



April 8, 2019

Michael Korn
Bureau of Land Management
Roseburg District Office
777 NW Garden Valley Blvd
Roseburg, OR 97471

In Reply to: Deadman's Folley Harvest Plan Scoping Letter

Dear Mr. Korn:

The American Forest Resource Council (AFRC) has previously comment on the scoping effort for the Deadman's Folley Harvest Plan. This letter is meant to add additional comments to the revised scoping letter proposing the addition of salvage and additional fuels treatments to the project.

AFRC supports the inclusion of salvage and additional fuels operations in the Deadman's Folley Project. We ask that flexibility is incorporated into the NEPA document so that additional acres can be treated as salvage. Lack of access to complete reconnaissance created a situation where this flexibility is paramount for success (See Figure 1). Consider the economic and safety ramification of this project and the included storm damage. With multiple binds and the inability to accurately measure downed trees, intangible risks exist in this project outside of normal circumstances. Additional logging and yarding time will be necessary to safely handle the material in many of the proposed units. Some of the units were previously marked prior to the storm. Some trees that were marked to be left as retention, boundaries, etc. have now fallen over or have broken due to storm damage. Please make these trees available for salvage harvest. Harvesting these trees may be necessary for safe operation, decreasing fuel build up, as well as decreasing food for insidious forest pests.



Figure 1 - Storm Damage that looks like a thinned stand in the Deadman's Folley Project Area.



Figure 2 - Unit 9B looking through the unit into the Riparian Reserve.



Figure 3 - Unit 5A looking into the Riparian Reserve.

Additionally, much of the storm damaged trees exist in the Riparian Reserve (See Figures 2 & 3). Please analyze the affects of this increased down wood into the reserves and determine if it can be removed through a timber sale. AFRC believes some of the project area’s reserves are likely in excess of down woody needs (See Figure 3) and should be allowed for removal. By removing the excess down woody material, the BLM is likely to enhance the habitat, growth potential for the standing trees, and decrease fuel build-up decreasing the likelihood of severe fire damage. These trees were already under analysis for removal and should be allowed to be removed from the Outer Zones.

Please consider the issue of future stand health and vigor when designing silvicultural prescriptions in stands that experienced any level of storm damage. In particular, we would like the BLM to analyze the likelihood of success for residual trees within damaged stands and subsequently consider maximum regeneration at the lowest mandatory retention level in order to completely start these stands over with a level of retention trees capable of living through another stand rotation. We also recommend that you identify any unit with salvage needs as a “salvage unit” as opposed to a “regeneration unit” in order to put the stand on the best trajectory for future success by adequately utilizing the salvage unit management direction (See Figure 4).

Ample bare soil conditions exist due to the damage and will assist in effective establishment of a new cohort of trees although additional site preparation may be necessary. Trees that were not damaged were likely heavily stressed creating a more difficult and unlikely successful future. Those trees may



Figure 4 - Unit 9B with primarily only Leave Trees still standing.

also need to be removed for safety concerns. One of the Harvest Land Base (HLB) Management Objectives is to “[r]ecover economic value from timber following disturbances, such as fires, windstorms, disease, or insect infestations” (NCO ROD/RMP, pg. 59). The key to success and adequate following of the RMP is to conduct salvage **only** “where the BLM determines that removal is economically viable” (NCO ROD/RMP, pg. 62-63). During reconnaissance, AFRC and its members can always help determine accurate assessments of economic viability. Along these lines, removal specs should also be flexible because lengths are likely to be suboptimal where breakage occurred. The ability to leave some wood can create some balancing of the risk but will not remove it.

Generally, AFRC supports the inclusion of salvage operations and additional fuels treatment in the Deadman’s Folley Project with the inclusion and analysis of the issues raised above. 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 defensible NEPA document.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision-making process for the Deadman’s Folley EA. 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,

A handwritten signature in black ink, appearing to read 'Amanda Astor', with a stylized flourish at the end.

Amanda Astor
Southwestern Oregon Field Forester
American Forest Resource Council