



OREGON SOCIETY OF AMERICAN FORESTERS

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9 JUNE 2016

Neil Kornze, Director
Bureau of Land Management
Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Oregon BLM Proposed Resource Management Plan

Director Kornze:

Last year the Oregon Society of American Foresters (OSAF) submitted comments on the Draft Western Oregon Resource Management Plan/EIS (dated August 20, 2015). We are now commenting, in general, on the Proposed Resource Management Plan (PRMP) and Final Environmental Impact Statement (FEIS). These comments should not be interpreted as a formal protest of the PRMP and FEIS; instead we wish to restate a number of our key concerns in the hope that the Record of Decision (ROD) will address these important issues. These comments were developed by the OSAF Policy Committee and reviewed by the OSAF Executive Committee. We believe that they are consistent with the views of the 800+ forestry professionals who are OSAF members, given their strong endorsement of nine formal position statements (see <http://www.forestry.org/oregon/policy/position/>) that support our comments.

Our first concern addresses the managed land base. BLM lands in western Oregon are largely part of a managed “checkerboard” landscape. These BLM lands are loaded to a



large extent and substantial portions have experienced active management and harvest entries of various types over the past 80 years. Additionally adjacent private lands have been, and continue to be, intensively managed and have substantial effects on the character and management options for the overall landscape. The PRMP calls for approximately 80 percent of BLM lands to be in reserves. In the northern zone, young forests in the reserves may be managed but only until they are on a suitable trajectory towards an old forest condition. Older forests will not be managed. In the southern zone, reserve stands across a wide age spectrum may be managed for fire resilience albeit using a particularly “light touch”. We believe that the creation of such large and fixed reserves with greatly restricted management options fails to consider natural perturbations such as fire, wind, and forest pests/pathogen outbreaks; fails to effectively use the array of silvicultural tools available to expedite attainment of old and resilient forest conditions; and also fails to account for the effects of, and effects upon, adjacent private lands. Private landowners are particularly concerned about the effect of these extensive reserves upon the access to, and forest health of, their lands. Increased reserve acreage and reduced harvest levels will undoubtedly lead to reduced road maintenance and more road closures, which will result in increased suppression costs on Oregon Department of Forestry protected lands (state, private, and BLM lands) and more acres affected by wildfire.

Our second concern has to do with the prescriptiveness of the PRMP and the “precautionary principle”. Professional foresters *are trained in the science and technology* of forest resource management. Foresters are equipped with the *knowledge and tools* to manage diverse forests to meet societal needs and expectations. We only need to be given clear goals and priorities. The prescriptiveness of the PRMP not only fails to utilize the skills of your professionals, but also fails to recognize the diversity of the landscape. As one of our members says “all silviculture is local”. This plan uses a generally restrictive management approach in which *alternative, new and innovative* silvicultural strategies will be difficult to implement. The ability to adjust management prescriptions can be particularly important in creating forests which are resilient to climate change and other major influences. We submit that medium to large scale *experimentation* using *new* silvicultural methods, so critical to future management of these forests, will essentially be precluded under this plan. In tandem with this plan’s



prescriptiveness is its precautionary approach to resource management. It seems that silvicultural prescriptions with proven long term effectiveness have been rejected because of overblown concerns about short term impacts. A balance must be reached for the ability to implement what is known to be effective and the ability to apply new scientific information when necessary and where appropriate. This is what keeps forestry professionals and forestry evolving over time and conditions. In dynamic systems like forests, there will always be conditions requiring new knowledge and the flexibility to apply lessons learned.

This plan, like the Northwest Forest Plan (NWFP), places substantial restrictions on post-disaster salvage harvesting in reserves. We reject the anti-management philosophy that well planned salvage harvesting and silviculture invariably result in unacceptable impacts to the ecological integrity of a damaged forest. Most of the BLM lands, including reserves, have already been altered to some extent by past direct management or management of adjacent lands. We believe that if fixed reserves must exist, then active post-disaster management is appropriate in order to develop desired characteristics as quickly as possible. We are particularly concerned that proposed natural re-establishment of forests could be slow and difficult in a changing climate. Perhaps a better post-disaster strategy would be to allow harvest and other management of these damaged stands incorporated with reserve boundary adjustments to encompass nearby suitable lands. It is important to note that adjacent private land owners in this “checkerboard” landscape are particularly concerned about increased fire and pest risks to their forests due to adjacent untreated, damaged BLM lands.

Our final concern deals with the feasibility of implementing the PRMP. We note that while this plan dispenses with some complicating elements found in the NWFP (such as Key Watersheds, Adaptive Management Areas, Survey and Manage, and Regional Ecosystem Office oversight), it nevertheless has such a large volume of detailed, restrictive management direction and process that it will, like the NWFP, be highly susceptible to protest, appeal, and litigation. And, of course, project level consultation with USDI Fish and Wildlife Service and NOAA National Marine Fisheries Service will continue to be sources of conflict. We believe that much more effort needs to be given to strengthening local manager discretion.



Forestry professionals have a great stake in the outcome of this planning process because, to a large degree, it will be forestry professionals that are responsible for successfully implementing the plan to effectively achieve its desired outcomes and benefits. We appreciate the complexities of land use planning at this scale and the need to make trade-offs to meet overall objectives. We firmly believe that your decisions must be based on sound science and should give your professionals the flexibility to implement adaptive prescriptions according to conditions on the ground.

Thank you for considering our comments.

Sincerely,



Steve Pilkerton, CF PE PhD

Oregon SAF Chair 2016

cc:

Janice Schneider – USDI, Assistant Secretary for Land and Minerals Management

Theresa Hanley, Oregon BLM, Acting State Director

Oregon Governor Kate Brown

Oregon Senator Ron Wyden

Oregon Senator Jeff Merkley

Oregon Representative Suzanne Bonamici

Oregon Representative Greg Walden

Oregon Representative Earl Blumenaur

Oregon Representative Peter A. DeFazio

Oregon Representative Kurt Schrader

Oregon Governor – Natural Resources Office

