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OREGON SOCIETY OF AMERICAN FORESTERS

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January 8, 2008

Mr. Ed Shepard, State Director
USDI Bureau of Land Management
Western Oregon Plan Revisions
P.O. Box 2965
Portland Oregon 97208

Dear Mr. Shepard:

The Executive Committee of the Oregon Society of American Foresters (OSAF), which provides leadership for over 1000 member forestry professionals in the state, is pleased to comment on the BLM's Draft Environmental Impact Statement (DEIS) for the revision of the Resource Management Plans of the Western Oregon Districts (WOPR) that was released on August 10. OSAF provides a unique and vital voice for Oregon's community of forestry professionals, who are sometimes overlooked by agencies and decision makers as a key stakeholder group in major forest issues, policies and management planning (OSAF 2005a).

Based on our substantial professional expertise and experience, OSAF strongly supports active management of Oregon's forests to meet the diverse objectives of land owners and managers. Federal, state and local laws provide management direction for our public forest lands. The foundation and primary objectives for managing most of the BLM lands in Western Oregon are found in the O&C Act of 1937, with due consideration of more recent laws and guidelines that address environmental and other concerns. As an objectives-oriented profession (Adams 2007), and consistent with the mandate of key laws such as the O&C Act, OSAF has formally endorsed commercial timber harvesting as "an appropriate objective and primary tool for healthy, sustainable forests on public lands in Oregon" (OSAF 2007).

The timing of the proposed revisions of the Resource Management Plans is critical given the expiration of the Secure Rural Schools and Community Self-Determination Act (SRSCA) of 2000. This law directed over \$100 million annually in federal payments to western Oregon counties with BLM forestlands, as a substitute for timber revenues mandated under the O&C Act, after the Northwest Forest Plan (NWFP) adopted in the 1990s led to a great reduction in active management of these and other federal forests. Although those payments have been temporarily extended, current policies are inadequate in providing long-term benefits and consistency for both local communities and forest management by the BLM.

The recent development of the WOPR is important also because over a decade has passed since both the NWFP and the prior management plans were developed and adopted. The SAF emphasizes that "sound science is the foundation of

forestry" and as an organization it pointedly strives "to advance the science, education, technology, and practice of forestry" (www.safnet.org/who/whoweare.cfm). The scope and complexity of the resource management concerns for BLM and other public forest lands demands that current research, technical knowledge, and analytical tools be applied to management planning on a regular basis.

Of the proposals presented in the DEIS, we believe that Alternative 2 provides the best means for meeting BLM's unique mandate under the O&C Act while also addressing key resource conservation and protection concerns. Importantly, Alternative 2 emphasizes active forest management as the primary means for generating federal revenues for counties at levels comparable to the SRSCA payments. Moreover, it would do so by generating economic benefits and useful renewable resources from the productivity of the land itself, rather than a reliance on federal taxpayers.

In addition to our general support for Alternative 2, we offer the following comments on several major forest management issues that we believe are relevant and important in the development of the final EIS and Decision for the WOPR:

Mature & Old-growth Forests & Wildlife Habitat

The preferred alternative would establish Late-Successional Management Areas (LSMAs) on 19% of the BLM planning area and allow treatment of these areas to promote or speed their development toward late-successional forest habitat. Riparian Management Areas (6% of planning area) and Administratively and Congressionally Withdrawn areas (e.g. Wild & Scenic, National Monuments, Recreation Areas) would contribute additional substantial acreage of complex forests. Over the 100-year projection period, "structurally complex" forest conditions are expected to increase from the current 25% to 33% of the planning area. Furthermore, "mature forest" conditions are projected to increase to 32% over the 100-year period under Alternative 2. Taken together, mature and structurally complex forests eventually would be the most common forest condition expected over the planning area.

In drier forest types within the WOPR planning region, thinning to reduce fuels and the risk of wildfire and promote older, larger, fire-resistant trees is appropriate and urgently needed in some areas. Also, although current critical habitat designations by the U.S. Fish & Wildlife Service may change, the preferred alternative would retain Critical Habitat Units (CHUs) for the marbled murrelet and spotted owl. These CHUs would be partially matched with the LSMAs and the acreage of the CHUs is expected to increase over time. Within the applicable constraints for such land management units, the OSAF supports the active management of mature and old-growth forests to promote and sustain ecological diversity and other values (OSAF 2005b).

Water Resource Protection

The preferred alternative proposes 100-foot riparian management areas (RMAs) for all perennial streams, with a 25-foot no-harvest inner zone and harvest restricted by canopy/shade requirements in the outer 25-100-foot zone. Lower retention of trees and other vegetation would be required along intermittent streams. Such RMAs are less than the preliminary (i.e., "default," pre-watershed analysis) RMAs under the Aquatic Conservation

Strategy (ACS) of the NWFP, but effectively greater than those required under Oregon's Forest Practice Rules, the latter which federal agencies have agreed to meet or exceed. When combined with the numerous Best Management Practices (BMPs) described in the DEIS (Appendix I), the preferred alternative is expected to maintain water quality and quantity.

The NWFP and its ACS were developed with a pointed focus on landscape-level processes and objectives, as well as with allowances for active management to meet resource objectives. Although somewhat different and generally less conservative than the ACS, the proposed RMAs and BMPs in the preferred alternative reflect consideration of both landscape and site-specific conditions and processes, with positive implications for water resource protection. In addition, there is little evidence that very wide, unmanaged buffers (ACS default) are needed for such protection, and newer research and experience suggest that such buffers may limit aquatic productivity due to low sunlight inputs while also increasing risks of long-term watershed impacts due to uncharacteristically severe wildfire. These observations support OSAF's view that, "... in some locations, forest thinnings and other active management of riparian areas could reduce natural risks (e.g., severe wildfires) or accelerate desired improvements in streamside conditions and fish habitat" (OSAF 2005c).

Silvicultural Prescriptions and Harvest Systems

The forests of western Oregon are much more diverse and complex than is commonly recognized, and the BLM must use an array of management and harvest systems to meet the challenging goals reflected in the WOPR. Forestry professionals understand the need for different silvicultural prescriptions to address a range of management objectives, forest types, site conditions, and other factors. OSAF thus supports the BLM's use of variable density thinning as well as clearcut (also called regeneration harvest) prescriptions in its implementation plans. No single prescription can meet all management objectives for the range of sites and forest types found on BLM lands. Variable density thinning can promote complex forest structure and associated wildlife habitat, but it also requires more complex harvest systems that often result in higher costs and lower timber outputs.

Concerns about wildlife in mature and old-growth forests can overshadow the fact that clearcut harvests provide habitat for other important western Oregon species, while efficiently producing high timber volumes and readily establishing shade-intolerant forest species such as Douglas-fir (OSAF 2003c). The OSAF supports the availability and consideration of all well-proven silvicultural prescriptions and harvest systems to meet the WOPR objectives over the wide range of conditions found on BLM lands. Given the O&C Act mandate for economic benefits, it is also essential that BLM conduct analyses of its prescriptions and practices to promote efficient silviculture and harvesting to help maximize returns to local counties as well as the federal treasury.

Forest Health & Wildfire Hazards

Decades of experience have shown that forests are neither static when left alone nor irreplaceable when greatly altered by either natural or human influences. They are dynamic with a natural cycle of birth, growth, deterioration, and death, like all living things. The nature and likely outcomes of the BLM's preferred alternative are consistent with OSAF's view that: "Oregon's forests are resilient and dynamic, and disturbances play

an important role in maintaining their health and unique attributes. However, passive management that relies primarily on natural disturbance entails serious risks to the wide range of continuous benefits that Oregonians [expect] from their forests, from wildlife habitat to wood products to recreation opportunities. These benefits [often] can be best achieved and sustained through active management [to promote] healthy forests. Although active management can have some short-term impacts and cannot eliminate all forest health or wildfire hazards, a substantial and growing body of research and professional experience shows that it can produce much more reliable and positive results than a passive management approach" (OSAF 2003a).

Salvage Harvesting

The preferred alternative includes provisions for salvage harvest for economic purposes after catastrophic events such as wildfire. OSAF "supports the well planned, timely, and careful use of salvage harvesting...[which] can mitigate economic losses..., recover useful wood products, reduce fire and safety hazards and create the desired environmental conditions for successful reforestation" (OSAF 2003b). Given the extent of high wildfire hazards in areas such as southwest Oregon, it is appropriate that the WOPR integrate preliminary plans and guidelines for salvage harvest. The economic focus of the O&C Act also emphasizes the need for rapid salvage to maintain forest product values, which can be enhanced by such advance plans and guidelines, as well as "...an efficient public review and appeal process [that] allows both adequate opportunities for constructive public input as well as timely implementation of approved plans" (OSAF 2003b).

Operational Costs & Feasibility

To accomplish the management objectives of the preferred alternative, specific timber sale programs and plans will be a major tool for the BLM. Forestry professionals know from experience that the requirements in federal timber sale contracts have become increasingly expansive and complicated, making it difficult for purchasers to complete projects and do so in an economical manner. Management objectives will not be accomplished consistently if BLM timber sales become so complex that few or no purchasers bid on them. It is therefore critical to the success of the WOPR that the timber sale programs and plans be carefully developed and tested for operational and economic feasibility. This is particularly important where timber volumes per acre are low and operational requirements are high. We believe that BLM should seek professional input from outside the agency to help conduct such feasibility analyses and testing.

I hope that these few comments are helpful as you consider a final decision on the WOPR DEIS. Please do not hesitate to contact me or OSAF via www.forestry.org if you have any questions or other needs related to this input.

For the OSAF Executive Committee,

Marc Vomocil, Chair
Oregon Society of American Foresters

Attachments: OSAF. 2005a. Forestry professionals: a key stakeholder group.

Adams, P.W. 2007. Forestry: an objectives-oriented profession.

OSAF Position Statements

(2003a)

Active Management to Achieve & Maintain Healthy Forests

Commercial Timber Harvest on Public Lands in Oregon (2007)

Managing Mature & Old-growth Forests (2005b)

Riparian Forest Management and Fish (2005c)

Salvage Harvesting (2003b)

Clearcutting (2003c)

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forestry to benefit society.*

