May 27, 2025

Gabe Wishart
Middle Fork District Ranger
Willamette National Forest
46375 Highway 58
Westfir, OR 97492

In Reply To: Steeple Rock Rigdon Draft Environmental Assessment

Dear Mr. Wishart:

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 Middle Fork Ranger District proposing vegetation management on lands designated as Matrix, Late Successional Reserve, and Riparian Reserve Land Use Allocations 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. We are also glad to see that the RD has recognized the importance of the sustainable supply of timber off Forest Service land by including the provision of that supply in the Purpose & Need for the Steeple Rock

project. AFRC believes that the provision of useful raw material off National Forest Service land is an integral component of the agency's multiple-use mission. In recent years, many Forest Service Districts have opted to omit the provision of useful raw material from the purpose & need statements of vegetation management projects. AFRC has warned against this practice as it marginalizes the appropriateness of this provision to the agency's mission. Most all Forest Service vegetation management projects achieve an array of positive outcomes. One of these positive outcomes is a sustainable supply of wood products, and we thank the RD for recognizing this in the Steeple Rock project.

RIPARIAN RESERVES

We are pleased to see the RD incorporate commercial thinning in some Riparian Reserves within the Steeple Rock project. Often, stands proposed for thinning treatment in the uplands have the same undesired forest conditions (overly dense and uniform stands) in riparian areas. The forest health benefits that you expect to attain through upland thinning treatments can also be achieved in riparian areas with similar active management prescriptions. Allowing some commercial harvest will not only produce usable forest products, but it will also promote greater resiliency in the Riparian Reserves.

ROAD DECOMMISSIONING

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 Steeple Rock 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.

QUARRY DEVELOPMENT

We are pleased to see the RD incorporate rock source development for existing quarries within the Steeple Rock Planning Area. Maintaining a nearby rock source will help the economic viability of future timber sales resulting from the project. Similarly, we are also pleased to see the RD list mitigations necessary to reduce or eliminate weed spread as a result of hauling and applying rock. AFRC membership is aligned with the Forest Service's goal of minimizing the spread of noxious weeds resulting from harvest activities on federal land. It is in the best interest of the agency and contractors to make sure that forestry operations do not contribute to this growing issue on federal lands.

WET SEASON OPERATIONS

We appreciate your guidance in PDF AQU 33 which specifies that ground-based equipment should be suspended during "wet conditions", rather than imposing strict seasonal dates. Similarly, we appreciate PDF AQU 23, which allows wet season haul where specific conditions are met. Constructing forest roads is essential if active management is desired, and we are glad that the RD is proposing the roads that are needed to access and treat as much of the project area as possible in an economically feasible way. Proper road design and layout should pose little to no negative impacts on water quality or slope stability. 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.

HELICOPTER YARDING

In our scoping comments, we urged the RD to take a hard look at their proposal to require helicopter yarding on approximately 26% of the harvest area, and to consider using temporary roads to facilitate conventional yarding systems. Unfortunately, the RD did not analyze this action, and the 624 acres of helicopter yarding remain unchanged. It is difficult for us to assess whether the proposed helicopter yarding is appropriate for the site without knowing exactly which units will require the yarding method as no map of proposed harvest methods is included in the Draft EA. Again, **we urge the RD to examine those proposed helicopter-only units in more detail and to perform an economic analysis comparing the cost of helicopter yarding with the cost of building temporary roads to facilitate conventional yarding methods. Furthermore, we urge the RD to include in their final analysis a detailed description of harvest methods for each unit proposed for harvest in the Steeple Rock EA.**

For those sales in which helicopter yarding is required, it will be critical for purchasers to be able to operate in the winter months. Securing helicopters in the summer months is extremely difficult for our membership, primarily due to competing needs for fire suppression. **Ensuring that roads that access helicopter units are rocked to permit wet season hauling is critical to the successful implementation of those units.**

TETHERED ASSIST (TA) YARDING

We noticed that the EA did not analyze the potential use of tethered-assist equipment to log on steep terrain with harvesters and forwarders. The technology associated with this equipment has evolved significantly over the past several years. The availability of that equipment has expanded significantly over the past several years. New machines are being built lighter with less impact on the ground that they operate on. A track-mounted loader, for example, would be tethered

at the landing. This displaces the weight to the source of the tethering and reduces the psi generate by the tracked equipment. Other Forests in the Region have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. **We urge the RD to consider allowing this equipment to be used where appropriate on the Steeple Rock Project to mitigate potential implementation obstacles.** We believe modifications can be made to the EA to permit tethered-assist equipment, including harvesters and forwarders, without modifying the effects on the ground.

UNDERSOTRY FUEL TREATMENTS

We are disappointed that the entire 410 acres of proposed understory fuel treatments in the Steeple Rock EA will be restricted to non-commercial thinning only. It appears that the vast majority of the project's proposed fuel breaks intersect with plantations which exhibit the same undesired growing conditions as areas identified for commercial harvest. This decision is concerning to us for a number of reasons.

First, it is not clear to us what rationale the RD used to determine what intensity of management was necessary along these fuel breaks to create a resilient and fire-resistant stand condition. There is no discussion on desired relative density, crown continuity, inter-tree competition, or any other metric which would illustrate the effectiveness of proposed treatments. Instead, there is only a sweeping diameter cap of 7 inches for every fuel break with no stated reasoning. It's true that understory thinning will reduce the horizontal fuel profile within these fuel breaks. For fires originating from the road, this may help to minimize the likelihood of a fire quickly spreading into the crowns of adjacent overstory trees. But fuel breaks are not only meant to be effective at reducing the likelihood of conflagration at the point of ignition. Their effectiveness should also be measured in their ability to give firefighters an opportunity to control or suppress the volatility of an approaching crown fire.

Second, we worry that if a severe fire were to occur in this project area, and quickly overcame one of these fuel breaks, then that may undermine the perceived effectiveness of fuels reduction and tree thinning as a means of preventative forest maintenance. The public may view fuel breaks as ineffective when, in fact, the control lines were never adequately treated to begin with.

Finally, we are concerned with any project proposal which increases logging costs while also delivering less timber volume to local purchasers. As your Draft EA identifies, the majority of proposed fuel breaks will intersect with previously managed plantations. There should be little, if any, concern for proposing treatments in stands that exhibit similar stocking and structure as stands proposed for commercial treatment elsewhere in the Steeple Rock project area.

Again, we agree that some form of fuels treatment is necessary along these proposed fuel breaks to prepare the landscape for the inevitable future wildfire. We also understand that many of these fuel breaks will intersect with stands that require only pre-commercial treatment in order to meet desired stand conditions. We only contend that, when determining management intensity along these fuel breaks, there should be more consideration than a single, arbitrary, one-size-fits-all diameter limit. **We urge the RD to reconsider this approach and allow commercial removal within proposed fuel breaks, wherever appropriate.**

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 RD 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 Steeple Rock Rigdon project. Should you have any questions regarding the above comments, please contact me any time at 541-521-9143 or cbingaman@amforest.org.

Sincerely,

Corey Bingaman
Western Oregon Field Coordinator
American Forest Resource Council