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Boise Cascade

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:

I am the Wood Procurement Manager for Boise Cascade Wood Products, L.L.C. in Western Oregon, and am writing to provide my comments to be included in your planning of the proposed Pilot Joe Timber Sale. Boise Cascade has wood products manufacturing plants in the Medford area including a veneer mill, 2 plywood/PLV mills and an engineered wood products mill. These manufacturing facilities are dependent on a reliable timber supply from public and private lands, including the commercial value timber being developed by the Pilot Joe timber sale as well as future timber sales developed by your district forests. The management on these lands ultimately dictates not only the viability of our business but the viability of other mill facilities inside and outside of the Rogue Valley and will impact greatly the economic health of the communities within which we are located.

I have been involved in and have attended almost every field trip and seminar involving the development of the Pilot Joe project and have attended multiple meetings of the Small Diameter Collaborative which is meant to be a vehicle for public collaborative participation on forest management issues such as this one. I appreciate the intent for which these pilot projects were proposed, which was to "gauge the degree to which active forest management, including timber harvest with a focus on ecosystem restoration, has a broader base of social acceptance than other more traditional management practices" which hypothetically could reduce the incessant litigation of most of the timber sales that you offer. I must say however that the design and planning of this project area does not serve the forests, the public or our forest industry in Southwest Oregon well. I am very disappointed in how the "Secretarial Pilot Demonstration Projects" have been implemented by the BLM, seeming to avoid any and all controversy and difficult forest management issue at every point that it was encountered. I am also disappointed that the comments and suggestions which we provided during the Scoping phase of this project seem to have been ignored since none of these concerns or issues appear in the Environmental Analysis. The expected 12 mbf/acre removal which had been proposed early on in the process is now

anticipated to be 5 mbf/ac, which is roughly what the BLM has historically removed using historic silvicultural treatments. The Pilot Project in no way meets the requirements of the Oregon and California Lands Act of 1937 (O&C Act) which requires the BLM to manage O&C lands for permanent forest production. This objective is clearly not being met, as evidenced by the fact that of the roughly 3600 acre plan area, only 299 acres are being commercially treated and 1573 acres are being placed in "Late Successional Emphasis Areas" which will receive no vegetative treatment at all as well as many additional acres lying within the riparian management areas, which we were originally led to believe would be partially treated but have not been treated in order to avoid further controversy. Lastly, I am very concerned that the EA does not disclose how this proposed action complies with the Western Oregon Plan Revision which is the current resource management plan that the Medford District should now be 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 posed by us during the Scoping phase, the analysis is both flawed and incomplete.

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 the Scoping Comments our industry representatives asked the BLM to identify:

- What decision making processes needed to reduce 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 only being able to commercially treat 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 and are currently at very high risk of catastrophic wildfire. S.W. 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 AFRC 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?" I firmly believe that the areas proposed for non-treatment as Late Successional Emphasis Areas are at extreme risk of catastrophic wildfire due to their higher location on the hillsides, overly dense stands of trees and dead and dying trees due to moisture competition. These areas have not received adequate analysis through "Relative Risk Assessment" to determine the probability of loss of habitat to catastrophic wildfire versus the small risk to the Spotted Owl and other heavy forest canopy wildlife users if these sites were thinned to an adequate degree in order to help avoid loss to these wildfires. This scientific methodology has been developed by qualified resource professionals in cooperation with Oregon State Universities College of Forestry. This analysis needs to be incorporated into the prescription for this planning area as well as other planning areas in Southwestern Oregon. Jerry Franklin is on the faculty at OSU and could easily obtain this analysis methodology by talking with Dean Hal Salwasser.

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. 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 Scoping Comments AFRC 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.

AFRC wrote this under the assumption that an economic analysis would be done but the EA did not display a detailed economic analysis. This is perplexing since it is apparent from the current debate taking place in Congress that the only way federal lands are going to be treated is if the treatments 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.

I believe 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. This should receive some form of relative risk assessment mentioned above as well. 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. I believe 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.

On page 2-20, #3 the EA explains the rational 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. I believe 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. This in and of itself is strong evidence that the implementation of the principles of forest management that is being proposed as a solution to the BLM's litigation problems based upon current laws and regulations will not achieve the Secretary's desired goals or the goals of the public and their elected congressional delegation.

Although, as mentioned above, many of my concerns and comments were essentially ignored, I have been happy to be involved in the planning, environmental assessment (EA) and public relations collaboration education 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 541-776-6606.

Sincerely,



Ken Wienke
W.O. Wood Procurement Manager

CC: Bruce Cartmel
AFRC
Mark Nystrom
Ken Wienke
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