



OREGON SOCIETY OF AMERICAN FORESTERS

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USDI BUREAU OF LAND MANAGEMENT

Roseburg District Office,
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Attn: Paul Ausbeck,

The Oregon Society of American Foresters (OSAF) is pleased to provide some scoping comments on the Environmental Assessment DOI-BLM-R050-2011-0006-EA regarding the Roseburg Secretarial Demonstration Pilot Project (hereafter referred to as the "Pilot"). We commend the Roseburg BLM staff and others involved with this effort to reduce gridlock, provide a more reliable and sustainable source of wood for local mills, promote community economic stability, and to promote active management of these forests to meet these and other important objectives.

The Oregon State Chapter of the Society of American Foresters (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. Although OSAF has not taken a formal poll or position on the Pilot, 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 the review of a group of OSAF leaders who have substantial expertise and experience in forest management in Oregon.

The OSAF has been actively involved in the Pilot project events, with many members having attended meetings, fieldtrips, and reviewing documents produced by the BLM and by Drs. Norm Johnson and Jerry Franklin.

In developing our comments one thing we found difficult to understand was how this single Pilot project fits into the broader landscape. In short, we believe the goals of the project can only be addressed at that broader landscape level, which now is missing from the project description and discussion. Please keep this in mind as you review and assess our comments.

General Comments on the "Collaborative Forestry" Goals for the Pilot Project

The following goals are taken from the document available on the BLM website about the collaborative forestry approach, which provides some important foundation concepts for the Pilot. As such, our comments consider the connections and consistency between these goals and the Pilot.

Goal 1: Accelerate the development of habitat components across the landscape as needed to support the conservation and recovery of Northern Spotted Owls and Marbled Murrelets.

Comment: The Pilot, as proposed, is an ecologically based harvest-regeneration treatment based on principles promoted by Drs. Johnson and Franklin. In the short run, this treatment will likely reduce some habitat for these species in the area of the Pilot. In the long run, it may increase or promote better habitat. However, we cannot assess this goal unless this Pilot is placed in a landscape context, i.e., knowing how the rest of the watershed will be treated, how much will be treated, where will future treatments occur, and at what pace. Only some sort of landscape analysis and modeling can help answer these questions. The Pilot, in and of itself, will not meet this goal or provide long-term answers for managers.

Goal 2: Reduce the hazard of uncharacteristically large/intense wildfire in dry forests types as needed to support landscape and community fire resilience/resistance.

Comment: This goal appears to be intended mostly for the project in the dry forests in the Applegate area, yet it was included as a goal for the Roseburg Pilot. In the area of the Pilot (~250 acres), the ecologically-based harvest regeneration method proposed by Drs. Johnson and Franklin will likely reduce the threat of stand-replacing wildfire simply because much of the overstory has been removed (eliminating crown-to-crown spread), save for the retention patches/clumps. However, fire resilience is not achieved by one treatment in one area. Fire resilience/resistance needs to be crafted at the landscape level with multiple treatments over time. That is, creating or improving fire resilience is based on a much more complex landscape analysis that includes likely areas of ignition, historic fire and fire patterns, topography, forest types and structure, areas of threatened and endangered species, and proximity to the Wildland Urban Interface. Based on this, it is unclear how the Pilot will achieve this goal.

Goal 3: Provide a reliable and substantial timber volume to support employment, income and public services while recovery planning/critical habitat designation and associated land use planning are addressed.

Comment: The Pilot is intended to showcase a collaborative process that will use restoration principles to provide some timber volume to local mills. It is unclear, after the Pilot is completed, how this will translate into a “reliable and substantial timber volume” to support local communities. To put this into perspective, the Pilot was placed in a younger stand type to avoid unnecessary conflicts about harvesting old trees. The type of stand where the Pilot was relegated to represents only 2-3 percent of the BLM ownership in this watershed and the BLM is already operating in such stands. The Pilot does not address the more wicked management issues related to older stands (80-160 yrs.), old-growth (>160 yrs.), and riparian forests. Again, the Pilot is missing the broader landscape context, including the timber supply goal. However, even a good landscape analysis and plan will not ensure a reliable timber supply when proposed harvests of any kind are a consistent target of lawsuits and administrative appeals. As such, this problem may require a legislative solution to move past the existing sources of gridlock and meet all three goals.

EA Specific Comments

- Statement of “Purpose and Need for Action”

Comments: The purpose and need for action statement is weak and incomplete. The statement should be specific but, as worded, it does not really state why there is a need to implement the Pilot. It seems the three goals mentioned above are the real need for action and thus should be incorporated in the statement.

- The Pilot treatment area avoids the adjacent riparian reserves.

Comments: We do not propose a regeneration-harvest in the riparian reserve area, but this area could be carefully thinned in conjunction with the planned regeneration-harvest. Although avoiding the riparian area limits a source of controversy, there is an important opportunity here to create more complex forests and habitat adjacent to the harvest-regeneration treatment.

- The prescription calls for leaving clumps of one-third to three acres in size over one-third of the Pilot project area.

Comments:

1) We believe that many of these clumps are too small. Fewer but larger clumps, strategically placed within the Pilot, would be more effective as habitat and would likely result in less harvest damage and cost.

2) The amount of acreage taken up by retention clumps is substantial. For example, the Northwest Forest Plan calls for retention clumps of 15 percent whereas the approach here calls for over 30 percent of the acreage in retention clumps. We believe there should be an analysis that considers the stand growth and financial impact this approach has in both the short and long run.

- The regeneration proposed is less intensive than normally prescribed in this area. It would include no site preparation, planting fewer trees per acre (200 trees/acre) than what is typical, and relying on natural regeneration to supplement the planted trees. One purpose of this approach is to create extended early-seral habitat.

Comments:

1) Unlike most other parts of the Pilot treatments, this regeneration approach is based on little or no research or practical experience and has a high risk of greatly delaying successful forest development. In the moist plant association groups (PAGS), competing vegetation is often very aggressive, requiring extra efforts to assure regeneration survival and growth above the competition. In addition, cone crops for natural regeneration are very sporadic, which often results in little or no regeneration as the competition quickly overtakes the site. Once this occurs, even good cone crops that occur later will provide little benefit because the site is fully occupied by other vegetation. This fact is well established by research and silvicultural experience, and is reflected in the reforestation requirements of Oregon's Forest Practices Act.

2) The expected outcome of planting of only 200 trees per acre with no site preparation would be significant reductions in future stand growth and volume. This result would directly contradict the goal of "a reliable and substantial timber volume" (Goal 3).

3) The need specifically for extended early-seral habitat has not been clearly documented. If such a need is justified, a better approach would be to designate some specific areas within the Pilot as

such and not do any site preparation or tree planting in those areas. This approach would avoid regeneration costs and allow these areas to regenerate on their own over a much longer time frame. However, other than these unique areas, site preparation and planting with well-proven methods and experience will ensure successful regeneration and forest development.

4) In addition to providing better justification for areas (i.e., where and how much) with extended early-seral conditions, an economic analysis of the proposed regeneration approach should be conducted and compared with well-established regeneration methods. The alternative approach for extended early-seral habitat proposed here (no site preparation or planting) also should be analyzed to compare its potential impacts on forest growth and timber outputs in providing this habitat.

5) Lastly, both regeneration approaches to provide extended early-seral habitat (the Pilot's and that proposed above) should be evaluated for their consistency with the intent and purpose of the O&C Act as well as their expected compliance with the Oregon Forest Practices Act. Although such compliance is not monitored or enforced on federal lands in Oregon, consistency with state and local laws is expected.

Final Comment: Thinking Beyond the Pilot EA

- It is important to acknowledge the “pinch point” that looms with future timber harvests if the Pilots serve as a model for subsequent treatments, which could preclude the BLM's ability to ever provide a reliable and continuous wood supply and support community stability. The pinch point will result from the cumulative effect of a) leaving areas of old or large trees completely off the table (the extent of which depends on how old trees are defined); b) creating areas of extended earl-seral habitat; and c) creating de-facto no-touch areas in leave patches, riparian reserves and other locations. If old or large trees are off limits as the landscape matures, this takes more and more acres off the table for available timber harvest over time. At the other end of the age spectrum, as areas of extended earl-seral habitat accumulate where trees are absent or are grown at lower stocking and growth levels, this will undoubtedly reduce future timber volumes. Thus, considering the prospect that the principles applied in the Pilot eventually will be applied much more broadly, we believe the BLM should conduct a detailed growth and economic analysis to determine the trajectory towards this “pinch point” and how the intent and purpose of the 1937 O&C Act can be met.

In closing, I want to recognize the following OSAF members for develop and reviewing these comments: Stephen Fitzgerald, Paul Kangas, Norm Michaels, Ann Forest Burns, Paul Adams, and Jim Nielsen.

Thank you for considering these comments.

Sincerely,



Mike Cloughesy, Chair

Oregon Society of American Foresters