AMERICAN FOREST RESOURCE COUNCIL

August 13, 2018

Michael Korn
Bureau of Land Management
Roseburg District
777 NW Garden Valley Blvd.
Roseburg, OR 97471

In Reply to: Horse Prairie Fire Recovery Plan EA

Dear Mr. Korn:

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 Roseburg District, 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.

Northern Spotted Owl (NSO)

The effects to NSO on page 35 of the EA are concise and informative. AFRC is thankful for the realistic decision to downgrade dispersal habitat within the three units that have it in order to meet your resource objectives.

Riparian Reserves

No treatment is being proposed within the riparian reserves. AFRC would like to see management and salvage efforts within the outer and middle riparian reserves using the inner reserve as a buffer. Treatment in these locations was not analyzed and could contribute an increased ability to reforest the burn scar.

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_2) 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.

Please be sure to mention in the No Action Alternative the realistic outcome of the fire scar if no salvage operations and re-planting occurs. Deforestation is real in the United States, and it most often occurs after fires have burned through environments and are left unmanaged and not replanted.

Monitoring

Page 53 briefly describes the monitoring for this project. What are the metrics used for monitoring? How do monitoring efforts influence future projects? At what level is monitoring conducted (on-the-ground employees or large scale upper management)? Does the BLM develop monitoring reports every year?

Project Design Feature – Appendix C

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 tethered logging. This system allows ground based equipment to operate on slopes greater than 35% by decreasing the PSI of the machine and therefore the ground disturbance. Please do not write yourself out of using this innovative technology by prohibiting ground-based logging equipment. **We recommend phrasing the language in your ensuing NEPA document to focus on desired end results for soil conditions rather than prescribing the type of equipment necessary to meet those conditions.**

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

AFRC appreciates the marking guide located in Appendix D. It is important to note however, 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 happy to be involved in the planning, environmental assessment (EA), and decision-making process for the Horse Prairie Fire Recovery Plan EA. 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.

Sincerely,

Amanda Astor
Southwestern Oregon Field Forester
American Forest Resource Council