



January 8, 2025

Hilary Henry  
Sweet Home District Planner  
Willamette National Forest  
4431 Highway 20  
Sweet Home, OR 97386

**In Reply To:** Upper Canyon Draft EA Comments

Dear Ms. Henry:

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 Sweet Home Ranger District (SHRD) proposing treatments that will provide useful timber products to our members on lands allocated as Adaptive Management and Riparian Reserve. Those acres within Riparian Reserves are in particular need for treatment. The same dense forest conditions present in the uplands also exist in these reserves. In fact, due to the extensive size of the riparian buffers, particularly on intermittent and ephemeral streams, their reach extends far beyond "riparian" areas and consumes much of the uplands. Density management prescriptions identical to those in the uplands are warranted and appropriate beyond the immediate "no-cut" buffers of these small streams.

## **SUSTAINABLE FOREST MANAGEMENT**

AFRC is also pleased to see the (SHRD) include a need to "provide a sustainable supply of timber products" for the Upper Canyon EA. Our members depend on a predictable and economical supply of

timber products off federal land to run their businesses and to provide useful wood products to the American public, and we thank the SHRD for continuing to provide this supply. The long-term sustainability of these timber products is crucial for the long-term viability of our membership and the communities they support. We appreciate the SHRD proposing treatments that will yield wood products our members can utilize. We are glad to see a purpose & need that clearly describes the statutory direction that the USFS is under that requires timber resources to be managed in a sustainable manner.

We are disappointed, however, that the SHRD is not considering an alternative which prioritizes regeneration harvest as a means to achieve the Agency's statutory obligation to provide sustainable wood products to local purchasers. The "thinning only" vegetation management paradigm which the Agency has operated under in Western Oregon for the past three decades has not only been damaging to the local timber-dependent economy, but it has been an insufficient tool in terms of bringing national forests back into a historic range of variability.

Your EA recognizes that the project's planning area is lacking complex early seral habitat. By your own account, only three percent of the federally-owned forest in the project area is classified in the "Stand Initiation – Young Plantation (0-30 years old)" age class. Within that three percent, young plantations provide the bulk of that age class distribution. The interspersed private lands, which account for approximately 32 percent of the project area, exist in a similar single-story single-aged forest type dominated by Douglas-fir. In other words, there is virtually no complex early seral habitat within the Upper Canyon project area. Your proposal to create 100 acres of gaps may produce early seral habitat at a small scale in the planning area, but it will not meet the plan's stated *need* to promote diversity and structural complexity at the landscape scale.

You justify your decision to defer regeneration harvest in your EA with the following statement: *The Forest Plan standards and guidelines for Timber Management FW-182 direct us to use regeneration harvest when stands have "reached or surpassed 95 percent of culmination of mean annual increment (CMAI)".* (Upper Canyon EA, Pages 7-8). But you leave out the entire guideline which states: *Timber should not be harvested until it has reached or surpassed 95 percent of culmination of mean annual increment (CMAI) in cubic feet. Exceptions may be made for commercial thinning, or where special resource considerations require earlier harvest* (WNF FPS Page IV-74).

We agree that sustainable forest management should abide by the target of harvesting at culmination. Unfortunately, the survey and manage standards in the northwest forest plan for stands 80 years and older effectively precludes the ability of federal land managers to employ regeneration harvest in stands once they reach CMAI. From our perspective, this reality represents a "special resource consideration", as noted in your Forest Plan, and should grant the RD flexibility in choosing when to employ regeneration harvest. **We urge the SHRD to reconsider deferring regeneration harvest in the Upper Canyon EA, or to include an alternative which allows regeneration harvest to attain the project's stated purpose and needs.**

## ROAD DECOMMISSIONING

Your scoping notice lists road decommissioning as a project proposal. AFRC recommends that if any road decommissioning does result from this EA, only roads which are no longer needed for resource management and are at risk of failure or are contributing sediment to streams should be considered for removal. The land base covered in the Upper Canyon project area is to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

## **PIT DEVELOPMENT**

We are pleased to see the SHRD propose the use of existing rock quarries as sources for the development of suitable material for road surfaces. Costs associated with hauling rock long distances have been escalating in recent years and often represents a significant cost in timber sale implementation for our members. In fact, this spike in cost has recently been identified by several purchasers as a primary contributor to sales going no-bid within the Region. This allowance will be critical for projects resulting from this analysis to be economically feasible and viable for purchasers.

## **WET SEASON HAUL**

We are pleased to see the SHRD allow haul during the wet season (October 16 to May 14) along rocked roads which meet the design standards for being able to support wet weather haul. (PDF-ID: Aquatics 21 (a)). Proper road design and layout should pose little to no negative impacts on water quality or slope stability during wet weather hauling. 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.

## **CLIMATE CHANGE**

We appreciate the analysis on climate change and carbon. In particular, we appreciate the acknowledgement in the EA that harvested timber and long-lasting wood products play an important role in overall carbon storage. AFRC believes that active forest management and wood product utilization are integral components of the global challenge of climate change mitigation. We are also pleased that the SHRD recognized the importance of density management treatments and how they will accelerate the growth rate of residual trees, which, in conjunction with carbon storage in harvested wood products, will maximize the carbon sequestration potential of the treated acres.

AFRC is happy to be involved in the planning, Environmental Assessment, and decision-making process for the Upper Canyon Project. Should you have any questions regarding the above comments, please contact me any time at 541-521-9143 or [cbingaman@amforest.org](mailto:cbingaman@amforest.org).

Sincerely,



Corey Bingaman

Western Oregon Field Coordinator  
American Forest Resource Council