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Bureau of Land Management  
Oregon/Washington State Office  
ATTN: Western Oregon Planning Revision (OR930.1)  
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The following comments regarding the Western Oregon Planning Revision are submitted by Oregon-Washington Partners in Flight. The BLM has been an active participant in Partners in Flight (PIF) at both the regional and national levels since its inception in 1990, in response to concerns over declines in many common landbird populations. In line with this participation, the analysis in the Draft Environmental Impact Statement for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management Districts (DEIS) alternatives with respect to PIF bird conservation plans represents the BLM's commitment to using the best available science in the DEIS. We are very pleased to see the analysis, as well as specific PIF bird conservation objectives for both eastside coniferous forest and westside coniferous forest included in the plan.

We recommend that, in addition to this consideration, landbird monitoring tools be used to fulfill ecosystem management effectiveness monitoring objectives that are at the core of the adaptive management framework as suggested in the Klamath Bird Observatory's letter dated March 17, 2007. This will not only fulfill mandates to monitor the effectiveness of management with regards to achieving desired ecological conditions, it will help to identify opportunities to link priority bird conservation objectives with priority management projects (Alexander et al. 2007). This will address federal agency mandates to protect migratory birds, as required by the Migratory Bird Treaty Act (Federal Register 2001). In addition, we would like the BLM to consider the following five comments regarding the DEIS alternatives.

**Incorporation of relevant legislation**

In the section of Chapter 1 – Purpose and Need titled Major Laws Affecting Management of O&C Lands (Page 9 in DEIS) federal agency mandates to protect migratory birds, as required by the Migratory Bird Treaty Act and articulated in Executive Order 13186 (Federal Register 2001). It is our recommendation that a subsection be added to the Major Laws Affecting Management of O&C Lands regarding the Migratory Bird Treaty Act and related executive order.

**Non-quantified outcomes for hardwoods and riparian**

While we are very pleased to see the incorporation of the PIF conservation objectives and the analysis of alternatives for the eastside and westside coniferous forests, we are concerned about the lack of information on the impact of the DEIS on additional habitat types. Specifically, we feel the BLM should complete a similar analysis on the effect of both riparian and hardwood habitats. A more detailed letter on this subject was submitted to the BLM by Klamath Bird Observatory on February 27, 2006.

### **Eastside coniferous forest is not meeting PIF objectives**

One area of concern is the results of analyses that state “Under all alternatives, in the Klamath Falls Resource Area, BLM-administered lands would not meet the objective of “no net loss” (in reference to OR-WA Partners in Flight [OR-WA PIF] Bird Conservation Plan for Eastside Conifer Forests – Altman 2000) of habitat (page 703 in DEIS).

Although the OR-WA PIF objectives are non-regulatory, and the BLM is under no obligation to meet those objectives, the results of these analyses indicate a likely significant affect on populations of two BLM Special Status Animal Species associated with mature ponderosa pine forests, Lewis’s Woodpecker and White-headed Woodpecker.

Both species are on every agency/organization list of birds of concern for this region including the USFWS’s Birds of Conservation Concern and ODFW’s State Wildlife Action Plan Strategy Species. In a recent analyses of Christmas Bird Count and Breeding Bird Survey data for the Audubon/American Bird Conservancy 2007 Watch List, Lewis’s Woodpecker is among the highest ranked (i.e., greatest concern) non-listed landbird species in North America based on significantly declining trends in both data sets and high threats to their habitat.

The DEIS states that “mature or structurally complex forest habitat would decrease under all alternatives from over 80% of the habitat capable area to approximately 30% (i.e., a decline in habitat of 50%).” Both species are documented to occur on the Klamath Falls Resource Area (Appendix G), but in a few small, scattered populations (pers. obs.). Both species also have experienced local extirpations (see Birds of Oregon – Marshall et al. 2001 and the Birds of North America accounts for each species) in Oregon and elsewhere as habitat conditions change in an unsuitable manner. A 50% decline in habitat capable area for BLM Sensitive and otherwise very high priority species with existing small populations will undoubtedly result in significant population declines, but also likely result in local extirpations.

Because the scenario just described will occur under all alternatives, we suggest the BLM revise the actions that will result in the decrease of “mature or structurally complex forest” in the Klamath Falls Resource Area to maintain populations of these two BLM Sensitive Species. As proposed, the BLM actions will exacerbate the declining status of these species, and likely significantly move them further towards endangered species status. We would be glad to work with the BLM on revisions to resolve this issue.

### **Concerns regarding westside coniferous forest alternatives**

Because, in much of the analysis, Mature and Existing Structurally Complex forests are considered together it is hard to truly determine that, as stated on p.704 “under all alternatives the landbird conservation objectives for mature and structurally complex forest would be met on BLM-administered lands as shown on Figure 247” (in reference to OR-WA Partners in Flight [OR-WA PIF] Bird Conservation Plan for Landbirds in Coniferous Forests of Western Oregon and Washington.– Altman 1999). In addition, the conservation plan suggests that 30% of the landscape exist as old-growth and mature

forest conditions and our revised conservation plan will suggest that 40% of that be maintained as old-growth.

Figure 159 on p. 531 shows the percentage of current forested land ranging from around 25% to 35% in the Coast Range, East Cascade and Klamath Provinces, and below 45% in the West Cascades Province. To determine whether the alternatives meet these landbird conservation objectives the analyses should indicate the percentage of both landscape and land-base current and future conditions that fall into the Mature and Existing Structurally Complex conditions respectively. Without this information the precautionary principal would suggest that forest currently classified as Existing Structurally Complex not be harvested, as historically this forest type made up a greater percentage of the landscape than they do now, and it has yet to be demonstrated that the ecological integrity of such conditions can be re-created with existing management techniques. Also, without accounting for the inevitable loss of Mature and Existing Structurally Complex forests from wildfire, the projections in Figure 247 are unrealistically optimistic and when the effects of fire are accounted for it becomes questionable as to whether the bird conservation objectives would be truly be met under Alternatives 1-3. It is therefore our recommendation that less harvest be prescribed for Mature and Existing Structurally Complex forests.

#### **Importance of green tree and snag retention**

We agree with the statement made in chapter 4 (page 707) that “The No Action Alternative and Alternative 3 would create the best quality stand establishment and young forest habitat compared to Alternatives 1 and 2 because of the requirements to retain snags, and legacy trees.” We urge the BLM to consider green tree and snag retention as a critical element to minimizing detrimental affects of timber harvest for coniferous forest birds. Specifically, retention can provide critical habitat components (i.e. old, large trees and snags) as the forest regenerates benefiting species that require structurally complex forest and mature forest with multi-layered canopy (Table 202, page 706) as well as creating habitat for snag associated species during stand establishments (Table 202, page 706).

We urge you to consider these comments in the revision of the DEIS.

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