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BLM, Oregon/Washington State Office
Attention: Western Oregon Planning Revision (OR930.1)
P.O. Box 2965
Portland, Oregon 97208

NOTE: 2 copies sent
1) Ed shepard
2) WOPR

Ed Shepard, Oregon/Washington State Director
Bureau of Land Management
333 SW 1st Street
Portland, OR 97204

RE: BLM Draft WOPR Comments;
2005 Applegate Adaptive Management Area Collaborative Watershed Restoration Proposal

Mr. Shepard and the Western Oregon Planning Revision Leadership Team,

This communication is submitted as official public comment on the *Draft Western Oregon Plan Revision.*

Our response addresses three primary issues:

1) Special acknowledgement and collaborative management of the Applegate Watershed.
2) Unique ecosystems of southwestern Oregon
3) Historical national and international recognition of the Applegate Partnership and/or the Applegate Watershed

We have also included an addendum, which summarizes our involvement with our response to the WOPR.

1.0 Special Acknowledgement/Designation

The Draft WOPR makes no mention of the Applegate Adaptive Management Area (AMA) nor the collaborative land management with Applegate Partnership. The Applegate Partnership recognizes that it would be pre-decisional for the BLM to *designate* the Applegate Watershed as a special management area prior to BLM making a decision as to which alternative, or combination thereof, will finally be chosen to guide management of O&C lands. It has been suggested by the BLM that the proper vehicle to make this designation should be accommodated through a Memorandum of Understanding (MOU) with the Applegate Partnership at the Medford District Level. *While necessary, an MOU does not entirely meet our needs.*

The Applegate Watershed was established as an Adaptive Management Area as part of the Northwest Forest Plan in 1994. The Applegate Partnership has had MOUs in place with both the US. Forest Service and the Bureau of Land Management since that time. These MOUs established the collaborative nature of land management alternatives and decisions that have guided the development of various treatments of these lands over the past 12 years.

These MOUs have been given land management backbone *only* because of the specific designation of the watershed as an AMA through the Northwest Forest Plan. Success has been achieved on the ground in the Applegate AMA because:

1) The federal land managers in place (District and Resource Area Managers for the BLM and Forest Supervisor and District Rangers for the USFS) have generally been either receptive or *proactive* to managing the Applegate watershed *collaboratively* and in keeping with the *landscape-level ecosystem* approach; and,

2) Partnership personnel and affiliated organizations and individuals have similarly dedicated thousands of hours of personal time to make this work in an environment that is highly charged with strong voices from both the timber interest and the environmental community.

We understand and acknowledge that much of the detailed land management activity that we are seeking for the Applegate Watershed is best delineated and more appropriate in the new Medford District Resource Management Plan (RMP), rather than in the WOPR. *The Applegate Partnership agrees that a MOU is a useful tool for collaborating with various community groups, but we feel it is not entirely sufficient in the case of the Applegate Watershed.*

An MOU is a mutually agreed-upon, non-binding agreement between both parties. We are not willing to rely on the use of an MOU to codify the collaborative relationship between the Applegate Partnership and the BLM, because either party can easily dismiss the MOU without cause. While outright termination of an MOU concerning the Applegate Watershed is highly unlikely, the success is based *solely* on the personal style and interest of the federal lands managers in charge. We are concerned that *benign neglect* by an agency manager not interested in collaboration, nor dedicated to the ecosystem-wide approach to land management, could easily undo more than fifteen years of successful land management collaboration and progress.

In essence, we are seeking assurance that the agency will be *required* to continue to work with the community on this watershed planning process, regardless of individual likes or dislikes of the ever-changing personnel within the agency, or because of the guaranteed policy shift with each administration change every four or eight years.

We have invested 15 years in this highly successful process, and today there is only one agency person at the District level in a position of authority who has any historical perspective of what has transpired between the agency and the Applegate community since 1992. *This lack of surety does not give us great confidence that the nature of our work has any long-term viability or sustainability with an agency that is conditioned with perpetual change.*

In light of this history, the Applegate Partnership is asking the BLM to <u>acknowledge</u> (not designate) that there exists within the O&C lands areas of special interest or unique landscapes that offer valuable collaborative land management opportunities to the BLM, the details of which will be developed by each BLM District and included in their RMPs. One such opportunity is the Applegate Partnership and the Applegate Watershed.

The Applegate Partnership is <u>further requesting</u> that the *acknowledgment* of these special or unique landscapes be applicable to all of the Alternatives, rather than just in

the No Action and Alternative #3, and that this be codified within the WOPR documentation regardless of the Alternative chosen. Any specific management plan developed at the District level can then be tiered back to the specific acknowledgment in the WOPR, which in turn *provides assurance to the community that the Agency is willing to put its money where its mouth is.* Without this specific reference in the WOPR, communities such as the Applegate will continue to be vulnerable to the whims of changing personnel and changing policy, neither of which is beneficial to long term, responsible management on our public lands.

Our request for the BLM's *acknowledgement* of the uniqueness of the Applegate's collaborative land management is based upon our success on the ground, as well as on many federal mandates regarding collaboration.

The *Healthy Forests Initiative* and the *Healthy Forests Restoration Act* state that land management agencies must provide the time and opportunity for public collaboration, particularly when dealing with wildfire and hazardous fuels mitigation efforts. Unfortunately, no mention of the significance of either of these documents was found in the WOPR, except for the listing of the HFI in Volume III, "References". There is also no mention of required "Community Wildfire Protection Plans" which we all know are a significant part of today's forest health/wildfire issues. The *Applegate Fire Plan*, a recognized CWPP written in 2002, addressed hazardous fuels reduction, forest health, prescribed fire, ecosystem health, species diversity, and fire-resilient stands; and it is being implemented. More than twenty-two strategic, priority projects are currently being implemented or have been completed on private and public lands within the past five years. *We feel this is an exceptional measure of success that cannot, and should not be ignored by the BLM.*

The *National Fire Plan*, although not a single, cohesive document, also propounds working with local communities. Collaboration with the public and communities is "the cornerstone" of *A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment: 10-Year Comprehensive Strategy Implementation Plan,* which guides implementation of the National Fire Plan. Please note that the title refers to risks to communities and the environment, something that the Applegate Fire Plan clearly addresses. Why is neither document mentioned in the Draft WOPR, save a brief reference to the National Fire Plan as an example of a "new policy" on page 5?

Executive Order 13352, dated August 26, 2004 is entitled *"Facilitation of Cooperative Conservation"*. Its Purpose is to ensure that the Department of the Interior (and others) implements "laws relating to the environment and natural resources in a manner that promotes cooperative conservation, with an emphasis on appropriate inclusion of local participation in Federal decision-making, in accordance with their respective agency mission, policies and regulations." We found no reference to this Order, or the phrase "cooperative collaboration" in the Draft WOPR. Frankly, we found it unsatisfactory that the word 'collaboration' was only used in the Draft WOPR in the context of cooperating agencies, or in dealing with OHV use.

Title 1, Congressional Declaration of National Environmental Policy Sec. 101[42 USC § 4331] subsection (c) states, "The Congress recognizes that each person should enjoy a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment." The second priority in the Bureau of Land Management's Vision, Mission, Values and Priorities statement clearly

addresses community involvement as a priority. In the recently-completed document entitled *"BLM Partners for a Purpose"* it states *"Purpose – To develop and implement a strategy for enhancing the Bureau of Land Management (BLM) capacity to manage public lands and deliver services for the American people. Given our current challenges and the proven success of effective partnerships, Oregon/Washington will seek and strategically utilize partners and volunteers."* We suggest that working with the Applegate Partnership is an excellent opportunity to achieve these goals in the Applegate Watershed.

And finally, in 2002 Interior Secretary Gale A. Norton expounded upon the "4 Cs" – "Consultation, Cooperation and Communication all in the name of Conservation." Again on September 7, 2005, she noted in her *Public Lands USA: Use, Share, Appreciate Cooperating to Conserve the Nation's Resources* statement, "I believe that handshakes of agreement produce far better results than heavy-handed mandates. The President and I want you (the public) to be involved with the process of conservation. We will continue to empower you when you do." While there is no mention of these concepts in the Draft WOPR, the Applegate's collaborative land management has put these words on the ground time and time again. In requesting the BLM to acknowledge the Applegate as unique, *we are asking you, the BLM, to be as involved in the process of cooperative conservation as we in the Applegate are.*

2.0 The Klamath-Siskiyou Province[1]

The Klamath–Siskiyou Province is unique and different from most of the O & C lands and this diversity must be acknowledged in the BLM chosen WOPR alternative; to not do so would be ecologically (and therefore economically) irresponsible.

Agency personnel and southwest Oregon locals have known for some time that southwest Oregon with its Mediterranean climate and unusually diverse and aged geology does not well respond to harvest strategies developed and used in adjacent ecosystems in the temperate ecosystems to the north. Together we have traditionally coupled professional expertise and local experience to collaborate and adapt state of the art science and modeling for the benefit of the ecosystems and local communities.

The Applegate Watershed, a microcosm of southwest Oregon diversity, hosts Port-Orford-cedar and tanoak on its west edge, representatives of the coastal marine influence. In contrast, a variety of true oaks and pines thrive on the eastern extremes and on low elevation shallow soils and sometimes ultrabasically influenced soils where they are competitively dominant, and surprisingly productive. The combinations of climatic influences provides varied habitat that is subject to all classes of fire regimes.

Consequently, the Applegate has enjoyed, along with the Siskiyous, the reputation of being one of the most floristically diverse watersheds in the world, particularly with reference to its conifers. The residents take pride in its diversity and beauty as well as their long-time involvement in the stewardship of its sustainability and resilience. We jointly agree that achieving a major goal of the WOPR, healthy social and economic communities, depends on maintaining healthy and viable ecosystems.

Less commonly known is that southwestern Oregon has been, until recently, comparatively free of insect and disease epidemics. Conventional wisdom and several

[1] Much of this section is from testimony by Thomas Atzet, Ph.D., in a Congressional Hearing by the Forests and Forest Health Subcommittee and the Committee on Resources, Feb. 14, 2006, Medford, OR.

scientific studies theorize that both species diversity and frequent fire has been instrumental in prevention. The fact that fire is so frequent and universal indicates that the system is both productive and resilient. Fire needs fuel to burn; our ecosystems are capable of rapidly and repeatedly producing fuel, including a variety of sprouting hardwoods and shrubs, to assure the ecosystem is judiciously reset and sanitized. Ours is a dynamic system that evolved with frequent and sometimes intense disturbance; a high degree of protection is likely to be counterproductive to resilience, resistance, long-term health and natural selection. As such, it is a prime candidate for active management. It is probable that trying to protect the system from fire may be more costly and environmentally unsound than working with nature to incorporate frequent disturbance and renewal through mortality, growth and regeneration.

In addition to the exclusive conifers of the Klamath-Siskiyou Province, there is also a complement of rare plants and animals. Rarity is always prized. And although active management is indicated, caution and deliberation is needed to assure maintaining the viability of the rare. This is why our partnership with the agencies and universities has been so fruitful and critical. Traditional strategies, tools and applications have been put under the imaginative eye of experimentation and adaptation. This partnership and integration has been well accepted and can continue to be a social and ecological asset. The objective has been to nurture creativity, involve the community and keep the decisions out of the courts. *Applegate citizens have been active players; sitting on the bench is not an option.*

Another conspicuously absent piece in the Draft WOPR is the issue of global climate change. The BLM is aware of this issue and will undoubtedly rectify this shortcoming in the final version of the WOPR, but we would point out that it is imperative that changing climate be factored into the management of all forested landscapes, particularly in transition zones similar to southwest Oregon's fire adapted ecosystems. Global climate change begs for rigorous analysis and the Applegate's proposal should be acknowledged as a process that at least moves us in the right direction for long term sustainability of unique landscapes under increased climate change stresses.

The Applegate Partnership recognizes the timber management mandate of the 1937 O & C Act. We expect the BLM to harvest timber on Applegate O&C lands, but not at the expense of our bio-diversity, quality of life, and not such that fire resiliency is lost. Plantation-like, even aged management is inappropriate in the Applegate; it fosters fire prone forests, spreads noxious weed and fosters degradation of our biologically diverse ecosystems.

We would like to close on this issue with the sage words spoken by Abraham Lincoln in the 1800's that apply equally well to today's issues, "You cannot escape the responsibility of tomorrow by evading it today."

3.0 Historical Recognition of the Applegate

We would again like to provide our social/community component background, to give context to the proposal that we submitted to you in October, 2005. The Applegate Partnership began in 1992, and since then has received state, national and international recognition for our collaborative land management work.

We have hosted the Secretary and Under Secretaries of the Departments of Interior and Agriculture, numerous agency dignitaries from Washington DC, Governors,

Congressmen, Senators, international leaders, foundations, environmental organizations, timber industries, media representatives, universities and many individuals and/or organizations from around the country. We have hosted visiting leaders from China, Bosnia, France, Germany, Russia, Japan, Mexico, Chile, Argentina and Brazil. They *all* came to the Applegate to more closely study our community collaborative process in action.

We have been invited to meet with two Presidents (one Republican and one Democrat), three Chief's of the Forest Service and two BLM Directors. We've attended two planning sessions in the administrative wing of the White House, testified before Congress on numerous occasions, and participated in many administration and agency presentations in Washington DC. The Applegate Partnership's leadership of Jack Shipley was recognized during the United States Forest Service's Centennial Celebration, with the first-ever *National Community Leadership Award.* During Oregon's 150 Year Celebration, *The Oregonian* newspaper recognized Jack as one of 150 "Luminaries" in Oregon's history for work accomplished by the Applegate Partnership.

Our environmental partners abandoned us during the years when the Democrats occupied the White House, and our timber industry partners abandoned us during the years the Republicans occupied the White House. This political "on again, off again" participation by the "communities of interest" illustrates how fickle special interest groups are, based on which way the "wind is blowing" inside the Beltway.

This inconsistent behavior by special interest groups is a compelling reason for land management agencies to recognize and embrace "communities of place" (like the Applegate Partnership) who desire the consistency and continuity necessary for quality natural resource management on public lands in and around their communities.

The Applegate Partnership, through the Applegate River Watershed Council, has been recognized for its stellar work on natural resource restoration projects both on public and private lands to the tune of somewhere between $500,000 and $750,000 annually since 1995. And, through the efforts of the Applegate Fire Plan, more than $1.3 million in grant funding has come into the Rogue Valley for hazardous fuels mitigation and fire prevention. This, and our successful restoration and monitoring program illustrates that "we perform", and are not just talking out of our hat.

It should be noted that the Applegate Partnership is a volunteer Board and all travel expenses for our public involvement are paid by the participating members and not out of some organizational travel fund.

In Closing

There has been ample recognition that partnering plays an important role in public resource management. The notations above are compelling statements that illustrate the need for federal agencies to embrace public involvement, but the absence of reference to them within the Draft WOPR is disturbing. We feel the WOPR *is* the appropriate place to put into action the community involvement component that the agencies have espoused time and time again.

The Applegate Partnership and it's involvement with local federal agencies in the Applegate AMA has been a stellar example of a community attempting to participate in

the civic discourse as identified by NEPA, the Secretary of the Interior and the agency priority statement. We feel it is imperative that the special nature of the Applegate Watershed and desired collaboration by the Applegate Partnership be acknowledged in the WOPR as having special geological, ecological and social significance, and that the detailed *designation* of such will be developed between the Applegate Partnership and the District Manager when the Medford RMP is developed. *Additionally, we request this be done before the local District managers and Resource Area managers move on to other positions.*

Thank you for the opportunity to comment on the Draft Western Oregon Plan Revision. We eagerly await your proactive response to our input and request.

Respectfully submitted,

Jack Shipley, Chair
Applegate Partnership Board of Directors
6941 Upper Applegate Road
Jacksonville, OR 97530

CC: Tim Reuwsaat, Medford District Manager
Dirk Kempthorne, Secretary of the Interior
Jim Caswell, Director, BLM
John Gerritsma, Ashland Resource Area Manager
Abbie Jossie, Grants Pass Resource Area Manager
Scott Conroy, Rogue River-Siskiyou NF Supervisor
Senator Ron Wyden
Senator Gordon Smith
Congressman Greg Walden

Attch: Addendum A