



May 7, 2012

John Gerritsma
Field Manager
Medford District BLM
Ashland Resource Area
3040 Biddle Road
Medford, OR 97504

In Reply To: Pilot Thompson Project Scoping

Dear Mr. Gerritsma:

American Forest Resource Council (AFRC) is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC represents over 50 forest product businesses and forest landowners. AFRC's mission is to create a favorable operating climate 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 regarding access to, and management of, forest lands. Many of our members have their operations in communities adjacent to the Ashland BLM resource areas, 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 is concerned with the delineation of LSEA's on this project and their long term implications. The BLM is operating under the current spotted owl recovery plan, which along with the NWFP already restricts harvest and retains "denser forest patches" through several strategies including owl nest patches, core areas, home ranges, RA-32 areas, riparian reserves, reserve allocations, and the large LSR block adjacent to the project area to the west. Drawing a line around another block of land and labeling it "LSEA" is unnecessary and above and beyond the stated general goal of this project to "illustrate how forests can be managed utilizing the principles of Franklin and Johnson." The spotted owl recovery plan is the current rule and the Fish & Wildlife Service has ongoing research and planning to continuously update and improve this plan, including designating additional land bases for the owl's recovery. This additional block of land set aside for the spotted owl is outside of the scope and purpose of this project, and will only succeed in restricting yet another piece of ground from management.

AFRC viewed several of the roads planned for decommissioning /obliteration. Some of these roads such as the spur in S27 of T38SR04W and S6 of T39SR04W are in poor locations on the landscape and are valid considerations for removal. However, a road such as the one that accesses one of the LSEA's in S32 of T39SR04W is a good road in a good location that provides access to a large block of land. The culvert at the start of this road also appears to be a brand new install. AFRC cautions against removing such a road. We previously expressed our concern with labeling this block as an LSEA. If this road is obliterated, opponents to timber harvest will also call this block a "roadless area," which will further restrict activity. In short, we feel that if this road is removed, it's never coming back, and stands in this area will never be treated. We hope the BLM recognizes these implications when proposing such activities.

Drs. Johnson & Franklin recommend treating lands on a large spatial scale across entire watersheds in order to fully evaluate cumulative effects of the treatments and to consider all restoration needs. The expectation is that the watershed would not be reentered until the next cycle. They state in particular that dry forest actions "need to be taken on a substantial portion of the landscape." AFRC felt that one of the shortfalls of the Pilot Joe was that it did not fully illustrate these principles since the acreage was reduced substantially. It appears from the planning map and field visits that the BLM is proposing more acreage for treatment on this project. AFRC is happy that the BLM is taking the necessary steps to address all of the stands that need treatment. This includes constructing new roads to gain full access to the needed stands that could not be economically harvested with helicopter systems. Road construction is a necessary activity if active management is desired, and we urge the BLM to continue to look for opportunities to expand their road system to ensure this management. Many of the units proposed for treatment have low timber volume that would be difficult to yard with helicopter systems and we are glad that the BLM is proposing an alternative that would construct roads to access these units with cable or ground systems. We recommend the BLM to do a thorough economic analysis to ensure the viability of any stands that are proposed to be harvested with helicopter systems before implementing them.

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. Opportunities for dry weather operation during the wet season are critical to achieve this goal. The scoping notice is not entirely clear on the specifications that new roads would be built to, and AFRC would like to urge the BLM to consider wet weather hauling opportunities when creating these specs. Option to rock these new roads is crucial to achieving the goals listed above and we feel that permanent rock road construction will have both short term and long term benefits to both the BLM and its customers. We understand BLM's financial challenge of maintaining a large road system; however, there are ways to negate these costs while still adding critical new roads to its system. Removing culverts, waterbarring, and closing a rock road to vehicular traffic is a relatively inexpensive practice that a prospective operator could afford to do if given the opportunity to log in the winter months. We urge the BLM to

conduct a thorough economic analysis to determine where permanent rocked roads can feasibly be constructed and to pursue those opportunities.

AFRC would like to see all timber sales be economically viable. Appropriate harvesting systems should be used to create an economically viable sale and increase the revenues to the government. We would like to see flexibility in the EA and contract to allow a variety of equipment access to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential bidders, thus driving the bid value down. Including language in the EA and contract that specifies damage tolerance levels rather than firm restrictions gives the operator flexibility to utilize their equipment to its maximum efficiencies. For example, quantifying a residual stand damage threshold rather than entirely restricting activity during certain months (or restricting log lengths) will allow an operator the flexibility to alter their yarding techniques to meet the threshold throughout the seasons instead of having to completely shut down during certain months. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest.

AFRC is happy that the BLM is proposing riparian reserve treatments. It has been well documented that thinning in riparian areas accelerates the stands trajectory to a mature successional condition and has no affect on stream temperature with adequate buffers. Removal of small diameter suppressed trees has an insignificant short-term affect on down wood, and ultimately a positive effect on long-term creation of large down woody debris, which is what provides the real benefit to wildlife and stream health. In regards to the uplands, Franklin & Johnson mention “re-establishing more characteristic ground cover and favoring fire resistant species.” The prescription mentions cutting gaps as part of the variable density thinning. AFRC would like to encourage the BLM to consider the regeneration potential of these gaps after harvest. Is natural regeneration a viable option or will these sites require planting to ensure an adequate growing stock? Regardless what Franklin & Johnson mean when they refer to “characteristic ground cover,” we would like the BLM to consider their long-term timber supply when addressing these gaps.

Marketing these sales to fit your customers’ needs will also increase their viability. The trend of increasing complexity of harvest prescriptions makes lump sum type sales difficult to accurately cruise and appraise. These pilot projects in particular will have complex prescriptions with variable density thinning, skips and gaps. We urge the BLM to closely consider the products being sold and the type of harvest being proposed when determining the type of contract used. When scaled sales are used, consideration should be given to the products that the local mills are capable of utilizing. Minimum log removal specifications should be catered to meet the minimum log size that the mills can process.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision making process for the Pilot Thompson Project. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or ageissler@amforest.org.

Sincerely,

Andy Geissler
Western Oregon Field Forester
American Forest Resource Council