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Title:
Comments: Thank you for the opportunity to comment on the Glass Project (Glass) draft environmental assessment (DEA). Glass is located on the Walla Walla Ranger District of the Umatilla National Forest in Umatilla County, Oregon approximately 16 miles north of Elgin and 30 miles northeast of Mission. The project encompasses approximately 28,870 acres with approximately 32,000 acres on National Forest System Lands (NFS). This area is a very important and popular to the residents of the area and to American Forest Resource Council (AFRC) members.

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 Umatilla 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 forest sector employs approximately 76,000 Oregonians, with AFRC[rsquo]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. Many of these are found in rural communities, such as those adjacent to Walla Walla Ranger District. Wages paid, income taxes, and other monetary transactions generated by these businesses and family-wage jobs substantially contribute to the infrastructure and well-being of the local communities.

Purpose and Need

AFRC supports the landscape scale and [ldquo]all hands all lands approach[rdquo] for management and supports forest plan amendments, treatments in riparian reserves, treatments in Late and Old Structure (LOS) stands, and removal of trees greater than 21 inches at dbh to meet project objectives. Our members depend on a predictable and economical supply of timber products off

Forest Service lands to run their businesses and to provide useful wood products to the American public. The treatments on the Glass Project will likely provide short-term products for the local industry and we want to ensure that this provision is an important consideration for the decision maker as the project progresses. As we will discuss later in our comments, the importance of our members[rsquo] ability to harvest and remove these timber products from the timber sales generated off this project is paramount. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on NFS lands, particularly those lands designated as timber and range, but also on lands designated as old growth, riparian and winter range.

Maximizing Treatment Area

The consideration of active management on every acre of appropriate land, regardless of its land allocation, is important to our membership as each year[rsquo]s timber sale program is a function of the treatment of aggregate forested stands across the landscape. Based on the Glass DEA, it appears that the proposed action (Alternative 1) is proposing commercial and noncommercial treatments, including riparian areas on approximately 15 percent of the project area, which is unacceptable. AFRC would like to see the agency treat a much higher

proportion of the landscape. It appears that only [ldquo]plantations[rdquo] are being treated in the Glass planning area rather than all previous managed acres. Why is this? The limited number of acres proposed to be treated is too small to meet the purpose of improving landscape resilience; is too small to move species composition closer to historical ranges; is too small to be meaningful in reducing high density conditions; and doesn[rsquo]t meet the need to decrease multi-strata forest structure.

The Ecology and Management of Mixed Conifer Forests in Eastern Oregon and Washington (Stine, et. al. 2014) outlines key management considerations on page iv. Those key management considerations are: 1) Historical range of variation is useful as a guide but not as target, 2) Disturbance regimes have been significantly altered after 150 years of Euro-American land use, 3) Moist mixed-conifer forests are more vulnerable to large, high severity fire and insect outbreaks, and 4) Patterns of vegetation structure and composition in an eastside forest landscape shaped by intact disturbance regimes are diverse and differ over space and time. This research represents the [ldquo]best available science[rdquo] for managing mixed conifer forests in eastern Oregon yet it appears it was largely ignored in the development of the Glass project. The Glass planning area has 8,719 acres in the timber emphasis area and 13,535 acres in the wildlife emphasis area in the Umatilla National Forest Land and Resource Management Plan. The Glass planning area presents a tremendous opportunity to meet the purpose and need by creating meaningful openings of various sizes, by feathering edges of openings for wildlife, and by improving landscape resilience by adequately reducing densities.

Economics and Operating Restrictions

The timber products provided by the Forest Service are crucial to the health of our membership and local economy. 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. To be clear, we are advocating that you consider the economic viability of the project and make sure that it is designed in a way that makes sense for the market. This is not the same thing as maximizing economic value of the project.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to manage 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 EAs, EISs, and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We are glad to see that the Umatilla is shifting their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results. There are a variety of operators that work in the Umatilla 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. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposed area is planned for skyline harvest, there are opportunities to use certain ground

equipment such as feller bunchers and processors in the units to make skyline yarding more efficient. Allowing the use of processors and feller bunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of skyline corridors, reduce damage to the residual stand, and provide a more even distribution of woody debris following harvest. It is absolutely critical that all units that contain skyline yarding be identified as [ldquo]skyline/tractor[rdquo] in contracts and be analyzed for both skyline and ground-based logging during the environmental analysis to provide maximum flexibility during implementation. This flexibility allows our members to work with Forest Service personnel to achieve the best environmental results on the ground and will maximize the returns to the agency for timber removed.

Roads

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. 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 or not, and we are glad the Forest Service is working to accommodate this by proposing rock application to roads that include skyline yarding systems.

AFRC urges the Forest Service to utilize existing road beds and closed roads for temporary road construction required to access the Glass Project area whenever possible. Generally, we do not support permanently decommissioning roads and removing them from the system as these roads are often necessary for future access and management activities. Utilizing other methods to prohibit use of these roads, such as gates and barriers, is a much better use of limited dollars while providing flexibility for unknown future needs on the landscape. AFRC recognizes that closing roads in this area is extremely difficult because of the flat terrain, which begs the question how will the Forest prevent the public from establishing new roads? Especially after the management of the project is complete and the landscape is much more open.

Riparian Area Treatment

AFRC supports work in riparian areas in the Glass planning area and urges the Forest Service to consider more acres of proactive management in riparian reserves/riparian conservation areas. Typically, the overstocked and uniform stand characteristics that exist in the uplands also exist in the riparian areas. It has been well documented that thinning in riparian areas accelerates the stand[rsquo]s trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of small diameter suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that INFISH mandates should be considered.

Please remove Section 1.13 Management Requirements, Project Design Features, and Best Management Practices Common to All Alternatives place it in the appendices. The information in this section does not belong in the body of the EA. These criteria are standard best management practices and are required on all contracts and fully described therein.

Thank you for the opportunity to provide comments on the Glass DEA. I look forward to following the implementation of this project as it moves forward.