Via Email: https://www.fs.usda.gov/project/?project=57625

October 1, 2021

Bill Gamble, District Ranger
La Grande Ranger District
3502 Hwy 30
La Grande, OR 97850

Dear Bill:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments on the Sheep Creek Vegetation Management Project (Sheep Creek) preliminary environmental assessment (PEA). Sheep Creek is located on the La Grande Ranger District of the Wallowa Whitman National Forest. The planning area encompasses approximately 30,000 acres and proposes a variety of resource treatments on 12,785 acres including 3,367 acres of harvest treatments that will produce an estimated 8.9 MMBF of merchantable timber. This area is a very important and popular to the residents of the area and to 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 Wallowa Whitman 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—Timber Production and Timber Production/Winter Range

AFRC strongly encourages treating as many acres as possible and treatment of the majority of mature timber stands, either through thinning across all age and size classes or regeneration harvests within the Sheep 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 Sheep 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 a principal objective to any project proposed on National Forest System (NFS), land particularly those lands designated for sustainable timber production, 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. 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 is very pleased to see the significant increase in commercial volume proposed in the Sheep Creek project. This volume is not only very important for our members, it is critical for financing the extensive restoration activities in the project area. The PEA states on page 6 that 97 percent of the project area is suitable for timber production with the goal of regularly scheduled timber harvests. AFRC is interested in reviewing that timber harvest schedule from the implementation of Sheep Creek into the future.

Purpose & Need – Relationship Building

Item 6 on page 3 of the scoping letter states: "The Sheep Creek project offers an opportunity to address the need to build trusting relationships, learn and enhance understanding of the short, mid and long term social, economic and ecologic effects of alternative forest management approaches on complex landscapes." AFRC requested some background information on this need in the ensuing NEPA document which does not appear to be included. AFRC doesn't dispute this premise and supports collaborative efforts, however we question whether the environmental analysis is the appropriate vehicle for evaluating "relationships." How will the District determine if the purpose and need has been met with respect to "relationship building?" The monitoring plan for "relationship building" is not listed in Table 10 in the monitoring table.

Operations

Appropriate levels of flexibility within the contract while still meeting the management goals and guidelines contained in the NEPA document are paramount to ensuring an economically viable project. 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 Sheep Creek proposal with that in mind is critical. Placing restrictions on the specific equipment to be used negatively 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 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 measures to protect key resources; however, we believe that in many cases there are conditions that exist on the ground that are not aligned 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 Sheep 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 to fund 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 the Sheep Creek project. 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 Sheep 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.

AFRC fully supports a site specific plan amendment to permit tethered logging. On page 7 of the PEA there is mention that "tethered logging" will provide improved economics. It is critical for Forest Service personnel to recognize that tethered logging is not necessarily "less expensive" than skyline logging. Rather, it provides significantly more opportunities for yarding material off steep ground without road construction and without skyline logging equipment. Skyline logging contractors are few and far between in eastern Oregon and western Idaho. The few companies that do exist in northeast Oregon prefer to work on private lands as the profitability is significantly greater, while Forest Service sales pose a significant risk to their company's viability. It is critical that Forest Service personnel reach out to the forest contractors with tethered systems before preparing contracts and appraisals. AFRC would be more than happy to assist you in any way possible with this endeavor.

The harvest patch cuts (HPOs) are planned to be three to five acres in size. Does this acre range match the "patch" size that occurred historically on the landscape? It would seem that in the cool/cold moist forest vegetation types that the realistic acre range for patches would be three to thirty acres. Where is the best available science behind the top range acre limit of five acres?

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-tolerate 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.

Carbon Literature

We would like to encourage the La Grande 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 comparted 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 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.

The Sheep Creek PEA has numerous pages of "Project Design Criteria" starting on page 23. This level of detail does not belong in the environmental assessment. Please reference the material in another manner or include in the appendices. Reprinting the timber contract in the PEA is not appropriate.

Thank you for the opportunity to provide comments on the Sheep 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,

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