



Associated Oregon Loggers, Inc.

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February 1, 2022

Jennifer Watts
District Ranger
Clackamas River Ranger District
16400 Champion Way
Sandy, OR 97055-7248

In Response to: Clackamas Fires Roadside Danger Tree Assessment Scoping Letter

Dear Ms. Watts,

Introduction

Associated Oregon Loggers (AOL) is a local trade association which represents hundreds of family-owned forest contracting businesses. Our members have been involved in the management of federal lands for decades. Our members are essential to conduct any activity in the woods, be that road work for access, timber falling for management and restoration, reforestation for sustainability, trucking for product transportation, and many other services. AOL's members provide a diverse array of services that are necessary for the Mt. Hood National Forest to conduct all of its forest management activities in order to achieve the goals and objectives of its Forest Management Plan and Northwest Forest Management Plan.

Many of AOL's members were actively engaged in the Riverside, Lionshead and Bull Complex fires and are able and willing to help with the clean-up efforts to remove danger trees post-fire as well.

Proposal

AOL's members are all too familiar with the dangers in the woods on a good day and expose themselves to even more dangerous conditions when operating in burnt landscapes. When decaying trees fall near people, the ability for them to strike and injure someone is high. These trees can also roll great distances under the right conditions and can even fling branches or other wood material further than one may suspect. The longer a burnt tree stands on the stump, the longer it has to decay and be infested with insects that compromise the integrity of the fibers. AOL implores the Mt. Hood National Forest to allow for flexibility and deference to the operator in assessing risk of tree failure based on their expertise falling trees and being in the woods every day. Each circumstance is different and should be considered when determining striking distance. Some areas may only require one tree length to be used, while others may require more than 1.5 tree lengths. It is best to err on the side of caution when determining how likely a dead tree is to hurt a member of the public, a forest service employee or a contractor that may be traveling on Forest Service roads.

Danger tree is defined in OR-OSHA's Oregon Administrative Rule 437, Division 7 (Forest Activities) as "A standing tree, alive or dead, that presents a hazard to personnel due to deterioration or physical damage to the root system, trunk (stem), or limbs, and the degree and direction of lean." In 437-007-0225 (2) **Working Near Unstable Objects & Danger Trees** - it states, "Before work starts, a competent person

must evaluate any danger tree(s) or snag(s) within reach of a work area to determine if it poses a hazard to personnel. If the tree(s) or snag(s) poses a hazard, it must be felled or the work arranged to minimize danger to workers.” Forest operators must abide by this Oregon regulation and it is the responsibility of the Forest Service (FS) to know and understand the overarching authority of OR-OSHA. A competent person must always be on site to identify risks and AOL would hope that the FS adheres to this responsibility and works with this individual to identify workforce hazards and allow danger trees to be removed as per the judgement of the on-site competent person doing the work.

AOL believes the risk to operators in removing long standing hazard trees is not often considered by the FS. When a forest determines the timeline for post-fire restoration, logger safety is not a driving concern. The longer the FS delays management, the more likely there will be accidents to the public trying to use FS roads and to operators trying to remove these extremely hazardous trees. To that end, AOL would prefer the Forest implement quick restoration and wholistic restoration where roadside hazards are quickly removed and salvage operation actually occur.

The Northwest Forest Plan – Standards & Guidelines clearly states on page C-16 that in Late-Successional Reserves, “Road maintenance may include felling hazard trees along rights-of-way.” On page B-9, the same document states, “In the matrix, objectives for management after stand-replacing events will generally differ from those for Late-Successional Reserves. Economic benefits of timber production will receive greater consideration. For example, the commercial salvage of dead trees will be less constrained, and replanting disturbed areas will be a high priority.” What this means is that no matter the Land Use Allocation, hazards should be removed after wildfires.

When the FS delays management and does not seek to restore its forests with healthy trees post-fire, it shows the lack of understanding the agency has in operator safety, public safety and future firefighter safety. It is well known these hazards need to be removed, and all of this posturing and contemplation simply delays the work and exposes forest operators to more risk. It is important to know however that AOL members are prepared to be partners in dealing with these danger trees in any case, we just ask that future fire damaged trees be removed quickly as to limit risk exposer to operators.

The fact is, roads are critical for management activities, administrative use, firefighter access and recreation of all kinds. AOL urges the Clackamas River Ranger District (CRRD) to analyze the removal of hazards along and maintain the over 250 miles of currently closed roads in the planning area. The Forest cannot let these hazards go unaddressed and must reopen these public lands to the public.

By fully addressing this issue and prudently removing trees that have any likelihood to fall, strike and injure or kill a member of the public, a Forest Service employee or contractors, the Mt. Hood Nation Forest will be doing the right thing. This strategy also offers the highest likelihood for completion of the work due to operational feasibility and financial soundness. For commercially viable sales, a tree removed here or there will not pay its way out of the woods and will not get completed if companies do not bid on it. Similarly, a service contract will be very costly if it has sparse work and many moves. The forest will need to make it worth it to contractors to get bids.

Conclusion

AOL would like to see a quicker response to wildfire from the Mt. Hood that prioritizes safety of the public, forest employees and contractors. When the Forest is able to restore the forest on a reasonable time frame, hazards can more safely be removed, they can be used to make merchantable products and they can help offset the costs of other repair costs. Due to the longevity of the delay of work in these burn scars, AOL requests the Forest maintain their intent on utilizing site-specific circumstances to identify striking distance and we ask that operators be consulted in these on-the-ground decisions due to their expertise working in the woods and around hazardous burnt trees. The FS needs to work with the competent person on site to accurately identify hazards in accordance with OR-OSHA Div. 7.

Thank you for the opportunity to provide written comment on the Mt. Hood National Forest's Clackamas Fires Roadside Danger Tree Assessment Scoping Letter for our members who depend on a sustainable and predictable supply of timber across Oregon and are the local experts on the ground in identifying hazards and abating them.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amanda Astor', with a long horizontal line extending to the right.

Amanda Astor
Associated Oregon Loggers
Forest Policy Manager
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