



August 22, 2024

Michele Holman, District Ranger
Siuslaw National Forest
Central Coast Ranger District
1130 Forestry Land, P.O. Box 400
Waldport, OR 97394-0400

In Reply To: North Fork Smith scoping/Draft EA

Dear Ms. Holman:

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 Central Coast Ranger District, 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 submitted substantive written comments on November 10, 2022, in response to the posting of "pre-scoping" documents on the Forest Service website. We did not resubmit those comments following the "public engagement" letter from the Forest Service in June 2023. We appreciate that the District considered much of the pre-scoping input we provided and incorporated much of it into the Draft EA. We do not see the need to reiterate those portions of

our written comments during this comment period, however, we may reiterate other components that we feel were not fully considered or addressed in the Draft EA.

AFRC is pleased to see the Central Coast Ranger District proposing vegetation management on LSR, Riparian Reserve, and Matrix lands that will likely provide useful timber products to our membership. 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, and we thank the Siuslaw for continuing to provide this supply year after year.

AFRC has made several field visits to the project area during the project's planning process. We initially focused our visits to those small portions of Matrix land outside of Riparian Reserves, specifically in the southeast corner of the project area and along the 4811 road. While extremely limited, we felt that there were opportunities to implement regeneration harvest or group selection to create early seral habitat in the Matrix allocation. While such treatments were not ultimately incorporated into the action alternatives in the Draft EA, we would like to emphasize our desire to see such treatments considered on future projects as the need for early seral habitat on the Siuslaw remains important.

We also made field visits to some of the many deferred stands and communicated our concerns with the degree of stand deferral (64% of the available stands) to the Forest Service. We appreciate how the Forest Service highlighted the level of stand deferrals in the Draft EA and noted the contributions that those deferrals will make toward resource issues such as connectivity and NSO prey refugia. Ultimately, we would have liked to see an alternative that included treatment of a portion of those 7,194 acres of deferrals, but also understand, based on conversations we had with District resource specialists, why such an alternative was not developed.

Our pre-scoping comments also focused on how forest "edge" is defined and assessed in the context of marbled murrelet nest predation. We noted the focus that edge effects have received on past EAs off the Central Coast District and opined that the concepts of "hard" and "soft" edge was being conflated in public comments when referencing scientific literature. To address this, we provided a summary of our literature review on the topic of edge effects to murrelets. We were pleased to see how the Forest Service articulated edge effects in the Draft EA in relation to their effects on murrelets. We were also pleased to see that most of the peer reviewed documents that AFRC referenced in our pre-scoping comments were incorporated into the effects-analysis of the Draft EA.

Our pre-scoping comments also stressed the importance of active management in Riparian Reserves. Given the density and extent of stream channels in the project area coupled with the standard of using two site potential tree heights to establish stream buffers, nearly the entire

project area is covered by Riparian Reserves. In fact, supporting documents on the project webpage indicated that 83.3% of the project area is designated as Riparian Reserve. Given this footprint and the steep topography of the project area, many of the forest characteristics in these Riparian Reserves more closely resembles upland forest than riparian forest. As such, those forests would see the same benefits from density management treatments as the uplands.

It's encouraging to see that the assessment on carbon acknowledges the role that long-lasting wood products, harvested from the project area, would play in storage. It is also refreshing to see that the District recognizes the improved sequestration potential resulting from density management treatments due to improved residual tree growth. AFRC firmly believes that active forest management and increased wood utilization is paramount to climate change mitigation.

We appreciate the consideration of tethered-assist logging systems in the Draft EA, something that we specifically requested in our pre-scoping comments. We would like to reiterate the fact that the effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. The terrain on the North Fork Smith project area fits this description. Tethered-assist logging is becoming a more economical, safe, and available method of yarding on steep slopes throughout the region. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. The Siuslaw has permitted this equipment to be used on Forest Service thinning stands on steep slopes in the past and we urge you to consider doing so on this project where appropriate to mitigate implementation obstacles.

Roads

Our main concern with the action alternative in the Draft EA is the proposed road decommissioning. AFRC is not opposed to all road decommissioning. Many previously constructed roads were placed in poor locations with outdated best management practices. Arterial roads that closely run adjacent to perennial streams or those that traverse unstable slopes should be targeted for decommissioning, particularly where their retention would add little value to future management needs.

However, the North Fork Smith EA proposes decommissioning of large segments of roads that do not appear to fit those categories. Roads located on or near ridgetops that facilitate cable yarding systems typically pose minimal resource threats. Such roads are critical to the future management of the Siuslaw National Forest. Several long segments of ridgetop road are targeted for decommissioning. Some of those roads, namely the 989, 990, 932, and 951 roads, primarily access proposed treatment units. Our assumption is that the Forest Service anticipates that this will be the final entry into those stands. However, the treatment units accessed by those road

segments are all proposed for medium thinning intensity that would retain 60 trees per acre (TPA).

We ask that the District reconsider the silvicultural prescriptions on those units (81, 89, 22, 33, 36, 41, 51, 57) and assess whether a prescription that retains 40 TPA would be more effective at putting these stands on a desired trajectory that would not necessitate additional reentries. If such a prescription alteration is not viable, consideration of road storage rather than road decommissioning should be considered.

The other notable ridgetop road segments proposed for decommissioning are the 921, 27, and 25 roads. These three segments all access stands that were deferred for treatment under this EA. Almost all of those deferred units (35, 141, 142, 144, 145, 148, 149, 150, 151, 152) were deferred due to “wildlife concerns.” This indicates to us that those units are likely in need of treatment to attain desired stand conditions, but wildlife species presence, namely the northern spotted owl, is precluding such treatment. However, owl presence, or any other wildlife species presence, is not static. Nor are the agencies policies toward managing their habitats static. Opportunities to treat these stands could very well be available in the near future. Decommissioning those roads now will preclude those opportunities.

We ask that the District reconsider the management of these roads and determine if road storage would be a more appropriate course of action to foster future management opportunities.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision-making process for the North Fork Smith EA. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or ageissler@amforest.org.

Sincerely,



Andy Geissler
Federal Timber Program Director
American Forest Resource Council