



August 23, 2022

Mark Sommer
Deputy District Ranger
Umpqua National Forest
2020 Toketee Ranger Station Road
Idleyld Park, OR 97447

In Reply To: Archie Creek Roadside Danger Tree Mitigation Project

Dear Mr. Sommer:

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 Willamette 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. 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.

Douglas Timber Operators (DTO) is a community-supported forest products organization whose mission is to actively promote timber harvest, reforestation and production of forest products on public and private timberlands. Our membership includes over 140 forest product manufacturers, loggers, truckers, forest landowners, Indian Tribes, local businesses and individuals. Our members are directly impacted by the economic recovery of federal lands within the Archie Creek Fire, as well as the risk to private lands from future wildfire and insect infestations as a result of failure to remove tens of thousands of acres of dead wood on federal lands.

We are generally pleased to see the Forest Service take action to ensure that their road network is cleared of hazardous danger trees. 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.

However, we are disappointed in the Forest Service's inability to initiate such actions in a timely manner to guarantee utilization of these hazard trees for wood products. Our hope is that some of this material has not yet deteriorated beyond the point of utilization. Unfortunately, since operations won't begin until three years post-fire, these hopes are likely in vain.

Tree Identification and Felling

We are pleased to see that every tree within striking distance of the roadway will be removed as part of this project. This will not only provide the greatest desired outcome for this project but will also ensure the highest safety for contractors and the public.

We are pleased to see that "The evaluation of trees would be conducted by qualified Forest Service personnel and contractors". We recommend that, **wherever possible, selection of removal tree be determined by the operating contractor**, rather than marked for removal prior to start of felling operations. Depending on the time between marking and felling, mortality may not manifest itself in individual trees until after marking has completed. The marking guidelines as written will be clear enough for any experienced contractor to implement effectively and without damage to additional resources.

Commercial Harvest in Riparian Reserves

The scoping notice indicates the possibility for some hazard trees to be "cut and left on site where down wood is needed." Given the scale, proportion, and magnitude of the overall fire footprint, the relatively minor amount of fire-killed trees that will be felled, along with the unlikely salvage of any additional burnt timber beyond this project, **we strongly recommend that the Forest sell as many felled hazard trees to the local industry for utilization as wood products as possible.** Much of your LRMP direction requires the Forest to maintain down woody debris "across the landscape." The Northwest Forest Plan directs the Forest Service to provide coarse woody debris "*well distributed across the landscape (Standards and Guidelines C-40).*" **Please consider the level of coarse woody debris "across the landscape", specifically across the 26,645 Forest Service acres burnt, when assessing the need to retain additional down woody debris adjacent to roads.** By your own analysis, "the fire will provide ample stream inputs of large wood, and large woody material will likely exceed the upper end of the range of natural variability for several decades to come." At this scale, there should be no need identified to retain any trees felled as a result of this project.

If the Forest Service does complete the EA in a prompt manner and is able to capture some timber value from the fire-damaged trees we urge you to acknowledge that **standard utilization specifications used on green Forest Service timber sales will not likely be appropriate for any salvage sales generated from this EA.** Due to the damaged nature of the timber products being proposed for harvest, there will be an unusually high level of uncertainty by the Forest Service and prospective purchasers of the actual value of those products on the stump prior to harvest. This uncertainty is

exacerbated by the fact that additional time for wood deterioration will elapse between the time of purchase and the time of harvest. Therefore, the Forest Service should be developing minimum removal requirements and utilization specifications that align with this uncertainty. Purchasers will recover as much value from these damaged products as possible. Requiring them to recover value that is not available will reduce the likelihood that these sales will successfully sell.

AFRC and DTO are happy to be involved in the planning, Environmental Assessment, and decision-making process for the 2020 Archie Creek Fire Danger Tree Mitigation Project. Should you have any questions regarding the above comments, please contact Corey Bingaman at 541-521-9143 or cbingaman@amforest.org; or Matt Hill at matt@dougtimber.org.

Sincerely,



Corey Bingaman
Western Oregon Coordinator
American Forest Resource Council



Matt Hill
Executive Director
Douglas Timber Operators