

From: [Roger Brandt](#)
To: [BLM_OR_RMPs_WesternOregon](#)
Subject: Comment letter on West Oregon RMP regarding - innovative idea to increase economic productivity
Date: Monday, July 02, 2012 8:27:18 PM
Attachments: [BLM Scoping for 2012 RMP - comment regarding innovative idea Camps NSA.pdf](#)

Greetings,

Attached is a PDF version of a comment letter being submitted during the scoping period for the Western Oregon RMP and regards an innovative idea for management of western Oregon BLM lands to improve critical habitat, provide clean water, and contribute to local economies and support local communities.

A copy is pasted below in case the attachment does not open.

Thank you.

Roger Brandt
541 592-4316

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July 2, 2012

TO: Scoping Team - Bureau of Land Management, PO Box 2965, Portland, Oregon 97208
FROM: Roger Brandt, PO 2350, Cave Junction, OR 97523 541 592-4316
rpbrandt@frontier.com
RE: Western Oregon Resource Management Plan

Dear Scoping Team for Western Oregon Resource Management Plan (RMP)

The BLM asked:

- 1) *What should the BLM consider in the Western Oregon Resource Management Plan to further the recovery of threatened and endangered species and to provide clean water.*
- 2) *What new or innovative ideas should the BLM consider in the planning process for the Western Oregon Resource Management Plan?*
- 3) *How can BLM lands contribute to local economies and support local communities?*

An opportunity for increased productivity on BLM land while retaining values that improve habitat for endangered species, improve forest health and water quality, reduce fire hazards, create recreational opportunities, and provide employment and revenue for forest dependent communities, businesses, and industries can be found in a forest management proposal called the Natural Selection Alternative (NSA) written by Orville Camp in Selma, Oregon.

The compelling opportunity of the NSA plan has met resistance among BLM reviewers who compare its economic productivity with entrenched forest management practices

using incomplete economic analysis based on 19th century opinions on what type of forest products should be recognized as economically valuable. For the BLM to be innovative and more effective at contributing to local economies, maintain clean rivers, and preserve critical habitat the Agency must move away of antiquated presumptions about forest productivity from 200+ years ago and start thinking in terms of 21st century forest productivity as is being done with the NSA.

For example, the NSA plan calls for retaining the overhead canopy and culling only the trees that are poised to die naturally because they are not able to compete with more vigorous growing trees around them. Below compares how this strategy of forest management compares with the BLM contemporary management strategy.

Contemporary BLM forest management and its product output

The BLM counts only the output of logs and compares the NSA plan with landscape changing logging operations (stand replacing or select cut) where the only output is logs. The expectation for continued economic productivity from these lands is anywhere from 40-80 years before another harvest can be taken in a "stand replacement logging operation" but maybe sooner in a select cut. There are no other estimates made for subsequent cost of maintaining these altered landscapes and no effort to understand the overall cost/benefit this type of management approach contributes to the community as a whole and what it will cost society over the long term (20-80 years) in the way of fuel and fire control, erosion mitigation, loss of productivity in rivers (important to ocean based fishing fleets), tourism, recreation, real estate value, and the ability of a community to market itself to attract businesses and industries to establish their enterprise (jobs) near to these managed areas.

Economic outputs from the NSA plan

Timber production continues in a sustainable stream

Timber is extracted in a continuous stream under a full canopy that is collecting as much as 80% of the sunlight every day of the year versus a plantation where sun falls on barren ground between seedlings for a decade or more - lost productivity on an immense scale.

Fire hazard mitigation

At the same time, the full canopy shades the ground and prevents or impairs the growth of shrubs (canyon oak, Manzanita, buckbrush, tanoak, etc) that can choke the landscape and create severe fire hazards within 5-10 years after contemporary logging operations remove the canopy and the sun hits the ground. Contemporary logging requires either the spraying of herbicides to eradicate these shrubs, which also impacts sensitive or endangered species, or must pay the expense for crews to cut, pile, and burn these fuels, but must do this repeatedly because, as I have personally observed, brush in fuel reduction projects resprout from basal buds and can grow back within five years into an equally significant fire hazard. The NSA uses shade to control the growth of shrubs and in this way also reduces fire hazards and the need for the cost of reduction of fuels. In addition to this, shaded areas retain more water and higher humidity making lightning fires burn slowly and allow initial attack to be more effective at preventing catastrophic fires. Older trees naturally cull and drop lower branches in highly shaded areas, which remove ladder fuels. The NSA forest maintains a very low fire risk and safer environment for firefighters to work in. There is less risk of losing the entire forest in a fire, as frequently happens in uniform stands of BLM tree plantations.

Reduction of cost to address public outcry

Shade acts as an "herbicide" which is not controversial compared to the highly controversial use of chemical herbicides in forest management that result in public outcry, law suits, and demand on law enforcement to control demonstrations. This represents a

significant reduction in cost of forest management (no cost for herbicides and contractors to apply it) and cost of mitigating public outcry (millions of dollars in lawsuits and settlements, staff time diverted away from other work to address public concerns, and law enforcement to control demonstrations).

Increase in the productivity of other forest dependent businesses and industries

The NSA managed forest is shaded, scenic, provides habitat for a variety of plants/wildlife, and contributes to the scenic viewshed of the communities around it. These forests are suitable for recreational use (in contrast to thickets of brush that obstruct access into lands managed under contemporary logging practices) and provide a variety of recreational opportunities to include bird watching, a variety of plant communities, and shaded landscapes that are suitable for hiking, horseback riding, and mountain biking (in contrast to stump fields, weeds, thickets of brush, and disturbed ground baking in the sun - I hike hundreds of miles every year and frequently explore the back country and in all my experiences in southwest Oregon over the past 15 years I have seen every variation of these managed lands from recently cut to decades of growth and can say with a high level of authority that few if any of them are suitable for recreational use - when I see these lands it makes me feel that the BLM is helping the timber industry to run me off the land). The NSA forest provides many ways for a community to market itself and put other forest dependent industries to work. Recreational opportunities, scenic landscapes, and wildlife diversity increase the marketability of a community and increase the value of property and ability to attract retirees (with retirement income that supports businesses and services in a community) as well as home-based entrepreneurs and telecommuters and businesses and industries to establish their enterprises (all job creators) in the communities adjacent to BLM land. This represents a significant contribution that BLM forest lands can contribute to the development of employment and revenues in a community and is one of the products the NSA generates that the BLM gives no recognition to in assessing the value of this plan.

The current objectives of forest management on BLM lands is strongly biased to serve the economic interest and security of a single industry - the timber industry - which is based on a strategic objective that makes each acre of BLM land productive once every 40-80 years and does little to reduce the long range financial burden on society for fire control, habitat mitigation, and stream restoration while at the same time severely impairing the economic development of other forest dependent industries and spawning expensive lawsuits. The NSA broadens the benefits of forest management to include a wider variety of businesses and industries that can use the products of a NSA managed forest for generating an income, which makes each acre of BLM land productive every year while at the same time reducing long term cost of controlling fuel, improving habitat, and avoiding expensive lawsuits, which is all accomplished while producing a steady and sustainable output of logs for the timber industry.

The NSA offers a very innovative strategy for increasing forest productivity, reducing the cost of forest management, attracting a wider diversity of revenues into a community, and using the products of the forest to put more people to work. The BLM will not be able to adopt this innovation and apply its principles without taking a step toward the 21st century. Some suggestions for taking that step include:

1) Diversify the definition of "forest product"

The new RMP needs to recognize the forest has many products that can help a community generate an income to include logs, scenic landscapes, shade, wildlife/plant diversity, clean rivers, etc. The new RMP needs to develop a way of assessing the value of these products on an annual basis and how these products contribute to a community and create jobs in forest dependent businesses and industries (eg; tourism, recreation, real estate, ocean-based fishing fleets, etc) and all forest management planning needs to compare how a timber sale will help develop or take away from the value of these other

forest products and what the approximate cost will be in lost revenues for the forest dependent businesses and industries in community. If the loss is greater than what the timber sale will generate, then it would be a good idea to have a method to determine how the timber sale can be modified to improve the quality and diversity of forest product that are important to the widest range of forest dependent industries and balance this with a profitable value in logs for the bidder.

2) The new RMP must develop a complete cost/benefit analysis

It is highly deceptive to tell the public how much money will be made from a timber sale without giving them an estimate of what it is going to cost them over the long term to pay for fire control, fuel reduction, weed abatement and disease control, stream restoration, and landscape restoration that require tax dollars to be taken away from schools, social programs, and services to clean up after the timber industry. The community needs to see the ENTIRE cost of forest management over the span of decades that will impact residents today and their children tomorrow. A method needs to be developed to estimate what this cost might be and perhaps put this on a scale of best to worst scenarios; the lowest and highest estimate of what it will cost society to generate logs for the timber industry. A complete analysis should include an estimate of gains and losses of income and jobs in other forest dependent industries that become impaired when the forest products they depend upon are sacrificed in a logging operation. Conversely, compare any gains these industries obtain through forest management projects that increase their assets by sacrificing log production with an assessment of the losses in the timber industry. Look at these gains and losses over the span of decades not just the year of the proposed management project. The RMP needs to provide a mechanism for adjusting the outputs that benefit all industries to generate a diversity of jobs and contribute to the economic stability of communities and industries.

3) Broaden the meaning of sustainable forest/timber production

The current emphasis of forest management on O&C lands is to produce a sustainable *industrial* output of a single product - logs for the timber industry. This makes each acre of BLM land productive only once every 40-80 years by excluding all other forest dependent businesses and industries from strategic planning objectives. The BLM will make these lands much more productive, contribute a greater benefit to the economy of local communities, preserve critical habitat, and maintain cleaner rivers by developing forest management objectives that include the development of forest products that are needed by all forest dependent industries and assure they are treated with equal importance in the strategic objectives of the new RMP. It is important that the new RMP identifies visual resources, shade, clean water, etc as sustainable forest products.

The NSA needs to be given serious consideration because, as has been pointed out, the economic benefits to the community represent by an effort to broaden the definition of "forest products" and increase the scope of forest dependent industries that are included in strategic planning produces an economic outcome that is an admirable aspiration for any manager.

Sincerely,

Roger Brandt