



November 14, 2022

Chris Mushrush
Fire Planner
Willamette National Forest
4431 Hwy 20
Sweet Home, OR 97386

In Reply To: 2022 Roadside Hazardous Fuels Reduction Project

Dear Mr. Mushrush:

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 utilize the newly available "Fuel Break" Categorical Exclusion as a tool to expedite fuel reduction work along public roadways. Forest roads are the frontlines of wildland fire suppression activities. Too often, Forest Service roads provide untenable control points due to an abundance of accumulated fuels, making suppression difficult or impossible. For this reason, wildfire managers often prefer to indirectly attack wildfires from roadways that are adjacent to private timberland owners where control is easier (or at least more predictable). This puts an undue burden on private landowners who must risk their own timberland and livelihood for the greater suppression effort.

Additionally, we are pleased to see the Forest Service work in cooperation with adjacent private landowners to plan and implement this type of work. Adjacent timberland owners not only have a shared interest in protecting the remaining Federal timberlands from catastrophic wildfires, but they are also a good resource during project implementation. Furthermore, fuel reductions projects that extend across property boundaries are crucial to ensure that a fuel break is effective.

We are disappointed, however, that the Forest is planning to impose an upper diameter limit of 7 inches for vegetation removal, thereby excluding any form commercial timber harvest from this project. This is especially confusing given the flexibility of this particular CE to allow commercial harvest. Unfortunately, this follows a pattern that we see across the entire Federal timber program where projects that yield no commercial value are taking the agency's focus away from producing usable forest products. This comes at a time when the agency has more funding at its disposal than any time in recent memory.

To say nothing of the impact this restriction has on our members who rely on the Forest to manage their lands in a way that yields usable forest products; we believe that because the Forest will not consider removing trees larger than 7 inches from the project area, **your proposed action will not meet the purpose and need** of this project. Specifically, we do not see how the Forest plans to "reduce the risk of uncharacteristic wildfire" while retaining the same uncharacteristic fuel conditions that have lead to the Forest's greatest losses in recent years.

It's true that this project will reduce wildfire intensity at the ground-level, but this project will not treat the fuel conditions in the crown, where large fires have the greatest opportunity to spread. Adjacent Landowners have recognized this fact, and their fuel breaks are reflective of that: opting for wider spacing and lower fuel connectivity across these fuel breaks. While we are not advocating for the Forest to go beyond what they can do legally, we urge the Forest to recognize the need for meaningful action along these roadways. This collaborative fuel break can only be as effective as its weakest section.

AFRC is happy to be involved in the planning for the 2022 Roadside Hazardous Fuels Reduction Project. Should you have any questions regarding the above comments, please contact me at [REDACTED]

Sincerely,



Corey Bingaman
Western Oregon Coordinator
American Forest Resource Council