



March 4, 2024

Michelle King
Detroit Ranger District
Willamette National Forest
44125 North Santiam Highway SE
Detroit, OR 97342

In Reply To: Humbug GNA Thin Scoping

Dear Ms. King,

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.

AFRC is pleased to see the Detroit Ranger District include a proposal to thin stands to *improve stand growth and vigor, reduce fuels, and to produce wood products for the economy* in the opening paragraph for this project's scoping document. We are similarly pleased to see the District identify a *need* of this project to *thin these stands to achieve... anticipated future forest products*. While we agree that every forest service decision in the Matrix LUA should prioritize future sustained yield timber harvest, the *need* statement for the Humbug project should also echo the expectation that the project itself will also produce commercial material in the short term. Perhaps we are picking nits, but the purpose and need statement should be as straightforward as possible to highlight the importance that this landscape and the Matrix LUA have in contributing sustainable wood products to the region. 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 Matrix LUA is the only land allocation designated for commercial timber production. **We**

urge the Detroit RD to specify a *need* for the Humbug GNA Thin to provide commercial timber products.

Categorical Exclusion and EADM

AFRC is pleased to see the District employ the 70 acre thinning CE 36 CFR 220.6(e)(12) for the Humbug GNA Thin project. We believe that this decision fits well with expectations described in the Forest Service's Environmental Analysis & Decision Making (EADM) document. Among other expectations of decision makers, this document advises Responsible Officials to "use available authorities to streamline work" and to "select the most efficient NEPA process to match the actions proposed". The Humbug GNA Thin project will address both priorities in this document. This Forest has been employing the use of this CE for some time now, even prior to the release of this guideline. It is worth applauding the continued effort from this District.

Good Neighbor Authority

We are also pleased to see the District leverage the State's experience and resources via the Good Neighbor Authority (GNA) to provide planning capacity to the District's timber sale program. To-date, GNA projects for the Willamette have largely consisted of the Forest handing administrative duties off on to the State for individual timber sales. Our members universally agree that this has been a positive development for local federal timber sale programs. That said, it has been difficult to assess how much of the program has proven to be *additive* to the sale program, which is an explicit goal of the GNA partnership. We have maintained that for the GNA program to be truly *additive* to the federal timber sale program, then the ODF should be more involved in the planning phase of project development. The Humbug GNA Thin project and the nearby Kinney project are a welcome development towards that effort. We hope the Forest's partnership with the ODF will continue to grow from this experience.

Riparian Reserves

We are pleased to see the District propose thinning Riparian Reserves within the Humbug project area. In addition to creating project boundaries that are more logical, economical, and feasible; the forest health benefits that you expect to attain through upland thinning treatments can also be achieved in riparian areas with similar active management prescriptions. It has been well documented that thinning in dense, uniform forest stands accelerates the stand's trajectory to produce large conifer trees, vertical diversity, and tree-species diversity (Garman, Steven L.; Cissel, John H.; Mayo, James H. 2003.).

In recent decisions from the Willamette (i.e. the 2020 Fire Affected Road System Risk Reduction Project EA, 2022), commercial thinning in Riparian Reserves has been deferred in favor of "fall and leave" treatments. Such a decision leaves some of the most vital resources within the Forest more vulnerable to the negative effects of eventual wildfires. In projects which identify a *need* to improve stand resilience and resistance to stand-replacing events, retaining fuel loads within riparian areas is antithetical to that purpose.

The Scoping letter for the Humbug Project identifies "densely stocked stands [containing] contiguous canopy fuels that can sustain fire in the canopy resulting in stand-replacing mortality' as a reason for the *need* to "thin these stands to achieve desired condition". While the letter focusses

on reducing canopy continuity to improve fire resilience, we would argue that there is a similar need to reduce fuels at the ground level. This is particularly true within riparian areas where, in the event of a high-severity wildfire, the risk of damage to vital resources is too great. **We urge the Forest to allow removal of commercial material in Riparian Reserves.**

CARBON SEQUESTRATION

If the Forest Service identifies carbon sequestration and impacts to climate change as a key issue on this project, we would like you to consider some of the literature cited and outlined below:

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.

For those stands proposed for treatment, please consider that in the absence of commercial thinning, the forest where this proposed action would take place would thin naturally from mortality-inducing natural disturbances and other processes resulting in dead trees that would decay over time, emitting carbon to the atmosphere. Conversely, the wood and fiber removed from the forest in this proposed action would be transferred to the wood products sector for a variety of uses, each of which has different effects on carbon (Skog et al. 2014). Carbon can be stored in wood products for a variable length of time, depending on the commodity produced. It can also be burned to produce heat or electrical energy or converted to liquid transportation fuels and chemicals that would otherwise come from fossil fuels. In addition, a substitution effect occurs when wood products are used in place of other products that emit more GHGs in manufacturing, such as concrete and steel (Gustavsson et al. 2006, Lippke et al. 2011, and McKinley et al. 2011). In fact, removing carbon from forests for human use can result in a lower net contribution of GHGs to the atmosphere than if the forest were not managed (McKinley et al. 2011, Bergman et al. 2014, and Skog et al. 2014). The IPCC recognizes wood and fiber as a renewable resource that can provide lasting climate-related mitigation benefits that can increase over time with active management (IPCC 2000). Furthermore, by reducing stand density, the proposed action may also reduce the risk of more severe disturbances, such as insect and disease outbreak and severe wildfires, which may result in lower forest carbon stocks and greater GHG emissions.

Gustavsson, L., Madlener, R., Hoen, H.-F., Jungmeier, G., Karjalainen, T., Klöhn, S., ... Spelter, H. (2006). The Role of Wood Material for Greenhouse Gas Mitigation. *Mitigation and Adaptation Strategies for Global Change*, 11(5–6), 1097–1127.

Lippke, B., Oneil, E., Harrison, R., Skog, K., Gustavsson, L., Sathre, R. 2011 Life cycle impacts of forest management and wood utilization on carbon mitigation: knowns and unknowns, Carbon Management, 2:3, 303-333.

McKinley, D.C., Ryan, M.G., Birdsey, R.A., Giardina, C.P., Harmon, M.E., Heath, L.S., Houghton, R.A., Jackson, R.B., Morrison, J.F., Murray, B.C., Pataki, D.E., Skog, K.E. 2011. A synthesis of current knowledge on forests and carbon storage in the United States. Ecological Applications. 21(6): 1902-1924.

Skog, K.E., McKinley, D.C., Birdsey, R.A., Hines, S.J., Woodall, C.W., Reinhardt, E.D., Vose, J.M. 2014. Chapter 7: Managing Carbon. In: Climate Change and United States Forests, Advances in Global Change Research 57 2014; pp. 151-182.

Economic and Operations

Consistent and steady operation time throughout the year is important for our members not only to supply a steady source of timber for their mills, but also to keep their employees working. These two values are intangible and hard to quantify as dollar figures in a graph or table, but they are important factors to consider. The ability to yard and haul timber in the winter months will often make the difference between a sale selling and not. We understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season).

The McKenzie River Ranger District recognized this fact, and recently included such language in the Draft Decision for the HV Thin CE. In that document PDF#2 permits wet season haul "when certain condition in the PCW are met". That same district applied similar language with regards to ground-based equipment in the Draft Decision for their PC Thin CE under PDF#4 which prohibits: "ground-based equipment activities (such as mechanize falling, ground-based yarding, ground-based fuels treatment, temporary road construction, etc.) outside the dry season (generally May 15 to October 15), unless unusually dry conditions allow without soil compaction."

In the ensuing Decision for the Humbug GNA Thin CE, we urge the Detroit District to follow the lead of the McKenzie River Ranger District, and limit wet season haul and ground-based operations to the dry season **unless unusually dry conditions exist, or the road has been designed with an appropriate surface so as to minimize sedimentation.**

AFRC is happy to be involved in the planning and decision-making process for Humbug GNA Thin Project. 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 Field Coordinator
American Forest Resource Council