From:	Rex Storm
To:	BLM_OR_RMPs_WesternOregon
Subject:	FW: Scoping comment- AOL
Date:	Wednesday, June 27, 2012 5:52:32 PM
Attachments:	image001.png

Dear BLM:
My 6-page comment letter is pasted below, regarding the Western OR BLM RMP Scoping

"Business services for OR forest operators since 1969"
Rex Storm
Forest Policy Manager, Associated Oregon Loggers
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From: Rex Storm
Sent: Wednesday, June 27, 2012 5:48 PM
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June 27, 2012

BLM Oregon Resource Management Plan
P.O. Box 2965
Portland, OR 97208 BLM_OR_RMPS_WesternOregon@blm.gov

RE: Bureau of Land Management, Oregon Resource Management Plan Scoping

Dear Planners:

Thank you for the opportunity to provide comments on the Bureau of Land Management (BLM), Oregon Resource Management Plan Scoping (Scoping), comments to be accepted until July 5, 2012. My comments regard the proposed Resource Management Plan Revision (RMP), which would provide new direction for future management of the 2.6 million acres of BLM forestlands in western Oregon.

Please accept these comments on behalf of Associated Oregon Loggers (AOL), representing nearly 1,000 member logging and allied forest management businesses working across Oregon. These companies are small-business independent contractors, who employ approximately 10,000 workers during a normal economy. The majority of forest contract work offered by the Oregon BLM is operated by AOL member contractors. Some of our member companies also purchase forestry and timber sale contracts directly from the BLM. AOL member companies depend on a reliable timber supply, including federal forests; and we therefore encourage federal forest plans that promote active management of federal forests in Oregon. As such, AOL represents substantial expertise in forest management, and we are direct stakeholders having a primary interest in the long-term management of the 6 BLM Districts in western Oregon. AOL members are directly impacted by the decisions that will be made as a result of this proposed RMP.

We respectfully urge you to consider our scoping comments regarding the Proposed RMP, as follows:

Scuttling the WOPR and re-planning again and again is wasteful and squanders trust. It is a wasteful use of taxpayer dollars to complete another redundant forest plan, which would be not unlike the recently scuttled 2008 Western Oregon Plan Revision (WOPR). Any new plan should be based on the science, evaluations and decisions completed for the WOPR. On the heels of the last two failed BLM forest plans (2008 WOPR and 1994 NW Forest Plan), your proposed re-planning will further squander any shreds of remaining trust among stakeholders who participated in your past two failed plans. In a time when the United States is facing record budget deficits, the BLM needs to be working to maximize productive forest economic outputs, rather than maximizing paperwork with another sham forest plan. Endless planning cannot be a lifestyle for the BLM.

Reconnect local government and forest management/timber revenue. The RMP should explicitly define how revenues will be generated—from timber sale volume, leases, permits, etc—to provide for county governments and schools. Forest management actions should be quantified and made legally sufficient to reaffirm the financial trust responsibilities specified in the O&C Act surrounding local governments. Reconnect revenue for local government to the forest and timber management.

Adherence to the O &C Act is vital to BLM forest management. I urge you to complete a forest plan that eliminates frivolous standards and guides that go beyond the statutory planning requirements contained in the O &C Act and the Federal Land Policy & Management Act. Any new plan must fully accomplish expectations stated in the O&C Act: *"…for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the principle of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to economic stability of local communities and industries, and providing recreational facilities…"*

Plan must assure accomplishing economic objectives. Proposed standards & guidelines must assure that when implemented to execute projects annually, the cumulative result is the accomplishment of the proposed amounts, volumes and desired forest conditions— in particular economic outcomes. Forest planning should make our federal forests work for all of us; and these forests need to be well-managed according to

a set of fiscally-prudent priorities that are implementable within existing and foreseeable budgets. In recent history, federal forest plans have naively promised many unattainable or frivolous resource protection standards—which indirectly resulted in the failure to accomplish economic objectives. Failure to accomplish economic and community social objectives is no longer an acceptable outcome.

Planned timber sale levels. The RMP must include provisions regarding the planned annual timber sale amount. BLM forests in western Oregon grow nearly a billion bdft/year of timber; annual harvest should be proposed for at least 600 bdft/year. A forest plan should determine forest harvesting levels, and include the planned timber sale program and the proportion of probable methods of timber harvest within the unit necessary to fulfill the plan. The RMP must contain an allowable sale quantity (ASQ), because that level, perhaps more than any other element of forest-wide planning, is critical to providing long-term direction to forest decision makers and BLM forest stakeholders—locally, state and regionally.

Accountability and objective metrics stated in RMP. The RMP should spell-out output metrics and their measurement. For example, the plan should say that XXX million board feet of sawtimber will be cut annually, which could be subsequently monitored and reported. The RMP should include a good-faith commitment to accomplish in practice the planned multiple use and sustained yield objectives and resource output quantities anticipated annually. Without such a commitment, the RMP becomes an empty planning exercise—as were the last two generations of BLM forest plans (1994 & 2008). The new RMP should include language that the BLM pledges to implement the multiple use objectives and output quantities stated in clear language. RMP should state volume using the Oregon custom of Scribner scale sawtimber volume, rather than the antiquated federal metrics not common to Oregon's forest sector.

Affirm importance of forest roads for forest management and recreation. Building and maintaining additional forest roads is a necessary forest management objective, which demands key consideration and legal sufficiency defined by the RMP. Responsible forest road & trail access, share cost agreements, easements, and other access routes are vitally important for both BLM lands and neighboring non-BLM lands. Forest road management actions should be quantified and made legally sufficient—as a necessary administrative component—to reaffirm the financial trust responsibilities specified in the O&C Act.

Accelerate procedures to shorten time to implement projects that treat catastrophic damages. The RMP should be as specific as possible about limiting the length of time to complete project plans necessary to respond to catastrophic forest damages—including wildfires, pests, disease, or storms. There needs to be clear expectation about expedited planning and implementation of catastrophic response projects. It is incumbent upon the agency to be expeditious and avoid disenfranchising those stakeholders and business partners needed to conduct forest management projects. Often, expeditious forest management projects are imperitive to make projects cost effective, revenue positive, and accomplish resource management objectives. BLM managers must have legal sufficiency from the RMP and discretionary authority to act in a timely manner to execute decision-making and implement important forest management projects—especially under catastrophic forest damages.

Boundary forests managed to accommodate neighbor values. BLM forestlands within ¼ to ¾ mile of non-federal land neighboring property should be managed carefully to protect important values of the neighbor. Sharing values among neighboring forestland property owners—particularly because of frequent BLM checkerboard ownership pattern—is critically important to assure effective forestland management on a local basis. BLM forests cannot be managed in a vacuum, especially if BLM values threaten neighboring values deemed customary and reasonable. Specifically, unhealthy, fire prone, diseased, or inaccessible BLM forests pose threats to healthy neighboring forests—and the RMP should thoughtfully mitigate BLM threats to surrounding Oregon forestlands. BLM RMP should provide legal sufficiency for decision makers to exercise discretion to specially-manage BLM forestlands where neighboring values are important.

Federal forest fire hazards are increasing private forestland protection costs. Overstocked and unhealthy federal forests and rangelands are threatening neighboring private forests/rangelands. Spreading wildfires, pests, diseases, and invasive species are leaving BLM forests and causing increased losses on neighboring non-federal forestlands. Federally-originated wildfires, escaped BLM prescribed fires, closed BLM forest roads, and BLM pest epidemics must be addressed by the RMP. The RMP should thoughtful identify BLM forest management strategies that control or mitigate this rising problem originating from BLM forestlands.

Local forest sector infrastructure vitality. Supporting a vibrant forest sector infrastructure should be a top priority for the BLM RMP. Infrastructure is defined here as forest product manufacturing, forest management operations, contract operators, transportation, forestry, nursery, research & development, forest education, forest suppliers/vendors, and forest agencies. In recent decades, insufficient federal timber supply, and federal forest management unpredictability, has greatly impacted Oregon's forest sector infrastructure. Sector infrastructure capacity continues to decline, in a large part resulting from declining, unpredictable, and high cost of federal timber. Mills are increasingly fewer and farther apart to provide competitive timber markets for specific forest log products—even in western Oregon.

Stream buffer widths match Oregon State Forests. The BLM RMP should reevaluate its unwieldy excessive riparian buffering, and adapt the riparian/aquatic standards applied on Oregon state forests. State forest riparian standards are based on practical science accepted by a large segment of the forest science community. Stream buffer widths should match those of Oregon State Forests.

Legal sufficiency for regeneration harvest, cutting large trees, and accepted silvicultural practices. The RMP should explicitly define and authorize accepted Oregon forest management practices recognized by the Society of American Foresters. For example, regeneration methods, harvesting large trees, salvage and sanitation harvests, site preparation, vegetation release, artificial regeneration, and aerial spraying of herbicides should be codified in the RMP. BLM decision makers must have the legal authority to exercise professional discretion to prescribe, plan and implements accepted Oregon silvicultural practices.

Redefine the use of scientific information. Past attempts to use "best available science" in decision-making has been terribly problematic—and must be revised to expect "practical science in local professional decisions." "Available science" or "practical &

available science" would be a more reasonable expectation, which would afford decision-makers the needed discretion to select available information that is cost-effective. No one can agree on what is the "best" science. This is litigation folly to forever seek a judge's interpretation of the very "best" of science.

Codify legal sufficiency for the BLM's multiple use mandate. Address the various multiple uses the BLM is required to manage for under applicable laws. Give equal weight to all three aspects of "sustainability": "social, economic and ecological". The BLM needs to actively manage important natural resources, such as timber, road access, recreation, minerals, grazing, and water yield. Objectives such as "restoration" and "ecological sustainability" should not be a dominant goal in BLM forest management. The new RMP must promote decisions to conduct active forest management projects that progress toward desired future forest conditions, on the desired mix of multiple use benefits, on allocating lands to management areas that allow the planned multiple use benefits to be achieved.

Cooperating agencies must include local government. Local governments, particularly rural communities and county governments, are concerned about federal forest management implications for their local economies. The new RMP should include coordination with local governments as a mandatory feature from the outset of forest plan development, amendment, or revision.

Responsible official District Manager. The District Manager should be the Responsible Official for forest management projects. The District Manager must have the legal authority to exercise professional discretion to make effect and efficient land management decisions that optimize the integration of multiple and competing resource values.

Lend greater weight to local business stakeholder input and needs. Public outreach should be left to the discretion of the responsible official—but as a minimum should redefine public outreach to lend greater deference and weight to stakeholder businesses and local governments. In this context, stakeholder businesses are those businesses, organizations and agencies that contract or otherwise engage in business transactions for managing BLM forestlands toward desired future conditions.

Not attempt to achieve individual species viability. The BLM must avoid temptations to identify and promise individual species protection mandates and standards. The BLM is only required to provide for diversity of plant and animal communities and preserve the diversity of tree species.

Standards and guidelines: The RMP should keep to a minimum the number of "standards and guidelines" that over-prescribe or unnecessarily limit the decision maker's professional discretion to manage BLM forestlands.

Climate change and adaptation not applicable for RMP. Addressing the potential and uncertain effects of future climate change on BLM forest management is best left to the local project NEPA environmental analysis. The best way to be adaptive to changing conditions is to have a healthy forest. We do not think it's appropriate to address the fleeting changes in cyclic climate patterns within the RMP.

Simple monitoring provisions to accept locally defined methods. Instead of focusing on "climate change," the agency should be looking at locally-determined resource objectives, such as timber outputs, recreational visitor days, and water quality and quantity.

Retain the improved objection process. It is a good idea to limit opportunities for objection to a proposed plan.

Reduce amount of process and paper work. The proposed RMP should improve forest conditions and make the BLM workforce job of managing forests easier. The RMP should add legal sufficiency and clarity to local decision maker discretion—thereby reducing legal obstacles and lawsuits by people who are opposed to natural resource use and management. Millions of more dollars have been misspent on past expanded planning, data collection, analyses, documentation, approvals, revisions, and so forth—which divert scarce funds from desperately needed on the ground forest management. Reduce process, procedures and analysis paralysis. Improve efficiencies for NEPA and project implementation.

Don't increase expectation for greater ongoing future "public input" (AKA "collaboration"). Local stakeholders have chronic federal forest "planning fatigue;" and your proposed disingenuous schemes to require additional "collaboration" in future project planning procedures are guaranteed to exacerbate the already fatal amount of local stakeholder distrust, frustration, and discouragement amassed during 30 years of failed/futile forest planning exercises in Oregon. Frankly, local stakeholders no longer trust the BLM or the US Forest Service, because both agencies have squandered past public input investments, because past agency efforts were shallow, dishonest, ignored input, and yielded at least two generations of failed forest plans. Since the 1980s, BLM and Forest Service forest planning in Oregon has been a complete exercise in futility for the local stakeholder. For thirty years the two agencies have demanded *continuous* public input; for thirty years the agencies have ignored local stakeholder input; for thirty years the agencies have broken virtually all its forest planning promises to those same local stakeholders; for thirty years the forest plans have failed to deliver promised resource outputs in Oregon; and for thirty years the agencies have effectively disassembled Oregon's local forest management infrastructure (manufacturing, business, industry, contractors, professionals, ranchers, and their local communities) necessary to sustain both the national forest and their neighboring local communities. Adding more unproductive public input process, demands for fruitless collaboration, would assure that the BLM has fewer staff resources and fewer land management actions.

Future proposed agency expectation that local stakeholders would repeatedly invest their scarce time in another decade of sham "public input" or "collaborations," would be tantamount to blackmailing those stakeholders to participate out of fear of losing more resource management. This is no way to manage a forest. BLM and Forest Service public involvement has become a sham; and adopting a new "collaboration" moniker does nothing to assuage the futility of federal forest plan public input. Any BLM reliance upon future collaboration for shaping projects will be rapt with additional waste, inefficiency, distrust, and abuse of scarce stakeholder energy.

Thank you for this opportunity to comment concerning the BLM Oregon Resource Management Plan Scoping. If you would like to discuss my comments further, please feel free to contact me at rexstorm@oregonloggers.org

Sincerely,

Rex Storm, Certified Forester
Forest Policy Manager; Associated Oregon Loggers, Inc.