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First name: Andy
Last name: Geissler
Organization: AFRC
Title: Federal Timber Program Director
Comments: Text of attached letter

In Reply To: 2020 Fire Affected Road System Risk Reduction Scoping

Dear Mr. Warnack:

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[rsquo]s forest sector employs approximately 61,000 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.

AFRC is extremely disappointed with the outcome of the Willamette National Forest[rsquo]s efforts in 2021 to remove fire-damaged trees posing a hazard to its road network. Similar outcomes have occurred on other Forests who were impacted by the 2020 Labor Day fires; this includes the Mt Hood, Umpqua, and Rogue River-Siskiyou National

Forests. These outcomes are not due to any failure or lack of effort by the Forest Service, but rather the result of legal challenges by special interest groups and subsequent rulings by multiple courts. The fact that removing fire-damaged hazard trees and utilizing those trees for manufacture into wood products has become "controversial" in 2021 is disturbing. The fact that the Forest Service will now, instead, be compelled to spend millions of taxpayer dollars to fell those trees and leave them in a pile or permanently close roads to public access is also disturbing to AFRC. The fact that those millions of dollars will cause capacity from other programs to be siphoned in a manner that will (has already) result in a diminished vegetation management and timber program is disturbing. The escalating level of risk to tree fallers is disturbing. The narrative around hazard tree abatement has been centered around the visiting public. However, the highest level of risk from these hazard trees will be imposed on those forest workers tasked with felling them. And that risk level has escalated every day since the fire due to the progression of deterioration. Those dead and dying trees are deteriorating each day they remain standing. The safety risk to fallers is higher today than it was a year ago, and it will be higher a year from now than it is today.

We hope that the Forest Service emerges from the disastrous 2021 hazard tree removal effort by adapting to the unfortunate court rulings and develops a more effective strategy for future years in a way that will allow a portion of fire-damaged hazard trees to be promptly removed and utilized as timber products.

It is also frustrating that this planning team could be focused on analyzing a new vegetation management project that reduces fuels, improves forest health, and contributes timber to the local economy, but instead is focused on reassessing a task that was already analyzed in 2021 with a CE. Many National Forests that are periodically impacted by wildfire are stuck in a cycle that is crippling their ability to analyze and implement vegetation

management projects designed to reduce the likelihood of future wildfires. That cycle is driven by the shifting of NEPA planning teams from the analysis of "green" vegetation management projects to the analysis of post-fire mitigation projects. The completion of those green projects is complicated every year that they are stalled, and ultimately, they become more prone to wildfire themselves. This project is a prime example of this paradigm. The Willamette National Forest should be focusing on proactive management in 2022, not on hazard tree removal nearly two years after a fire event.

In a letter to the Regional Forester in December, AFRC made the following requests and recommendations:

The Forest Service has been particularly challenged in its efforts to remove dead and dying trees that pose a safety hazard to open Forest Service roads following the 2020 wildfires. The time and cost dedicated to addressing these hazard trees comes at the expense of accelerating vegetation management designed to mitigate future catastrophic fire events. We are beginning to see a dangerous cycle where implementation of fuels reduction and density management projects are delayed in lieu of removing hazard trees and restoring road access [ndash] many months after suppression activities concluded.

Given this obstacle to active management, we believe that it is appropriate and prudent for the Pacific Northwest Region to pursue allocation of both the $175 Million for burned area recovery and the $475 Million for Capital Improvement and Maintenance toward the prompt removal and sale of fire-damaged trees posing a hazard to the Forest Service road system. Doing so would not only facilitate access needed for effective fire suppression in future years, but it would also alleviate the burden placed on Forest staff and enable them to refocus their attention and energy on vegetation management that is desperately needed to mitigate future risk of more catastrophic fire events.

Ideally, no Forest should have to sacrifice the implementation of a priority vegetation management project in order to attempt to complete hazard tree removal work. In the future, it is critical that the Forest Service accomplish needed hazard tree removals as part of its suppression activities, so forests aren[rsquo]t forced into this difficult position.

The Forest Service has more funding at its disposal to augment its management efforts in 2022 than any year in recent memory. This includes $78.6 million in Disaster Relief funding. It[rsquo]s disappointing to see the Forest Service fail to properly leverage those funds to assist with overdue workload from the 2020 wildfire season. Instead, those funds are sucking resources from the active management program. Several timber sales planned for 2022 have already been dropped due to this additional funding and the Willamette[rsquo]s planned offerings for FY22 are at a 20-year low.

Our disappointment in the likely use of taxpayer dollars to fund this work was outlined above. We would like to see a thorough economic analysis in the ensuing EA that calculates the likely costs incurred to fell and possibly remove the hazard trees that have lost their timber value. Such calculations could and should be done for every road mile treated. We would also like to see the internal costs to the Forest Service staff tasked with completing this analysis disclosed in the EA.

We would like to see an analysis competed that assesses the impacts to CO2 emissions as a result of felling and leaving these hazard trees on the forest floor or burning them as firewood. The inability to promptly remove these hazard trees will not only be realized as a loss of potential funds from the sale of timber, but also as a loss of potential carbon storage in wood products versus carbon release into the atmosphere through down-wood deterioration or through the sale of firewood, which will of course be burned. Please analyze the likely CO2 emissions from the proposed action based on an assumption of either a.) material left on site, and b.) material sold as firewood to be burned.

In the absence of timber salvage, these dead trees 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 (Gustavasson 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., Kl[Ouml]hn, S., [hellip] Spelter, H. (2006). The Role of Wood Material for Greenhouse Gas Mitigation. Mitigation and Adaptation Strategies for Global Change, 11(5[ndash]6), 1097[ndash]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.

We would like to see an analysis of the impacts to hazardous fuels resulting from the retention of hazard trees on the forest floor. Much of this material would have been removed had these hazards been addressed through timber sales. Those sales would have also included activity fuels treatments such as pile and burning. Please disclose the amount of fuels retained through the likely scenario of fall & leave and those may impact fire risk. Consider incorporating the literature cited below:

Peterson, David W, Dodson, Erich K, Harrod, Richy J. Post-fire logging reduces surface woody fuels up to four decades following wildfire. Forest Ecology and Management. 338 (2015) 84-91.

Key points/findings of the Peterson paper include:

* Post fire logging can significantly reduce future surface woody fuel levels in forests regenerating following wildfires.

We assume that the Forest Service may be considering road closure and road decommissioning as a method of mitigate risk to the public. An intact road system is critical to the management of Forest Service land. 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, effectively treat their lands to reduce hazardous fuels, and safely suppress wildfires. The road decommissioning proposed in the scoping notice likely represents a permanent removal of these roads and likely the deferral of management of those forest stands that they provide access to. The land base covered in the project area are to be managed for a variety of forest management objectives. Removal of adequate access

to these lands compromises the agency[rsquo]s ability to achieve these objectives and is very concerning to us.

We would like the Forest to carefully consider the following 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 believes that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency[rsquo]s subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to quickly and directly attack nascent fires. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.

If the Forest Service proposes to decommission or close road segments from the planning area, we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, addional and improved roads will enable firefighters quicker and safer access to suppress any fires that are ignited.

Furthermore, we assume that any roads proposed for closure will likely have danger trees remaining adjacent to them following the completion of this project. Safe and effective ingress and egress for firefighters along those roads will be significantly compromised until those trees can be removed. Please analyze in the ensuing EA the impacts that closing these roads will have on access for fire suppression and firefighter safety if access is secured.

Adequate documentation of the Field Guide for Danger-Tree Identification is advisable for hazard tree removal. Recent court rulings have indicated some confusion regarding the use of the Field Guide to identify hazard trees that have potential to impact roads. In particular, there have been questions regarding whether a specific tree poses an "imminent" hazard. Therefore, we recommend that you highlight and outline certain components of your guidelines in the EA, including:

* Thorough explanation of tree falling dynamics on level ground, including the effects of wind events, force of breakage, and how fallen trees may impact other nearby trees (causing broken tops, etc.)
* Thorough explanation of tree falling dynamics on sloped ground, including the likelihood of downslope trees falling uphill
* Emphasis on how the Danger Tree Guidelines identify both the "Tree Failure Potential" and the "Potential Failure Zone". Specifically note that any given tree has a Failure Zone and describe how that failure zone is

determined.

If the Forest Service does complete the EA in a prompt manner and is able to capture some timber value from the fire-damaged trees we urge you to acknowledge that standard utilization specifications used on green Forest Service timber sales will not likely be appropriate for any salvage sales generated from this EA. Due to the damaged nature of the timber products being proposed for harvest, there will be an unusually high level of uncertainty by the Forest Service and prospective purchasers of the actual value of those products on the stump prior to harvest. This uncertainly is exacerbated by the fact that additional time for wood deterioration will elapse between the time of purchase and the time of harvest. Therefore, the Forest Service should be developing minimum removal requirements and utilization specifications that align with this uncertainly. Purchasers will recover as much value from these damaged products as possible. Required them to recover value that is not available will reduce the likelihood that these sales will successfully sell.

AFRC is happy to be involved in the planning, Environmental Assessment, and decision-making process for the 2020 Fire Affected Road System Risk Reduction Assessment. 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 Coun