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David Warnack, Forest Supervisor

C/O Hilary Krieger, NEPA Planner

Middle Fork Ranger District

46375 Highway 58

Westfir, OR 97492

In Reply To: Youngs Rock Rigdon DEIS

Dear Ms. Krieger:

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 Middle Fork Ranger District, 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 glad to see the Middle Fork District proposing vegetation management treatments on their Matrix and Riparian Reserve Land Allocations that strives to provide a sustainable and reliable supply of timber products in an economically viable manner. The long-term sustainability of these timber products is crucial for the long-term viability of our membership and the communities they support, and the Matrix land allocation is the only portion of the National Forest System where timber management under the principles of sustained yield can be relied upon. We appreciate the Middle Fork District proposing treatments that will yield wood products our members can utilize, as well as treatments that will address the sustainability of the timber resources by implementing regeneration harvest. We are glad to see a purpose & need that clearly describes the statutory direction that the USFS is under that requires timber resources to be managed in a sustainable manner. We also applaud the Middle Fork District for recognizing the role that regeneration harvest treatments have in a sustainable management paradigm for Douglas-fir dominated forests in the region. Proposing such treatments in the Youngs Rock Rigdon project addresses the shortcomings of the current [ldquo]thinning only[rdquo] management paradigm that has dominated the Forest Service's vegetation management program in the Pacific Northwest for decades. Based on fundamental forestry principles and the ecology of Douglas-fir forests, it is impossible to manage timber resources sustainably in this region in the absence of regeneration harvest. The Forest Service cannot thin forever. Ultimately the Forest Service will run out of stands to thin, and by that point the forest age-class distribution will be far out of balance to the point where the reliability and sustainability of its timber supplies will be compromised.

AFRC would like to encourage the District to select and implement the Action Alternative that best meets the described project purpose and need. We believe that optimal attainment of the purpose and need is realized by implementing treatments and activities that address each project component to the maximum extent possible. For example, attainment of the purpose of improving stand conditions is better achieved by applying variable density thinning treatments to 500 acres of forest land as opposed to 400 acres of forest land. Treating 400 acres meets the purpose and need—but not to the same level that treating 500 acres would. Furthermore, we believe the selected alternative should also meet each of the described project purposes; this includes 1.) Improve stand and landscape diversity, structure, and resiliency; 2.) Increase diversity and structure in mixed

conifer forest; 3.) Increase diversity and structure in moist forest; 4.) Strategically reduce hazardous fuels; and 5.) Provide a sustainable supply of forest products. We believe that, based on the substance of the EIS, Alternative 2 meets each element of the Purpose & Need to a higher degree than Alternative 3. Alternative 3, which defers management treatments on portions of the NSO CHU, meets these objectives, but to a lesser degree as treatment acres are reduced.

In addition to the attainment of the purpose and need being diminished, the treatment deferrals in Alternative 3 do not align well the substance of the NSO CHU. The intent, as it was written, of the CHU was not to prohibit regeneration harvest or any treatment that downgrades or removes NSO habitat across all 9 million acres of the Unit. Nor did the CHU in any way modify the Forest's existing LRMP. In fact, the Fish & Wildlife Service was explicit in prescribing the opposite:

[bull] We recognize that ecological restoration is not the management goal on all NWFP land use allocations (e.g. matrix) within designated critical habitat, and we provide a discussion of options land managers could consider to tailor traditional forest management activities on these lands to be consistent with conservation of current and future NSO habitat (pg. 27).

[bull] On Matrix lands under the NWFP where land managers have a range of management goals, the Service anticipates that not all forest management projects in critical habitat will be focused on the development or conservation of northern spotted owl habitat (pg. 283).

[bull] Targeted variable-retention harvest could be considered where the conservation of complex early seral forest habitat is a management goal (pg. 284).

We urge the District to not conflate CHU goals with LRMP direction. The CHU did not replace the LRMP direction in Matrix land to manage for a sustainable supply of timber products. At most, the CHU altered the path appropriate for the District to take in order to meet this direction. Please consider this perspective of the relationship between LRMP direction and the CHU as well as the attainment of the Purpose and Need as you make decisions on Alternative selection for this project.

AFRC is glad to see that the Forest Service is taking a proactive approach to treating riparian reserves. However, we are disappointed to see that riparian treatments were deferred under both action Alternatives on stands identified as [ldquo]natural.[rdquo] After visiting several stands proposed for treatment it's clear that the undesired forest conditions that exist in the uplands also exist in the riparian reserves; this is true of both managed stands and [ldquo]natural[rdquo] stands. Those upland forests (outside of riparian reserves) are receiving treatments to reduce hazardous fuels and improve diversity and structure. It is unclear why those objectives are not desirable or appropriate in riparian areas. In fact, some literature has indicated that treatments designed to restore dry forest ecosystems are critical in riparian areas:

Messier, Michael S., Shattford, Jeff P.A., and Hibbs, David E. 2011. Fire Exclusion effects on riparian forest dynamics in southwestern Oregon. *Forest Ecology and Management*. 264 (2012) 60-71.

Key points of the Messier paper include:

\* Fire exclusion has altered the structure, composition, and successional trajectory of riparian forests in fire-prone landscapes.

[bull] Fire exclusion has been associated with increase in tree density and recruitment of shade-tolerant species that may replace large diameter, more decay-resistant Douglas-fir trees.

[bull] A hands-off management regime for these riparian forests will have ecologically undesirable consequences.

It's unclear what tradeoffs the District considered when deferring treatments in riparian areas, but we believe it is fair to assume that the [ldquo]hands-off[rdquo] approach taken will have detrimental effects to the forestland impacted.

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.

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 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). 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 Middle Fork market area with a variety of skills and equipment. Developing a contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. It appears, based on the effects-analysis on listed fish species, that the District is analyzing for wet weather haul operations. We appreciate this consideration for the allowance of an extended operation season. Resource damage can be avoided on activities such as timber haul and ground-based yarding during moderately wet periods as long as mitigative measures are effectively implemented in a timely manner.

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 and not, and we hope that the District is working to accommodate this. This is particularly critical when offering timber sales that include a component of helicopter yarding. 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 rockered to permit wet season hauling is critical to the successful implementation of those units.

We also appreciate the recognition of tethered-assist equipment. However, the restrictions applied to this equipment outline in PDF AQU-38 seem excessive based on this equipment's capabilities. This PDF limits the use of tethered-assist to the dry season and limits the amount of passes on each corridor. The technology associated with this equipment actually allows for less ground disturbance than cable systems. This is due to the weight displacement afforded by the tethering. 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 generated by the tracked equipment. Ultimately, we believe that imposing such specific parameters on tethered equipment, such as number of passes, is unnecessary as long as soil disturbance requirements are adhered to. In other words, if a piece of equipment is being operated in a manner that is minimizing ground disturbance, then it is not necessary to limit the degree which it is operating. Please consider amending this PDF to permit flexibility to tethered operators so long as soil damage thresholds are adhered to.

An intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The proposed miles of road decommissioning likely represent a permanent removal of these roads and likely the deferral of management of those forest stands that they provide access to. Lands designated as Matrix are the only lands where our members can depend upon a long-term supply of timber products. Removal of adequate access to these lands compromises the agency's ability to achieve this long-term supply and is very concerning to us.

Recommendations provided in the Road Investment Strategy (RIS) will likely be a starting point for the District to consider road infrastructure needs. The RIS directs the agency to analyze roads for decommissioning where [ldquo]the resource risk from these roads potentially outweighs the access value and the road is very unlikely to be needed for administrative use in the future.[rdquo] The Strategy also directs the agency to analyze roads for closure where [ldquo]the resource risk from these roads potentially outweighs the access value, but the road may be needed for administrative use in the future.[rdquo]

We would like the District to carefully consider the follow three factors when making a decision to decommission any road in the project area:

1. Determination of any potential resource risk related to a road segment
2. Determination of the access value provided by a road segment
3. Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.

AFRC is happy to be involved in the planning, Environmental Impact Statement, and decision-making process for the Youngs Rock Rigdon project. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or [ageissler@amforest.org](mailto:ageissler@amforest.org)

Sincerely,

Andy Geissler  
Federal Timber Program Manager American Forest Resource Council