August 20, 2015

RMPs for Western Oregon
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97208

To the BLM:

On behalf of the Oregon Society of American Foresters (OSAF), I wish to submit to the BLM some comments on the current RMP DEIS for Western Oregon. For background about our perspective, the OSAF has nearly 1,000 members and is the largest state affiliate of the national Society of American Foresters (SAF). The SAF supports and represents the forestry profession in advancing the science, education, technology, and practice of forestry. OSAF members work throughout the state in a variety of organizations, including local, state and federal agencies, higher education, as well as the private sector.

Many OSAF members are directly involved with planning and administering forest management activities on both public and private lands in Western Oregon, and thus they are primary stakeholders in the current process to update the RMP. However, I must emphasize that OSAF provides an independent, professional perspective rather the views of our members’ employers, public or private.

Although OSAF has not taken a formal poll or position on the RMP DEIS, these comments provide a professional perspective that is expected to be generally consistent with the views of the broader OSAF membership. The comments are based on review of the DEIS by a group of OSAF members who have substantial expertise and experience in Oregon forestry. In addition, our comments draw from concepts and views expressed in a number of our current position statements on major forestry issues in Oregon (available at www.forestry.org/oregon/policy/position/ and noted at the end of the comments that follow), which have been strongly endorsed by our members.

Our detailed comments follow, but we would also like to highlight here a few key points about planning for BLM and other federal forest management in Oregon:

- Broad-scale, extended-term plans such as the RMP should focus on clarifying management goals and objectives and avoid overly prescriptive directives that provide little or no flexibility for forestry professionals to deal effectively with locally unique and dynamic forest characteristics. Highly precautionary and restrictive directives and land allocations (e.g., “no-touch” reserves) do not consistently produce desirable environmental results and do not effectively address changing resource and environmental (e.g., climate) conditions. Conversely, active management led by experienced professionals can help improve and maintain favorable forest conditions and related benefits, including key ecological functions and habitat for early-, mid-seral and mature forest species.

- A significant increase in active management of federal forest lands can substantially improve forest resource and community health, diversity and sustainability. Active management, including outputs of commercial forest products, represents an opportunity rather than a threat to achieving and maintaining forest health and ecological diversity. Forest products are arguably among the greenest of the natural resources needed to sustain society. From the basis of both existing federal law and a visionary approach to meeting future human needs, federal forest lands have a key role in providing a significant source of these products. With relatively few exceptions, management that includes outputs of commercial forest products is highly compatible with the maintenance or enhancement of environmental values.

Thank you for your attention to this input. If you have any questions, or if OSAF can provide any assistance to the BLM regarding this important management planning activity, please do not hesitate to contact us.

Sincerely yours,

Paul W. Adams, Ph.D.
Oregon SAF Policy and Legislation Committee Chair
OREGON SOCIETY OF AMERICAN FORESTERS

Comments on BLM RMP draft (DEIS) for Western Oregon

• As a general principle, Oregon SAF supports legislation, policies and plans that allow and promote active management of most of the O&C land base by knowledgeable and experienced forestry professionals. Included in such management is, very importantly, vegetation management such as tree harvesting for both ecological and economic benefits. We believe that active management is critical to the development of forests that are resilient in the face of climate change, wildfire, insect/disease infestation and other perturbations. Given broad goals, the expertise and experience of local forestry professionals can be used to make informed management decisions to effectively meet those goals. In addition, directives for “no-touch” reserves and other broad and inflexible restrictions are not supported by current science and management experience.

• We believe that, to the greatest extent possible, management plans need to clearly define broad goals and then allow local resource managers to use their professional expertise and experience to meet these goals. We believe in the integrity and abilities of agency resource specialists and specialists and that, given clear goals, they can plan and oversee effective actions to meet multiple and diverse forest resource goals. Consequently, we disagree with RMP directives that are overly prescriptive, unnecessarily limit the use of expertise and experience of local resource specialists, and do not adequately address site-specific conditions.

• We are disappointed that, given the high productivity of most O&C lands, the DEIS does not include a full range of alternatives to pointedly meet the stated purpose and need as directed by the O&C Act. We understand that the Northern Spotted Owl (NSO) recovery plan calls for large blocks and protection of other older, complex stands, but we believe that there is now sufficient research to support at least one active management strategy that would concurrently address both timber and wildlife goals. To date, there has not been a thorough analysis of alternatives for achieving this integrated objective by the BLM, Forest Service, or the Fish and Wildlife Service. The agencies apparently have accepted the NSO Recovery Plan as the only way to meet the goals without providing any analysis of possible alternatives. We are aware that specialists with the BLM and Forest Service made note of possible alternatives while the Recovery Plan was being developed, however this input was not integrated by the FWS or the Department of the Interior. We believe that, at a minimum, an alternative that substantially expands the harvest land base while requiring some longer stand rotations to meet non-timber resource goals for wildlife and other resources should be included.

• We are encouraged that the RMP action alternatives reduce the multitude of land use allocations and special management areas required in the Northwest Forest Plan (e.g., AMAs, Key Watersheds). A complex land use allocation platform is cumbersome and costly for management, lacks flexibility to deal effectively with changing environmental and resource conditions, and over the past two decades has produced few apparent benefits.

• We are encouraged that, unlike the Northwest Forest Plan (NWFP), the action alternatives presented do not call for preparation of new, mid-level analysis documents (e.g., Watershed Analyses, Late Successional Reserve (LSR) Assessments), nor for provincial/regional review of such mid-level analyses. These reviews seldom added substantial value to forest resource management and were an undue burden to the agencies trying to implement the NWFP.
• The Survey and Manage (S&M) requirements were a particularly onerous component of the NWFP. They impeded active management much more than originally expected and the related impacts were much greater than predicted in the original NWFP NEPA analysis. In many respects it was redundant with, and much more restrictive than, the BLM’s Special Status Species (SSS) program. It was very expensive to implement, prescribed strict survey methodology and protection measures, and gave very little control to local resource specialists and managers. In addition, S&M seemed to be particularly susceptible to litigation that impeded active management. All four RMP alternatives would remove the S&M requirements and return BLM to its broad-based SSS program. We believe this is a positive change.

• All of the RMP action alternatives would reduce riparian reserve widths as compared with the default NWFP requirements, which reflect highly conservative widths for non-aquatic wildlife habitat and other functions. It is important to note that under the NWFP the default widths can be modified following further resource analysis, yet the defaults continue to be often used because the modification process can be onerous, including public perceptions that the defaults are invariably necessary. Both research and experience have shown that most or all resource benefits can be achieved with riparian buffers that are significantly narrower than the NWFP default widths. Thus, given the economic focus of O&C forest management, such narrower buffers can leave more acreage in the timber production land base while facilitating larger and wider harvest units that are more operable and economically viable. Allowing some carefully planned management actions within most riparian buffers also can provide the flexibility needed to deal effectively with both undesirable (e.g., high wildfire hazards) and desirable (e.g., increased woody debris) resource conditions in riparian areas due to climate change and other influences. In contrast, the RMP action alternative that prohibits removal of commercial timber from riparian reserves would, with no supporting evidence, unnecessarily restrict and make more costly management to achieve diverse resource goals.

• The RMP action alternatives include a range of regeneration harvest intensities from clearcutting with no significant tree retention to variable retention harvest. Oregon SAF believes that a wide range of regeneration harvest prescriptions including clearcutting should be available to managers so as to best match the management goals with prescriptions to meet site-specific conditions. We are concerned that available prescriptions may be strictly limited by geographic area, e.g., northern versus southern ecoregions. In general, a particular harvest prescription will fit stands in a particular region, but not always. BLM should look for ways to give resource managers some flexibility and not absolutely constrain them with “hard lines” drawn on plan maps. Alternatively, sufficiently broad prescriptions should be available to provide management flexibility within the harvest land base sub-allocations (HITA, MITA, etc.). Without this flexibility, foresters may be forced to prescribe treatments that do not fit the site, which is contrary to the science and practice of silviculture and may lead to undesired consequences.

• Post-fire (or other stand replacing event) salvage harvest in LSRs is restricted and even prohibited in some of the RMP alternatives. Particularly following a severe wildfire, an LSR is unlikely to retain its unique habitat features and functions. Thus, there should be management flexibility that allows both salvage harvest in LSRs as well as reallocation of lands to provide mature forest habitat, the latter similar to the natural historical shifts in forest conditions over the landscape. Salvage harvest prescriptions can and should include provisions for retaining and protecting important habitat features and watershed functions, while also providing valuable resources to pay for and expedite the rate of restoration.
• With its ownership checkerboard, BLM management can greatly affect adjacent private lands and vice-versa. This is particularly important with respect to fuels and fire management in the dry southern interior forests. Private stands are typically in younger age classes, often even-aged and are easily damaged or killed, even by lighter fires. The BLM should actively treat its forest lands not only to improve resiliency, but also to lessen fire severity, and reduce risk of spread to adjacent private lands. To help clarify and focus these management needs for areas of recent fires and those with the highest risk of future fires, the DEIS should include a thorough analysis of the effects of not treating post-fire fuels on adjoining private forestlands.

• Alternative A allows restoration thinning in LSRs but precludes commercial timber removal in moist forests. There is no credible scientific argument for such a blanket prohibition and thus commercial harvest should only be restricted where such harvest is expected to have a substantial negative effect on meeting management goals. Realistically, BLM will be hard pressed to find funding for such costly activities, as it already struggles to pay for even routine commercial harvest planning. Prohibiting any commercial removal, beyond a site-specific ecological need to retain some standing or down woody material, is a waste of a valuable resource.

• The RMP action alternatives include LSR allocations, ranging from 714,292 to 1,422,933 acres; all reflect increases from the NWFP’s 478,860 acres. However, the expected environmental consequences to the NSO do not seem to vary greatly, which suggests that the BLM has concluded that the barred owl is an overriding factor in NSO recovery. Given these small expected differences in NSO recovery between the RMP alternatives, BLM appears to have a strong argument to adopt the alternative that has the lowest LSR acreage to help achieve its O&C economic mandate. Short of this, the BLM could remove from LSR designation the forest blocks that clearly have with lower biological capacity to support NSOs.

• The greatest risk to NSO habitat is wildfire, particularly in the southern interior forests and with current and projected climate trends. Consequently, the BLM should allow and incentivize management in LSRs to reduce fire risk. This is done most effectively by allowing commercial product removal, and certainly not by requiring “cut-and-leave” treatments as is the case in several of the RMP alternatives. As mentioned earlier for salvage harvests, such treatments can and should include planning to retain and protect some desirable habitat features and watershed functions.

• The prohibition on post-harvest planting in Low Intensity Timber Areas in Alternative A, is dubious. On some sites, brush and grass competition can be so aggressive as to delay regeneration establishment for many decades without planting and maintenance. Additionally, climate change may impact establishment of natural generation. Notwithstanding the desire to prolong stands in early seral stages for several decades, these areas are within the timber base, and thus management should improve the probability of creating stocked stands for later harvest at a rotation age consistent with planning assumptions. Significant delays in restocking the timber base lands are inconsistent with sustained yield management, thereby effectively violating the O&C Act. Delayed reforestation also can drastically increase costs and reduce efficacy of treatments. The BLM was a major cooperator in the Forestry Intensive Research (FIR) program in the 1980s and early 1990s. FIR research remains a cutting edge knowledge base for reforestation on drier sites in western Oregon, and among its important findings was that dry areas require rapid site preparation and reforestation. These findings have been validated by over two decades of experience on BLM and other forest lands.
In several of the RMP alternatives, stand age (e.g., 80, 120, 160) would determine management prohibitions in structurally complex forests. Oregon SAF has consistently opposed the use of inflexible age and diameter thresholds for such restrictions, as they are arbitrary, lack scientific credibility, and are often counterproductive in achieving resource objectives. As stated earlier we maintain that, to the greatest extent possible, management plans should define broad resource goals and then allow local managers to use their expertise and experience to meet these goals. Age and diameters can be used as guidance or general “rules-of-thumb”, but there needs to be flexibility for local managers and resource specialists to make decisions that effectively account for unique and important site-specific conditions. And given the history of protests, appeals and litigation in the region, we are also concerned that stand age will become a point of dispute by groups and individuals that are philosophically opposed to active management and/or economic benefits from public lands.

Alternative B refers to a “District defined map based on existing district specific information” as designating structurally complex forests. Given such mapping, these designations presumably would be subject to fewer disputes, whereas designation by age (Alternatives A, C, D) at time of sale planning could provide a basis for disputes. It is unclear which approach would be easier to implement, but with either approach deference to local resource specialists would be positive. However, varying management by site productivity (Alternative D) seems the most appropriate of the age-defined methods (Alternatives A, C, D) as this approach provides more flexibility for managers to account for important local conditions.

For some alternatives, the DEIS seems to infer that stands of a particular age are on a satisfactory “trajectory”, and thus do not require thinning. We do not necessarily argue that these stands would not eventually reach desired conditions, but the BLM should acknowledge the research and field experience that shows that older forest stands, even those 120 years old, can respond well to thinning and could move these stands to a desired condition quicker. A prohibition of thinning based strictly on age is not supported by science or practical experience.

We acknowledge that entities such as the Pacific Seabird Group establish most Marbled Murrelet (MAMU) survey requirements, rather than the BLM. MAMU surveys represent a considerable cost for the BLM and surveys in marginal habitat (typically younger forests) are a substantial portion of that cost. Alternative C requires surveys only in stands over 120 years in age, which seems to be a logical approach for reducing survey costs.

We are encouraged that, as opposed to creating mileage and other fixed and inflexible restrictions on road construction, this RMP recommends adherence to road construction and maintenance BMPs. We believe that adherence with these BMPs can generally assure that roads will meet management needs without unacceptable environmental effects. The analysis indicates only small differences between alternatives with respect to hydrology impacts due to road construction.

The analysis also shows little difference between alternatives with respect to soils impact. The BLM recommends the use of BMPs to substantially mitigate impacts. We concur with this approach as the BMPs for soil protection are now well-established and have proven effective.
The BLM gives considerable dollar valuation to both carbon storage and recreation. However, there is little difference between alternatives, which is not surprising. As such, in its final decision the BLM should not give undue weight to these values simply due to current general interest in such values.

BLM lands are categorized into Land Tenure Zone 1, 2, 3, with Zone 3 available for disposal. However, BLM continues to acquire lands but seldom disposes. BLM has thousands of acres of land that are difficult if not near impossible to manage because they are isolated and/or are difficult to access. We understand that specific disposals and trades are implementation actions, not plan decisions, but we believe that the BLM should be more aggressive in considering land disposals, perhaps even referring specifically to disposal of isolated and difficult to manage PD lands in the objectives and Direction for the Lands and Realty sections.

In the Riparian Reserve Management Objectives and Direction (MOD) for All Alternatives (AA) the RMP calls for suspension of winter haul when the ground is saturated and monitoring indicates sediment runoff. This directive should be qualified to state more specifically that suspension will occur when there is excessive sediment runoff that significantly impacts water quality, as some limited sediment runoff is virtually unavoidable during winter hauling.

In MOD AA Soils, you require application of BMPs but then give fairly detailed management direction. This direction seems particularly prescriptive and we question if it is necessary or invariably effective, considering the BMP direction.

In MOD AA, Soils you prohibit the use of ground-based machinery for fuels reduction on slopes >35%. The 35% slope restriction is a historical artifact that does not reflect current machine technologies and operating practices. There is now both research and field experience that shows that more advanced equipment and skilled operators can work safely and effectively on steeper slopes. The BLM should update its operating guidelines to reflect these newer technologies and practices that have been proven effective and less costly than cable or other treatments.

In MOD Alternative A, Timber BLM gives a range of decadal regeneration harvest. BLM also differentiates its direction for stands older and younger than 60 years. This seems appropriate but we are concerned that if BLM offers sales in older stands that result in significant protests, appeals or litigation, this will force the agency into disproportionately heavy harvesting in younger stands that have no a lower age limit. This scenario becomes problematic in terms of sustained yield management with diverse resource objectives, and the same problem also can occur in the other action alternatives.

The O&C lands include many sites that are historically and best suited to growing conifer forests but, due to past management or wildfire/wind events, have converted to brush or hardwoods. Given the economic mandates of the O&C Act, these lands should be restored to conifers to facilitate sustained yield management while providing for other ecological values.

Note: The comments above were developed with close consideration of the background, concepts and views discussed in OSAF’s current position statements on major forestry issues in Oregon, which can be seen in their entirety at http://www.forestry.org/oregon/policy/position/ and whose “core” statements are featured on the following pages.
A Professional View of Forest Issues:

Oregon Society of American Foresters Position Statements 2015

Below are “core” positions adopted by OSAF on major forest issues. Further discussion of the issues and other background are included in each complete position statement, which can be seen at: http://www.forestry.org/oregon/policy/position/

Commercial Timber Harvest on Public Lands in Oregon  The Oregon Society of American Foresters supports commercial timber harvest as an appropriate objective and primary tool for promoting healthy, sustainable forests on public lands in Oregon. Most of these lands are affected by laws that allow or mandate sustainable harvest with resource management planning. Where fish and wildlife habitat, water quality, or recreation is a priority, commercial harvest can be compatible and even promote these values when carefully planned and supervised by professional foresters and other resource specialists. Commercial timber harvest provides important economic and social benefits that help sustain local communities, especially in rural areas. These benefits often extend more broadly than government payments in lieu of shared harvest revenues. Management and use of renewable, recyclable, biodegradable, and energy conserving forest products from public lands are imperative given increasing human needs and environmental sustainability concerns. The expanding scope and cost of addressing Oregon’s forest health, wildfire and safety hazards add further urgency to the need for active management and restoration of public lands, including commercial harvest. (Adopted 2012)

Active Management to Achieve and Maintain Healthy Forests  The Oregon SAF supports active forest management prescribed by professional foresters to achieve and maintain healthy public and private forests, consistent with land management objectives. To accomplish this, a wide range of proven forest management strategies and tools must be available to forestry professionals. These include carefully planned uses of forest thinning (sometimes removing trees over a wide range of sizes and ages), approved chemicals (e.g., fertilizers and pesticides), prescribed burning, sanitation and salvage of designated dead and dying trees, regeneration harvesting (e.g., clearcutting, shelterwood, selection) and mixed-species planting. Many federal forests in Oregon now have an especially acute and long-term need for active management that will require diverse strategies and tools, including road access and administrative flexibility to effectively expand and maintain such management. Broad benefits, from wildlife to recreation to forest products, can be achieved and sustained through active management on public and private forestlands. (Adopted 2013)

Thinning on Public Lands in Oregon  We support the use of thinning as a management tool on public lands in forests of all ages because it can effectively: reduce tree stress, improve forest health and vigor, reduce hazardous fuels, create unique forest structures that enhance biodiversity and wildlife and fish habitat, and provide useful products and public revenues. Research and management experience do not support the use of inflexible, arbitrarily prescriptive restrictions on thinning, such as fixed age or diameter limits. With a strong foundation of ecosystem science and ongoing observations of tree competition and other changing conditions, professional foresters and other specialists can prescribe thinning strategies for individual stands that best achieve diverse, long-term objectives within each unique forest type. (Adopted 2014)

Managing Riparian Forests  The Oregon SAF (OSAF) believes that active management of riparian areas on public and private forestlands should be a key part of contemporary strategies and policies to maintain and improve water resources and fish and wildlife habitat. Highly cautious decisions have contributed to very limited management and inconsistent results in Oregon, even where some active management is allowed. We are concerned that, lacking management, many of these unique and ever-changing forests now have or will develop conditions that are less than ideal for habitat and water quality, including reduced biodiversity and substantially increased risks of damaging wildfires.

Factors that have limited the management of Oregon’s riparian forests include concerns about potential impacts, policies that typically restrict rather than promote management, and the complexities and costs of management under the existing regulatory constraints. A common perception is that active management of riparian forests will only have negative outcomes for desired resources. However, a growing body of research and management experience shows that carefully prescribed forest practices can have little or no extended impacts while helping maintain or improve resource conditions. In contrast, there is little or no evidence that highly restricted riparian forest management is cost-effective in achieving diverse management objectives and in avoiding unintended consequences such as reduced ecosystem function and wildfire resiliency. OSAF believes that both state and federal policies should reflect these important realities and do more to encourage active management of riparian areas on Oregon’s forestlands. (Adopted 2015)
Managing Mature and Old-Growth Forests  The Oregon SAF recognizes the unique characteristics and values that mature and old-growth forests provide for society. Definitions for old-growth vary and none are exact; however, these forests can include large snags and downed logs, some patchiness/openings, trees of various sizes and ages, and some relatively large, old trees. Not all forest land had or ever will achieve such conditions because of natural disturbance (e.g., wildfire, windstorms). And, as living ecosystems, trees and other vegetation in these forests can change significantly or die, thereby impacting unique habitat and other desirable features and functions.

A common perception is that actively managing old-growth is inappropriate or incompatible with other values, resulting in proposals to designate mature and old-growth forests where management is totally prohibited. However, even where non-timber values are primary, active management of mature and old-growth forests may be necessary to promote and sustain ecological values over time. This is especially true of forests in drier, fire-prone landscapes, including central, eastern and portions of southwestern Oregon. Such management may include prescribed burning, tree thinning (e.g., to keep bigger trees vigorous with drought and climate change, insects or disease), and planting. Treatments may be needed periodically but there can be decades of little or no activity between periods when management is most effective.

A “one-size-fits-all” approach to mature or old-growth forest management does not address the range of unique and dynamic forest conditions in Oregon both now and in the future. Research and management experience show that site-specific plans are most effective in achieving and maintaining desirable forest characteristics. These plans should carefully consider local ecological conditions and objectives, social concerns, and policy constraints of the owners or managers. OSAF supports appropriate management practices, planned by experienced forestry professionals, to help achieve and maintain desired conditions and values of mature and old-growth forests for current and future generations of Oregonians. (Adopted 2010)

Salvage Harvesting on Public Lands  The Oregon SAF supports the well planned, timely, and careful use of salvage harvesting on public forest lands after uncontrollable events have killed or damaged large numbers of trees. Salvage harvesting can mitigate economic losses due to the event, recover useful wood products, reduce fire and safety hazards and create the desired environmental conditions for successful reforestation. Application of current research and well-proven scientific principles by professional foresters and other resource experts can ensure that economically viable salvage harvesting will be conducted with proper consideration of environmental and social concerns. (Adopted 2013)

Landslides on Forest Lands  The Oregon SAF recognizes that landslides on forest lands represent a complex scientific, land management and public policy issue. Although sometimes harmful to people or property, landslides often reflect natural processes that shape our landscape and can have some ecological benefits. Given such complexities, SAF supports: 1) reducing landslide damage through expanded efforts that follow the “shared responsibility” concept mandated by the Oregon Legislature (Senate Bill 12), including measures that address land use planning, hazard warnings, forest practices and other activities; 2) continued efforts by professionals with appropriate expertise and experience to interpret both current science and on-site factors to identify measures that effectively reduce landslides and their impacts; 3) carefully designed monitoring and research to further study landslide occurrence, influences and effects.

The geology, terrain and climate of the Oregon Coast Range and western Cascades create significant natural landslide hazards, and the occurrence of some landslides can be affected by land use practices, including forest management and construction of highways, homes and power lines. However, most landslide hazards exist whether or not such practices occur and the exact location and timing of slides cannot be accurately predicted. Thus, the identification of hazardous areas for people and property, and ways to reduce their proximity to these areas, are important policy considerations. A broad ban on forest management activities on steep slopes would not effectively eliminate existing landslide hazards. (Adopted 2014)

Using Pesticides on Forest Lands  The Oregon SAF supports the careful use of pesticides that are registered for forestry applications. These pesticides are a safe and important tool to protect the health and productivity of forests by controlling competing vegetation, non-native, invasive species and other harmful, unwanted pests. (Adopted 2012)

Clearcutting  The Oregon SAF supports the careful use of clearcutting as a tool for meeting diverse management objectives, including desired conditions for the regeneration and health of important forest types. Many of the forests seen today in western Oregon were established after clearcutting, which demonstrates its effectiveness in regenerating native species such as Douglas-fir. Current laws include many measures that regulate the use of clearcutting on Oregon’s private and public lands. Professional foresters and other specialists draw from a strong foundation of science and experience to further ensure that clearcutting is applied with prudent consideration of environmental, economic, and social concerns. (Adopted 2013)