December 19, 2022

Molly Juillerat
Middle Fork District Ranger
Willamette National Forest
46375 Highway 58
Westfir, OR 97492

In Reply To: Cedar-Gales Roadside Risk Reduction Scoping

Dear Ms. Juillerat:

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.

We are pleased to see the Forest initiate the scoping process for the Cedar Creek Fire in the same calendar year as the fire occurred. We understand that this is no small feat for the Forest and is likely the result of your proactive efforts during the fire to prepare for environmental analysis. This approach is encouraging to us. Not only will your efforts almost certainly provide usable forest products that can be utilized by AFRC members and converted into long-lasting wood products that capture atmospheric carbon, but the area treated will rehabilitate more quickly and ensure safe access for the visiting public. Compared to the Forest's (ongoing) efforts to treat areas affected by the 2020 Labor Day fires, it is worth applauding your efforts today.

That said, we are generally disappointed that this plan will treat such a small footprint of the 2021 and 2022 fires. Assuming a 100-ft buffer is treated across the entire 90 miles of proposed road in this letter (which is optimistic), this plan will only treat about 1% of the burned area from these two fires. This means that the vast majority of burned timberlands from 2021 and 2022 will succumb to the same fate as the areas affected in 2020: watersheds will choke, standing timber will deteriorate and become unusable, centuries-old forests will become brush fields, and large swaths of the Forest will become net carbon emitters. **We recommend that the project area for this EA includes all roadways affected by the 2021 and 2022 fires, as well as any Matrix LUA within these fire footprints.**

PURPOSE AND NEED

We are also disappointed to see that the first environmental analysis to come out of these fires does not list commercial timber production as a *need* for this proposal. We believe commercial harvest will not only produce the greatest intended result in terms of fuel reduction, but this will also generate usable forest products for our members who rely on the Forest to manage these lands for timber production. This is especially true of the large sections of Matrix LUA that were involved in both fire footprints. Treatments here should focus both on danger tree removal and commercial harvest. **We recommend that commercial timber harvest be included as a need of this EA.**

DANGER-TREE IDENTIFICATION

We are concerned that the Forest may not be properly assessing which trees have the potential to strike the roadway. Current guidelines for identifying and addressing hazard trees on U.S. Forest Service land are included in the Field Guide for Danger-Tree Identification and Response along Forest Roads and Work Sites in Oregon and Washington, 2016. That Field Guide includes various specifics on how to identify hazard trees in the context of their proximity to roads, campgrounds, and other potential target areas. Pages 38-42 include specifics on identifying Potential-Failure Zones. Copied below is the guidance for trees on level and sloped ground.

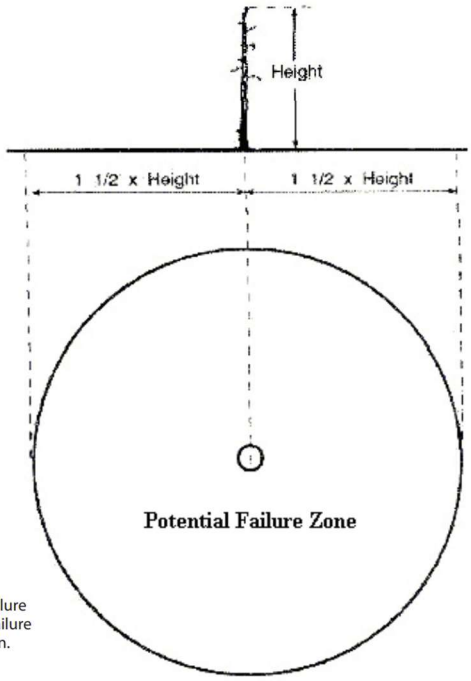

Fig. 7 – Potential-failure zone for total tree failure with no slope or lean.

Level or sloped ground with no lean

On level ground, the potential-failure zone is a circle around the tree with a radius equal to 1 ½ times the total tree height (Fig. 7). On sloped ground, the failure zone downhill from the tree should be extended whatever distance is necessary to protect people from sliding or rolling trees (Fig. 8).

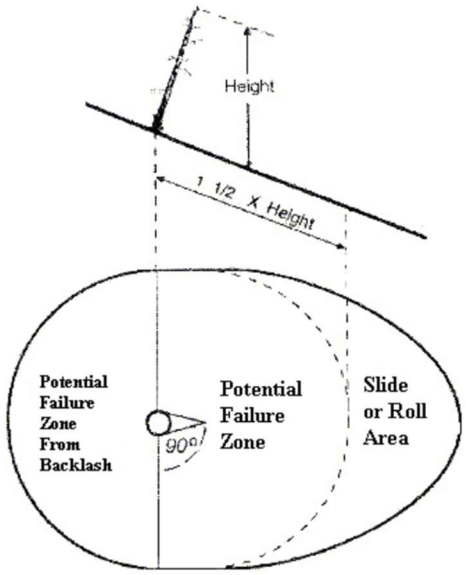

Fig. 8 – Potential-failure zone for total tree failure with slope and lean.

This guidance clearly indicates a potential failure zone of at least 1 ½ times the damaged tree. For trees experiencing 100% mortality, this would be 1 ½ times the height of the tree. Additionally, this guideline shows the area opposite the tree's lean should also be considered as potentially within the failure zone.

Yet the Willamette National Forest has opted to ignore this guidance and instead adopt a design feature where "a 100-foot-tall tree within 90-feet of the road would be fallen. However, should that same tree be 110-feet away from the road it would be left standing" and "Trees with greater than 25% lean away from the road are not to be cut." Under these two scenarios, it will be likely that hazard trees within the failure zone of an open road will be left standing. **Please explain why the Forest Service has decided to design this project in contradiction with your current guidelines when public safety and access are at risk?**

We are pleased to see the Forest include modifications to the R6 Danger Tree Guide to better reflect real-world conditions – particularly concerning the removal of dead Douglas-fir. We are similarly pleased to see flexibility in allowing the removal of some living trees showing signs of imminent mortality. Salvage sales often focus too heavily on restricting hazard tree selection to dead trees only without accounting for latent mortality in the remaining green trees. The result of this is a hazard reduction that is effective for the first few years following harvest, but eventually ineffective as mortality manifests itself. By including this flexibility, the Forest is ensuring that these roadways remain safe for years to come.

DETERMINATION OF TREATMENT

We are concerned that the Forest is relying too heavily on RAVG data to determine treatment need within the footprints of these two fires. Specifically, the RAVG data only captures a snapshot of mortality at a single point in time. There is no adjustment that captures latent mortality which, particularly in the most recent Cedar Creek fire, will continue to increase over time. Likely, this project will not begin operation until late 2023 at the earliest. This may lead to segments of road being deferred for treatment that will require treatment once operations begin. Understandably, the Forest is utilizing remote sensing indices to help expedite the process of identifying the need for treatment across these two fire footprints. We applaud the Forest for taking advantage of time-saving tools to prioritize treatment; but there should be follow up on the ground so the Forest can effectively treat the burned area. Additionally, latent mortality should be considered burn severity data to determine project boundaries.

We also disagree that the Forest should limit treatment to road segments in areas that experience 25% mortality or higher. To justify deferring treatment in areas with less than 25% mortality, the Forest maintains: "In these areas, the conditions are expected to be similar to those of Forest roads unaffected by fire which naturally and regularly experience low levels of tree mortality." (pg. 6). Is 25% mortality considered typical across the Forest? If so, isn't it safe to assume that the Forest was experiencing the same rate of mortality prior to the fire, and any disturbance would result in an increase in mortality to that same area? Our concern is, again, that the Forest is deferring treatment in areas where mortality is unnaturally high. We maintain that any area that experienced fire-induced mortality should be treated in order to preserve the roadway and to ensure that wood can be sold and utilized as usable timber, rather than being

removed as a cost to the Forest. **We recommend that any road segment that experiences fire should be proposed for treatment in this EA.**

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 uncertainly 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 uncertainly. Purchasers will recover as much value from these damaged products as possible. Required them to recover value that is not available will reduce the likelihood that these sales will successfully sell.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision-making process for Cedar-Gales Roadside Risk Reduction. Should you have any questions regarding the above comments, please contact me at 541-521-9143 or cbingaman@amforest.org.

Sincerely,

Corey Bingaman

Western Oregon Coordinator