



November 26, 2018

Michelle Calvert
Bureau of Land Management
Medford District; Butte Falls Field Office
3040 Biddle Rd.
Medford, OR 97504

In Reply to: Mile Fire Salvage and Hazard Tree Removal Project

Dear Ms. Calvert:

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 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 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 would like the BLM to be explicit in its analysis and ensuing NEPA document about what is likely to happen to this landscape void of the proposed action. Analyzing how this may affect the safety, vegetation, carbon sequestration, hydrology, future fire risks, and economics in the project area are just a few topics AFRC would like to see analyzed under this project. Safety is a large concern for your staff, recreators and contractors who will be working in the area, and firefighters should a fire occur in this area in the future. AFRC would like the Butte Falls FO to consider a lower probability of mortality along the roadways within the project area compared to the area salvage operations to make sure they are not taking any chances when it comes to the safety of the public.

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. AFRC hopes that this is taken into consideration during the analysis and highly recommends a swift analysis where only feasible sales are offered. Utilizing a larger diameter for minimum removal allows for some risk to be taken off of the potential purchaser. Any ability to take risk off of the purchaser is suggested for the success of this project.

Due to the fire burning through an old scar in this project area and poor site conditions in the area, a prominent level of defect exists in this project. Please consider utilizing an MBF scale on this sale, so no less than 1/3 sound wood (useable logs) are removed from the woods. AFRC suggests a DxP on all parts of the project (area salvage and roadside hazards) in order to increase efficiencies and time to market. The Forest Service recently utilized DxP for all of their roadside hazard tree removal from the FY17 fires. The Willamette National Forest worked exceptionally well with purchasers and contractors for a very successful DxP in their roadside hazard units. Due to the Holidays AFRC cannot obtain a copy of this contract at this moment but will get this specific example to you in the coming week.

Logging systems can make or break a sale. AFRC would like the BLM to closely consider and analyze road construction necessary to facilitate conventional logging systems and to minimize helicopter logging. Salvage logs are already compromised in structure and continue to deteriorate as time passes. The likelihood of helicopter logging being an economically viable option is slim to none. AFRC would like the BLM to work closely with us to minimize the likelihood that salvage and hazard tree sales receive no-bids at the auction table. Uneconomic sales offered to the timber industry do nothing to help bolster the economy and move burned landscapes into thriving and lush forests again; only economically feasible sales that sell can do this. Analysis can be completed on a generous proportion of the project area, but when it is time to determine feasibility into sales, please work closely with the industry, your partners, to create successful sales.

Please be extremely specific in the ensuing analysis as to why helicopter logging is the most cost effective method to remove logs from a given stand. A robust economic analysis is vital to ensure a successful sale program.

Tables explaining estimated volume and deterioration within a stand can help identify why helicopter logging is likely to be successful. Lack of restrictions will also allow helicopter logging to be more successful. For instance, a helicopter logged stand that can only be operated on or hauled out in the summer is likely to obtain no bids.

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. Consultation with regulatory agencies for threatened and endangered species often delays the implementation of salvage sales. Therefore, AFRC would like to share a strategy employed by the Rogue River-Siskiyou National Forest in FY18 for the Chetco Bar Fire Hazard Tree Project. The ESA 7(d) provisions were utilized to create an interim direction which allowed the felling of hazard tree where no effect would be made to the NSO. The [first document](#) is a memorandum from the Level 1 team to the Level 2 team while the [second document](#) is specific interim direction from the Fish and Wildlife Service to the Rogue River-Siskiyou National Forest.

Riparian Reserves

AFRC would like to see hazard tree removal efforts within the outer and middle riparian reserves using the inner reserve as a buffer. Treatment in these locations could contribute an increased ability to reforest the burn scar.

Impacts on Carbon Sequestration and Climate Change

Fires release copious amounts of carbon dioxide (CO₂) 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 (consider the outcome of the Timber Rock Fire). 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.

Project Design Feature

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 Butte Falls FO 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 cable assisted 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. This system can be utilized in conjunction with a traditional cable system where the cable assisted machine is utilized to fell the trees and a carriage is utilized to skid the trees to the landing. Few operators in southern Oregon have a forwarder for skidding using the cable assist method and this type of equipment produces a log many purchasers deem as inferior (short log), so a traditional cable system would be optimal on steep slopes for skidding when a cable assist system is utilized for the felling. Please do not write yourself out of using this innovative technology.

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.

Please be very detailed in the methodology of determining logging systems and soils analysis for road building and lack thereof.

AFRC would like to see all roads that were analyzed and the reasons why they are not feasible. We would like to see that they were in fact laid out and reviewed on the ground by engineering, soils, hydrology, etc. staff to be allowed or not allowed to move forward.

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.

Monitoring

Please include some type of monitoring protocol. Things to keep in mind: 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? AFRC feels it is important to keep track of the forest type, developmental stage/seral class, and activities conducted on all of its lands, but especially the Harvest Land Base (HLB). There is clear direction from the 2016 SWO ROD/RMP and the O&C Act related to the treatment of these lands. Monitoring allows for a full picture of the forest through time.

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 and Hazard Tree Removal Project. Should you have any clarifying 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