



June 25, 2019

Karen Schank, Field Manager  
Bureau of Land Management  
Northwest Oregon District, Tillamook Field Office  
4610 Third Street  
Tillamook, OR 97141

**In Reply To:** North Yamhill EA

Dear Ms. Schank:

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 Tillamook Field Office (TFO), 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.

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.**

In our scoping comments for the North Yamhill project, we highlighted these points and referenced the sustained-yield tables 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	
<b>Total Mod Intensity</b>		<b>11,122</b>	<b>6,308</b>

We appreciate the attention that the TFO gave to these comments as reflected in the North Yamhill EA. The discussion provided on page 44-47 indicates that the TFO has an understanding and appreciation of the importance of the vegetation models as they apply to the Salem SYU ASQ. This discussion also lays out a plan for management in the TFO that mirrors the outputs of the models. Thank you for addressing this component of the 2016 RMPs and providing a recognition of its importance to achieving a management paradigm in the HLB that will manage forest stands to achieve continual timber production that can be sustained through a balance of growth and harvest.

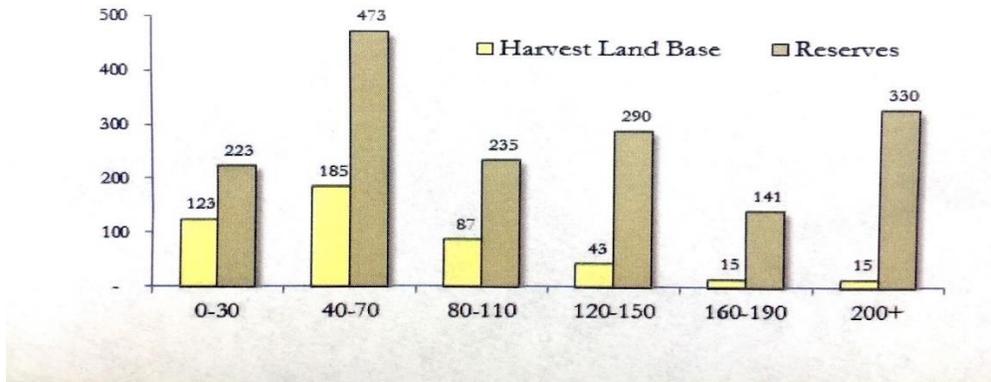
The appropriate management of every acre of land designated as HLB under the 2016 RMPs is critical to AFRC's membership. This is a reality created in part by the disproportionate designation of land allocations in this RMP. 80% of the O&C Lands were allocated as "reserves" where sustained-yield timber management is prohibited. This leaves only 20% from which AFRC's membership can depend upon a sustainable supply of timber products. This disparity underscores the BLM's responsibility to make every effort to treat that 20% as it is intended. The HLB deferrals proposed under Sub-Alternative 2A, which amount to 628 acres, are absurd in the context of the **1,840,858 acres** already placed in reserve allocations. These numbers should also be a decision-making factor when considering the reforestation proposal for unit 28E-1. The small amount of HLB available for timber production should be producing timber that is demanded by the purchasers in western Oregon. Reestablishment of oak species on this land base will not fulfill this demand and should not be implemented. Alternative 4 provides a reforestation plan that is consistent with the local industry's needs and should be selected. Please consider these numbers when making an implementation decision on this project.

AFRC would like to remind the Tillamook 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 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 North Yamhill EA. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or [ageissler@amforest.org](mailto:ageissler@amforest.org).

Sincerely,

Andy Geissler  
Federal Timber Program Director  
American Forest Resource Council