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Roseburg District BLM
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Paul Ausbeck,

Please consider these comments from Cascadia Wildlands and Klamath Siskiyou Wildlands Center when developing alternatives for the Roseburg District Secretarial Demonstration Pilot Project Environmental Assessment.

In summary: The Purpose and Need for this project needs to be better defined. The EA should include a no-action alternative that continues the successful BLM direction of thinning timber sales. Action alternatives for providing early-seral structure should include creating gaps by killing small groups of trees with fire. Natural regeneration should be used instead of artificial reforestation. Monitoring should be fully described in the EA.

1. Purpose and Need

The purpose and need for the pilot project needs to be better defined. The BLM scoping notice tells us this pilot project is needed to:

“...demonstrate the application of principles of restoration forestry developed by Drs. Jerry F. Franklin and K. Norman Johnson.”

The “restoration” to be accomplished by this project is defined as:

“...activities that are designed to restore forests and landscapes to conditions that are both more resistant and resilient to disturbances and that provide the diversity *needed* to restore and sustain native biodiversity and essential ecosystem functions.”

The EA should clearly identify what diversity is needed to restore in a regeneration harvest that is not present in adjoining private-land clearcuts. The Scoping Notice “need” must match the restoration definition of Franklin and Johnson, which requires restoration to be “needed to restore and sustain native biodiversity”. The Purpose and Need statement in the EA must be very clear on what native wildlife needs this restoration. Monitoring must also be clearly focused on how the early-seral wildlife species being provided for responds to this project.

Large decayed trees and snags provides for songbirds and cavity nesting species. But what else, other than species that use snags, is needed, that only the pilot project would provide for? The EA should detail which species will benefit from the brush habitat that

is being produced, if those species are rare or declining, and for how long this project will provide the brush they need. The EA should describe which specific brush species is necessary to provide for the wildlife in need.

If the BLM determines that early-seral species need more large snags and down wood, the EA should clearly document how many song birds and cavity nesters are being provided for with snags, and how different this is from other BLM alternatives, such as thinning projects with gaps, or in unsalvaged post-fire events.

Because this is a “restoration” project of early-seral habitat, the BLM should provide for 100% of the woodpecker and cavity nesting population, not just 40%.

The legacy component of large, soft pieces of down wood, left over from the first logging is also protected in the usual BLM thinning projects, so that component should not be considered a benefit over other alternatives included in the EA. The EA should enumerate what legacy components are needed, as well as the wildlife species that needs them, that is not currently being provided for in either a no-action alternative, in a thinning alternative, or on adjoining industrial clearcuts, and why these components are important to develop now in section 17.

Snags are the component most missing from the landscape (industrial clearcuts provide for plenty of brush after herbicides wear off). Therefore, the pilot project EA must fully describe how the snag component will be restored (or retained), and in what quantity, *compared to a natural event*. In other words, the EA should disclose what is the natural dead wood component in the coast range after a natural stand-replacing event, including how many snags per acre. The BLM should compare this natural event with what will be left in this project, so we at least know how close we are coming to providing the missing early-seral habitat. The EA should describe how many existing snags will be protected, how many will be created intentionally, estimate unintentional snag creation, and how many snags will result in the future from the retained green trees, and how far in the future. It seems that if the BLM is going to restore this early-seral component, the biggest trees that would otherwise be cut and put on a log truck, should be retained instead to create snag habitat.

Other “restoration” factors the EA should consider: The “restoration” need for this project is defined as “... activities that are designed to restore forests and landscapes to conditions that... provide the diversity *needed* to restore and sustain native biodiversity and essential ecosystem functions.”

When meeting this need, the EA should consider if the older units proposed for the pilot project are our next-best old growth needed to sustain healthy populations of late-seral species, especially now that barred owl is competing for space with the spotted owl. There are thousands of acres of plantations in the adjoining Late Successional Reserve that are younger than some of the stands, and will not reach NSO nesting habitat as quickly as this stand will if it is left. Therefore, the EA should consider if these matrix stands are also important to the recovery of the spotted owl.

2. Alternatives

The No-Action alternative should consider what would happen if no commercial logging occurred in stands up to 100 years old. Some of the units could be native, never before logged stands only a few decades away from providing high quality spotted owl habitat. Considering the NSO is in deep trouble now, the no-action alternative should consider the benefits to the owl from doing nothing in older stands.

A no-action alternative would still meet the “need” for restoration, because the definition of restoration the BLM is using fits with spotted owl needs. The “economic and social” purposes can still be met by BLM continuing to almost meet your timber targets through thinning, for the 20 years of needed thinning remaining.

The no-action alternative should include how much spotted owl (or late-seral) habitat exists within the watershed, not just on BLM land, but the complete watershed. The BLM has stated they will take a watershed-landscape view of this pilot project, and one of those views should be the amount of old growth forests remaining.

The no-action alternative should consider deferring the regeneration harvests until sufficient spotted owl habitat has been restored in the LSR.

The no-action alternative should also consider the impacts of the Western Oregon Plan Revisions (WOPR) on the old growth or LSR in the watershed. That plan, which the Roseburg BLM hopes to operate under this year, could log even more spotted owl habitat in the watershed. It could even turn reserves, such as riparian reserves and late successional reserves, into timber management areas. The no-action alternative must consider this reasonable foreseeable action when evaluating if there will be enough older forests in the area for endangered species.

The no-action alternative should also consider what projects the BLM will not do, because they are busy doing this one. In the last 5 or 6 years, the Roseburg BLM has been focusing on doing needed thinning in managed plantations, instead of regeneration harvests. There has been widespread consensus that this is the right path for the BLM – to get caught up on all the needed plantation thinning before more plantations are created.

The BLM should not take their eye off of that ball and stop or delay the pace of needed projects because there is pressure to regenerate bigger trees. The BLM has been able to provide about 75% of their timber targets doing plantation thinning's. There is no additional obligation to get more timber to the mills.

We have been told that the reason for beginning regeneration harvests again is because the plantations that need to be thinned are running out. Are they? I thought there was 20 years left. **The no-action alternative should give some data on the claim plantations are “running out”.**

The EA's action alternatives should include various type of thinning treatments that the BLM has employed in the past to help restore diversity in younger forests. Thinning could be employed to provide the early-seral habitat the BLM claims is needed, such as heavy thinning and gaps, even gaps created with fire to help provide high-quality dead-tree habitat.

If the EA finds that snags is the most needed early-seral structure, an alternative could create gaps within the stand, concentrated around the largest trees that would not otherwise be retained. The large trees in the gaps center could then be killed with fire. The Forest Service employs this technique when restoring snag habitat. The BLM should also consider this as an action alternative if BLM finds early-seral structure is needed.

The EA should measure how different alternatives will best provide for specific wildlife species needing more early-seral habitat. If the BLM considers, for example, that more dead wood needs to be provided, the amount of dead wood left in the regeneration harvest should be compared with the amount of dead wood created in a BLM thinning project, not just the amount of dead wood left in an industrial clearcut. This will allow the BLM to evaluate how much additional early-seral habitat is being provided by regeneration vs. thinning young stands on BLM lands.

The current requirement for BLM regeneration in matrix is to retain up to 8 of the larger trees per acre, outside of Riparian Reserves. BLM often retained more than that. The EA should explain how many more retention trees would be left outside of Riparian Reserves. Since the current proposal is to plant 200 nursery stock trees per acre, the EA should be clear on if there is a significant difference between this regeneration harvest and a normal, NWFP regeneration harvest, especially different from a connectivity/diversity regeneration harvest that can be provided for in near-by sections. What is not immediately obvious, that the EA should explain, is what's the point of calling this a "Pilot Project" if there is little unique about the regeneration harvest alternative.

3. Reforestation

The EA should fully describe the reforestation plans for this project. While reforestation is not a usual component of timber sale EAs, it is an important issue within this pilot project because there appears to be a conflict in what was recommended in the pilot project proposals (natural regeneration), and what the BLM now wants to do (plant 200 trees per acre, as disclosed on the public field trip).

Reforestation issues should even be considered in alternatives, with one alternative planting 200 trees per acre, as suggested at the field trip, and another alternative considering regeneration primarily by natural regeneration, as the wet-forest pilot project was originally designed.

Drs. Jerry Franklin and Norm Johnson are very clear that the wet-forest pilot project must use primarily natural regeneration. They say:

“Elements of a silvicultural prescription for regeneration harvests in Moist Forests to provide diverse early successional habitat and regeneration of shade-intolerant tree species ... Regeneration of trees will be primarily by natural regeneration.”¹

This is the original recommendation for the Wet Forest Pilot Project, as presented at our December meeting in Washington DC to Ken Salazar. It was the basis for the Secretary to approve the pilot projects. Natural regeneration is critical to the entire purpose of early-seral restoration. It should remain a part of this project, or at the least, as an alternative considered in the EA. If not, the BLM must give a good reason for virtually eliminating this important concept.

Artificially restocking the units at 200 TPA (with mostly Douglas fir?) will diminish the amount of time brush species dominate the unit. It is the brush species that Franklin and Johnson WANT to have on the landscape. They criticize the quality of early-seral habitat on private timberland because replanting eliminates native brush species quickly. In contrast, the pilot project’s entire purpose is to retain this high-quality, early-seral wildlife habitat.

This pilot project is supposed to be different from industrial forest early-seral habitat. Planting 200 TPA instead of 400 TPA is not very different, especially since this project will leave scattered retention trees that will also contribute to reforestation. Planting 200 TPA, plus natural regeneration, will produce a dense tree plantation that will quickly shade out brush species and result in a project similar to traditional regeneration harvests, not different. Planting 200 TPAs is like a bait-and-switch trick. We were told we want brush for early-seral species, and then we are given just another fiber farm with artificial reforestation, using nursery stock seedlings.

The purpose of this project is:

“Implementing regeneration harvests in Matrix forests using principles of ecological forestry to help provide a regular flow of structurally-complex, **early** successional habitat (as well as other **early** stages of forest development). These actions could help provide ecologically important habitats that have become increasingly rare...”²

Using scattered seed trees and natural regeneration is an uncommon silvicultural practice now, but it is what we are supposed to be doing again. Planting 200 trees per acre turns that purpose around to one of a simple, business as usual, tree farm, bringing us down the familiar path of pre-commercial thinning, and then commercial thinning – all on a grid – just like our usual tree-farms. Instead, nuts and berries and butterflies and moths are what we are supposed to want, not a tree farm managed on a grid.

Jerry Franklin and Norm Johnson recommended, “Regeneration of trees will be primarily by natural regeneration.”³, which means some limited replanting could occur. This should

¹ Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon. Dr. Jerry Franklin and Dr. Norman Johnson. November 30, 2010. Page 8.

² Restoration of Federal Forests in the Pacific Northwest: Strategies and Management Implications”. Dr. K. Norman Johnson. Dr. Jerry Franklin. August 15, 2009. Page 6

³ Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon. Dr. Jerry Franklin and Dr. Norman Johnson. November 30, 2010. Page 8. Posted on the Coos Bay BLM Pilot Project web site.

occur where specific species are under-represented on the landscape where they once were more abundant, such as Sugar Pine. Disease resistant Sugar Pine could be reintroduced by replanting.

Other than planting under-represented species, the EA should consider no artificial reforestation. For *early seral with structure* creation to be successful, there should be no opening so large that retained trees cannot reseed it. The early-seral habitat created should be retained on the landscape for as long as possible, not bypassed as quickly as possible with the use of re-planting.

“Ecological forestry encompasses forest practices (silvicultural activities) that are based on principles of natural stand development...”⁴. Johnson and Franklin state that where the objective is ecological forestry, such as this Pilot Project, reforestation by tree planting may be appropriate “to establish tree seed sources for specific species and locations but this should not be done using traditional approaches, which are designed to create uniformly stocked forest stands over large areas, even at low densities. Planting, if done, should create irregular patterns and variable densities to duplicate the spatial heterogeneity that is characteristic of natural regeneration.”

“Regeneration would be considered in the context of the goal of nurturing the development of structurally-complex, early-successional communities. The need for artificial reforestation would be carefully evaluated. This evaluation would consider such issues as the availability of surviving seed trees...”⁵

“In designing regeneration harvest systems ecological forestry principles also call for recognizing and nurturing the diverse early successional communities that can develop following harvest and natural disturbances (Swanson, et al.submitted). This objective may result in different approaches to tree regeneration as well as the specifics of the retention harvest prescription, such as more reliance on natural regeneration and acceptance of competition from trees and shrubs.”⁶

The EA must include at least one alternative that follows the recommendations of Franklin and Johnson for restoration of early-seral communities – natural regeneration.

4. Monitoring

Monitoring is a critical component of this project. If the BLM claims that specific early-seral wildlife species will be enhanced, monitoring must be in place to verify those claims. Monitoring must consider the watershed landscape when measuring habitat for the target species, and if it is being provided for instead on industrial land clearcuts. Monitoring must track species abundance within the project unit to see if the project is adequately providing habitat for the list of target species.

⁴ Restoration of Federal Forests in the Pacific Northwest: Strategies and Management Implications”. Drs. Norman Johnson, Jerry Franklin. August 15, 2009. Page 71.

⁵ Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon. Page 70.

⁶ Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon. Page 23.

For a pilot project designed to be replicated over thousands of public land acres, on lands that are our next-best-old growth, monitoring is important to make sure the creation of early-seral habitat is doing what it is supposed to do. Desired outcomes need to be clearly defined, and a monitoring protocol described. It is also important to describe how monitoring will be funded and implemented over what period of time.

Monitoring should also track the impacts to wildlife that is dependent on mature forests, and how the habitat those species depend on could be degraded or postponed by this project. In addition to listed endangered species, species like bats could be impacted because old growth forests provide higher quality roost sites than younger forests. A 100-year-old non-plantation, diverse forest provides higher quality roost sites than younger forests.

7. Forest Carbon and global warming.

The EA must consider the impacts on carbon from this project, including estimating the tons of carbon lost to the atmosphere through the loss of overstory trees, and including the fossil fuels used to harvest those trees and manage the plantation that results from that harvest.

The BLM has been considering carbon in timber sale EAs for the last 2 years, but the BLM has only done this in thinning projects. This will be the first regeneration harvest measured for carbon loss. In thinning units, the BLM has measured the loss of carbon through harvest, and the gain in carbon through increased tree growth of retained trees, up to the next planned harvest, a time frame of at least 40 years. For regeneration harvest, EA should find much less carbon gain because far fewer trees will be retained to have an increased growth.

Also, the BLM must not do the usual measurement of carbon sequestration in seedling growth (as figured in Appendix C of the WOPR and elsewhere) because primarily natural regeneration will be used, whereas BLM's usual calculations are based on dense replanting, primarily Douglas fir, with hundreds of trees per acre. Reforestation is supposed to be very different in this project, and future projects based on this pilot. Therefore, carbon sequestration calculation must be different.

The purpose of this project is to enhance brush species, and keep that brush on the landscape for as long as possible. The EA should show that, compared to overstory trees, brush sequesters and stores very little carbon.

When considering carbon impacts of fossil fuels, don't forget to include the petroleum products used:

- * in logging equipment, hauling lumber to mills, and in milling wood products;
- * by loggers and inspectors commuting to the project area in vehicles;
- * by BLM to get to the project area to prepare the sale, do the wildlife surveys, marking stand boundaries, etc.

*in fertilizers and herbicides, including road-side herbicides used in preparation for logging equipment use, and the equipment used to apply chemicals.

When considering the carbon impacts of using fossil fuels for this project, consider the EPA's web site⁷ for calculations of carbon emissions. If the BLM has different conclusions than the EPA on the carbon emissions from fossil fuels, the EA should explain why the EPA has different figures.

The EA should be very clear on what is being measured and the time frame for the measurement. Since this is a pilot project, it is even more important for correct, peer reviewed measurements to be used, as it could be the basis for thousands of acres of regeneration harvests to follow.

For a regeneration harvest in a mature stand, the data will show that the BLM will lose a large amount of carbon to the atmosphere, that could be lost forever because of BLM's plans to continually harvest this stand through regeneration harvests on a rotational basis. If current regulations continue (WOPR), the BLM would practice short-rotation forestry on this stand. Since the stand will never again store as much carbon as it does today, the EA should consider not harvesting it in the no-action alternative due to carbon loss. We are facing imminent danger of global warming, now. It is important for at least *public* forests to not add to that problem, a problem that threatens global destruction like no other problem we have ever faced. If the BLM concludes that we will simply gain back lost carbon in 100 years, the BLM must consider that 100 years from now is too late. We must reduce our carbon impacts now, and no later than in 10 years, not 100 years.

8. Riparian Reserves: ACS and hardwoods

The public was told the pilot project would be in matrix land allocations only. However, the Roseburg Pilot Project scoping notice tells us that the riparian reserves will now be included in this project.

The EA should include an alternative that eliminates riparian reserve commercial logging, and returns to the original design of a matrix-only pilot project. Including reserves complicates the purpose and need for the project. Riparian Reserves were not included in Drs. Franklin and Johnson's proposal for the pilot projects.

In any alternative that continues to consider riparian reserve logging, the EA must show that the proposed reserve logging is "needed" to meet Aquatic Conservation Strategy (ACS) objectives. The Northwest Forest Plan says:

"Apply silvicultural practices for Riparian Reserves to control stocking, reestablish and manage stands, and acquire desired vegetation characteristics *needed* to attain Aquatic Conservation Strategy objectives."⁸

The EA must document which of the riparian reserves would attain desired vegetation

⁷ <http://www.epa.gov/cleanenergy/energy-resources/calculator.html#results>

⁸ Northwest Forest Plan C-32.

characteristics on their own or with a non-commercial treatment. Commercial treatments could not be needed everywhere, as some of the reserves could meet ACS objectives on their own. Just because it would take a little longer does not mean thinning is *needed* to get there. Thinning in Riparian Reserves must be needed because the thinning itself will degrade the forest by lowering snag and down wood recruitment rates, suffer new roads, new yarding corridors and other disturbances.

Thinning and road building in Riparian Reserves will capture mortality, reduce recruitment of pool-forming wood, and could retard attainment of ACS objectives. For instance, ACS objective #8 could be retarded because it requires that coarse wood be maintained and restored which requires maintenance of the pool of live trees from which future recruitment of large wood can occur and maintenance of natural mortality processes continue to operate over time.

The EA should include an alternative that fully protects hardwoods trees in their natural forming clumps. Hardwoods should not be single stemmed without a good reason.

Density management must include non-grid spacing. Trees growing within 2' at the base, should be retained or taken as one tree to help preserve any existing, non-grid, unique spacing. Species diversity should also be restored to historic conditions by retaining most minor species, especially in stands that were replanted exclusively in Douglas fir.

9. Jobs

A big part of the Pilot Project purpose and need is about providing local jobs. Therefore EA should consider all the cumulative aspects of the local economy. Making a statement like xyz mmbf provides xyz jobs is a shallow analysis.

The “jobs” economic analysis should compare the amount of jobs provided by regeneration harvest vs. the usual BLM thinning sales.

The EA should consider the export market’s influence on jobs. The Pacific Northwest Research Station announced May 21 that for the first quarter of 2011, West Coast softwood timber exports were up 50.5 percent from the first quarter of 2010. Log exports from Oregon and Washington totaled 379.5 million board feet. Logs and lumber went primarily to China and Japan as well as to Taiwan, Indonesia and South Korea, exporting mill jobs with them.

On the other hand, the Bureau of Land Management exceeded its volume of trees offered for sale in Oregon and California in 2010. According to agency data, the BLM was congressionally financed to offer 184 million board feet of wood, and it offered for sale 192 million board feet.⁹ Specifically, Coos Bay BLM is averaging over 150% of its 27 mmbf annual timber target.

⁹ <http://www.eugeneweekly.com/2011/06/09/news.html#2>

The EA should consider if logs from a BLM regeneration harvest could ever make a dent in the jobs lost to the log export market. Because logs from BLM lands cannot be exported, for every raw log that is exported, the BLM would have to produce two logs to make up for the mill jobs lost and to increase local jobs. If the export market has grown 50%, how many more logs can the BLM realistically produce to grow local jobs.

If this pilot project is tied to local jobs while local jobs are being lost through the export market, the export market is relevant to this project and must be considered in the EA.

This concludes our scoping comments on the Roseburg Pilot Project. We hope to see our comments reflected in the EA.

Sincerely

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