



February 11, 2019

Chris McAlear
Acting State Director, Oregon/Washington
1220 SW 3rd Ave, Portland, OR 97204

Dear Director McAlear:

We want to extend our thanks and appreciation to you and your team for the BLM's work during the partial government shutdown to ensure timber sale operations continued. Your team's work during a challenging situation was critical to the forest products industry and the thousands of workers it employs in Western Oregon.

We are also writing to express our strong support for the BLM's Fiscal Year 2019 (FY19) timber target of **278 MMBF**. This increase is not only a significant step toward full implementation of the RMPs for the O&C Lands, it is also necessary to support and create jobs, generate revenue for essential government services, and provide renewable materials to manufacture affordable, sustainable, and local wood products.

The Oregon Forest Resources Institute estimates every one million board feet of timber harvested sustains or creates 11 direct jobs.¹ If the BLM successfully achieves its FY19 timber target, the agency could help create 1,130 *more* jobs than in FY18.² At an average stumpage price of \$300/MBF, achieving its FY19 timber target could generate \$42 million for essential services in 18 Western Oregon counties such as public safety, mental health, libraries, and search and rescue (in addition to \$42 million for the U.S. Treasury).³ In other words, achieving the BLM's FY19 timber target would provide significant and tangible economic impacts throughout Western Oregon.

We understand accomplishing (awarding) 278 MMBF with flat funding will require the BLM to address existing administrative roadblocks. AFRC and its members appreciate the agency's past and ongoing efforts to streamline the Protest process that consumes valuable personnel time and limited financial resources. While regulatory changes are pending, we urge the State Office to assist District staff in meeting a state-wide policy of responding to all protests within 45 days of sale advertisement by addressing only valid protest points that present potential analysis or legal deficiencies (as opposed to every ideological protest point).

The BLM can also adopt certain management practices and capitalize on efficiencies to achieve the 278 MMBF target consistent with the RMPs and without substantial increases in funding or staff. We respectfully request the State Office take the following actions:

¹ Oregon Forest Resources Institute, "Facts About Oregon's Forests." Found online at: <https://www.oregonforests.org/forest-facts-figures>

² The BLM sold 175.3 MMBF in FY18, supporting 1,928 jobs (175*11 jobs = 1,928 jobs). Achieving the 278 MMBF level would sustain or create 3,058 jobs (278 * 11 jobs = 3,058 jobs).

³ \$300/MBF * 278,000 MBF = \$83.4 million. By statute, 50% of receipts go to the O&C Counties and 50% go to the U.S. Treasury.

- Prioritize treatments in the Harvest Land Base (HLB) within the highest volume stands, consistent with the sustained yield harvest scheduling model.
 - o In Southwest Oregon alone, the BLM is expected to commercially treat 19,988 acres of stands over 120 years old in the first decade. To date, only 1,108 (5%) of those stands have been treated. The simplest way to increase timber outputs is to focus management on stands capable of yielding the highest volume per acre. Directing the Southwest Districts to prioritize treatment of the remaining 18,880 acres would help achieve this.
 - o The vegetation models direct the Northwest Districts to regenerate more acres over 80 years old than acres less than 80 years old (15,642 vs. 14,351) in the first decade. To date, the Northwest Districts have implemented 553 acres of regeneration harvest in stands less than 80 and only 112 acres in stands over 80. Reversing this trend would immediately increase timber outputs across the same number of treated acres.

- In Southwest Oregon, maximize treatment *intensity* on every acre of land allocated as Uneven-aged Timber Area (UTA). The 2016 RMPs permit the BLM to treat stands identified as UTA to a residual density range of 20% to 45%. Until the Medford District can reliably achieve its ASQ, the District should be directed to treat 100% of the available UTA stands to 20% residual density. This would immediately increase the timber outputs across the same acreage treated.

- Treat Late Successional Reserves (LSRs), riparian reserves, and other reserves to the maximum extent allowed under the Northwest RMP.

- Treat LSRs to the maximum extent *required* under the Southwest Oregon RMP. The South River Field Office is required to treat at least 4,500 acres of LSR per decade. The Medford District is required to treat at least 17,000 acres of LSR per decade. To date, only 36 such acres have been treated.

- Adopt a state-wide policy not to defer treatment of any acres except to avoid incidental-take of Northern Spotted Owls, prevent resource damage, or avoid excessively high logging costs.

- Maximize analytical “tiering” to the RMP to reduce the size and timeline of NEPA documents.

- Strive to maximize acres analyzed under each NEPA document. The Siuslaw Field Office recently initiated an EA called N126 LSR that aims to treat 33,000 acres of LSR in a single NEPA document. The State Office should require all Field Offices to mimic this approach. Doing so would immediately reduce the unit-cost of NEPA analysis.

Again, thank you to you and your team for the BLM’s important work during the partial government shutdown. As the State Office works to achieve its increased FY19 timber target, please consider AFRC and its members a constructive partner and resource ready to offer our assistance, expertise, and support.

Sincerely,



Travis Joseph
President, AFRC