



December 26, 2025

Darren Cross  
District Ranger  
McKenzie River Ranger District  
Willamette National Forest  
57600 McKenzie Highway  
McKenzie Bridge, OR 97413

**In Reply To:** Tie GNA Project Scoping Letter

Dear Mr. Cross:

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 McKenzie Ranger District (MRD) list *providing a sustainable supply of timber* as a **need** of this project. 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. Considering the fact that the bulk of proposed units in this scoping notice encompass the Matrix Land Use Allocation (LUA), the only allocation described in the Northwest Forest Plan where sustainable timber production is permitted, it is especially important for the MRD to recognize the importance of these lands to local purchasers.

**Good Neighbor Authority**

We are also pleased to see the District leverage the State's experience and resources via the Good Neighbor Authority (GNA) to provide planning capacity to the District's timber sale

program. To-date, GNA projects for the Willamette have largely consisted of the Forest handing administrative duties off to the State for individual timber sales. Our members universally agree that this has been a positive development for local federal timber sale programs. That said, it has been difficult to assess how much of the program has proven to be *additive* to the sale program, which is an explicit goal of the GNA partnership. We have maintained that for the GNA program to be truly *additive* to the federal timber sale program, then the ODF should be more involved in the planning phase of project development. This project represents a welcome development towards that effort. We hope the Forest's partnership with the ODF will continue to grow from this experience.

## AGENCY DEFERENCE

On May 29, 2025, a decision was issued from the U.S. Supreme Court in the *Seven County Infrastructure Coalition et al. v. Eagle County, Colorado et al.*, a case involving the interpretation of the National Environmental Policy Act (NEPA). In an 8-0 decision, with Justice Gorsuch recusing himself, the Court ruled to limit the environmental effects agencies must consider when assessing a proposed project. This decision provides a major course correction on the court's role in reviewing NEPA cases and highlights the delay tactics from project opponents and impermissible judicial overreach when reviewing NEPA claims.

We ask that the MRD consider several components of this landmark decision as you conduct the NEPA analysis for the Tie Project. The following excerpts were pulled verbatim from the decision and should inform the scope and extent of the ensuing analysis.

*The role of a court in reviewing the sufficiency of an agency's consideration of environmental factors is a limited one. The bedrock principle of judicial review in NEPA cases can be stated in a word: Deference.*

*The agency is better equipped to assess what facts are relevant to the agency's own decision than a court is. As a result, agencies determine whether and to what extent to prepare an EIS based on the usefulness of any new potential information to the decision-making process.*

*So long as the EIS addresses environmental effects from the project at issue, courts should defer to agencies' decisions about where to draw the line—including (i) how far to go in considering indirect environmental effects from the project at hand and (ii) whether to analyze environmental effects from other projects separate in time or place from the project at hand. On those kinds of questions, as this Court has often said, agencies possess discretion and must have broad latitude to draw a 'manageable line.'*

We urge the MRD to review the Supreme Court decision in its entirety. However, the excerpts highlighted above capture the essence of that decision as it applies to project analysis:

1. Courts should apply deference to agency expertise in project NEPA analysis, particularly regarding the scope of the analysis.
2. This deference specifically applies to the extent of analysis on:
  - a. Indirect effects of the proposed action

- b. Cumulative effects from separate projects and actions

## **EXECUTIVE ORDER ON THE IMMEDIATE EXPANSION OF AMERICAN TIMBER PRODUCTION**

On March 1, 2025, President Trump signed into law an executive order titled “Immediate Expansion of U.S. Timber Production” which explicitly directs the US Forest Service and Bureau of Land Management to take *decisive actions* to increase timber supplies and reduce regulatory barriers. The intent of this EO is abundantly clear: domestic lumber production is critical to supply our local demand for wood products – and federal timberlands hold the greatest potential for unlocking local capacity in wood products manufacturing. In other words, the Forest Service must look for opportunities to increase their capacity to offer timber volume to local manufacturers, while following the guidelines of their land management plans.

## **RIPARIAN RESERVES**

We urge the MRD to include *managing Riparian Reserve to control stocking* as a “need” of this project. 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. We urge the MRD to strive toward maximizing the acres of riparian reserve treated to meet those objectives. It has been well documented that thinning in dense, uniform forest stands accelerates the stand’s trajectory to produce large conifer trees, vertical diversity, and tree-species diversity (Garman, Steven L.; Cissel, John H.; Mayo, James H. 2003.).

The tradeoffs that the MRD will likely be considering through the ensuing environmental analysis will be between achieving these forest health benefits and potentially having adverse impacts to streams. These impacts to streams typically include stream temperature, wood recruitment, and sedimentation associated with active management. We would like the MRD to review the literature cited below and incorporate its findings into your environmental analysis that will shape the level of management permitted to occur in riparian reserves.

### *Stream temperature*

Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management*, 270, 302-313.

Key points of the Janisch paper include:

- The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature.
- Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.

Anderson P.D., Larson D.J., Chan, S.S. 2007 Riparian Buffer and Density Management Influences on Microclimate of Young Headwater Forests of Western Oregon. *Forest Science*, 53(2):254-269.

Key points of the Anderson paper include:

- With no-harvest buffers of 15 meters (49 feet), maximum air temperature above stream centers was less than one-degree Celsius greater than for unthinned stands.

### *Riparian reserve gaps*

Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old-growth versus early-mature riparian forests in western Oregon. *Aquatic Sciences* 75:547-558.

Key points of the Warren paper include:

- Canopy gaps were particularly important in creating variable light within and between reaches.
- Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests.

### *Wood Recruitment*

Burton, Julia I., Olson, Deanna H., and Puettmann, Klaus J. 2016. Effects of riparian buffer width on wood loading in headwater streams after repeated forest thinning. *Forest Ecology and Management*. 372 (2016) 247-257.

Key points of the Burton paper include:

- Wood volume in early stages of decay was higher in stream reaches with a narrow 6-meter buffer than in stream reaches with larger 15- and 70-meter buffers and in unthinned reference units.
- 82% of sourced wood in early stages of decay originated from within 15 meters of streams.

Benda, L.D. Litschert, S.E., Reeves, G. and R. Pabst. 2015. Thinning and in-stream wood recruitment in riparian second growth forests in coastal Oregon and the use of buffers and tree tipping as mitigation. *Journal of Forestry Research*.

Key points of the Benda paper include:

- 10-meter no-cut buffers maintained 93% of the in-stream wood in comparison to no treatment.

### *Sedimentation*

Rashin, E., C. Clishe, A. Loch and J. Bell. 2006. Effectiveness of timber harvest practices for controlling sediment related water quality impacts. *Journal of the American Water Resources Association*. Paper No. 01162

Key points of the Rashin paper include:

- Vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment.

Collectively, we believe that this literature suggests that there exists a declining rate of returns for “protective” measures such as no-cut buffers beyond 30-40 feet. Resource values such as thermal regulation and coarse wood recruitment begin to diminish in scale as no-cut buffers become much larger. We believe that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood

recruitment, based on this scientific literature. We urge the MRD to establish no-cut buffers along streams no larger than 40 feet and maximize forest health outcomes beyond this buffer.

Having spent a considerable amount of time visiting Forest Service timber sale projects, we are aware that the stream layers incorporated into much of the Forest's planning documents often do not reflect the actual location of real streams in the woods. **We ask that the MRD take a close look in the field to determine whether mapped streams are accurate.**

## **NARROW PROJECT AREA DETERMINATION**

We are confused by the MRD's narrow scope with regards to identifying units for treatment in the Tie scoping notice. Specifically, we disagree with the MRD's decision to limit treatment to only those stands within the project area where previous management has taken place. Many unmanaged areas within the Tie project area contain the same undesirable stand conditions (dense stocking, structural homogeneity) as those previously-managed stands proposed for treatment in this scoping notice. While the condition of these stands is not the result of industrial logging and subsequent high-density planting, the exclusion of fire in these "natural" stands has nonetheless resulted in stand conditions which are highly departed from their natural range of variation.

It is not lost on AFRC the complex issue of proposing treatment in "natural" stands or stands older than 80 years as a result of the onerous "survey and manage" requirements described in the Northwest Forest Plan (NWFP) for Red Tree Voles (RTV) and other species. For much of the land base covered by the Tie project area, however, we believe that there should be little concern for the survey and manage requirements for RTV for two reasons.

First, many of the stands targeted for treatment in your scoping notice exist at elevations above 3,500 feet, where surveys are not required for RTV (Forest Service and BLM, 2012). Of course, this may not exempt other species of concern from survey and manage requirements. For the RTV, however, there should be little concern for the MRD to propose treatment which accomplishes the stated purpose and needs across the entire project area, regardless of stand age or management history.

USDA Forest Service and USDI Bureau of Land Management. 2012. Survey protocol for the red tree vole, *Arborimus longicaudus*, Version 3.0. Region 6, Portland, Oregon. 51 p.

Second, the project area identified in your scoping notice is comprised almost entirely by Matrix LUA, the only non-reserved LUA described in the NWFP in which most timber harvest activities are expected to occur. Of course, this stated intent for Matrix LUA has never truly been realized in the NWFP area as the Agency cannot apply principles of sustained yield forestry amid the complex layers of overlapping restrictions (critical habitat, inventoried roadless areas, survey and manage, etc.) which essentially prohibit management intensity beyond thinning in previously managed stands. This thinning-only paradigm has come at enormous cost to those communities who rely on the wood processing industry for gainful employment as well as those counties in which timber receipts have slowly eroded, depriving the same communities of essential services like safe roads, law enforcement, libraries, etc.

The MRD should strive to identify any area within the Tie project area where the desired outcome for those identified Tie units are similarly not being attained. This should include any

stand where treatment may improve stand growth, diversity, or structure; or where treatment would improve stand resilience and reduce vulnerability to wildfire. Furthermore, for the MRD to meet the requirement to increase timber production from the aforementioned executive order, it is imperative to maximize the level of harvest in the small fraction of the Forest's land where sustained timber production is permitted.

## **SUSTAINABLE FOREST MANAGEMENT**

With the above discussion in mind, we urge the District to propose treatments in the Tie project that are more varied than simply variable retention thinning. AFRC has expressed concern in past scoping documents that a strict thinning paradigm is not sustainable and creates a landscape where the Willamette will eventually run out of stands to thin. Ecologically, there is also an argument that can be made that, in the absence of regeneration harvest since the adoption of the Northwest Forest Plan, there is a dearth of landscape-level early seral habitat across the Forest. The only way to mitigate these concerns and manage sustainably is to alter treatments in a way that creates openings for early seral habitat and remove a portion of larger trees while permitting smaller trees to grow. In addition to improving stand conditions, implementing a broader range of silvicultural prescriptions will also help you meet your purpose and need to "support local economies."

Based on the scoping notice, it appears that the MRD is proposing treatment, excluding "skips", on roughly 21.4% of the portion of the project area managed by the Forest Service (approximately 7,898 acres). This percentage is typical of many Forest Service vegetation management projects and although AFRC would like to see the agency treat a higher proportion of the landscape, we understand the multiple directives and land management restrictions in place that make doing so difficult. Given the relatively small scale at which this project is proposed to be implemented on, we urge the MRD to look for ways to maximize treatment where it is proposed and to avoid deferring units or setting aside portions of units for what is often referred to as "skips" (please consider the fact that 23,084 acres of the Forest's ownership within the project area will essentially be "skipped"). To this end, **we would like the MRD to 1.) consider Variable Retention Harvest (VRH) or Regeneration harvest for some of the older stands identified in this scoping notice; 2.) reduce the level of skips; 3.) increase the level of openings (gaps and DTRs); or 4.) strategically locate skips where harvest operations may be uneconomical or unfeasible.** Skips within the watershed are plentiful; what is not plentiful are openings. If the District truly wants to diversify the proposed stands, then it should focus on creating openings in the forest and minimizing untreated areas within the 7,898 acres of proposed treatment.

## **NSO CRITICAL HABITAT**

We understand that portions of the project area are overlaid by the critical habitat layer (CHU) for the northern spotted owl. This CHU designation does not preclude vegetation management treatments that have adverse impacts to NSOs and/or their habitat, and in fact encourages land managers to consider implementation of forest management practices recommended by the Revised Recovery Plan (USDI FWS 2011) to restore ecological processes where they have been disrupted or suppressed. Application of ecological forestry management practices (including regeneration harvest) within critical habitat can reduce the potential for

adverse impacts associated with commercial timber harvest when such harvest is planned within or adjacent to critical habitat.

In addition to the effects to NSO habitat, this project may also have short-term effects to the NSO (based on the presence of actual owls) due to the assumption that any type of forest management activity, including those that maintain habitat types, will have a negative impact on owls and their prey. This assumption is typically based on a few scientific pieces of literature published over the past decade. We would like the MRD to consider a study conducted by NCASI when assessing treatment areas and their potential affects to owls:

Larry L. Irwin, Dennis F. Rock, Suzanne C. Rock, Craig Loehle, Paul Van Deusen. 2015. Forest ecosystem restoration: Initial response of spotted owls to partial harvesting.

Among other findings, this study concluded that partial-harvest forestry, primarily commercial thinning, has the potential to improve foraging habitats for spotted owls.

## SHADED FUEL BREAKS

We are pleased to see the MRD include the establishment of shaded fuel breaks as a purpose and need for the Tie project. Apart from relying on the Forest to provide usable forest products, many of our members are also adjacent landowners to the Willamette National Forest and are similarly concerned with the Forest's ability to maintain contingency lines along their own roadways during wildfires. This concern compounds when private roads are used to carry out firing operations to attack fires burning on National Forest lands. Public roadways that are properly maintained as fuel breaks are essential for the Forest to protect their land based, the land base of their neighbors, and the populated communities adjacent to Forest Service lands.

Often the Forest will impose unnecessary upper diameter limits when performing fuel reduction work which limits treatment to understory ladder fuel only. This practice ignores the tendency of fires to spread horizontally where crown connectivity is high. If these roadways are going to be truly "strategic", the Forest should prioritize prescriptions that treat both vertical and horizontal fuels, regardless of tree size. To this end, **we recommend that the MRD utilize the 2020 NRCS Conservation Practice Specification for Fuel Breaks in Forestland which specifies for roadside hazard treatments:**

Apply roadside fuel breaks [*sic*] along county roads or private roads at an effective minimum width of 2 ½ times the height of the average codominant tree or brush species vegetation or a **minimum of 200 feet**. Add 10 feet to the width for every 10 percent increase in slope (e.g., for a 50% slope 200 ft + 50 ft = 250 feet total width), on level ground. Ideally, roadside fuel break widths are installed evenly on each side of the road." (Pg. 5)

Reduce or modify the existing fuel load (live vegetation and debris) to diminish the risk and/or rate of the spread of fire crossing the strip or block of land. **Vegetation treatments shall focus on treating/removing fuels in all vegetative layers including tree crowns, understory trees and brush**, and dead and down surface fuels or live ground cover. **Focus on substantial vegetative removal** and debris clean-up. (Pg. 5)

## CARBON SEQUESTRATION

If the Forest Service identifies carbon sequestration and impacts to climate change as a key issue on this project, we would like you to consider some of the literature cited and outlined below:

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. *Ecosphere* 7(1):e01224.10.1002/ecs2.1224

Key points of the Gray paper include:

- Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

For those stands proposed for treatment, please consider that in the absence of commercial thinning, the forest where this proposed action would take place would thin naturally from mortality-inducing natural disturbances and other processes resulting in dead trees that would decay over time, emitting carbon to the atmosphere. Conversely, the wood and fiber removed from the forest in this proposed action would be transferred to the wood products sector for a variety of uses, each of which has different effects on carbon (Skog et al. 2014). Carbon can be stored in wood products for a variable length of time, depending on the commodity produced. It can also be burned to produce heat or electrical energy or converted to liquid transportation fuels and chemicals that would otherwise come from fossil fuels. In addition, a substitution effect occurs when wood products are used in place of other products that emit more GHGs in manufacturing, such as concrete and steel (Gustavsson et al. 2006, Lippke et al. 2011, and McKinley et al. 2011). In fact, removing carbon from forests for human use can result in a lower net contribution of GHGs to the atmosphere than if the forest were not managed (McKinley et al. 2011, Bergman et al. 2014, and Skog et al. 2014). The IPCC recognizes wood and fiber as a renewable resource that can provide lasting climate-related mitigation benefits that can increase over time with active management (IPCC 2000). Furthermore, by reducing stand density, the proposed action may also reduce the risk of more severe disturbances, such as insect and disease outbreak and severe wildfires, which may result in lower forest carbon stocks and greater GHG emissions.

Gustavsson, L., Madlener, R., Hoen, H.-F., Jungmeier, G., Karjalainen, T., Klöhn, S., ... Spelter, H. (2006). The Role of Wood Material for Greenhouse Gas Mitigation. *Mitigation and Adaptation Strategies for Global Change*, 11(5–6), 1097–1127.

Lippke, B., Oneil, E., Harrison, R., Skog, K., Gustavsson, L., Sathre, R. 2011 Life cycle impacts of forest management and wood utilization on carbon mitigation: knowns and unknowns, *Carbon Management*, 2:3, 303-333.

McKinley, D.C., Ryan, M.G., Birdsey, R.A., Giardina, C.P., Harmon, M.E., Heath, L.S., Houghton, R.A., Jackson, R.B., Morrison, J.F., Murray, B.C., Pataki, D.E., Skog, K.E. 2011. A synthesis of current knowledge on forests and carbon storage in the United States. *Ecological Applications*. 21(6): 1902-1924.

Skog, K.E., McKinley, D.C., Birdsey, R.A., Hines, S.J., Woodall, C.W., Reinhardt, E.D., Vose, J.M. 2014. Chapter 7: Managing Carbon. In: *Climate Change and United States Forests, Advances in Global Change Research* 57 2014; pp. 151-182.

## ECONOMICS AND OPERATIONS

The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

**We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results;** in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the MRD market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. **To address this issue we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas.** We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest.

## **TETHERED ASSIST (TA) LOGGING**

With this in mind, we urge the MRD to include within the Tie EA a discussion on the use of Tethered-assist (TA) logging for sales which result from this analysis. The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. TA logging is becoming a more economical, safe, and available method of yarding on steep slopes throughout the region. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. Several Forests in Region 6 have approved thinning stands on slopes up to 70% using TA. **We urge the MRD to consider allowing this equipment to be used where appropriate in the Tie Project EA to mitigate implementation obstacles.** Also, we urge the MRD to consider the following research when determining suitability of TA for timber sales resulting from this analysis:

Green, P. Q., Chung, W., Leshchinsky, B., Belart, F., Sessions, J., Fitzgerald, S. A., Wimer, J. A., Cushing, T., Garland, J. J. (2019). Insight into the productivity, cost and soil impacts of cable-assisted harvester-forwarder thinning in western Oregon. *For. Sci.* 66(1):82–9

Key Point of the Green paper include:

- The use of cable assistance can reduce track coverage and reduce shear displacement, and thus likely lessen potential soil impact caused by forestry machines.

Garland, J., F. Belart, R. Crawford, W. Chung, T. Cushing, S. Fitzgerald, P. Green, et al. 2019. Safety in steep slope logging operations. *J. Agromedicine* 24(2):138–145.

Key Point of the Garland paper include:

- Use of new tethered-assist technology reduces exposure to hazards and reduces workers exposed to the most dangerous work in logging—felling and working on cable operations on steep slopes.

## WET SEASON OPERATIONS

Another issue affecting the ability of our members to feasibly deliver logs to their mills is firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). **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.

Constructing forest roads is essential if active management is desired, and we are glad that the Forest Service is proposing the roads that are needed to access and treat as much as 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. The ability to haul timber in the winter months will often make the difference between a sale selling and not. **We urge the MRD to include allowance for wet season haul for roads which are adequately designed for wet weather use.**

Similarly, it is critical that the Forest Service retain some flexibility in this EA to allow for ground-based operations to continue during the wet season in situations where soil moisture is low, or where remediations can be made to reduce or eliminate impacts of ground-based operations on soil resources. **We urge the MRD to include allowance in the Tie EA PDFs for ground-based operations to continue during the wet season where conditions are favorable.**

## ROCK SOURCE DEVELOPEMENT

Another factor contributing to timber sale economic viability is rock source for required and/or optional road work. Costs associated with hauling rock long distances has 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. **The value-added by providing a local rock source should be analyzed in the ensuing EA.**

## ROAD DECOMMISSIONING

Your scoping notice indicates that the forest is proposing to decommission only temporary non-system roads within the Tie project. **If additional road decommissioning is proposed in the EA, AFRC recommends that the Forest limit their selection to roads that are no longer needed for resource management and are at risk of failure or are contributing sediment to streams, consistent with valid existing rights.** The land base covered in the project area is to be managed for a variety of forest management objectives. Removal of adequate access to these lands would compromise the agency's ability to achieve these objectives.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision-making process for Tie Project. **If the MRD plans a public field trip for the Tie project, please notify me of the date and location, and I will prioritize my attendance.** Should you have any questions regarding the above comments, please contact me at 541-521-9143 or [cbingaman@amforest.org](mailto:cbingaman@amforest.org).

Sincerely,



Corey Bingaman  
Western Oregon Field Coordinator  
American Forest Resource Council