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Title:
Comments: November 24, 2021

Nikki Swanson, District Ranger

Willamette National Forest

Sweet Home Ranger District

4431 Highway 20

Sweet Home, OR 97386

In Reply To: QMS EA

Dear Ms. Swanson:

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 Sweet Home 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 76,000 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 Sweet Home Ranger District proposing vegetation management on Matrix, Late-Successional Reserve (LSR), and Riparian Reserve (RR) lands 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, and we thank the Willamette National Forest for continuing to be a reliable source of these products year after year. We are also glad to see that the District 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 QMS 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 Sweet Home District for recognizing this in the QMS project.

Since the inception of the Northwest Forest Plan (NWFP) the Willamette National Forest has largely abandoned

any level of regeneration harvest on lands designated as Matrix. This truth is validated by Figure 11 in the Draft EA that illustrates the age-class distribution in the project area and indicates that "less than 0.01% of the land managed by the Forest Service within the QMS project area is 0 to 15 years of age." These Matrix lands are the only designated lands on the Willamette where sustainable timber management may occur. This sustainability is crucially important to AFRC's members and we continuously advocate for forest management that addresses it. The "thinning-only" management paradigm adopted by the Willamette National Forest since the NWFP was signed has provided a short-term supply of timber products, but unfortunately cannot fulfill the sustained long-term supply that we believe the Forest Service is mandated to provide; in other words, the stands suitable for thinning will eventually be depleted. Douglas-fir forests require regeneration harvest at some point in their life-cycle to regenerate. It is refreshing to see some level of regeneration harvest proposed on the QMS project and urge the District to select and implement the alternative that considers this silvicultural practice. The 140-200 acres of regeneration harvest (shelterwood) is a small but important step toward progressing to a balanced silvicultural regime and ensuring the long-term sustainability of the District's timber supply.

We urge the District to select and implement the alternative that meets the purpose and need to the highest degree. 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 growth, diversity, and structure in young, dense plantations 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[mdash]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) contribute to a predictable, sustainable supply of forest products to help maintain the stability of local and regional economies and markets; 2) improve stand growth, diversity, and structure in young, dense plantations within LSR in order to promote late-successional conditions; 3) create diversity in structure and age class across the project area; and 4) sustainably manage the network of roads in the QMS project area by identifying a minimum roads system. We believe that, based on the substance of the EA, Alternative 2 meets each element of the Purpose & Need to a higher degree than Alternatives 3 or 4.

Furthermore, we don't believe that either alternative 3 or 4 were developed based on "key issues" that are aligned with your LRMP. Alternative 3 was partly developed in response to a public scoping comment asserting that "shelterwood with reserve harvest treatments adversely impact the older stand conditions in the Matrix. Treatments in these stands should focus only on late seral creation or restoration." Late seral creation and restoration of late seral conditions are not objectives for Matrix land. It is true that the Northwest Forest Plan directs the Forest Service to maintain a small percentage of Matrix land in a late seral condition. However, Figure 11 on page 14 of the EA clearly shows that 69% of the project area is over the age of 80 and 52% is over the age of 150; so that forest plan requirement has clearly been met and exceeded.

Alternative 4 was developed partly in response to a public comment that asserted "Harvest treatments should not occur in stands over 80 years of age because that age class is underrepresented in the project area and should be preserved on the landscape." Actually, stands over 80 years of age are overrepresented in the project area. As we stated earlier: Figure 11 on page 14 of the EA clearly shows that 69% of the project area is over the age of 80.

Ultimately, we believe that the Forest Service should not have identified these two issues as "key" issues and should not have developed either action alternative in response to them. The most appropriate course at this point is for the Sweet Home District to acknowledge that these alternatives were based on flawed issues and, consequently, do not meet the purpose and need as well as alternative 2.

RIPARIAN RESERVES

We continue to be perplexed with the rationale used on the Sweet Home District for determining stand treatment needs based solely on stand age in riparian reserve. In our opinion, decisions on which stands warrant treatment in the land allocation should be made based primarily on stand conditions, rather than arbitrary thresholds. The most common of these arbitrary thresholds that has inhibited the Forest Service from accomplishing the intent of the Aquatic Conservation Strategy is stand age. The random number of "80" has been chosen to be an important threshold that separates stands in riparian reserve that warrant treatment and those that do not. As a forester that has been practicing in the Pacific Northwest for over twelve years, I know that stand age is a poor surrogate for determining treatment needs of a stand. I have visited 79-year-old riparian stands that do not warrant treatment and 81-year-old stands that do warrant treatment. Yet for some reason, this 80-year threshold continues to be given credence on many Forest Service vegetation management projects. We urge to you to review the Hwy 46 EIS on the Detroit District. The analysis on page 128 states that "Stand conditions were reviewed for each waterbody and recommendations were based on multiple variables, not just age. These factors included tree height and diameter, stand density, species composition, and understory development. Most stands where thinning would occur within Riparian Reserves are under 80 years old (73%), however, 187 acres of Riparian Reserves in stands aged over 80 years old would be thinned." We hope that the Sweet Home District will, someday, take the same stand-condition based approach to managing in riparian reserves and move beyond the notion that age is the ultimate gauge for treatment needs.

FIRE AND FUELS

We appreciate the discussion in the EA on fire and fuels, particularly the recognition that there is competing science on the impact that timber harvest has on fire risk and fire hazard. We believe the condition following commercial timber harvest implementation is best summarized on page 180 of the EA: "While stands would see a short-term increased hazard from fire post-harvest, over the long term, individual trees would become more fire resistant as increased growth rates create larger diameter, thicker barked trees that are able to withstand higher temperatures in the event of a wildfire." It is unclear in the EA when the Forest Service believes the short-term risk transitions to a long-term benefit. However, we presume that over the course of the next 30 years following treatment there will be more years of benefit than cost in terms of fire risk and hazard. In other words, the short-term risks are short and the long-term benefits are long. Therefore, we are concerned with the first sentence in the effect-analysis for the action alternatives which states that "following timber harvest, there would be an increase in potential wildfire behavior." This proclamation is misleading and distorts the long-term

benefits of treatment. Please consider rewriting this statement to read: "following timber harvest, there would be a short-term increase in potential wildfire behavior followed by many years of reduced wildfire behavior."

Furthermore, we have concerns with how fire intensity and fire severity are being conflated in the EA. Page 179 states that "Following timber harvest, stands would see an increase in the amount of fuel distributed on the forest floor. These elevated fuel loadings would create potential for increased fire intensity." We disagree. According to Keeley (2009)1, fire intensity is defined as how much energy and heat a fire emits, whereas fire severity is defined as a measure of how much of the affected fuel is consumed by a fire. So, for example, a grass field may burn at high severity but low intensity[mdash]100% of the grass is consumed by the fire, but not a whole lot of energy and heat is emitted. On the other hand, a fire burning through an 80-year old Douglas-fir forest may burn at medium severity but high intensity. Only 70% of the fuel is consumed but a high amount of energy and heat is emitted. The scenario outlined on page 179 of the EA is discussing fuel on the forest floor. We agree that that fuel may burn at a higher severity than if the stand had not been treated, but we disagree that it would burn at a higher intensity. This scenario is also limiting its scope to ground fires following thinning and ignoring the potential for crown fires in the absence of thinning.

Asserting that post-thinning activity fuels will increase fire intensity incorrectly assumes that a fire started in that stand without thinning would be limited to the ground and not shift to the crowns. So why is the assumption that the fire is burning at ground level? Why didn't the Forest Service consider a fire burning at the crown level in un-thinned stands? Would not a crown fire burning through an un-thinned 60-year old stand be more hazardous to life and property than a fire burning through the understory of that same 60-year old stand, but after thinning?

Ultimately, we believe that the Forest Service recognizes the risk of high intensity crown fires. Yet some of the statements in the EA suggest that the Forest Service is looking at fire risk and hazard in forest conditions following thinning treatments in a vacuum where little to no consideration is given to what the fire risk and hazard would be under the alternative where those stands are not thinned and fire burns through them regardless.

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.

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 Sweet Home 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 flexible 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 rocked to permit wet season hauling is critical to the successful implementation of those units.

We noticed that the EA failed to recognize 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 Sweet Home District to consider allowing this equipment to be used where appropriate on the QMS 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. Please see the attached letter that was issued on the Siuslaw National Forest that allowed this equipment to be used on a signed NEPA decision.

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 "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." The Strategy also directs the agency to analyze roads for closure where "the resource risk from these roads potentially outweighs the access value, but the road may be needed for administrative use in the future."

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 assessment (EA), and decision-making process for the QMS EA. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or ageissler@amforest.org.

Sincerely,

Andy Geissler

Federal Timber Program Director

American Forest Resource Council