



March 16, 2021

Richard Periman
Mt Hood National Forest
16400 Champion Way
Sandy, OR 97055

In Reply To: Mt. Hood Wild and Scenic River Comprehensive River Management Plan

Dear Mr. Periman:

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 Mt Hood 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. Rural communities, such as the ones affected by the Great American Outdoors Act, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

Our members depend on a predictable, economical, and dependable supply of timber products from National Forest Service land to run their facilities and provide useful wood products to the American public. It is imperative that the Forest Service has the authority to effectively manage its forest land in a manner that fosters healthy and productive forests that are capable of withstanding high-intensity wildfire and insect and disease infestations. These forest conditions are important across the federal ownership, regardless of land allocation. The designation of these nine segments of river and stream

as “Wild and Scenic”, and the existing Land and Resource Management Plan (LRMP) direction that will soon apply to these segments and their associated corridors, will largely dictate whether the forest health outcomes important to our membership are likely to be realized.

Often, new land designations such as Wild and Scenic, National Recreation Area, or Inventoried Roadless Area do not strictly prohibit active management, including timber harvest. However, despite this, ambiguous management plan direction regarding desired outcomes and allowable activities has a tendency to inadvertently discourage active management. To ensure that the Forest Service has the support and guidance to conduct forest health treatments on these newly designated corridors where forest managers deem it necessary to meeting Forest objectives, we would like to recommend that existing LRMP direction applicable to Wild and Scenic Rivers as well as portions of this EA be modified to reflect modern forest management needs.

According to Table 5 on page 19 of the EA, many of the newly designated segments will be managed under the direction of Category B Management Area B1 Designated Wild, Scenic, and Recreational Rivers (Mt Hood National Forest LRMP, pg. four-211). This Management Area (MA) provides direction on timber management on page four-214, and states that “within wild river segments, regulated timber harvest shall be prohibited. Unregulated timber harvest and salvage activities may occur only for insect or disease control, fire, natural catastrophe, disasters, public safety or under specific conditions on valid mining claims.” The language here regarding unregulated timber harvest is unclear. For example, it is difficult to understand if timber harvest can be used as a tool to reduce fuels for fire resiliency or to manage density. **We recommend that the Forest Service consider amending this piece of LRMP direction to provide managers with a clear vision of what type of treatments are permissible and advisable in the W&S corridors to achieve key objectives.**

We recommend amending to read: “...Unregulated timber harvest and salvage *should* occur to reduce stand densities to mitigate risk of catastrophic wildfire and severe insect and disease infestation, address public safety hazards, and ensure adequate forest cover.” We believe it is particularly important to replace the word “may” with the word “should” to provide forest managers with the clear guidance that active management to achieve forest health objectives is not simply permitted, but desired on this land base to meet the values identified for the designated river segments.

We also recommend that the Forest Service consider amending the Desired Future Condition described on page four-209 of the LRMP to align with the ability to actively manage these corridors for the forest health objectives we outline above as well as to

achieve the values identified for the designated river and stream segments. This page identifies a desired future condition for wild segment corridor as an “unmodified environment.” This is also noted on page 82 of the Draft Comprehensive River Management Plan. Such language will likely be viewed as prohibitive of not only regulated timber harvest but also unregulated timber harvest. Such direction would not allow the Forest Service to actively manage forests to mitigate the risk of catastrophic wildfire or insect and disease infestations. The LRMP also only permits access to these wild corridors via “trail or water.” It is well documented that adequate road access is necessary to feasibly implement active forest management. **We urge the Forest Service to amend this language pertaining to 1.) unmodified environment; and 2.) access to allow certain active management that includes unregulated timber harvest to occur in an economically feasible manner in these wild corridors.**

AFRC is happy to be involved in the planning and decision-making process for the implementation of the Mt. Hood Wild and Scenic River Comprehensive River Management Plan. 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