

December 21, 2020

William Conroy Siuslaw National Forest Hebo Ranger District 31525 Highway 22 Hebo, OR 97122

In Reply To: Sand Lake EA

Dear Mr. Conroy:

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 Hebo 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 Hebo Ranger District proposing vegetation management on Adaptive Management Area (AMA) and Riparian Reserve 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 Siuslaw for continuing to provide this supply year after year.

Purpose & Need

The AMA allocation provides the Forest Service with a unique set of objectives when compared to the Reserve allocations that consume much of the Siuslaw National Forest. Several of these objectives are related to socioeconomic issues, which is recognized in the Purpose & Need for the Sand Lake project. The northwest forest plan was also clear on the role that timber supply has within the AMAs. It states on D-8 that "AMAs are expected to produce timber." This expectation is stated clearly and concisely as timber production in alignment with other objectives for each AMA but also as an objective of its own. We requested in our scoping letter that this nuance be recognized by including timber production in the Sand Lake Purpose & Need statement. However, page 3 of the EA only recognizes timber as "byproduct" necessary to fund other activities. Although the ability for timber value to fund service work is noteworthy, we believe that the provision of timber from the AMA and from the Sand Lake project is an objective independent of its ancillary benefits. In other words, timber should be provided from the AMA and from the Sand Lake project whether or not it funds additional service work, and the Purpose & Need statement should reflect that. This may sound like an insignificant distinction; however, we feel that it is important for the Siuslaw National Forest to recognize its role in the larger timber landscape in western Oregon as directed by its Land and Resource Management Plan by accurately articulating that timber provision is an objective rather than a byproduct.

In addition to advocating for a robust timber supply from federally managed forest land, AFRC also advocates for a management paradigm that can provide that supply sustainably. The large expanses of land identified as Late Successional Reserve (LSR) on the Siuslaw NF have largely resulted in management activities, namely thinning mid-seral stands, that are ultimately unsustainable. At the current trajectory the Siuslaw will likely exhaust its mid seral thinning opportunities in the near future as previously treated stands develop into a condition where active management is no longer necessary to meet the desired conditions for the LSR. Therefore, the small amount of land allocated as Matrix and AMA provide the only opportunity for the Siuslaw to develop and implement treatments that *differ* from those on land allocated as LSR. It is critical that those different treatments expand beyond exclusively thinning mid seral forest stands by incorporating various forms of regeneration harvest including shelterwood, seed tree, group selection, and heavy thinning that can establish a young cohort of trees that can both diversify the age class and forest type as well as provide timber products for the future. We are very pleased to see the Hebo District propose some such treatments on the Sand Lake project. The incorporation of heavy thinning, gaps, and 5-acre openings are not only appropriate for the AMA guidance but critical to meeting the needs of early seral habitat dependent flora and fauna and to the needs of the local timber industry. We urge you to move forward with implementing the full suite of early seral treatments outlined on page 10 of the EA.

AFRC encourages the District to implement the Action Alternative in a way that meets the described project purpose and need to a high degree. 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 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. As you're aware, several units have already been dropped between project scoping and EA publication. These deferrals amount to 300 acres of treatment where the project objective of accelerating late seral habitat will *not* be achieved. We urge you to not diminish the project's scope any further.

As we mention above, the early seral habitat creation through regeneration harvest is particularly important to AFRC. Given the lack of regeneration harvest on the Siuslaw NF since the inception of the northwest forest plan, we think that maximizing these treatments on the Sand Lake project is warranted. The outline of these treatments on page 10 suggests that "up to 219 acres" have been identified for early seral treatment. However, this description goes on to note that "no more than 100 total acres" would be created. It's not clear why the Forest Service decided to cap these treatments at 100 acres.

We are also confused regarding some language on page 25 stating that "because no regeneration harvests are proposed, the age-distribution of forests in the proposed alternative would remain the same." Despite the Forest Service's nomenclature of "early seral" rather than "regeneration harvest" to describe certain treatments proposed in the action alternative, we believe that the age-distribution of those stands nevertheless is altered. Perhaps the Forest Service is purporting that those early seral units are not individual "stands" warranting their own identifying features, such as age, but rather a component of a larger stand whose age will remain the same? If so, clarification in this section of the EA may be useful.

<u>Wildlife</u>

AFRC supports project design features that attain the project purpose and need and are supported by sound science. Ongoing requests from some stakeholders to apply no-cut buffers in proposed thinning units in the interest of marbled murrelet are NOT supported by sound science, and we are happy to see the Forest Service clearly describe this reality on page 17 of the EA. In order to speak and write about this topic wellinformed, we have conducted our own literature review, including much of the literature that proponents of buffers have cited, and have identified NO supportive research on the concept of adverse "edge effects" along partial harvest treatments, including thinning. Some of that literature is outlined here for reference, although we assume the Forest Service is well aware of much of what we include.

Raphael, M.G.; Evans-Mack, D.; Marzluff, J.M.; Luginbuhl, J.M. 2002. Effects of forest fragmentation on populations of the marbled murrelet. Studies in Avian Biology

• This paper refers to edge often. It defines edge as "clearcuts, roads, and rivers." The authors limit their definition of a "clearcut" to stands aged 1-15 years old.

Nelson, Hamer. USDA Forest Service Gen. Tech. Rep. PSW-152. 1995. Nest Success and the Effects of Predation on Marbled Murrelets.

• Here the authors define edge once as "unnatural openings, including but not limited to, roads and clearcuts."

Van Rooyan, Malt, Lank. Northwest Science, Vol. 85, No. 4, 2011 Relating Microclimate to Epiphyte Availability: Edge Effects on Nesting Habitat Availability for the Marbled Murrelet

- This paper got into a bit more depth on edge. The authors state that "dense canopy of regenerating forest at soft edges buffers the negative impacts of altered microclimate at forest edges."
- They go on to define "regenerating forests" as forests between age of 11-30 years old and that such buffers may act as a "buffer."
- Finally, they state that adverse impacts from edge are reduced as clearcuts "regenerate" and define this timeline as 20-30 years old.

Collectively, we believe this literature is clear on how it defines "edge" habitat. It is also clear that boundaries created by partial harvest (thinning) do NOT constitute edge habitat that could potentially create a predation risk to murrelets.

AFRC understands and supports the Forest's requirements and efforts to manage impacts to sensitive wildlife species, namely the northern spotted owl and marbled murrelet. However, we believe that many of the project mitigation measures proposed in the Sand Lake project are overly conservative as they are all based on assumptions of species presence. For example, the unit deferrals outlined on page 60-61 and operating restrictions outlined on page 66 for the northern spotted owl are all based on presumed owl occupancy. Page 44 outlines the methodology used to generate two spotted owl "sites." This methodology was used to identify areas where owls are *likely* to occur. Subsequent unit deferrals and operating restrictions were implemented to protect owls that may or may not be associated with these generated sites. AFRC believes this to be an extremely conservative approach toward species protection—specifically the operating restrictions. The likelihood that owls may use these generated sites at some point in the future is higher than the likelihood that they will be using them at the time of implementation. We would like the Forest Service to consider the cost/benefit tradeoffs of imposing operating restrictions on areas where occupancy is merely presumed. The potential benefit is severely limited while the cost is significant in terms of implementation difficulty for operators and reduced value for the timber as a result of these difficulties. Tradeoffs from treatment deferral surround these generated sites should also be examined. The treatments proposed are designed to accelerate the development of late seral habitat to the benefit of spotted owls. Deferring treatment now to mitigate potential risk to a potential owl will have long-term habitat repercussions.

Page 60 of the EA considers impacts from thinning to snags and down wood. Obviously, thinning treatments remove live trees from the forest. Depending on harvest methods, some material from those live trees may remain on the forest floor, but the large wood is removed and utilized for wood products. Snags and down wood, on the other hand, are not removed from the forest. Snags posing a safety hazard during operations are allowed to be felled and left on site. However, the EA states that "thinning treatments would reduce the total amount of snags and down wood." We believe what the Forest Service is implying is that "thinning treatment *may* reduce the total amount of *future potential* snags and down wood." This potential reduction is based on the reasonable assumption that trees that would otherwise die from competition mortality are being harvested and removed. This is a fair assumption. However, we think the EA should be clear on the fact that any reduction of snags and down wood is a potential in the future. Aside from safety hazards, no reduction would occur (in fact, there is potential that down wood would increase due to the felling of safety hazards).

<u>Riparian Reserve</u>

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.

Collectively, we believe that this literature suggests that there exists a declining rate of returns for "protective" measures such as no-cut buffers beyond 30-40 feet. Resource values such as thermal regulation and coarse wood recruitment begin to diminish in scale as no-cut buffers become much larger. We believe that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood recruitment, based on this scientific literature. We urge the Forest Service to establish no-cut buffers along streams no larger than 40 feet and maximize forest health outcomes beyond this buffer.

Economics and Operations

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 Siuslaw National Forest has recognized these issues and has taken steps toward creating flexibility in EAs while still protecting resources of concern. We appreciate the extensive road mileage proposed for wet weather haul on the Sand Lake project. With the spring and summer operating restrictions associated with wildlife species, the ability to operate in the winter months is critical.

We also appreciate the Siuslaw's efforts to create flexibility regarding equipment usage and logging methods. There are a variety of operators that work in the Hebo 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. 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're aware that many purchasers in western Oregon have increased their use of tethered-assist equipment on regeneration and thinning harvests. The Hebo District has authorized use of such equipment in recent years on thinning sales and we urge you continue this practice. Doing so will increase the contractor pool able to operate on Forest Service sales and, subsequently, support the local economy and improve the economic viability of sales.

Road Management

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 Hebo District is working to accommodate this.

We see that the EA proposes 3.3 miles of road for decommissioning. AFRC is particularly concerned about an in-tact road system that facilitates the active management on appropriate lands, specifically those lands designated as AMA where economic considerations are paramount. Sustainable timber management is unlikely to occur in an economical manner without a quality road system in place. 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." The future management implications of closing a road versus decommissioning a road are significant. Decommissioned roads will likely never be reopened again, whereas stored roads may be used in the future. Three road segments proposed for decommissioning are particularly concerning to us as they appear to provide access to large and otherwise inaccessible areas: road 136, 137, and 149. The Forest Service is effectively deferring any type of active management on stands that those roads provide access to. Please consider road storage rather than decommissioning on these segments. Storage, if done properly, would mitigate resource risk, alleviate the Forest Service from ongoing maintenance costs, and provide future access.

Another factor contributing to timber sale economic viability is rock source for required and/or optional road work. Costs associated with hauling rock long distances has been escalating in recent years and often represents a significant cost in timber sale implementation for our members. In fact, this spike in cost has recently been identified by several purchasers as a primary contributor to sales going no-bid. We appreciate the Forest Service's efforts to identify two potential rock sources in the project area. Development of these quarries will improve the economic viability of any sales generated off the Sand Lake EA.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision-making process for the Sand Lake EA. Should you have any questions regarding the above comments, please contact me at

Sincerely,

Andy Geissler Federal Timber Program Director American Forest Resource Council