



June 29, 2011

Cathy Hoffine  
Myrtlewood Field Manager  
Coos Bay District  
Bureau of Land Management  
1300 Airport Lane  
North Bend, Oregon 97459

**In Reply To:** Wagon Road Pilot Scoping Comments

Dear Mrs. Hoffine:

The American Forest Resource Council (AFRC) is pleased to provide this information to be included in your planning of the proposed Wagon Road Pilot. AFRC represents 80 forest product businesses and forest landowners in the west. Our mission is to create a favorable operating environment for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving federal laws, regulations, policies and decisions that determine or influence the management of all lands. Many of our members have their operations in communities adjacent to the Coos Bay Bureau of Land Management, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities.

The May 18, 2011 Scoping Notice for the Wagon Road Pilot invites comments on any issues or concerns regarding the proposal. We would like to make comments on the demonstration of Franklin and Johnsons principals on these Coos Bay Wagon Roads (CBWR).

AFRC is very concerned about this project for a number of reasons. Our primary concern is that the management principles being promoted by Drs. Franklin and Johnson are not consistent with the mandates of the O&C Act. The O & C Act imposes several mandatory duties on the BLM which include:

1. "All of the O & C lands classified as timberlands "shall be managed for permanent forest production."
2. The timber on those lands "shall be sold, cut, and removed in conformity with the principals of sustained yield ...."
3. "The annual productive capacity for such lands shall be determined and declared."

The principles of sustained yield dictated by the O&C Act are biologically based and include all lands classified as “timberlands.” Most of the “Goals of the Cooperative Management Area” listed in Appendix 5 of the *Coos Bay Wagon Road Forest Management Pilot* paper are inconsistent with these principles of the sustained yield of timber mandated by the O&C Act including the incorporation of Drs. Franklin and Johnsons recommendations for moist site regeneration.

Before the BLM decides what is to be done on the CBWR lands they must first identify the lands that are suitable for timber production (timberlands) and calculate what the annual productive capacity is (sustained yield). Any proposed projects on these lands must then be assessed as to whether they would contribute or hinder District’s ability to sell of the calculated annual sustained yield.

This same paper lists the goals of the Coos Bay Wagon Road Pilot (CBWRP). The third goal is to test new riparian management approaches that demonstrate management aimed at sustaining the long-term productivity of dynamic aquatic ecosystems. When reading through the scoping document we don’t see this as being one of the project objectives. We ask that this be addressed in the EA. There is plenty of research that shows that thinning inside the riparian areas has long term benefits.

AFRC would like to see an alternative that maximizes the number of acres treated, uses the most economical harvest systems, maximizes the volume per acre removed within the limitations of Drs. Johnson and Franklin principles, has the minimum number of operating restrictions, and does not exclude the removal of large trees or the construction of new roads which are needed to meet the restoration objectives of Drs. Johnson and Franklin’s.

AFRC would like to see the following issues and concerns addressed in the EA.

- What are the current land allocations in the project area? What are their stated intentions for management and how does this project meet these?
- We would like to see an alternative that uses the Western Oregon Plan Revision (WOPR) as the land use plan.
- The EA should include a detailed economic analysis, displaying the difference in alternatives.
- What are the potential negative effects of not treating the remainder of the land within the analysis area?
- What decision making process occurred that reduced the size of the project from 640 acres to 200 acres? We would like to see what the criteria is for determining what stands need treatment.
- When designing these timber sales the BLM needs to pay careful attention to the economic analysis. There needs to be some room for changes in log prices. By the time the BLM puts the project up for sale the log prices could decrease. If this project does not pencil out to be a profitable project, it will not sell. As a result, the land will not get treated and lots of time and money will be wasted.

- Appropriate and locally available harvesting systems should be used when designing the timber sale.

AFRC also supports the needed road construction, reconstruction, and maintenance that will help the Coos Bay BLM offer economically viable timber sales, give them greater access to the area for future fuel reduction treatments, and improve the agency's ability to respond to wildfires. Temporary roads can always be removed, or made inaccessible to vehicles after logging operations are completed. We have visited the proposed area and heard that the neighboring landowner will be reconstructing the road that traverses through the planning area. However we believe there is a need to construct some additional temporary spur roads to access some areas.

Seasonal, recreational, and wildlife restrictions often make timber sales extremely difficult to complete within the contract timelines. Fire season restrictions on top of seasonal and wildlife restrictions can often limit workdays to 4-5 hours. All these restrictions have a cost to the purchaser and results in a lower bid for the stumpage. AFRC would like to encourage the Coos Bay BLM to offer sales that will allow winter harvesting on improved roads or allow for roads and spurs to be improved so wet season harvesting can be accomplished. The loggers need winter work and the mills generally need winter wood, this is a big bidding issue for a purchaser.

For fuel treatments, AFRC would like to see the BLM have some flexibility. Rather than specifying a specific method of accomplishing your resource objectives, you should instead identify the objectives you are trying to accomplish and any limitations to resource disturbance you require. The purchaser could then identify the method they would like to implement to meet the resource objectives given their particular employee/equipment mix. By doing this, the purchasers' can maximize their efficiencies' which will translate into higher bid rates and higher returns to the government. In the case of hand piling, the resource objective might be to reduce the amount of 1-20 hour fuels to XX tons per acre while not increasing soil compaction on more than XX percent of the unit by more than XX and not damaging more than XX% of the leave trees. The purchaser could then determine the most cost effective method to accomplish the resource objectives thereby maximizing the retained receipts that could be used for other restoration activities.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision making process for the Wagon Road Pilot. Should you have any questions regarding the above comments, or get an appeal on this project, please contact me at 541-342-1892 or [btenbusch@amforest.org](mailto:btenbusch@amforest.org).

Sincerely,

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American Forest Resource Council  
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