



February 28, 2019

Paul Tigan, Field Manager
Bureau of Land Management
Northwest Oregon District, Mary's Peak Field Office
1717 Fabry Rd
Salem, OR 97306

In Reply To: Wild Goose EA

Dear Mr. Tigan:

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 Mary's Peak 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 61,000 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 has been advocating for **sustainable timber management** on O&C Lands for well over a decade. Our membership depends on a BLM timber program that is designed to sustain itself into the future. O&C Lands are required by law to be managed for "permanent forest production." While we do not agree that the current RMPs actually

meets this mandate, proper implementation of the plan's timber harvest levels is a necessary step toward meeting the Act's requirements.

We have expressed our concerns with how the past management paradigm under the Northwest Forest Plan (NWFP) of exclusive thinning impacted BLM's ability to achieve this long-term sustainability. When the NWFP was conceived in 1994, BLM assured the public that the timber resources on O&C Lands would be managed based on the principles of sustained yield. This assurance was based on a carefully crafted harvest plan that included both regeneration and thinning treatments directed by a detailed modeling effort. Those models, and particularly the regeneration harvest that form the underpinning of long term sustainability, were largely ignored during the 20 years following completion of the plan—regeneration harvest was deferred in favor of a management scheme based solely on thinning.

The BLM recognized these facts in a 2012 RMP Evaluation Report on the implementation of what then was their current Resource Management Plan (RMP). Among other findings, this report led the BLM to the following two realizations:

- The determination of the ASQ is based upon an assumed; mix, intensity and cycle of regeneration and thinning harvest. Adherence to the principles of sustained yield, at the declared ASQ harvest level, is based on implementation of these assumptions.
- Accelerated rates of thinning without replenishment of younger forest stands through regeneration harvest means that opportunities for thinning will eventually be exhausted. The current approach to a forest management regime that deviates so considerably from the RMP assumptions used in determination of the ASQ is **not sustainable** at the declared ASQ level.

A similar modeling effort was completed for the 2016 RMPs, published by BLM last summer. Once again, BLM assured that their timber resources would be managed based on the principles of sustained yield as directed by the O&C Act, and this assurance was once again supported by a carefully crafted set of models that included a combination of regeneration harvest and thinning. AFRC wants to ensure that the implementation failures of the Northwest Forest Plan described above are not replicated under the current RMP. **A failure to implement would be characterized by BLM ignoring the sustained yield models and proposing treatments in conflict with those models, thus leading to an unsustainable management scheme.**

Achieving an ASQ that is sustainable in the long-term is vitally important to AFRC and its membership and it will take a deliberate approach by BLM to managing the Harvestable Land Base (HLB) to make it happen. This deliberate approach will

require a major paradigm shift from how the BLM managed its O&C Lands over the past twenty years. **We need the BLM to distinguish between “offering ASQ volume” and “managing timber resources consistent with the principles of sustained-yield.”**

These two are **NOT** the same. The BLM “offered ASQ volume” since 1994—but as your 2012 RMP Evaluation Report noted, you were not managing sustainably.

In our scoping comments for the Wild Goose project, we highlighted these points and included a copy of the table compiled from BLM source databases used in the modeling for the Proposed Resource Management Plan (PRMP), which is copied below. We emphasized that **the ASQ for the Salem Sustained Yield Unit (SYU) is only sustainable if these models are followed as closely as possible.**

Salem SYU

HMP Desc	Age Grp 2013	First Decade	First Decade
		Regen	Thinning
Mod Intensity	2) 40-70	5,312	6,273
	3) 80-110	5,127	35
	4) 120-150	626	
	5) 160-190	38	
	6) 200+	19	
Total Mod Intensity		11,122	6,308

HMP Desc	Age Grp 2013	First Decade	First Decade
		Regen	Thinning
Low Intensity	2) 40-70	545	910
	3) 80-110	429	
	4) 120-150	130	
Total Low Intensity		1,104	910

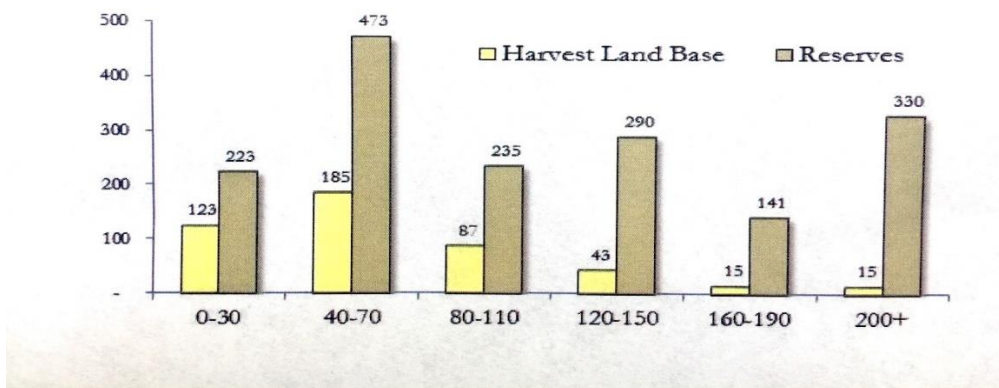
We are disappointed that the Mary’s Peak Field Office opted to not recognize the importance that this modeling effort has toward managing timber resources sustainably in the Wild Goose EA. The EA clearly identifies that the “need” for action is the need to meet management direction for sustained-yield timber production, yet it does not identify the **calculated path that will lead to this sustainable production.** Fortunately, perhaps by accident, both alternatives created for this project comply with the modeling calculations illustrated above. However, we would like to remind the Mary’s Peak Field Office that both the Tillamook and Cascade FO’s are also contributing to the SYU’s HLB requirements through their own active management. This warrants attention to these projects to ensure that all three FO’s in the SYU do not *collectively* conflict with the

modeling results. In other words, if alternative 2 is fully implemented in 2019, the SYU will have achieved 519 of the required 545 acres of regeneration harvest in stands in the 40-70 year age group in the LITA. However, if the Tillamook or Cascades FO's also implement 50 acres of similar regen harvest in this age group in the LITA in 2019, then the SYU as a whole has managed its HLB in conflict with the vegetation models and in conflict with RMP direction to “manage forest stands to achieve continual timber production that can be sustained through a balance of growth and harvest.”

AFRC would like to remind the Mary's Peak Resource Area that management direction and land use allocations in the 2016 NWO ROD/RMP are intended to constitute the BLM's contributions to the recovery of the northern spotted owl. The ROD explicitly describes how this direction does so on pages 22-24. In summary, the ROD describes this contribution via: **a.) maintenance of a network of large blocks of forest to be managed for late-successional forests; b.) maintenance of older and more structurally-complex multi-layered conifer forests; c.) timber harvest in the HLB consistent with the concepts of Ecological Forestry, and d.) mitigation of the effects of the barred owl by avoiding the incidental take of NSO's until implementation of a barred owl management program.** In other words, the fact that the BLM adopted the liberal designation of 80% of the O&C Lands into reserves, including nearly *all* of the older stands (see table below), along with “lighter-touch” silvicultural prescriptions in the HLB should allow for implementation of sustained-yield timber management on remaining O&C Lands in the HLB unencumbered by NSO concerns. Incidental take avoidance should be the *only reason* why treatments in the HLB get deferred for NSO considerations.

Western Oregon - Age Class and Allocations

Graphic 1 – 2,162,000 Forested Acres – (1,000s)



The Wild Goose EA is not explicit in the fact that the adaptive management approach and subsequent treatment modifications are being designed to avoid incidental take or for other reasons. We hope to gain clarity on this in the future. For the purpose of these comments, we are assuming that the BLM is using this approach to avoid incidental take.

The EA clearly describes the BLM's analysis of NSO habitat at the site scale. Such a scale is appropriate for incidental take assessments. However, we are confused regarding the inclusion of dispersal habitat at the site scale described on pages 21-22 of the Wild Goose EA for assessment of site productivity. An **Information Bulletin** dated July 21, 2017 was sent to the District Managers of each BLM District managing under the 2016 RMPs. This bulletin was titled "*Timber sale planning approaches to avoid take of northern spotted owls under the 2016 RMPs.*" Appendix 2 of this bulletin titled "Evaluation of Take Potential" includes guidance on how to assess incidental take. Page 1-16 of this Appendix reads that the best available science indicates that forest habitat needs of the owl should be assessed at the core and home-ranges scales. Specifically, that literature has demonstrated the "*importance of having sufficient amounts of NRF habitat within owl core areas*" and that "*populations are stable when the average proportion of NRF habitat in the home range is 30-50%.*" Nowhere in this document is there any guidance or scientific literature that suggests the home-range and core area as adequate scales for assessing needs of dispersal habitat. In fact, on the contrary, page 1-19 of this bulletin suggests that "*the effects analysis for owl dispersal habitat considerations is informed by **landscape conditions**, as suggested by Thomas et al. (1990) along with Lint et al. (2005) and Davis et al. (2016).*" More specifically this page goes on to read that "*as assessment of dispersal habitat condition was recommended on the quarter-township scale by Thomas et al. (1990)*" and that "*the U.S. Fish and Wildlife Service has subsequently used fifth-field watersheds or larger landscapes for assessing dispersal habitat conditions because watersheds or provinces offer a more biological meaningful way to conduct the analysis.*" Page 21 of the Wild Goose EA reads that "habitat conditions in the vicinity of each NSO site is assessed by evaluating suitable and dispersal habitat conditions: provincial home range, core area, and nest patch." Based on the above referenced Information Bulletin, this type of scale is inappropriate for dispersal habitat assessments.

AFRC can find no analysis in the Wild Goose EA that reflects any of this guidance on how to assess dispersal habitat needs in the context of NSO take avoidance. It seems the BLM was clearly assessing the need to maintain dispersal habitat in the context of the core area and home range rather than the landscape and/or fifth-field watershed scale as suggested by the best available science and recommendations by the U.S. Fish and Wildlife Service. ***We would like an explanation from the BLM that***

describes the analytical and scientifically-based process used to determine that any analyzed units would warrant “dispersal-maintain” treatments in order to avoid incidental take of NSOs.

In addition to adhering to the vegetation modeling described in the PRMP/FEIS AFRC believes it is critically important that the BLM closely adheres to the other design features described in this document that impact how the HLB will be managed for sustained yield timber production. One such design feature is the North Oregon Coast Distinct Population Segment of the Red Tree Vole. The direction on how to manage for this resource is described on page 101 of the NCO ROD/RMP. Here, the RMP provides scenarios that exempt the BLM from conducting pre-disturbance surveys for the RTV. One of these scenarios is “projects in stands less than 80 years old.” According to the EA, every stand proposed for treatment in the Wild Goose EA is less than 80 years old and, accordingly, are exempt from RTV surveys. However, based on Table 3-7 in the EA, the BLM opted to survey nearly 100 acres of stands less than 80 years old. **AFRC would like an explanation of why this RMP direction on RTV management appears to have been ignored and costly surveys that resulted in the deferral of management in the HLB resulted.**

In our scoping comments we urged the BLM to consider density management treatments in the project’s riparian reserve areas. Based on our site visits, it was clear that the stand conditions that exist in the uplands were also largely present in the riparian reserves. Those stand conditions are described in the EA on page 13 appropriately as being in the “stem exclusion” phase of development. It is in this phase of development where density management treatments are particularly effective, making the BLM’s decision to defer any such treatments in the riparian reserve perplexing. The language on the bottom of page 12 of the EA seems to indicate that the BLM “considered density management in the riparian reserves” but then “refined the Purpose and Need of the project” to focus solely on ASQ volume. Our interpretation of this explanation is that the BLM “tweaked” their Purpose and Need in a way that excluded *consideration* of treatment in riparian reserves rather than assessing the conditions of the stands in the riparian reserves and treating accordingly. If so, this tactic is extremely troubling to AFRC and represents a negligent approach to management. Either the stands in the riparian reserve need treatment or they do not. Instead of allowing professional BLM foresters, silviculturists, and wildlife biologists to make these stand-by-stand assessments, it seems the BLM sidestepped it by narrowing their purpose and need.

The timber products provided by BLM are crucial to the health of our membership. Without the raw material sold by 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 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 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 EAs and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like 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 Northwest BLM market area with a variety of skills and equipment. Developing a 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 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.

Constructing forest roads is essential if active management is desired, and we are glad that 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 and not, and we are glad BLM is working to accommodate this.

AFRC is happy to be involved in the planning and decision-making process for the Wild Goose EA. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or ageissler@amforest.org.

Sincerely,

Andy Geissler
Federal Timber Program Director
American Forest Resource Council