



September 10, 2018

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

In Reply To: Row River EA

Dear Ms. Schank:

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 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 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.

We have expressed our concerns with how the past management paradigm under the Northwest Forest Plan (NWFP) of exclusive thinning impacted BLM’s ability to achieve this long-term sustainability. When the NWFP was conceived in 1994, 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 that form the underpinning of long term sustainability, 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 these facts 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 for the 2016 RMPs, published by BLM last summer. Once again, 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 described above are not replicated under the current RMP. **A failure to implement would be characterized by BLM ignoring the sustained yield models and proposing treatments in conflict with those models, thus leading to an unsustainable management scheme.**

Achieving an ASQ that is sustainable in the long-term is vitally important to AFRC and its membership and it will take a deliberate approach by BLM to managing

the Harvestable Land Base (HLB) to make it happen. This deliberate approach will require a major paradigm shift from how the BLM managed its O&C Lands over the past twenty years. The Upper Willamette Field Office states on page 4 of the EA that “the decision-maker directed the interdisciplinary team to assume that regeneration would occur on stands over age 60, whereas stands under age 60 would undergo commercial thinning treatments. The rationale for the age cutoff was to prepare the Field Office for meeting ASQ targets.” This approach is *not* deliberate and far too arbitrary to set the BLM on a trajectory of meeting ASQ sustainably in perpetuity. **We urge the BLM to distinguish between “offering 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 Row River EA was not pulled out of thin air—instead, it was carefully *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. Randomly selecting the age of “60” as an appropriate threshold for how to conduct sustainable timber management ignores the analytical approach used to ensure the public that these timberlands will be managed sustainably.

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

Management direction and land use allocations in the 2016 NCO 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. Nowhere on these pages does the BLM cite any other mitigation measures—therefore, in our opinion, incorporation of any other mitigation measures would be an act outside of the management direction of this plan.

The Row River EA appears to deviate from this concept. Table 15 on page 51 of the EA indicates that the BLM deferred acres from treatment due to “NSO Appendix A Guidance.” The language in Appendix A is extremely convoluted and often contradictory of itself, which makes its intent difficult for AFRC to interpret. However, one thing that is clear is that the “guidance” in Appendix A is to be followed only “to the extent consistent with the management objectives.” Therefore, we believe it is imperative that the BLM provide an explanation of how any deferral based on Appendix A “guidance” is consistent with each described Management Objective. In this case, the BLM needs to describe how the acreage deferral outlined in Table 15 is consistent with the Management Objective of “Manage forest stands to achieve continual timber production that can be sustained through a balance of growth and harvest.” How does the BLM propose to manage the deferred acres to achieve this objective?

An Information Bulletin dated July 21, 2017 was sent to the District Managers of each BLM District managing under the 2016 RMPs. This bulletin was titled “*Timber sale planning approaches to avoid take of northern spotted owls under the 2016 RMPs.*” Appendix 2 of this bulletin titled “Evaluation of Take Potential” includes guidance on how to assess incidental take. Page 1-16 of this Appendix reads that the best available science indicates that forest habitat needs of the owl should be assessed at the core and home-ranges scales. Specifically, that literature has demonstrated the “*importance of having sufficient amounts of NRF habitat within owl core areas*” and that “*populations are stable when the average proportion of NRF habitat in the home range is 30-50%.*” Nowhere in this document is there any guidance or scientific literature that suggests the home-range and core area as adequate scales for assessing needs of dispersal habitat. In fact, on the contrary, page 1-19 of this bulletin suggests that “*the effects analysis for owl dispersal habitat considerations is informed by landscape conditions, as suggested by Thomas et al. (1990) along with Lint et al. (2005) and Davis et al. (2016).*” More specifically this page goes on to read that “*as assessment of dispersal habitat condition was recommended on the quarter-township scale by Thomas et al. (1990)*” and that “*the U.S. Fish and Wildlife Service has subsequently used fifth-field watersheds or larger*

landscapes for assessing dispersal habitat conditions because watersheds or provinces offer a more biological meaningful way to conduct the analysis.”

The purpose of dispersal habitat described by Thomas et al. is to “...facilitate movement of owls between HCAs...” The name of the HCAs (habitat conservation areas) was later changed in the NWFP to Late Successional Reserves (LSRs). To provide a high level of connectivity between HCAs, the distance between HCAs of seven miles was selected. They opted not to adopt a corridor strategy but “...developed management standards for the intervening matrix...” between the HCAs. Thomas et al. established standards and guidelines which specified “...that 50% of the forest matrix outside HCAs be maintained in stands of timber with a mean d.b.h. of 11 inches or greater, with at least 40% canopy closure.” They believed that “...50% of the land base in a regulated forest would be older than 40 years old...” with a rotation age of 80 years and expected that this would be “...suitable for passage by dispersing spotted owls.” It is clear that dispersal requirements were not to be applied inside HCAs (LSRs) or within spotted owl home ranges but rather would apply to the land between these measure on a fifth-field watershed or larger.

AFRC can find no analysis in the Row River EA that reflects any of this guidance on how to assess dispersal habitat needs in the context of NSO take avoidance. Page 70 of the EA states that “At high-priority sites, guidance calls for vegetation management projects that maintain or enhance spotted owl habitat potentially affected by the project.” However, what type of habitat is not specified here. Based on the best science and the BLM internal memos it seems that only suitable NSO habitat should be assessed at the site scale. Page 82 of the EA goes on to describe treatments analyzed under alternative 4 that “would maintain the ability of all four of the affected high-priority site centers to support spotted owl occupation, survival, and reproduction.” Included in this alternative is the proposal to “maintain the function of dispersal habitat.” However, the BLM provided no scientific reasoning to support this notion. The science that we referenced above contradicts the design features of alternative 4. It seems the BLM was clearly assessing the need to maintain dispersal habitat in the context of the core area and home range rather than the landscape and/or fifth-field watershed scale as suggested by the best available science and recommendations by the U.S. Fish and Wildlife Service. ***We would like an explanation from the BLM that describes the analytical and scientifically-based process used to determine that the maintenance of dispersal habitat described in alternative 4 is necessary to avoid incidental take of NSOs.***

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. As stated above, we understand that 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 EAs and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like 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 a 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 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 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 BLM is working to accommodate this.

AFRC is happy to be involved in the planning and decision-making process for the Row River 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