



December 9, 2011

Kathy Hoffine
Myrtlewood Field Manager
Coos Bay BLM
1300 Airport Lane
North Bend, OR 97459

In Reply To: Wagon Road Pilot EA

Dear Ms. 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 Project. AFRC represents over 90 forest product businesses and forest landowners in twelve western states. 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 BLM, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC would like the BLM to address why thinning treatments are not being executed in all of the Riparian Reserves. BLM stated as a response in the "Issues Considered" portion of this EA that "there are 75 acres of overstocked Riparian Reserve stands not treated in this proposal." The Purpose and Need for the Wagon Road Project in the EA describes portions of the riparian reserve as "an overstocked condition which has uniform structure and low stand vigor." The BLM is justifying thinning the RMZ for beargrass enhancement as it meets the Purpose and Need for collaboration with the CIT. The Purpose and Need also describes "silvicultural activities within suitable forest lands" and "timber sale volume as required by the O&C Act." It is obvious from the above description of the riparian reserve made by the ID team that these areas are "suitable for silvicultural activities." The O&C Act mandates that timber shall be cut to protect watersheds and regulate stream flow. It has generally been well documented that thinning from below in riparian areas has positive long-term effects on riparian habitat and overall watershed health. AFRC feels that the Purpose and Need easily justifies thinning across all of the overstocked riparian reserves just as much as it justifies

collaborative efforts with the CIT; yet thinning in the riparian reserve to promote beargrass was implemented and thinning in the riparian reserve to promote stand vigor and riparian and watershed health was not.

Furthermore, the EA states on page 27 under the No Action Alternative that “Within the Riparian Reserves, retaining the current stocking levels would retard attainment of three functions that are contingent on the presence of large diameter trees: large wood delivery to streams, large wood delivered to riparian areas, and wildlife habitats.” These comments appear to use the attainment of late seral forest structure to justify Riparian Reserve treatments. However, the justification of the actual Riparian Reserve thinning being executed is for beargrass promotion. It appears that the BLM recognizes the possible negative effects of not entering the Riparian Reserves. Had these acres not been excluded, these effects could have been used to further promote the Action Alternative over the No Action Alternative.

AFRC recognizes the value of using experimental prescriptions, such as those outlined by Drs. Franklin and Johnson, to achieve the goals laid out in the O&C Act, the NWFP, and the Coos Bay RMP. However, we feel that several portions of this particular plan do not coincide with the objectives of the Matrix land allocation and would be better suited on Adaptive Management Areas (Despite the fact that the Coos Bay District does not have any Adaptive Management Areas). For example, Drs. Franklin and Johnson’s recommendations for moist site regeneration and their vision of “quality early-successional habitat” include prescriptions that are in conflict with several specific matrix land objectives. The Matrix land allocation has a timber resource objective of promoting tree survival and growth, and to achieve a balance between wood volume production, quality of wood, and timber value at harvest. Planting 200 trees per acre at non-uniform spacing to be maintained for 20-30 years does not achieve this objective. This prescription was written as a proposal. This proposal however has not been tried or proven on the ground, and should therefore be viewed as experimental. The matrix land allocation has no objective for silvicultural experimentation; rather it states that “treatments would be designed to prevent the development of undesirable stand characteristics.” This prescription belongs on Adaptive Management Areas, not Matrix.

AFRC appreciates the BLM’s efforts to make provisions that enable all season harvest and haul operations. 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. It appears that this will be permissible with the road renovation work and rocked new construction roads in the plan. Some seasonal restrictions on ground based equipment are also mentioned in the EA. AFRC would like to encourage the BLM to allow for exceptions to this provision so that ground operations, where feasible, be permitted to coincide with the all-season specs of the roads described above.

AFRC also appreciates that there appears to be flexibility in the requirements for rehab, equipment use, and fuels treatments. Skid trail rehabilitation and slash disposal can be accomplished in a multitude of ways depending on the operator and the equipment they

have available. Allowing for this flexibility can reduce risk for a potential bidder and significantly increase the bid price. In regards to the fuels treatments, we feel that there are still opportunities to move toward more of an objective based approach when writing prescriptions. We urge the BLM to continue to provide these opportunities, and to look for new ways that permit our members to operate within the scope of the EA, while also being able to take advantage of their own strengths in order to maximize their efficiencies.

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, please contact me at 541-525-6113 or at ageissler@amforest.org

Sincerely,

Andy Geissler
Western Oregon Field Forester
American Forest Resource Council