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Comments:
April 5, 2016
Blue Mountain National Forest Revision
Malheur, Umatilla, Wallowa Whitman National Forest
Baker City, Oregon 97814

Re: Blue Mountain Forest plan Revision,

Dear Ayn Shlisky:

Thank you for the opportunity to provide comments to the Blue Mountain Restoration Strategy Team to revitalize the health of the Dry Fir and Ponderosa Pine Forest of Northeast Oregon. All the land bases should be included in this EIS study. This includes Eagle Creek and the expanded Snow Basin EIS area.

I am providing comments to USFS Region Six to the Blue Mountain Restoration Strategy Team as a Private Forestry Consultant, practicing professional-level forest management since 1975, with experience on both private and federal agency forestland. Approximately thirty-one of these years have been in the geographic area of Malheur, Umatilla, and Wallowa Whitman National Forests. My landowner clients share multiple miles of common boundaries with the federal land management agency's in the Blue Mountains of Northeast Oregon.

It is human to error, but it is even more human to blame someone else. In the USFS presentation last week in Baker City Oregon, the FS blamed the current poor forest health on private landowners. I could not more strongly disagree with that FS statement. My landowner client in Rancheria Creek had me conduct a commercial thinning in 2002. I was preparing an additional follow up thinning for the fall of 2015 when the Cornet Fire burned up my landowner's property line, and within a few yards the wildfire came out of the crown and burn through her property as a ground fire. Out of 69 log trucks hauled in January 2016, twenty were fire killed and forty nine were green tree thinning.

My landowner client in East eagle had me conduct a commercial thinning in 2007 and 2014. The Eagle Creek fire burned up to her property line and went out at fire line her neighbor had constructed with a D-5 cat.

In both cases, I marked trees from below and included for cutting trees both below and above 21 inch DBH. The main criteria for being retained for future growth was that the leave tree be disease free, both of bark beetle and mistletoe. Not whether it was above or below 21 inch DBH, and it has a good full crown ratio. I used Keens Tree Classification guidelines.

I strongly recommend that the USFS do likewise and no longer use the Eastside Screens Rules, period.

The single greatest concern that my clients and I have is that even after we conduct an appropriate level of cutting, to promote sustainable forestry, under stand improvement guidelines and meeting sanitation criteria, the effort is made useless by forest disease or wildfire encroaching from adjacent National Forest lands.

The greatest single different I can point to that separates the private forest landowners from the National Forest resource managers is the adoption of the east side screens. Although the intent of the USFS Region Six was

admirable when it adopted the east side screens, the screens have become a booby trap and tripwire to pragmatic common sense forestry operations. This includes a lack of timely fire salvage and sanitation cutes to remove fire mortality and diseased trees.

This timely salvage would provide a great number of positive economic activities to saw mills, logging contractors, and county governments.

Since the adoption of the east side screens by Region Six, the wildfires in the Blue Mountain National Forest have NOT become more manageable or less intense, but instead these wildfires seem to have gotten hotter and burn MORE acreage. The denuding of the forest cover has made the watersheds very vulnerable to rain or snow fast flooding and summer cloudburst that severely alter and destroy the fisheries and clean water we have come to expect from intact forest canopies. The seriousness of stand destroying wildfires, to a great extent, has been exasperated by the 21 inch and above no cut rule and excessively wide streamside buffers. These east side screen rules need to be modified to allow pragmatic and common sense forest restoration activities to occur for forest health reasons.

While I manage my clients forest to the highest stewardship standards, my success as a non-industrial forest consultant ultimately depends on how well my forestry efforts are complimented by public federal forest efforts. Both private and federal resource managers need to work together at this goal of restoring the health of the Blue Mountain Forest ecosystem.

Attached is a list of a number of points concerning deficiency in the Blue Mountain Forest Plan.

For all the reasons mentioned, I strongly recommend dropping the current Blue Mountain Forest Plan Revision and starting over.

Sincerely,
Arvid E. Andersen
Andersen Forestry Consulting

My list of concerns with the Blue Mountain Forest Plan Revision

- 1) It appears the USFS Region Six does not give full credit to the economic activity resulting from commercial timber harvest operation. The economic activity causes dollars to be recycled many times in the local communities conducting tree harvest and wood product manufacture.
- 2) Currently the USFS Region Six does not take adequate action to protect old growth stands. The practice of carrying too high of basal area or stems per acres causes old growth stands to be at a high risk of insect attack and danger stand destroying wildfires. Some trees above 21 inch DBH have to be harvested to protect the remaining old growth trees.
- 3) Too much land is being considered to be and to wilderness system. Adding forest land to the wilderness system condemns that land to stand destroying wildfires. Adequate land base is now in wilderness designated areas.
- 4) The east side screens have buffs that are too wide and are areas where excessive fuel loads have built up. Numerous intense wildfires have occurred here in the RMZ on NF lands. This destroys the very RMZ resources that need to be protected, degrading the forest ecosystem. The Oregon Forest Practice Act provides excellent protection of the RMZ and should be adopted in the BMFPR.
- 5) Drop any mention of Global Warming or Climate Change. Mankind use of fossil fuels and poor forest health has not distinctively been tied together by scientific study and only serves as an excuse for no action. Proving forest management practice can be used to restore forest health.