



July 25, 2011

John Gerritsma
Field Manager
Ashland Resource Area
Bureau of Land Management
3040 Biddle Road
Medford, Oregon 97504

In Reply To: Pilot Joe Timber Sale EA

Dear Mr. Gerritsma:

The American Forest Resource Council (AFRC) is pleased to provide this information to be included in your planning of the proposed Pilot Joe Timber Sale. 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 Medford 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.

AFRC is very disappointed in how the "Secretarial Pilot Demonstration Projects" have been implemented by the BLM. We are also disappointed that the comments and suggestions we provided during the Scoping phase of this project seem to have been ignored as none of these appear in the Environmental Analysis. We are further disappointed that the effort has not resulted in any additional vegetative removal beyond what was proposed prior to the initiation of the Pilot. The expected 12 mmbf/acre removal is now anticipated to be 5 mmbf/ac which is what the BLM has historically removed using historic silvicultural treatments. Lastly, we are very concerned that the EA does not disclose how this proposed action complies with the Western Oregon Plan Revision as this is the current resource management plan the Medford District is operating under.

The signature page welcomes comments to the EA, particularly new information, or evidence that the analysis is flawed or incomplete. Based on the questions we posed during the Scoping phase, we believe the analysis is both flawed and incomplete.

2300 Oakmont Way, Suite 205
Eugene, Oregon 97401
Tel. (541) 342-1892

The introduction of this EA describes why the Secretary of Interior designated this project. It says, "(P)art of his intent was to help inform long term planning of BLM and O&C lands". It also says, "(T)he Secretary and Oregon Congressional Delegation have expressed a deep need to break existing administrative and legal gridlock in order to move forward with ecosystem restoration and with the economic recovery of SW Oregon." It was hoped that the BLM would be able to use the principles of Drs. Norm Johnson and Jerry Franklin to restore management to much of their currently untreated land. Unfortunately, the BLM decided to avoid these "controversial" lands in favor of treating small areas to be used as "classrooms in the woods" to show how the Johnson and Franklin restoration principles will look when implemented. In our Scoping Comments we asked:

- What decision making process occurred that reduced the size of the project from 50,000 acres within the watershed to the proposed 974 acres of treatment? How did the BLM get from 50,000 acres of BLM land in the watershed to commercially treating 367 acres? We would like to see the number of acres in this watershed that are in need of treatment, and explanations to why the remaining acres are not being treated.

None of these questions were addressed in the EA. The Secretaries ultimate goal in establishing the Pilots was to see if the principles of Drs. Franklin and Johnson could be used to break the gridlock and result in more land being treated. Since the BLM decided to avoid all the issues which have caused the gridlock, this project does little to meet the Secretaries goal.

It is a well established fact that the majority of the Medford District is suffering from low health and vigor due to overstocking. With average growth rates of 0.82 inches per decade in this analysis area, it is obvious these stands are not healthy enough to withstand a bark beetle attack. SW Oregon's public land is burning up every summer and something needs to be done about it. We feel the answer is to treat the entire land base, not just the "uncontroversial stands". The habit of "giving in to controversy" will not help break the legal gridlock or help recover SW Oregon's economics. In our Scoping Comments we asked:

- What are the potential negative effects of not treating land within the 5,000 acre analysis area? (refer to the Sampson Cove EA)

This question was also not addressed in the EA. In reality, the question should have been "What are the potential negative effects of not treating land within the 50,000 acre watershed?"

The BLM held a workshop on March 8th 2011 to develop selection criteria that would be used to create an INITIAL pool of stands. This did not occur as the BLM had already narrowed the pool of stands to those which were analyzed in the previously issued China Keeler EA. This decision reduced the pool of stands from 50,000 acres to 5,010 acres of which only 1,938 acres were proposed for needing management activities. We feel that this decision compromised the ability for this project to make any changes to the current status of the BLM being able to manage the entire landscape. By doing this, the pilot is only treating land that the BLM has already been successfully treating thus did not address the factors limiting the BLM from treating the majority of its land base.

The analysis also doesn't display the effects of not managing any of the riparian reserves. The riparian areas are usually in the neighborhood of 30% of the landscape. By not treating these areas, that 30% suffers from the consequences of the no action alternative. There is plenty of research that shows the riparian objectives can be met by thinning the competing understory. It is irresponsible for the BLM to decide that thinning the riparian areas is not worth the effort.

In our Scoping Comments we asked:

- 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.

We wrote this under the assumption that an economic analysis would be done but we were mistaken as the EA did not display a detailed economic analysis. We are perplexed at this as it is apparent from the current debate taking place in Congress that the only way federal lands are going to be treated is if they pay for themselves. The BLM cannot rely on appropriated dollars to get the work done. Because these lands are in Matrix land allocation it is very important to make money for the O&C counties. This analysis should be displayed in the EA so that the public can decide whether this objective is being met.

On page 2-20, #3 the EA explains the rationale for eliminating two stands from the project. The EA states that the unit near the center of section 34 was eliminated because it was not strategic in its reduction of fire threat abatement to the LSEA's and that a unit in the east portion of section 7 was eliminated because the interior of the unit was not facing competitive stress, and would not be a good candidate for restoration forestry prescriptions. We feel it is more likely that the real reason why these units were dropped is because environmental groups didn't want the BLM to build any new roads. They were then dropped to avoid controversy.

AFRC believes that the Carbon Storage analysis is flawed as it does not account for the high probability of wildfires consuming stored carbon as a result of NOT treating the area. The Environmental Consequences of the No Action Alternative should include the loss of carbon due to wildfire. The Action Alternatives should also show this effect and be adjusted for the reduced threat of wildfire due to treatment. The current analysis is flawed and misleading as it only shows the potential decrease in carbon due to timber harvest.

On March 31, D. C. District Court Judge John Bates issued an order reinstating the Western Oregon Plan Revisions (WOPR). The Court said that the Secretary violated the Forest Land Management and Planning Act and the Administrative Procedures Act when he withdrew the WOPR. That being the case, all projects being proposed by the BLM in western Oregon must be designed to meet the requirements of the WOPR. The EA is totally silent on the WOPR, not mentioning it once in the entire document. AFRC believes that this is a major flaw in the document and leaves it wide open to litigation. Before a decision is made, the EA must describe how the project complies with and is in accordance with the WOPR.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision making process for the Pilot Joe Timber Sale. 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.

Sincerely,

Brian Tenbusch
AFRC Western Oregon Field Forester
American Forest Resource Council