Data Submitted (UTC 11): 10/3/2025 7:00:00 AM
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Comments: LETTER TEXT:
To Whom it May Concern:The American Forest Resource Council (AFRC) and Associated Oregon Loggers (AOL) submit the following comments on the Blue Mountains Forests Plan Revision Draft Land Management Plan.AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West.AOL is a local trade association that represents nearly 1,000 family-owned forest contracting businesses. Our member companies have been involved in the management of Oregon[rsquo]s forests for decades and provide the capacity necessary to get work accomplished on all forestlands in the state. These nearly 23,000 owners, operators and employees are essential to conduct activities in the woods. Our vision is to foster success for Oregon[rsquo]s forest operators and ensure they are respected and celebrated for the indispensable role they play in keeping our communities, forests, and economy healthy and vibrant.Many of our collective members have their headquarters, offices, or other operations in communities adjacent to the Blue Mountains National Forests, 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[rsquo]s forest sector employs approximately 61,000 Oregonians, with AFRC[rsquo]s and AOL[rsquo]s memberships directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this Revision, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.Our comments are focused on the components of the Preliminary Draft LMP, specifically the Desired Conditions (DC), Standards, Guidelines, and Objectives that will dictate forest management over the life of the Plan.Forest Structural StagesThe Draft LMP includes DCs (described in terms of acreage) for multiple forest structural stages ranging from early seral to late seral. We support using structural stages, as defined by Historical Range of Variability (HRV), to guide DCs. Management guided by the need to have a balance of forest age classes and structural stages should provide for a range of habitat needs as well as a sustainable supply of timber products.However, we are confused why the Forest Service has determined the need to establish a Guideline that focuses only on a single structural stage: late seral. FW-FOR-OLD-GDL-01 establishes restrictions on harvesting trees based on arbitrary diameter limits and arbitrary age limits across all lands in the Plan area. This Guideline appears to be included to ensure that the DC for the two [ldquo]old forest[rdquo] stages of HRV is attained. It is unclear why the Forest Service has not developed similar Guidelines to ensure that the other three structural stages of the HRV are attained.Insertion of FW-FOR-OLD-GDL-01 is even more puzzling given how problematic and unproductive the current Standards in the Eastside Screens have been for the past 30 years. The Forest Service has routinely pursued project-specific Plan Amendments to relieve themselves from the arbitrary [ldquo]21-inch rule[rdquo] in order to meet forest health objectives. It is well- documented1 that the selection of 21-inches was not based on scientific or empirical evidence, but rather a [ldquo]negotiation[rdquo] between special interest groups and the Forest Service in the 1990s.As such, it is no surprise that Forest Service experts have repeatedly determined its application to1 Powell, C. David. Eastside Screens Chronology. White Paper F14-SO-WP-SILV-53. USDA Forest Service, Pacific Northwest Region, Umatilla National Forest. 2013. Available at: Eastside Screens Chronologybe counterproductive to attaining desired end results in practice.We strongly urge the Forest Service to remove FW-FOR-OLD-GDL-01 entirely. Its inclusion is not based on science but instead based on the belief that Forest Service employees cannot be trusted to manage for a single forest structural stage identified in the DCs for HRV without shackling them to arbitrary restrictions.To support the removal of this Guideline we urge the Forest Service to consider and incorporate in the ensuing Environmental Impact Statement (EIS) the following collection of scientific studies.Johnston, J. D., C. J. Dunn, M. J. Vernon, J. D. Bailey, B. A. Morrissette, and K. E. Morici.

2018. Restoring historical forest conditions in a diverse inland Pacific Northwest landscape. Ecosphere 9(8):e02400.10.1002/ecs2.2400Findings[bull] Research indicates a 60.2% increase in density in ponderosa pine dominated stands and a 176% increase in density in grand fir stands over the past 140 years. These findings suggest that if restoration of historical conditions is a goal of managers, then treatments in moister mixed conifer stands should be a priority.[bull] The results of this study indicate that restoring historical conditions will require removal of a significant portion of contemporary stand basal area, especially in moister and more productive stands.[bull] Retaining all trees >53 cm (21[rdquo]) dbh may handicap restoration of historical forest conditions for two reasons: First, many stands, particularly moister and more productive stands, currently have more trees >53 cm (21[rdquo]) dbh than were historically present. Second, many trees >53 cm (21[rdquo]) in contemporary stands are a different species than was present historically and retaining these trees will exacerbate compositional shifts from shade-intolerant to shade-tolerant species.[bull] Achieving compositional targets (i.e., restoring stands to the historical proportion of different species) is likely to be more important to achieving resiliency objectives than structural targets (i.e., restoring stands to historical basal area or density).[bull] Reducing forest density to historical levels while maintaining a higher proportion of shade-tolerant species than was historically present will likely result in higher stand water use, greater drought stress, and increased risk of mortality from fire and insect disturbance than desired.AssessmentThe findings in this paper support the notion that a firm one-size-fits-all guideline to attainingdesired end results across a broad spectrum of forest types is flawed. It also supports the notion that such a guideline will likely undermine the diverse mix of species present across these forest types. One-size-fits-all guideline issues will also be exacerbated by warming/changing climatic conditions.Merschel, Andrew, Vora, Robin S., and Spies, Tom. 2019. Conserving Dry Old Growth Forest in Central Oregon USA. Journal of Forestry. 117(2):128[ndash]135.Findings[bull] Results suggest there is approximately a 1 in 5 chance of allowing harvest of a tree older than 125 years using the 21-inch rule as a guide. However, the rule limits harvest of large young shade-tolerant trees that have developed following fire exclusion. For large trees, 62 percent of grand fir and 50 percent of Douglas-fir were less than 125 years old. In contrast, only 7 percent of large ponderosa pine were less than 125 years old.[bull] Overall, the 21-inch rule protects large old-growth ponderosa pine, but fails to protect smaller old-growth individuals of all species, and does not allow for removal of large younger shade-tolerant grand fir and Douglas-fir that have developed following fire exclusion.[bull] New guidelines could incorporate how age structure varies with environment and development history, and include morphological indicators of tree age that can easily be applied by managers and technicians.AssessmentThis document further supports the notion that tree dbh is often a poor surrogate for determining tree age. In particular, it highlights the flawed nature of the 21[rdquo] dbh limitation on the effectiveness of protecting old grand fir and Douglas-fir.Stine et al. 2014. The Ecology and Management of Moise Mixed-Conifer Forests in Eastern Oregon and Washington: a Synthesis of the Relevant Biophysical Science and Implications for Future Land Management. USDA General Technical Report PNW-GTR-897.Findings[bull] Strict age or size limits on tree harvest that are not sensitive to site conditions, disturbance history, and topo-edaphic settings can hinder some restoration efforts and may reduce resiliency. Rules of thumb provide helpful guidelines but departures from these may be allowed with well-reasoned explanations.[bull] Tree diameter was used (in the Eastside Screens) as a rapid and conservative but crude surrogate for old growth to limit removal of larger and older trees[mdash]because analyses hadnot been completed to characterize old forests and old trees[mdash]across the variety of forest types and productivities.[bull] Restoration guided by size alone will not remove all of the individuals of species and ages of trees that are products of the altered disturbance regimes of these forests.[bull] The limits on removing any tree larger than about 53 cm (21 in) whatsoever, regardless of geographic context, or age, or species, or relative abundance, or other considerations (e.g., forest health) within a patch can inhibit regeneration in some stands, lack any real landscape objectives, and impede landscape-level management and restoration.AssessmentThis report reemphasizes the same points made in the prior two papers cited regarding the flawed nature of abiding by a one-size-fits-all limitation.Hessburg et al. 2020. The 1994 Eastside Screens[mdash]Large Tree Harvest Limit: Synthesis of Science Relevant to Forest Planning 25 years Later.Findings[bull] A lower-end size limit of 21-inches was negotiated with the plaintiffs included in the NRDC petition.[bull] Recent research has shown, however, that old trees are not always large, and large trees are not always old (Van Pelt 2008, Brown et al. 2019)[bull] Combining age- and size-based metrics to retain adequate densities of large trees along with old trees featuring desirable traits could allow younger large trees to be

managed more flexibly.[bull] The 21[rdquo] rule does not provide protection for older, but smaller trees that may play an important ecological role. Neither does it allow for removal of young but large shade- tolerant trees that are maladapted to the existing fire regime.[bull] Tree diameter alone is an insufficient guide for restoration[bull] Focusing on a single scale (the tree) does not address stand and landscape scale considerations.[bull] Simplistic rules and standards will, over time, generate unintended consequences, making it more rather than less difficult to manage for resilience to climate change and other threats, and to provide for multiple ecosystem services.AssessmentThis synthesis further supports the flawed nature of relying solely on tree diameter as a surrogate for age.Riparian Management AreasWe are pleased with the proposed language in the Draft LMP that permits commercial timber harvest through silvicultural thinning in Riparian Management Areas (RMA). Another flaw of the Eastside Screens is its blanket prohibition to using timber harvest as a tool to improve riparian function and health. Removing this arbitrary constraint will facilitate active forest management, including timber harvest, to reduce forest density and mitigate fire risk, which is equally important in riparian areas as it is in upland areas. Some streams in the Blue Mountains may benefit from heavy conifer removal prescriptions.To bolster the analysis regarding active forest management in Riparian Management Areas in the ensuing EIS, please consider the research study copied below that is relevant to eastern Oregon forests.Messier, Michael S., Shatford, Jeff P.A., and Hibbs, David E. 2011. Fire Exclusion effects on riparian forest dynamics in southwestern Oregon. Forest Ecology and Management. 264 (2012) 60-71.Key points of the Messier paper include:[bull] Fire exclusion has altered the structure, composition, and successional trajectory of riparian forests in fire-prone landscapes.[bull] Fire exclusion has been associated with increase in tree density and recruitment of shade-tolerate species that may replace large diameter, more decay-resistant Douglas-fir trees.[bull] A hands-off management regime for these riparian forests will have ecologically undesirable consequences.While we support the transition to active forest management in RMAs, we do not support the retention of the second site-potential tree height used on fish-bearing streams. The scientific justification for this second tree height in the Blue Mountains is unclear. However, it may be pertinent to refer to similar considerations in western Oregon where the second site potential tree for fish-bearing streams in the northwest forest plan was established in large part to address riparian ecosystem microclimate.Research since then has indicated that impacts to microclimate rarely extend beyond one site potential tree height. Most notably, a 2005 study, and the references cited within it, concluded that changes in microclimate occurs within one tree height (15 to 60 m) of the created edge.22 Moore, R. Dan, D. L. Spittlehouse, and Anthony Story, 2005. Riparian Microclimate and Stream Temperature Response to Forest Harvesting: A Review. Journal of the American Water Resources Association (JAWRA) 41(4):813-834.That study ultimately concluded that [ldquo]based on the available studies, a one-tree-height buffer on each side of a stream should be reasonably effective in reducing harvesting impacts on both riparian microclimate and stream temperature.[rdquo]Given these more recent scientific findings, we believe that the Forest Service should consider dropping the second site potential tree height from riparian management areas on fish bearing streams. It should be noted that the BLM adopted these same modifications (one site potential tree height) for fish bearing streams in their 2016 RMPs in consultation with the National Marine Fisheries Service. The Forest Service should pursue the same modifications in this revision.Timber Land Base and Harvest LevelsThe Draft LMP identifies 2.76 million acres of land that may be suitable for timberproduction. That amounts to about 56% of the total land base. The majority of acres not suitable for timber production are in Wilderness Areas and Inventoried Roadless Areas. The Annual Projected Timber Sale Quantity (PTSQ) (total/sawtimber) from that land base is copied below:Malheur [ndash] 59/55 MMBFUmatilla [ndash] 57/54 MMBFWallowa-Whitman [ndash] 65/62 MMBFWe generally support the number of acres identified as suitable for timber production and the projected PTSQs. However, in general, National Forests across the nation have routinely failed to attain the PTSQs identified in their LMPs. Therefore, we urge the Forest Service to strengthen the Standards and Guidelines related to timber production to ensure that those PTSQs are routinely attained.We also urge the Forest Service to include in the EIS a breakdown of stand structural stages across the suitable land base to help inform management strategies that would align with HRV and the PTSQs.Landscape Patterns and ConnectivityThe DCs and Guidelines associated with [ldquo]connectivity[rdquo] are unclear and unnecessary. If the Forest Service effectively manages consistent with the HRV guidelines, there is no need to [ldquo]connect[rdquo] any habitat types. Under this scenario, the forest will consist of an appropriate range of forest structural stages capable of supporting the full suite of wildlife and vegetation.In particular, FW-CON-GDL-02 has the potential to be an

obstacle to effectively attaining HRVas well as objectives specific to acres treated and PTSQ levels. That Guideline states the following: To provide dispersal opportunities and reduce risk of population-level fragmentation, when conducting vegetation treatments, connected areas should be retained for species dependent on structurally complex forest.How will the Forest Service define and identify [ldquo]connected areas?[rdquo] This term is written so vaguely it could be interpreted to include most, or all, of the National Forest System lands governed by the Plan.Ultimately, like the Guidelines pertaining to diameter limits, these connectivity Guidelines are unnecessary if HRV is effectively attained. In fact, these Guidelines will only serve to complicate management, reduce the ability of the Forest Service to meet its other objectives, and provide a vulnerability to those stakeholders who oppose any level of active forest management. We strongly urge the Forest Service to remove the Landscape Patterns and Connectivity section entirely to allow the attainment of HRV unhindered.Wildland FireIt is concerning that the hazardous fuel mitigation treatment objectives under FW-WF-OBJ-01 include [ldquo]natural fire[rdquo] as a treatment type among prescribed fire, mechanical fuel, and silviculture. Natural fire and managed wildfire are not planned treatments and counting them towards your planned treatment objective is not only risky, but not appropriate. Although natural fire can have a mix of effects on the ground and can result in some positive or beneficial conditions when light fire behavior occurs, it should not be a goal during fire season. These benefits are tangential to the objective of putting the fire out during fire season. FW-WF-OBJ-01 and FW-WF-STD-01 seem to be counter to one another. It is alarming that although firefighter and public safety are the [ldquo]highest priority[rdquo] during a fire incident, the Forest Service also thinks it is appropriate to utilize those natural fires to achieve annual acreage target objectives for hazardous fuel mitigation. The only objective during an incident for an Incident Management Team or Complex Incident Management Team should be to put the fire out, not treat acres.Forest operators and firefighters risk their lives daily on fires. That risk should be on mission and clear in its objective. Please use forest operators outside of fire season to create resilient landscapes and provide economic vitality throughout your local communities through forest operations, silvicultural practices, and timber sale.We would like the Forest Service to remove [ldquo]natural fire[rdquo] as a viable pathway to achievehazardous fuel mitigation treatment annual acreage objectives.We would also like the Forest Service to remove FW-WF-MAPR-01 which allows for managedwildland fire for resource benefit. This should not be a management approach.ElkWe recommend that the Forest Service consider the needs of large ungulates, particularly elk, and incorporate relevant scientific research into the LMPs Standards and Guidelines pertinent to those species. Specifically, we urge you to consider a 2023 General Technical Report that focused on elk needs in northern Idaho.3This study made the following conclusions:[bull] Early seral communities in western forests are critical for satisfying ungulate nutritional requirements.[bull] Elk populations would benefit far more from creating and sustaining more early-seral communities than from creating more areas of dense forest cover.[bull] The greater the removal of overstory, the greater the response of undergrowth, much of which is shade-intolerant, relatively palatable plant species.[bull] Much research has been conducted suggesting the importance of [ldquo]cover[rdquo] provided by forests mainly for protection from harsh weather (thermal cover) and as areas for elk to hide from predators and human activities (security cover). The relevance of thermal cover was directly addressed in a variety of studies two decades ago for elk and other ungulates, all of which reported virtually no evidence that thermal cover provided the assumed bioenergetic benefits (i.e., protection from harsh weather). Providing security cover as a refugia for elk is intended to maintain desired population distributions of elk on public or other lands; however, this objective can be more efficiently met through integrated landscape management of adequate nutrition, strategic road closures to facilitate elk use of areas of adequate nutrition, and provision of cover.We also urge the Forest Service to consider the findings of the Starkey Experiment Station,which includes the world[rsquo]s largest ungulate research enclosure.4Forest Products StandardsFW-FORPROD-STD-06 limits even-aged regeneration harvest openings to 40 acres. As already emphasized, we don[rsquo]t support arbitrary limitations of most kinds, including on timber harvest opening size. It is unclear whether this acreage limitation is based on science or simply adopted3 Monzingo, Deborah S.; et al. 2023. A field guide to summer and early autumn forage resources for elk in northern Idaho. Gen. Tech. Rep. PNW-GTR-1016. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 88 p. https://doi.org/10.2737/PNW-GTR-10164 https://research.fs.usda.gov/pnw/projects/starkeyproject#researchfrom past LMPs. Forests across the west routinely seek regional forester approval to exceed the 40-acre opening limitation. Forest Service experts should

be permitted to determine the appropriate size for openings, free of constraining LMP Standards.FW-FORPROD-STD-07 limits even-aged regeneration harvest to [ldquo]where it has been determined to be the method most appropriate to achieve desired conditions for vegetation, wildlife habitat, scenery, and other resources.[rdquo] Determination of even-aged vs uneven-aged systems should be primarily a function of site-specific forest ecology, not on [ldquo]desired[rdquo] wildlife habitat or scenery. Some shade-intolerant tree species, such as Douglas-fir, are not suited for uneven-aged systems as they require full sunlight to thrive. Other tree species, such as some pine, can thrive in partial shade and could be successful in an uneven-aged system. These specific needs should be the primary factor considered by forest silviculturists when determining the most appropriate method to reestablish early seral forests.Soil Standards and GuidelinesFW-SOIL-STF-03 maintains that BMPs and Project Design Criteria may be added to individual projects above and beyond what is included in the LMP [ldquo]as necessary to maintain soil productivity.[rdquo] We recommend that the Forest Service remove this standard as standard 01 and 02 along with the identified desired conditions for soil (FW-SOIL-DC) provide a necessary base for managers and operators to achieve the required protections sought by the Forest Service. If these conditions are clearly articulated in project analysis as the floor and operators understand these to be the objective, then adding additional BMPs or Project Design Criteria should not be necessary and could actually hamstring the Forest Service[rsquo]s ability to allow purchasers and operators to sit at the bidding table. Oberly restrictive or prescriptive BMPs and Project Design Criteria that add restrictions are less helpful and useful than clearly articulating the end results sought.Additionally, FW-SOIL-GDL-01 provides arbitrary language that complicates the possible use of tethered logging equipment. The language, [ldquo]Exceptions to this may include equipment designed for steep slopes that are determined appropriate to maintain soil function[rdquo], especially that which is italicized, is problematic. Is the Forest Service determining the appropriateness to maintain soil function? Is the manufacturer required to certify the ability of the machine to maintain soil function? Although we appreciate the idea of creating flexibility with this Guideline for the possible use of tethered equipment, we are afraid that it will not be equitably or standardly applied across of the units within the LMP footprint. We would prefer a slope limitation not be included in the LMP and instead, simply identify the end results needed allowing operators and purchasers to use the mechanisms available to them to achieve your goals. We would like the Forest Service to utilize recognized scientific literature and pilotproject findings from the Wallowa-Whitman NF and Umatilla NF to highlight the appropriateness of this method. Preliminary results from the ash caped soil sites on the Wallowa-Whitman and Umatilla have shown little to no compaction and erosion even after anappreciable amount of rain following operations utilizing tethered ground based equipment. This research thesis will be forthcoming by Parker Turk, graduate student in Dr. Woodam Chung[rsquo]s lab at Oregon State University. However, previous research from Dr. Woodam Chung[rsquo]s lab about tethered logging on ash caped soils was completed in Austin Finster[rsquo]s thesis and can be found below.Finster, Austin R. 2021. Tires, Tracks, and Tethering: Idaho Steep Slope Harvesting. [Unpublished Master of Science in Sustainable Forest Management]. Oregon State University.
https://ir.library.oregonstate.edu/concern/graduate_thesis_or_dissertations/nv935b158?locale=zh&Key points of the Finster thesis include:[bull] Soil impact from ground based equipment on flatter landscapes remain consistent when placed onto steep slopes when utilizing a tethered system.[bull] Although there are impacts from any mechanized harvest operation to soil, none in the study were found to reach or evet a point of detriment.[bull] Ash caped soils are appropriate for tethered ground based machines.With little to no yarder sides in Eastern Oregon available for work on steep slopes in the Blue Mountains Ecoregion, we implore you to remove barriers to use tethered ground based equipment and ensure there is standard understanding across the LMP area to allow its use rather than creating ambiguous standards and guidelines in the LMP for each forest and soil scientist to interpret or add to based on their own risk tolerance. The scientific literature is sound5. Tethered logging is not only a viable harvest method for operational and economic effectiveness6, but also beneficial to worker health7,8, supportive of higher wages, and protective of soils9.5 Holzfeind, T., et al. (2020). Development and benefits of winch-assist harvesting. Current Forestry Reports, 6(3), 201[ndash]209. https://doi.org/10.1007/s40725-020-00121-86 Green, P. Q., et al. (2019). Insight into the productivity, cost and soil impacts of cable-assisted Harvester-forwarder thinning in western Oregon. Forest Science, 66(1), 82[ndash]96. https://doi.org/10.1093/forsci/fxz0497 Garland, J., et al. (2019). Safety in steep slope logging operations. Journal of Agromedicine, 24(2), 138[ndash]145. https://doi.org/10.1080/1059924x.2019.15811158

Pokharel, M., et al. (2023). Assessment of timber faller working conditions in mixed hand and tethered-machine cut harvest units on steep slopes- a case study in Western Oregon. International Journal of Forest Engineering, 34(3), 408[ndash]416. https://doi.org/10.1080/14942119.2023.21701499 Sessions, J., et al. (2017). Theoretical stability and traction of steep slope tethered Feller-Bunchers. Forest Science, 63(2), 192[ndash]200. https://doi.org/10.5849/forsci.16-069ConclusionThank you for the opportunity to comment on the Draft LMP. We urge the planning team to consider our input as you finalize the LMP and develop the EIS.Sincerely,Andy GeisslerFederal Timber Program DirectorAmerican Forest Resource CouncilAmanda Sullivan-AstorForest Policy ManagerAssociated Oregon Loggers