



June 28, 2019

Wade McMaster, District Ranger, c/o Matt Timchak
Rogue River-Siskiyou National Forest
Gold Beach Ranger District
29279 Ellensburg Avenue
Gold Beach, OR 97444

In Reply To: The Shasta Agness Landscape Restoration Project Draft Environmental Impact Statement

Dear Mr. McMaster,

Introduction

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Shasta Agness Project.

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 Gold Beach Ranger District (GBRD), 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.

Purpose and Need

AFRC is glad to see the GBRD proposing vegetation management on their Late Successional Reserve (LSR) lands 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. This supply is important for present day needs but also important for needs in the future. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments effect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times regarding the long-term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. While the treatments on the Shasta Agness project are unlikely to directly address this long-term sustainability concern, they 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' ability to harvest and remove these timber products from the timber sales generated off this project is paramount. We are concerned the FS did not identify economic feasibility as a key issue for the 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 Forest Service land, even those lands designated as LSR. We encourage the Gold Beach District to review any recent LSR thinning EA completed on the Siuslaw National Forest that identifies such a need and incorporates it into the projects objectives. The Shasta Agness DEIS went into great depth regarding recreation's role in socioeconomics, and we would like the project to consider the wood products industry's role in a similar fashion. As the Forest Service surely knows, the "restoration" treatments that are desired on these public lands cannot be implemented without a healthy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed. Page 73 identifies "Effects from changes to recreational opportunities and access" as Key Issue number 12. AFRC commented to the scoping document for the Shasta Agness Project expressing concern that the timber industry was not thought of as an important part of the community like recreation. The DEIS solidifies this view by not including any issues related to the timber industry, sustainable forest products, or local jobs related to workers in the woods. Issues related to these topics could have easily been included such as:

- 1) Effects to the socioeconomics of the local communities
- 2) Economic viability
- 3) Effects to local wood markets

Socio-Economic Resources are discussed starting on page 517 of the DEIS. Economic Viability is discussed here, but the need for the FS to have a vibrant timber industry is not included

in this section. We would like to see the acknowledgement that the wonderful restoration work proposed in this Project would not be possible without a thriving timber marketplace and labor sector.

Action Alternatives

General

AFRC has long been advocating for the Forest Service to prescribe vegetation management treatments based primarily on stand characteristics and to avoid using arbitrary parameters to drive management decisions. Therefore, it is disappointing to see several prescriptive thresholds identified in the Shasta Agness Project. Table 83, on pages 261-263, summarizes and compares the action alternatives for the Project. It identifies age limitations, diameter limitations and canopy cover limitations. We appreciate the allowance for reducing canopy covers below 40% in approximately 10% of oak, pine, and plantation stands although as practicing foresters who have visited many of the candidate stands in the Shasta Agness planning area, AFRC knows that all of these limits will conflict with the Districts ability to achieve the stated purpose & need of the project. For example, the level of encroaching conifer needed to be removed in order to properly restore sugar pine and oak savannah stands will vary depending on the stand. The Forest Service describes the outcomes desired in each forest type in the Desired Conditions section of the DEIS, but due to these restrictions the Project does not allow the field staff professionals the discretion to develop real-world prescriptions.

“The purpose of this Project is landscape restoration” (DEIS, pg. 50). AFRC is concerned that the GBRD is unlikely to meet its purpose due to restraints from diameter limits in the project. AFRC understands the District went through the rigorous process of amending the Late Successional Reserve Assessment to better meet the needs of the Project Area, unfortunately it may not have been enough to meet the desired conditions of the Project. Figure 1 shows how many sensitive oaks will not be released due to Douglas-fir trees exceeding the diameter limit for release of oak trees. The diameter limit of 28 inches for radial release of oaks or pines (Alt. 1 & 2) will not allow the oak in Figure 1 to be released. In addition, the diameter limit of 26 inches for general density thinning area (Alt. 1 & 2) drives the prescription in many of the oak stands, leaving more density on the landscape than described in the desired condition on pages 54-55. Some of these larger trees should be cut because they are unhealthy as well. The diameter limits restrict on the ground foresters from being able to make good decisions on the ground about how to increase the health and vigor of the stands. AFRC is having a hard time understanding why the specific diameters were chosen as limits in the first place. Why not use 30 inches instead of 28? **Please clarify how these numbers were developed.** According to page 77 of the DEIS, “[v]ariable density and radial release density thinning would occur in oak, pine, plantation, and riparian reserve stands in all identified restoration units **across all diameter classes**”. AFRC

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appreciates the use of this language and we hope to be involved with monitoring of this prescription to see its attainment of the desired end results. Gap creation will occur in the plantation and pine units. Key issue 6 states “Effects from and efficacy of a range of created gap size”. AFRC would have liked to see gaps created throughout the panning area in each stand type. AFRC does not agree that gaps no larger than $\frac{3}{4}$ of an acre should be created in stands **capable** of becoming NRF. Horizontal complexity within stands and landscapes is important to support biodiversity and ecologic functions. The first three *Alternatives, or Alternative Components Considered but Eliminated from Detailed Study* on pages 252-253 were suggested by AFRC. They were all preliminarily considered, but then eliminated. The first one, “Implement a no DBH cut limit instead of a 40% canopy cover limit”, was eliminated due to concerns with conformance to the *LRMP* and *NWFP*. AFRC does not agree with this explanation. There are diameter limits in the LSRA, but we believe the amendment for the diameter limits as they are proposed in the DEIS have shown to not be enough. We believe the FS should have come to the Regional Ecosystem Office (REO) describing the expected prescriptions and pleaded for no diameter limits. AFRC does not believe every large tree needs to be cut in the Project Area, but the diameter limits should not restrict the District from meeting its Purpose and Need of this Project. The second and third alternative components about gaps have explanations that include a lot of assumptions/presumptions about what the REO would or would not approve. AFRC believes the FS should never make these assumptions and instead propose what is necessary. The worst thing they could say is no and then you have the ability to negotiate from there. **Please, in the future, take this tactic as opposed to one similar to what was employed for the Shasta Agness Project.** AFRC does **support** the use of project specific plan amendments



Figure 1: Oak that will not be released due to the diameter of the Douglas-fir trees overtopping it exceeding the diameter limit for allowable cut trees for oak release. The yellow circle shows the size of the trees in comparison to an adult male.

to the LRMP and NWFP as well as amendments to the LSRA. The tool of amending plans to better treat the landscape as it sits today within the current stand conditions and with modern tools, is paramount.

Alternative 1

AFRC believes Alternative 1 will most fully obtain the purpose and need of the Shasta Agness Project. Because of this, no portions of the No Action Alternative, Alternative 2 or Alternative 3 should be incorporated into the final decision.

This Alternative proposes management across a mere 7% of the Project Area. This percentage is typical of many FS vegetation management projects and although AFRC would like to see the agency treat a higher proportion of the landscape, we understand the multiple directives and land management restrictions in place that make doing so difficult. Given the relatively small scale at which this project is proposed to be implemented on, we urge the District to look for ways to maximize treatment where it is proposed and to avoid deferring units or setting aside portions of units for what is often referred to as “skips” (**please consider the fact that 93% of the project area will essentially be “skipped”**). Discounting all non-commercial and POC treatments (but including stand 285 also analyzed under the CHFT Project), only about 4% (3,770 acres) of the Project Area will have merchantable timber volume contributing to the estimated 24.037 MMBf of volume removed from the Project. This acreage is likely to decrease as timber sale layout occurs as archeologic surveys, unknown riparian areas, and other such areas are found that will need to be buffered out of the treatment blocks. Additionally, all of the Action Alternatives include skips. There is no specification however as to what the minimum or maximum percentage of stands skips will occur in. **Please clarify where skips are likely to occur/are proposed, in what stand types, why, and how they will be identified.** AFRC would like there not to be a minimum percentage for skips, because not all stands need to have skips. Many stands need density management throughout their matrixes. AFRC believes if there are skips proposed, there should also be gaps proposed to create balance and heterogeneity.

According to the DEIS on page 77, “[i]n Alternative 1, the upper diameter limits were determined by stand conditions and needs”, but AFRC has stated earlier in this letter that the diameter limits will not accomplish the desired condition and need for the Project. AFRC supports the general methods outlined in the DEIS to treat the stands within the Shasta Agness Project Area. Decreasing densities in any standby thinning throughout the diameter classes (instead of solely thinning from below), radial releasing around oaks and pines, gap creation, and generally creating healthier and more resilient landscapes is essential.

On page 131 the DEIS states, “Target canopy covers would range from 0-20% in **open oak savannahs**, 20-40% in **oak woodlands with high oak composition**, 40-60% in **oak woodlands**

with lower oak composition, and >60% in some areas with few oaks.” This language is concerning to AFRC because we do not believe the *current* oak component should drive target canopy cover. If stands should be oak, then promote the establishment of the oak and remove most of the Douglas-fir. By utilizing this language, the GBRD shows that it is planning to continue prompting Douglas-fir stands where oak savannah and woodlands should be. Approximately 1,702 acres (oak and pine/serpentine units) are prescribed to allow 60% or greater canopy cover retention. This is almost 46% of the total commercial treatment acres. The plantation thinning will not reduce canopy cover below 40%. AFRC does not understand why these limits were determined. If habitat needs to be maintained due to active owls and habitat limitations, then clearly notify the public as such. According to the BA on page 42, “The two owl sites with potential adverse effects are summarized as follows:

- Spotted owl site #271 – Nesting at this site was documented in 1990, 1991 and 1992. The last year with pair status was in 1994. Surveys have not occurred since 1994.

- Spotted owl site #288 - Nesting has not been documented since the site was established in 1990. The last known pair was documented in 2001; the last detection occurred in 2002. Surveys were not conducted at this site between 2003 and 2015. Surveys at the nest patch were conducted in 2016 and 2017.

Survey History

Surveys were completed between 2008 and 2017 in some portions of the Shasta Agness action area. Call stations were positioned to survey NRF habitat within known spotted owl sites and outside of known sites where activities might occur. A portion of the NRF was surveyed in 13 of the 25 known spotted owl sites in the action area. Some, but not all, were in compliance with established protocols. The results of those surveys are summarized as follows.

In 2009, male and female pair responses were heard within the home ranges of sites #389 and #390 (overlapping home ranges) but closest to the nest patch of site #390 (approximately 1 mile). A female audio was heard 0.5 mile away from the pair response and outside any known home ranges.

In 2013 male and female audio and visual responses were heard in the same general areas as the 2009 responses. These responses occurred in home ranges of sites #260, #275, #389, and #390 (overlapping home ranges).

In 2016, site visits were conducted for spotted owl sites #7, #288, and #387. A single spotted owl was observed in site #7 on one visit. Because visits were not to protocol, they cannot establish non-occupancy.

In 2017, site visits were conducted at the same sites as in 2016. A barred owl was heard in site #7 where the spotted owl was observed in 2016. Pair status was established at site #387, but nesting is unknown. Because visits are not to protocol, they cannot establish non-occupancy.”

AFRC understands that NSO surveys are not required to be completed to protocol, but the GBRD has now limited itself by not allowing nests to be considered as non-occupied. The BA identifies site #271 and site #288 as potentially having adverse effects from treatment and Appendix C of the BA shows both of these sites have proposed stands in their core areas. Owls have not been detected in site #271 since 1994 while site #288 has not had detections since 2002. Why are they still considered active? AFRC is also still having a hard time understanding why all of the treatments in the Project except for the POC treatments have canopy cover restrictions if there are few if any active owls in the Project Area.

Alternative 2 & 3

The other action alternatives do less than Alternative 1 and therefore do not meet the Purpose and Need of the project to its fullest potential given Alternative 1. AFRC believes alternatives should be judged by how well they meet the Purpose and Need. An alternative that treats 350 acres vs a project that treats 300 would better meet the Purpose and Need therefore should be chosen.

Roads

Roads are extremely important for not only recreation opportunities but silvicultural treatments, ingress and egress for firefighting. Page 115 of the DEIS notes that 33.67 miles of were analyzed in the Project. Alternative 1 proposes 6.26 miles of road decommissioning. AFRC believes fixing roads can improve ecological conditions, but we believe once they have been fixed, they should be left in storage as opposed to decommissioning and fully obliterating them. Removing them from the road system is not a problem but removing the prism and ripping the roadbed should not be the answer. By allowing at least foot traffic, some ingress and egress for firefighting will remain intact. **Please clarify what actions are likely to be taken to decommission these 6.26 miles of roads.**

Riparian Reserve Treatment

It has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. AFRC included some of these studies in our scoping comments and are hereby incorporated by reference. Removal of suppressed trees has an insignificant short-term effect on down wood, and

ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. The ACS describes the need for treatments that meet the need of multiple habitat types and we encourage the Gold Beach District to look for ways to incorporate treatments that meet those needs. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that the ACS mandates should be considered. The Shasta Agness Project does not include gap cuts in the riparian reserves as AFRC suggests here and in our scoping comments. AFRC is however thankful that the DEIS includes 495 acres of commercial treatment in the riparian reserve. The larger proportion (1,087 acres) of riparian reserve treatment comes in the form of non-commercial, cut/leave treatments. Skip will be utilized in the riparian reserves as well. The DEIS states on page 154, “[s]kip would also be focused in riparian areas with[in] the project area, so if no oaks or pines exist near the riparian area, it is likely that an even lower p[ro]portion of the riparian areas would be treated during implementation.” This is frustrating to AFRC because we provided many studies in our scoping comments that indicate the need to treat in riparian areas whatever the species composition. Dense stands need to be thinned, wherever they exist.

Adaptive Management

We would like to see adaptive management used to increase actions on the ground when objectives have not been met. One way to utilize monitoring results and get real meaningful outcomes is through designation by prescription (DxP) to designate timber for cutting in a timber sale contract. If implemented well utilizing well-designed sale administration sampling, DxP can produce useful implementation monitoring data. This method ensures treatments are being implemented as prescribed and provides an adaptive approach. Forests that have utilized this method of designation have commented that marking with paint does not add protection from the lack of accountability. They have also concluded that appropriate implementation of DxP, with thoughtful design of provisions, layout, and additional sale administration, increases accountability for both parties with at least some fiscal savings in paint, personnel costs, and/or monitoring efforts while addressing existing & inherent challenges and deepening relationships with our primary implementation partners. There needs to be enough flexibility in the document to allow additional trees to be taken out to meet objectives if that is what the monitoring data shows needs to happen. As AFRC stated above, we do not think the DEIS as written will allow the objectives of the Shasta Agness Project to be met fully. Successful adaptive management projects allow the pendulum to swing in whichever direction it needs to in order to appropriately meet the objectives on the landscape. It is understandable that not every acre has been surveyed for cruised to determine what exactly it needs. Because of this, there needs to be the allowance in the NEPA document to do more if necessary.

Red Tree Vole

AFRC is in support of using the high-priority site plan for Red Tree Vole (RTV). We recommend transparency with this process and relating it back to the High-Priority Site Management Recommendations from 2016. We are in favor of this designation strategy because RTVs are not threatened or endangered, and in fact, survey history since the inception of the Northwest Forest plan indicates that they are actually very abundant and often due to their survey and manage listing in the NWFP will restrict any management from occurring in landscapes that desperately need it.

AFRC is confused as to why “Pechman exemption stands” were proposed as high-priority sites for the RTV as alluded to in the DEIS on page 158, “Alternative 1 has the greatest number of thinning and prescribed fire restoration acres that would be treated within the proposed high-priority site designation area under the Pechman exemption.” **If this is not the case and Pechman exemption stands were not qualified as high-priority sites, please clarify this point in the DEIS.**

Economics

The timber products provided by the FS are crucial to the health of our membership and local economy. Without the raw material sold by the FS, 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 FS 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. Three mills have closed their doors permanently in the last three years. Two mills closed in the last 3 months alone. Without local manufacturers, the necessary work in the woods could never get accomplished. 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 FS forestland.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the FS 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 in FS NEPA documents and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We are glad to see that the FS is shifting their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results. There are a variety of operators that work in the GBRD market area with a variety of skills and equipment. Developing

a Final EIS and subsequent contracts that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. AFRC is glad to see the FS allowing haul outside of the commercial use period during dry conditions.

For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposed area is planned for cable harvest, there are opportunities to use certain ground equipment such as feller bunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and feller bunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand, and provide a more even distribution of woody debris following harvest.

AFRC is grateful the FS is allowing mechanized equipment on slopes up to 45% on a case-by-case basis. The acknowledgement of new technologies is important for forest management to continue improving and innovating. See [here](#) for additional information about tethered logging.

Sound disturbance is analyzed in the DEIS on page 102. Hauling on any road should be considered transient noise and is considered as such on the Siuslaw NF and NWO BLM District.

AFRC has reviewed the Logging Report and Economic Analysis completed April 2017 for the Shasta Agness Project. The analysis notes that bid rates for Douglas-fir have ranged from \$60 per Mbf to \$282 per Mbf. The analysis then goes on to say, “The average log prices from 2014-2016 pond value for Douglas-fir is approximately \$556 per Mbf (Oregon Department of Forestry, 2017)”. AFRC is uncertain what this Oregon Department of Forestry (ODF) number considers. AFRC believes the GBRD should only be concerned with what local bidders are willing to pay for wood. If purchasers have the capacity to bid higher for stumpage in Tillamook County that does not mean local purchasers in Curry, Jackson, Josephine, Douglas, or Coos County will be able to purchase wood for the same price. This has to do with local workforce, market and company dynamics, road system, quality of wood, operating restrictions, type of contract (ODF, private, FS, or BLM), and much more. AFRC does appreciate the admitted difference in scaling rules utilized by western Oregon purchasers as west-side long log Scribner versus the FS’s east-side short log Scribner rules. This acknowledgement is critical when determining true economic viability. According to Table 9, the profit margin of this project under Alternative 2 is approximately 7.23%. This is a low profit margin and does not allow much flexibility in the market. Additionally, as mentioned above, this is utilizing the east-side short log Scribner rule for volume estimation. When utilizing the west-side long log Scribner rule

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(as industry does), volume estimates typically decrease by approximately 30%. With this considered, the profit margin is drastically lower. Instead of the estimated 24.037 MMbf produced from the project, the volume estimate decreases to approximately 16.8259 MMbf. There are 28 units that are estimated to be logged at a deficit, resulting in net negative revenue according to Table 9. Moreover, AFRC believes Table 3 on page 10-11 is fairly accurate except that skyline logging can exceed \$300 per Mbf in the zone. AFRC understands that these are the numbers the GBRD had to work with and appreciates the District for even taking the time to analyze the economic feasibility. As shown in Table 7 on page 15 of the document, present value financial revenue, Economic – present net value, and the benefit to cost ratio is greatest for Alternative 2. The GBRD does a fair job explaining why this outcome occurred but does not clarify why Table 7 utilizes a “benefit to cost ratio” versus a “revenue to cost ratio”. The benefits and how they were weighed into the benefit cost ratio have been described and AFRC imagines the benefit of the wood being brought to market from Alternative 1 would move this alternative’s benefit to cost ratio above Alternative 2’s if this metric was utilized. Generally, the benefit to the local socioeconomics from the increased volume of Alternative 1 versus the other Alternatives is not mentioned at all in the Logging Report and Economic Analysis document at all.

AFRC is happy to be involved in the Final EIS and decision making process for the Shasta Agness EIS. Should you have any questions regarding the above comments, please contact AFRC at 541-517-8573 or aastor@amforest.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amanda Astor', with a stylized, looping flourish at the end.

Amanda Astor
Southwestern Oregon Field Forester
American Forest Resource Council