 2021

Slater Turner, District Ranger
Lookout Mountain Ranger District
3160 NE 3rd St
Prineville, OR 97754

Dear Slater:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Mill Creek Dry Forest Restoration Project (Mill Creek). Mill Creek is located on the Lookout Mountain Ranger District of the Ochoco National Forest approximately 23 miles east of Prineville, Oregon, adjacent to the Mill Creek Wilderness. The project area encompasses approximately 36,485 acres and proposes a variety of resource treatments on 23,015 acres including 7,282 acres of commercial thinning that will produce merchantable timber for AFRC members and will contribute to the local economy. This area is very important and popular to the residents of the area and 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 Ochoco 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. 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.

Purpose & Need—General Forest and General Forest Winter Range

AFRC strongly encourages treating as many acres as possible and treatment of the majority of mature timber stands, either through aggressive thinning across all age classes or small acreage regeneration harvests within the Mill Creek planning area. 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. The treatments on the Mill Creek 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. 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. 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 and a principal objective to any project proposed on National Forest System (NFS) land, particularly those lands designated as commodity emphasis, but also on lands with other designations. Various laws direct and allow the Forest Service to provide a sustainable supply of timber and other forest products from the Nation's forests including the Multiple-Use Sustained Yield Act (MUSYA) of 1960 and the National Forest Management Act (NFMA) of 1976. The MUSYA authorizes and directs the Secretary of Agriculture to develop and administer the renewable resources of timber, range water, recreation and wildlife on the national forests for multiple use and sustained yield of the products and services. NFMA is the primary statute governing the administration of national forests. This Act requires the Secretary of Agriculture to assess forest lands, develop a management program based on multiple-use and sustained-yield principles and to implement a resource management plan for each unit of the NFS. 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.

AFRC would like to emphasize how deeply interconnected the different resource areas are and how that should be considered during the data gathering stage when prepping for NEPA. This interconnection should continue through the NEPA and planning stages and through implementation of contracts for timber sales, stewardship contracts, service work contracts etc. Forest Service employees should not feel they only have ownership in one or the other. There is no "side" when it comes to large landscape level treatments. Each discipline is making investments now for an even stronger outcome in the future. Decreasing the gap between NEPA/Planning and the realities of implementation and the true resources it takes to successfully treat large landscapes must be a major goal on all landscape level projects. This strategy will help streamline NEPA analysis and decisions and gain full alignment with implementable on the ground projects. A good understanding of NEPA to implementation "handoff" and considerations of available treatment options (i.e. logging systems & available equipment) will create an understanding of treatment tools and method strengths and limitations will precipitate and influence focused interdisciplinary team discussions and help streamline NEPA analysis and decisions.

AFRC is glad to see the Lookout Mountain Ranger District proposing vegetation management on their lands, including in Riparian Habitat Conservation Areas (RHCAs), 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. This supply is important for present day needs but also important for needs in the future. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments affect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times

regarding the long-term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. Lands designated as General Forest and Range are the only lands where our members can depend on a sustainable supply of timber products, as timber outputs on lands with other designations are merely a “byproduct.” Therefore, we would like the Lookout Mountain District to recognize the importance of this supply by **including the provision of timber products into the Mill Creek project’s purpose & need**. AFRC believes that the Forest Service should take pride in the fact that they provide a crucial renewable resource to the public that they serve. We understand that every treatment proposed on this project will likely be designed to meet numerous objectives, but why can’t one of those objectives, particularly on lands designated as General Forest and Range, be the provision of timber products?

Technical reports from both 2010¹ and 2012² completed for the Forest Service determined, among other things, that:

- The forest products sector helps sustain the social, economic, and ecological benefits of forestry in the United States.
- Product revenues sustain economic benefits that include jobs and income.
- Ecological and social benefits can be supported by timber revenue to landowners that help keep land in forests and by forest treatments that can help maintain ecological functions.
- Wood products fulfill fundamental needs per capita and have remained competitive with alternate means of meeting those needs.
- US lumber production and demand is expected to increase through 2040.

Purpose & Need – Eastside Screens

AFRC supports the elements of the purpose and need regarding the improvements to forest structural diversity and fuels reduction. AFRC supports treatments in aspen clones, riparian habitat conservation areas and Late and Old Structure (LOS) stands as well as removing trees greater than 21 inches and trees greater than 150 years old if project objectives and site specific conditions on the ground warrant those decisions. Firm predetermined parameters, such as those imposed the Screens, often limit the ability of local staff in meeting their desired outcomes on the ground. The “one size fits all” notion that these Screens are grounded in is flawed. AFRC is aware that the Snow Basin decision rejected site-specific amendments because of a lack of unique site characteristics. However, the Snow Basin decision **recognized that the combination of unique site characteristics and Forest Service expertise would be sufficient for site-specific amendments to be upheld**. If there is a biological need there is legal justification for amending the Forest Plan accordingly.

¹ Ince, P.J.; Kramp, A.D.; Skog, K.E.; Spelter, H.N.; Wear, D.N. 2011. *U.S. forest products module: a technical document supporting the Forest Service 2010 RPA assessment*. Res. Pap. FPL-RP-662. Madison, WI: U.S. Department of Agriculture, Forest Service, Forest Products Laboratory. 61 p.

² Skog, Kenneth E.; McKeever, David B.; Ince, Peter J.; Howard, James L.; Spelter, Henry N.; Schuler, Albert T. 2012. *Status and Trends for the U.S. Forest Products Sector: A Technical Document Supporting the Forest Service 2010 RPA Assessment*. General Technical Report FPL-GTR-207. Madison, WI: U.S. Department of Agriculture, Forest Service, Forest Products Laboratory. 35 p.

The Mill Creek scoping summary provided for the public states:

The purpose and need for the Mill Creek project was derived from comparing the existing conditions in the project area to:

- **Goals, objectives and desired conditions identified in the Forest Plan, as amended;**
- **Historic conditions in dry forests in the project area (historic range of variability);**
- **Best available science regarding dry forest restoration; and**
- **Goals and objectives identified in the National Cohesive Wildland Fire Management Strategy**

The Mill Creek project is not utilizing best available science or adequately moving the dry forests in the landscape toward the historic range of variability with the current proposal to leave all trees greater than 21 inches dbh. AFRC is well aware that there are efforts underway to address some facets of the Eastside Screens however those changes may not be in effect when the Mill Creek project is ready for implementation. **Specifying the potential need to remove trees greater than 21” at dbh, trees greater than 150 years, or other relevant Eastside Screens limitations in the NEPA would be prudent and essential to meeting the Purpose and Need as described above. We urge the District to consider a project-specific plan amendment to facilitate these treatments and request an alternative be created that includes the removal of trees greater than 21 inches dbh.** A field trip to the Mill Creek planning area on July 25, 2018 with the Ochoco Forest Restoration Collaborative (OFRC), Forest Service personnel, and forest industry members featured field trip stops that displayed densely stocked stands that were in urgent need of density reduction to improve forest health, mitigate dwarf mistletoe infestations, and reduce the risk of uncharacteristic wildfire moving through the area. In order to achieve appropriate levels of reduction there is a need to remove trees of various species greater than 21 inches. The three photos below were taken in the Mill Creek planning area on the July 25 field trip.





Operations

AFRC advocates allowing as much flexibility as possible within the contract while still meeting the management goals and guidelines contained in the NEPA document. This flexibility allows the purchaser to use the most economically viable systems thus keeping the ability to pay higher stumpage rates. Logging contractors must average 10 months of work per year in order to be profitable. Developing the Mill Creek proposal with that in mind is critical. AFRC advocates allowing as much flexibility as possible within the contract while still meeting the management goals and guidelines contained in the NEPA document. This flexibility allows the purchaser to use the most economically viable systems, which increases the ability of the purchaser to pay higher stumpage rates. Placing restrictions on the specific machinery to be used severely

impacts the economic viability of the timber sale while not improving the end result. Locking in the specific types of logging systems and equipment in the NEPA document removes flexibility during the implementation stage. Analyzing areas for “tractor/cable” and working with industry on the ground during implementation will provide for best meeting restoration objectives that are economically viable. Allowing for “pre-bunching” to skyline corridors will help with the economic viability of these cable units. As we discussed during the field trip, some of the cable units are very marginal with regard to merchantable volume per acre to be removed and allowing pre-bunching will help significantly with defraying logging costs. The Mill Creek planning document does not include any commercial logging on slopes greater than 35 percent which is considered “cable ground” in the Forest Plan. Forest Service personnel indicate that the Ochoco Forest Resource Collaborative is considering implementation of a “pilot project” utilizing alternative methods and equipment in those areas in the Mill Creek project. AFRC urges the Forest Service to include the analysis of those steeper lands in this planning document, including a Forest Plan amendment as necessary, rather than initiating a new effort to complete the analysis in the future. Mill Creek is called a “landscape scale project” and should be analyzed as such.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are rigid operating restrictions and poorly designed contract pricing methods. We understand that the Forest Service must take necessary precautions to protect natural 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 NEPA documents and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift 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. This includes seasonal operating restrictions around wildlife (such as goshawks and elk calving areas).

Forest restoration to mitigate uncharacteristic wildfire events and promote resilience through management treatments such as those prescribed for the Mill Creek project is dependent on the retention of local logging and milling infrastructure. Due to the limited local milling infrastructure and the long haul distances from this area the contract pricing product removal structure is critical. The scoping notice identifies thousands of acres of non-commercial treatments. Using the timber value from commercial treatments as a vehicle to implement these non-commercial treatments will drastically compromise the economic viability of any sale generated off this project. We would like to remind the District that the National Office formally lowered the minimum rate for low value material on **all species** to \$0.25/CCF. We have attached that letter to our comments. AFRC believes that the term “low value” identified in this letter applies to any species of any quality whose value is drastically reduced due to any combination of high costs necessary to deliver that product to a manufacturing facility; this includes but is not limited to expensive yarding systems, requirements to remove non-commercial material, long haul distances, and excessive operating restrictions.

Provisions that would allow for removal of biomass and nonmerchantable material that is subject to agreement will be necessary on Mill Creek. Weight scale rather than tree measurement should be considered on merchantable material given the discrepancies between Forest Service cruising methods and industry merchantability standards. Flexibility on the product removal side

will be key to effectively to implementation and meeting objectives on the Mill Creek project. 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.

Riparian Habitat Conservation Area Management

AFRC fully supports treatments in RHCAs and encourages the Forest to be aggressive in the number of stream miles treated. RHCAs are the most productive areas on the landscape and change rapidly over time. The next entry may be too late given the extreme fire seasons that this area has been experiencing over the last decade. We would like the District to consider the document cited below specific to riparian management in dry forest landscapes. We believe this paper emphasizes the need to actively manage these riparian areas to meet the stated objectives described in the scoping notice for this project.

Messier, Michael S., Shatford, Jeff P.A., and Hibbs, David E. 2011. Fire Exclusion effects on riparian forest dynamics in southwestern Oregon. *Forest Ecology and Management*. 264 (2012) 60-71.

Key points of the Messier paper include:

- Fire exclusion has altered the structure, composition, and successional trajectory of riparian forests in fire-prone landscapes.
- Fire exclusion has been associated with increase in tree density and recruitment of shade-tolerant species that may replace large diameter, more decay-resistant Douglas-fir trees.
- A hands-off management regime for these riparian forests will have ecologically undesirable consequences.

Road Decommissioning

Mill Creek planning documents indicate that 3.26 miles of road will be decommissioned. However, 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 road decommissioning proposed in the Mill Creek scoping notice likely represents a **permanent** removal of these roads and likely the deferral of management of those forest stands that they provide access to. The land base covered in the Mill Creek project area are to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

Recommendations provided in the Travel Analysis Report will likely be a starting point for the District to consider road infrastructure needs. The RIS directs the agency to analyze roads for decommissioning based on assessing the tradeoffs between benefits and risks of retaining each road segment.

We would like the District to carefully consider the following 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.

Carbon Literature

We would like to encourage the Lookout Mountain District to consider several documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when compared to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. *Ecosphere* 7(1):e01224. 10.1002/ecs2.1224

Key points of the Gray paper include:

- Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the sequestration of carbon from atmospheric CO₂, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

Fire Risk

AFRC believes that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to quickly and directly attack nascent fires. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.

If the Forest Service proposes to decommission, abandon or obliterate road segments from the Mill Creek planning area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will enable firefighters quicker and safer access to suppress any fires that are ignited.

Thank you for the opportunity to provide scoping comments on the Mill Creek project. It would be very helpful if some basic tables were provided that summarize the activity acres in each Forest Plan administrative allocation. I look forward to following the implementation of this project as it moves forward. Please feel free to contact me if I can assist you with determining the economic feasibility of silviculture treatments and logging system requirements.

Sincerely,



Irene K. Jerome
AFRC Consultant

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