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First name: Irene

Last name: Jerome

Organization: AFRC

Title: Eastside Consultant

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Paula Guenther, District Ranger Attn: Leslie Taylor

North Fork John Day Ranger District Umatilla National Forest

P.O. Box 158 Ukiah, OR 97880

Dear Ms. Guenther and Ms. Taylor:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments on the Willoughby Urban Interface Protection Project (Willoughby).

The 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 Umatilla 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 forest sector employs approximately 76,000 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 is glad to see the North Fork Ranger District proposing fuels reduction and vegetation management in urban interface areas east of Ukiah. AFRC recognizes that there would be many potential benefits for implementing this project and that "The purpose of this project is to reduce the fuel loadings within a quarter mile of identified values at risk (private inholdings or structures) to decrease flame lengths to less than four feet. Within one and a half mile of the identified values at risk the goal is to reduce the potential for crown fire and lofting firebrands into identified values at risk." Part of the "need" of this project should be to provide wood products to the local forest products industry to enhance local economies. Forest industry is your partner in implementation of this project and this should be recognized at the forefront. Part of the "need" of this project should be to provide wood products to the local forest products industry to enhance local economies. We would like the North Fork District and the Umatilla National Forest to recognize this importance by adding economic viability & support to the local infrastructure to the purpose and need of the Willoughby project. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on National Forest land, particularly those lands designated as General Forest, but also on lands with other designations. The Willoughby project is on the Umatilla outyear timber program in 2019 as producing 2 MMBF.

AFRC supports and encourages management on all lands that need treatments to restore forest health and resilience, and to reduce fuels and protect communities as well as likely producing useful timber products to our

membership. Our members depend on a predictable and economical supply of timber products off Umatilla National Forest land to run their businesses and to provide useful wood products to the American public. The treatments on the Willoughby project will likely provide short- term products for the local industry and we want to ensure that this provision is an important consideration for the decision maker as the project progresses. As we will discuss later in this letter the importance of our members[rsquo] ability to harvest and remove these timber products from the timber sales generated off this project is paramount.

The consideration of active management on every acre of appropriate land, regardless of its land allocation, is important to our membership as each year[rsquo]s timber sale program is a function of the treatment of aggregate forested stands across the landscape.

The timber products provided by the Forest Service are crucial to the health of our membership and local economy. Without the raw material sold by the Umatilla these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service lands. To be clear, we are advocating that you consider the economic viability of the project and make sure that it is designed in a way that makes sense for the market. This is not the same thing as maximizing economic value of the project.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills in this area are log size and species coupled with haul distance. Rather than provide very specific information in the NEPA specific equipment types, etc. it is much better to provide a description of the desired end results on the ground at project completion. Does the North Fork District anticipate that Willoughby will be an economically viable project? Or will it be implemented as an Integrated Resource Service Project?

AFRC questions whether the objectives of Willoughby can be met by leaving all trees greater than 21 inches at dbh, specifically white fir and spruce that may be decadent and diseased. These trees often create serious issues during wildfire events including unsafe conditions for firefighters and timber fallers.

AFRC supports implementing various fuels reduction and vegetation treatments in RHCAs as well as removing products that have commercial value. There are many different methods of removing materials from riparian areas that do not involve heavy equipment inside the riparian area itself.

AFRC supports prescribed burning activities but we remain concerned that this activity will be accomplished in a timely manner. How realistic is prescribed burning in this area?

AFRC does not support printing the design criteria in the body of the EA. Please incorporate this information by reference or provide it in the appendices.

AFRC encourages the North Fork District to consider making Willoughby an HFRA project.

Thank you for the opportunity to provide scoping/EA comments on the Willoughby project. I look forward to following the implementation of this project as it moves forward.

Sincerely,

Irene K. Jerome

AFRC Consultant

408 SE Hillcrest Rd

John Day, OR 97845