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July 15, 2011

Bureau of Land Management
Roseburg District Office, attention: Paul Ausbeck
777 NW Garden Valley Blvd
Roseburg, OR 97471
Email: OR100MB@BLM.GOV

RE: Scoping Comment-- Roseburg Secretarial Demonstration Pilot Project

Dear Paul:

This letter is submitted in response to the Bureau of Land Management request for scoping comments on the Roseburg Secretarial Demonstration Pilot Project (Pilot).

I am writing on behalf of Associated Oregon Loggers, Inc. (AOL), which represents nearly 1,000 logging and allied forest member companies. These companies play a major role in management of private & public forests throughout Oregon— as contractors, purchasers and vendors of forest management services. Although they are generally contractors of forestry services, AOL members occasionally purchase BLM timber sales. AOL member companies depend on a reliable timber supply, including federal forests, and we encourage federal plans and regulations that promote active management of federal forests in Oregon—especially the restoration of unhealthy forests. As such, AOL represents substantial expertise in forest management. AOL members are directly impacted by decisions made as a result of BLM forest projects, such as the proposed Roseburg Pilot.

We appreciate the opportunity to comment, and are writing to urge you to design and implement a Project that tests the most challenging aspects of the NW Forest Plan--1995

Roseburg District *Record of Decision and Resource Management Plan* (ROD/RMP). Although the stated Proposed Action intends to achieve some very minor gains in prescriptive practices, we disagree that the Proposed Action would accomplish either the stated Purpose and Need or make any meaningful progress toward overcoming the confounding layers of procedural obstacles—such as the RMP Aquatic Conservation Strategy, Survey & Manage, prohibitive & inflexible RMP Standards and Guidelines, the n. spotted owl recovery planning, or the retarded and autocratic consultation with USFWS and NMFS.

We urge you to revise the Proposed Action as soon as possible—while considering the following concerns we have about the Pilot:

Riparian prescriptions. The Pilot should test riparian prescriptions that conduct *more tree removal* than the default NW Forest Plan BLM RMP Aquatic Conservation Strategy.

Road construction. The Pilot should test road construction that conducts *more road building* than the default NW Forest Plan BLM RMP Standards & Guidelines.

Mature tree harvest. The Pilot should test harvesting of large & mature stands that conduct *increased harvest of old trees* than the default NW Forest Plan BLM RMP Standards & Guidelines.

Regeneration harvest methods. The Pilot should test harvest regeneration methods that conduct *fewer leave trees* than the default NW Forest Plan BLM RMP Standards & Guidelines.

Regeneration establishment. The Pilot should test use of herbicides for site preparation and release of seedling regeneration that conduct *expanded use of herbicides* than the default NW Forest Plan BLM RMP Standards & Guidelines.

‘Survey & Manage’ protocols. The Pilot should test expedited/streamlined methods that conduct *quicker and more efficient species surveys* than the default NW Forest Plan BLM RMP Standards & Guidelines, and subsequent ‘Survey & manage’ administrative protocols.

Consultation streamline. The Pilot should test USFWS and NMFS Section 7 consultation that conduct *expedited consultation procedures* than the default NW Forest Plan BLM RMP Standards & Guidelines.

Isolated and difficult acreage to manage. The Pilot should test treatment of the isolated tracts/slivers/or difficult-to-manage parcels that conduct *fewer harvest of “difficult acreage”* than the default NW Forest Plan BLM RMP Standards & Guidelines.

Economic sustainability. The Pilot should test more economical harvest methods that conduct *greater revenue generation* than the default NW Forest Plan BLM RMP Standards & Guidelines.

Interdisciplinary team. The Pilot should test a more balanced composition of staff on the interdisciplinary team that includes an *assigned operational, economic representative on the ID Team*, rather than the default BLM RMP project planning process that fails to include an ID Team member designated to specifically represent economic and operational feasibility.

Thank you for the opportunity to comment about the Roseburg Secretarial Demonstration Pilot Project (Pilot). If our comments create questions, please do not hesitate to contact me: 503-364-1330, or by email: rexstorm@oregonloggers.org

Sincerely,

/s/ Rex D. Storm

Rex Storm, CF

Forest Policy Manager, Associated Oregon Loggers, Inc.



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