



February 26, 2019

Stephanie Kelleher
Bureau of Land Management
Butte Falls Field Office
3040 Biddle Road
Medford, OR 97504

In Reply to: Ramsey Canyon Fire Salvage Project

Dear Ms. Kelleher:

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 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 Categorical Exclusion (CX) utilized for this project allows for up to 250 acres of salvage treatment. The Butte Falls FO is proposing treatment on a mere 57 acres. The map at the beginning of the document is small and difficult to fully comprehend severity on the BLM land. In the future, we would urge the BLM to create *a larger map with the outline of the BLM land more clearly defined on top of the severity layer*. T34S R02W Sec. 31

seems to have a large patch of high and moderate severity burn within it. Other additional acres seem to provide ideal salvage opportunities as well. ***Please explain why these additional acres would not have helped the BLM meet the Purpose and Need of the project more fully.***

The NEPA document does an excellent job at concisely laying out the management direction for the Harvest Land Base-Uneven-aged Timber Area (HLB-UTA) Land Use Allocation (LUA) and District Designated Reserve-Timber Production Capacity Classification (DDR-TPCC) LUA. AFRC would like to remind the Butte Falls FO what this direction allows in each unit in Table 1 below. AFRC would like to applaud the FO for including this direction and we look forward to the outcomes of this project.

Table 1

Unit Number	Minimum Retention Basal Area
19-1	12 ft²/ac
19-2	11 ft²/ac
19-3	9 ft²/ac
24-1	10 ft²/ac
24-2	10 ft²/ac

The Butte Falls FO 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 Smith and Cluck (2011) literature simply did not analyze trees with a diameter at breast height (DBH) over 41.5”, but that should not indicate that a 42” dead tree does not meet the standards for hazard trees, nor have at least a 40% probability of mortality based on crown volume killed. In addition, on page 4 the NEPA document states, “Selective slashing of material less than 8 inches diameter at breast height (DBH) followed by lop and scatter, and/or hand piling and burning of the cut material would occur where needed to allow for tree planting in salvaged areas.” This seems to imply only those trees greater than 8” DBH are considered mandatory to cut and remove. ***Please clarify if the minimum DBH removal specification is greater than 8” as well as the log length.*** Concurrently, the excerpt above states that material less than 8” DBH may be required to be cut and removed/scattered. ***Please be clear of this in the following contract and appraise for service this work accurately.*** AFRC is in agreement with the BLM over the facility and usefulness to remove dead trees off of the 3 DDR-TPCC acres within unit 19-3.

Economics and Project Design Feature

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 Un-merchantable Material (YUM)” in this project under Appendix 1 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 Project Design Feature (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 or for some other reason?*** This stipulation also provides decreased operating efficiency and risk to the potential purchaser. There are also Activity Fuels Treatment PDF’s. As stated above, adding additional service items to the contract can create disincentive to purchase a salvage sale due to increased risk. ***Will the prescribed burning be completed by the purchaser or the BLM?***

The PDFs identified in the CX strictly restrict ground-based equipment to slopes less than 35%. When developing the timber sale contract for this project, we would like the Butte Falls FO to consider simply using this percent threshold across the sale area rather than spatially designating a particular yarding method. The Siuslaw FO 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. This approach allows operators the flexibility to use the equipment at their disposal in a manner that still meets RMP direction. 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 FO 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 Butte Falls FO 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.

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 favorable, 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 Butte Falls FO has elected to use general operating dates and soil moisture conditions to 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.***

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.

Impacts to the Northern Spotted Owl

The NEPA document states on page 18, “The Ramsey Canyon Salvage Project would remove 14 acres of post-fire foraging (PFF) habitat and modify but maintain the function of 1 acre of NRF habitat and 8 acres of dispersal-only habitat.” The explanation of Post-Fire Foraging (PFF) removal is well written and concise. AFRC appreciates this consideration and the reality of the situation. In contrast, the maintenance of NRF and dispersal-only habitat is perplexing. *Are these 9 acres proposed for any treatment and how were they impacted by the fire? If no proposed treatment is located in them, how can you state that this habitat is being maintained?* On the other hand, if there are 9 acres of treatment within the designated units to be maintained please explain why they must be maintained. We suspect these areas have little to no dead and dying trees in them as they would otherwise be considered PFF. *Please also identify on the map where this habitat maintenance occurs within the proposed units.*

Other Comments

It is important to note that the Smith and Cluck (2011) 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.

Appendix 1 states on page 21, “The Purchaser would make selections based on the following criteria to determine which trees they would not harvest and when to remove excess hardwood material” and then goes on to describe those trees to remove and leave.

Appendix 2 starting on page 24 of the NEPA document is an additional resource that creates some confusion by including it in the document. Appendix A on page 39 of the document is a part of Appendix 2 but does not aid the reader in understanding project specifics. We suggest removing redundancy and confusion by excluding Appendix 2 from the NEPA document.

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.

Thank you for the opportunity to provide scoping comments on the Ramsey Canyon Fire Salvage Project. We look forward to following the implementation of this project as it ensues.

A handwritten signature in black ink, appearing to read 'Amanda Astor', is written over a solid horizontal line.

Amanda Astor

Southwest Oregon Field Forester

[American Forest Resource Council](#)

2300 Oakmont Way Suite 205A

Eugene, OR 97401

Office: 541-342-1892

Cell: 541-517-8573

Fax: 541-342-5492

aastor@amforest.org