

From: [Adams, Paul](#)
To: [BLM_OR_RMPs_WesternOregon](#)
Subject: Comments on BLM Western Oregon RMPs
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Attachments: [OSAF responses to questions by BLM for RMP scoping - 5July12.pdf](#)

Please note that I tried to submit these comments earlier using the online tool but received an error message when I clicked the "submit" button.

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Comments:

(Please note that the same comments are provided in the attached PDF)

**Comments on current BLM Western Oregon RMP effort, submitted by Paul W. Adams,
Chair, Policy and Legislation Committee, Oregon Society of American Foresters (OSAF):**

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. Although the OSAF has not taken a formal poll or position on the BLM RMP scoping, these comments provide a professional perspective that is expected to be generally consistent with the views of the broader OSAF membership. Some of these views are reflected in a number of relevant OSAF position statements that are mentioned at the end of this input.

These comments are submitted largely within the structure provided by the questions posed on the BLM website that focuses on this planning effort. However, it is important to note that the scope of these questions does not adequately address the major issues that the BLM must confront in management planning for its western Oregon lands. In this region, BLM planning and management actions are strongly guided by some unique federal laws and other policies, yet the questions explicitly refer to only one of these laws. And with its unambiguous language defining the specific management focus for these lands, direct references to the O&C Act are especially notable in their absence among the questions. Only the final question seems related to the mandates of the O&C Act, and its

late listing suggests an inappropriately subordinate position in focusing the planning efforts for western Oregon.

- *What would a successful plan look like to you?*

The plan would be consistent with the mandates provided by the law that defines the primary purpose and objectives of these BLM lands, i.e., the O&C Act, with due consideration of the planning and administrative directives under the Federal Land Policy and Management Act (FLPMA) of 1976. The plan would have clear and specific goals and objectives that would effectively guide the efforts of BLM forestry professionals. The plan would apply science-informed, well-proven and cost-effective management practices, tools and techniques. The plan would be implementable not only technically but also with respect to legal challenges like those that have greatly reduced active management and related benefits on federal lands over the past two decades. Implementation would be further enhanced by a plan that addresses key public questions and concerns, with clear communication of the rationale for decision making so as to gain necessary community, political and societal support.

- *What kind of management does BLM do that you like and would like to see more of? What kind of management does BLM do that you do not like and would like to see less of?*

Related the previous response, forest management plans and activities flow from the objectives established for a given area location, within the broader mandates of the applicable laws as well as with due consideration of local community concerns. These activities, and the specific forestry tools and techniques used, should be well-proven and cost-effective. OSAF supports active management, including mature and old-growth forests, where such management furthers the objectives for the resources in those forests. Although the “what I’d like to see” responses of individual citizens and organizations such as OSAF should be considered in the planning process, those preferences must be viewed and weighed within the limits of the applicable laws and other policies for management.

- *What is the appropriate scale and scope of the plan?*

A regional plan like this should be strategic in nature and include consideration of the primary forest benefits and resource conditions mandated by the applicable federal laws. A strategic plan would carefully consider the existing forest land base and its current condition in establishing broad management goals and objectives. The plan would define the necessary land allocations and related management templates/guidelines to accomplish the objectives over an extended planning period within landscape-level (e.g., medium to large watersheds) administrative units. However, the document would not include tactical or project-level plans or prescriptions, which are most effective when developed at the local level and with due consideration of site- and time-specific conditions. Even within a single BLM district, there can be a great range of forest conditions that require vastly different management strategies and prescriptions, such as those for the dry versus moist forest types on the Roseburg District.

- *What new or innovative ideas should BLM consider in this planning process?*

The BLM should consider active management of all forests, with the exception of those in designated wilderness and other unique areas where explicit restrictions exist. Plans for active management should include holistic consideration of riparian areas, mature and old-growth forests, early seral conditions, etc., and a long-term, move-around-the-

landscape strategy that better reflects forest dynamics and natural processes. Except for the most risky situations, broad application of the precautionary principle in federal forest management has not been proven effective in protecting or enhancing diverse forest resources. In fact, this approach has significantly decreased forest health and increased wildfire hazards and impacts over extensive areas of federal lands in the region. With the exception of designated wilderness areas, the need to protect lives and property from wildfire precludes a return to the natural, historic wildfire regimes that helped control forest densities and pests. In addition, research has shown that active management can accelerate the development of desirable ecological features of mature and old-growth forests. Although site productivity and rotation lengths are important related considerations, the use of regeneration harvests can be applied innovatively to retain desirable ecological features while also providing desirable early seral habitat.

In regards to the resources BLM manages:

- *What is the appropriate mix of old, mid-aged, and young forests on BLM lands?*

The mix of forest age classes should be considered in a manner consistent with the mandates of the O&C Act and the FLPMA. From a technical perspective, it is important to recognize that forest age is not a consistently reliable indicator of desirable forest functions and values, and some forest types naturally contain individual or groups of trees of widely different ages. The forest age mix flows from the management objectives rather than the reverse, and even then there must be some consideration for forests that include trees of varying ages. Management restrictions based solely on tree age or tree diameter are not science-based and thus should be avoided. Such restrictions can unnecessarily restrict the most effective management prescriptions and eventually can create “a lock with no key” when younger forests are managed to promote mature and old-growth forest conditions.

- *How can BLM provide habitat for fish and wildlife and contribute to the recovery of ESA listed species?*

BLM should use an interdisciplinary team approach, including silviculture specialists and wildlife habitat specialists, to design management objectives, strategies and related model prescriptions for a suitable range of forest and site conditions. As suggested earlier, these prescriptions would apply science-informed, well-proven and cost-effective management practices, tools and techniques. At the regional level, both forest and species/habitat plans should avoid prescriptive requirements that do not account for widely varying local conditions and thereby unnecessarily constrain effective management. Similarly, the new BLM planning effort should support opportunities to design and implement more effective landscape-level strategies for species management, while also eliminating or greatly modifying currently redundant and ineffective requirements such as “Survey and Manage.”

- *How should BLM manage forests to protect property and ensure our forests are fire resilient?*

BLM should continue to support CWPPs while also expanding efforts to develop landscape-level strategies that lead to broadly resilient forest lands. Estimates of pre-settlement forest conditions as well as current fuel hazard guidelines can support these strategies. Because management for fire resiliency is essentially ongoing, plans should integrate projections of changing forest conditions over an extended period to help target and maintain adequate treatment levels and related support for management.

- *How should BLM-administered lands be managed to contribute to clean water and safe*

drinking water?

Experience and monitoring data have shown that, with few exceptions, compliance with Oregon's Forest Practice Rules can ensure clean water for beneficial uses that include domestic supplies. As basic standards, these guidelines could be adjusted where warranted by local resource conditions, concerns and management objectives. Such adjustments could consider direction under the Aquatic Conservation Strategy (ACS) of the Northwest Forest Plan (NWFP), although the NWFP and the ACS both date back to 1994 and thus do not reflect current science.

- *What types of recreation opportunities should there be more of or less of on BLM lands?*

Recreational values and opportunities should be considered in a manner consistent with the mandates of the O&C Act and the FLPMA. Results of current surveys of a range of user groups as well as projections of future demographic trends and needs should be considered. For example, recreational activities and access needs may differ widely between younger and older age groups as well as between rural- and urban-based citizens. Plans for specific recreational opportunities should be carefully integrated with other forest resource objectives and plans, as some recreation activities are more or less compatible than others.

- *How can BLM lands contribute to local economies and support local communities?*

The O&C Act provides the basic foundation and mandate for these contributions. However, both strategic and tactical planning by BLM can include pointed consideration of specific forest management links and benefits to local communities and economies. Regardless of the final, specific mix of goals and objectives in the BLM management plans, it is essential to acknowledge the interdependence between successful forest resource management and healthy local communities and infrastructure.

The Oregon SAF has several formal position statements that relate to and support a number of the responses above. They are available at <http://www.forestry.org/oregon/policy/position/> and include:

- Active Management to Achieve and Maintain Healthy Forests
- Commercial Harvest on Public Lands in Oregon
- Managing Mature & Old-Growth Forests
- Managing Riparian Forests
- Clearcutting

END OF COMMENTS