



November 9, 2018

Ferris Couture  
Bureau of Land Management  
Grants Pass Field Office  
2164 NE Spalding Ave.  
Grants Pass, OR 97526

**In Reply to:** Spencer Creek Hazard Tree Removal Project

Dear Mr. Couture:

**Introduction**

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 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 appreciates the urgency to clear these hazards.

**Proposed Action**

The CX being utilized allows for up to 250 acres to be salvaged. The Grants Pass Resource Area is only planning 28 acres of treatment. Within the LSR, the 2016 SWO RMP states on page 71, "Do not conduct timber salvage, except when necessary to protect public safety, or to keep roads and other infrastructure clear of debris." All areas near the road should be salvaged and harvested for the safety of the public. There is one area that is not included within the unit directly adjacent to the road. Is this due to sub-merchantable material, light burn severity, or another reason? **Please clarify the reason for these "dropped" acres within the CX.**

### **Economics**

Salvage operations are more expensive than “green” operations. This is due to the fact that machines need to be cleaned more often, less product can be recovered from the raw material, and the opportunity cost is higher due to short operating seasons from quickly declining wood quality compared to operating on a “green” sale. AFRC hopes that this is taken into consideration during the appraisal/contract development stage.

### **Impacts of the Proposed Action on Carbon Sequestration and Climate Change**

Fires release copious amounts of carbon dioxide (CO<sub>2</sub>) into the atmosphere. When trees are salvaged from these fires and re-planted, the ecosystems begin to recover and sequester those gases back into the new trees and wood fibers. It is vital these areas are salvaged and replanted in order to start this process as soon as possible. Without salvage logging and re-planting, fire scars can become desolate, void of all signs of a forested ecosystem. Fires deforest landscapes when management does not follow them.

### **Project Design Feature**

The timber products provided by the BLM are crucial to the health of our members operations and the communities that they support. 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 Roseburg 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.

The newest operating system is cable assisted logging. AFRC appreciates the inclusion of this equipment and its effects into the PDFs.

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 or not, and we are glad the BLM is working to accommodate this.

As stated above, flexible and condition based PDFs allow for better and more opportunities for the land to get treated in a timely fashion. Project design features should be specific to the project and align with the RMP. If the PDF is outlined in the RMP it does not need to be rewritten in the project document. By including a date, the operator has no opportunity to work when the weather is nice, but it is outside of the timing restrictions. Because shut downs occur in inclement weather during the operating season, it is only fair that operations can occur when conditions are favorable, no matter what time of year it is. Below are concerns and suggestions AFRC has that would align the PDFs with industry's needs and implementation concerns.

***Please make sure all PDFs are project specific.***

***Please make sure PDFs are not reiterations of the RMP Standards and Guidelines.***

***Please delete operating date restrictions, when the objective of the PDF is condition based.***

### **Other Comments**

It is important to note that the Smith and Cluck paper is but one guide to determining hazardous trees. Common sense and professional judgement may contradict the paper but can be warranted in specific situations. Understanding what will happen to the area without salvage and planting is key in making realistic on-the-ground decisions.

AFRC appreciates the inclusion of Figure 1: Visually Estimating Percent Crown Kill, USDA Forest Service RMRS-GTR-132. 200 on page 25, but **please incorporate Appendix 1 and 2 into a single marking guide for fire-injured trees**. It is confusing to have two separate guides. The fact that there are also two Figure 1's is also confusing.

**Please make Exhibit A available, via a picture, for the public to view.**

**Summary**

AFRC is excited to see how this project gets finalized. We are hopeful the BLM thinks critically about the comments presented here about the project. Clear, concise, and transparent explanations of decision-making and methodology are key to a well done NEPA document.

Should you have any questions regarding the above comments, please contact me at my office: 541-342-1892, cell: 541-517-8573, or email: [aastor@amforest.org](mailto:aastor@amforest.org).

Sincerely,

Amanda Astor  
Southwestern Oregon Field Forester  
American Forest Resource Council