AMERICAN FOREST RESOURCE COUNCIL

April 29, 2013

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

In Reply To: Trail Creek Scoping

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 has voiced our concern over the long-term sustainability of the timber supply on BLM managed O&C lands and how the current management culture is affecting this supply. The difficulty that the BLM has had implementing any treatment that successfully regenerates a stand of mature timber has resulted in an unbalanced age-class distribution across the Forest, particularly on the Matrix allocation, and has left a void in stands in the 0-20 year age class. This void concerns AFRC and raises the question of where future timber products off the BLM will come from. 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. We believe that if the BLM plans to be in the business of selling timber products in perpetuity then it must figure out a way to cut some big trees and grow some little trees. We are glad to see that the Butte Falls Resource Area is proposing some regeneration treatments in alternative 2 to address this issue of sustainable timber management. However, we continue to be confused as to where the direction is coming from that results in the actions proposed for alternatives 3 & 4.

AFRC wants the BLM's RMP to be the driving force behind management decisions and project designs, which is what alternative 2 appears to propose. The scoping notice describes alternative 3 as "emphasizing restoration thinning **as described in the RMP**." Appendix E of your RMP describes specific silvicultural prescriptions and recommends how they should be implemented on both the north GFMA and south GFMA regions. Restoration thinning, a type of forest condition restoration treatment, is described in this appendix as one tool in the tool box. On the very next page, under direction for north GFMA, the RMP discusses resource condition objectives where it states that "it is expected that forest condition restoration treatments would occur primarily in the southern GFMA." Alternatives 3 & 4 of the Trail Creek scoping notice propose use of restoration thinning across the entire project area, both north & south GFMAs. So the emphasis of restoration thinning on this project is not "as described in the RMP" at all. It is in fact inconsistent with the RMP. The north GFMA prescription goes on to describe that if Forest Condition Restoration treatments are proposed that "priority for treatments will be determined at the stand level." The Trail Creek scoping notice appears to be prescribing treatments at the landscape level, not stand level, which would explain why a single silvicultural treatment is being prescribed for the entire landscape. Out of all of the silvicultural tools described in Appendix E, why did the BLM choose restoration thinning as the sole treatment for 2 of the 3 action alternatives? Where in the Medford RMP is there direction to select this single treatment as the one size fits all solution to meeting all of your objectives?

We hope that the BLM recognizes the inconsistencies between alternatives 3 & 4 described above, and works to implement the alternative that represents their RMP direction. With that said we would like the Trail Creek EA to include a clear purpose and need to support such an alternative. We recommend modifying the objectives listed in the scoping letter to better reflect the O&C Act. "Manage lands for permanent forest production in conformity with the principles of sustained yield" and "To distribute timber receipts to O&C counties" comes right off the O&C Act. While most of the objectives listed in the scoping letter can be achieved with thinning treatments, the two objectives I listed cannot. This reality can be illustrated in an EA by the BLM in order to support an alternative that includes regeneration treatments. The objective to distribute timber receipts to counties clarifies the difference between the BLM breaking even on their timber sales and generating revenue from their timber sales. Harvesting 3MMBF of timber off 400 acres is a lot different than harvesting 3MMBF of timber off 150 acres. The latter treatment will reduce logging costs and give the BLM the ability to provide revenue to the counties and meet the second objective we listed. If this objective is in the EA, then the BLM can illustrate that an alternative that harvests more volume per acre (regeneration treatments) can meet the purpose & need, while a treatment that only thins

and harvests less volume per acre cannot meet the purpose & need. The BLM can also illustrate in an EA how the objective to manage for sustainable supplies of timber can only be met with an alternative that includes regeneration harvests. To further support such treatments we would like the BLM to include in their analysis an age-class breakdown of the Matrix lands in this Resource Area. This could be used to illustrate the imbalance of the forested stands the BLM manages from both a timber perspective and a wildlife perspective, and how this imbalance needs to be remedied in order to meet an objective that mandates sustainable timber management.

AFRC would like the BLM to treat as much of the project area as possible. One reason for this ties into our discussion in the previous paragraph about volume per acre corresponding to higher revenues to support the O&C Act. The other reason is that the BLM may not likely be analyzing this watershed again for quite some time, so any area that is deferred for treatment will likely miss its window for effective management. We viewed much of the project area in the field and noticed several areas not included on the scoping map as preliminary units that represent areas we would like the BLM to consider as treatment units for this project. We would be happy to discuss these areas in detail with the BLM in the near future. We understand the many sideboards the BLM must adhere to, so these areas may likely have valid reasons for treatment deferral. However, we would like to know what and where these sideboards are and how they are affecting your treatment units. These sideboards can also be illustrated in the EA for this project in order to clarify how much land the BLM must defer from treatment to meet the laws and regulations affecting them. Such an illustration would also be beneficial by putting the project into context of the larger landscape. Very often the BLM conducts commercial timber harvests on only a small percentage of the landscape, and we think the public should be aware of just how small of a percentage this can be. We have attached a sample table that can be used to illustrate these points and would like the BLM to consider including it in their EA for this project.

The scoping letter describes the alternatives in regards to northern spotted owl (NSO) habitat. All action alternatives propose to maintain the current owl habitat status, and alternative 2 also proposes to apply management actions only outside known active NSO sites. We would like the EA to be clear on how and why these deferrals were made. It is our understanding from the Owl Estimation Methodology (OEM) that the BLM is guided to maintain certain levels of NRF habitat within the core areas (50%) and home ranges (40%) for occupied sites at the time of listing. Is the NRF habitat in the core areas and home ranges in this project area at, above or below these thresholds? And how is this level of habitat driving the sideboards listed above for alternatives 2 & 3? The OEM also describes that dispersal habitat should be analyzed and maintained on the scale of a 5th-field watershed, yet the scoping document only refers to NSO "sites." Has the BLM analyzed the current dispersal conditions and needs on the Trail Creek Watershed scale, or was this analysis only done on the scale of individual owl sites? We would like to see the proper habitat analysis as described by the OEM in the Trail Creek EA to clarify why no RMP prescribed management actions will occur inside known owl sites for alternative 2, or why alternative 3 will maintain all current owl habitat. AFRC understands the BLM's responsibility to contribute to the recovery of listed species such as the NSO.

However, we would like to see that the BLM is making this contribution based on the procedures recommended by the Fish & Wildlife Service, not based on arbitrary analyses.

We also are aware that much of the project area is in the newly designated NSO critical habitat (CHU). The Fish & Wildlife Service released a final rule on this new habitat designation which recommends "a hands on approach to forest management within critical habitat." The rule goes on to encourage land managers to consider management that balances short-term impacts with long-term benefits. We hope the Butte Falls Resource Area considers this direction when formulating treatments in the CHU. As stated previously in this letter, we notice that many treatments are being designed to "maintain current owl habitat status." We urge the BLM not to use a one size fits all approach where NRF or dispersal habitat elements are maintained at 100% regardless of stand or landscape conditions. In many cases downgrade of NRF or removal of dispersal is a short-term impact with a long-term benefit that the BLM should be considering, and one that the Fish & Wildlife Service recommends.

AFRC is glad to see that the BLM is being proactive in treating 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 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 and large in stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the BLM to focus their riparian reserve treatments on a variety of native habitats. Often the management of these reserves gets focused only on late-seral habitat, so we would like the BLM to keep options open to meet all aspects of the ACS. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that the ACS mandates should be considered.

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.

Naiman, R.J., E.V. Balian, K. K. Bartz, R. E. Bilby, and J. J. Latterell. 2002. Dead wood dynamics in stream ecosystems. USDA/Forest Service PSW-General Technical Report-181

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. We encourage the BLM to conduct an economic analysis early in their planning process to explore the viability of each stand treatment. 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.

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. 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 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