April 29, 2024

Molly Juillerat
Middle Fork District Ranger
Willamette National Forest
46375 Highway 58
Westfir, OR 97492

In Reply To: Middle Fork Fire Affected Roads Scoping

Dear Ms. Juillerat:

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.

It's difficult to grasp the enormity of what the District and the Forest must now undertake to rehabilitate the forest lands which have been lost to wildfire over the past four summers. When the Ranger District first scoped this project back in 2022, we applauded the District's ability to initiate scoping for a roadside hazard EA in the same calendar year as the fire itself. At the time, the Region was still grappling with being able to remove roadside hazards in a timeline which offered merchantable material to local purchasers. The First iteration of this project marked a turning point for the Region and offered an example for other Forests to follow to make ground on this issue. After two years and another large fire, the Forest is still grappling with an issue that won't wait around for novel ideas. We still applaud the District for their outside-the-box thinking and creative problem-solving, and we are generally pleased to see the Forest include those acres impacted by the 2023 Bedrock Fire into the scope of the original Cedar-Gales Roadside Risk

Reduction. In general, we view this as the most logical and timely means of treating the additional burned acres. We hope, through this effort, that the Forest can treat these acres while there is still merchantable volume to recover. Not only is this material critical for AFRC members to stay in business, continue to fund family-waged jobs, and to produce long-lasting wood products that society needs; but it is work that must be completed before the hard work of rehabilitating these acres can begin.

Project Scope

That said, we are generally disappointed that this plan will treat such a small footprint of the 2021, 2022, and 2023 fires. Assuming a 100-ft buffer is treated across the entire 140 miles of proposed road in this letter (which is optimistic), this plan will only treat about 7% of the burned area from these fires. This means that the vast majority of burned timberlands from 2021-2023 will succumb to the same fate as the areas affected in 2020: watersheds will choke, standing timber will deteriorate and become unusable, centuries-old forests will become brush fields, and large swaths of the Forest will become net carbon emitters. **We recommend that the project area for this EA includes all roadways affected by the 2021, 2022, and 2023, as well as any Matrix LUA within these fire footprints.**

Material Utilization

Since the Forest has begun implementing hazard reduction treatments under the original Cedar-Gales EA, it has come to our attention that contracts along those roadways limit removal of material only within the 100-ft treatment buffer. In other words, trees which are 150 feet tall and must be felled for public safety are dropped towards the road, and the tree is immediately bucked 50 feet into the butt log before the remaining top can be utilized – leaving the largest and most valuable section of the tree on the land. Not only is this practice enormously wasteful, but it runs counter to your scoping notice's stated "need" to reduce hazardous fuel levels along the road system. This restriction minimizes any benefit of fuel reduction to the smallest possible extent in the project area.

We can only assume that your rationale for retaining this material has something to do with your statement on page 3: "Balance is found between fuel levels along roads and habitat provided by sufficient snags and coarse woody debris." Again, we understand that the Forest must account for many resource effects when planning projects; but it's difficult to argue that this is what "balance" looks like. If this project is implemented to its fullest effect, then well over 90 percent of the forest lost to these fires (about 170,000 acres) will be left to recover without timber harvest. Across these tens of thousands of acres, the Forest will assuredly reach their plan objectives for snags and downed woody debris which will continue to accumulate unchecked for the foreseeable future. "Balance" should allow contractors to utilize this material to its fullest extent within the small area that they are working, allowing what remains to contribute towards the Forest's goals for retention.

We urge the Middle Fork Ranger District to allow removal of any whole tree felled for the purposes of this project at the discretion of the purchaser.

PURPOSE AND NEED

We were disappointed when this project's original proposal did not include production of commercial timber as a *need* for this project – essentially ignoring the role that local manufacturers play in helping the Forest recover from these fires. We remain disappointed to see that the revised proposal also does not list commercial timber production as a project *need*. We believe commercial harvest will not only produce the greatest intended result in terms of fuel reduction, but this will also generate usable forest products for our members who rely on the Forest to manage these lands for timber production. This is especially true of the large sections of Matrix LUA that were involved in both fire footprints. Treatments here should focus both on danger tree removal and commercial harvest. **We recommend that commercial timber harvest be included as a need of this EA.**

DANGER-TREE IDENTIFICATION

We are concerned that the Forest may not be properly assessing which trees have the potential to strike the roadway. Current guidelines for identifying and addressing hazard trees on U.S. Forest Service land are included in the Field Guide for Danger-Tree Identification and Response along Forest Roads and Work Sites in Oregon and Washington, 2016. That Field Guide includes various specifics on how to identify hazard trees in the context of their proximity to roads, campgrounds, and other potential target areas. Pages 38-42 include specifics on identifying Potential-Failure Zones. Copied below is the guidance for trees on level and sloped ground.

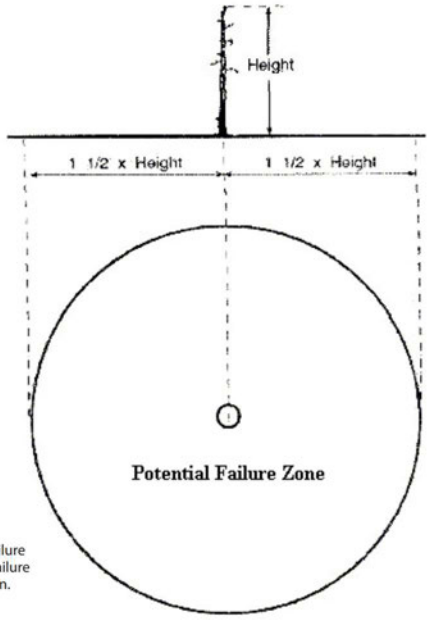

Fig. 7 – Potential-failure zone for total tree failure with no slope or lean.

Level or sloped ground with no lean

On level ground, the potential-failure zone is a circle around the tree with a radius equal to 1 ½ times the total tree height (Fig. 7). On sloped ground, the failure zone downhill from the tree should be extended whatever distance is necessary to protect people from sliding or rolling trees (Fig. 8).

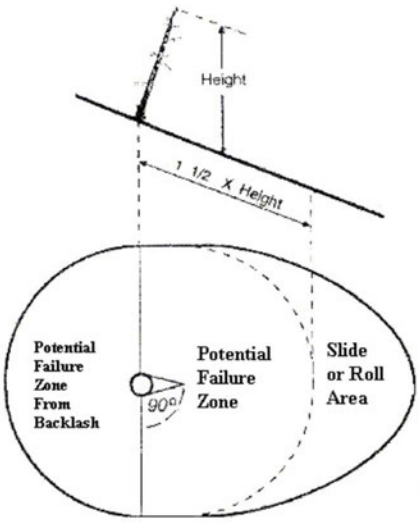

Fig. 8 – Potential-failure zone for total tree failure with slope and lean.

This guidance clearly indicates a potential failure zone of at least 1 ½ times the damaged tree. For trees experiencing 100% mortality, this would be 1 ½ times the height of the tree. Additionally, this guideline shows the area opposite the tree's lean should also be considered as potentially within the failure zone.

Yet the Willamette National Forest has opted to ignore this guidance and instead adopt a design feature where "a 100-foot-tall tree within 90-feet of the road would be fallen. However, should that same tree be 110-feet away from the road it would be left standing" and "Trees with greater than 25% lean away from the road are not to be cut." Under these two scenarios, it will be likely that hazard trees within the failure zone of an open road will be left standing. **Please explain why the Forest Service has decided to design this project in contradiction with your current guidelines when public safety and access are at risk?**

We are pleased to see the Forest include modifications to the R6 Danger Tree Guide to better reflect real-world conditions – particularly concerning the removal of dead Douglas-fir. We are similarly pleased to see flexibility in allowing the removal of some living trees showing signs of imminent mortality. Salvage sales often focus too heavily on restricting hazard tree selection to dead trees only without accounting for latent mortality in the remaining green trees. The result of this is a hazard reduction that is effective for the first few years following harvest, but eventually ineffective as mortality manifests itself. By including this flexibility, the Forest is ensuring that these roadways remain safe for years to come.

DETERMINATION OF TREATMENT

When this project first scoped, we expressed that the Forest may be relying too heavily on RAVG data to determine treatment need within the footprints of these fires. From your language in the revised proposal, it seems that hasn't changed. We remain skeptical of RAVG's ability to determine project priorities. Specifically, the RAVG data only captures a snapshot of mortality at a single point in time. There is no adjustment that captures latent mortality which will continue to increase over time. This may lead to segments of road being deferred for treatment that will require treatment once operations begin. Understandably, the Forest is utilizing remote sensing indices to

help expedite the process of identifying the need for treatment across these fire footprints. We applaud the Forest for taking advantage of time-saving tools to prioritize treatment; **but there should be follow up on the ground so the Forest can effectively treat the burned area. Additionally, we urge the Forest to update any RAVG data that they acquired during initial scoping to the most recent data available to account for some of the delayed mortality.**

We also disagree that the Forest should limit treatment to road segments in areas that experience 25% mortality or higher. To justify deferring treatment in areas with less than 25% mortality, the Forest maintains: "In these areas, the conditions are expected to be similar to those of Forest roads unaffected by fire which naturally and regularly experience low levels of tree mortality." (pg. 6). Is 25% mortality considered typical across the Forest? If so, isn't it safe to assume that the Forest was experiencing the same rate of mortality prior to the fire, and any disturbance would result in an increase in mortality to that same area? Our concern is, again, that the Forest is deferring treatment in areas where mortality is unnaturally high. We maintain that any area that experienced fire-induced mortality should be treated in order to preserve the roadway and to ensure that wood can be sold and utilized as usable timber, rather than being removed as a cost to the Forest. **We recommend that any road segment that experiences fire should be proposed for treatment in this EA.**

If the Forest Service does complete the EA in a prompt manner and is able to capture some timber value from the fire-damaged trees we urge you to acknowledge that **standard utilization specifications used on green Forest Service timber sales will not likely be appropriate for any salvage sales generated from this EA**. Due to the damaged nature of the timber products being proposed for harvest, there will be an unusually high level of uncertainty by the Forest Service and prospective purchasers of the actual value of those products on the stump prior to harvest. This uncertainly is exacerbated by the fact that additional time for wood deterioration will elapse between the time of purchase and the time of harvest. Therefore, the Forest Service should be developing minimum removal requirements and utilization specifications that align with this uncertainly. Purchasers will recover as much value from these damaged products as possible. Required them to recover value that is not available will reduce the likelihood that these sales will successfully sell.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision-making process for Middle Fork Fire Affected Roads EA. Should you have any questions regarding the above comments, please contact me at [redacted] or cbingaman@amforest.org.

Sincerely,

[redacted]

Corey Bingaman
Western Oregon Field Coordinator
American Forest Resource Council