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January 9, 2008

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

Dear Ed,

I would like to take this final opportunity to address some specific southern Oregon issues that I think are pertinent to the development of the Western Oregon Plan Revision (WOPR) and specifically to the development of the Medford District portion of the plan.

For the other readers of this letter who do not know my background and qualifications to address these issues I give the following brief background. I worked on the Medford district from 1973 to 2004. I spent over 20 of those years working in the area that is currently referred to as the Ashland Resource Area. My main responsibilities were supervision and oversight of the Forest Management and Forest Engineering programs. I spent 15 years of my career on the ground as a field forester and the rest of the time I was forest management program manager. I participated in the development and successful completion of some of the largest and most complex salvage and thinning programs developed from 1989 thru 2004.

In your letter of August 2007 you asked for specific recommendations on "How to increase the fire resiliency of the forests in the Medford District and the Klamath Falls Resource Areas of the Lakeview District". I give you the following recommendations based on my experience on the southern portion of the Medford District but I believe that, in general, they apply throughout the Grants Pass, Ashland, Butte Falls and Klamath Resource areas.

1. The success of our early (1993 – 2000) Ashland Resource Area thinning program was based on the economic viability of the projects. To accomplish this, sales were carefully designed to maximize efficiency. Several factors affect this:

- a. The primary factor in accomplishing this is to go large scale in the area (5000 acres+) of the projects offered and to minimize the areas not treated within the project area. The larger the project in volume removed the higher the probability of receiving competitive bids and thus maximizing the return to the government.
- b. The silvicultural prescriptions focused on removing the smaller trees (6" – 18" dbh) but were not restricted by diameter limits. I do not believe there is any scientific reason for a diameter limit and there is often a need to thin/remove larger trees for salvage or stand density management. These larger trees vastly improved the economic viability of the timber sales.

c. We focused on maintaining operational feasibility at all times and were careful to not require complex operational techniques when other less complex systems could be used. This often requires some degree of trade-off and risk management but without maintaining economical operational procedures a project will fail. A simple example of NOT doing this would be to require an area to be helicopter logged in an area with existing roads that could be conventionally logged from.

2. Innovative timber sale preparation techniques when working on sales that cover large areas is required. The labor force and time required to mark these sales is important to keep in mind; they are not cheap to prepare. Therefore, it is imperative that the BLM take a close look at their preparation procedures. Many suggestions have been offered in the past, like purchaser selection of the trees, contracting out marking projects to private contractors, scaling timber or pooling all markers for the district into one pool: there are many other possibilities out there. However, there were always many barriers to trying these things out. An experienced team should review ALL suggestions and BLM management should make it possible to increase the Medford Districts authorization to experiment. There are lots of good reasons to NOT loose control of this work but the scale of these projects requires more innovation and risk taking.

3. Innovative timber sale contracting and administration techniques are required. We were allowed to try purchaser logging plan requirements and they worked very well. Not only did they give "ownership" to the purchaser for the problems that arose but they also allowed the purchaser to share in the success of projects. Without scaling requirements in the Applegate salvage sales (1988 – 1994) over 50 MMBF would have remained unharvested.

*I need to point out that there are LOTS of risks involved in #2 and #3 above and these risks can often be brought forward as the reason to NOT do them. However, these risks can be managed and supervised by your experienced forest administrators. It is important for management to understand that because of these risks some problems will arise and to accept them as part of the process. At the same time, many of the standard contract requirements that were used were developed after YEARS of experience and should be carefully evaluated when changing.*

4. If you are going to return to a larger timber sale program in the Medford District AND you are going to put large, complex thinning sales across the landscape it is imperative that the area teams are supportive and buy into the program. During the implementation of the Northwest Forest Plan, as time passed, the understanding of what we were suppose to do became so complex that we were unable achieve economic viability. There were two primary reasons for this failure in my opinion;

a. Upper management was not involved enough at the ground level. Either thru inexperience with the operational complexities of the program or thru a crushing schedule of dealing with problems that have nothing to do with project implementation, oversight and direction to keep teams focused on the GOAL was often lacking. If teams do not have strong management focus as to accomplishing the task in a rapid and economic manner then the tendency is for them to delay.

b. Team specialists would get "single issue oriented". A few examples of this would be wildlife specialists for wildlife, soils specialists for minimal ground impact, silvicultural specialists for maximum forest treatments. This is not to find fault with these specialists; it is their job to maximize the benefits to a resource, however, the spirit of compromise can get lost if the goal is not kept in mind. If the BLM's plan adopts a goal of wildlife management as the primary goal then it would be the job of the forester to maximize the return to wildlife; if however, the plan adopts a thinning for fire resiliency goal then it is the job of the team to maximize this goal.

5. In the development of the final WOPR it is imperative that the BLM apply some very stringent and meaningful economic analysis to what is being asked of the ground personnel. Early in the implementation of the Northwest Forest Plan it was often discussed at the ground level how economically impossible some of what was being asked would be to implement. As time passed this became more apparent and eventually caused the failure of many projects. Even though the personnel putting the projects together kept warning of failure due to economic factors we kept pushing forward with more and more restricting requirements that eventually hindered the economic viability of the projects. If you are to have long term success with whatever plan is adopted in the final form it must be economically feasible and implementable.

Please remind your team that if the final WOPR can not be accomplished at the ground level due to its overbearing complexity and requirements then NOTHING has been accomplished and all the time in preparing the plan will be wasted. A timber sale that does not get sold is worthless to every objective in the plan except possibly the requirement to offer timber (this old school thought should actually be abolished – a sale not sold means failure at the design level). Likewise a PLAN that can't be physically accomplished is no plan at all and the accountability for that failure rests at the design level.

Thank you for this opportunity to comment on the Western Oregon Plan Revision. I hope that thru the implementation of the new plan the BLM can return to some semblance of a balanced forest management program in southern Oregon that provides economic return to both the counties and the government, jobs for local citizens, and in my opinion, most importantly, a resolution to a rapidly declining forest health issue in southern Oregon forests.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Armitage", with a stylized flourish at the end.

Steve Armitage