Cascadia Wildlands
we like it wild.

June 30, 2011

Coos Bay District BLM
Aimee Hoefs
1300 Airport Lane, North Bend, OR 97459-2000
Emailed to OR_CoosBay_Mail@blm.gov

Aimee,

Please consider these comments from Cascadia Wildlands and Klamath Siskiyou Wildlands Center when developing alternatives for the Wagon Road Pilot Project Environmental Assessment.

In summary: The Purpose and Need for this project needs to be better defined. The EA should include a no-action alternative that continues, for another 20 years, the current BLM direction of successfully meeting timber-target goals. Action alternatives for providing early-seral structure should include creating gaps by killing small groups of trees with fire. Natural regeneration should be used instead of artificial reforestation. Monitoring should be fully described in the EA. The Coquille Tribe's proposal to gain management over an additional 58,000 acres of BLM lands should be eliminated as a component of this project.

Table of Contents:

1. Purpose and Need 2
2. Alternatives 4
2. Reforestation 6
4. Monitoring 9
5. Marbled Murrelet Occupied habitat 9
6. Port Orford Cedar 10
7. Forest Carbon-Global Warming 11
8. Herbicides and Mountain Beavers 13
9. Retention area, old growth trees, and maps 13
10. Tailhold and Guyline Trees 14
11. Roads 15
12. Survey and Manage 15
13. Cumulative Impacts 15
14. Jobs 16
15. Tribal Agreements with the BLM 17
16. Pilot Project for Tribal Management of 59,000 acres 18
Conclusion and contact information 21

POB 10455 Eugene OR 97440 - ph 541.434.1463 - f 541.434.6494 - info@cascwild.org
www.CascWild.org

1. Purpose and Need

The Coos Bay BLM scoping notice tells us this pilot project is needed to:

> "…demonstrate the principles of ecosystem restoration developed by Drs. Jerry F. Franklin and K. Norman Johnson (*Applying Restoration Principles on the O&C Forests in Southwest Oregon, 2010)*."

The "restoration" to be accomplished by this project is defined as:

> "…activities that are designed to restore forests and landscapes to conditions that provide the diversity *needed* to restore and sustain native biodiversity and essential ecosystem functions."

This has been interpreted to include a need to "restore" early-seral forests through regeneration harvest, apparently because it is not provided for on the industrial-style clearcuts surrounding the project area. The scoping notice states:

> "There is a lack of diversity concerning early-successional stages in Moist Forest ecosystems which can be provided through regeneration harvest and modified site preparation and planting. The structure and composition of early successional stages are important to perpetuating species populations at the local scale, thereby enabling reestablishment of species into the regenerated forest and promoting the sustainability of current ecosystem dynamics while providing timber harvest opportunities."[1]

The EA should clearly identify what "structure and composition" is needed and what specific wildlife species is "important to perpetuate", that is not sustained on the adjoining industrial clearcuts. The Scoping Notice "need" must match the restoration definition of Franklin and Johnson, which requires restoration to be "needed to restore and sustain native biodiversity". The Purpose and Need statement in the EA must be very clear on what native wildlife needs this restoration. Monitoring must also be clearly focused on how the early-seral wildlife species being provided for responds to this project.

Large decayed trees and snags provides for songbirds and cavity nesting species. But what else, other than species that use snags, is needed, that the pilot project would provide for? The EA should detail which species will benefit from the brush habitat that is being produced, if those species are rare or declining, and for how long this project will provide the brush they need. The EA should describe which specific brush species is necessary to provide for the wildlife in need.

If the BLM determines that early-seral species need more large snags and down wood, the EA should clearly document how many song birds and cavity nesters are being provided for with snags, and how different this is from other BLM alternatives, such as thinning projects with gaps, or in unsalvaged post-fire events.

The legacy component of large, soft pieces of down wood, left over from the first logging is also protected in the usual BLM thinning projects, so that component should not be

[1] Wagon Road Pilot scoping notice. Coos Bay BLM. 5-18-11

considered a benefit over other alternatives included in the EA. The EA should enumerate what legacy components are needed, as well as the wildlife species that needs them, that is not currently being provided for in either a no-action alternative, in a thinning alternative, or on adjoining industrial clearcuts, and why these components are important to develop now in section 17.

Because this is a "restoration" project of early-seral habitat, the BLM should provide for 100% of the woodpecker and cavity nesting population, not just 40%.

Snags is the component most missing from the landscape (industrial clearcuts provide for plenty of brush after herbicides wear off). Therefore, the pilot project EA must fully describe how the snag component will be restored (or retained), and in what quantity, *compared to a natural event.* In other words, the EA should disclose what is the natural dead wood component in the coast range after a natural stand-replacing event, including how many snags per acre. The BLM should compare this natural event with what will be left in this project, so we at least know how close we are coming to providing the missing early-seral habitat. The EA should describe how many existing snags will be protected, how many will be created intentionally, estimate unintentional snag creation, and how many snags will result in the future from the retained green trees, and how far in the future. It seems that if the BLM is going to restore this early-seral component, the biggest trees that would otherwise be cut and put on a log truck, should be retained instead to create snag habitat.

Other "restoration" factors the EA should consider: The "restoration" need for this project is defined as "…activities that are designed to restore forests and landscapes to conditions that provide the diversity *needed* to restore and sustain native biodiversity and essential ecosystem functions."

When meeting this need, the EA should consider whether these 200 acres in section 17 are our next-best old growth needed to sustain healthy populations of late-seral species, especially now that barred owl is competing for space with the spotted owl.

The stand that was chosen for this project contains some significant old growth trees and trees older than 150 years old, scattered throughout the unit. Trees over 4' DBH are within the stands labeled as 70 years old, making some areas appear to be older. There is a lot of western Hemlock in the stands (much more than a plantation), some of which appear older than 70 years old. The EA should confirm that they are as young as originally thought.

There are thousands of acres of plantations in the adjoining Late Successional Reserve that are younger than this stand, and will not reach NSO nesting habitat as quickly as this stand will if it is left. Therefore, the EA should consider if these matrix stands are also important to the recovery of the spotted owl. Section 17 is close to (or is) providing a large block of the best owl habitat on the landscape, closer than young stands in the LSR. The EA must consider this important contribution to spotted owl and murrelet habitat in the no-action alternative.

2. Alternatives

The No-Action alternative should consider what would happen if no commercial logging occurred in this stand. This is a 70-year old forest that was not commercially replanted, and thus has more species and spacing diversity than a younger plantation. It contains scattered old growth trees and currently provides some nesting, roosting, and foraging habitat for the Northern Spotted Owl. It is only about 40 years away from providing high-quality spotted owl habitat. Considering the NSO is in deep trouble now, the no-action alternative should consider the benefits to the owl from doing nothing.

A no-action alternative would still meet the "need" for restoration, because the definition of restoration the BLM is using fits with spotted owl needs: "…activities that are designed to restore forests and landscapes to conditions that provide the diversity *needed* to restore and sustain native biodiversity and essential ecosystem functions."[2] The "economic and social" purposes can still be met by BLM continuing to exceed your timber targets through thinning, for the 20 years of needed thinning remaining.

The no-action alternative should include how much spotted owl (or late-seral) habitat exists within the watershed, not just on BLM land, but the complete watershed. The BLM has stated they will take a watershed-landscape view of this pilot project, and one of those views should be the amount of old growth forests remaining.

The East Fork Coquille Watershed Analysis says that 70% of the watershed is currently in plantations under 60 years old.[3] Historically, 61% of all Coast Range coniferous forests were in old growth condition (over 200 years).[4] Only 12% of the East Fork Coquille watershed is now in forests over 160 years old.[5] Since the watershed is already below historical acres of mature forests, the no-action alternative must consider the impacts to wildlife if this stand were not harvested and allowed to grow quickly into higher quality late-seral habitat.

When determining which is needed more in the watershed, early seral or late seral habitat, the EA should consider the East Fork Coquille Watershed analysis. It states:

> "Species requiring old-growth forest habitats, or key habitat components (snags, complex tree canopies, down logs, etc.) have been most affected. Populations of these plant and animal species have declined dramatically, and many are restricted to small isolated habitat islands. The small size and isolation of these populations put these species and ecological communities at risk (Noss and Cooperrider 1994)."[6]

The no-action alternative must include the importance of forest connectivity between the 160 year old forests and marbled murrelet occupied sites in the southern and north west part of section 17 and with the old growth in the eastern part of section 17 and the BLM

---

[2] Coos Bay BLM Wagon Road Pilot Project scoping notice.
[3] East Fork Coquille Watershed Analysis. Coos Bay BLM. May 2000. page ES IV.
[4] East Fork Coquille Watershed Analysis. page V-5.
[5] East Fork Coquille Watershed Analysis. page V-7.
[6] EFC Watershed Analysis, page V-37.

ownership in section 16, and with the older forests in section 18 and 21. **Doing a regeneration harvest of 200 acres of mature forests in the middle of section 17 appears to severely fragment these older forests.** The no-action alternative must consider the health of the forests if this fragmentation were to not occur, and the impacts of edge-effects if fragmentation were to occur.

The no-action alternative should consider deferring the regeneration harvests until sufficient spotted owl habitat has been restored in the LSR.

The no-action alternative should also consider the impacts of the Western Oregon Plan Revisions (WOPR) on the old growth or LSR in the watershed. That plan, which the Coos Bay BLM hopes to operate under this year, could log even more spotted owl habitat in the watershed. It could even turn reserves, such as riparian reserves and late successional reserves, into timber management areas. The no-action alternative must consider this reasonable foreseeable action when evaluating if there will be enough older forests in the area for endangered species.

The no-action alternative should also consider what projects the BLM will not do, because they are busy doing this one. In the last 5 or 6 years, the Coos Bay BLM has been focusing on doing needed thinning in managed plantations, instead of regeneration harvests. There has been widespread consensus that this is the right path for the BLM – to get caught up on all the needed plantation thinning before more plantations are created.

The BLM should not take their eye off of that ball and stop or delay the pace of needed projects because there is pressure to regenerate bigger trees. The BLM has been able to provide 150% of their timber targets doing plantation thinning's. There is no additional obligation to get more timber to the mills.

At the public meeting, we were told that the reason for beginning regeneration harvests again is because the plantations that need to be thinned are running out. Are they? I thought there was 20 years left. **The no-action alternative should give some data on the claim plantations are "running out"**. That data should include reducing the Coos Bay BLM harvests back to 27 mmbf a year.

The EA's action alternatives should include various type of thinning treatments that the BLM has employed in the past to help restore diversity in younger forests. While this non-plantation, 70-year-old forest already shows the diversity needed for a late-seral forest, thinning could be employed to provide the early-seral habitat the BLM claims is needed. An alternative could propose heavy thinning and gaps, even gaps created with fire to help provide high-quality dead-tree habitat.

If the EA finds that snags is the most needed early-seral structure, an alternative could create gaps within the stand, concentrated around the largest trees that would not otherwise be retained. The large trees in the gaps center could then be killed with fire. The Forest Service employs this technique when restoring snag habitat. The BLM should also consider this as an action alternative if BLM finds early-seral structure is needed.

The EA should measure how different alternatives will best provide for specific wildlife species needing more habitat. If the BLM considers, for example, that more dead wood needs to be provided, the amount of dead wood left in the regeneration harvest should be compared with the amount of dead wood created in a BLM thinning project, not just the amount of dead wood left in an industrial clearcut. This will allow the BLM to evaluate how much additional early-seral habitat is being provided by regeneration vs. thinning young stands on BLM lands.

The current requirement for BLM regeneration in matrix is to retain up to 8 of the larger trees per acre, outside of Riparian Reserves. BLM often retained more than that. The EA should explain how many more retention trees would be left outside of Riparian Reserves. Since the current proposal is to plant 200 nursery stock trees per acre, the EA should be clear on if there is a significant difference between this regeneration harvest and a normal, NWFP regeneration harvest, especially different from a connectivity/ diversity regeneration harvest that can be provided for in the section just south of section 17. What is not immediately obvious, that the EA should explain, is what's the point of calling this a "Pilot Project" if there is little unique about the regeneration harvest alternative.

3. Reforestation

The EA should fully describe the reforestation plans for this project. While reforestation is not a usual component of timber sale EAs, it is an important issue within this pilot project because there appears to be a conflict in what was recommended in the pilot project proposals (natural regeneration), and what the BLM now wants to do (plant 200 trees per acre).

Reforestation issues should even be considered in alternatives, with one alternative planting 200 trees per acre, as suggested at the public meeting, and another alternative considering regeneration primarily by natural regeneration, as the wet-forest pilot project was originally designed.

Drs. Jerry Franklin and Norm Johnson are very clear that the wet-forest pilot project must use primarily natural regeneration. They say:

> "Elements of a silvicultural prescription for regeneration harvests in Moist Forests to provide diverse early successional habitat and regeneration of shade-intolerant tree species … Regeneration of trees will be primarily by natural regeneration."[7]

This is the original recommendation for the Wet Forest Pilot Project, as presented at our December meeting in Washington DC to Ken Salazar. It was the basis for the Secretary to approve the pilot projects. Natural regeneration is critical to the entire purpose of early-seral restoration. It should remain a part of this project, or at the least, as an

[7] Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon. Dr. Jerry Franklin and Dr. Norman Johnson. November 30, 2010. Page 8.

alternative considered in the EA. If not, the BLM must give a good reason for completely eliminating this important concept.

Artificially restocking the unit at 200 TPA (with mostly Douglas fir) will diminish the amount of time brush species dominate the unit. It is the brush species that Franklin and Johnson WANT to have on the landscape. They criticize the quality of early-seral habitat on private timberland because replanting eliminates native brush species quickly. In contrast, the pilot project's entire purpose is to retain this high-quality, early-seral wildlife habitat.

This pilot project is supposed to be different from industrial forest early-seral habitat. Planting 200 TPA instead of 400 TPA is not very different, especially since this project will leave scattered retention that will also contribute to reforestation. Planting 200 TPA, plus natural regeneration, will produce a dense tree plantation that will quickly shade out brush species and result in a project similar to traditional regeneration harvests, not different. Planting 200 TPAs is like a bait-and-switch trick. We were told we want brush for early-seral species, and then we are given just another fiber farm with artificial reforestation, using nursery stock seedlings.

The purpose of this project is:

> "Implementing regeneration harvests in Matrix forests using principles of ecological forestry to help provide a regular flow of structurally-complex, **early** successional habitat (as well as other **early** stages of forest development). These actions could help provide ecologically important habitats that have become increasingly rare…"[8]

Using scattered seed trees and natural regeneration is very rare now, but it is what we are supposed to be doing again. Planting 200 trees per acre turns that purpose around to one of a simple, business as usual, tree farm, bringing us down the familiar path of pre-commercial thinning, and then commercial thinning – all on a grid – just like our usual tree-farms. Instead, nuts and berries and butterflies and moths are what we are supposed to want, not a tree farm managed on a grid.

At the field trip it was suggested the stand in section 17 was aerial seeded, in response to complaints about the new reforestation strategy to plant 200 TPA. While that issue seems irrelevant to the conflict of artificial vs. natural regeneration, it is unlikely section 17 was aerial seeded. While aerial seeding was used 70 years ago, it was mostly used to reforest large burns with few green trees left. In contrast, Section 17 was an industrial clearcut, and no business person at that time would spend their profits on aerial seeding when leaving seed trees to do that job was the norm. The unit we saw was very diverse, including red cedar, Port Orford cedar, western hemlock, grand fir, Douglas fir, red alder, maple, and other hardwoods and brush species. Clearly this was not aerial seeded in Douglas fir. It has too many older western hemlocks for any Douglas fir reseeding.

If our goal is to restore an early-seral wildlife habitat with structure, the end product should be a similar mix of diverse species and diverse tree spacing.

---

[8] Restoration of Federal Forests in the Pacific Northwest: Strategies and Management Implications". Dr. K. Norman Johnson. Dr. Jerry Franklin. August 15, 2009. Page 6

Jerry Franklin and Norm Johnson recommended, "Regeneration of trees will be primarily by natural regeneration."[9], which means some limited replanting could occur. This should occur where specific species are under-represented on the landscape where they once were more abundant, such as Port Orford Cedar (POC). Disease resistant POC could be reintroduced by replanting.

Other than planting under-represented species, the EA should consider no artificial reforestation. For *early seral with structure* creation to be successful, there should be no opening so large that retained trees cannot reseed it. The early-seral habitat created should be retained on the landscape for as long as possible, not bypassed as quickly as possible with the use of re-planting.

"Ecological forestry encompasses forest practices (silvicultural activities) that are based on principles of natural stand development…"[10]. Johnson and Franklin state that where the objective is ecological forestry, such as this Coos Bay Pilot Project, reforestation by tree planting may be appropriate "to establish tree seed sources for specific species and locations but this should not be done using traditional approaches, which are designed to create uniformly stocked forest stands over large areas, even at low densities. Planting, if done, should create irregular patterns and variable densities to duplicate the spatial heterogeneity that is characteristic of natural regeneration."

"Regeneration would be considered in the context of the goal of nurturing the development of structurally-complex, early-successional communities. The need for artificial reforestation would be carefully evaluated. This evaluation would consider such issues as the availability of surviving seed trees…"[11]

"In designing regeneration harvest systems ecological forestry principles also call for recognizing and nurturing the diverse early successional communities that can develop following harvest and natural disturbances (Swanson, et al.submitted). This objective may result in different approaches to tree regeneration as well as the specifics of the retention harvest prescription, such as more reliance on natural regeneration and acceptance of competition from trees and shrubs."[12]

The EA must include at least one alternative that follows the recommendations of Franklin and Johnson for restoration of early-seral communities – natural regeneration.

4. Monitoring

Monitoring is a critical component of this project. If the BLM claims that specific early-seral wildlife species will be enhanced, monitoring must be in place to verify those

---

[9] Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon. Dr. Jerry Franklin and Dr. Norman Johnson. November 30, 2010. Page 8. Posted on the Coos Bay BLM Pilot Project web site.
[10] Restoration of Federal Forests in the Pacific Northwest: Strategies and Management Implications". Drs. Norman Johnson, Jerry Franklin. August 15, 2009. Page 71.
[11] Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon. Page 70.
[12] Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon. Page 23.

claims. Monitoring must consider the watershed landscape when measuring habitat for the target species, and if it is being provided for instead on industrial land clearcuts. Monitoring must tract species abundance within the project unit to see if the project is adequately providing habitat for the list of target species.

For a pilot project designed to be replicated over thousands of public land acres, on lands that are our next-best-old growth, monitoring is important to make sure the creation of early-seral habitat is doing what it is supposed to do. Desired outcomes need to be clearly defined, and a monitoring protocol described. It is also important to describe how monitoring will be funded and implemented over what period of time.

Monitoring should also track the impacts to wildlife that is dependent on mature forests, and how the habitat those species depend on could be degraded by this project. In addition to endangered species like the spotted owl and marbled murrelet, species like bats could be impacted because old growth forests provide higher quality roost sites than younger forests. A 70-year-old non-plantation, diverse forest provides higher quality roost sites than younger forests. Also consider White-footed voles, perhaps the rarest rodent in North America, which depends on mature alder habitat. Alder habitat is abundant in section 17.

5. Marbled murrelet occupied habitat.

In section 17, there is a narrow strip of Marbled Murrelet Occupied Habitat north of the main murrelet-occupied habitat area. Regeneration harvest should not occur anyplace near this occupied site. Murrelets are susceptible to nest predation when their occupied habitat is too close to forest edges. The regeneration harvest units should give this occupied habitat a wide buffer to protect this endangered species from edge impacts. At least one alternative in the EA should provide an adequate buffer for all occupied habitat areas. Edge effects can occur over 700' into the stand.

Road 28-10-17 goes right through this narrow strip of occupied murrelet habitat, and could fragment the much older forests that will not be logged. The EA should consider alternatives that do not fragment this habitat by widening the road.

> "Landscapes dominated by edge habitats favor generalist species at the expense of those dependent on interior habitat and microclimate. Some bird species may experience higher failure rates due to predation and nest parasitism when nesting on edges (see Noss and Cooperrider 1994 for a discussion). For now, protecting remaining refugia sites is critical to maintain populations of late-successional species, and facilitate re-colonization of recovering habitats. Based on the existing age class distribution, four decades of growth will be needed for late-seral stands to attain the vegetative and structural complexity of functional old-growth habitat…. emphasis should be to defer harvest as long as possible in stands that contribute most to connectivity. Priority for harvest deferral should be given to those stands which connect to adjacent subwatersheds or to larger more contiguous stands.[13]"

[13] EFC Watershed Analysis. Page V-25

These conditions exist in section 17, a contiguous stand of mature forests. This watershed analysis recommendation must be considered, at least in the no-action alternative.

How long has it been since the BLM has conducted marbled murrelet surveys in section 17, especially in the area proposed for regeneration harvest? It should be recent surveys. There are plenty of big trees with platforms scattered within what the BLM labels as 70-year-old forest that murrelets could be nesting in. Old surveys from years ago should not be used. Recent surveys are necessary.

6. Port Orford Cedar

There is a significant component of POC within this stand. In fact, there is a 3' DBH old POC very close to the 17.0 road, and it appears to be uninfected with root disease, Phytophthora lateralis. Much of the POC in section 17 could be disease resistant. The BLM must fully protect this disease-resistant POC across the unit. Use of the 17 road must not jeopardize the disease-free POC near that road, or any proposed new road.

Where POC currently exists in the stand, it should be retained to develop any naturally disease-resistant POC. POC should not be commercially sold in this pilot project so that regeneration of POC can be more successful. POC is allowed to be (and will be) exported from BLM land in raw log exports, thus selling POC does not provide any local mill jobs to the economy.

The EA should consider alternatives to any proposal for roadside sanitation – killing all Port Orford Cedar along roadsides. This is a useless and wasteful practice. According to the study by Goheen and Marshall[14], sanitizing does not work for many years after it is done. Disease in their study plots was not reduced for "four years after treatment."[15] They documented that "P. lateralis can survive in dead infected roots for up to seven years..."[16] Road sanitizing does not remove diseased roots and doesn't help when it is done just before, or during use of the road. To be effective, sanitizing would need to be done 4 to 7 years before use. If the BLM does not propose to do roadside sanitation 7 years before use, then alternatives must be considered.

Goheen and Marshell found that "use of roadside sanitation (at least in the case of treatments in already infested areas) should be done strategically. Sanitizing a road into a project area (in already infested stands) where activities are occurring at the same time or immediately after the sanitation treatment **are not likely to be valuable."**[17] Please follow this recommendation, or include an alternative that follows the Goheen and Marshell recommendations.

---

[14] "Monitoring effectiveness of roadside sanitation treatments to decrease likelihood of spread of Phytophthora lateralis in Southwest Oregon, USA." Donald J. Goheen and Katrina Marshall. USDA Forest Service, Southwest Oregon Forest Insect and Disease Service Center, Central Point, Oregon. USA. dgoheen@fs.fed.us Summarized on page 3&4-41 of the FSEIS.
[15] Goheen and Marshall. page 1.
[16] Goheen and Marshall. page 2.
[17] Management of POC in SW Oregon FEIS. 1/2004. page 3&4-41.

Goheen and Marshell also recommend that any "sanitation treatments need to be kept track of and repeated when new POC regeneration becomes established."[18] When the BLM makes a decision to do sanitation of POC, the BLM should make the decision for the follow-up treatment at the same time.

The POC management guidelines include "planting to increase the presence of POC"[19] The BLM must do this throughout the project area.

The BLM is co-managing this project with the Coquille Tribe. The Tribe has a different standard of protecting Port Orford Cedars than the BLM. Recently, the Tribe has written that:

> "It is true that the Tribe must follow the same standards and guides on adjacent federal forest lands; however the Tribe is not mandated to follow BLM policies, procedures, or instruction memorandum recommendations. The Tribe has complied with the NWP by developing a tribal management strategy for controlling the spread of POC Root Rot diseases."

The Tribal management strategy is apparently different than the strategy that the BLM developed in the Port Orford Cedar EIS. This Pilot Project must use the NEPA developed POC protection measures, not the tribal management strategy for controlling Phytophthora lateralis.

7. Forest Carbon and global warming.

The EA must consider the impacts on carbon from this project, including estimating the tons of carbon lost to the atmosphere through the loss of overstory trees, and including the fossil fuels used to harvest those trees and manage the plantation that results from that harvest.

The BLM has been considering carbon in timber sale EAs for the last 2 years, but the BLM has only done this in thinning projects. This will be the first regeneration harvest measured for carbon loss. In thinning units, the BLM has measured the loss of carbon through harvest, and the gain in carbon through increased tree growth of retained trees, up to the next planned harvest, a time frame of at least 40 years. For regeneration harvest, EA should find much less carbon gain because far fewer trees will be retained to have an increased growth.

Also, the BLM must not do the usual measurement of carbon sequestration in seedling growth (as figured in Appendix C of the WOPR and elsewhere) because primarily natural regeneration will be used, whereas BLM's usual calculations are based on replanting, primarily Douglas fir, with hundreds of trees per acre. Reforestation is supposed to be very different in this project, and future projects based on this pilot. Therefore, carbon sequestration calculation must be different.

---

[18] Management of POC in SW Oregon FEIS. 1/2004. page 2-18.
[19] Management of POC in SW Oregon FEIS. 1/2004. page 2-22.

The purpose of this project is to enhance brush species, and keep that brush on the landscape for as long as possible. The EA should show that, compared to overstory trees, brush sequesters and stores very little carbon.

When considering carbon impacts of fossil fuels, don't forget to include the petroleum products used:
* in logging equipment, hauling lumber to mills, and in milling wood products;
* by loggers and inspectors commenting to the project area in vehicles;
* by BLM to get to the project area to prepare the sale, do the wildlife surveys, marking stand boundaries, etc.
*in fertilizers and herbicides, including road-side herbicides used in preparation for logging equipment use, and the equipment used to apply chemicals.

When considering the carbon impacts of using fossil fuels for this project, consider the EPAs web site[20] for calculations of carbon emissions. If the BLM has different conclusions than the EPA on the carbon emissions from fossil fuels, the EA should explain why the EPA has different figures.

The EA should be very clear on what is being measured and the time frame for the measurement. Since this is a pilot project, it is even more important for correct, peer reviewed measurements to be used, as it could be the basis for thousands of acres of regeneration harvests to follow.

For a regeneration harvest in this older stand, the data will show that the BLM will loose a large amount of carbon to the atmosphere, that could be lost forever because of BLM's plans to continually harvest this stand through regeneration harvests on a rotational basis. If current regulations continue (WOPR), the BLM would practice short-rotation forestry on this stand. Since the stand will never again store as much carbon as it does today, the EA should consider not harvesting it in the no-action alternative due to carbon loss. We are facing imminent danger of global warming, now. It is important for at least *public* forests to not add to that problem, a problem that threatens global destruction like no other problem we have ever faced. If the BLM concludes that we will simply gain back lost carbon in 100 years, the BLM must consider that 100 years from now is too late. We must reduce our carbon impacts now, and no later than in 10 years, not 100 years.

The EA should consider that Oregon's Coast Range has been found to have the ability to store more carbon per acre than virtually any other place in the world, including tropical rain forests. Because private forest lands cannot be forced to help protect the earth's climate, public forests in the coast range are even more important for sequestering carbon.

There are no additional jobs gained by regeneration harvest than by thinning, so the need for jobs cannot be used as a good reason to contribute to carbon loss through forest regeneration.

[20] http://www.epa.gov/cleanenergy/energy-resources/calculator.html#results

8. Herbicides and Mountain Beavers

We assume no herbicides will be proposed in any alternative, including road-side spraying. The EA should confirm this is the case. The EA should also disclose if any herbicide use authorized under a different NEPA decision could be used in the project area, and if so, what it's impact on the pilot project purpose and need is. If the BLM believe the project will cause non-native or noxious weeds, the BLM should consider manual treatments, which would contribute to the project's economic and social needs (jobs).

We also assume that Mountain Beavers will not be kill-trapped for this project, as is the practice on the adjoining industrial forest lands. If this is inaccurate, the EA should disclose the purpose and the extent of this practice.

9. Retention areas, old growth trees, and maps

The Franklin Johnson proposal for this project is to leave abundant retention trees. Riparian buffers can only be used as a small part of that retention.[21] The EA maps should be clear on where aggregate and dispersed retention is being left.

Numerous old growth trees are scattered through the stand. These trees must be protected from damage by sufficient retention areas around them. The BLM claims this project will protect old growth. "Conservation of older stands and trees anchors our proposed restoration strategy because of their ecological and cultural significance."[22] Therefore, an old growth tree must not be left isolated, with the surrounding forest clearcut around it, leaving the tree susceptible logging damage, blow down, or sun scald. Protection of old growth is a major component of this project, and that includes fully buffering the scattered old growth trees in the stand.

The BLM should also provide a .kmz google earth file of all the project maps. The Roseburg BLM is providing that for their wet-forest pilot project, the Umpqua National Forest does it for their timber sales, the Coos Bay BLM can and should do it too. The .kmz files should be posted on your web site, and include road locations, stand ages, murrelet protections, old growth locations, retention areas, stream buffers, survey and manage protections, and anything else of importance.

This is a pilot project and as such could guide the management of thousands of acres of mature forests on BLM land. A pilot project is a good time for the BLM to begin to incorporate modern mapping information for public use. Google Earth is a free program. Anyone can use it, unlike more expensive GIS mapping programs. The Coos Bay BLM should catch up with the other federal agencies that distribute information for the general public. NEPA requires that "high quality" data be used to inform the public. Google

---

[21] A Guide to Creating Diverse Early Successional Ecosystems through Variable Retention Regeneration Harvest on the Coos Bay District of the BLM. June 1, 2011. Page 3. "Limitations on credit for riparian buffers are necessary"

[22] Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon. Drs. Jerry Franklin and Norman Johnson. November 30, 2010. Page 4. Posted on the Coos Bay BLM Pilot Project web site.

Earth is just normal data these days, not even high quality, so it's time for Coos Bay BLM to provide kmz files to the public.

10. Tailhold and Guyline trees

Surrounding the area to be logged in section 17 are very old forests (450 years old) and 160 year old occupied marbled murrelet habitat. The EA should disclose the impacts of tailhold and guyline trees that will be used to yard the Wagon Road sale, on these older forests. The BLM has a policy, written in a 2009 CE (is there a more recent policy?), detailing what is allowed in the use of BLM tailhold and guyline trees. It says:

> "Use of tailhold and guyline trees to facilitate logging operations …. Use of tree protection devices would be required; however, trees may be damaged on occasion as a result of bark or skyline slip resulting in partially girdled trees. Trees that are partially girdled, which may die within a few years, would remain on site to provide snag or coarse woody habitat for wildlife."[23]

When the Coquille Tribe used BLM old growth trees for yarding in Section 5 (just 4 miles south of this project), those trees were cut down, put on a log truck, and removed. We did not understand how this was in compliance with the BLM policy for tailhold and guyline trees. We even saw a 400 year old tree the Tribe cut on BLM land in the area used for yarding. We have asked the BLM several times to explain how the Tribe could use old growth trees, *in an occupied marbled murrelet stand,* without protective devises, and not leave them on site if they did need to be cut down. We have never received an adequate answer.

Now we are facing a similar situation, with occupied marbled murrelet forests surrounding a proposed regeneration harvest that will use guyline and tailhold trees to yard the sale, which the Coquille Tribe is helping to design the logging system. This EA must fully disclose the impacts of guyline and tail hold trees to old growth trees outside of the harvest units. Will they be protected? If not, why not? If they have to be felled, will they be left on site? If not, why not? If there is a more recent BLM guyline/tailhold policy, please refer to it. An explanation of how the Tribe was allowed to violate the previous policy would also be helpful.

11. Roads

The current road density for this watershed averages 4.1 miles per every square mile![24] Any project with "restoration" in the name MUST address this serious condition. The EA should include an alternative that considers full decommissioning of unneeded, dead end, and redundant roads.

Include an alternative in the EA that builds fewer road miles. For each segment of new road the BLM is proposing to build, the EA should disclose how many acres of harvest

[23] Categorical Exclusion Review. DOI-BLM. 9/21/09. Fiscal Year 2010 Tailhold and Guyline requests. Pg 1.
[24] EFC Watershed Analysis. Page V-25

that road will access. For the longest road segments accessing the fewest acres, an Alternative should consider dropping that segment of road. For instance, if a one-mile long road will only access 5 acres to be logged, it is not worth it. Any road proposed for decommissioning must have meaningful decommissioning, such as slash pulled over the road, tilling excessive compaction and conifers replanted in the road bed.

12. Survey and manage

The Coos Bay BLM must do surveys for the survey and manage component of the Northwest Forest Plan. At the public meting, the BLM disclosed that some surveys were done in this area when it was being considered under the East Fork Coquille EA, years ago. However, those surveys are old. The BLM must do new surveys because there could be significant changes in the plant communities in that time. Surveys for species adapted to older forests must be done because there are many areas of this project that are much older than 70 years.

Red Tree Vole surveys must be done using BLM standards and policies. For RTV surveys on Tribal land, the Coquille Tribe has stated that: "It is true that the Tribe must follow the same standards and guides on adjacent federal forest lands; however the Tribe is not mandated to follow BLM policies, procedures, or instruction memorandum recommendations."[25] Therefore, if the Tribe is doing the BLM Survey and Manage, the Northwest Forest Plan protocols must be used.

13. Cumulative Impacts.

The Wagon Road Pilot Project unit is near or next to the East Fork Coquille timber sale units and the Weaver Sitkum units. The very same logging roads will be used for both projects, along the very same streams. The Wagon Road Pilot Project EA should disclose which of the near-by units have been sold, which have been logged, and which units are yet to be sold and logged. The EA should consider the cumulative watershed impacts of new roads and ground-based equipment, as well as the cumulative impacts to wildlife. Spotted owls have been known to leave a thinned area, which they could do in the near-by thinning projects, so pay special attention to cumulative impacts to near-by spotted owls. For more information on impacts of the Weaver Sitkum units, which are on either side of Section 17, see our April 25 Protest of the Green Chain CT Timber Sale submitted to Coos Bay BLM.

Other cumulative impacts: The Coquille Tribe is clearcutting an old growth forests, called the "Additional Acres" timber sale, just four miles directly south of this project, in the same watershed, with logging trucks likely using the same haul roads. Here, the Tribe is clearcutting (leaving as few as 8 trees per acre) spotted owl habitat that is classified as "High Quality" habitat, defined under Recovery Action 32 in the 2008 NSO Recovery Plan, which that plan recommended be protected.[26]. The Tribe claims they do not have to

[25] Response to Alder Lost 40 Rasler timber sale comments. The Coquille Tribe. April 7, 2011. Page 6.
[26] Recovery Plan for the Northern Spotted Owl. USFWS. May 2008. Recovery Action 32 is described on page 34. For more information, see section on Tribal Management of 58,000 acres, below.

protect high quality NSO habitat and will not follow the recommendations of the NSO Recovery Plan.

The Coquille Tribe informed the US Fish and Wildlife Service that they will not comply with this key recommendation in the Northern Spotted Owl Recovery Plan because:

> "Although the stands in this BA meet the intent and definition of RA 32, Secretarial Order 3206 places the burden of endangered species recovery on Federal and State Governments first and Tribes last. As interpreted, the federal government must show that recovery actions on tribal lands are absolutely essential in preventing species extinction."[27]

Therefore, the EA should assume that all of the lands owned by the Tribe in the vicinity of this project will not be afforded protections recommended by the USFWS for recovery of the Northern Spotted Owl. The resultant cumulative impacts to spotted owls from the Wagon Road Pilot Project must be considered in the EA.

The Pacific Connector Pipeline is proposed to go within a mile to the south of the project area, clearcutting several stands of marbled murrelet habitat near this project. This 95' wide clearcut through the BLM managed lands will have considerable impacts that will contribute to cumulative impacts to all sales in the area. The EA should give us an update of where the latest preferred pipeline route is through the project area, the mitigations approved for the pipeline impacts within the project area, and the status of the pipeline. The EA should discuss if the BLM preparing an EIS for pipeline impacts and if so, when scoping on that project will begin.

14. Jobs

A big part of the Pilot Project purpose and need is about providing local jobs. Therefore EA should consider all the cumulative aspects of the local economy. Making a statement like xyz mmbf provides xyz jobs is a shallow analysis.

The "jobs" economic analysis should compare the amount of jobs provided by regeneration harvest vs. the usual BLM thinning sales. The thinning sales have produced 150% of Coos Bay BLM's timber target over the last 5 years, so consider that figure when figuring mill jobs.

The EA should consider the export market's influence on jobs. The Pacific Northwest Research Station announced May 21 that for the first quarter of 2011, West Coast softwood timber exports were up 50.5 percent from the first quarter of 2010. Log exports from Oregon and Washington totaled 379.5 million board feet. Logs and lumber went primarily to China and Japan as well as to Taiwan, Indonesia and South Korea, exporting mill jobs with them.

On the other hand, the Bureau of Land Management exceeded its volume of trees offered for sale in Oregon and California in 2010. According to agency data, the BLM was

[27] Biological Assessment #CFP6-01-2009. Coquille Indian Tribe Chu-aw Claw-she No3 Additional Acres TBA 10/21/2009. Page 1-2.

congressionally financed to offer 184 million board feet of wood, and it offered for sale 192 million board feet.[28] Specifically, Coos Bay BLM is averaging over 150% of its 27 mmbf annual timber target.

The EA should consider if logs from a BLM regeneration harvest could ever make a dent in the jobs lost to the log export market. Because logs from BLM lands cannot be exported, for every raw log that is exported, the BLM would have to produce two logs to make up for the mill jobs lost and to increase local jobs. If the export market has grown 50%, how many more logs can the BLM realistically produce to grow local jobs.

If this pilot project is tied to local jobs, while local jobs are being lost through the export market, the export market is relevant to this project and must be considered in the EA.

15. Tribal Agreements with the BLM

At the public meeting in May, we were told that the Coos Bay BLM and the Coquille Tribe have a MOU for working together on the Coos Bay Pilot Project. Thank you for posting the September 2010 Cooperative Agreement on your web site. Please post any updates to that agreement when it concerns the Wagon Road Pilot Project.

We were also told that, even though the Tribe is doing about 50% of the work on this project, they are not getting any compensation. Therefore, the BLM is looking for some funding sources to help with that compensation. Since that time, Mark Johnson has estimated the Tribe will be paid $100,000 for participation in this project[29].

The EA should have an economic section that describes all the income expected, and the costs of this project, including funding for the Tribe's work. Especially since this is a Pilot Project, the economic impacts of this project are important to disclose and consider. Since the Tribe considers this pilot project a model for the Tribe to mange 58,000 acres more BLM lands, the EA should compare the cost of paying the Tribe to do the ID Team work, compared with the BLM doing the same work. The EA should also describe what BLM budget items will fund the Tribal work.

The current "Cooperative Agreement" between the BLM and the Coquille tribe is restricted to "improve watershed health".[30] Therefore, we expect this project to improve watershed health, not further degrade it. The only "goal" of the cooperative agreement is "restoring aquatic and upslope habitats to benefit native fish and wildlife species and water quality". Therefore, the Tribe's work on this Pilot Project means that native fish and wildlife species and water quality must benefit from that work.

---

[28] http://www.eugeneweekly.com/2011/06/09/news.html#2
[29] Email from Mark Johnson to Francis Eatherington, June 7, 2011.
[30] Cooperative Agreement No. L10AC20045 Coquille River Basin Watershed Restoration, Coos Bay District, Oregon Cooperative Agreement No. L10AC20045. 9/15/2010. Posted on the BLM web site as the agreement authorizing the Tribal work on this project. "Restoration of the Coquille River Watershed", is the *only* reason for the BLM to pay the Tribe for work on this project.

If fragmenting mature forests, or increasing peak flows, in a watershed that is far below historical acres of mature forests, does not improve watershed health, then the BLM and the Coquille Tribe would need to work under a different cooperative agreement – perhaps one with an economic emphasis instead of a watershed restoration emphasis.

Degrading native fish and wildlife species habitat is not allowed under this Cooperative Agreement. The Coquille Tribe is required to submit quarterly reports on the expenditures received through this Cooperative Agreement. The BLM should provide those reports to the public since, in effect, the public is also having to work with the Tribe on this Cooperative Agreement Pilot Project.

16. Pilot Project for Tribal Management of 58,000 acres

At the public meeting for this pilot project, the Tribe invited John Gordon to speak about the Tribes expected outcome of this pilot project: management of 60,000 acres of the Coos Bay Wagon Road BLM lands in Coos County. The Coos Bay BLM Pilot Project web site also showcases the Tribe's proposal to take over management on 58,000 acres of BLM land on its front page.

We are opposed to this. To begin with, the Tribe's proposal has no place in this Pilot Project that has a different purpose than transferring management to the Coquille Tribe. But it seems to be a part of this project nonetheless, so we will include our concerns in this scoping document.

Our primary objection is that the Coquille Tribe has demonstrated through their regeneration harvests of high-quality spotted owl habitat (see section 13 above) that their forest management goals are primarily to enhance economic returns, rather than enhancing wildlife habitat. The BLM has greater environmental protection goals.

The Tribe has repeatedly used tribal status to circumvent federal wildlife protections. For instance, in the Biological Assessment for the "Additional Acres" timber sale, the tribe wrote: "Although the stands in this BA meet the intent and definition of RA 32, Secretarial Order 3206 places the burden of endangered species recovery on Federal and State Governments first and Tribes last."[31] Therefore, the Tribe concluded, they were able to virtually clearcut a RA 32 forests (that is, high quality spotted owl nesting habitat, as defined in the NSO Recovery Plan). No BLM district in Oregon has been logging RA 32 forests because they are complying with the recommendations of the Spotted Owl Recovery Plan. The Tribe has stated clearly they will not comply with the recommendations of the NSO Recovery Plan. The USFWS responded to the Tribe:

> "The Tribe has determined the removal of 61 acres of spotted owl NRF habitat may affect, is likely to adversely affect spotted owls because implementation of the proposed action will reduced the amount of available spotted NRF habitat below the threshold value of 40 percent."
>
> "The Tribe has provided their rationale for deciding to move forward with the

[31] Additional Acres Biological Assessment. Coquille Tribe. 10/21/09. Page 1.

> harvest of these stands… citing Secretarial Order 3206, which places the burden of endangered species recovery primarily on federal and state governments and secondarily upon Tribes. In an email, tribal representatives provided the following information"…
> "An indian tribe does not qualify as federal lands. The NSO Recovery Plan expressly applies to "federal lands."

Therefore, the Tribe must not be given additional spotted owl habitat to manage because they will likely clearcut it, just as they did with the best spotted owl habitat on the 5,400 acres of BLM land they were given in 1997.

Concerning the high quality spotted owl habitat in the Additional Acres timber sale, the USFWS continued in their Biological Opinion:

> "The Tribe has not conducted protocol surveys designed to detect spotted owls in the area of the planned harvest unit… The Tribe plans to implement portions of this proposed action *within the critical breeding season…* While recognizing Secretarial Order 3206, maintenance of "high quality habitat" on non-federal lands is encouraged."[32]

In spite of USFWS encouragement to protect high quality habitat, the Tribe clearcut it (or is clearcutting it), leaving as few as 8 trees per acre. The Tribe writes that "…the Tribe is not mandated to follow, BLM policies, procedures, or instruction memorandum recommendations"[33] when it comes to protecting the Spotted Owl.

The Tribe has proposed managing the 58,000 acres of Coos Bay Wagon Road Lands "according to all applicable plans for federal forest lands"[34], but their ideal of "applicable plans" is different than expected. The Tribe promised the same thing for the 5,400 acres of BLM land they were given earlier, and they clear cut high-quality spotted owl habitat even though the BLM would not have done so. The Tribe claims wildlife protections are a "policy", and so are other environmental protections, like protections for Survey and Manage species and Port Orford Cedar. The Tribe claims they don't have to follow these federal land policies.

In another timber sale, the Rasler-Lost-40 timber sale, the Coquille Tribe responded to public comments by saying that: "It is true that the Tribe must follow the same standards and guides on adjacent federal forest lands; however the Tribe is not mandated to follow BLM policies, procedures, or instruction memorandum recommendations."[35]

The Tribe then explains that protections of Port Orford Cedar from *Phytophthora lateralis* is a BLM policy, so they will not follow it. Instead, they have their own "tribal management strategy for controlling the spread of POC Root Rot diseases."[36] What they will do instead is never disclosed in any public documents, so we have no way of

---

[32] USFWS Biological Opinion. 4-13-10, Additional Acres timber sale, page 49 and 56.
[33] Comments and Response to Alder (Lost 40) EA comments. Coquille Tribe. April 7, 2011. Page 6.
[34] Slide 5 on the Pilot Project slide show posted on the Coos Bay BLM Pilot Project web site.
[35] Comments and Response to Alder (Lost 40) EA comments. Coquille Tribe. April 7, 2011. Page 6.
[36] Comments and Response to Alder (Lost 40) EA comments. Coquille Tribe. April 7, 2011. Page 7.

knowing if it is as protective as the BLM NEPA developed procedures.

The Tribe has also determined that protections for Survey and Manage species is a BLM policy, not a regulation they must follow. The Tribe will follow their own RTV policy "by developing a Tribal management direction for protection of known Red tree vole nests on Tribal lands. No additional compliance measures are needed as this species is not listed as threatened or endangered under the Threatened Endangered Species Act, and has no state protection requirements."[37]

Other reasons why the Tribal management of an additional 58,000 BLM acres, as proposed on the Pilot Project web page, is a bad idea: When we tried to enforce the Northwest Forest Plan in the Chu-aw-Clau-she timber sale in 1999 through an administrative appeal, we were told we would have to pay a bond of $39,000 to appeal. Citizens can appeal BLM sales without posting a pond. The BIA also informed us that only people with economic interests could appeal timber sales, either the seller or buyer of the sale. This is very different than the BLM appeal procedures, where any interested public can appeal decisions. In 2001 the Tribe was caught logging in violation of a court order over the long New-Years holiday. When the Court reconvened after the holiday, they fined the BIA for the illegal logging. It is unlikely the BLM would do such a thing.

The public has a much harder time getting documents from the Coquille Tribe than from the Coos Bay BLM. For instance, unlike the BLM, the Tribe refuses to post any timber sale documents on their web site; the Tribe refuses to have an interested-party email notification list; the Tribe refuses to accept electronic comments; the Tribe refuses to respond to public comments unless the public specifically requests their response, and then the Tribe refuses to email their response. If electronic documents are sent on a CD, they are in a picture form, not searchable text. The Tribe requires an appeal at the same time as comments are accepted, an appeal we know we cannot bring according to the BIA regulations. In other words, the Tribe makes it as hard as possible to have meaningful public input or oversight.

For this Pilot Project, the Tribe is identified taking the ID Team Leader job. But when "Contacts" was handed out to the public, no email address was provided for the project's ID Team leader, only a postal mailing address. On the BLM side of the Contact list there was a clear email address.

In summary, allowing the Tribe to manage an additional 58,000 acres of BLM lands will weaken federal environmental protections as well as the public participation process.

[37] Comments and Response to Alder (Lost 40) EA comments. Coquille Tribe. April 7, 2011. Page 6

This concludes our scoping comments on the Coos Bay Wagon Road Pilot Project. We hope to see our comments reflected in the EA.

Sincerely

Francis Eatherington
Cascadia Wildlands
P.O. Box 10455, Eugene Oregon, 97440
Responses may be sent to our field office at:
886 Raven Lane, Roseburg, OR 97471

541-643-1309 francis@cascwild.org

and

George Sexton
Klamath Siskiyou Wildlands Center
PO Box 102, Ashland, OR 97520
gs at kswild .org