



March 13, 2019

Glenn R. Harkleroad; Field Manager
Bureau of Land Management
Coos Bay District–Umpqua Field Office
1300 Airport Lane
North Bend, OR 97459

In Reply to: West Fork Smith River EA Document

Dear Mr. Harkleroad:

Introduction

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the West Fork Smith River Project (WFSR).

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 Umpqua 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 significant 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.

Tiering

AFRC assumes tiering to the 2016 PRMP/FEIS wherever possible occurs during the preparation of NEPA Documents in order to increase analysis efficiencies. AFRC would like to provide an example of good language from the Medford BLM District on this topic. The [Griffin](#)

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[Half Moon EA](#) on the Ashland Field Office describes tiering on page 11, “This document and the effects analysis tier to the 2016 PRMP/FEIS for Western Oregon. Tiering refers to using the coverage of general matters in broader NEPA documents in subsequent narrower NEPA documents. Tiering allows agencies to narrow the range of alternatives, narrow the scope of analysis, and reach a Finding of No Significant Impact for an action that may otherwise potentially have significant impacts. Where issue has already been sufficiently addressed by the analysis in the 2016 PRMP/FEIS, the issue is generally not addressed in detail in this EA, or if it is, the EA analysis is generally a site-specific extension of the FEIS analysis.” *AFRC would like the FO to include this type of language in future NEPA documents.*

Purpose and Need

AFRC is glad to see the FO proposing vegetation management on their Late Successional Reserve (LSR) lands that will likely provide useful timber products to our membership. Our members depend on a predictable and economical supply of timber products off BLM land to run their businesses and to provide useful wood products to the American public. The treatments on the WFSR Project will likely provide short-term products for the local industry and we want to ensure that this provision is an important consideration for the decisionmaker as the project progresses. As we will discuss later in this letter the importance of our members’ ability to harvest and remove these timber products from the timber sales generated off this project is paramount. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on BLM land including LSR. Timber by-products generated from active management of LSR land contribute to the non-ASQ volume of a Sustained Yield Unit (SYU). Non-ASQ volume is important to AFRC’s members because it assists the District in attaining its assigned timber target each year while also achieving RMP guidance on accelerating the development of late successional forests. Without active management on LSR lands, the District is likely to underachieve on their timber target as well as prohibiting the District from attaining the expedited development of late-seral forest conditions. The WFSR Project will provide the non-ASQ portion of the Coos Bay BLM target for at least 2 years.

The Need of the project focuses in on stands between 40-60 years old. Stands of any age may lack high quality nesting structure and composition due to lack of management or poor management in the past. *Please explain why the FO only considered stands between 40-60 years old.*

Active management in the Outer Zone Riparian Reserves (RR) is something AFRC has been advocating for. We are excited to see so much included in this project. Based on our site visits, it was clear that the stand conditions that exist in the uplands were also largely present in the RRs. Those stand conditions are described as being in the “stem exclusion” phase of development. It is in this phase of development where density management treatments are particularly effective. Thank you for including RR management in this project.

Silviculture and T&E Species

The primary driver of this project, as it's written in the EA, is to reestablish forest structure characteristics needed by the northern spotted owl (NSO) and marbled murrelet (MAMU). AFRC appreciates the use of proportional thinning, variable density thinning, and gap creation. The explanation for relatively large (4 acres) gap sizes is exceptional and provides a great deal of information surrounding gaps larger than 1.5 acres. AFRC appreciates the creation of gaps up to 4 acres in size and the use of variable density thinning. We believe these treatments will help create more horizontally diverse landscapes. The inclusion of proportional thinning throughout all diameter and height classes will create the vertical diversity and multistoried stand characteristics necessary in Douglas fir LSR stands.

The BLM is proposing treatment resulting in average relative densities (RDs) between 20 and 45 percent with a target RD of 33 percent. Currently RDs fall between 49 and 89 percent. The average post-harvest RD is estimated at 35.5 percent based on Table 2-11 on page 24 of the EA. Table H-1 on page 154 of the EA, shows an estimated post-treatment RD of 33.2 for all of the units. Generally, both of these tables show different information. ***Please help us understand which table is more accurate.*** If Table 2-11 is correct, there is also an issue with Unit 12's RD of 52 percent post treatment. This is outside of the range of allowable RDs following treatment and does not follow RMP Direction to thin to a RD of 20 to 45 percent. Unit 30 and 31 also fall within the 40's for their post-harvest RD percent. There is not a single unit that falls within the 20's for their post-harvest RD percent to offset these higher RDs. ***AFRC would like to know why these three units required a higher RD outcome while no units required or could have a lower RD.***

In the LSR there is a requirement for and increased amount of large down woody debris and standing snags than most of these units currently have. AFRC appreciates the consideration of logging damage, broken tops, slash pile scorch, and wind damage towards snag recruitment and down woody material. This is common sense management that we value and respect it being included in the NEPA document and analysis.

Tree tipping is another aspect to this project. AFRC suggests tree tipping in RR's be from the Inner Zone where it is most likely to naturally occur. These trees can come from any RR Zone as stated in the EA on page 9, "[m]anagement direction for the RR also specifies that the cut or tipped trees (preferably conifers) would be of any size and come from any zone." Please do not take away trees from a RR Outer Zone that could otherwise be harvested and sold in timber sales from which the profits directly benefit Oregon's O&C Counties.

Wildlife Issue 1 starts out describing nesting and roosting stands on page 56-57 of the EA, but then identifies mapped habitat categories as nesting, roosting-foraging, dispersal-only, and non-habitat. We understand that nesting and roosting habitat is very similar, so why then is

roosting and foraging habitat combined? These two habitat types are not always similar based on the relevant science. Page 64 of the RMP describes the Management Objectives of LSR land. Maintenance and development of nesting-roosting NSO habitat is one of the main Objectives followed by promotion of development and maintenance of foraging NSO habitat falls under a separate Management Objective. ***Why is the corporate data split into nesting and roosting-foraging categories instead of nesting-roosting and foraging categories to be in line with the RMP?*** In addition, conditions for owls are site specific, so ***why did the BLM analyze habitat creation and development off of one unit (EA unit 15)?*** We believe they should have been assessed on a site by site basis, not a blanket judgement.

Economics and Operating Restrictions

The timber products provided by the BLM are crucial to the health of our membership and local economy. 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. The Swanson Group sawmill in Glendale recently shut down due to this exact problem. It was surrounded by federal forestland, yet there was not enough wood provided by them on the market for the mill to stay open. The positive benefits from a sustainable program 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. Logging contractors must average 10 months of work per year in order to be profitable. To be clear, we are advocating that you consider the economic viability of the project and make sure that it is designed in a way that makes sense for the market. This is not the same thing as maximizing economic value of the project.

Accurate cruise information allows for higher bidder confidence when at the auction table. AFRC is happy to see sample tree falling in this project to obtain more accurate cruising information. Thank you for taking steps to create more accurate volume estimations.

There are a variety of operators that work in the BLM market area with a variety of skills and equipment. Developing a Decision 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. 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 proposed area is planned for cable harvest, there

are opportunities to use certain ground equipment such as feller bunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and feller bunchers 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 General Harvest Operations PDFs discuss a magnitude of criteria for allowable harvesting. Numbers 12, 14, 19, and 22 all use the word require/d. In most cases required actions are used in conjunction with “when feasible”. Please consider removing the word required and substituting it with the following: 12- “required” changed to “utilized”, 14- “would be required to” changed to “should”, 19- “required” changed to “needed”, and 22- “require” changed to “have”. By making these changes the BLM creates flexibility and decreases risk for potential purchasers associated with the timber sales contained in this project area. AFRC would also like to point out that the logging plan was created through LiDAR and not through on-the-ground reconnaissance. We appreciate the use of “approximate” locations and understanding that yarding system design will be finalized in the Exhibit A of timber sale contracts and that it is likely to be different in system, acres, and locations than specified in the EA. We assume number 23 refers to specialized ground-based equipment or tether assisted equipment that would be permitted on slopes over 35%. Thank you for including this allowance and now writing the BLM out of this innovative technology. The identification of BMP-TH 13 and BMP-TH 14 coincide with the language in number 23. This flexibility is important and allows increased interest in federal projects. Please also include language in the General Harvest Operations PDFs section that follows with BMP-TH14, allowing specialized ground-based equipment on slopes up to 50%.

We recommend phrasing the language in this and future NEPA document to focus on desired end results for soil conditions rather than prescribing the type of equipment necessary to meet those conditions. This method is utilized by the NOW BLM District’s Siuslaw FO. Their latest timber sale, [Wolf Point](#), is one example of how this method shows up in a contract. The Exhibit A maps do not spatially locate any logging systems.

Please include language such as “Yarding may occur outside of the unit to allow for access to the unit. Final yarding implementation will be reviewed and approved by the Sale Administrator.” This language allows for certainty of yarding flexibility at the time of timber sale implementation as well.

AFRC asks that the cost and economic risk associated with prescribed fire and fuels reduction treatments be accurately assessed. Burn windows are not always guaranteed and can provide additional risk. Therefore, we strongly urge the BLM to take every precaution available to limit the amount of extraneous costs associated with these sales. Under the fuels treatment PDFs (#9), debris and other slashed vegetation between ½ inch to 4 inches in diameter would be hand-piled.

AFRC would like to know how material between 4 inches and merchantability specifications will be handled if not within the burn piles?

Roads

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 and not, and we are glad the BLM is working to accommodate this by proposing rock application to roads that include cable yarding systems.

Table 2-4 on page 16 of the EA identifies and defines activity restrictions for operations. Construction of new roads (without stream crossings): renovation and improvement of existing roads as well as hauling on natural-surface roads both allow for extended operating seasons based on weather. If the weather creates inoperable conditions at the end of the season and at the beginning of the season, but conditions in the middle of the off season are operable, ***will waivers be available to operate at that time?*** AFRC believes operating conditions should be reviewed when requested by the purchaser and approved if they fall within the allowable operating conditions no matter the date. This type of change will allow for increased flexibility and timeliness for purchaser to achieve management goals. Flexibility in road work was also identified in the EA. The BLM states on page 10 of the EA that additional spur roads may be necessary for access into some units. All of the road mileage is estimated and will not be finalized until the timber sale decision. Thank you for disclosing this strategy and allowing adaptability in the project for on-the-ground findings as implementation and pre-sale work carries forward.

Monitoring

AFRC recognizes all the demanding work put into completing NEPA. Therefore, we would like to see a detailed monitoring methodology for implementation and post implementation (pre-sale and post cut-out). It is not always clear if and how all the arduous work on the front end is coming to fruition. It is paramount quality control occurs. If site specific prescriptions are not written correctly or if those prescriptions are not implemented correctly, then all the work put into the NEPA is moot.

Other Comments

Thank you for including the reasons why acres were dropped between scoping and EA. Table 1-2 on page 2 outlines these reasons. We are having a tough time understanding the table though.

The numbers do not seem to add up. *Could the BLM please provide an explanation in the final EA on how to read the table.*

AFRC appreciates the concise and issue based document, but we believe economics at the project level are valid to analyze rather than tiering them to the RMP. *In future documents AFRC would like to see project level socioeconomics addressed similarly to the below examples from the US Forest Service.*

1. [Lowell County EA](#) – Willamette National Forest (Economics, pg. 173-178)
 - AFRC believes this analysis includes most of the key factors of a thoughtful economic analysis, but not all of them. Those included are:
 - Log prices
 - Agency Costs
 - Estimated Volume and Profit
2. [Chetco Bar Fire Salvage EA](#) – Rogue River-Siskiyou National Forest (Economics, pg. 3-61 to 3-65)
 - This analysis covers a few main topics, but what AFRC appreciates the most is the table below (pg. 3-64). This table allows AFRC to develop a better understanding for how the Agency developed its final cost and profit values. Without this information it is difficult for AFRC to help the Agency more accurately determine the net return of a project.

Table 17. Costs for Determining Project Revenue.

Zone Averages Costs per Mbf	\$/Mbf
Tractor Logging - Stump to Truck	\$187
Skyline Logging - Stump to Truck	\$245
Helicopter Logging – Stump to Truck	\$400
Haul Costs	\$87
Road Maintenance	\$26
Road Reconstruction	\$25
Brush Disposal	\$9
Other Contract Costs	\$11

3. [Black Torch EA](#) – Chequamegon-Nicolet National Forest (Socioeconomics, pg. 123-133)
 - AFRC likes the use of these 5 distinct Economic Indicators to analyze the socioeconomic effects of the project. They provide solid metrics to compare the different alternatives.
 - Twenty Five Percent Fund, Payment in Lieu of Taxes Act of 1976, Secure Rural Schools and Community Self-Determination Act of 2000
 - Employment
 - Income Generated
 - Harvest Volume
 - Potential Biomass Harvest

4. [Shores EA](#) – Hiawatha National Forest (Economics, pg. 134-136)
 - The acknowledgment that costs outweigh profit of the project is key in this analysis. AFRC would like to point out that the acres/volume in a sale effect the overall return on investment in a project. Had this project included more acres or if more volume per acre was removed, this project may have had a net positive return (even in a downturned market). Understanding the reason for a net negative return is important and an economic analysis can help determine the factors for this return.

5. [Niagara EIS](#) – Hiawatha National Forest (Financial and Economic Efficiency Analysis, pg. 128)
 - AFRC appreciates the use of a very simple and easy to understand table.

Table 28. Comparison of Estimated Tangible Costs & Returns for the Niagara Project.

	Proposed Action	No Action	Alt. 1	Alt. 2
ESTIMATED COST				
Timber sale preparation & admin	(\$291,400)	\$0	(\$150,400)	(\$413,600)
Handtool site preparation for natural	(\$10,313)	\$0	(\$4,181)	(\$14,618)
Mechanical site preparation for natural	(\$14,111)	\$0	(\$10,005)	(\$14,111)
Full plant	(\$43,800)	\$0	(\$31,000)	(\$31,000)
Regeneration survival checks	(\$15,529)	\$0	(\$7,358)	(\$22,008)
New system road construction	(\$51,336)	\$0	(\$41,540)	(\$51,336)
Temporary road construction	(\$14,921)	\$0	(\$12,529)	(\$14,921)
Close existing roads	(\$6,900)	\$0	(\$6,900)	(\$6,900)
Decommission roads	(\$15,773)	\$0	(\$15,773)	(\$15,773)
Construct log landings	(\$5,562)	\$0	(\$5,464)	(\$5,562)
TOTAL COSTS	(\$469,645)	\$0	(\$285,149)	(\$589,827)
ESTIMATED RETURNS				
Volume	12.4 MMBF	0	6.4MMBF	17.6MMBF
Volume (07/07 monetary value)	\$636,368	\$0	\$317,564	\$938,492
25% return to counties	(\$159,092)	\$0	(\$79,391)	(\$234,623)
10% return to roads & trails fund	(\$63,637)	\$0	(\$31,756)	(\$93,849)
TOTAL RETURNS TO TREASURY	(\$56,006)	\$0	(\$78,735)	\$20,193

Thank you for the opportunity to provide EA comments on the WFSR Project. AFRC is impressed with the organization of this EA document and the flexibility worked into it. We look forward to following the implementation of this project as it moves forward. If you have any clarifying questions, please feel free to follow up with us using the contact information below.



Amanda Astor
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