



Via: <https://www.fs.usda.gov/project/?project=56315>

November 12, 2019

Brandon Houck
Attn: Diane Shirley
Heppner Ranger District
P.O. Box 7
Heppner, OR 97836

Re: West End Farm Bill CE

Dear Brandon:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the West End Farm Bill CE (West End) Categorical Exclusion (CE) pursuant to Section 603, Insect and Disease CE under the 2014 Farm Bill. AFRC strongly supports the use of the Farm Bill CE authority and is pleased to see the Heppner Ranger District (HRD) actively utilizing it. West End is a perfect example for use of this authority.

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 Heppner Ranger District (HRD), 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 61,051 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 supports the fundamental purpose of the West End project which is to remove insect and disease affected trees and to reduce stocking levels to decrease competition for moisture sunlight and nutrients. AFRC encourages the HRD to remove excess green trees that are competing for moisture and nutrients in addition to dead, dying or diseased trees. AFRC also

encourages the HRD to remove dead trees that are greater than 21 inches dbh if these trees have some commercial value that can be realized or if this dead material is significantly adding to the existing fuel load. We also encourage the HRD to aggressively treat as many acres as possible within the 3000 acre area covered by the West End CE.

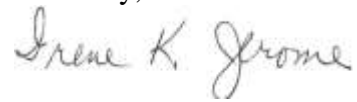
Wheeler County recently updated their Community Wildfire Protection Plan (CWPP) and the HRD National Forest System lands in the West End project ranked among the highest in the plan for risk of extreme wildfire moving off the Umatilla National Forest on to private lands. The West End project is both timely and very welcome for Wheeler County. Oregon Department of Forestry (ODF) will be strongly encouraged to secure grant monies to help private landowners in this area to reduce fuel loads on their lands as well in the spirit of the National Cohesive Wildfire strategy and shared stewardship. The revised Wheeler CWPP document will be publicly available within the next month.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. We understand that the Forest Service must take necessary precautions to manage 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 the environmental analysis and in the contracts (Ex. dry conditions during wet season). We would like to see the HRD shift their methods from protecting resources through firm prescriptive restrictions to methods that focus on descriptive end-results. There are a variety of operators that work in the HRD market area who possesses diverse sets of skills and equipment. Developing a NEPA document and contract that firmly describe how any given unit shall be logged may inherently limit the abilities of certain operators to create the best end result on the ground.

Carbon sequestration as it relates to climate change is a topic that often gets broadly analyzed in NEPA documents. The analysis that the Forest Service will likely be conducting through the ensuing environmental analysis will discuss forest health benefits, effects on carbon sequestration and storage potential and meeting the purpose and need all within the context of an economically viable timber sale. West End consists of a variety of treatments, including precommercial and commercial thinning, which may affect the treated stands ability to resist, respond, or be resilient to climate change in the project area. The direct, indirect, and cumulative effects of carbon sequestration and storage and its relationship to climate change in regard to this project must be viewed at much larger scales than the general project area because the scientific literature regarding these, only support analysis on larger scales. There is a large body of literature on management strategies that have the greatest carbon sequestration benefit. In general, actively managing the forest will produce a positive net increase in carbon sequestration thus a positive benefit to reducing anthropogenic effects on climate change (IPCC, 2007). AFRC urges you to analyze the type of treatments being proposed and determine through the literature how they will affect carbon sequestration potential through time.

I look forward to the next steps in the planning process on the West End project, which has the potential to provide significant ecological, social and ecological benefits to the local area and the region. Please feel free to contact me if I can assist you with determining the economic feasibility of silviculture treatments and logging system requirements.

Sincerely,

A handwritten signature in cursive script that reads "Irene K. Jerome". The ink is dark and the signature is fluid, with the first and last names being more prominent than the middle initial.

Irene Jerome

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