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Bureau of Land Management
R.M.P. Planning Criteria Team
March 28, 2014

Dear BLM RMP Planners:

Please accept these RMP planning criteria comments from Umpqua Watersheds, Inc.

Umpqua Watersheds, Inc. (UW), a 501 C3 non profit, would like to preface its planning comments with the following maxim concerning management of BLM forest lands in Western Oregon: *The measure of management success on public forest lands should be the number of acres restored to high ecological function rather than the quantity of board feet extracted therefrom.*

UW offers this axiom as a guiding principle primarily because of the widespread degrading of that very high ecological function (once the birthright of every Oregonian), over past decades, on the lands in question, public and private. Indeed, as is well known, the BLM lands are arranged, for the most part, in the infamous checker board pattern. From the Cascade Range west to the coast, slightly less than half of the forested landscape of the checkerboard is in private ownership. Given that geo-political fact and the many harmful impacts condoned by the outdated Oregon Forest Practices Act (OFPA) and too often visited upon those private forest holdings, it is UW's studied opinion that those clear cut, herbicide soaked, monoculture fiber farm lands make minimal ecological contribution to watershed health and, in fact, greatly degrade it.

This lack of environmental cooperation from the private sector extends to the maintenance and recovery of a wide variety of fauna and flora, including species listed under the ESA. Large clear cuts on steep, sensitive ground; the heavy aerial application of increasingly toxic herbicides, sometimes in unknown combinations with unknown environmental and health impacts, and the largely monoculture restocking of those clear cut watersheds, make conservation and restoration of federal forest holdings by federal agencies all the more critical. If the vast private industrial forest lands of Western Oregon were to make more reasonable and significant environmental contributions to the restoration of high ecological functioning and associated biodiversity on our watersheds, an increase in harvest levels on BLM lands would, very likely, face significantly reduced opposition from the conservation community. Presently, these private forest enterprises do not contribute much, ecology wise. Indeed, the private, industrial fiber farm plantations so much in evidence across the checkerboard no more qualify for the name “forest” than the millions of acres of GMO field corn in Iowa deserve to be called grassland prairies. The UW Board of Directors, speaking for its membership, feels that it is on solid policy ground when it recommends that the BLM RMP planning team, in its plan development efforts, fully take into account the several harmful impacts of clear cut logging across the vast area encompassed by the proposed plan for its future management.

BLM planners are surely aware that the notion of “gridlock” on its forest lands, so often bandied about in the press, etc., is little more than innuendo. The only gridlock on BLM and USFS lands in the recent past is a gridlock on clear cutting. The agency's own data shows significant quantities of timber being

extracted from the various districts by means of mostly non controversial commercial thinning. And, while some maintain that this source of quality logs is nearly exhausted, most knowledgeable sources see this resource extending from a minimum of ten years up to about thirty years, or more.

Further, UW feels strongly that, given the vast acreage of second growth plantations on BLM lands, experimental harvest models, such as Variable Retention Harvest (VRH), can most beneficially be sited on those stands rather than in more mature and, consequently, more controversial stands, eighty years and older. As proposed and implemented by the Department of the Interior, the VRH model was intended as experimental, with careful scientific monitoring of the success or failure of accomplishing its stated goals to be a key component. UW would dearly like to see that follow up monitoring accomplished and the resultant experience based knowledge derived from that monitoring fully absorbed and implemented on further trial stands before the VRH model sees any widespread scaling up.

Are the affected “O & C” counties facing revenue shortfalls since federal forest resource extraction has been, rightly, reduced? Yes. However, it must be noted and taken into account by RMP planners that other sources of county funding are available. To wit: the principal state tax once imposed on harvested trees (severance) no longer applies to private forest holdings over 5000 acres. Rather, inadequate property taxes have been substituted. Data supplied by the Oregon Department of Revenue shows income to the state derived from severance taxes imposed on private timber harvests declined from a high of nearly $34,000,000 in 2000, to near zero by 2009, continuing at that low level, down to the present day. Over the same period, property tax revenues on private timberland ranged from only approximately some $2,000,000 to about $4,000,000 per year. To quote Prince Hamlet's murdered father: “Oh, what a falling off there was!”

Further, the Oregon Department of Forestry shows that if Oregon taxed harvested trees at the same rate as neighboring Washington, it would have yielded about $40,000,000 in 2011 alone! This, while some insist that harvests from public forests, like those administered in Western Oregon by the BLM, must contribute several times more than harvests from comparable or better private forest lands or from property taxes on those same private forest lands, to fund local services. Rather than applying constant, clamorous pressure on federal agencies to “up the cut” so as to generate receipts for county governments, it is UW's considered opinion that county commissioners ought to petition the Oregon Legislature and Governor to begin the legislative process required to reinstate the severance taxes that were, until not so very long ago, imposed upon private industrial timber harvests, by means of the Privilege Tax. Our neighboring states do not give their highly profitable industrial timber industries such a sweetheart deal and neither should the people of Oregon. Admittedly, this is a state legislative, executive and administrative issue. However, it is widely and well known that county funding pressures, brought to bear upon BLM, are prime motivators in this planning process. Thus, what might otherwise be construed as purely local issues with purely local solutions, must, in fairness, be considered as valid context supporting alternatives that oppose greatly “upping the cut” on the BLM lands under discussion here.

Likewise, the provision of raw material to local mills is a valid consideration. In the same vein, the fact that vast quantities of raw logs, harvested from private holdings, are exported from North Bend and other Oregon ports, their owners paying very minimal and inadequate taxes on such harvests, while domestic mills and their workers go wanting, is a most important consideration for the RMP planners. The Oregon Legislature has, within its constitutional authority, the ability to structure renewed harvest taxes such that sales to domestic enterprises would be encouraged while logs for export would be, in effect, penalized. This would lower, by a good deal, the clamor for cheaper federal logs to supply

domestic mills, while also generating much needed and considerable state and local revenue.

UW feels strongly that RMP planners must include an alternative that emphasizes overall restoration of its forested holdings for the long term benefit of all of the citizens of Western Oregon and of the entire United States of America. Such an alternative could produce significant volumes of thinned logs, even a notable volume from careful VRH methods conducted in plantations younger than 80 years of age that might also include, where appropriate, greater retention percentages and smaller "clear cut" openings at particular sites.

Given that the OFPA allows riparian zone clear cut harvests on private forest lands within the checkerboard, in some cases, to within ten feet (in so-called "conversion blocks" encompassing as much as 500' of stream reach in a single block) of active fish bearing and salmonid spawning streams, while offering no buffer protections whatsoever to either non-fish bearing and intermittent, head waters streams, there should be no reduction in the very successful riparian reserves recommended by the ACS of the North West Forest Plan. That is, until significant and effective modifications to the riparian harvest rules of the OFPA are adopted and implemented, nor until the many tens of thousands of acres of already degraded riparian zones located on private forest holdings have had a reasonable time to recover from their having been previously and wantonly clear cut.

Further, none of these alternative components ought to be offered by planners as "trade offs." That is, ecological, recreation and even aesthetic considerations should not be held hostage to timber extraction volumes in the assembling and offering of management alternatives in the RMP.

From among the various components of the preliminary alternatives, offered by planners in recent publications, the following are those most favored, though not unequivocally endorsed by UW. For example, we would choose the riparian reserve paragraph from Alt. "D" as being the best of the four offered. That said, UW stands strongly behind the aforementioned caveat concerning the critical relationship between riparian buffers, such as they are, on private holdings now, and those currently applied to riparian zones on federal forest lands under the auspices of the NWFP, ACS.

Again, from among the four tentative alternatives, UW would choose the Large Block Forest Reserve component described in Alt. "A." That said, we also favor the future "expansion" aspect of the same section in Alt. "B".

Concerning the protection of older forests, the 120 year threshold recommended under Alt. "A" is a good beginning, in our opinion. However, greater consideration must be directed toward so-called "mature" stands (80 to 120 years). This recommendation relates directly to the above mentioned "expansion" provision contained in Alt. "B".

Timber management, as defined in Alt. "B", aligns most closely with UW's preferences. However, we suggest a strategy more tailored to meet site specific conditions. That is, using the VRH model, one site might favor a 20% retention plan, while another, more sensitive site might require a retention rate of from 30% to as much as 50% or more to achieve restoration goals. It seems to us that the BLM's highly qualified foresters, silvaculturists, horticultural and wildlife specialists, geologists, hydrologists, et al. ought to be allowed some latitude, following accustomed consultation (e.g. NEPA, etc.) with the interested public and the appropriate personnel of other pertinent agencies (e.g., USFWS, NMFS, etc.) to create management plans best suited to the ecological and restoration necessities of a given location. Likewise, UW favors increased use of the variable retention thinning (VRT) model when creating commercial thinning plans in plantations. Again, as stated above: for both VRH and VRT paradigms,

UW favors those activities when they are sited in former plantations, etc. under 80 years.

UW does not favor harvest activities in critical habitat for NSO and MAMU except where they can be credibly justified and scientifically sanctioned as being real improvements in habitat for those ESA listed species and not actually intended to maximize extraction quantities under the guise of habitat restoration or enhancement.

Given the increasing value to regional and local economies of recreation activities, and from the increasing desire of the tax paying general public for more and better recreational opportunities, UW greatly favors Recreation Alternative # 4, the Maximum Recreation Development and Management Alternative. We offer this endorsement with the general caveat that UW does not favor expansion of motorized, OHV roads or trails. Considering the very real and extensive damage already visited upon public lands by uncontrolled, illicit OHV use and the current constraints on BLM law enforcement capabilities, we cannot, at this time, endorse its expansion.

We at Umpqua Watersheds are aware that this planning process is still at the formative stage. It is our hope, however, that the RMP planners will infer, from these remarks, how strongly the UW Board of Directors, representing its diverse and active membership, subscribes to the guiding maxim stated at the beginning of these comments and, for emphasis, we reiterate here: *The measure of management success on public forest lands should be the number of acres restored to high ecological function rather than the quantity of board feet extracted therefrom.*

Sincerely,

Joseph Patrick Quinn
Conservation Chair, Umpqua Watersheds, Inc.