



February 17, 2014

Jon Raby, Field Manager
Bureau of Land Management
Butte Falls Resource Area
3040 Biddle Road
Medford, OR 97504

In Reply To: Trail Creek EA

Dear Mr. Raby:

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 Butte Falls Resource Area, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon's forest sector employs approximately 76,000 Oregonians, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

AFRC is glad to see a purpose & need statement that recognizes the BLM's responsibility of producing a sustained yield of timber on their Matrix lands, as well as assuring a high level of volume productivity. Treatments on a portion of suitable stands analyzed should be designed to achieve these two needs. AFRC has voiced our concern with the long-term sustained yield status of BLM Matrix lands in the past on multiple occasions, and how that status affects our membership and the communities they support. The existence of some form of regeneration harvest is critical to achieving this timber yield. A program comprised solely of thinning will not provide the timber base for future generations that was promised by the O&C Act. We believe there must be a balance between treatments

designed to meet statutes such as the Endangered Species Act and those that meet statutes such as the O&C Act. The 75 acres of regeneration harvest proposed under Alternative 2, which represents approximately 7% of the treated acres and about a half of a percent of the BLM ownership in the Trail Creek Project Area, is hardly a balance; however, we believe it is an important step in the direction of a balance. We hope the BLM will take this small amount of regeneration harvest seriously in the context of sustainable timber management and recognize its importance in meeting the purpose and need of producing sustainable stands that contribute to future forest production. Many of our members have been in business for nearly a century, and they hope to be in business for another century at least. In order for this longevity to persist they need to know that the BLM is growing trees for the future.

In order to properly analyze the status of the BLM's long-term sustained timber yield we have requested that the BLM provide an age-class breakdown of the stands within their Matrix for each project. While Table B-2 on page 115 of the EA compiles stand age classes, it does so across all ownerships. This breakdown does little to analyze the status of the BLM's timber supply. Maps B-5 thru B-7 tell a bit of the story, but in the future we would like to see a age class comparison exclusively for the BLM.

Treatments that provide early-successional habitat are not only crucial to the sustainability of the timber supply, but also add diversification to the stands and to the landscape. The important role of early seral habitat has been recognized over the past several years, particularly its role in the context of biological diversity. Some of the recent science even suggests that high quality early seral habitats are more diverse than high quality late-seral habitats. So why then does the BLM state on page 50 that "proposed regeneration harvest in Alternative 2 would reduce structural components, and lower biological diversity?" What is this statement based on? Certainly not the latest science. These treatments would change the biological diversity, but not lower it. In fact they may even raise it. The assumed reduction in structural components is puzzling too. The Medford District ROD/RMP provides a slew of project design features for regeneration harvests that ensure such treatments retain structural. Those components are outlined in Appendix C. Since retention of large green trees, coarse woody debris, and snags are built in to the silvicultural prescriptions, what components will be reduced?

The EA makes clear that treatments under all alternatives are tiered to the Medford District ROD/RMP and the land allocations defined in it. However, based on Appendix B, it appears that factors other than the land allocations defined in the RMP are dictating management direction. Some of these directives include treatments that are in direct conflict with the adopted management plan and other legal obligations. The "Restoration Strategy" outlined on page 120 of the EA discusses some of these. "Maintain a diversity of age/size classes throughout the landscape. Promote contiguous areas of mature forest stands." These "contiguous areas of mature forest stands" are essentially what the Late-Successional Reserve system was designed to accomplish through the Northwest Forest Plan. However, this project is in the Matrix system. Direction exists to maintain certain levels of late-seral forest habitat in the Matrix system, but nowhere does it direct retention of "contiguous areas." Page 120 also recommends to "minimize the creation of

early seral stands on BLM-administered lands.” This direction is in clear conflict with the O&C Act and its’ mandate to manage for a perpetual supply of timber under the principles of sustained yield, not to mention in conflict with the earlier recommendation of a “diversity of age/size classes.” It is also in direct conflict with your RMP. Page 39 of the Medford District ROD/RMP describes 5 primary objectives for Matrix land. One of these is simply to “provide early-successional habitat.” How can the BLM implement a “strategy” that so clearly contradicts their adopted management plans? It is troubling for us to see this kind of clear direction in a BLM analysis for forest treatments on O&C lands in the Matrix considering its’ directive to promote a sustainable supply of timber.

Section B.7 of Appendix B also directs the treatment to “retain trees 150 years or older.” AFRC is opposed to any arbitrary age limit imposed in the Matrix. In this case why not 145 years? Or why not 155 years? Why would the BLM impose any age limit at all? Why not treat the stand according to the need of the stand? Section B.7 also states that in rare cases and older tree may be removed to benefit the stand. So why even have the limit mentioned in the EA at all? Page 122 identifies the “Van Pelt rating system” as the guidance that the BLM will use to identify trees over or under the age of 150. This referenced document was developed for use on Washington State DNR trust lands in eastern Washington, and there is no scientific support to apply Van Pelt to stands in southwest Oregon. Furthermore, the Van Pelt guidelines are not part of the Medford RMP and would require adoption through the NEPA public comment process if used as a District standard. Your RMP provides direction needed to maintain valuable structural components including large trees (ROD/RMP: pg 38-39). Additional constraints that place a specific age to these RMP directives is unnecessary, and also impossible to fully implement. It undermines the silvicultural prescriptions described and places an unnecessary time burden on the foresters responsible for implementing these treatments on the ground.

Alternatives 3 & 4 appear to be tiered to the above “strategy.” Page 139 of the EA states that “the purposes of alternatives 3 & 4 are to increase landscape resiliency by reducing stand densities.” When developing silvicultural prescriptions for this alternative we would like the BLM to consider the entire stand and the entire landscape in order to tier the results to the purpose. One of these prescriptions is based on the idea of skips and gaps. In past “restoration treatments” the BLM has implemented the “skips & gaps” design as described in Table C-3 in a way that we feel does not consider the treated stand or the treated landscape in its proper context. When a “stand” is first identified in the field by the BLM it usually looks like a solid block. By the time the BLM is finished putting up sale boundary tags the stand usually looks like a piece of swiss cheese. These holes in the stand are due to riparian buffers, survey & manage buffers, unstable slopes, etc. Despite being tagged out of the treatment area, these areas are still part of the “stand.” We would like the BLM to look at these buffers as what they really are: skips in the stand. I walked through the unit in the southeast portion of section 7 of T33SR1W. I couldn’t find a spot to stand in the unit where I did not see boundary tags. This unit is a perfect example of a stand that already has a percentage of its area in skips. There is no need at this point to add more skips. There is only a need to add gaps. The stand in the northwest portion of section 9 of T33SR01W has been cut off 900 feet short of what was

considered in the scoping notice. It appears that about 18 acres from the southern half of the stand have been removed from treatment consideration. That's a huge "skip." How will the BLM account for that skip when designing the prescription for the remaining unit? I had similar discussions in the field with members of the ID Team for the Friese Camp EA where stands similar to this one had additional skips added on top of the already established skips. If the BLM chooses to implement an alternative that aims to create complexity at the stand level and landscape level, we would like to see treatments that reflect the entire stand and the entire landscape.

In the context of our concerns outlined in the previous paragraph, language such as that on page 149 of the EA that states "where survey and manage species do occur, sites will be buffered and protected. These buffer patches will provide for additional structural diversity within stands" seems counterproductive to meeting the diversity needs at a stand level. It is troublesome in that we believe that such buffers should be inclusive to the skip & gap design rather than exclusive. But it is also troublesome in the fact that the BLM believes that buffers will inherently provide "additional structural diversity." This scenario is only accurate if corresponding gaps were implemented for every additional skip/buffer. If a particular stand has received an even distribution of skips and gaps, wouldn't additional skips retard the stand level diversity rather than enhance it? The idea that any treatment area deferred by the BLM is inherently a benefit is not only out of line with the purpose and need of the project but also out of line with the whole concept of increasing stand and landscape complexity. Many of such buffers that I have viewed with the BLM on past projects were unfortunately located in portions of the stands that would benefit **most** from a heavy thinning! An example is a dominant pine tree that is being crowded out by smaller Douglas-fir and white fir that is in need of release. However, a survey and manage plant or fungus species found on or near that tree requires a buffer around the pine instead of a release. We would like to see the BLM consider the possibility that every acre skipped does not necessarily represent an increase in structural diversity, and every acre with a gap does not necessarily represent a decrease in structural diversity.

Table 3-13 on page 83 of the EA is confusing to us. It indicates that 121 acres of thinned stands in late-seral forest conditions will no longer be considered late-seral following the thinning treatments. We do not understand how thinning under the prescriptions in this project could alter the seral stage of a stand. The treatment in these stands is either density management or restoration thinning, depending on the alternative. Both treatments focus on generally thinning from below and maintaining all spotted owl habitat. So how will the seral stage be altered?

During past projects analyzed by the Medford BLM District, AFRC has requested certain information to be included in the EA's. One such piece is the rationale behind why certain stands have been deferred from treatment. We appreciate the Butte Falls Resource Area including this requested information in Appendix J of the Trail Creek EA. It is helpful for us to see this information compiled and is nice to know that the BLM is in fact considering treatment on the entire landscape. We hope to see this included in future projects as well.

AFRC is glad to see that the BLM is being proactive in treating portions of riparian reserves. It has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has no effect 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 and large in stream wood, which is what provides the real benefit to wildlife and stream health. Page 28 of the EA describes that a 20" DBH limit would be implemented in riparian reserves. AFRC is unclear as to why such a limitation is being placed on riparian reserves and what objective it is meant to serve. We cannot find any explanation of the intent of this restriction disclosed in the EA, including Appendix F which discusses the ACS in detail. If the overarching goal of riparian reserve treatments is to restore the function of the reserves, then why is a limitation being placed on these treatments that does not appear in the "restoration thinning" treatments? The outer portions of the reserves that are being treated are essentially the same as the uplands in species composition, so why are the restorative sideboards different? If removing a 21" tree is what the stand needs then why restrict it? Similar to the age limitation mentioned earlier, we oppose any arbitrary limit imposed on BLM O&C lands.

We would also like the BLM to consider including some of the following pieces of scientific research into their analysis. Much controversy surrounding any type of thinning in riparian reserves has surfaced, and we think the following information would be useful in justifying the kinds of beneficial treatments the BLM implements.

(1) Small Functional Wood

Nearly all wood that falls into stream channels has the capacity to influence habitat and aquatic communities (Dolloff and Warren, 2003). Therefore, smaller woody material that enters stream channels is important to overall channel function because it can store sediment and organic material, contribute nutrients, and provide temporary pool habitat and slow-water refugia. It is important to note, however, that pools formed by smaller wood generally are not as deep or complex as those formed by large wood. In addition, small wood does not persist for long periods of time because it deteriorates quickly and is more likely to be flushed from the system (Naiman *et al.*, 2002, Keim *et al.*, 2002).

(2)

In smaller streams adjacent to previously harvested stands, field surveys (McEnroe, 2010) indicated that relatively large amounts of existing (in-stream) and potential (standing) small functional wood are present. Field surveys also indicate that the vast majority of the down wood in these areas originated from within 50 feet of the stream channel. This is consistent with findings by Minor (1997), who found that in second-growth coniferous riparian forests, 70-84 percent of the total in-stream wood was recruited from within 15 meters (49 feet) of the channel. In addition, McDade *et al.* (1990) and Welty *et al.* (2002) found that 80 percent and 90 percent, respectively, of the wood loading occurred within 20 meters (66 feet) of the stream channel in coniferous forests.

McDade, M. H. Swanson, F. J.; McKee, W. A.; Franklin, J. F.; Van Sickle, J. 1990. **Source distances for coarse woody debris entering small streams in western Oregon and Washington.** Canadian Journal of Forest Research 20: 326-330.

Dolloff, C.A., and M.L. Warren, Jr. 2003. Fish Relationships with Wood in Small Streams. Pages 179-194 in S. V. Gregory, K. L. Boyer, and A. M. Gurnell, Editors. The Ecology and Management of Wood in World Rivers. American Fisheries Society, Symposium 37, Bethesda, Maryland.

Minor, K. P. 1997. Estimating large woody debris recruitment from adjacent riparian areas. Master's thesis, Oregon State University

Welty, J. W., T. Beechie, K. Sullivan, D. M. Hyink, R. E. Bilby, C. Andrus, and G. Pess. 2002. Riparian Aquatic Interaction Simulator (RAIS): a model of riparian forest dynamics for the generation of large woody debris and shade. Forest Ecology and Management 162:299-318

Keim, R.F., A.E. Skaugset, and D.S. Bateman. 2002. Physical aquatic habitat II, pools and cover affected by large woody debris in three western Oregon streams. North American Journal of Fisheries Management 22:151-164

AFRC would like to see all timber sales be economically viable. Our membership depends on sawlog volume to keep their mills running and employees working. In addition to volume, AFRC also believes in the importance of the value of these timber sales. It's the value of these sales that will generate income to the counties. Supporting local mills and generating funds to support local government should be a primary goal for all timber sales on federal lands that return receipts to the counties, and we would like the BLM to recognize this goal and keep it in mind while laying out the timber sales that this EA generates. Appropriate harvesting systems should be used to achieve an economically viable sale in order to meet this objective. 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.

We are unclear as to why the BLM is limiting cable corridor width to 12 feet for this project. In past timber sales, such as those off the Friese Camp project, 15 feet was used as the upper limit to cable corridor roads. AFRC does not think that cable corridors should be excessively wide, but we do not support the adoption of a limit as low as 12

feet. There are various circumstances involved with logging operations that will warrant different sized cable roads, and we would like the BLM to support those circumstances by avoiding the use of such a low limit.

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. These two values are intangible and hard to quantify as dollar figures in a graph or table, but they are important factors to consider. The ability to yard and haul timber in the winter months will often make the difference between a sale selling and not, and we encourage the BLM to continue to look for ways to accommodate this. We appreciate the language on page 4 of the EA that provides some of the flexibility needed to allow an operator the ability to mitigate the potential resource damage associated with wet weather operations. We also appreciate the language on page 73 that clarifies the tolerance that the BLM will have regarding sedimentation and its actual effects to the resources. We encourage the Butte Falls Resource area to continue to use this type of language in their EA's and to implement it on the ground. The result will show itself as an increased \$/MBF received at the bidding table.

Constructing forest roads is essential if active management is desired, and we are glad to see that the BLM is proposing the roads that are needed to access and treat as much as the project area as possible in an economically feasible way. Proper road design and layout should pose little to no negative impacts on water quality or slope stability. We are glad to see the Butte Falls RA recognize that all roads are not inherently detrimental to aquatic habitat on page 69 of the EA. We also understand the 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 and keeping existing ones. Removing culverts, waterbarring, and closing a rocked road to vehicular traffic is a relatively inexpensive practice that would leave the roadbed intact for future use. We encourage the BLM to carefully consider the future management needs and added costs of fully decommissioning roads throughout their landscape. AFRC believes that constructing a road today, then obliterating it, and then rebuilding that same road in 20 years is a waste of time and money.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision making process for the Trail Creek EA. 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