



December 17, 2018

Scott Hicks
Bureau of Land Management
Grants Pass Field Office
2164 NE Spalding Ave.
Grants Pass, OR 97526

In Reply to: Grave Creek Salvage Project

Dear Mr. Hicks:

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 Grants Pass 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 61,051 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 appreciates the urgency to clear these hazards.

Proposed Action

The CX being utilized allows for up to 250 acres to be salvaged. AFRC is pleased to see the Grants Pass Resource Area proposing all 250 acres of treatment and supports this project. The NEPA document does an excellent job at concisely laying out the management direction for each LUA. AFRC would like to remind the Grants Pass Field

Office what this direction allows in each unit in Table 1. AFRC would like to applaud the Field Office for including this and direction and we look forward to the outcomes of this project.

Table 1

Unit Number	Minimum Retention Basal Area
1	24 ft²/ac
2	9 ft²/ac
3	25.5 ft²/ac
4	18 ft²/ac
5	28.5 ft²/ac
6	22.5 ft²/ac (LITA) 7.5 ft²/ac (UTA)
7	0 ft²/ac
8	8.5 ft²/ac

The Grants Pass Field Office determined that a 40 percent probability of mortality would be utilized for the project and AFRC concurs this probability is appropriate for the location and type of project proposed. AFRC wants to point out that the literature simply “cut-off” analysis at 41.5”, but that shouldn’t mean that a 42” dead tree does not meet the standards for hazard trees or have at least a 40% probability of mortality depending on crown volume killed. AFRC also would like to point out the quote included from Filip et al (2007). Is this simply trying to explain the numbers in Table 6 or is there a different reason it has been included?

Economics

AFRC wants to see every timber sale offered off the Medford District be economically viable. This viability is often a challenge for green timber sales and this challenge is exacerbated when offering salvage timber sales. This year in particular the bug related damage to burnt timber *already* being harvested off of private timber land in the Rogue Valley is impacted to the point where its merchantability is low. Therefore, we strongly urge the BLM to take every precaution available to **limit the amount of extraneous costs** associated with these salvage sales that would decrease their already compromised economic viability. 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. The inclusion of large road packages, small minimum removal specification, complex logging systems and other costs can detract interest in this type of sale. AFRC would like

to point out that the inclusion of “Yarding of Unmerchantable Material (YUM)” in this project is very expensive and should NOT be a requirement. This will only create a more expensive operating situation for any potential purchaser or contractor. AFRC also find it odd that there is a PDF allowing the Authorized Officer to direct the contractor to replace large cull material from the landing back into the unit. Is this due to current low levels of down wood in the units (below the 2% average cover requirement) or for some other reason? This stipulation also provides decreased operating efficiency and risk to the potential purchaser.

Impacts of the Proposed Action 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.

Project Design Feature

AFRC appreciates the inclusion of some flexibility to yarding system determination in the CX. The CX reads “Most often, slope determines whether ground-based or skyline yarding systems would be utilized. Ground-based yarding systems are generally limited to slopes less than 35 percent, and skyline yarding systems are generally used on slopes greater than 35 percent. However, resource buffers, temporary route feasibility, and harvesting feasibility would determine the final yarding systems. Yarding systems will include the use of skyline cable yarding and conventional ground-based yarding.” AFRC would like to see language like this utilized in all BLM NEPA projects. The Siuslaw Field Office of the NW District (Eugene SYU) does not spatially designate required yarding systems in their project maps; instead, they use slope percentage thresholds in their documents as a surrogate to limit certain types of equipment to certain types of terrain. AFRC thinks this type of approach should be used in Medford as well. A recent project where this was employed was the [Wolf Point Project](#) (from the [Long Tom Landscape Plan](#)). As you can see, no yarding is specified spatially on the maps. The Siuslaw Field Office still makes its own logging plan for the appraisal, which indicates how many acres of ground-based, skyline, helicopter, and other yarding methods have been identified internally. AFRC believe it would behoove the Medford District to review this project and utilize this approach in future projects. The Grants Pass Field Office used approximated acres regarding yarding systems which plays into this type of flexibility and AFRC appreciates its use.

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. Thank you for not writing the Grants Pass Field Office out of using this innovative technology.

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. The use of tractor swing routes are not endorsed by AFRC and critical analysis of this type of system should be completed.

Flexible and condition based PDFs allow for better and more opportunities for the land to get treated in a timely fashion. By including a firm operating date or restriction, 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. The Grants Pass Field Office has elected to use general operating dates and situations here a date or a condition would enact a restriction. AFRC is keen on this language and would like to see its continued use or a switch to only condition based restrictions. AFRC does not see it fair to insist on a conditional waiver instead of continued normal operations with shut down for weather through the entire year. Please consider continued monitoring of conditions instead of firm operating shut down dates with waivers or increased/optional road rocking to create all season haul on all roads.

Other Comments

It is important 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.

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