

Dear BLM Officials,

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I hope you will consider these comments even though they are late. I tried to send them on the Web on the 11th but was blocked by a file formatting issue. I emailed them to Asst Area Manager, John Gerritona at 12:15 AM on the 12th.

Thank You,
Paul Mangus

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To: BLM, WOPR COMMENTS AND RECOMMENDATIONS

1/11/08

From: Paul Kangas
NW Forest Resources Mgm't
1421 Ramada Ave.
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GENERAL COMMENTS:

1. Much could and should be analyzed and written about the implementation of the NWFP. What worked and what failed? From my point of view, which was considerable at the time of implementation, it tried to establish an idealistic scientific and administrative approach for management of public forests. Although the main thrust was to provide for the spotted owl, myriad other administrative and scientific goals and requirements were included (eg. Survey & Manage, WCS etc.). All of the new requirements were added to the existing laws and regulations (eg. NEPA, ESA etc.), which soon provided agencies many old and new opportunities to fail in information gathering, documentation, work force shortages or procedurally. There were a lot of successes in the Plan, particularly in watershed and terrestrial species information. However, something had to slip and it was timber outputs, which the NWFP aimed to correct but provided no means to ensure success, particularly since the NWFP was thought to dominate the mandates of the O & C act. It was easy for those wishing to challenge timber harvests and for the judiciary to rule against harvests since there was a smorgasbord of old and new failures from which to choose.
2. At the time the NWFP was implemented, the extent and importance of the fuels build-up in our forests was not fully understood, documented or publicized and corrective measures were not particularly a part of the plan. Since that time, the frequency, size and particularly the intensity of wildfires and their affects on the wildland-urban interface required us to place a new emphasis on the current state of our forests, their health and future, including the welfare of plants and animals whose existence depend on forest habitats.
3. The NWFP did not address global temperature increase but it is likely to become a gigantic concern for the loss of forest and habitat. The role that forests play in carbon sequestration and cycling also provides mankind an opportunity, possibly the best opportunity, to offset the net loss of carbon to the atmosphere through proper forest management practices. "Scientists at the National Center for Atmospheric Research (NCAR) and the University of Colorado-Boulder calculated that large fires in western and southeastern states can add as much carbon to the atmosphere in a few weeks as the states' entire motor vehicle traffic emits in a year." (Article published by the Society of American Foresters in "The Forestry Source", January 2008, Titled "Carbon Emissions Growing, Forest Sinks Losing Ground", citing a report titled, "As Forest Growth Slows, Less CO₂ Taken from Atmosphere". In the same article citing the Carbon Cycle Report published in November by the US Climate Change Science Program. "There are a lot of reasons for replenishing our forests and encouraging better agricultural practices" said

Ken Caldeira of the Carnegie Institution's Department of Global Ecology, one of the report's lead authors." The Society of American Foresters web site is www.safnet.org The Carbon Cycle Report is available at www.climate-science.gov

4. Forest improvement loses because the general public knows and understands little about the condition of the forest, how forests are being managed or for what purpose and what level of funding should come from forests to pay for public services like libraries. The level of their forest knowledge and understanding is evident with basic statements like, "trees must be replanted in harvest units": a standard practice mastered long ago by forest managers. Most of their knowledge is taken from public media which tends to cover the sensational and the controversial but may try to give a balanced view based on words from opposing viewpoints or short sound and video segments resulting in little broad based exchange of information which would allow understanding of the issues. As has always been the case in history, those with little knowledge and understanding on an issue are easily manipulated.

Improvement of western forests and related issues such as equitable county funding often lose at another level when elected congressional representatives of the western states are not able to sufficiently influence congress in passing legislation that would help with forest management or county funding issues. Sensational events such as the rise in catastrophic wildfires brought national attention, prompting temporary legislation to fund fuel reduction projects. County services tend to not be as sensational, thus--.

Forest improvement also loses significantly and is often squelched at the judicial level. Judges making decisions to enjoin or halt planning or harvest decisions seldom reach the level of weighing proposed plans or actions on their merits because the plans or actions, most often, cannot pass the complex documentation or procedural requirements ensconced in public land management legislation and regulations.

5. The WOPR does good job of addressing some of the things that were unrealistic with the NWFP and takes a more realistic approach to actively managing the forests and comes closer to meeting the requirements of the O & C Act. For instance, in 1995, the NWFP's width of certain riparian buffers was set well beyond the width that scientists were stating was needed for stream protection and woody recruitment. The WOPR provides some needed adjustments to stream buffers.

The WOPR provides a basis for starting to address the forest management issues associated with reducing the threat from wildfire, developing more resilient forests that could mitigate the affects of global climate change and providing for the needs of wildlife and water resources. There is insufficient time to start new process or plan revision to manage BLM's Western Oregon forests and resources. The current deteriorating state of the forest and the funding crisis in Western Oregon requires that a form of the WOPR be implemented as soon as possible. Considerable forest damage probably occurred from a recent windstorm in Western Oregon and is now being assessed on BLM and USFS lands.

RECOMMENDATIONS:

1. The Adaptive Management Area concept was one of the best features of the NWFP. I am not familiar with the success of implementing the AMAs in other BLM districts but Medford BLM's, Applegate Adaptive Management Area is a success. It was a success in its procedural administration and in what it accomplished in the forest, particularly in the BLM's Ashland Resource Area. The lessons learned and successes of the AMA's must be incorporated into WOPR action. Silvicultural harvest prescriptions that provided success in the AMA's need to be applied to similar forest stands.
2. Each BLM Resource Area needs to have the council of an advisory committee such as the Title II, RAC committees. The committees need to look at resource plans and field projects before and implementation and be advocates for successful projects done in the AMA's.
3. Site specific silvicultural prescriptions need to be developed for various forest types in each Resource Area with considerations for the development of future forests that provide some degree of resilience to catastrophic events and climate change. Maintain live and dead tree components and retain a mix of other naturally occurring species wherever possible, in quantities that will promote forest resilience and the desired future condition. Thinning forests should promote growth and fire safety and meet economic goals. Tree removals should be allowed to remove all age and size classes to produce residual stands that meet or approach desired future conditions.
4. The implementation of WOPR, alternative 2 should be a minimum goal to reverse the deteriorating state of the BLM forests and the expected affects of climate change. Since alternative 2 covers the management of only 50 % of the forests and the same current and future affects will impact the entire forest; it is recommended that the remaining 50% of the forest be managed according to the provisions of alternative 3.
5. My only comment on OHV use is that it cannot work well on checkerboard ownerships and is not friendly to the general public or to natural resources. It needs large areas of land with the right attributes, (ie. slopes, soils and space), to work.