



June 27, 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 Environmental Analysis and DRAFT Finding of No Significant Impact (FONSI)

Dear Mr. Korn:

**Introduction**

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Deadman's Folley Project. These comments are in response to the Draft FONSI and the EA as it is referenced in the FONSI.

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 Swiftwater Field Office (SFO), 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.

## O&C Lands and Models

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. We have expressed our concerns with how the past management paradigm under the Northwest Forest Plan of exclusive thinning impacted the BLM's ability to achieve this sustainability. When that plan was conceived in 1994, the 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 detailed modeling effort. Those models, and particularly the regeneration harvest, 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. A similar modeling effort was completed again for the 2016 RMP's. Once again, the 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 the BLM ignoring the sustained yield models and proposing treatments in conflict with those models.

The BLM recognized this fact 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 these well documented implementation failures of the Northwest Forest Plan validated in the 2012 RMP Evaluation Report are not replicated under the current RMP.

Table 1: RMP EIS Model Outputs

Roseburg SYU			
	Age Group 2013	First Decade	
		Regen	Thinning
LITA	1) 0-30		
	2) 40-70	625	4,404
	3) 80-110	1,266	180
	4) 120-150	995	
Total	5) 160-190	7	
	6) 200+	126	
		<b>3,020</b>	<b>4,584</b>

Table 2: Treated acres including unit 25-2-19A from the Third Rock EA and all of the Deadman's Folley units

LITA Acres Treated		
Age Group 2013	Regen	Thinning
1) 0-30		
2) 40-70	1757	116
3) 80-110		
4) 120-150		
5) 160-190		
6) 200+		
Total	1757	116

Table 3: Percent of decadal treatment acres attained including unit 25-2-19A from the Third Rock EA and all of the Deadman's Folley units

LITA Treatment Percent Attained		
Age Group 2013	Regen	Thinning
1) 0-30		
2) 40-70	281.12%	2.63%
3) 80-110	0.00%	0.00%
4) 120-150	0.00%	
5) 160-190	0.00%	
6) 200+	0.00%	
Total	58.18%	2.53%

In our scoping comments we included a table with similar data shown in Table 1 above compiled from BLM source databases used in the modeling for the Proposed Resource Management Plan (PRMP). As we stated above, BLM's requirement to manage their lands under the principles of sustained yield can only be met if the implementation of the plan adheres to what was modeled. These modeled numbers were also integral to calculating each District's Allowable Sale Quantity (ASQ). **The ASQ for the Roseburg SYU is only sustainable if these models are followed as closely as possible.** For example, if the Roseburg SYU fails to implement 1,266 acres of regeneration harvest in stands in the 80-110-year age group in the first decade, then the District's ASQ will eventually be unattainable. Likewise, if the Roseburg SYU chooses instead to focus their regeneration harvest in stands in the 40-70 year age group above 625 acres, the ASQ will

eventually be unattainable. In order to ensure that this last scenario does not occur, the SFO needs to coordinate their Decision Documentation and implemented actions off of the Deadman's Folley EA along with actions in the LITA authorized from other analyses across the entire Roseburg SYU. As shown in Tables 2 and 3, the Roseburg SYU will be overharvesting their 40-70 age group with regeneration by 1,132 acres according to the RMP models. AFRC is concerned the Roseburg BLM District has not chosen to focus regeneration treatment in the 2,394 acres over 80 years old as the models direct. AFRC also believes that regenerating the oldest stands first makes the most logical sense silviculturally by allowing younger stands to be thinned and then regenerated. Older stands are more likely in a state where regeneration will most greatly benefit the stand.

*Please identify how this project conforms with the greater strategy of following the modeled outputs to sustainably acquire the Annual and Decadal ASQ.*

### **Purpose and Need**

The FONSI references EA pages 5-6 and 27-28 in its discussion of issues related to sustained yield management. The EA states on page 5, "Deferring harvest now would forgo the opportunity to contribute timber volume toward meeting the 32 million board feet (mmbf) declared ASQ (NCO ROD/RMP, p. 6) for the Roseburg sustained-yield unit in accordance with sustained yield timber management as directed by the NCO ROD/RMP (pp. 5-6, 59)." The BLM states that each individual timber sale and project are integral to the District meeting its Annual ASQ and Decadal ASQ. AFRC agrees with this concept and believes that analyzing in conformance with the models, which created those ASQ numbers, on a per project basis is necessary. If the projects are integral to meet ASQ, and ASQ was determined based on the models from the RMP EIS, then the projects should be compliant with the models to meet the ASQ.

The FONSI identifies "issues" that were analyzed in the EA. One of these issues is identified as: "Timber volume contributed to sustained yield management and to Roseburg District ASQ and adjustment of age class distribution." We assume the BLM is considering any timber harvest off of lands designated as HLB to be "contributing to ASQ." However, there is a distinct difference between managing timber sustainably and simply contributing to the ASQ. While aimlessly harvesting timber off of lands designated as HLB would "contribute ASQ volume", it would not necessarily do so in a sustainable manner. The ASQ that you are "contributing to" was calculated based on the above vegetation models. Therefore, in our opinion, the BLM should have described in the EA and FONSI that the stands selected for regeneration were selected because the vegetation models compel the BLM to do so. Instead, the FONSI references language on page 5 of the EA that states that "these stands have reached a condition that makes them suitable for regeneration timber harvest." AFRC appreciates the RMP Direction of "Manage forest stands to achieve continual timber production that can be sustained through a balance of growth and harvest" was included in the Purpose and Need for the Project. As described above, AFRC does not believe the realization of sustainable management has been employed in this project. We understand many of the units have a salvage component to them which may be an appropriate reason to treat more

acres through regeneration than modeled in the RMP EIS. Under these unforeseen situations, corrective action is extremely important.

## **Alternative 2 – Proposed Action**

### **Timber Management**

Approximately half of the FOI stands are identified as being at 55% or greater relative density. This indicates intense stand competition is occurring. Doug-fir stands reach the point where diameter growth begins to decline, and suppression mortality increases when the relative density is over 55. Concurrently, all stands except FOI stands 32249, 31268, and 32324 have a canopy cover of greater than or equal to 70%. This indicates treatment is needed in these stands.

AFRC would like to know what the desired BA retention for this project is or what will drive differences in BA silviculturally to be left, i.e. what type of an end result is the SFO trying to achieve. In addition, the EA describes two types of retention; aggregate/aggregated groups and dispersed/individual trees. If dispersed retention is defined as individual trees, then why is there an acreage associated with it (<0.25 acres). Please also be strategic when identifying locations for individual trees or groups for retention. Ground based equipment can more efficiently weave through retention trees whereas yarding corridors may be more limiting based on OSHA standards and general logging feasibility.

***Please clarify if dispersed retention is individual trees or small aggregated groups.***

***Please include “consideration of logging feasibility” and “consideration of operational safety” for location for retention trees in the list of candidate area.***

### **Riparian Reserve Thinning**

AFRC appreciates the inclusion of Riparian thinning in this project. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that the RMP mandates should be considered. RR stands that are <10 acres can have group selection openings at most 2.5 acres in size.

***Why does the BLM limit group selection openings to 0.25 acres in this case?***

### **Snag Creation**

Please include on page 15 of the EA under snag creation that snags are only required to be created “in stands with less than 26 snags per acre > 10” DBH and less than 8 snags per acre > 20” DBH on average across the harvest unit.” (NCO ROD/RMP, pg. 61). Also, please include operationally damaged trees in the count of snags on the landscape because they will be recruited as snags moving forward. In addition, snag creation (retention trees) should be concentrated “in areas of the stan where the BLM does not presently anticipate skidding or yarding will occur within 20 years.” (NCO ROD/RMP, pg. 61).

## Road Management

AFRC did not identify in the analysis how many and which roads will allow wet season haul.

*Please identify through a table or spatially on a map which roads will allow wet season haul.*

## Northern Spotted Owl (NSO)

AFRC would like to remind the SFO that management direction and land use allocations in the 2016 ROD/RMP are intended to constitute the BLM 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, 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.

AFRC appreciates the inclusion of the adaptive management strategy within this EA and thinks continuing to include it in future EA's is essential in maintaining transparency. Table 2-3 which describes the adaptive management strategy is inconsistent with the strategy laid out for the Third Rock EA. Under Occupied, Home Range Not Habitat-Limited, NRF and Dispersal-Only the mean habitat value of 1,810 acres was used instead of 1,158 acres as stated in other places of the adaptive management strategy and in the Third Rock EA.

*Please explain the inconsistency of 1,158 acres or 1,810 acres of NRF as the mean habitat value (40% of home range).*

AFRC expects to see that as Decision documents are released from this Project moving forward, clear and concise tiering to the BO from the US Fish and Wildlife Service will accompany any decision to defer or thin a unit according to the adaptive management strategy. This tiering should include language from the US Fish and Wildlife Service that indicates regeneration will result in Incidental Take.

## Project Design Feature

The timber products provided by the BLM are crucial to the health of our membership. 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. These benefits 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.

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 the 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 EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the 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 Medford BLM market area with a variety of skills and equipment. Developing an EA 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. To address this issue, we would like to see flexibility in the EA and 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.

The newest operating system is tethered 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. Please do not write yourself out of using this innovative technology. **We recommend phrasing the language in your ensuing NEPA document to focus on desired end results for soil conditions rather than prescribing the type of equipment necessary to meet those conditions.**

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.

As stated above, flexible and condition based PDFs allow for better and more opportunities for the land to get treated in a timely fashion. Project design features should be specific to the project and align with the RMP. If the PDF is outlined in the RMP it does not need to be rewritten in the project document. By including a date, the operator has no opportunity to work when the weather is nice, but it is outside of the timing restrictions. Because shutdowns 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. Below are concerns and suggestions AFRC has that would align the PDFs with industry's needs and implementation concerns.

***Please make sure PDFs are not reiterations of the RMP Standards and Guidelines. However, AFRC does appreciate the identification of source/citation related to each PDF. Knowing which come directly from the ID Team allows for the public to identify***

***Please delete operating date restrictions, when the objective of the PDF is condition based.***

***Please make condition based limits and rational available to the public.***

***Please make sure similar PDFs are consistent.***

## **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 defensible NEPA document.

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](mailto:aastor@amforest.org).

Sincerely,

Amanda Astor  
Southwestern Oregon Field Forester  
American Forest Resource Council

