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Title: Log Procurement Forester

Comments: August 29, 2019

Kathleen Minor

Umpqua National Forest

Tiller Ranger District

27812 Tiller Highway

Tiller, OR 97484

RE: Skilleen Integrated Resource Restoration Project EA

Dear Ms. Minor:

#### Introduction

On behalf of Scott Timber Co. (STC), thank you for providing the opportunity to comment on the Skilleen Integrated Resource Restoration Project. STC hopes that the comments we contribute provide insight on the important, yet dynamic issues surrounding the Umpqua National Forest and the resources therein.

STC is a wholly owned subsidiary of RLC industries that was founded in September of 1984. The main objectives for STC consist of procuring logs and fiber for our western mills on Timberlands in both Oregon and California. We accomplish this by monitoring log supply and quality within our mills, and by logistically managing inventory through contract timber, and log sales.

STC submits the following comments on the Proposed Actions:

#### Purpose and Need Indicators

The Purpose and Need Indicators put forth by the Forest Service within this EA are concerning to STC. The indicators denoting the "miles of roads decommissioned, roads removed within Riparian Reserves, and road access to recreation sites in Riparian Reserves reduced" are unreasonable indicators for meeting the overall goals of this project. These indicators are arbitrary, and should only be executed when evidence pertaining to resource damage is blatant, or if the cost to decommission a road outweighs the cost to store it for future use. Due to current volatile fire behavior, STC would rather see roads maintained then stored in a manner that is easily reversed (gates, rock traps) rather than decommissioned from future use. This is less expensive and saves funds for other necessary management.

#### Alternatives Considered but Eliminated from Detailed Analysis

Fire scars are prevalent throughout much of the proposed project area, and STC believes that better fuel breaks would help reduce the severity of future fires within this area (especially where fuel loading is prevalent). It is understandable how the Forest Service developed the conclusion that Alternative B would not meet the purpose and need of the project as correlates to the susceptibility of wildfire. Although, we believe the Forest Service

should reconsider Alternative B, in addition to the lower canopy cover limits if crowning proposes an issue, or if trees 20 feet from the road are anticipated to be felled during firefighting operations.

#### Proposed Action

After reviewing each alternative within the EA, STC believes that Alternative 3 would best address the project goals the Forest Service wants to achieve. Addressing sedimentation within this project area is crucial when it comes to preserving aquatic biota. By partially decommissioning roads, implementing footpaths, and by moving parking areas away from the river, STC foresees that the Forest Service will be closer to ascertaining their sedimentation goals within this area. The Forest Service should also consider implementing sedimentation traps in areas that are highly susceptible to erosion.

Active management on the Umpqua National Forest and adjacent National Forests is crucial for local economies and businesses. STC is a company that relies on the Forest Service for an economical supply of timber products in order to meet demands within the wood products industry. Given these factors, STC is pleased to see that the Forest Service wants to implement 5% to 10% gaps within the late Successional Reserve Thinning Prescription. Although STC would like to see that percentage rise, we understand the constraints that the Forest Service faces when it comes to implementing a vegetation management project. STC applauds the Forest Service and its valiant effort to improve forest health and aquatic habitat within the Umpqua National Forest. Vegetation management within the Tiller RD Matrix, Riparian Reserve, and Late-Successional Reserve will not only help reduce the effects of disturbances like sedimentation and fire, but will also provide needed timber products to facilities within the local area.

#### Concluding Remarks

Thank you for providing STC with the opportunity to review, and comment on the Skilleen Integrated Resource Restoration Project EA. STC believes that active management within the Umpqua National Forest will help increase the areas vigor, improve habitat for aquatic biota, and provide essential timber resources to local communities. STC looks forward to commenting on future projects and appreciates the opportunity to provide feedback.

Sincerely,

Jeremy Korn

Log Procurement Forester

Scott Timber Co.

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