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First name: Corey

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Organization: American Forest Resource Council

Title: Oregon State Manager

Comments: Dear Mr. Wishart,

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 Willamette 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's forest sector employs approximately 61,000 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 pleased to see the Middle Fork Ranger District proposing vegetation management on lands designated as Matrix and Riparian Reserve Land Use Allocations that will likely provide useful timber products to our membership. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. We are also glad to see that the RD has recognized the importance of supporting local economies with forest products off Forest Service land by including the provision of that support in the Purpose & Need for the Station Butte project.

AFRC believes that the provision of useful raw material off National Forest Service land is an integral component of the agency's multiple-use mission. In recent years, many Forest Service Districts have opted to omit the provision of useful raw material from the purpose & need statements of vegetation management projects. AFRC has warned against this practice as it marginalizes the appropriateness of this provision to the agency's mission. Most all Forest Service vegetation management projects achieve an array of positive outcomes. One of these positive outcomes is a sustainable supply of wood products, and we thank the RD for recognizing this in the Station Butte project.

RIPARIAN RESERVES

We are pleased to see the RD incorporate commercial thinning in some Riparian Reserves within the Station Butte project. Often, stands proposed for thinning treatment in the uplands have the same undesired forest conditions (overly dense and uniform stands) in riparian areas. The forest health benefits that you expect to attain through upland thinning treatments can also be achieved in riparian areas with similar active management prescriptions. Allowing some commercial harvest will not only produce usable forest products, but it will also improve structure and promote greater resiliency in the Riparian Reserves.

ROAD DECOMMISSIONING

We are pleased to see that only those temporary roads needed to facilitate this project's proposed actions will be considered for decommissioning in the Station Butte EA. The land base covered in the Station Butte project area is to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

QUARRY USE

We are pleased to see the RD incorporate usage of the McKenzie and Point Ten rock quarries for the Station Butte Project. Maintaining a nearby rock source will help the economic viability of future timber sales resulting from the project. Similarly, we are also pleased to see the RD list mitigations necessary to reduce or eliminate weed spread as a result of hauling and applying rock. AFRC membership is aligned with the Forest Service's goal of minimizing the spread of noxious weeds resulting from harvest activities on federal land. It is in the best interest of the agency and contractors to make sure that forestry operations do not contribute to this growing issue on federal lands.

WET SEASON OPERATIONS

We appreciate your language in PDF Aquatics 27 (EA Page 90), which permits operators to haul during the wet season when conditions are unseasonably dry, or along roads which are properly designed to limit sedimentation during wet conditions. Constructing forest roads is essential if active management is desired, and we are glad that the RD is proposing the roads that are needed to access and treat as much of the project area as possible in an economically feasible way. Proper road design and layout should pose little to no negative impacts on water quality or slope stability.

Likewise, we appreciate your language in PDF Soils 1 (EA pg. 91) which prohibits groundbased operations [during wet conditions], without imposing strict seasonal restrictions. Consistent and steady operation time throughout the year is important for our members not only to supply a steady source of timber for their mills, but also to keep their employees working. These two values are intangible and hard to quantify as dollar figures in a graph or table, but they are important factors to consider. The ability to yard and haul timber in the winter months will often make the difference between a sale selling and not.

HELICOPTER YARDING

We are disappointed to see the MRD propose 490 acres of helicopter logging in this analysis. As the MRD is surely aware, helicopter yarding is extremely expensive, especially in thinning units with generally small diameter material. This method of yarding should be used as a last resort when conventional yarding systems are infeasible. For this reason, we urge the MRD to take a hard look at accessing these acres with temporary roads to facilitate conventional yarding systems before resorting to helicopter.

It is difficult for us to assess whether the proposed helicopter yarding is appropriate for the site without knowing exactly which units will require the yarding method as no map of proposed harvest methods is included in the Draft EA. We urge the RD to examine those proposed helicopter-only units in more detail and to perform an economic analysis comparing the cost of helicopter yarding with the cost of building temporary roads to facilitate conventional yarding methods. Furthermore, we urge the RD to include in their final analysis a detailed description of harvest methods for each unit proposed for harvest in the Station Butte EA.

For those sales in which helicopter yarding is required, it will be critical for purchasers to be able to operate in the winter months. Securing helicopters in the summer months is extremely difficult for our membership, primarily due to competing needs for fire suppression. Ensuring that roads that access helicopter units are rocked to permit wet season hauling is critical to the successful implementation of those units.

TETHERED ASSIST (TA) LOGGING

We appreciate your allowance for tethered assist (TA) ground-based equipment to occur on slopes over 60% in sales resulting from this analysis.

We are concerned, however, with your requirement in PDF Aquatics 47 (EA Page 82) and Soils 8 (EA Page 94) which requires operators to utilize TA only where there is a slash mat greater than 8 inches. In some instances, a slash mat may not be available, particularly where operators elect to utilize whole-tree yarding, a standard practice in Western Oregon.

Additionally, we would like some clarity on your language in PDF Soils 5 (EA Page 85) which establishes an upper slope limit of 45% for pre-bunching. While the description of the PDF notes a restriction on [“untethered ground-based equipment”] from operating on slopes above 30%, the pre-bunching limitation seems to extend to all ground-based operations, including TA. For clarification: does this pre-bunching limit apply to tethered equipment as well? If so, the MRD may be restricting TA such that its use may become infeasible for local operators. TA logging can only be economically comparable to conventional skyline yarding when feller bunchers are permitted to pre-bunch logs prior to yarding; otherwise, operators will find limited utility in using TA for sales resulting from this analysis. We recommend that the MRD include language in this PDF which specifies that pre-bunching is limited to slopes <45% except in units identified for TA logging.

AFRC is happy to be involved in the planning, Environmental Assessment, and decisionmaking process for the Station Butte project. Should you have any questions regarding the above comments.