Associated Oregon Loggers, Inc. • P.O. Box 12339, Salem, OR 97309
503/364-1330 • fax 503/364-0836 • email: rstorm@oregonloggers.org

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Becki Heath, Deputy Regional Forester
Marie Louise Smith, Director Natural Resources - FPM
Nicholas Goldstein, Legislative Affairs Specialist - EADM
Aly Warren, Asst. Director Natural Resources - FPM
US Forest Service
1220 SW Third Ave; Portland, OR 97204-3440

Email: blheath@fs.fed.us/ marielouisesmith@fs.fed.us/ nicholasrgoldstein@fs.fed.us/ alysonwarren@fs.fed.us

RE: Regional Improvement Initiatives in Oregon
-- Environmental Analysis & Decision Making Initiative (EADM)
-- Forest Products Modernization Strategy (FPM)
-- Forest Plan Revision
-- Logging/Transportation/Operational Systems Reboot
-- Eastern Oregon Socio-Economic Sustainability

Dear Becki, ML, Nick, and Aly:

This letter is submitted to provide recommendations to the US Forest Service PNW Region, addressing Oregon's eleven national forests, particularly regarding two agency improvement efforts: A) Environmental Analysis & Decision Making Initiative (EADM); and B) Forest Products Modernization Strategy (FPM). Furthermore, we have addressed three additional recommendations that are closely-related to the EADM and FPM, including: and C) Forest plan revision; D) Logging/transportation systems reboot; and E) Eastern Oregon economic sustainability.

I am writing on behalf of Associated Oregon Loggers, Inc. (AOL), which represents more than 1,000 logging and allied forest member companies statewide. These companies play a major role in management of private & public forests throughout Oregon— as contractors, purchasers, transporters, and vendors of forest management services (operators). AOL member companies commonly sub-contract or purchase Forest Service forestry, restoration, improvement, protection, and roading contracts. As such, AOL represents substantial expertise in forest management.

The future sustainability and growth of AOL member businesses is directly impacted by whether significant improvement can soon be achieved in statewide US Forest Service programs of environmental analysis decision-making, forest product modernization, and forest plan revision. These three programs have become unreasonably inefficient, costly, and untimely. We encourage effective national forest projects that promote accelerated active management of Oregon's federal forests through sawlog harvest, regeneration, managed growth, and forest protection— especially via the restoration of increasingly-overcrowded and unhealthy forests. AOL operator businesses and forest sector manufacturers (collectively, sector "infrastructure") seek a more reliable quantity of viable forest management projects and valued timber supply that would fund accelerated forest restoration on Oregon's 14.2 million acres of national forests (47% of all Oregon forestlands).

The future sustainability of Oregon's eleven national forests—and their now-declining condition—is dependent on the viability and sustainable growth of the private forest sector infrastructure statewide, located in several key working circles. We are keenly concerned for the future of the now-declining ecosystem health and eroding condition of Oregon's national forests, and the surrounding natural resource-producing communities. Regrettably, because of nearly three decades of declining (and less reliable) national forest management, Oregon's private forest sector infrastructure statewide continues to experience declining investment and productive capacity. In parallel, the rural national forest communities also continue to have declining resiliency, investment, workforce, and vitality. And, I sense that further harmful forest infrastructure attrition is imminent in Oregon, without urgent improvement in US Forest Service land management project quantity, value, and certainty. This urgency is especially urgent in eastern and southwest Oregon, where forest sector disinvestment and rural community privation has been chronic and become dire— largely related to waning national forest project viability and quantity.

Oregon national forest future providence is dependent on the capacity of their nearby private forest sector and rural communities. Frankly, Oregon national forests and their future managed condition will rely on the agency's transformed recognition that the socio-economic vitality of private forest sector infrastructure must urgently become a vitally-important driver in all forest planning and project decision making. The true sustainable future of Oregon national forests—more than any other issue today—is wedded to a markedly improved socio-economic well-being of private forest sector infrastructure and expanded economic development within its tributary rural communities.

Were we to ignore addressing these serious socio-economic realities today in Oregon national forest management, then too many key working circles would predictably suffer the supporting forest sector exodus experienced in the US four-corner states of AZ, NM, UT, and CO (where negligible forest infrastructure remains). There once existed a robust forest sector in those states; but prohibitionary national forest management since 1990 has resulted in its tragic elimination. In those four-corner states, today tens of millions of acres of national forests are in a calamitous status and wanting for economic partners and markets to aid in US Forest Service land management to remedy the forest health calamity. This same fate would be a preventable and unacceptable outcome for Oregon's eleven national forests. Later in this letter, I address a few particulars of weakening socio-economic status surrounding Eastern Oregon's six national forests (which also are relevant to SW OR forests).

We suggest that the agency consider the following key working circles in your future augmented socio-economic evaluation of effects of Oregon national forest management decision making:

Blue Mountains*	Malheur, Umatilla, Wallowa-Whitman, Ochoco: Emigrant
Central East*	Deschutes, Ochoco
Klamath*	Fremont-Winema
Southwest*	Rogue-Siskiyou, Umpqua
South Coast*	Siskiyou: Gold Beach, Powers
North Coast	Siuslaw
Valley Cascade	Mt. Hood, Willamette

*working circles where USFS contributes to extraordinary socio-economic distress

The continued decay of Oregon national forest management during the past three decades has damaged the USFS agency's relationship with its important partners and cooperators. These partnerships, while still existing to a compromised degree, are necessary to foster effective national forest programs, projects and desired future conditions for sustainable forests. These partnerships are principally communities of place, those individuals, entities and organizations that have local and socio-economic vesting in national forest outcomes. As much USFS emphasis has wandered toward ecological preeminence since 1990, these important socio-economic relationships have at best been discounted, and at worst neglected. One of the greatest challenges ahead for the EADM and FPM initiatives will be to improve the tarnished partner relationships that have been severely disrespected by chronic Forest Service inefficiencies and failures at delivering effective forest management outcomes important to these important Oregon partners.

The partnerships, for which improved agency decision making should aim to strengthen, may include:

- County governments and school districts
- Local governments, such as cities, rural fire districts, municipal water districts, special taxing districts, irrigation districts
- Oregon Dept. of Forestry fire division (statewide, protect 47% of forests, regulates all burning)
- Oregon state agencies dealing with air quality, smoke & human health, emergency management, fire management (DEQ, OHA, OEM, Fire Marshal)
- Other non-federal governments/land managers, such as tribal, county, state forest, state agency
- Private property owning neighbors situated within the Federal-Private Interface zone (FPI)
- Rural residential owning neighbors situated within the Wildland-Urban Interface zone (WUI)
- Forest sector (purchasers, landowners, contractors, service providers, vendors)
- Ranching sector (permittees, landowners, grazing, irrigation, service providers, vendors)
- Destination site recreation users
- Motorized recreation users
- Non-motorized recreation users
- Mineral, mining, energy producers
- Utility rights-of-way holders
- Private property owning in-holders surrounded by national forests
- Special use holders of easements, agreements, licensees

While the two agency improvement efforts—EADM and FPM— are leading initiatives to upgrade USFS forest management effectiveness, these efforts must necessarily include considerations for three additional integrally-connected matters that currently impact your capability to manage. We encourage you to also address the inter-relationships of EADM and FPM within these added important programs:

- Forest plan revision;
- Logging/transportation systems reboot (operational systems); and
- Eastern Oregon socio-economic sustainability.

It is our concern that the EADM and FPM cannot be independently successful in Oregon without the Region's mangers concurrently addressing the grim disruptive status of cobbled forest plans, deficient operational systems expertise, and fragile economic infrastructure in Oregon's Eastside.

Our comments are intended in the spirit of our long-standing cooperation and partnership with the Forest Service, and for the purpose of increasing efficiency of the agency's outdated procedures and organizational customs that encumber your sought-after improvement in decision-making, forest product programs, socio-economic contributions, and planning for projects-forest plans. Please consider AOL's recommendations, which are organized by the five categories mentioned above.

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B. Forest Products Modernization Strategy (FPM)
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A. Environmental Analysis & Decision Making Initiative (EADM)

Deficiency / Barrier	**Recommendation**
Decision-makers lack empowerment	Delegate more authority to local decision makers
Socio-economic discouraged by agency culture	Decision makers rewarded for risk-taking and action
Risk-aversion rewarded by agency culture	Managers receive training in socio-economics & operations
Risk-aversion=inaction=land neglect	Empower managers to balance socio-econ with environment
Decision makers lack authority & responsibility	Manager decisions rewarded to know/respect neighbor values
Managers lack socio-econ training/experience	
Economic value/operational feasibility lacks	
Managers fail to understand neighbors	
No action alternative is wrongly 'status quo'	No action alternative address expected effects; include decline
Current NEPA says "do nothing"	NEPA says No action expected decline in environment occurs
Current NEPA neglects idling consequences	NEPA says No action expected decline socio-economic occurs
Balance of harms fail to be weighed	Authorize and reward effective 'balance of harms' assess
Currently: risk-avoid all short-term impact	Seek less short-term impact for greater long-term benefit
Currently: long-term benefits foregone	Create simple 'balance of harms' tests in NEPA
Currently: desired futures are unachievable	
Current high costs assure higher future costs	
Precautionary principle hobbles future	Authorize and reward effective tradeoff assessment/test
Current risk-avoidance forgoes long-term benefits	Favor action to learn and accomplish; alter in NEPA
Analysis paralysis due to inaction	Use current expertise and known science to act now
Err on side on inaction	Err on side on action and learning from experience
Endless wait for more/better information	Project implemented to gain experience/improve
Costly delays and analyses	Cost overruns consume limited staff/budget
Remain uninformed/inexperienced	Continuous improvement/learning
Projects not implemented	Projects implemented

Deficiency / Barrier	**Recommendation**
Pre-eminence of environmental values	Authorize and reward effective tradeoff envi vs. econ
Environment values trammel socio-economic	Both environment AND socio-economic values thrive
Socio-economic outcomes unimportant/decline	Socio-economic outcomes increase
Environment values harmed long-term	Environment values improve long-term
Scarce economic outputs to generate funds	Robust economic outputs pay for environment projects
Environment projects lack funding to achieve	Environment projects are funded & achieved
Forest road access valued as a liability	Forest access valued as essential asset management tool
Roads devalued as an environmental harm	Roads useful & necessary for administration & socio-economic
Goals to decommission/eliminate roads	Many valued options to manage roads in a closed/hold status
Fail to search for means to maintain roads	Conduct roads cost vs. value tradeoff tests in planning
Managed roads not in vocabulary	Sustainable forests demand future access; firefight access
Eliminate roads rather than manage roads	Expand types of road management/classification
Tradeoff analysis lacking	Reform project planning procedures
Prescription/restriction costly w/o benefit	Conduct benefit/cost analysis of Rx and project
Planners uninformed of operating reality	Conduct cost vs. value tradeoff test in planning
Planners uninformed of economic reality	Restructure staff balance of expertise
Planners uninformed of balance of harms	Adjust mix of staff who plan projects
Planners uninformed of access feasibility	Train staff in need compliment of topics
Planners/managers fail to integrate Rx	Train decision makers in balance of topics
Interdisciplinary teams are imbalanced	Planning teams re-balanced to include 12 disciplines:
Currently biased toward ecological	1. Socio-economic: Economic;contract;budget;costs;Nepa
Currently deficient in socio-economic	2. Socio-economic: Logging/transport; layout; operations
Resulting plans/decisions imbalanced	3. Socio-economic: Engineer/facilities; access; trail; road
Resulting decisions uneconomical	4. Socio-economic: Users; recreation; security; publics
Resulting decisions infeasible	5. Socio-economic: Real estate;neighbor;easement;survey
Resulting decisions ineffective	6. Socio-economic: As-need: graze;cultural;irrigate;mine
Resulting decisions fail at desired results	1. Environment: Wildlife; habitat; terrestrial
Resulting decisions achieve less resources	2. Environment: Riparian; fish; amphibian
Resulting decision support by fewer people	3. Environment: Hydrology; soils; erosion; geology
Resulting decisions have more conflict	4. Environment: Botany; ecology; TES species; invasive
Resulting decisions sap $$ from other work	5. Environment: Silviculture; reforest; vegetation; pests
Resulting decisions limit future options	6. Environment: Fire; fuels; burning; hazards
Too few socio-economic team members	Project teams of 50% socio-economic; 50% environment
Too many environmental team members	Agency to re-balance; re-train staff to get 50-50 balance
Organization staffing imbalanced	Re-structure staff balance to include 12 disciplines(above)
Too few socio-economic staff/skills	Train staff to include needed balance of expertise/skill-set
Too few operational-experience staff/skills	Train decision makers in balance of topics
Missing skill sets on most every forest	Decision maker training in socio-economic/operational skills
Too many environmental staff/skills	
Decision makers uninformed in socio-economics	

Deficiency / Barrier	**Recommendation**
Lack uniformity to achieve NEPA sufficiency	NEPA format/content has effective standardization
Each NEPA document different	NEPA costs less / needs less staff to complete
No NEPA standardization among forest/districts	Documents/analyses have legal sufficiency
"Re-invent the wheel" every NEPA	Experience-proven NEPA documents
Legal errors created every project	Uniformity of legally-sound/replicated documents
Current objection/NEPA allows ease to stall	Codify greater legal sufficiency in NEPA decisions
Exhaust funds/time on NEPA	Reduce ease of objection & litigation by detractors
Few funds/staff remain to implement project	More funds available to implement projects
Fewer projects implemented; more delayed	More land management occurs
FS avoids projects with controversy threat	Controversial projects can proceed with learning
Opponents can blackmail FS into inaction	
No expedited process for urgent projects	Codify NEPA legal sufficiency for urgent needs
Opponents can easily delay urgent projects	Create local emergency project authority for action
Urgent projects fail; due to delay	Reduce ease of objection & litigation by detractors
NEPA now untimely for forest health needs	Urgent restoration, salvage, reforestation happens
Wasted value; wasted opportunity	More funds to implement; more land management occurs
Socio-economic value foregone by delay/inaction	Huge increase in funds socio-economics for projects
No simple/expedited process to restore damage	Codify procedures to allow forests to restore damages
Dead trees wasted; restoration never happens	Procedural & NEPA legal sufficiency for urgent needs
Forestland becomes fallow; unsustainable	Create new 'emergency authority' local project quick action
No treat: pest/wildfire/disease/storm/flood	Urgent restoration, salvage, reforestation happens
Increasing acreage of deforestation	Current deforestation backlog begins to be reduced
Long-term; more land unproductive	Future forests grown from current damaged forests
Urgent projects fail, due to delay	Reduce ease of objection & litigation by detractors
NEPA now untimely for restoration needs	Streamlined means to decide and implement
Wasted value; wasted opportunity	More funds to implement; more land management occurs
Socio-economic value foregone	Huge increase in fund/socio-economics for projects
Trust broken for local community	Regain local community trust
Decisions unaware/discount neighbors **1)**	New day when USFS actions consider neighbor values **1)**
Managers fail to understand neighbors	Manager decisions rewarded to know/respect neighbor values
Federal-Private Interface values not considered	Decision making weighs federal impacts on neighboring lands
USFS actions neglect fed impacts on neighbors	NEPA decisions consider USFS inaction/action on neighbors
Cohesive Wildfire Strategy fails to look inside	Federal-Private Interface (FPI) very important to private sector
Fed sovereign immunity creates 1-way street	Passive fed management has adverse consequence to neighbors
This is not "WUI"; rather it's all neighbors	USFS informed about protection cost of neighbors
Cohesive Wildfire Strategy NOT the answer	

1) FOOTNOTE: *"Federal-Private Interface" Injures Non-Federal Neighbors*

Along the thousands of miles of Oregon federal forest boundary shared with non-federal neighbors, current federal forest policies increasingly adversely impact their neighbors--and transfer risk from the federal lands to the non-federal neighbors. For example, the long-term average of US Forest Service-borne wildfires burn 80% of the annual forest acreage of wildfires--even though the USFS protects only half of Oregon's forest acreage. This disproportionate impact demonstrates how federal forest policies extend beyond their federal boundaries--to those forestlands which the Board has jurisdiction to protect.

Deficiency / Barrier	**Recommendation**
Wildfire smoke impacts not weighed	Decisions consider USFS wildfire smoke/other impacts off NF
Off-forest impact of USFS inaction/project ignored	USFS policy altered so NEPA addresses FS impact on neighbors
NEPA fails to address wildfire in unhealthy forest	NEPA address wildfire probability on unhealthy forest
NEPA fails to address predicted wildfire impact	NEPA address predicted wildfire impacts/consequences
Diameter limits (21.0" dbh) cripple projects	Regional Office rescind 21.0" metric; replace with 30"
Applies to all eastside forests	Raise the metric; and expand local authority to drop it
1996 "temporary" screens codified by EA	Codify with the same EA as original 1996 decision
Artificial, not science- based, nor integrated	Future forest plan revision can refine the new 30" metric
Outdated; divisive to harm local trust	Update to make contemporary, rather than "temporary"
Hobbles many projects to render infeasibility	Improve project opportunity/feasibility; more acres viable
Directly reduces restoration scope & scale	Increases scope & scale of restoration
Detrimental to both environment & socio-economic	Vastly enhances environment & socio-economic outcomes
Implemented projects underperform decision	Post-contracted results equate to NEPA prescription
End-results of NEPA prescription often partial	Improved thorough prep & contracting to goal-oriented
Socio-economic value left unachieved	Increases scope & scale of restoration
Environmental benefits then also unachieved	Vastly enhances environment & socio-economic outcomes
Example: goal 60 sf/ac basal area; result 85sf/ac	Improve project opportunity/feasibility; more acres viable
Project feasibility is compromised	Increases scope & scale of restoration
Harms local trust; impacts forest sector	
Directly reduces restoration scope & scale	
Detrimental to both environment & socio-economic	
Planned projects neglect socio-economic needs	Plans create infeasible or poorly-economical prescription
End-results of NEPA prescription unattainable	Improved tradeoff analyses prior to NEPA decision
Socio-economic value left unachieved	Increases scope & scale of restoration
Environmental benefits then also unachieved	Vastly enhances environment & socio-economic outcomes
Example: light harvest volume is uneconomical	Improve project opportunity/feasibility; more acres viable
Example: operating restrictions uneconomical	Feasible mix of tested/balanced/feasible operating restrictions
Project feasibility is compromised	Increases scope & scale of restoration
Harms local trust; impacts forest sector	
Directly reduces restoration scope & scale	
Detrimental to both environment & socio-economic	
Few NEPA tools for small/simple/urgent projects	Develop new NEPA small/urgent project tools
CE authorities often untapped for use	Develop quick-use, simple project NEPA tools
CE slowed by delayed consultation	Create CE where consultation not needed
No simple emergency CE defined	Salvage; safety; restoration, emergency, repair
Too slow for mortality, wildfire, forest health	Timely value recovery, reforestation, habitat

B. Forest Products Modernization Strategy (FPM)

Deficiency / Barrier	**Recommendation**
Tree measurement sale type	Scaled sale is industry standard
Costly/demanding for USFS prep	Reestablish scaling sites/mills/relationships
Costly/risky for purchaser	
Affords no real added accountability	
Not an accepted industry standard	
Cunit cubic timber volume measure	Board foot (Scribner thousand)
Costly/demanding for USFS prep	BF is industry standard for sawlog
Costly/risky for purchaser	Ton: industry std for pulp; low-value/uniform sawlog
Affords no real added accountability	
Not an accepted industry standard	
Tree designation: account for every tree	Efficiency tools: DxD, DxP
Costly/demanding for USFS prep	Rely more on scaled sale method
Costly/risky/unsafe for purchaser	Purchaser/operator makes better tree selections
Affords no real added accountability	Better multi-resource results
Not an accepted industry standard	More FS use would improve expertise by all
Inferior tree selection decisions by FS	DxP is industry standard
Delays operations; to wait for FS paint	Pre-agree on cutting of unusual/safety/rigging trees
Sawlog defined too small	Increase size of minimum sawlog removed
Smaller than accepted industry standard	Negotiate required removal of negative value logs
Costly/risky for purchaser	Tailor to local & current market in working circle
Devalues FS product and project	Match local industry standard, and by species/grade
Required removal of negative-value piece	Match local industry standard of sawlog/pulplog
Makes more FS projects infeasible	Reform all: piece, scale, accounting, payment
Log paint & brand; load accounting	Load accounting simplify; track by load
Costly/risky for purchaser	Unique load ticket w/description
Unsafe/costly for operator	Paint/brand/tag just 1 log/load
Affords no real added accountability	Load ticket is industry standard
Extraordinary cost for low-value log	Overnight loads, ok by approval
Prohibit overnight loads	Accounting tailored for local working circle
Not accepted industry standards	TSO should be security authority
Makes more FS projects infeasible	
TEA appraisal antiquated, inaccurate	Return to a simplified residual value appraisal
FS does not support TEA properly	Use appraisal to establish minimum rates only
FS lacks market/logging expertise for TEA	Converting to scaled sale resolves bad appraisal
TEA not applied to working circles	Appraise unique to local working circle
Costly/risky for purchaser	Reestablish FS appraisal expertise
Not an accepted industry standard	
Makes more FS projects infeasible/no-bid	

Deficiency / Barrier	**Recommendation**
Contracts with extraordinary restrictions	Reform/scrutinize contract to reduce/inform restrictions
Outdated USFS costly demands	Assign costs to restrictions; reduce cost of restrict
Seasonally restrict costs	Conduct cost vs. value tradeoff test in planning
Equipment restrict costs	Reduce scope & scale of frivolous restriction
Overlapping restrict costs	Tailor to industry standards more often than not
Costly/risky for purchaser	Create contract terms for alternate methods
Often affords worse overall resource results	Practical contract for anchoring, corridors, trails, etc
Not an accepted industry standard	Practical contract for logging safety, hazard tree, etc
Makes more FS projects infeasible	Reduce seasonal bans
Quickly can lead to no-bid sale	Temper soil bans, re-align disturbance to modern stds
Many restrictions are cost-prohibitive	
Other costly restrictions reap little benefit	
IFPL unique to USFS	Adopt Oregon ODF IFPL rules
Outdated USFS rules	Recently modernized in 2017
Costly/risky for purchaser	
Affords no real added fire protection	
Not an accepted industry standard	
Makes more FS projects infeasible	
Not apply KV authority (Congress in 2005)	KV funds can be used outside project boundary, same forest
Inefficient collection & use of KV funds	On-forest efficient collection & use of KV funds
Not apply "I&D authority" (Congress in 2014)	Create program to accelerate/streamline I&D authority
Inefficient application to address this	Each forest with I&D designation has active implementation
OR Governor/FS designated 6.6 million acres	Region codify streamlined authorities to conduct I&D program
Oregon slow to implement any I&D project	Vastly enhances environment & socio-economic outcomes
5 OR projects planned; 0 implemented	Improves forest health and long-term sustainability
Few contract tools for small/simple/urgent projects	Develop new contracted small/urgent project tools
Current contract authorities too cumbersome	Develop quick-use, simple project contract tools
CE slowed by delayed consultation	Create CE/contract where consultation not needed
No simple emergency contract defined	Salvage; safety; restoration, emergency, repair
Too slow for mortality, wildfire, forest health	Timely value recovery, reforestation, habitat

C. Forest Plan Revision

Deficiency / Barrier	Recommendation
11 existing outdated Oregon forest plans	Region initiate systematic program to revise all 11 plans
26-32 years old; NFMA intent is 20-year life	Revise forest plans individually; 2-forest combinations ok
Much antiquated science; conflicting policy	Blue Mtns plan would be only appropriate 3-forest plan
Current plans hinder project NEPA	Complete plans that support project NEPA
With ineffective plans, each project an EIS	With new plan, each project short EA or CE, tiered to plan
No schedule/proposal to initiate plan revision	Schedule Oregon 11 plan revision completed by 2023
Current plans all lack sufficient integration	Regional planners create template for effective revision
Socio-economic & environment not integrated	New procedures must integrate socio-economic & environment
Prior revisions/amendments failed to integrate	New plans to supersede prior amendments/revisions/settlement
NWFP revision outdated and politically-drawn	Plans should create foundation to which projects can tier
Screens/Pacfish/Roadless amendments	Plans best with fewer standards and guides
Current plans ineffective; lack legal sufficiency	Plans to be driven by local partnerships/relationships (page 3)
Dozens of amendments make further conflicts	Plans to offer effective desired conditions and legal sufficiency
Court rulings/settlements often irrational	Keep plans simple to understand and implement
Plans now an impenetrable maze of conflicts	New plans have improved socio-economic; better than prior
Plan conflicts open to legal inadequacy	New plans should have solid legal sufficiency
Recent planning efforts neglect socio-economics	Regional planners create program to re-balance priorities
Recent planning efforts lack local relationships	Plans to include working circle socio-economic assessment (page 2)
Past planning discounted communities of place	New plans to improve partner relations ships (page 3)
Past planning created grassroots fatigue	New plans responsive to communities of place and partners
Past planning created distrust	New plans rebuild trust; rather than diminish it
Planning lacks logging-transportation assess	Plans address integrated logging-transportation assessment
Planning omits valid socio-economic assessment	Plans address integrated socio-economic assessment
Planning void of economic viability tests	Plans use modern economic viability tests; socio-economic efficiency
Plans capped by current costs and budgets	NOT budget-limited; new efficiencies reduce cost to plan/implement

D. Logging/Transportation/Operational Systems Reboot

Antiquated/lacking expertise in operations	Modern knowledge of contemporary forest operations
Logging system lens of the 1980s	Informed on mechanized, cable, hybrid, tether, helicopter
Inexperienced at road/logging systems feasibility	Adept with designing optimized road/logging systems
Sale layout/designation lens of the 1980s	Modern, industry standard in sale layout
Timber contracting/appraise/cruise outdated	Modern, industry standard in contracting/appraisal
Logging compatibility of thin vs. regeneration	Modern, industry standard in logging vs. silviculture
Post-sale fuels/reforest/release inexperience	Modern, industry standard in post-sale treatments
Timber accountability/security in dark ages	Modern, industry standard in timber accounting
Unawares of operational costing	Modern, industry standard in costing
Unawares of operational safety	Modern, industry standard in operational safety
One "logging specialist" shared R6 & R5	Resident expertise on each forest, district or zone
Few staff/decade attend logging systems train	Many trainings repeated to rapidly rebuild expertise

Deficiency / Barrier	**Recommendation**
Interdisciplinary teams are imbalanced	Planning teams re-balanced to assure 6 disciplines:
Currently biased toward ecological	1. Socio-economic: Economic;contract;budget;costs;Nepa
Currently deficient in socio-economic	2. Socio-economic: Logging/transport; layout; operations
Resulting plans/decisions imbalanced	3. Socio-economic: Engineer/facilities; access; trail; road
Resulting decisions uneconomical/ infeasible	4. Socio-economic: Users; recreation; security; publics
Decisions ineffective; fail at desired results	5. Socio-economic: Real estate;neighbor;easement;survey
Decisions achieve less; less supported	6. Socio-economic: As-need: graze;cultural;irrigate;mine
Decisions sap $$ from other work	Project teams to have 50% socio-economic seats
Decisions limit future options	Inclusion of the 6 above skill-sets to balance decisions
Current ID teams 80%+ environmental skills	Improved ID team skills are 50% environmental and 50% economic
Organizational staff lack operational skills	Increase staff expertise in logging/transport; layout; operations
Too few socio-economic staff/skills	Increase staff expertise in engineer/facilities; access; roads
Too few operational-experience staff/skills	Re-structure staff to include 6 socio-economic disciplines
Missing skill sets on most every forest	Train staff to include needed balance of expertise/skill-set
Too many environmental staff/skills	Train decision makers in balance of topics
Decision makers uninformed in socio-economic	Decision maker training in socio-economic/operational skills
Tradeoff analysis lacks operational tools	Reform project planning procedures to assure project viability
Prescription/restriction costly w/o benefit	Assure operational economics in NEPA planning
Planners uninformed of operating reality	Conduct cost vs. value tradeoff test in planning
Planners uninformed of economic reality	Conduct benefit/cost analysis of Rx and project
Planners uninformed of balance of harms	Restructure staff balance of expertise
Planners uninformed of access feasibility	Train staff in need compliment of topics
Planners/managers fail to integrate Rx	Train decision makers in balance of topics
Forest road access valued as a liability	Forest access valued as essential asset management tool
Roads devalued as an environmental harm	Roads useful & necessary for administration & socio-economic
Goals to decommission/eliminate roads	Many valued options to manage roads in a closed/hold status
Fail to search for means to maintain roads	Conduct roads cost vs. value tradeoff tests in planning
Managed roads not in vocabulary	Sustainable forests demand future access; firefight access
Eliminate roads rather than manage roads	Expand types of road management/classification
Goal to reduce miles of system roads	Roads are an asset, subject to many types of classification
Excess spending on road rebuild & eliminate	Restore/reconstruct low standard roads & managed access

E. Eastern Oregon Socio-Economic Sustainability

Eastern Oregon Forest Sector Distressed; Urgent Need to Increase Timber Sale Volume, Value, and Reliability.

The impact of all the aforementioned obstacles is even more dire in Eastern Oregon, where the forest sector capacity has diminished in scope, scale, and geographic availability. Distant markets and increasingly-fewer forest management opportunities are becoming inconsistent and unreliable, largely due to the waning commitment to forestry of the public forest ownership, and its 75%+ dominance of the forestland area across the Eastside. Lacking significant future forest policy changes, the continued harmful erosion of the forest sector is predictable in Eastern Oregon.

Amid much rhetoric of promised increase in national forest management outputs, the real economic value and volume actual harvest of US Forest Service timber sale volume across Eastern Oregon—and within some working circles—has remained flat or actually experiencing value decline (largely due to the escalating percentage of USFS timber offer of pulpwood, lower value sawlog, and negative valued-sawlog; and additionally the increasingly uncertain future availability of planned and projected USFS timber volume). This cannot be a sustainable long-term socio-economic situation, as forest sector infrastructure investment has for years been lagging there, mills in-general operate well below their competitive capacity, and neither manufactures nor contractors can afford to sufficiently invest in the necessary technology, labor and organization to remain sustainable and competitive over the long-haul.

Manufactures and forest contractors, in general on the Eastside, have been unable to maintain sufficient investment in their infrastructure and labor to remain fully competitive in the Northwest and North American forest products sector. There remain just nine primary forest product mills on the Eastside. At first glance this may appear sufficient to manage the forestlands. However, the distance between mills, specialization of each mill, and each mill's stifled capacity/investment renders the current milling capacity and forestland management tenuous at best… and likely unsustainable. The same calculus of marginal sustainability is applicable to the forest contract sector.

There are Eastside geographic areas (working circles; see page 2) where the smaller so-called non-industrial private forestland owners simply have no viable market to conduct forest management—due to either a mill, operating a curtailed capacity refusing their timber sale, or uneconomical distances, or unavailable contract capacity, or uneconomical cost-value situations fostered by chronic industry disinvestment in the working circle impacting cost metrics. Non-industrial private forest and ranchlands experience increasing pressure to change land use to non-forest land uses on the Eastside, because currently growing and harvesting trees is becoming an uneconomical venture for owning and paying taxes on their forestland. This threat of forestlands exiting forest status should concern all Oregonians and the US Forest Service decision-makers alike.

Eastside Deficiency / Barrier	**Eastside Recommendation**
Uncertain USFS timber volume available	Restoration of USFS timber volume certainty
Forest plan promised volume never attained	Revise forest plans to be reliable & legally sufficient
Forests often under-achieve annual sale targets	Forests achieve annual sale targets
Leakage of volume pre-harvest; FS cancel units/sales	USFS prepared NEPA-defensible project decisions
Forest plans outdated and conflicting	Revise forest plans to markedly increase sawlog sale
Declining USFS timber value	Improving USFS timber value
Rising non-merch volume %	Reduce non-merch volume %
High % of negative-value so-called "FS sawlog"	Redefine/increase FS sawlog definition match industry standard
No tree cut over 19-20"dbh(precautionary)	Revise/rescind 21" limit; raise to 30"dbh
No large trees included	harvest some large trees up to 30" dbh
Paint every tree	DxD, DxP
Conservative, light harvest	Harvest more trees/acre of area treated
Underperform NEPA Rx	Fully-implement RX harvest density & tree size
Poor layout; inaccessible units	Improve logging/transportation plan & layout
Long skidding distances	Authorize needed practical/feasible road access
Rising operating costs of USFS timber sales	Declining operating costs of USFS timber sales
Extraordinary operating costs of USFS sales	Reduce operating conflicts/restrictions
Refer to list "Declining USFS timber value"	Refer to list "Improving USFS timber value"
Few contract tools for small/simple/urgent projects	Develop new contracted small/urgent project tools
Current contract authorities too cumbersome	Develop quick-use, simple project contract tools
CE slowed by delayed consultation	Create CE/contract where consultation not needed
No simple emergency contract defined	Salvage; safety; restoration, emergency, repair
Too slow for mortality, wildfire, forest health	Timely value recovery, reforestation, habitat

Eastern Oregon Lacks Cable Logging System Capacity; Urgent Need to Restore Sufficient, Cost-Effective, and Reliable Cable Timber Sale Volume.

Problem A: There are no cable logging contractors doing business in Eastern Oregon working circles, that are available to harvest Forest Service cable harvest units. Federally available cable capacity is gone in Eastern Oregon, after 20 years of negligible national forest timber sale of cable sawlog volume in eastside working circles (northeast, central, south-central). Cable contractors may from time to time consider travelling from outside Eastern Oregon, if their extraordinary mobilization and per diem cost premium are paid to work remotely. Or, within an eastside working circle, an existing mechanized contractor may from time to time consider re-tooling to cable log locally, if their extraordinary mobilization and establishment amortization costs are paid to work for a short-duration project. At present all USFS cable logging projects in Eastern Oregon are short-duration temporary projects—which would not warrant establishment amortization cost/premium of new cable capacity.

Problem B: At present, any logging business would consider a USFS cable logging projects in Eastern Oregon as very high-cost, with great risk, and uncertainty. The USFS has an earned reputation as having costly, overly-restricted projects, little profit opportunity, poor layout, punitive contracts,

excessive removal & accountability specs, and inexperienced contract administration. Furthermore, USFS cable projects are experienced to be short-duration temporary projects—which would not warrant establishment amortization cost premium of new cable capacity.

Problem C: At present, any logging business would consider a USFS cable logging projects in Eastern Oregon as encumbered by both excessive seasonal and impractical industrial fire restrictions. Again, these restrictions create a very high-cost project, with great risk, and uncertainty. The USFS has an earned reputation as having excessive seasonal and impractical industrial fire restrictions—which quickly render a project unprofitable to the contractor. A USFS cable project would be perceived (most correctly) as high-cost, little profit opportunity, poor layout, inexperienced contract administration, and subject to unworkable and costly seasonal and impractical industrial fire restrictions. Just one graphic example: in 2017, the Deschutes-Ochoco NF mandated a full industrial shutdown for summer fire precaution exceeding 40 days, not including a dozen or more additional day that it mandated cable logging would have been shutdown (if it had any). This alarming shutdown was both egregious and punitive to the working circle's forest sector businesses; the same forest sector businesses which the USFS hopes to attract to partner and invest in national forest management.

Problems Are Surmountable: Problems A, B and C illustrate the high bar necessary to overcome in the agency's endeavor to restore cable logging system capacity in Eastern Oregon. However, this objective is both achievable and certainly warranted—because Eastern Oregon national forests have abundant cable-suitable forestland that's in dire need of restoration, harvesting, and forest improvement. Furthermore, there are abundant national forest cable slopes where cable logging could be cost-effective and profitable—provisionally, if the USFS would for cable harvest units reform its project planning standards, policies, procedures, and timber sale programs.

We would welcome the opportunity for the private sector to increase cable logging contract capacity in Eastern Oregon: We encourage the Forest Service to improve national forest timber sale of eastside cable sawlog volume. Without a targeted agency initiative to accomplish this objective for a longer duration, I am doubtful that consistent cable logging capacity would be restored in Eastern Oregon. To foster the private sector increase of cable logging contract capacity in eastern Oregon, I am available to advise and counsel, as needed.

Strategy -- Cable Logging System Capacity Reestablished in Eastern Oregon:
We encourage the USFS to pursue cable unit plans, designs, and offering sawlog timber volume – which would advance the national forest's desired future condition and improve the economic and social contributions from the federal forest. A unified cable restoration initiative—possibly coordinated by the regional office— would be necessary; we suggest the following components of such an initiative:

1. One forest alone cannot reboot USFS cable logging capability or contractor capacity; it will take a concerted agency effort by all 6 eastside OR national forests. Regional office assistance would be helpful.

2. The 6 eastside forests would need to develop a concerted and reliable package of cable sawlog volume annually with each working circle (see page 2). This volume per forest should be determined in cooperation with eastside working circle purchasers and associations.

3. The 6 eastside forests would need to develop agreed metrics for minimum thresholds of cable sawlog volume per acre, per cable road, per unit, and per sale. These threshold volumes should be determined in cooperation with eastside working circle purchasers and associations.

4. The 6 eastside forests would need to develop agreed guidelines for cable timber sales in terms of operating season/access; residual leave-tree/buffers; road surfacing durability/season of use. Five-month/summer logging alone cannot sustain re-established cable capacity. These guidelines should be determined in cooperation with eastside working circle purchasers and associations.

5. Cable sawlog volume (minimum sawlog spec) should be measured as industry-standard sawlog—*not* including pulplogs; *not* including negative-value USFS regional office dictates of 10 bf piece. Sawlog volume definition should be tailored for each specific working circle, by species and grade. These minimum sawlog specifications should be determined in cooperation with eastside working circle purchasers and associations.

6. Eastside cable units would need to be designed to be readily economically feasible, and very cost effective. These factors have much to do about: cut sawlog value/volume per cable road; properly located roads/landings; cost-effective span/external yarding distance/deflection; uninterrupted operating season/access; residual leave-tree or stream buffer complications; safety hazards; road surfacing durability/season of use; mechanized falling available on cable slopes; and other considerations.

7. Modern knowledge of contemporary cable and mechanized logging/transportation systems would be required on each forest – resident staff. Staff needs to be skilled in mechanized, cable, hybrid, tether, helicopter, yarding; experienced at road/logging systems feasibility; adept with designing optimized road/logging systems; experienced with modern, industry standards in sale layout/ contracting/ appraise/ silviculture.

8. Interdisciplinary teams must change their past uneconomical behavior; and team skill-sets must be reformed (see prior discussion) to be 50% socio-economic staff skill-sets. Knowledgeable team member must have logging systems expertise.

9. There must be more sincere and effective tradeoffs made during NEPA planning to install adequate, and properly located, roads and landings for fair inclusion of necessary and feasible cable logging and forest management access [environment vs. socio-economic]. This has not been the case the past couple decades on the eastside.

10. To achieve economically feasible cable logging re-establishment on eastside, the harvest method must be regeneration or include a significant regen component, which removes significant sawlog value now. Cable viability cannot be dependent on just low-cut volumes/values—or low value removal per acre— from light thinning or thinning from below. This may also require rescinding the 21" diameter cut limit, to authorize a higher 30" cap.

Thank you for the opportunity to comment about the US Forest Service agency improvement efforts, applicable to Oregon's eleven national forests. If our comments create questions, please do not hesitate to contact me: 503-364-1330, or by email: rstorm@oregonloggers.org

Sincerely,
/s/ Rex D. Storm
Rex Storm, CF
Forest Policy Manager,
Associated Oregon Loggers, Inc.

CC:
Linda Lind, Regional Forester's OR Representative llind@fs.fed.us
Lisa Ball, R6 Logging Systems Specialist lmball@fs.fed.us
John P. Allen, Deschutes NF jpallen@fs.fed.us
Barry Imler, Fremont-Winema NF bimler@fs.fed.us
Steve Beverlin, Malheur NF sbeverlin@fs.fed.us
Shane Jeffries, Ochoco NF sjeffries@fs.fed.us
Slater Turner/Eric Watrud, Umatilla NF sturner@fs.fed.us ewatrud@fs.fed.us
Tom Montoya, Wallowa-Whitman NF tmontoya@fs.fed.us

Lisa Northrop, Mt. Hood NF lnorthrop@fs.fed.us
Scott A. Russell, Rogue-Siskiyou NF sarussell@fs.fed.us
Jerry Ingersoll, Siuslaw NF jingersoll@fs.fed.us
Alice Carlton, Umpqua NF acarlton@fs.fed.us
Tracy Beck, Willamette NF tbeck@fs.fed.us