



October 5, 2018

Cheryl Adcock, Field Manager
BLM Northwest District
Springfield Interagency Office
3106 Pierce Parkway, Suite E
Springfield, OR 97477

In Reply To: Nails Creek EA

Dear Ms. Adcock:

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 Siuslaw 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. **We need 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). As we stated above, BLM’s requirement to manage their lands under the principles of sustained yield can only be met if the implementation of the plan adheres to what was modeled. These modeled numbers were also integral to calculating each District’s Allowable Sale Quantity (ASQ). **The ASQ for the Eugene SYU is only sustainable if these models are followed as closely as possible.** For example, if the Eugene SYU fails to implement 4,208 acres of regeneration harvest in stands in the 80-110-year age group in the first decade, then the District’s ASQ will eventually be unattainable. Likewise, if the Eugene SYU chooses instead to thin 4,208 acres in the 80-110-year age group rather than regen-harvest, the ASQ will eventually be unattainable. As you can see in the table below, stands in age groups of 80+ years were only analyzed for regeneration harvest—**treating stands in those age groups with thinning would be a violation of your RMP as the PRMP/FEIS did not consider the sustained-yield-impacts or the resource-effects of implementing such treatments.**

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

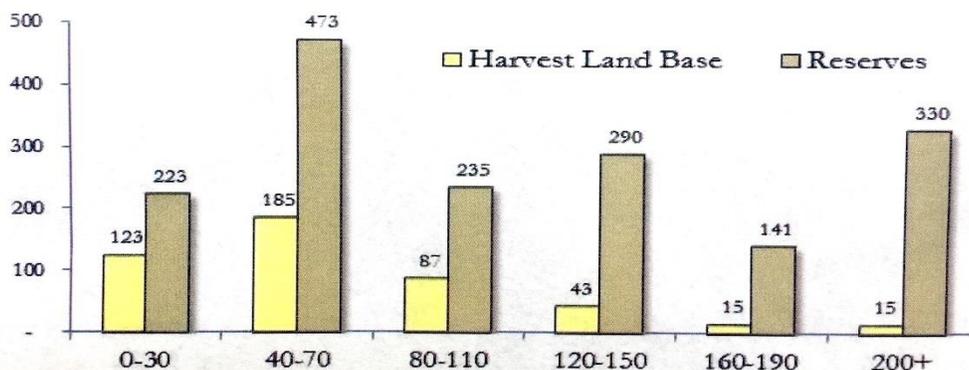
The Nails Creek EA describes why the proposed stands are being proposed for treatment. The EA describes the purpose of this action is to “conduct regeneration harvest to produce timber to contribute to the attainment of the declared ASQ.” We assume that the BLM is considering any timber harvest off of lands designated as HLB to be “contributing to ASQ.” However, like we describe above, while aimlessly harvesting timber off of lands designated as HLB would “contribute ASQ volume”, it would not necessarily do so in a sustainable manner. The ASQ that you are “contributing to” was calculated based on the above vegetation models. Therefore, in our opinion, the BLM

should have described in the EA that the stands selected for regeneration and thinning treatments were selected because the vegetation models compel the BLM to do so. Instead, page 5 of the EA states that “this project was selected because it was considered low risk to the northern spotted owl.” We assume this statement is based on some of the language from Appendix A of the 2016 RMP which provides guidance to the BLM that while achieving management direction, such as “*Manage forest stands to achieve continual timber production that can be sustained through a balance of growth and harvest*”, the BLM should, if consistent with this management direction, start with the low-hanging fruit; essentially, those stands where likelihood of incidental take of northern spotted owls is low. However, we do not believe that these stands were selected simply because of “low risk” to the owl. If that is the case, then we have some concerns with the deliberate approach to implementing the 2016 RMP that the Field Office is taking as it relates to achieving the ASQ in a sustainable manner.

We have concerns with a statement made on page 7 of the EA. Here the BLM states that “Unit 2 and Unit 3 have reached conditions where growth has slowed due to stand ages because stands have reached maturity making them ready for regeneration harvest.” This statement harkens back to the notion of Culmination of Mean Annual Increment (CMAI), which was part of the BLM’s 1995 RMP but is NOT part of the 2016 RMPs. This is important for several reasons. When, during plan development, the BLM designated stands into specific land allocations they deliberately did so in a disproportionate manner in regards to stand age and development stage. Specifically, the VAST majority of older stands were placed into the reserve system. Conversely, the VAST majority of younger stands were placed into the HLB. See the illustration below:

Western Oregon - Age Class and Allocations

Graphic 1 – 2,162,000 Forested Acres – (1,000s)



In doing this, the BLM designated most of those stands that have, as the Nails Creek EA states, “reached maturity” and “are ready for regeneration harvest” in the reserve system. This leaves thousands of acres of stands that have NOT reached maturity in the HLB. Those “immature” stands MUST also be regeneration harvested as directed by the vegetation models if the BLM plans to manage its HLB in conformance with the principles of sustained-yield. Specifically, 5,197 acres of stands between the age of 40-70 must be regen-harvested in the first decade. However, we assume that most of those stands have NOT reached maturity; but they ARE “ready” for regeneration harvest because most all of the stands that have reached maturity are in the reserve system.

We do appreciate that the Siuslaw Field Office recognizes both the vegetation models and how, as you state on page 7, “every individual timber sale planned within the HLB serves an integral function in contributing toward meeting the sustained yield objectives of the RMP.” Now we urge the Field Office to take the next step and recognize the direct connection between these models and the ASQ that was calculated from them. **The ASQ of 53 MMBF for the Eugene SYU was not randomly selected—it was calculated;** more importantly, it was calculated from the vegetation models. Page 259 of the RMP/EIS states that **“the calculation of the ASQ for each alternative is a direct output from the vegetation modeling analysis.”** It appears based on the language in the Nails Creek EA that the Siuslaw Field Office recognizes this. We hope in future projects that you make a clear connection between your RMP Objective of “Managing forest stands to achieve continual timber production that can be sustained through a balance of growth and harvest” and adhering to the models.

We also appreciate that the Nails Creek EA “tiers” to the PRMP/FEIS multiple times throughout the EA to describe expected impacts to a variety of resources resulting from implementation of the action alternatives analyzed. Here, the BLM relies on the assumed impacts analyzed in the PRMP/FEIS, not the ROD, to support the impacts that the proposed treatments analyzed in the Nails Creek EA will have on numerous relevant resources. We urge the Siuslaw Field office to strongly consider what assumptions and analysis these “assumed impacts” are based on. This analysis in the PRMP/FEIS that the Siuslaw Field Office is tiering to is based on an assumed mix and amount of timber harvest. For example, on page 22 of the EA the BLM states that “the effects of the proposed action on carbon storage and greenhouse gas emissions tiers to the analysis in the Final EIS.” Surely the BLM would agree that the act of thinning 4,208 acres of stands over 80 years old would have different impacts to both carbon storage and greenhouse gas emissions than the act of regen-harvesting and stand reestablishment of 4,208 acres of stands over 80 years old. AFRC is confident that these impacts would be very different. So, the question we would like the BLM to consider is—which of these two scenarios did the PRMP/FEIS analyze? And, if the Siuslaw Field Office were to

implement a scenario that the PRMP/FEIS did *not* analyze, then is the tiering that is described in this EA valid?

AFRC would like to remind the Siuslaw Resource Area that management direction and land use allocations in the 2016 NWO ROD/RMP are intended to constitute the BLM's 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.** In other words, the fact that the BLM adopted the liberal designation of 80% of the O&C Lands into reserves, including nearly *all* of the older stands (see table below), along with "lighter-touch" silvicultural prescriptions in the HLB should allow for implementation of sustained-yield timber management on remaining O&C Lands in the HLB unencumbered by NSO concerns. Incidental take avoidance should be the *only reason* why treatments in the HLB get deferred for NSO considerations.

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 Nails Creek 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