



January 8, 2019

Rebecca Brooke
Bureau of Land Management
Upper Willamette Field Office
3106 Pierce Parkway, Suite E
Springfield, OR 97477-7910

In Reply To: London Road EA

Dear Ms. Brooke:

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 Upper Willamette 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 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 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 into the future. O&C Lands are required by law to be managed for "permanent forest production." While we do not agree that the current RMPs actually

meets this mandate, proper implementation of the plan's timber harvest levels is a necessary step toward meeting the Act's requirements.

In our scoping comments submitted for this project we outlined our interpretation of how the Eugene SYUs ASQ of 53 MMBF was calculated through vegetation modeling during development of the 2016 RMPs so that the RMPs would comply with the O&C Act's mandate of sustained-yield timber management. We outlined that we believe that the BLM must implement treatments that comply with those vegetation models in order to manage sustainably. A management approach that discards the models used to calculate the 53 MMBF number would ultimately result in the attainment of this 53 MMBF number extremely unlikely. This is not the first project on the Upper Willamette field office that we have outlined this interpretation. The BLM has addressed this request of ours in past EAs but seems to have elected not to for the London Road EA. Regardless, we maintain our position on the role of the vegetation models used to calculate the ASQs for each SYU covered by the 2016 RMPs and believe that the BLM must conduct management treatments on the HLB in accordance with those models.

The London Road EA describes the purpose of the project, and the included management actions on lands designated as HLB, as to “contribute to the declared ASQ of the Eugene SYU.” **We urge the BLM to distinguish between “contributing ASQ volume” and “managing timber resources consistent with the principles of sustained-yield.”** These two are **NOT** the same. The BLM “*offered ASQ volume*” since 1994—but as your 2012 RMP Evaluation Report noted, you were not managing sustainably.

Below is a table compiled from BLM source databases used in the modeling for the Proposed Resource Management Plan (PRMP), which is copied below. The ASQ that the Upper Willamette Field Office references numerous times in the London Road EA was not pulled out of thin air—instead, it was *calculated* based on a cycle of regeneration harvest and commercial thinning of forest stands of specific ages. If the BLM does not adhere to these calculations, then the calculated ASQ is meaningless and unattainable. Furthermore, the ASQ for the Eugene Sustained Yield Unit (SYU) is only **sustainable** if these models are followed as closely as possible.

Eugene SYU

HMP Desc	Age Grp 2013	GIS Acres	First Decade	First Decade
			Regen	Thinning
Mod Intensity	1) 0-30	14,827		
	2) 40-70	33,900	5,197	2,998
	3) 80-110	6,840	4,208	
	4) 120-150	67	44	
	5) 160-190	3	2	
	6) 200+	9	9	
Total Mod Intensity		55,647	9,460	2,998

Coincidentally, the stands analyzed in the London Road EA were modeled for both thinning and regeneration harvest. Therefore, by our calculation, both action alternatives comply with these vegetation models. The potential attainment of the SYU's ASQ of 53 MMBF outlined in Tables 5 & 6 in the EA should be the primary driver of which alternative is selected. AFRC believes that the Eugene SYU should be striving to attain their ASQ of 53 MMBF each year, despite the "allowance" provided in the 2016 RMPs for each SYU to underachieve. Obviously, attainment of this level is contingent on other actions aside from those analyzed in the London Road EA. However, Table 6 clearly indicates that implementation of alternative 3 would bring the SYUs attainment of the ASQ closest to the calculated value of 53 MMBF assuming all other projects contribute their expected levels of timber volume. Implementation of alternative 2 which produces less volume toward the declared ASQ coupled by the SYU falling short of its declared 53 MMBF level in FY19 would be disappointing.

The timber products provided by BLM are crucial to the health of our membership. Without the raw material sold by 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 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. We would like to applaud the Upper

Willamette Field office for continuing to be leader in developing NEPA documents that provide flexibility to the diverse logging infrastructure operating in Oregon. The language on page 8 of the EA that permits purchaser discretion to utilize their preferred logging methods while still adhering to the resource protection measures outlined in the 2016 RMPs should be a model for all other field offices in western Oregon to mimic. The inclusion of the provision for winter logging in the Purpose & Need is also commendable. The language on page 3 of the EA clearly shows that the Upper Willamette field office understands the complexities surrounding the forest sector's need for year-round work as well as the challenges surrounding helicopter yarding during summer months. We believe this flexibility will ultimately result in more active bidders on the subsequent timber sales, higher bid premiums, and a more favorable work environment for forest contractors. Thank you.

Constructing forest roads is essential if active management is desired, and we are glad that 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. During scoping, we made field visits to most of the proposed units and commented on several challenges logging locations; particularly regarding the SE corner of Unit 17. The maps provided in the EA illustrate a reasonable plan for facilitating conventional yarding for these portions of the unit by using yarding wedges through narrow strips of private land. We appreciate the foresters on the field office taking the time to design this workable system.

AFRC is happy to be involved in the planning and decision-making process for the London Road EA. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or ageissler@amforest.org.

Sincerely,

Andy Geissler
Western Oregon Field Forester
American Forest Resource Council