

Recommendations to the Jackson County Board of Commissioners (BOC)
on
The BLM's Western Oregon Plan Revision (WOPR)

INTRODUCTION

The Forest Management Subcommittee of the Natural Resources Advisory Committee (NRAC) is aware of the results of an effort supported by the NRAC to provide the BOC with recommendations on what feedback to provide the BLM on its Draft Environmental Impact Statement (DEIS) on the WOPR. This subcommittee of the NRAC has traditionally been the principle provider of recommendations regarding forestry matters of concern to the BOC. While acknowledging that the recommendations requested by the BOC from a created "Core Group" provided it a broad spectrum of opinions about the DEIS, this subcommittee believes that the BOC should also entertain information of a more focused kind that reflects the opinions of those particularly well versed in certain parts of the WOPR.

The Forest Management Subcommittee of the NRAC is composed of 5 members: Two retired professional foresters (one of whom owns and manages a small woodland property), one member, a working "professional" forester who has extensive experience in the field, one small woodland owner, and one person well versed in water quality, riparian and fisheries matters. These five members met and discussed specific recommendations that are being forwarded to the general membership of the NRAC for submission to the BOC as additional input.

We stress that this is **additional** input and is not meant to contradict or contest other input that the BOC may receive.

The BOC expressed interest in five major subjects in regard to the WOPR: **Wildfire Timber Management, Socio-Economics, Wildlife and Water.**

The Forest Management Subcommittee will comment on these same subjects and in addition will comment on the WOPR's relation to the O&C Act of 1937.

COMMENTS OF THE SUBCOMMITTEE

This subcommittee supports, and has no additions to the "Statements" contained in the Core Group's submission to the BOC with regard to **Wildfire.**

On **Timber Management** the subcommittee offers the following: Although the WOPR recognizes the uniqueness of the forests of most of the Medford District by applying different harvest methods to timber stands south of a line thru Grants Pass, most reviewers were not convinced that there is enough explanation in the DEIS as to how the harvest methods will differ. This subcommittee does not disagree with any of the statements on this subject from the Core Group. **We recommend that the BLM more fully describe how it would recognize that more partial cutting, selective cutting and thinning be done on Medford District forests, and generally, in what places; and analyze the effects on the condition of the forests and the Allowable Sale Quantity (ASQ). If that, in essence has already been done, then it needs to be better displayed.**

None of the alternatives provides information on the relationship between forest productivity (growth per acre per year) and the ASQ. Based on information obtained from a BLM specialist well versed in growth and yield on the Medford District, alternative 2. still does not harvest all the growth occurring there. (Alternative 2. produces the highest ASQ of all the alternatives). The O&C Act says that timber harvest should be based on the principle of sustained yield. Producing more fiber than is harvested leads to build up of biomass, which leads to high fire hazard, which leads to increased fires and loss of timber and habitat, and as a result, also a loss of wildlife and decrease in water quality. This can cause a net loss to human society as well as the natural environment.

This subcommittee recommends that the BLM more fully describe the relationship between the growth of harvestable timber (especially on the Medford District) and its actual planned harvest under the various alternatives.

The definition of “harvestable timber” for our purposes, and based on Medford District data, is the forested acreage in the District. By multiplying the forested acres, 788,000 X 300 board feet/acre/year = 236.40 million board feet per year. Harvest in alternative 2. = 131.0 million board feet per year, far under the sustained yield of these lands.

The subject of Socio-economics in this presentation is dealt with in relation to adherence to the O&C Act. The Core Group statements on this subject have been treated by this subcommittee under Timber Management above. The O&C Act determined that “forest production” would be dominant in managing the O&C forests. This has been upheld in a court decision. The O&C Act included “providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries...” (underlining added). (A pertinent discussion of this subject is contained in the “Critical Commentary” of the Josephine County Report of the Select Sub-Committee regarding the WOPR on page 9 of that report. The report is in the hands of the Jackson County BOC, and they are able to refer to it.)

It should be noted that even under the highest ASQ level alternative, (Alternative 2.) only 54% of the BLM land base is available for harvest.

We recommend that the BLM explain its reliance on Alternative 3. to comply with the “out of court settlement”, when long rotations in that plan restrict timber growth, timber harvest and revenues to the Counties. This may be a subject where the BLM can deviate from the preferred alternative to achieve a higher level of harvest and revenues by including more acres in the forested land base.

Wildlife

This subcommittee, which is focused on forest management issues, has no specific concerns with the DEIS on wildlife issues. None of the alternatives seems to have a detrimental effect on Wildlife in general. We offer no comment on this subject. The statements from the Core Group cover any concerns we may have.

Water issues in the DEIS are not of significant concern to this subcommittee. The Core Group stated that the riparian buffers should be determined on a site-specific basis. The DEIS indicates a formulaic approach. This may be due to the difficulty of incorporating

in the plan an analysis that reflects site specifics. Although possible to do, it may not be cost effective to do so for planning purposes. If this is so, it would be helpful for BLM to so state in the DEIS.

Note: This same difficulty might be the reason the BLM apparently did not model a partial cut/selective cut analysis for timber management in the Medford District. It would be instructive to find that out from the BLM when it responds to input.

We agree with the Core Group recommendations.

Summary

It is hoped that the BOC will value the perspective of a more focused group whose membership is heavily weighted toward a professional approach to the subject. This group, the Forest Management Subcommittee, is part of the (NRAC) that is an official advisor to the BOC. Those professionals have spent their careers considering the very questions raised by the WOPR DEIS and have observed the results of various management actions on the ground. The other members, who are not “professional foresters” also have on the ground experience that is a cut above the perceptions on natural resource issues of the general public. It is in that spirit that we submit our recommendations to the NRAC for further submission to the BOC.