



June 7, 2019

Rebecca Brooke  
Bureau of Land Management  
Upper Willamette Field Office  
3106 Pierce Parkway, Suite E  
Springfield, OR 97477-7910

**In Reply To:** Shotcash EA

Dear Ms. Brooke:

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 Upper Willamette 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.

In our scoping comments submitted for this project we outlined our interpretation of how the Eugene SYUs ASQ of 53 MMBF was calculated through vegetation modeling during development of the 2016 RMPs so that the RMPs would comply with the O&C Act's mandate of sustained-yield timber management. We outlined that we believe that the BLM must implement treatments that comply with those vegetation models in order to manage sustainably. A management approach that discards the models used to calculate the 53 MMBF number would ultimately result in the attainment of this 53 MMBF number extremely unlikely. This is not the first project on the Upper Willamette field office that we have outlined this interpretation. The BLM has addressed this request of ours in past EAs but seems to have elected not to for the Shotcash EA. Regardless, we maintain our position on the role of the vegetation models used to calculate the ASQs for each SYU covered by the 2016 RMPs and believe that the BLM must conduct management treatments on the HLB in accordance with those models.

The Shotcash EA describes the purpose of the project, and the included management actions on lands designated as HLB, as to “contribute to the declared ASQ of the Eugene SYU.” **We urge the BLM to distinguish between “contributing 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.

Below is a table compiled from BLM source databases used in the modeling for the Proposed Resource Management Plan (PRMP), which is copied below. The ASQ that the Upper Willamette Field Office references numerous times in the Shotcash EA was not pulled out of thin air—instead, it was *calculated* based on a cycle of regeneration harvest and commercial thinning of forest stands of specific ages. If the BLM does not adhere to these calculations, then the calculated ASQ is meaningless and unattainable. Furthermore, the ASQ for the Eugene Sustained Yield Unit (SYU) is only **sustainable** if these models are followed as closely as possible.

## Eugene SYU

HMP Desc	Age Grp 2013	GIS_Acres	First Decade	First Decade
			Regen	Thinning
Mod Intensity	1) 0-30	14,827		
	2) 40-70	33,900	5,197	2,998
	3) 80-110	6,840	4,208	
	4) 120-150	67	44	
	5) 160-190	3	2	
	6) 200+	9	9	
<b>Total Mod Intensity</b>		<b>55,647</b>	<b>9,460</b>	<b>2,998</b>

Both alternative 2 and 3 propose treatments that are consistent with these models. We appreciate the Field Office only analyzing thinning treatments in stands in the 40-70 year age class.

In our scoping comments, we urged the BLM to consider commercial thinning treatments in riparian reserves, and to develop an alternative that considers it. We believed, based on our field visits, that density management in the outer zones of the reserves would be consistent with RMP direction. In Appendix A, the BLM justifies their dismissal of this proposal because it does not meet the purpose and need. AFRC believes this is a flawed justification for riparian reserve management deferral. Essentially, it appears that the BLM designed their purpose and need to create a justification for riparian reserve management deferral. This approach seems backwards to us. We feel that the appropriate approach would be to assess the needs of those stands in the riparian reserve and to include a project objective geared toward addressing those needs.

Furthermore, the BLM writes in Appendix A that “the commenter did not explain for what reason they were suggesting the alternative.” We assume that the “commenter” referenced here is AFRC. What we wrote in our scoping comments is italicized below:

*AFRC urges the BLM to consider proactive management in riparian reserves. Typically, the overstocked and uniform stand characteristics that exist in the uplands also exist in the riparian areas. It has been well documented that thinning in riparian areas accelerates the stand’s trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of small diameter suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the BLM to focus their riparian reserve treatments on a variety of native habitats. 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.*

*Ultimately, we would like the BLM to broaden their Riparian Reserve treatment areas to achieve multiple objectives in the future. Most of the land adjacent to and over intermittent streams in the project area resembles a dense and uniform stand of primarily Douglas-fir. Implementation of no cut buffers on certain streams will inhibit the achievement of important in stream components such as large wood. One of the main benefits of thinning at this stage of seral development is the accelerated attainment of large trees to provide large in stream wood. It has been documented by many that most of the wood that naturally recruits to streams comes from within the first 65 feet of the stream channel (Murphy and Koski, 1989; McDade et al. 1990. Johnson et al. 2011). So if this is where the LWD is coming from then thinning in this region would likely accelerate its creation. We encourage the BLM to design riparian thinning treatments on this project in ways that foster positive changes to large wood supplies that would result in measurable changes. One way to accomplish this is to reduce the no-cut buffers. It has also been documented that vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment (Rashin et al. 2006). Partial cutting down to one or two conifers from intermittent and perennial stream channels would accelerate the recruitment of LWD with minimal impacts to sedimentation and stream temperature. We would like the BLM to consider these trade-offs closely in the planning for this project to improve riparian conditions on the maximum amount of these reserves.*

**Please help us understand how the paragraphs above fails to “explain for what reason” we were suggesting riparian reserve treatment?** We want to make sure that our requests are clear and justified on future projects and we’re uncertain as to how we can make our requests for active management in riparian reserves much clearer than how we did on the Shotcash scoping comments above. Furthermore, regarding the development of alternative 4, we noticed on page 16 of the EA the BLM writes that “the BLM developed this alternative in response to public scoping comments requesting no new roads. The BLM interpreted the comment to mean that the BLM should analyze a harvest alternative that would not create new ground disturbance in order to access the harvest units.” It seems that here the BLM exercised some interpretation of a public scoping comment that did not clearly and fully describe the commenters intent. Why could the BLM not exercise the same level of interpretation on AFRC’s request to actively manage in riparian reserves?

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. We would like to applaud the Upper Willamette Field office for continuing to be leader in developing NEPA documents that provide flexibility to the diverse logging infrastructure operating in Oregon. The inclusion of the provision for winter logging in the Purpose & Need is also commendable. The language on page 7 of the EA clearly shows that the Upper Willamette field office understands the complexities surrounding the forest sector's need for year-round work. We believe this flexibility will ultimately result in more active bidders on the subsequent timber sales, higher bid premiums, and a more favorable work environment for forest contractors. Thank you.

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. We urge the Field Office to not incorporate any elements from Alternative 4, which seems to have been developed due to a public commenter that prefers the BLM not construct new roads. In fact, we cannot determine which aspect of the Purpose and Need of the project that alternative 4 addresses. **Can you please clarify how analyzing an alternative that arbitrarily defers any and all road construction addresses any of the three identified Purposes on pages 4-7?**

AFRC is happy to be involved in the planning and decision-making process for the Shotcash 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  
Western Oregon Field Forester

American Forest Resource Council