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Title:
Comments: 2020 Fire Affected Road System Risk Reduction Project

Elsa, comments from AFRC on the 2020 Fire Affected Road System Risk Reduction Project EA are attached.

Andy Geissler, Federal Timber Program Director

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Text of attached letter:

July 11, 2022

Duane Bishop Acting Forest Supervisor

Willamette National Forest 3106 Pierce Parkway Suite D Springfield, OR 97477

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

Dear Mr. Bishop:

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.

The pace at which the Forest Service has been able to move toward addressing hazard trees and reopening roads to the public following the 2020 Labor Day Fires has been extremely discouraging to AFRC. This pace is not largely the fault of the Forest Service, but rather of special interest groups who wish to see the public exposed tohazards while visiting National Forests, or to see those National Forests completely shut off to public access. We, on the other hand, believe that public access should be restored promptly, and those trees felled for safety concerns should be utilized for the production of wood products. We[rsquo]re confident that the Forest Service will identify a more streamlined approach to dealing with hazard trees following wildfire events in the future.

Despite these excessive delays, we believe there may still be opportunities to recover timber value from fire-killed trees on this project. The Bureau of Land Management continues to successfully sell salvage sales and danger tree sales off the Beachie and Riverside fires. The Willamette could do the same if the implementation of this project is not delayed any further than it already has been.

In the interest of not delaying implementation even further, we strongly recommend that the Willamette National Forest exercise the authority under 36 CFR 218.21 for Emergency Actions. That authority allows the agency to immediately implement actions that provide [ldquo]relief from hazards threatening human health and safety.[rdquo] That CFR indicates that the proper notification for using this authority is issued at the time of the Decision. Furthermore, Section 40807 of the Bipartisan Infrastructure Law (BIL) included authorizations associated with the Emergency Actions statute specifically for [ldquo]the removal of hazardous trees in close proximity to roads and trails.[rdquo] A letter to the Regional Foresters dated April 25, 2022, from Chief Randy Moore addressed the [ldquo]Use of New and Existing NEPA Authorities to Confront the Wildfire Crisis.[rdquo] Among other efficiency tools, that letter specifically acknowledged the Emergency Actions authority in the BIL as a means to address the wildfire crisis. We urge the Willamette National Forest to respond to this call from the Chief by promptly exercising the authorities under 36 CFR 218.21 and the BIL to expedite the removal and utilization of trees posing a hazard to the visiting public.

We have numerous concerns with the substance, design features, and analysis contained in the EA that are outlined below.

The project design features in the proposed action do not adhere to the current agency guidelines

Current guidelines for identifying and addressing hazard trees on U.S. Forest Service land are included in the Field Guide for Danger-Tree Identification and Response along Forest Roads and Work Sites in Oregon and Washington, 2016. That Field Guide includes various specifics on how to identify hazard trees in the context of their proximity to roads, campgrounds, and other potential target areas. Pages 38-42 include specifics on identifying Potential-Failure Zones. Copied below is the guidance for trees on level ground.

(see attachment for figure)

This guidance clearly indicates a potential failure zone of at least 1 [frac12] times the damaged tree. For trees experiencing 100% mortality, this would be 1 [frac12] times the height of the tree.

Yet the Willamette National Forest has opted to ignore this guidance and instead adopt design feature where [ldquo]a 100-foot-tall tree within 90-feet of the road would be fallen. However, should that same tree be 110-feet away from the road it would be left standing[rdquo] (EA, pp. 11). Under this scenario, a hazard tree within the failure zone of an open road would be left standing.

Please explain why the Forest Service has decided to design this project in contradiction with your current guidelines when public safety and access are at risk?

The proposed action is misusing the Road Investment Strategy

The Road Investment Strategy (RIS) includes recommendations based on potential resource risks. For example, roads identified in the RIS as [ldquo]Analyze for Decommissioning[rdquo] are to be assessed at the project level as to whether [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] It does not appear that the Forest Service is conducting this project level assessment to determine whether these [ldquo]potential[rdquo] risks outweigh access value, and instead simply deferring treatment of ALL of those roads identified in the RIS.

Please explain why the Forest Service is treating hazards along the minimum number of roads and ignoring those roads that [ldquo]may[rdquo] be of low need for access.

Please explain why the Forest Service is ignoring the [ldquo]guidance[rdquo] from the Danger Tree Field Guide and following the [ldquo]guidance[rdquo] from the RIS to a level above & beyond how it should be.

The proposed action contains design features not aligned with your management plan

Page 13 of the EA indicates that [ldquo]Outside of Riparian Reserves, 7 to 10 trees that are greater than 16 inches in diameter, or the largest diameter trees present, and at least 20 feet long would be left per acre.[rdquo] We assume this requirement is meant to meet the direction in the Northwest Forest Plan (NWFP) for coarse woody debris in the Matrix. That direction specifies that [ldquo]240 linear feet of logs per acre greater than or equal to 20 inches in diameter should be retained in regeneration units[rdquo] (there is no specific guidance for salvage). It[rsquo]s difficult to estimate how many linear feet of logs over 20 inches would be generated by felling and leaving 7-10 trees per acre; however, in many cases those felled trees would far exceed the 240 linear feet directive.

Why didn[rsquo]t the Forest Service simply include a design feature that mirrors the actual guideline from the NWFP?

Portions of the analysis on climate change are misguided

Under the [ldquo]Carbon Sequestration[rdquo] section, the EA states that [ldquo]should no action be taken, this project would not alter the current carbon stocks.[rdquo] Firstly, we are confused why the EA is assessing and focusing on the maintenance of carbon stocks on the forest floor in a section regarding sequestration. Secondly, we disagree that taking no action would not alter the current carbon stocks. AFRC believes the analysis of timber or biomass removal of dead material should be straightforward based on a simple truth: dead trees do not sequester carbon; they only emit it. By taking no action, the Forest Service would be ensuring that much of the dead material left on the forest floor will eventually emit currently stored carbon. On the other hand, removal of dead material for storage in long-lasting wood products would ensure that those dead trees do not release the carbon they had previously sequestered.

Furthermore, the analysis on page 26 of the EA simply focused on maintaining carbon stocks in the project area, which is a misguided assessment. How does temporarily maintaining carbon stocks on the forest floor in the short-term mitigate climate change, increase carbon storage, or accelerate carbon sequestration? Those carbon [ldquo]stocks[rdquo] are dead material that will only emit carbon, not sequester it. The assessment states that [ldquo]The proposed action also includes leaving at least 7 to 10 of the largest trees across all treated areas and all trees larger than 16 inches in diameter in Riparian Reserves. These aspects would help retain a great deal of the carbon stocks within the treatment area.[rdquo] The Forest Service[rsquo]s objective should not be to

[ldquo]retain carbon stocks on the forest floor[rdquo][mdash]the objective should be to store carbon in the long-term while accelerating sequestration. That objective would be best achieved by maximizing the transfer of dead material from the forest to long-lasting wood products and replanting those areas impacted. On the other hand, the majority of the carbon stored in those [ldquo]7-10 retained trees[rdquo] will eventually be emitted into the atmosphere via decomposition or during the next fire.

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 Council