

Data Submitted (UTC 11): 12/12/2023 3:06:38 AM

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Comments: I work as a harvester operator for Euchre Mountain Logging. We are based in Condon. I have harvested on FS stewardship sales. It continually frustrates me how often the marking crews are not able to overcome the low bar of consistently picking the healthy trees as the leave trees. Rumbling Owl represents a big chunk of commercial harvest in the valley. All the well orchestrated unit boundaries and prescription classes are great, but what actually matters is which trees are picked to cut and which are picked to leave. It is so easy to fumble this last step and it is by no means an arbitrary choice.

Place more trust in the pride of operators to do an excellent job and structure contracts with incentives to build competitiveness around getting great forestry accomplished, as well as penalties to differentiate bad actors and subpar work. Take a hard, honest look at the standard set by federal marking crews today. Build a contract framework where operators can meet or exceed that standard, while saving the agency the cost of marking and administration:

- Consider bidding a subset of timber sale as an unmarked DxP sale with staged penalties for deviation from target prescription.
- Weigh the cost of marking against the stumpage bids reflecting unmarked timber sale.
- Integrate remote sensing tech into DxP validation so that verification of higher complexity prescriptions is not cost prohibitive.
- Like the 'teach a man to fish' adage, it will be a struggle to make a precedent for this DxP contract framework, but once it's ironed out it reduces the sunk cost that the FS has into any timber harvest moving forward

Additionally, it is frustrating to see how the prescriptions handed down to marking crews are clearly one dimensional and treat clumps of trees as unhealthy and fumble the zero cost opportunity to allow structural complexity to be propagated as we manage for a variety of other resource values. Structural complexity should not be considered mutually exclusive with any other value. Use whatever means possible to integrate variability into residual stands:

- Resist the temptation to require a 'thorough' harvest.
- Find coincidental opportunities for greater operational efficiency and retention of ecological complexity within stand structure i.e. large, medium, small clumps/openings

Ideas for integrating operator tree selection or designation by prescription/description wherever possible:

- Articulate the desired future conditions for homogenous stands with simple stem spacing or basal area based metrics.
- Where a variable residual stand structure can be justified (most of sale area), give operators broad per acre targets for individuals, clumps, and openings (ICO) (see attached reference).
- Calibrate operators with small 1 acre test plots and account for administration time during this initial set up to validate target prescription.
- After this calibration, set up incentives in the form of percentage reduction in paid stumpage for perfect prescription execution, as well as a sliding scale of penalties proportional to the severity of misalignment of residual stand with explicit target.

Churchill, Derek J.; Jeronimo, Sean MA; Larson, Andrew J.; Fischer, Paul; Dahlgreen, Matt C.; and Franklin,

Jerry F., "The ICO Approach to Quantifying and Restoring Forest Spatial Pattern: Implementation Guide" (2016).
ICO App. 3.