



June 29, 2011

Steven Lydick  
South River Field Manager  
Bureau of Land Management  
777 NW Garden Valley Rd  
Roseburg, Oregon 97471

**In Reply To:** Roseburg District Secretarial Demonstration Pilot Project

Dear Mr. Lydick:

The American Forest Resource Council (AFRC) is pleased to provide this information to be included in your planning of the proposed Roseburg Pilot Project. AFRC represents over 90 forest product businesses and forest landowners in twelve western states. 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 Roseburg 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 concerned about this project for a number of reasons. Our primary concern is that the management principles being promoted by Drs. Franklin and Johnson are not consistent with the mandates of the O&C Act. The O & C Act imposes several mandatory duties on the BLM which include:

1. "All of the O & C lands classified as timberlands "shall be managed for permanent forest production."
2. The timber on those lands "shall be sold, cut, and removed in conformity with the principals of sustained yield ...."
3. "The annual productive capacity for such lands shall be determined and declared."

The principles of sustained yield dictated by the O&C Act are biologically based and include all lands classified as "timberlands." Drs. Franklin and Johnsons

recommendations for moist site regeneration are inconsistent with these principles of the sustained yield of timber mandated by the O&C Act .

Before the BLM decides what is to be done on the O&C lands they must first identify the lands that are suitable for timber production (timberlands) and calculate what the annual productive capacity is (sustained yield). Any proposed projects on these lands must then be assessed as to whether they would contribute or hinder District's ability to sell of the calculated annual sustained yield.

As stated in the scoping letter, "The Secretary of Interior and the Oregon Congressional Delegation have expressed a strong desire to break the existing gridlock in order to move forward with ecosystem restoration and with economic recovery in southwest Oregon. As such, the Secretarial Demonstration Pilot Projects would serve to illustrate the various principles and tools of restoration to aid in gauging whether or not broader social support for active management can be achieved."

AFRC does not think that by simply illustrating the various principals and tools will "break the existing gridlock". There are many roadblocks that create this gridlock that need to be fixed before the BLM will be able to move forward with the economic recovery in southwest Oregon. The BLM does not need any help treating the 5% of the land base that they are currently treating. They need help fixing the roadblocks that is keeping them from managing the other 95% of their land base. We are very disappointed in the approach that has been taken to evaluate what lands need treatment in this project. The criteria that were used narrows the acres available for treatment to those acres that the BLM already has no problem treating.

Below are the proposed criteria by Norm and Jerry along with the Roseburg BLM to identify the acres to be considered in their Pilot. The results are 2% of the land being considered.

	<u>ACRES</u>
Myrtle Creek Watershed	76,000
BLM administered land	31,000
Age class under 50 yrs (considered too young)	-9,000
Age class between 110 yrs and 160 yrs (highly controversial)	-3,300
Age class over 160 yrs (considered old growth)	-10,000
Dry Site	-4,100
Stands having major access needs, or complex stand structure, or in the home range of a reproducing pair of owls, or QMD <10, or MBF/ac <20	-3,100
Scattered Units	-300
Riparian Reserves	-400
Stands left to select from for this pilot project	= 800 acres

A reasonable estimation could be made that 20% of the 800 acres will need additional protection for sensitive species and sensitive sites.

The scoping letter also indicates that there is a potential to apply density management treatments in a portion of the Riparian Reserves and Riparian Management Areas. We think this is one key issue that needs to be addressed in this pilot. There is plenty of research out there that concludes thinning these dense plantations in the riparian areas is beneficial. The BLM is currently thinning inside these areas to promote stand health, vigor, and to grow larger trees faster. Not thinning these areas of the project would give a false picture of what the overall treatments would look like.

AFRC would like to see an EA alternative that maximizes the number of acres treated, uses the most economical harvest systems, maximizes the volume per acre removed within the limitations of Drs. Johnson and Franklin principles, has the minimum number of operating restrictions, and does not exclude the removal of large trees or the construction of new roads which are needed to meet the restoration objectives of Drs. Johnson and Franklin's.

AFRC would like to see the following issues and concerns addressed in the EA.

- What are the current land allocations in the project area? What are their stated intentions for management and how does this project meet these?
- The EA should include a detailed economic analysis, displaying the difference in alternatives.
- What are the potential negative effects of not treating the remaining land inside the analysis area? (Eg. The acres become overstocked, poor health, susceptible to disease and fire, create no income for the counties....)
- What decision making process occurred that reduced the size of the project from 31,000 acres within the watershed to the proposed 250-350 acres of treatment?
- 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.
- We would like to see explanations of what the BLM plans to do with the Matrix stands that are older than 110 years and older than 160 years.
- We ask that the BLM display a projection of what these criteria would allow to be treated across the Roseburg District.
- 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.
- Appropriate and locally available harvesting systems should be used when designing the project.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision making process for the Roseburg Pilot Project. 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](mailto:btenbusch@amforest.org).

Sincerely,

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American Forest Resource Council  
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