



April 22, 2019

Teresa Trulock, Field Manager  
Bureau of Land Management  
Medford District; Butte Falls Field Office  
3040 Biddle Rd.  
Medford, OR 97504

**In Reply to:** Mile Fire Salvage Project

Dear Mrs. Trulock:

### **Introduction**

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Mile Fire Salvage 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 Butte Falls Field Office (FO), 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. AFRC appreciates the urgency to clear these hazards and recover the economic value of the standing timber.

### **Economics**

AFRC believes the key to a successful salvage project is prioritizing the best quality dead/dying wood for removal through high merchantability/removal specification, overestimations of defect (to "play it safe") and understanding that economic value cannot be obtained if the sale is unlikely to sell. Salvage operations in the Rogue Valley are not money making ventures in most circumstances. Salvage operations are more expensive than "green" operations and deterioration through insects, diseases, and moisture loss causes rapid loss of recoverable value. The *Purpose and Need* of the project sites specific salvage direction from the SWO ROD/RMP that salvage would be implemented when it is

“economically viable”. To address this direction, ISSUE 1: “*How would the proposed salvage harvest (area and roadside) offer short and long-term timber volume contributing to the Medford District’s ASQ and the local and regional economy?*” has been analyzed in the EA. The ISSUE 1 analysis starting on page 21 of the EA is a good attempt at including an economic review of a project, but the assumptions and costs used are inaccurate. The end result is a project that seems economically feasible. Risk factors have not been taken into consideration, nor have the implications of restrictions. Risks include the amount of road renovations, likely timing of the decision/timber sale auction, unknown defect, percentage of helicopter, wet season haul limitations, in-stream-work restrictions, etc.

The paragraph above 3.3.2 on page 22 of the EA states “Management actions, such as activity fuels management and road work, have economic effects; however, the primary focus of these actions is not for inputs to the economy but to provide for resource management. As a result, the economic effects of the non-commodity based actions are recognized but are not a primary decision factor in considering implementation of the Proposed Action.” Under the 3.2.2 header, the fourth bullet states that the economic return to the Federal Treasury is calculated by pond value minus logging costs, where logging costs include road costs. Please clarify if road costs have or have not been included in the approximately \$1.4 million that is expected to be generated to the Federal Treasury for this project. In addition, if 50% of the sold value of each sale is given to the O&C Counties, then the total value of the wood from this project is \$2.8 million. This estimation is unrealistic when considering the risks associated with any sale, let alone a salvage sale with 45% helicopter logging that will likely be sold in the middle of summer/fire season and has approximately 50% of its volume only available for haul in the summer (it is unclear if all roads will allow wet season haul with a waiver). Any ability to take risk off of the purchaser is suggested for the success of this project. This includes limiting restrictions, increasing flexibility, dropping the stumpage, and increasing costs in the appraisal. The general logging costs associated with the analysis are far from accurate. The costs should at least be increased as shown: ground-based – \$20 more, cable – \$50 more, helicopter – \$100 more. Additionally, page 29 of the EA states that “proposed sky-line yarded units would have full suspension.” Fully suspending logs can increase the complexity of a cable system and the amount of deflection necessary for a successful yarding operation. This may increase the cost of logging in these stands greater than that stated above. It is also confusing because on page 46 of the EA an example PDF states, “[...] requiring at-least one end suspension through the remaining areas across the Riparian Reserve.” This seems to imply there will be areas where one end suspension will be implemented. Please clarify whether all sky-line units will have full suspension or not.

Table 4 on page 11 of the EA describes each EA unit for salvage harvest. Approximately 45% of the acres will be harvested with a helicopter. It is expected that these are exceptional units as to allow this harvest method in salvage operations. Unfortunately, our field visits to the Project Area prove otherwise. The helicopter units are not the best units in the EA and will not provide adequate volume to offset the costs and risks in the helicopter units. Recently, The BLM offered the Big Graves Salvage Sale. This sale only has ground-based and cable harvest systems with just under 4 MMBF and a minimum bid of just over \$280,000. The sale has wet season haul allowed with a waiver

from the BLM based on extended dry conditions. The Big Graves Salvage Sale was auctioned in February and did not receive any bids. This example shows just how far off the EA's economic analysis and the BLM's definition of economic feasibility is from reality and their industry partners.

### **Proposed Action**

The proposed action consists of 406 acres of treatment resulting in approximately 4-6 MMBF of volume removed. Trees to be removed include those above 12 inches DBH and a 40% probability of mortality as determined by the Smith and Cluck 2011 paper. In addition, danger trees may be removed according to the OSHA standards. AFRC thanks the BLM for starting with a minimum removal specification of >12 inches DBH. This standard is likely to remove some of the risk on potential purchasers. AFRC believes this minimum removal specification should be increased even further due to observed degradation in the area.

According to the EA, there are 159 UTA acres, 33 LITA acres, and 40 DDR-TPCC acres included in the area salvage portion of Alt. 2. AFRC appreciates the inclusion of the DDR-TPCC acres in the salvage operations but would like further explanation as to why and how the appropriate basal area retention was determined. Some of the units follow the UTA standards while others follow the LITA standards. Please help us understand how the determination was made.

Appendix E includes Table E-2 where the basal area retention prescriptions have been provided for the area salvage units. According to the SWO ROD/RMP the minimum retention in the UTA is 5% of the pre-harvest stand basal area, while LITA is 15% of the pre-harvest stand basal area. Without knowing what the pre-harvest basal area is, it makes it difficult to understand what proportion is prescribed to be left in the stand. Please clarify if the numbers provided in the table represent the minimum retention necessary for salvage operations according to the SWO ROD/RMP or if they exceed the minimum retention. If they exceed the minimum retention, please explain why these extra trees will be left on the landscape.

As discussed earlier, a large proportion of the EA has been identified as using the helicopter harvest method. The BLM identified 8 helicopter log landings and 2 helicopter service landings. The EA states on page 12 that “[y]arding wedges are identified during the analysis process but are more typically identified during the final unit layout.” This is true and allowing additional flexibility through utilizing language such as approximate numbers allows for clarity and transparency between analysis and implementation. Additionally, Table 5 on page 12 identifies landings. Landings are spatially represented in Appendix B-Maps. Adding language that allows flexibility of location and number of landings, especially those for helicopters, adds another layer of flexibility and clarity to potential purchasers as well. Purchasers often locate additional or better landings for the type of helicopter used and the needs they independently have. Please allow for this additional flexibility. AFRC would also like to point out that the inclusion of “Yarding of Unmerchantable Material (YUM)” in this project is very expensive and should NOT be a

requirement. This will only create a more expensive operating situation for any potential purchaser or contractor.

The second portion of the Proposed Action is Roadside Salvage, 173 acres. Similar to the area salvage, minimum removal specifications are set at >12 inches DBH and meet at least a 40% probability of mortality according to the 2011 Smith and Cluck paper. We are unclear why exactly these two types of treatments were separated other than the type of harvest equipment and method likely to be utilized. Due to the identification of these units as roadside salvage instead of roadside hazard tree removal, retention minimums are required. This implies some hazards may be left on the landscape because 5% (UTA) - 15% (LITA) of the basal area is necessary to be retained according to the BLM's RMP. In addition, LSR's and RR's do now allow salvage, but hazards are allowed to be removed from them. Please clarify whether or not all of the hazards (anywhere on the landscape) will be removed within the Project Area or not. The swath on either side of the road seems to look like the same swath utilized for hazard tree removal, i.e. trees that are likely to fall into the road way. If safety was the concern when determining these units and is the main difference between this treatment and the area salvage treatment, then why not call it a hazard tree removal? Additionally, hazard tree removal can be completed through the roadside maintenance CE and have already been taken care of by this time. Please help us understand exactly what the reason for the separation between the two treatments is and what the purpose for the roadside treatment itself is.

There are 63 miles of timber haul and road renovation. Road renovation is time consuming and will delay the harvest of merchantable units. This delay can make or break the economic feasibility of already sub-par material. Again, the BLM is adding additional risk to the purchaser and decreasing the value of the wood that is available for harvest in the Project. As a reminder, the ford crossings that are required to be rocked can only occur between June 15-September 15 as well and add additional restrictions on roadwork as well.

#### **Alternatives Considered but not Analyzed in Detail**

The second alternative in this section is labeled "Propose Less Helicopter Logging, Construct Roads to Support Ground-based or Skyline Logging Systems for an Economical Timber Sale." The last few sentences of the paragraph below this section on page 16 of the EA, suggests that helicopter units have only been proposed where economically feasible and due to the fact that many of the helicopter landings can support multiple units, the helicopter units are more feasible. We are not sure why having more than one unit to each helicopter landing makes a more economical unit (other than transportation costs), or how this economic viability for each unit was determined, but AFRC does not come to the same conclusion about economics as the BLM for the Proposed Action.

The third alternative under this section refers to removing hazards in the RR, but we would like to open it up to all reserves. It is unclear what the BLM's response is here as stated earlier in this comment letter. The BLM seems to say all hazards are to be identified by the potential purchaser of the sale. AFRC is still unclear if the BLM is proposing hazard tree removal or not and where within the Project Area it is going to be allowed. Please clarify this topic for us, the potential operators, and the public at large.

### **Northern Spotted Owl (NSO)**

Management direction and land use allocations in the 2016 SWO ROD/RMP are intended to constitute the BLM contributions to the recovery of the northern spotted owl. Incidental take avoidance should be the only reason why salvage in the HLB is deferred. AFRC would like the BLM to analyze all salvage treatments in the HLB that are economically viable and avoid incidental take in order to meet your resource objectives. We appreciate the effort to reclassify habitat based on fire severity and proximity to habitat that was unburned. AFRC understands that a seasonal restriction will be implemented in accordance with this reclassification. Please help us understand where exactly these restrictions will be located and how the large amount of helicopter logging will be impacted by the restrictions.

### **Project Design Features and Restrictions**

Although Appendix D does include many date ranges for when certain activities can and cannot occur, AFRC appreciates the included flexibility in the majority of the PDFs reflecting the use of conditions to base shut-down and start up operations. AFRC did notice however that the inclusion of low soil moisture levels leading to shut-down of operations or pushing out start up times is still present. The use of as low as 15% soil moistures is inconsistent with other Districts and should be made consistent across the O&C lands.

### **Other Comments**

AFRC acknowledges the importance of a hazard tree marking guide. We would like 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.

### **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.

AFRC is thankful to be involved in the planning, environmental assessment (EA), decision-making process, and implementation of the Miles Fire Salvage Project. Should you have any clarifying questions regarding the above comments, please contact me at the Eugene AFRC office: 541-342-1892, cell: 541-517-8573, or email: [aastor@amforest.org](mailto:aastor@amforest.org).

Sincerely,



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