



## THE WILDLIFE SOCIETY OREGON CHAPTER

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7 January 2008

Western Oregon Plan Revisions  
P.O Box 2965  
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**RE: Public Comments to the Bureau of Land Management regarding: Draft Environmental Impact Statement for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management Districts of Salem, Eugene, Roseburg, Coos Bay, and Medford districts and the Klamath Falls Resource area of the Lakeview District (hereafter, DEIS).**

Dear Director Edward W. Shepard:

Thank you for the opportunity to comment on the DEIS of the Revision of the Western Oregon RMPs. The Oregon Chapter of The Wildlife Society represents over 300 wildlife professionals in Oregon. One of our chapter's goals is to provide information on wildlife issues to aid public discussion of natural resource management in our state and to promote the application of sound science in resource management decisions. The alternatives presented in this DEIS are likely to have important consequences for Oregon's native wildlife species and resource management decisions within our state.

This DEIS includes four alternatives for managing the land base:

- The No Action alternative describes the current strategies under the Northwest Forest Plan (NWFP).
- Alternative 1 retains Late Successional Management Areas (LSMAs), similar to the Northwest Forest Plan. It differs from the Northwest Forest Plan in having smaller

riparian buffers, no structural retention in clear cuts, and no retention of northern spotted owl activity centers in the Timber Management Areas (TMAs).

- Alternative 2, which is the preferred alternative, also contains both LSMAs and TMAs, however the extent of LSMAs is less than Alternative 1 and the No Action Alternative with the TMAs covering more of the land base. As with Alternative 1, green tree retention is not required in clear cuts, and no owl activity centers are retained in TMAs. This is the “preferred alternative.”
- Alternative 3 focuses on providing habitat conditions for late successional species throughout the landscape without designated late successional reserves. This approach maintains and promotes structurally complex forests while having continuous timber production. Spotted owl and marbled murrelet sites would receive protection until a landscape target was reached.

As an organization whose mission includes promoting stewardship of wildlife and their habitats through the use of sound ecological information, we have a number of concerns regarding the three alternatives presented in this DEIS with respect to wildlife populations and wildlife habitat in western Oregon. We are particularly concerned about impacts on wildlife species that require late successional habitat and our review of the DEIS emphasizes potential impacts on these species. We believe that the preferred Alternative 2 would be particularly detrimental to wildlife species in western Oregon that require late successional habitat including the threatened northern spotted owl and marbled murrelet.

### **Primary Concerns Regarding Effects of Alternatives 1, 2, and 3 on Wildlife Species in Western Oregon:**

- The BLM proposes to eliminate Northwest Forest Plan (NWFP) protections of old-growth forests and old-forest associated species and abandon the NWFP
- Aquatic Conservation Strategy. These actions are likely to negatively affect numerous wildlife species.
- The BLM’s preferred alternative (Alternative 2) would nearly triple logging from 268 million board feet (mmbf)/year to 769 mmbf/year, including a doubling of the area of late successional forests logged. In the first decade, BLM proposes to clearcut 143,400 acres (~224 square miles) or 12% of the harvest land base.
- The agency’s preferred alternative (Alternative 2) would reduce late-successional reserves (LSRs) established under the NWFP by 47% from approximately 936,000 acres to 494,000 acres and Riparian Reserves by 57% from approximately 364,000 acres to 156,000 acres.
- The DEIS has numerous scientific flaws, including models that predict limited or no impacts from logging to fisheries or endangered species in spite of substantial reductions in stream buffer widths and old growth forest protections.
- The DEIS relies on a draft spotted owl recovery plan that recently failed scientific peer review and it is linked to reductions in critical habitat proposed for the threatened northern spotted owl and marbled murrelet by the United States Fish & Wildlife Service (USFWS).

- Courts have previously ruled that the NWFP was the minimum necessary to provide for the survival needs of the northern spotted owl and other species that depend on late successional forest. The reduction in size of late successional forest reserves and riparian protections presented in the three alternatives in the DEIS may fail to meet the legal requirements for protection of threatened and endangered species in western Oregon.
- A reduction in riparian buffers will make it difficult for the BLM to comply with the Clean Water Act as the narrow stream buffer widths and lack of green tree retentions in uplands will likely result in additional sediment runoff, higher stream temperatures, and greater potential for landslides and floods.
- Because the agency has not applied sound science in the development of this DEIS (e.g. heavy reliance on the flawed 2007 Draft Recovery Plan for the Northern Spotted Owl and model outputs not supported in science), we recommend that the entire WOPR go through independent peer review.
- The proposed alternatives increase fire hazard and severity throughout the plan area while reducing the resiliency of forests to fire. The Fire and Fuels Management Objectives common to all alternatives appear to conflict with the specific Management Actions and the effects of the preferred alternative. For example, the Management Objective “Promote ecosystem function and resiliency” is difficult to reconcile with the Management Action “Immediate action to control and suppress all wildfires would be taken in all areas” (DEIS Pg. 33). The preferred alternative would create 14,340 acres/year of even-aged plantations that are highly susceptible to crown fire (DEIS Pg. 770).
- The DEIS fails to adequately assess the impacts of Global Climate change and does not address the effects of logging old forests on carbon cycles.
- The DEIS underestimates the potential impacts of the exotic plant disease Sudden Oak Death and fails to disclose the effects of a large increase of logging on the spread of this emerging disease.
- Alternative management strategies that rely on logging of small trees (<80 years old) could potentially produce a sustainable source of timber from O&C lands while protecting the last remaining stands of old-growth timber and the forests, salmon, and clean water valued by Oregonians. Such alternatives were not considered in this DEIS.

## **Detailed Comments Regarding the Scope and Management Directives of the DEIS and Potential Effects on Wildlife**

### **1. BLM lands occupy a unique location on the landscape in western Oregon.**

BLM lands are uniquely located with respect to other federal forest lands in western Oregon (Forest Service and National Parks). BLM lands are generally lower elevation than other federal forest lands, and there is BLM ownership in parts of the state lacking other federal ownership, particularly in the region southeast of Coos Bay as well as along the Willamette Valley fringe. BLM lands are located between large blocks of U.S. Forest Service (USFS) land, particularly between the Coast Range and Cascades in the Eugene and Roseburg District areas as well as in the Rogue Valley. BLM lands provide important habitats for numerous species in these areas and they provide connectivity among larger blocks of other federal lands in western Oregon.

Additionally, BLM lands are interspersed with private lands throughout most of their Western Oregon ownership. Although this may limit the quality of large blocks of habitat that can be provided on BLM lands, late successional habitats in these areas are likely providing important functions for various wildlife species, and this ownership pattern shouldn't minimize the important role that these lands play in providing habitat for native wildlife, especially for late successional species. In fact, many spotted owl activity centers currently occur within the context of the BLM checker-board ownership.

## **2. Components of Alternatives that are Problematic for Wildlife Species in Western Oregon**

### **Late successional habitat**

Because of their unique location on the landscape and the presence of threatened species, a network of designated late successional habitat in large areas is appropriate for BLM lands. Allowing appropriate and careful active management in areas designated for late successional species will be important to maintain overall forest health (e.g. avoidance of catastrophic wildfire, insect outbreaks). Under the NWFP strategy, riparian buffers provide habitat connectivity among patches of late successional forest. When applied to existing, functional late successional habitat, the reduction in size of riparian buffers under the action alternatives (particularly Alternatives 2 and 3) would result in substantial fragmentation and isolation of the remaining late successional forest.

### **Retention of Structural Elements**

In addition to a role in providing habitats for late successional species, BLM lands also have a unique role to play in providing complex early seral habitats important to many wildlife species. Current forest management practices on both public and private lands in areas of western Oregon may be reducing the amount of young-forest types containing shrub communities, remnant snags, and down wood. Structural retention in regeneration harvest provides important habitat to native wildlife for several reasons. Some species of native wildlife, such as western bluebirds and olive-sided flycatchers, specifically select these early seral habitats with structural retention. In addition, structural elements retained at regeneration harvest will continue to provide elements of structural diversity and wildlife habitat throughout the development of a forest stand that otherwise would not be present again until the stand reached a mature forest stage.

Two of the alternatives (1, 2) in the DEIS include a strategy for clear-cut harvesting in Timber Management Areas without retention of structural elements. This type of regeneration harvesting is also a typical management practice on many/most private forest lands. If the BLM were to manage without providing structural retention in clear cuts, these habitats could become scarce and potentially absent from some regions. Providing early successional habitat with structural retention is an appropriate management practice on BLM lands and would contribute to their role in ensuring the viability of native wildlife species. In addition, the proposed clear-cut strategy without retained structures is below the standards set forth in the Oregon Forest Practices Act. Although the BLM is not required to meet Forest Practices Act regulations, for the benefit of wildlife it is appropriate that they meet or exceed the minimum standards set forth

in the Act. Currently, management activities conducted by the BLM greatly exceed the FPA (retaining  $\geq 6$  live trees and  $\geq 1$  snag vs. the 2 snags or green trees required by the FPA).

### **Unique habitats**

Areas of Critical Environmental Concern (ACECs) are set up to protect some unique habitats. The no action alternative protects 94 of these; Alt. 1 protects 92, Alt. 2 protects 93 and Alt. 3 protects 82. In addition to protecting fewer Areas of Critical Environmental Concern, Alternative 3 would convert stands of “commercially undesirable tree species” or with “an inadequate stocking of desirable tree species” to stands fully stocked by desirable tree species. The result of this would be conversion of hardwood stands to conifer stands. Hardwoods are tremendously valuable habitats for a wide variety of wildlife species. Conversion of these stands would reduce the biodiversity of BLM lands under all action alternatives

## **3. Species-Specific Comments**

### **Northern Spotted Owl**

As a federal land management agency, the BLM has an important role to play in contributing to the recovery of the northern spotted owl. The 1994 Draft Recovery Plan for the Northern Spotted Owl clearly states that recovery of the species relies on federal lands. Currently, BLM lands are playing a significant role in the recovery of the spotted owl. In a recent assessment of spotted owl populations, only three of eleven study areas had stable populations of owls (Anthony et al. 2006. Status and Trends in Demography of Northern Spotted Owls, 1985-2003. Wildlife Monographs 163:1-48). Two of the three areas had federal land ownership that was made up almost entirely of BLM lands (Lint, Joseph, tech. coord. 2005. Northwest Forest Plan—the first 10 years [1994-2004]: status and trends of the northern spotted owl populations and habitat. Gen. Tech Rep. PNW-GTR-648. Portland, OR: US Department of Agriculture, Forest Service, Pacific Northwest Research Station, 176 p.)

The no action alternative continues implementation of the Northwest Forest Plan and retains all existing Late Successional Reserves. Alternative 1 is similar to the no action alternative and retains Late Successional Management areas that are similar in size to existing Late Successional Reserves although riparian buffers are reduced in size. Alternative 2 retains some Late Successional Management areas, but they are much smaller in size (521,000 acres vs. 807,400 acres). Alternative 3 does not contain any areas specifically designated as reserves or late successional management areas, although it does manage the entire landscape for the general purpose of creating late seral habitat using long rotations.

The No Action Alternative has the highest likelihood of significantly contributing to spotted owl recovery. Alternative 1 retains significant areas that will provide large blocks of habitat for spotted owls, maintains significant acres of suitable habitat outside of the large blocks, and maintains dispersal habitat. However, reduced riparian buffers will increase habitat fragmentation which may negatively affect owls, possibly by restricting dispersal ability.

Alternative 2 provides habitat for owls including some larger blocks of late successional forest, however, it has several potential deficiencies with regard to supporting stable owl populations (i.e. total acres of habitat, distribution large blocks of habitat, contribution of habitat outside of LSA's, contribution of dispersal habitat). Alternative 2 allocates many fewer acres of habitat to LSA's than does Alternative 1 (521,000 acres vs. 807,400 acres, respectively). It clearly states in the DEIS that because it will take time for habitat to grow within LSA's, existing habitat outside of LSA's will be very important for the first 50 years while habitat develops within LSA's. Alternative 2 will lead to a decline in habitat outside of LSA's in the first 50 years. Thus, this may lead to a precarious situation for owls whereby not only will there be less habitat in designated LSA's, but habitat outside of LSA's will also be reduced before habitat within the LSA's is fully developed.

Alternative 3 is a unique approach to forest management that could have many potential benefits to wildlife. The objective of providing for the habitat conditions that are required for late-successional species is a more ecosystem-management-based approach that may provide more wildlife benefits than specifically providing habitat conditions for spotted owls and marbled murrelets. Using rotation ages based on disturbance regimes for specific areas is also a sound scientific-based approach. However, a primary problem with this alternative as it relates to spotted owls is increased landscape fragmentation. The BLM might want to consider some general rules for locating harvest units that would minimize fragmentation of late successional habitats. Additionally, establishment of some of the larger reserves of late-successional habitat would improve the benefits of this alternative for spotted owls and other late-successional associated species. A monitoring approach to test the assumptions of their plan, and an adaptive management process, will be critical to its success.

We cannot support Alternative 3 as currently written because it is not supported by current science. It does not provide sufficient protection for spotted owl habitat and is therefore unlikely to contribute to recovery of spotted owl populations. Alternative 3 will not lead to development of large blocks of habitat (stated to be needed for recovery in the DEIS) but will instead fragment owl habitat. If modified, Alternative 3 may have potential to be beneficial to spotted owls. The concept of long rotations for stands located in the appropriate landscape areas and harvest strategies that focus on retention of legacy structures (large trees, snags, and logs) has potential for creation of sustainable owl habitat. However, as written, Alternative 3 would not have a high likelihood of contributing to owl recovery. In order to potentially benefit spotted owls, the following components need to be addressed:

- Justification is needed for the use of a 215 acre zone of “protection” for spotted owls. Typically a 500 acre zone is used/recommended by the USFWS in which habitat must be maintained. The home range size of northern spotted owls in the southern Oregon Coast Range is typically > 2400 acres.
- It does not appear that owl populations will be monitored and it is not clear if new owl sites will be protected.
- It is not clear what would happen to protected owl sites once the landscape reaches the 50% criteria of being above a certain age. Will the owl sites then be harvested? This does not seem acceptable without some corresponding analysis to document that 1) owl

populations are doing well on BLM lands, and 2) owl populations are expanding into the recently-developed older age classes.

- Planning of harvest activities across the landscape needs to be addressed. Reserves for owls are not a component of Alternative 3; however, a much greater benefit to owls could be achieved by pre-planning harvest activities on the landscape such that large blocks of habitat would be maintained for owls until replacement habitat was grown and documented to be used by owls. In this way, large blocks of habitat could be provided for spotted owls, but those large blocks of habitat would not necessarily be excluded from timber harvest indefinitely.

### Comments Regarding the Owl Analysis

- It is not clear why it was decided that 90% of BLM lands had to be habitat before the BLM lands could qualify as contribution towards large blocks of habitat. Is this because of the fragmented nature of the BLM lands? Is the 90% threshold assumed to be needed to meet the 50% habitat threshold recommended by the USFWS?
- If so, was it assumed that everything outside of BLM lands would be non-habitat?
- Was the same 90% threshold used even for BLM lands adjacent to USFS lands or within larger blocked-up sections of BLM lands? If so, the 90% threshold is likely an overestimate of the amount of habitat on BLM lands needed before contributing to large blocks of habitat.
- The owl analysis did not include acres/areas that would qualify as murrelet habitat in the statistics. Was it not possible to include those acres? If so, why? This needs to be made clearer. If it is possible to include the murrelet acres, those should be added. If not, the relative added contribution of designated murrelet habitat to total acres of suitable owl habitat should be addressed. For example, are the acres of murrelet habitat to be added consistent across all alternatives or are they expected to vary?
- How many known owl sites would be inside vs. outside of LSR's/LSA's for the No Action Alternative, Alternative 1, and Alternative 2? This information would give a clearer indication of the number of current owl sites that would be included/omitted from the special owl emphasis areas.
- How will owl sites outside of LSR's/LSA's be treated in each of the alternatives? Can they be harvested? If so, when? Alternative 3 has a stipulation that known owl sites will be protected for a period of time while habitat grows, but no such provision is indicated for the other action alternatives.
- Chapter 3 presents a detailed classification schedule for spotted owl habitat. It is not clear what this table is based upon, or what accuracy it may have in classifying actual habitat. It is also unclear what data are being used for the classification, and what level of accuracy there is in the stand data, particularly for snags and down wood. In addition, it may not be appropriate to have the same classifications for all parts of the owl's range. The DEIS should provide more information about this schedule that the reader could evaluate. The accuracy of such a detailed schedule is questionable without more information. We recommend that a simpler schedule be used or developed for classifying owl habitat.

- Using the 2007 Draft Recovery Plan as justification for planned management actions is not acceptable. The 2007 plan was widely criticized by experts for its failure to apply the best available science.
- Table 190—It is not clear what the acre values are in the 2nd – 4th columns. Are some of these columns only for BLM acres?

### **Marbled Murrelet**

The DEIS uses the best available habitat classification model for marbled murrelet nesting habitat. However, this model has not been validated. Federal lands, including BLM lands, play a key role in the recovery of threatened species, including the marbled murrelet. Although all alternatives result in an overall increase in suitable habitat for murrelets over 100 years, short-term protection of habitat and occupied sites is critical to species recovery. The Marbled Murrelet Recovery Plan identifies the following short-term actions necessary to stabilize the population:

- Maintain occupied habitat
- Maintain large blocks of suitable habitat
- Maintain and enhance buffer habitat
- Decrease risks of nesting habitat loss due to fire and wind throw
- Reduce predation
- Minimize disturbance

The No Action, Alternative 1, and Alternative 3 protect all known occupied sites, and thus make more of a contribution to recovery of the murrelet than Alternative 2 which protects only the currently known occupied sites. Alternative 2 would likely result in harvest of occupied sites, which would not make a positive contribution to recovery of the species. Under No Action and Alternative 1, occupied sites would be protected for the duration of the plan; however, the length of the proposed time frame is unclear. Alternative 3 would protect sites for varying amounts of time depending on the province where they are located, ranging from 10 years to 100 years ((but 40-50 years is expected in most areas). Depending on the duration of the plan, there may not be much of a difference between these alternatives in protection of occupied sites.

No action, Alternative 1 and 2 provide assurance for large blocks of suitable habitat. The assessment of Alternative 3 is that existing suitable habitat would be fragmented. The alternatives that provide for large blocks of suitable habitat will be more likely to provide for species recovery and reduce predation. Allowing some management of suitable habitat may be important to decrease risk of nesting habitat loss due to fire. This would be allowed in Alternatives 1, 2, and 3, but not in the No Action alternative.

### **Fisher**

The fisher is not yet listed under the ESA, although it may reasonably be expected to be listed at some point in the future. It is somewhat difficult to assess the BLM's proposal on this species without a Recovery Plan identifying priority habitats and actions. It is not clear how habitat has been identified in the DEIS. The major threat to the fisher is identified as timber

harvest. Therefore, the alternatives involving the least harvest would best provide for this species overall, particularly the No Action alternative. Alternatives that provide connectivity to large scale reserves on USFS lands will be critical to potentially expanding fisher populations in the future. Currently, fisher are present only in the Medford District. In the short-term, this will be the most important area for fisher conservation. It is unclear what habitat declines in the Roseburg and Coos Bay Districts will ultimately mean for this species.

## **Landbirds**

This section describes the likely affects of the various alternatives on a variety of landbirds. The analyses rely on the Partner's in Flight conservation strategies written for Oregon and Washington. The Partner's in Flight strategies identify key habitats important for landbirds, identify conservation targets for those habitats, and identify focal bird species associated with key habitats. Use of the habitat targets proposed in the Partner's in Flight strategies in the DEIS analyses is appropriate, but it should be made clear that the targets proposed in those strategies have not been researched or validated. The strategies were peer-reviewed, but no field research has been conducted to validate the strategies.

The authors of the DEIS misinterpreted the use of the Partner's in Flight Focal species. In the DEIS, they are listed as "species of concern" for each habitat type. In fact, the Focal Species are often not species of special concern, but are more common species that are easier to monitor. Habitat targets may be developed around a focal species, but it is assumed that establishment of conditions that favor the focal species will also likely benefit many other species with similar habitat requirements. More background information is needed in Chapter 3 on how the targets in the strategies were used. For example, for the eastside/Klamath area analyses, why was only one general objective (e.g., no net loss) analyzed rather than the many, more specific objectives contained in the strategy (size and distribution of patches, density of trees/snags)?

The analyses used in the landbird section are very general. As such, the results are not specific to the habitat types or conditions listed in the Partner's in Flight strategies or to the species of landbirds being considered. An analysis more similar to the one conducted for forest-floor associated species (in Special Status Species section) would be more appropriate for this section. The Partner's in Flight strategies contain specific targets for multiple habitat conditions that could be linked to the BLM stand conditions used in the DEIS. A similar habitat quality scoring system as used for the Forest Floor species analysis could be used for landbirds. This would result in a more meaningful analysis and adequate disclosure of impacts to the public and the Decision Maker

The landbird section needs to more clearly address the species that require snags. Many of the snag-associated species are lumped in with other groups of birds rather than in with the snag-associated group. There needs to be a better analysis of the implications of the various alternatives on snag resources and snag-associated species. On page 703 (Klamath Falls Resource Area), it is not clear what, if any, habitats for landbirds will be provided in the Klamath Falls Resource Area. It is made clear that structurally complex forests will not occur on BLM or private lands, but it is not clear what stand types WILL be provided for on BLM lands. A graph similar to the graph on page 247 would enhance understanding for the Klamath area.

Additionally, the 1st full paragraph on page 704 (starting, “Uneven-aged management under Alternative 3...”) contains conflicting statements. It first states that uneven-aged management would result in multi-layered stands but in the next sentence, states that stands would not meet mature, multiple canopy or structurally complex forest structural stage classifications. If this paragraph is not in error, it needs to be made clearer why uneven-aged management will not lead to structurally complex forests.

### **Special Status Species**

In chapter 3, Table 100, Neotropical Migrants there are several errors. The white-headed woodpecker, three-toed woodpecker, black-backed woodpecker, and Lewis’s woodpecker should be listed under “snag dependent” wildlife. Some of the other species listed here are NOT neotropical migrants. Neotropical migrants are birds that migrate to Mexico or south of Mexico in the winter. Some of the species listed may migrate short-distances, but they do not migrate as far south as Mexico. The rest of the species can stay in one group if the name is changed to “songbirds.

### **Summary and Recommendations**

In summary, we believe all three alternatives presented in the DEIS would result in unacceptable, significant risks to wildlife species that depend on late successional forests in western Oregon. Furthermore, it appears the alternatives emphasize maximum timber harvest at the expense of maintaining healthy forests on BLM lands in western Oregon over the long term. Maintaining late successional forest habitat for wildlife populations and conducting sustainable timber harvest are not mutually exclusive. We believe that the BLM needs to develop a management strategy that better addresses the habitat requirements of Federally listed species in western Oregon. We are also concerned that the BLM failed to use the best available science (see spotted owl and marbled murrelet comments) when considering the effects of management actions on wildlife species. The following are some specific recommendations:

1. The Resource Management Plans for western Oregon should include late-successional reserves of a size sufficient to provide habitat for northern spotted owls and marbled murrelets over the long-term.
2. Timber management strategies should include retention of green trees, snags, and down wood at levels sufficient to provide habitat for wildlife species native to western Oregon.
3. The tree species composition of BLM forests should match native forest species for given region and not include only species of economic value (Douglas-fir).
4. The BLM needs to reconsider its strategy for management of riparian buffers. Streams on BLM lands in western Oregon provide habitat for at-risk salmonid species. Additionally, science has demonstrated the importance of intermittent streams in watershed function. As written, the 3 alternatives in the DEIS fail to provide sufficient protection for riparian habitat.

5. We recommend that the plan go through external peer review to ensure that the best available science is used.

Thank you for the opportunity to comment on this document.

Sincerely,

*Bruce Campbell*

Bruce Campbell, President  
Oregon Chapter of The Wildlife Society

*Betsy Glenn*

Betsy Glenn, Conservation Affairs Committee  
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