



November 27, 2018

Elizabeth Burghard, District Manager  
Bureau of Land Management  
Medford District  
3040 Biddle Road  
Medford, OR 97504

Dear Elizabeth:

The economic viability of the Medford District's timber sale program is of vital importance to both AFRC's and SOTIA's membership and the residents of counties that receive public services funded by shared BLM timber receipts. Not only do the local timber industry and the counties depend upon the provision of quality timber products, but they also depend on the feasible delivery of those products to local manufacturing facilities in a manner that generates receipts to local governments. High quality timber that cannot be delivered in an economical fashion does not enable the industry to manufacture wood products, keep their mills running, or keep their employees working; nor does this provide local counties with receipts generated from the sale of those timber products. Over the past year, we have seen the BLM put up for sale over 35 MMBF of timber that, ultimately, was designed and/or appraised in a manner that made its delivery to local mills uneconomical. Included in this total is a salvage sale generated in response to the Horse Prairie Fire on the Roseburg District. This first sale was offered in late summer 2018 at a point where the quality of the timber was severely deteriorated due to wood-boring insect damage. While the BLM was able to officially tally the volume of this sale toward their "accomplished" target in FY18, the actual outcome provided no benefits to either the local industry or the county beneficiaries; nor did it enable the BLM to meet the resource objectives outlined in the environmental analysis document prepared. Despite the indications of the first no-bid sale, the BLM prepared and offered another salvage sale off the same fire in late November where the quality of the burnt timber had deteriorated further. It came as no surprise to us that this second salvage sale also received no bids.

In light of the ineffectiveness of the Horse Prairie salvage efforts we would like to request that the Medford District proceed with caution and deliberation when developing a strategy to address the impacts of this summer's fires on O&C Lands. AFRC and SOTIA are supportive of timber salvage treatments on affected lands managed under the principles of sustained yield as directed by the O&C Act. It is imperative to capture the value of damaged timber products through salvage sales and to adequately reforest the affected acres to ensure a healthy forest for future generations. However, it is also critical to design these salvage sales in a manner that will enable the damaged timber products to be delivered to local mills in an economically feasible manner that will subsequently provide receipts to the counties. Proceeding with efforts that have a low probability of success will not treat the land, generate timber products, or support local economies or governments.

Over the past several years, wood-boring insect activity on forest lands impacted by wildfire in southwest Oregon has accelerated substantially. This damage is occurring not only at larger scales but also at quicker rates. Private forest landowners with lands impacted by the Taylor Creek, Ramsey Canyon and Miles fires have begun to salvage their burnt timber resources and have already reported significant insect damage to a degree that is compromising the usefulness of those resources. This unfortunate reality has compelled AFRC and SOTIA to advise the local Forest Service offices to work with industry professionals *prior* to pursuing any significant level of post-fire salvage on their affected lands. We would like the opportunity to create the same level of partnership with the BLM as you move forward with assessing your salvage opportunities. Involving those who have an intimate knowledge of local conditions pertaining to timber quality in the wake of this summer's fires is integral to delivering a BLM salvage program in 2019 that not only generates sales but also generates economically viable sales.

At this juncture it is difficult to estimate the future quality of damaged timber products off the affected Medford District lands. However, it is safe to assume that the sub-standard timber quality being reported by private landowners will only worsen with time. We would like for you, with the help of the timber industry, to prioritize those areas where future salvage operations have a high probability of success and use the tools at your disposal to expedite the implementation of those operations. Such tools include the roadside removal and 250-acre salvage harvest categorical exclusions.

We would like to meet with you and your staff to discuss a strategy that will maximize the treatment of the O&C lands, deliver useful timber products to the local industry, and generate receipts that can help fund essential public services. Please contact us as soon as you are able.

Sincerely,



Andy Geissler  
Western Oregon Field Forester  
American Forest Resource Council



David Schott  
Executive Vice President  
Southern Oregon Timber Industry Association

cc: Chris McAlear  
Kathy Stangl  
Abraham Wheeler  
Rocky McVay