



October 26, 2018

Scott Hicks
Bureau of Land Management
Grants Pass Field Office
2164 NE Spalding Avenue
Grants Pass, OR 97526

In Reply to: Bear Creek Scoping

Dear Mr. Hicks:

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 Grants Pass Resource Area, 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 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 has been advocating for sustainable timber management on O&C Lands for well over a decade. Our membership depends on a BLM timber program that is designed to sustain itself in perpetuity into the future. We have expressed our concerns with how the past management paradigm under the Northwest Forest Plan of exclusive thinning impacted the BLM's ability to achieve this sustainability. When that plan was conceived in 1994, the BLM assured the public that the timber resources on O&C Lands would be managed based on the principles of sustained yield. This assurance was based on a carefully crafted harvest plan that included both regeneration and thinning treatments

directed by a detailed modeling effort. Those models, and particularly the regeneration harvest, were largely ignored during the 20 years following completion of the plan—regeneration harvest was deferred in favor of a management scheme based solely on thinning.

The BLM recognized this fact in a 2012 RMP Evaluation Report on the implementation of what then was their current Resource Management Plan (RMP). Among other findings, this report led the BLM to the following two realizations:

- The determination of the ASQ is based upon an assumed; mix, intensity and cycle of regeneration and thinning harvest. Adherence to the principles of sustained yield, at the declared ASQ harvest level, is based on implementation of these assumptions.
- Accelerated rates of thinning without replenishment of younger forest stands through regeneration harvest means that opportunities for thinning will eventually be exhausted. The current approach to a forest management regime that deviates so considerably from the RMP assumptions used in determination of the ASQ is **not sustainable** at the declared ASQ level.

A similar modeling effort was completed again for the 2016 RMP's, published by the BLM last summer. Once again, the BLM assured that their timber resources would be managed based on the principles of sustained yield as directed by the O&C Act, and this assurance was once again supported by a carefully crafted set of models that included a combination of regeneration harvest and thinning. AFRC wants to ensure that the implementation failures of the Northwest Forest Plan validated in the 2012 RMP Evaluation Report are not replicated under the current RMP. A failure to implement would be characterized by the BLM ignoring the sustained yield models and proposing treatments in conflict with those models.

The 2016 Western Oregon BLM Resource Management Plans state that O&C lands must be managed “in conformity with the principles of sustained yield”. These sustained yield levels, and the subsequent Allowable Sale Quantities (ASQ), were calculated through models that indicated what level of regeneration harvest and what level of thinning would occur on each sustained yield unit by age-class. Adhering to what these models predicted is essentially the only way that the BLM can know and defend that they are managing their lands “in conformity with the principles of sustained yield”. We urge the Grants Pass Resource Area to recognize these models in the ensuing Bear Creek NEPA document in order to justify and defend the actions being proposed. Below is a table compiled from BLM source databases used in the modeling for the Proposed Resource Management Plan (PRMP) and we urge the Grants Pass Resource Area to consider including it in the Bear Creek NEPA document.

Grants Pass

HMP Desc	First Decade	
	Age Grp 2013	Selection
Uneven Aged	1) 0-30	539
	2) 40-70	1,333
	3) 80-110	2,060
	4) 120-150	2,094
	5) 160-190	2,233
	6) 200+	3,372
Total Uneven Aged		11,631

The concept of uneven-aged management in the 2016 RMP is based on the implementation of group selection harvests and thinning. It is through these group selections that multiple aged cohorts will develop, thus creating an uneven-aged stand. The RMP provides parameters from which to base silvicultural prescriptions in the UTA including the group selections. Page 68 of the RMP directs group selections to be *up to 4 acres in size* and comprising *up to 30% of the stand area*. In the context of group selections, the RMP also directs that *at least 10% of the stand area be left as skips*. It's unfortunate that the RMP created a "maximum" parameter for openings and a "minimum" parameter for skips. When developing prescriptions in the UTA based on these parameters we would ask the BLM to consider their entire land base in proper proportion. The BLM has 77% of the westside lands of the Southwestern Oregon RMP in some type of reserve land allocation where sustainable timber production is not permitted; that adds up to 822,235 acres. One way of looking at this breakdown is that 822,235 acres are in "skips". The remaining 23% is in lands designated for either even-aged timber management or uneven aged timber management. In light of these disproportionate numbers, we urge the Grants Pass Resource Area to develop an alternative that creates the minimum amount of "skips" (10%) and the maximum amount of group selections (30%) in their uneven aged treatment units.

The 2016 RMP also provides a range of desired Residual Density (RD) for UTA treatment acres. This range is 20-45. We would like the BLM to propose treatments that treat UTA stands to the lowest RD allowed by the RMP. The Medford District as a whole has had difficulty achieving its declared ASQ and its assigned targets over the past several years. **Until the District can get on track of achieving both its RMP mandates and agency direction, there is no reason to be treating proposed stands to a lesser extent than what is allowed.**

Management direction and land use allocations in the 2016 NWO ROD/RMP are intended to constitute the BLM contributions to the recovery of the northern spotted owl. The ROD explicitly describes how this direction does so on pages 22-24. In summary, the ROD describes this contribution via: **a.) maintenance of a network of large blocks**

of forest to be managed for late-successional forests; b.) maintenance of older and more structurally-complex multi-layered conifer forests; c.) timber harvest in the HLB consistent with the concepts of Ecological Forestry, and d.) mitigation of the effects of the barred owl by avoiding the incidental take of NSO's until implementation of a barred owl management program. In other words, the fact that the BLM placed the vast majority of O&C Lands into reserves including nearly all of the older stands, along with "lighter-touch" silvicultural prescriptions in the HLB, should allow for implementation of sustained-yield timber management on remaining O&C Lands in the HLB unencumbered by NSO concerns. Incidental take avoidance should be the only reason why treatments in the HLB get deferred for NSO considerations. **AFRC would like the Grants Pass Resource Area to explicitly describe in the ensuing NEPA document, if and why stands identified for treatment in the scoping document are deferred from treatment.** This includes stands deferred due to incidental take concerns, where we would appreciate an account of how and why treatment on those stands would result in take.

AFRC urges the BLM is considering proactive management in riparian reserves. Typically, the overstocked and uniform stand characteristics that exist in the uplands also exist in the riparian areas. 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. Removal of small diameter 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 BLM to focus their riparian reserve treatments on a variety of native habitats. 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 RMP mandates should be considered.

Ultimately, we would like the BLM to broaden their Riparian Reserve treatment areas to achieve multiple objectives in the future. Most of the land adjacent to and over intermittent streams in the project area resembles a dense and uniform stand of primarily Douglas-fir. Implementation of no cut buffers on certain streams will inhibit the achievement of important in stream components such as large wood. One of the main benefits of thinning at this stage of seral development is the accelerated attainment of large trees to provide large in stream wood. It has been documented by many that most of the wood that naturally recruits to streams comes from within the first 65 feet of the stream channel (Murphy and Koski, 1989; McDade et al. 1990. Johnson et al. 2011). So if this is where the LWD is coming from then thinning in this region would likely accelerate its creation. We encourage the BLM to design riparian thinning treatments on this project in ways that foster positive changes to large wood supplies that would result in measurable changes. One way to accomplish this is to reduce the no-cut buffers. It has also been documented that vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment (Rashin et al. 2006). Partial cutting down to one or two conifers from intermittent and perennial stream channels would accelerate the recruitment of LWD with minimal impacts to

sedimentation and stream temperature. We would like the BLM to consider these trade-offs closely in the planning for this project to improve riparian conditions on the maximum amount of these reserves.

We would also like the BLM to consider including some of the following pieces of scientific research into their analysis. Much controversy surrounding any type of thinning in riparian reserves has surfaced, and we think the following information would be useful in justifying the kinds of beneficial treatments the BLM implements.

Stream temperature

Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management*, 270, 302-313.

Key points of the Janisch paper include:

- The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature.
- Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.

Riparian reserve gaps

Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old-growth versus early-mature riparian forests in western Oregon. *Aquatic Sciences* 75:547-558.

Key points of the Warren paper include:

- Canopy gaps were particularly important in creating variable light within and between reaches.
- Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests.

(1) Small Functional Wood

Nearly all wood that falls into stream channels has the capacity to influence habitat and aquatic communities (Dolloff and Warren, 2003). Therefore, smaller woody material that enters stream channels is important to overall channel function because it can store sediment and organic material, contribute nutrients, and provide temporary pool habitat and slow-water refugia. It is important to note, however, that pools formed by smaller wood generally are not as deep or complex as those formed by large wood. In addition, small wood does not persist for long periods of time because it deteriorates quickly and is more likely to be flushed from the system (Naiman *et al.*, 2002, Keim *et al.*, 2002).

(2)

In smaller streams adjacent to previously harvested stands, field surveys (McEnroe, 2010) indicated that relatively large amounts of existing (in-stream) and potential (standing) small functional wood are present. Field surveys also indicate that the vast majority of the down wood in these areas originated from within 50 feet of the stream

channel. This is consistent with findings by Minor (1997), who found that in second-growth coniferous riparian forests, 70-84 percent of the total in-stream wood was recruited from within 15 meters (49 feet) of the channel. In addition, McDade *et al.* (1990) and Welty *et al.* (2002) found that 80 percent and 90 percent, respectively, of the wood loading occurred within 20 meters (66 feet) of the stream channel in coniferous forests.

Rashin, E., C. Clishe, A. Loch and J. Bell. 2006. Effectiveness of timber harvest practices for controlling sediment related water quality impacts. Journal of the American Water Resources Association. Paper No. 01162

Naiman, R.J., E.V. Balian, K. K. Bartz, R. E. Bilby, and J. J. Latterell. 2002. Dead wood dynamics in stream ecosystems. USDA/Forest Service PSW-General Technical Report-181

McDade, M. H. Swanson, F. J.; McKee, W. A.; Franklin, J. F.; Van Sickle, J. 1990. **Source distances for coarse woody debris entering small streams in western Oregon and Washington.** Canadian Journal of Forest Research 20: 326-330.

Dolloff, C.A., and M.L. Warren, Jr. 2003. Fish Relationships with Wood in Small Streams. Pages 179-194 in S. V. Gregory, K. L. Boyer, and A. M. Gurnell, Editors. The Ecology and Management of Wood in World Rivers. American Fisheries Society, Symposium 37, Bethesda, Maryland.

Minor, K. P. 1997. Estimating large woody debris recruitment from adjacent riparian areas. Master's thesis, Oregon State University

Welty, J. W., T. Beechie, K. Sullivan, D. M. Hyink, R. E. Bilby, C. Andrus, and G. Pess. 2002. Riparian Aquatic Interaction Simulator (RAIS): a model of riparian forest dynamics for the generation of large woody debris and shade. Forest Ecology and Management 162:299-318

Keim, R.F., A.E. Skaugset, and D.S. Bateman. 2002. Physical aquatic habitat II, pools and cover affected by large woody debris in three western Oregon streams. North American Journal of Fisheries Management 22:151-164

The timber products provided by the BLM are crucial to the health of our membership. Without the raw material sold by the BLM 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 BLM 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 BLM 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 BLM must take necessary precautions to protect 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 BLM EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the BLM to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Northwest BLM market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. 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. To address this issue we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. 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 proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers 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.

Constructing forest roads is essential if active management is desired, and we are glad that the BLM is proposing the roads that are needed to access and treat as much as 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. 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, and we are glad the BLM is working to accommodate this.

AFRC is happy to be involved in the planning and decision-making process for the Bear Creek CE. Should you have any questions regarding the above comments, please contact me at 541-517-8573 or at aastor@amforest.org

Sincerely,

Amanda Astor
Southwest Oregon Field Forester
American Forest Resource Council