



Pacific Analytics, LLC

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Western Oregon Plan Revisions
P.O. Box 2965
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Dear BLM,

Thank you for the opportunity to comment on your proposed revisions of the Resource Management Plans of the Western Oregon BLM Districts. The Management Plan and its component parts has not achieved any of the goals it set for itself. It has not maintained a supply of timber and it has not protected the species it was designed to protect. Timber supplies have continued to decline, and have reached an all time low from BLM lands. The population of spotted owls and murrelets continues to decline and habitat has been destroyed by catastrophic mega fires throughout the region. Much of this failure has resulted from the processes laid out in the Plan.

As a scientist with natural resource expertise, I believe a change is necessary to achieve BLM goals for the land they manage.

Too much land is designated as riparian reserves. The effect has been to lock up too much of the landscape from proper management. The underlying basis of riparian buffer zone delineation is the Site Potential Tree height (SPTH). This is a strange concept and was probably first instituted as the "best guess" of how wide a riparian buffer should be. My personal research as a professional entomologist, is that the buffer zones are too wide, and that when all management is removed from the buffer zone, the result is a degradation of the functional components the buffer is designed to protect.

SPTH appears nowhere in forestry or forest science literature prior to 1994. It has never been measured or correlated to riparian conditions and has caused confusion at the USFS and BLM local levels. No one knew how far two SPTH's was, since the concept had not been, nor could it be, measured, therefore big numbers were dreamed up, for political correctness purposes, and lines drawn on the maps. As a result, 85 percent of Federal forest was set aside in "riparian zones". The result has been that most Federal forest in the Pacific Northwest has been dedicated to catastrophic fire, based on an unscientific concept.

The new Plan should contain more information about the historic development and use of the forests. Humans arrived in the Pacific Northwest about 12,000 years ago and actively managed a large portion of the landscape for more than 10,000 years. Evidently they knew something we don't, because when European pioneers arrived here they thought it

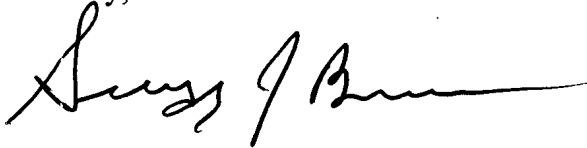
was Paradise. Some effort should be taken to learn how these forests were established and maintained, and discovering modern methods that would mimic those processes practices.

At recent Senate hearings (US Senate Energy & Natural Resources Subcommittee on Public Lands and Forests December 13, 2007), top forests scientists agreed that aggressive active forest management is desperately needed now to remove excess fuels and restore forest ecological functions, in order to prevent further destruction of Oregon's old-growth forests. Note in particular the testimonies of K Norman Johnson - University Distinguished Professor, Oregon State University, and Jerry F. Franklin - Professor of Ecosystems Sciences, College of Forest Resources, University of Washington, and of Michael E. Dubrasich - Executive Director of the Western Institute for the Study of the Environment. The new Plan should address the issues raised in these testimonies and include a mechanism for incorporating their recommendations in the overall Plan.

From an entomological perspective, current forest management is leading to further loss of species diversity. Most of the insect (and plant) species appearing on threatened and endangered lists, or that are "species of concern" or "special interest" are those associated with prairies or oak savanna. Too much Douglas fir has been allowed to invade areas where indigenous people excluded it with methods learned over many millennia. Mostly it was light burning yearly. We need to return to that landscape if we are to preserve the biological diversity. That will require new techniques that apply the lessons learned by indigenous people.

I hope you find these comments useful. I would be happy to elaborate further. Please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory Brenner", with a long horizontal flourish extending to the right.

Gregory Brenner