



DOUGLAS COUNTY COMMISSIONER TIM FREEMAN

1036 SE Douglas Ave., Room 217 ➔ Roseburg, Oregon 97470

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Submitted online at: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=59122>

Re: Douglas County Board of Commissioners' Comments on the North Fork Smith River Restoration Project and Draft Environmental Assessment

On behalf of the Douglas County Board of Commissioners (“Douglas County”), please accept the following comments on the U.S. Forest Service (“USFS”) North Fork Smith River Restoration Project and Draft Environmental Assessment (“NF Smith Project”). For the reasons provided herein, Douglas County urges the USFS to adopt the “proposed action” Alternative 2, with modifications, and implement the restoration of landscapes in the Smith River watershed.

Background

Douglas County is located in heavily-forested southwestern Oregon with approximately 112,000 residents. The County extends from the Pacific Ocean to 9,182-foot Mt. Thielsen in the Cascade Mountains. The economy of Douglas County is largely dominated by its vast timber resources. Douglas County contains nearly 2.8 million acres of commercial forest lands, including forests managed by the U.S. Forest Service, the Bureau of Land Management (“BLM”), private forest manufacturing and management firms, small landowners, and the County itself. Over 50% of the land area in the County is owned by the federal government and managed by the Forest Service or BLM, including lands owned and managed by the BLM under the Oregon and California Lands Act (O&C lands).

Douglas County has seen the decline of the timber industry in recent decades. Historically, the County received funds from the federal government tied to Forest Service and BLM timber sales. The federal government used a revenue-sharing formula from activities on federal land to partially compensate counties for the presence of untaxable, publicly owned land. However, timber harvest on federal lands has fallen dramatically, from 800 million board feet (mmbf) in 1989 to less than 90 mmbf in 2020, largely as a result of regulatory burdens, such as the listing of endangered and threatened species, designations of critical habitat, wild and scenic river designations, and the Northwest Forest Plan, which limits timber harvest opportunities. The negative, direct economic impacts to the County itself, and the negative socio-economic impacts



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across all the rural communities within the County, cannot be overstated. The human impacts have been drastic, far-reaching, and long-lasting. Just this year, Douglas County has been hit by mill closures due in large part to a lack of federal timber volume, including the closure of the C&D Lumber Co. mill in Riddle, Oregon, which eliminated 78 jobs, and the closure of the Rosboro Co. mill in Springfield, just north of Douglas County, eliminating 25 jobs.

Restrictions on forest management have also had a dramatic impact on wildfires. Limited harvest of green timber, as well as the limited salvage of burned timber, has led to an overstocking of the land base and a substantial increase in fuel loads and, consequently, large-scale wildfires. For instance, in the summer of 2013, the Douglas Complex Fire burned 48,679 acres to the north of the city of Glendale. That same summer, the Whiskey Fire burned 17,891 acres of forest in Douglas County in the Umpqua National Forest near the Loafer Timber Sale Project. In the summer of 2015, the Stouts Creek Fire burned 26,452 acres located to the south of the Loafer Timber Sale project. In the summer of 2017, the North Umpqua Complex Fires burned over 64,000 acres. In 2019, the Milepost 97 Fire burned 13,119 acres. During the extraordinary fire season of 2020, the Archie Creek Fire and Thielsen Fire collectively burned 141,517 acres. In 2021, fires in Douglas County burned *another* 140,000 acres, almost entirely on Federal land. This year, tens-of-thousands of acres have burned on federal land in Douglas County, with more likely to come.

Smoke from these wildfires impacts public health. These serious health impacts are an environmental justice issue that many rural counties throughout Oregon face because of the federal government's failure, or inability, to responsibly manage forests, due, in large part, to unnecessary and/or unwarranted restrictions that all center around critical habitat and the Northwest Forest Plan. In short, forest-management straying further from harvest opportunities has been nothing short of a complete failure and unmitigated disaster for the economies and social fabric of rural Western Oregon communities, and Douglas County is the epicenter of this catastrophe.

Forest management is a complex issue which has a substantial impact on rural communities. It is therefore crucial that the USFS develop projects that will improve ecological function while simultaneously bringing commercial value to local communities. The NF Smith Project is a step in the right direction, and therefore Douglas County urges the USFS to adopt Alternative 2, with modifications to improve the project's commercial utilization of forest products and habitat restoration.

Comments

Douglas County urges the USFS to consider the following comments on the NF Smith Project.

A. Regeneration or Higher-Intensity Harvest Should be Utilized on Matrix Lands.



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The Northwest Forest Plan identified approximately 3,975,300 acres of land for the “matrix” land use allocation. These “matrix” lands were outside of reserved allocations, and were intended to be where most timber harvest and silvicultural activities would occur.

The NF Smith Project contains around 2,086 acres of matrix lands. A proportion, but not all, of these lands are within Riparian Reserves. Nevertheless, the EA states that these matrix lands will be managed in the same manner as other land allocations, utilizing commercial thinning only to treat stands less than 80 years of age. Douglas County disagrees with this approach.

Where the matrix lands in the NF Smith Project fall outside of riparian reserves, Douglas County urges the Forest Service to implement more-intensive harvest prescriptions. As already stated herein, these matrix lands were identified as being suitable for commercial timber production in the Northwest Forest Plan. Thus, the matrix should be managed for commercial timber production, rejecting the management approaches used in the Late Successional Reserves (“LSR”). There are a multitude of benefits that would flow from the use of intensive harvest prescriptions on matrix lands. Intense prescriptions on matrix lands would increase the volume of commercial timber products returned from USFS land. In light of recent mill closures due to depressed timber volumes, it is crucial that the USFS work to increase the commercial utilization of its forests. Forest products are the lifeblood of rural communities, and without federal forest products family-wage jobs disappear from rural communities.¹

There are other non-commercial benefits that would flow from greater-intensity harvest of matrix lands within the NF Smith Project. It has been well established that western Oregon federal forests do not provide basic nutritional requirements for species like elk. Rowland, M.M., et al. 2018. *Modeling elk nutrition and habitat use in western Oregon and Washington*. Wildlife Monographs 199:1-69. In their study, Rowland et al. found that sufficient “dietary digestible energy” (“DDE”), a measure of the basic nutritional requirements for elk, was nearly nonexistent on western Oregon federal lands. *Id.* Rowland et al. concluded that “[t]his bleak nutritional

¹ The closure of the C&D mill in Riddle, Oregon, is devastating to that community. The population of Riddle is only 1,200, and the C&D mill closure eliminated 78 jobs. Riddle is surrounded by federal forest lands. Yet, a driving reason behind the mill’s closure was a lack of reliable timber supply which made it “impossible to envision a sustainable future for the company.” Madison Yeash, *C&D Lumber Co. announces permanent closure*, KEZI (Apr. 7, 2024) https://www.kezi.com/news/c-d-lumber-co-announces-permanent-closure/article_5ccb08ca-f52e-11ee-bb8c-138d49df0b84.html. Likewise, the closure of the Rosboro mill in Springfield is due to unaffordable log prices—a product of too few logs available for mills. Zach Urness, *Rosboro timber company temporarily closes Springfield mill and lays off 25*, Salem Statesman Journal (Feb. 9, 2024) <https://www.registerguard.com/story/news/2024/02/09/oregon-timber-company-rosboro-temporarily-closes-mill-layoff/72541027007/>. The USFS can, and must, play a central role in alleviating the supply chain issues that are causing these mill closures.



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environment for elk in summer not only contributes to reduced elk performance but also may contribute to long-term shifts in elk distribution to areas providing better nutrition.” *Id.* While federal lands fail to provide basic nutritional requirements for elk, private lands utilizing regeneration harvest fare much better, providing approximately 4.6 times *more* DDE and greatly improved bodyfat percentages for lactating female elk. *Id.*

Regeneration harvest creates substantially more DDE than commercial thinning. *Id.* Thus, the Forest Service’s interest in providing habitat for Roosevelt elk can best be accomplished by implementing regeneration harvest—or, at minimum, high-intensity thinning—across the matrix land use allocation. Currently the Siuslaw National Forest fails to provide sufficient DDE for resident elk populations, and implementing intense harvest prescriptions on matrix lands would bring significant improvements to elk herd health. This would have downstream benefits on other wildlife that predate on elk, as well as communities which benefit from wildlife-related tourism, including hunting.

In short, numerous benefits would come from greater commercial utilization of matrix lands within the NF Smith Project. Given the small percent of the project area within non-riparian reserve matrix allocations, modifying Alternative 2 in the manner described above would not change the project’s environmental effects. Douglas County therefore urges the USFS to modify current Alternative 2 to implement regeneration harvest on the matrix lands that are not within the riparian reserves in the NF Smith Project.

B. Commercial Thinning in LSR’s is Vital for Ecosystem Resilience and Community Wellbeing.

There is a tremendous need to implement commercial thinning across large swaths of the Siuslaw National Forest. Commercial thinning can have widespread benefits for ecosystem resilience. It will reduce coarse woody fuels and crown density, resulting in reduced risk of catastrophic stand-replacing wildfire. This is crucial for spotted owls, which are at greater risk of habitat loss from *wildfire* than from the utilization of forest products. Commercial thinning also will improve structural diversity within the forest, resulting in improved growth among the trees retained, and more old-growth characteristics, as analyzed in the EA. Moreover, while commercial thinning does not create the same nutritional improvements as regeneration harvest, it does nevertheless improve nutrient density from baseline levels, which has significant benefits for large ungulates like deer and elk, and their predators.

Furthermore, commercial harvest in LSRs will benefit local communities. As explained herein, rural communities were extremely damaged by the adoption of the Northwest Forest Plan, and continue to be depressed by the unavailability of federal forest products. Three decades later, and the Northwest Forest Plan—in particular, the allocation of LSRs—is still contributing to mill closures across Oregon. This continuing harm can, and should, be avoided. As explained herein



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and recognized in the EA, there are many ecological benefits that come from the commercial thinning of LSRs. There is no reason not to expand commercial thinning efforts in LSRs, alleviating the economic harms caused by the Northwest Forest Plan while simultaneously improving habitat complexity and value for the numerous species residing in the Siuslaw National Forest. For that reason, Douglas County urges the Forest Service to both expand the scope and intensity of the commercial thinning planned in the NF Smith Project. Currently, the project proposes to defer (no treat) 64 percent of the project area, and thin to a density of greater-than-or-equal-to 40 percent canopy cover. The Forest Service should increase the acreage of its commercial thinning across the project area, and ensure that thinning is accomplished such that no more than 40 percent canopy cover is left, on average (accounting for skips and gaps).

For these reasons Douglas County generally supports Alternative 2, and the commercial thinning of LSRs, but urges the USFS to modify Alternative 2 by increasing thinning intensity and scope across the project area.

Conclusion

Douglas County appreciates the opportunity to submit these comments for the agency's consideration. Consistent with the foregoing Douglas County strongly urges the Forest Service to adopt a modified Alternative 2, and proceed with the NF Smith River project.

Sincerely,

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Douglas County Commissioner

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