



Via: <https://www.fs.usda.gov/project/?project=63523>

June 24, 2023

Stephanie Kerley, District Ranger
1550 Dewey Ave, Suite A
Baker City, OR, 97814

Dear Stephanie:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Huckleberry Defensible Fuel Profile (DPFZ) project. The Huckleberry DPFZ project is located on the Whitman Ranger District on the Wallowa Whitman National Forest and is approximately 2965 acres in size. This area is highlighted in the Baker County Community Wildfire Protection Plan (CWPP) as wildland urban interface in need of treatment to provide safe evacuation routes in various areas.

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 Umatilla 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 forest sector employs approximately 61,000, 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.

Purpose & Need—Timber Base

AFRC is pleased to see the Whitman District proposing integrated vegetation management on their lands that will likely provide useful timber products to our membership. We are also pleased to see the District utilize the Wildfire Resilience Categorical Exclusion (CE)

in the Healthy Forest Restoration Act (HFRA) to streamline the project's timeline. Treatments designed to reduce the level of hazardous fuels should be viewed with a sense of urgency given the annual risk of high-intensity wildfire. Using CEs to expedite implementation is a critical component of effectively addressing the ongoing wildfire crisis. While the purpose and need for this project is primarily to reduce fuel loads to "minimize risk to firefighter and public safety, adjacent private and county lands, natural resources, and developed lands in the event of a wildfire" it is important to remember that 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. This supply is important for present day needs but also important for needs in the future. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments affect the long-term sustainability of the timber resources on NFS managed lands. AFRC has voiced our concerns many times regarding the long-term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. It is important to recognize that lands designated as Timber Production are the only lands where our members can depend on a sustainable supply of timber products, as timber outputs on lands designated as other management emphasis areas are merely a "byproduct".

We would like the District to consider expanding on the three components of the purpose & need by adding *the provision of forest products to the local community*. The District cannot justify selling the timber that is removed without some acknowledgement of the value of doing so in the purpose & need. Commercial removal of logs and potentially other material also provides an economically viable option to complete some of the restoration work and support the local economy. Please note that there is also an urgent need for the Forest Service to provide a consistent and stable supply of raw materials for the industry to stay in business. The Huckleberry DFPZ project proposes commercial thinning on approximately 2276 acres utilizing a combination of ground based and cable assisted logging systems.

Thee timber products provided by the Forest Service are crucial to the health of our membership. At this time, many of our members are an estimated 95 percent dependent on federal logs. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions and very specific requirements identified in the NEPA documents that later prove to be inappropriate or too inflexible to be adequately implemented on the ground. As stated above, 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). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Mt. Emily market area with a diversity of skills and equipment. Developing a NEPA document and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the CE and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. If some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Tethered-assist equipment is also becoming a more viable and available option for felling and yarding on steep slopes, however it is **critical** that industry with traction assist equipment be contacted in advance to determine the feasibility of the planned harvest.

At this time in eastern Oregon there are no markets within economical hauling distance that take non-merchantable materials and local mills are struggling with how to dispose of residuals generated in their facilities. If necessary, this issue should be identified in the NEPA document and please ensure that all nonmerchantable material removal is **subject to agreement** in whatever contracting mechanism you select.

Carbon/Climate

We encourage the Whitman District to consider the points below from a technical report by the Climate Change Vulnerability Assessment and Adaptation Project (SWOAP) in Southwest Oregon.

- Wood harvested from the forest, especially timber used for durable structures, can be reservoirs of long-term carbon storage (Bergman et al. 2014).
- Forests and their products embody a closed-loop system in which emissions associated with harvests and product use are eventually recovered as forests regrow.
- Although products may be retired in solid waste disposal sites, they decompose quite slowly, causing carbon to continue to be stored for many decades.
- Products derived from the harvest of timber from national forests reduce carbon emissions by substituting for more energy-intensive materials including concrete, steel, and plastics.

Please see the graph below from the IPCC (2007) that captures the ability of forests to “stack” carbon sequestration and storage through continual harvests. **Please consider adopting this graph into the Mt. Emily project analysis.**

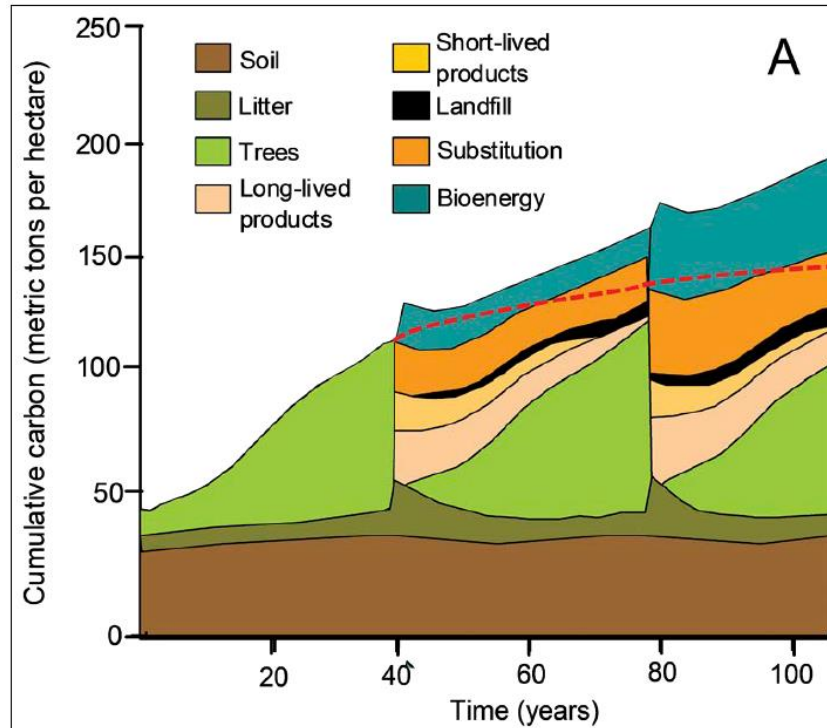


Figure 8.7—Carbon balance from a hypothetical forest management project in which the forest is harvested roughly every 40 years from land that started with low forest carbon stocks. This figure accounts for forest regrowth and carbon stored in wood products in use and landfills as well as the prevented release of fossil fuel carbon (also counted as stored carbon) via product substitution and biomass energy. It illustrates how forests can continue to accrue carbon over time with forest management. Figure is from McKinley et al. (2011) and adapted from IPCC (2007).

We believe that this graph encapsulates the forest management paradigm that would be most effective at maximizing carbon sequestration on a per-acre basis by “stacking” storage in wood products and regrowth of newly planted trees.

We would like to encourage the Whitman District to consider several documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when compared to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.

- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

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.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the sequestration of carbon from atmospheric CO₂, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

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.

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. These are the natural processes that are currently taking place on the Emily Ridgeline Project. 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 (Gustavasson 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.

AFRC looks forward to the implementation of the Huckleberry DFPZ Project which is important for many reasons including for the economy of Baker County. As a side note, my husband and I own 200 acres that is within the Huckleberry DFPZ Project. Please reach out to me if I can be of any assistance to you, either personally or professionally during the development of this project.

Sincerely,

A handwritten signature in cursive script that reads "Irene K. Jerome".

Irene K. Jerome
AFRC Consultant
408 SE Hillcrest Rd
John Day, OR 97845