Report on Public Outreach Sessions

For the BUREAU OF LAND MANAGEMENT RESOURCE MANAGEMENT PLANS FOR WESTERN OREGON



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Prepared by DS Consulting, through Oregon Consensus





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BLM Public Outreach Sessions Revisions to Resource Management Plans for Western Oregon March 2014

Executive Summary Facilitators' Report

In March 2014, the U.S. Bureau of Land Management (BLM), with the assistance of Oregon Consensus, convened a series of public outreach sessions to connect with the public on BLM's planning process to revise its Resource Management Plans (RMPs) for Western Oregon. The Resource Management Plans (RMP) for Western Oregon will determine how the BLM-administered lands in western Oregon will be managed to further the recovery of threatened and endangered species, to provide for clean water, to restore fire-adapted ecosystems, to produce a sustained yield of timber products, and to provide for recreation opportunities.

There are approximately 2.5 million acres in western Oregon that are part of the BLMadministered public lands included in the RMPs for Western Oregon. These lands provide forest products, fish and wildlife habitat, and recreation opportunities. Unlike national forests, BLM western Oregon public lands are generally not large contiguous blocks. A "checkerboard" pattern of public land is what makes up the federal lands.

<u>Goals</u>

The goals of the public outreach sessions were to build public awareness about BLM's planning process and provide an opportunity for sharing information during the Public Comment period.

Process Design & Implementation

Sessions were held in each of the six western districts with two additional sessions for a total of eight events:

- Portland (3/3)
- Eugene (3/5)
- Salem (3/6)
- Roseburg (3/10)
- Coos Bay (3/11)
- Medford (3/12)

- Klamath Falls (3/13)
- Roseburg Elected Officials Invitation (3/17): statewide elected officials received a special 'joint invitation' from BLM, the Oregon Governor's Office, and the Association of Oregon and California Counties (AOCC)

Each session was facilitated by a team of professional mediators provided by Oregon Consensus. The sessions followed a similar format described below (Note: slight changes were made to the elected officials' session):

• <u>One-hour plenary</u>: The BLM RMP Project Manager and District Managers grounded people in BLM's planning process, the Purpose and Need and the initial preliminary alternatives. All of this was framed in relation to four topic areas about which the public had clarified, during the December 2013 outreach, it wanted to hear more:

- 1) species conservation, 2) riparian reserves, 3) timber management, and 4) recreation.
- <u>Two-hour small group "Wandering Stations"</u>: People received numbers upon their arrival at the session and were asked to join that numbered group at one of four 'topic stations', which correlated to the topic areas mentioned above. At the stations, they received an information overview and then were asked to respond to two questions:
 - Do you have any clarifying questions? and
 - Are there additional approaches that BLM should consider analyzing for this topic?

Groups spent 20-30 minutes at each of the four topic stations, and then rotated or 'wandered' to the next until they had been at each of the four stations. Each station had a professional mediator/facilitator who helped the groups stay focused and engaged. In addition, a scribe captured answers to BLM's questions on large sheets.

• <u>Fifteen Minute "Wrap-Up"</u>: the sessions ended with a 'thank you' wrap-up and reminder from the District Manager to put any **formal** comments in writing by the March 31 deadline.

Process Results of Efforts

<u>Attendance</u>: More than 350 people, including BLM staff, attended these sessions, roughly ten percent being elected officials. While BLM had received threats of disruption in advance of the sessions, the team of professional mediator/facilitators helped BLM reduce tensions and defuse hostile exchanges so that people who came to learn and provide input were able to do exactly that.

<u>Providing Comments</u>: Participants were informed that they had multiple means for providing comment and input to the BLM at this stage of the planning process:

- <u>Formal comment:</u> Members of the public were encouraged to submit **formal** comments in writing to BLM on its draft Planning Criteria document, which was released on February 24, 2014 and had an extended public comment period until March 31, 2014. Formal public comment sheets, information about a BLM web page designated to receive formal comments, and mail/email addresses for submitting formal comments were made available to everyone at the listening sessions. The facilitators encouraged participants to submit their own formal, written comments to ensure that their input was provided in their own words and received by BLM.
- <u>Informal discussion and input</u>: The public outreach sessions were designed to allow BLM to 'check in' with the public and inform them about the planning process; to roll out a draft preliminary range of alternatives being considered prior to conducting an analysis of the alternatives, and to receive **informal** feedback from stakeholders about their *clarifying questions* and *suggested approaches* that BLM had not already considered. The appendices to this Executive Summary provide summaries of these

inputs for each location; below is a summary of the themes heard across many or all of the locations based on the **informal** inputs.

<u>Format:</u> In a review of post-session evaluation sheets, all locations reported that the combined format of plenary and small group at the sessions were **more than useful** and **nearly 90%** of those who responded said the sessions provided opportunities for people to learn, be heard, and engage in dialogue about things that matter to them. While some people did not like the format, many appreciated the opportunity to hear and provide information in both large and small group settings. Comments on the evaluation forms, made to the facilitation team and made in open session also suggested that people felt the process and format did not allow as wide a range as many had hoped to discuss at the sessions.

In particular, at every session, there were comments about and objections to the Purpose and Need statement as being too narrow. As a result, some participants felt that the public discussion of the range of possibilities was hampered.

Substantive Results of Efforts

<u>General Themes</u>: The following list captures thematic areas about which the facilitation team heard consistently across many or all of the locations. These themes were in response to the questions posed to participants during the interactive stations exercise: *Do you have any clarifying questions? Are there additional approaches that BLM should consider analyzing?* It should be noted that individual preferences and perspectives varied amongst the themes; this list is a summary of the general themes heard repeatedly across the districts:

- BLM's land management is challenged by the checkerboard ownership pattern across western Oregon:
 - Consider adjacent land use, condition and good-neighbor relationships.
 - How will BLM collaborate with other agencies to form large block reserves for species conservation?
 - How will road closures impact access for recreation?
 - Consider public safety concerns.
- The Purpose and Need has defined the decision space narrowly and, as such, does not accurately reflect the importance of the O & C Lands Act's mandate as a 'dominant use' in which sustainable harvest and funding to counties for public services should be positioned over other purposes and needs:
 - Where do 'people' fit into the plan, its graphics and other materials?
 - 500 million board feet metric should be included as a required outcome for all alternatives.
 - 0 & C Lands Act provisions should be in front of, not equal to, other regulatory laws such as the Endangered Species Act and Clean Water Act.
- BLM should integrate its management objectives, and look for ways to manage lands for multiple uses:
 - 'Mix and match' approaches across the alternatives

- Recreation could be combined with other management goals to provide multiple use opportunities.
- BLM should analyze alternatives using the best available science:
 - How will BLM use modeling and on the ground data to analyze for effects?
 - Climate change is an important component for consideration in analysis and should be clearly addressed in the planning documents.
- A central concern is how this plan will impact revenue to counties.
 - How will BLM analyze the alternatives for socioeconomic impacts?
 - Should this be a key objective driving development of all alternatives?
 - Consider alternatives that can be funded and implemented.
- BLM should clarify how this RMP process interfaces with other proposals or plans (e.g. U.S. Senator Wyden and U.S. Congressman DeFazio's proposed legislation, the 2008 WOPR and the NW Forest Plan (NWFP))? Consider:
 - Incorporating the other proposals and plans as alternatives to be analyzed
 - Utilizing research, data and successes from other plans in this plan
 - Coordinating planning efforts with other agencies
- Consider a site specific approach to land management.
 - Rely on local, on-the-ground expertise to make decisions:
 - Enable field managers look at individual streams and site characteristics (slope, stream type, soil type).
 - Enable field managers to take discrete approaches for wet and dry forests.
 - Clarify how BLM will manage for fires and fire prone areas.
- Take a multi-species approach to managing lands.
 - Consider protection and habitat for multiple species, not just endangered.
 - Consider various habitat conditions (early seral, older forest) for multiple species.
 - Consider wildlife migration patterns and corridors.

<u>Topic Specific Repeated Themes</u>: The following list capture more specific comments or questions that were heard repeatedly at the topic stations. These by no means capture all of the comments, but rather form a list of comments heard at most, if not all of the sessions:

- <u>Species Conservation</u>:
 - How will BLM choose large block reserves based on historic, known, and/or potential presence of Northern spotted owl? Will this be done with habitat modeling and/or survey and manage?
- <u>Riparian Reserves</u>:
 - Analyze alternative(s) that include greater than one site potential tree height buffer and/or variable width buffers.
 - Allow foresters, ecologists, and managers more discretion in managing riparian reserves based on aspect, surface geology, sediment/erosion potential and other site specific considerations—not a one size fits all approach.

- Analyze and manage riparian reserves for a suite of species, not just fish and water quality.
- <u>Timber Management</u>:
 - Clarify the definition of older forests.
 - The public expressed a range of perspectives about the definition of 'older forests'— from 80 years to >250 years.
 - Develop an alternative using 'ecological forestry principles' (e.g. ProfessorsNorm Johnson and Jerry Franklin's approach)
 - Define what BLM means by 'sustainable' harvest.
- <u>Recreation</u>:
 - Consider range of needs and interests related to access, i.e. road and paved path access for elderly and less abled, off road vehicle, non-motorized and over the snow access, as well as access to recreation opportunities in both urban and backcountry settings.
 - Consider range of needs and interests related to multiple use opportunities, i.e. utilizing lands for ALL recreation activities (hunting, fishing, hiking, equestrian, rock gathering, etc.), timber production and wildlife needs.
 - $\circ\quad$ Protect and/or expand current recreation opportunities.
 - Clearly outline how you will address and fund safety and maintenance services of recreation sites to avoid adverse impacts on neighboring landowners and counties.

Conclusions

The public outreach sessions highlighted areas on which the BLM will need to focus as it proceeds with developing its Resource Management Plan for Western Oregon. The above lists are only those themes heard repeatedly at most, if not all, sessions. Additional ideas and thoughts were shared and are captured in the attached reports from each of the specific sessions. All of these comments will be utilized by BLM's Inter Disciplinary Team (IDT) as it proceeds with analysis of the alternatives. The report will be shared with BLM's Westside Steering Committee and posted on BLM's website for review by the public.

People commented, in writing and in person, that they learned new things and felt engaged in BLM's 2014 Public Outreach sessions. The small group facilitators report that the public also felt strongly about a wide variety of issues that BLM will need to consider and address as best it can with the new Resource Management Plans for Western Oregon. The complexity of the issues and the breadth of sentiment about those issues suggest that BLM should find ways to build on the momentum gained from this round of public outreach sessions by communicating frequently with the public about the plan, the planning process, and, ultimately, the decisions that will get made that relate to them both.

This report is respectfully submitted to the BLM by the Oregon Consensus facilitation firm of DS Consulting.

Appendix A: Portland Session Overview – March 3, 2014 (12 public attendees)

Plenary Session Questions/Comments and Answers

- Could a preferred alternative be a mix of the four combined preliminary options combined in different ways? <u>BLM response</u>: Yes
- Regarding the 'triangle' slide showing the need to balance the laws guiding BLM's work—are all laws equal or is 0 & C Lands Act on top as the slide shows? <u>BLM</u> response: BLM is required to meet all laws when managing resources.
- What plan does BLM have for climate change data integration? <u>BLM response</u>: We are working with other agencies and will conduct a climate change effects analysis.
- Is your current plan taking into account draft legislation that may come to pass? <u>BLM response</u>: No not yet. We are doing an independent process to revise our plan because it needs to be done. That said, if a bill were to pass, BLM would have to run a process showing how we would manage to any new requirement.
- How did you come up with your various riparian approaches? <u>BLM response</u>: The details of the data we used and the means by which we will analyze for effects is referenced in the Planning Criteria.
- What is your definition of 'old growth'? <u>BLM response</u>: The Planning Criteria discusses 'older and more structurally complex, multi-layered conifer forests' and 'late successional forests'; at this point, BLM is presenting, via its alternatives, what 'older forests' look like. There is no decision on the definition yet.

Station Comments Overview

Species Conservation

Clarifying questions included:

- How do these approaches help avoid Endangered Species Act (ESA) listings, especially those species dependent on early seral habitat?
- How do they address multiple species?
- How do they consider migration paths and corridors?
- How would each alternative impact revenue to counties from timber sales?
- Which areas will potentially get smaller over time?
- How do the approaches consider fire dependences?

Suggested approaches for consideration included:

• Protection for individual old growth (150 year old) trees

- Add large blocks to Alternative A given species mating considerations
- 160 year rotation of harvests
- Under Alternative A, minimize shorter rotations
- Provide an alternative that meets the 500 million board feet (MMBF) metric in the Oregon & California Lands Act (O & C Lands Act)

Other advice/comments for BLM:

- If species conservation comes into conflict with recreation, defer to needs of the species
- It would be good to be able to compare acreage numbers across the approaches to better understand the differences
- The visual maps are difficult to compare; is it possible to enlarge any of the areas for a closer look?
- Species conservation should be based on science and ecosystem criteria

<u>Riparian Reserves</u>

Suggested approaches for consideration included:

- Include alternatives with 2 site potential tree (SPT) height on fish bearing streams and drinking water sources
- Include 1 SPT height buffer on non-fish streams
- Allow for small gaps on edge of riparian reserve produce high quality early seral habitat
- Adaptive management approach that tests 1 SPT height on fish bearing streams
- Prioritize road decommissioning in reserves only allow removable, temporary roads
- Incorporate 2 SPT height into Alternative A
- Consider alternative with 2 SPT on fish streams, 1 SPT on non-fish and no commercial harvest in reserve
- Consider alternative between 1 SPT and 2 SPT reserves explain why alternatives are 1 SPT and not 2 SPT

Other advice/comments for BLM:

- Focus alternatives on the "best available" science
- Use on-site visual to determine "true" riparian area based on riparian function
- Create reserves that have good habitat for all species (e.g. non-fish streams habitat is common for amphibians)
- Continue to protect non-fish and intermittent streams, provide linkages between headwater streams

<u>Timber Management</u>

Clarifying questions included:

- How are planning criteria reflected in these alternatives?
- What is the definition of clear cut versus regeneration harvest?

Suggested approaches for consideration included:

- Range should clearly reflect BLM's requirements to meet 0 & C Lands Act (500 MMBF metric)
- Include 'ecological forestry principles' (Norm Johnson & Jerry Franklin approach)
- Remove clear cuts from Alternative A
- Limit clear cuts small land sizes (2-5 acres)
- Longer harvest rotation (60-80 year old trees)
- Thinning of 40% of canopy (instead of clear cuts)

Other advice/comments for BLM:

- The Purpose and Need should clearly reflect BLM's requirements to meet the O & C Lands Act (500 MMBF metric)
- Process confusion wanted to discuss the Planning Criteria in detail at this meeting
- Take same approach for trail systems that you do for streams integrating with recreation
- Waiting for analysis to see whether and which alternatives meet requirements of 0 & C Lands Act
- On visual match up the colors
- Regarding roads: reduce road density no net gain of roads
- Look at sustainability certification (i.e. FSC) SPI to evaluate approaches to timber management
- Make visuals available on website

Recreation

Clarifying questions included:

- What will the alternatives provide (pertains to public access)?
- Where and what?
- Clarification of terminology for developed and dispersed?

Suggested approaches for consideration included:

- Adaptability for changing recreation demand
- Regional connections, state wide system of trails (specific to Alternative 3)
- Exceptions on a case-by-case basis
- Correlate alternatives with designated recreation areas

- All recreation activities are being looked at (passive to active)
- Include disabled access vehicles
- Don't make promises you cannot keep
- No mention of hunting, rock-hounding, fishing
- Improve presentation of information "key" blue/yellow dotted boarders; L → R view of charts

Appendix B: Eugene Session Overview – March 5, 2014 (39 public attendees)

Plenary Session Questions/Comments and Answers

- Could you provide a definition of sustained yield of timber? <u>BLM response:</u> Sustained yield of timber refers to BLM's requirement to provide a constant supply of timber from BLM lands in perpetuity.
- How does the public get access to the Planning Criteria? <u>BLM response</u>: The Planning Criteria is currently available on the BLM website, there are CD's available tonight, and hardcopies can be mailed to those interested. If you are interested in a hardcopy, please provide your mailing address on the sign-in sheet.
- Is this effort moot if U.S. Senator Wyden and/or U.S. Congressman DeFazio are successful with their proposed legislation? <u>BLM response</u>: As far as BLM planning efforts are concerned, we cannot account for draft legislation because it is not considered "reasonable and foreseeable" and cannot be counted on until the legislation is final.
- If the Wyden or DeFazio legislation moves forward will BLM revise their plan? <u>BLM</u> response: Yes, if legislation passes BLM will revise the plan as necessary.
- What will BLM do with issues that are raised tonight and are not addressed in the Planning Criteria? <u>BLM response</u>: All comments need to be submitted via the official comment form, either in paper or online on the BLM website. Please note that there is a lot of information that is included in the Planning Criteria that will not be addressed in the presentation or small group sessions tonight.
- BLM said that decisions have not yet been made; however, some decisions have been made that limit the range of alternatives. <u>BLM response:</u> Thank you for the opportunity to clarify. There have been no decisions made on the alternatives. Policy decisions, however, have been made regarding the parameters for decisions.
- Are the alternatives still open to comment if the scope is not comprehensive? <u>BLM</u> <u>response:</u> Yes, BLM is looking for public input as to whether or not the range of alternatives is comprehensive.
- How will someone know if issues are addressed in the Planning Criteria? <u>BLM</u> <u>response:</u> Mark Brown, BLM's Project Manager, can follow-up with individuals on content and location of subjects in the Planning Criteria.
- Will BLM include contiguous National Forest lands with wilderness characteristics that are adjacent to BLM lands? Specifically, Devil's Staircase? <u>BLM response:</u> BLM

policy takes neighboring lands designated as wilderness into account. Please make sure to officially comment if you have specific concerns or comments that you want to see addressed.

Stations Comments Overview

Species Conservation

Clarifying questions included:

- Large block reserves = species conservation?
- How are you managing for different species; listed and possibly future listed?
- Will 'survey and manage' become part of the plan?
- How far out can we go with 'meaningful' predictions?
- [Graphics are]Too abstract to tell are we allowing for development of ecosystems? Clearer definition is needed of what's being protected, age groups, etc.
 - Are all 'old growth' trees being protected?
- How do pilot areas inform and affect planning? How will pilot areas stand up in planning process?
- Which alternatives do not have survey management in play?
- How do you identify a 'stand' of trees?
- Will timberland be unencumbered by late successional reserves, e.g. marbled murrelet reserves?
- Will large trees be left standing?
- What are unintended consequences of planning?

Suggested approaches for consideration included:

- Look at ways to integrate recreation opportunities with other elements, regardless of other aspects
- Management for species conservation should accommodate climate change
- Moving away from 'management by extremes' approach more attention to low/moderate management
- Attempt to look at adjacent, non-BLM lands; consider impacts of how private land is/is not being managed
- Range of alternatives needs to be expanded to meet requirements of O & C Lands Act
- Preservation of contiguous forests
- Consider all species
 - Pay attention to deer and elk

- Alternative maps are confusing/difficult to interpret; need better way to communicate alternatives
- Need clear matrix of options
- Need to understand 0 & C Lands Act
- In analysis, want numbers of how/what BLM is protecting

- Need more detail in alternative plans to understand options
- Would be helpful to have real numbers to determine what the tradeoffs are
- Does greed enter in to any of the decision making?

<u> Riparian Reserves</u>

Clarifying questions included:

- What is rationale for 50 feet?
- What kinds of buffers would be around wetlands?
- How will roads be managed in Riparian Reserves? Some should be allowed
- What is being done for water supplies?
- How will trail systems be managed within Riparian Reserves?
- Will logging corridors be allowed in Riparian Reserves?
- How would fire salvage be applied in these alternatives?
- Will herbicides be used in any alternatives to meet objectives?

Suggested approaches for consideration included:

- Should have no clear cuts in or near riparian
- Prefer to see gap cuts in Riparian Reserves or other treatments besides thinning
- Would like to see mix/match riparian alternatives with other aspects
- Consider treatments in Riparian Reserves based on basal area considerations
- High densities in Riparian Reserves will help carry fire, particularly in dry forest
- Consider management for invasive species
- Take in to account climate change in alternatives
- Consider non-commercial thinning in Riparian Reserves
- Need to consider the need to have openings/sunlight on stream
- Need to meet needs of 303(d) listed streams
- Tall trees should be considered in collecting fog and contributing to water
- All streams should be considered individually because of their variability
- Would like to see alternative with 2 site potential tree (SPT) height
- Would like to see an alternative closer to the State of Oregon's Forest Practices Act
- Concern over what will happen on adjacent lands wants to see a conservative approach

- Quest for predictability sacrifices on ground flexibility
- Concern that retention trees would prevent debris flows
- Look at results of studies on gap creation affects (e.g. Hinkle Creek)
- All ephemeral streams are not the same geologically and this should be considered in setbacks
- Do not see a true 'clean water' alternative
- Analysis must consider economics of each alternative
- Concern over fire spread manage to minimize fire risk manage more like your 'garden'

Timber Management

Clarifying questions included:

- How can we access the age class maps?
- Why is there no Resource Advisory Committee? Federal Lands Policy Management Act
- How big is a stand?
- How will road structure be maintained?
- What is the reforestation plan in clear cuts without herbicide?
- How much of a range exists re: harvest levels? Are we just reshuffling the same cards?
- How does neighboring private land affect BLM's planning process?
- What are the projected harvest yields?
- How do we know what age stands are in existence now? (If all 80 year old, in 40 years = 120 year old)
- Where do 'invasive species' fit in?
- Is climate change impact reviewed every year?

Suggested approaches for consideration included:

- Consider cutting older trees in order to increase forest health
- How to manage noxious weeds getting in to private land
- Topography, roads, water runoff/landslides, etc. where fits in
- Sustained yield only when benefits of timber production exceeds the cost
- Move to 60 year old limit
- Move to 160 year old limit
- Consider a 'thinning only' alternative (may not be sustainable)
- Alternative to leave out age class restriction way to adjust? (fire, wind, aging of forest) or freeze in time?
- Alternative A but no clear cut, switch regeneration with Alternative B
- Mix and match from among alternatives
- No clear cutting 30-50% retention
- 100 years of no management for fire suppression = big danger
- Do not use firm age restrictions may be impossible to implement site by site

- Fully account for the costs of carbon in timber management plan in the form of solid sawn products
- Carbon trading?
- Need to meet 0 & C Lands Act what dollar amounts are related to this?
- Maps are hard to understand
- Consider using different terminology i.e. clear cut/regeneration
- More information about age classes of trees
- Keep counties' needs on the table how to get that information to the public?
- Do not be ambiguous re: fire 'salvage' or other post fire management

- Need to know sustained yield numbers
- Climate change as a factor we need reforestation on a crisis level (Purpose and Need may be irrelevant predicted 90% extinct species by 2030); incorporate latest and best climate change science
- Communication with other tribes (e.g. Warm Springs)
- Factor in fire risk: thinning can increase or decrease risk
- Climate change more droughts will affect sustainability, or warming/moist more rain. Take this in to account. (How it affects sustainability)

Recreation

Clarifying questions included:

- What will the alternatives provide (pertains to public access)?
- Where and what?
- Clarification of terminology for developed or dispersed?

Suggested approaches for consideration included:

- Support for multiple use timber <u>and</u> recreation on lands
- Wildlife habitat and climate change should be considered in any and all alternatives
- Include future recreation opportunities in an alternative
- Include alternative that prioritizes quiet recreation over motorized recreation
- If recreation resources are harmed from timber harvest, replace or create new recreation opportunities
- Maximize recreation, recognizing other uses and needs; specify management by land characteristics
- Consider managing lands for recreation unless it is specifically not designated for another purpose
- Consider a recreation FIRST alternative (timber, etc. not a priority)

- Collaborate with local communities and government to promote tourism i.e. bike trails; collaborate with volunteer organizations for maintenance
- Offset dependency on timber revenues with recreation revenues
- Create a plan that is financially supported
- Protect natural beauty for people and wildlife
- Make distinction between legal and illegal recreation; block road access
- Consider impacts of non-recreation designated lands on neighboring lands
- Strong support for protecting road access
- Strong support for protecting trails
- Create opportunities for mushroom/truffles picking and Christmas tree harvest
- Increase BLM revenues through additional recreation opportunities
- Consider revenue sources and reality of maintaining recreation opportunities

Appendix C: Salem Session Overview – March 6, 2014 (28 public attendees)

Plenary Session Questions/Comments and Answers

- Could you provide a definition of sustained yield of timber? <u>BLM response</u>: Sustained yield of timber refers to BLM's requirement to provide a constant supply of timber from BLM lands in perpetuity.
- How did BLM request input on the Purpose and Need? <u>BLM response</u>: We shared the Purpose and Need with cooperating agencies for input. The current official comment period is the first opportunity for the public to comment on the Purpose and Need.
- What has changed between the 2008 Resource Management Plan (RMP) and this planning effort that requires that BLM contribute to the conservation <u>and</u> recovery of species? <u>BLM response:</u> A number of things, including a suite of new science available and the U.S. Fish and Wildlife Service issuance of designated Critical Habitat areas for listed species.
 - Follow-up Comment: There was designated Critical Habitat during the last planning effort, there was also a recovery plan. <u>BLM response</u>: BLM is planning this time to have a predictable flow of products off of BLM lands.
- Is the Coquille reservation land formally BLM land? <u>BLM response</u>: Yes, the land was transferred as part of 1996 legislation.
- Who are the Cooperating Agencies? <u>BLM response</u>: Federal and state agencies, tribal governments, counties and the Association of Oregon & California Counties (AOCC).
- Why not add a quantifier to sustained yield and be clear on the benefits to counties that are derived from revenues? <u>BLM response</u>: We are not able to provide metrics yet, as the analysis has not yet been conducted.
 - Follow-up comment: The Oregon and California Lands Act (O & C Lands Act) mandates 500 million board feet (MMBF) annually.
- Is BLM partnering with U.S. Senator Wyden and Congressman DeFazio to address these issues? <u>BLM response</u>: Revising the RMP is BLM's only tool to use to address the declining revenues to counties. BLM does not proactively plan with legislators; legislation needs to be final and then BLM can respond accordingly.
- Can BLM use U.S. Senator Wyden and Congressman DeFazio's plans as alternatives? <u>BLM response</u>: No, the Wyden and DeFazio proposals do not meet the planning

requirements of "reasonable and foreseeable" outcomes; the proposals are too uncertain at this point to incorporate into the RMP.

- What is the purpose of the Planning Criteria? <u>BLM response</u>: The Planning Criteria lays out how the analysis will be done. This is the public's opportunity to review and provide comment on the proposed analytical process.
- How is the land swap set up? <u>BLM response</u>: The Large Block Reserve design in the Planning Criteria is on BLM land only, so there is no land swap contemplated. To the extent possible, BLM is factoring in neighboring land uses; however, BLM is not making designation on lands other than BLM lands.
- What is the process for land swaps? Is there public input? <u>BLM response</u>: That is a good question for a BLM Planner. It is not BLM's intention to swap land for this planning effort; however, the RMP can identify lands that BLM would be open and/or likely to swap.

Stations Comments Overview

Species Conservation

Clarifying questions included:

- Why does the 'No Action' alternative not include the most recent designation of critical habitat from U.S. Fish and Wildlife Service?
- How will BLM look at other species of concern, not just listed species?
- What is a "large block"? Minimum? Maximum?
- How do barred owl impacts come into play? Is barred owl being managed to protect Northern spotted owl habitat?
- "Potential habitat": how do you know it will be occupied? What if the species leave that area?
- Is habitat still considered valuable even if it is not occupied by target species?
- How do these alternatives sustain large block older forests?
- Will BLM analyze for carbon? How?
- How does timber management interface with these species conservation approaches?

Suggested approaches for consideration included:

- Develop a fifth alternative to show how BLM will meet 0 & C Lands Act requirement of 500 MMBF that also satisfies Clean Water Act (CWA) and Endangered Species Act (ESA) requirements
- 2008 RMP decision should be included for analysis
- Older trees = 250 years or older
- Protection of older trees should depend on structure, not age

Other advice/comments for BLM:

• Links to cited studies are broken in on-line Planning Criteria

- Consider adjacent lands when managing for timber
- Consider data regarding the red tree vole, and other species of concern: early seral, elk, black tail deer, etc.
- Consider Marbled Murrelet Recovery Plan
- Presidential Executive Order 13443 need to address relation to species of concern
 - \circ $\;$ Western Oregon elk nutrition and habitat model should be used to analyze
- Consider wildlife corridors connectivity and species movement
- Consider corridors, connectivity specifically as it relates to climate change

<u>Riparian Reserves</u>

Suggested approaches for consideration included:

- Could use state water quality standard as a preliminary alternative
- Would like the opportunity for land managers to make decisions that meet needs, but without the prescriptive nature seen in these alternatives, i.e. consider slope as shade to achieve lower temperature
- Alternative D looks the simplest to put into practice in terms of avoiding guess work about fish presence
- Need alternative that shows and analyzes State of Oregon Forest Practices Act stream buffers
- If riparian reserve burns, leave large trees for species habitat
 - Leave some, but also remove/sell to help with restoration costs post-fire
- Looks as though the range of possibilities here will lead to finding a good balance between 0 & C Lands Act, ESA and CWA

Other advice/comments for BLM:

- Do a long-term analysis of large wood recruitment in un-thinned versus thinned Riparian Reserves
- Let managers manage with the talent they have
 - If managers manage, be certain all aspects are balanced: ESA, CWA, O & C Lands Act, etc.
- Consider soil type when analyzing slope and possibility of erosion to assure clean water
- Protect water quality from herbicide actions: maintain current practice of using none
- Consider whether wet/dry makes a difference in how Riparian Reserves function and are managed
- Consider wildlife corridor benefits

<u>Timber Management</u>

Clarifying questions included:

• Do large block reserves (LBR) stop on BLM lands or do they incorporate neighboring land use?

Suggested approaches for consideration included:

- Consider alternative with maximum and minimum harvest
- Do not include harvest from LBR in sustained yield numbers
- Consider patchwork cut approach to benefit ecological functions
- Include salvage plan for forests burned, quick harvest, and regenerate land

BLM Public Outreach Sessions March 2014 Revisions to RMPs for Western Oregon Executive Summary

- 30% retention in regeneration harvest
- Consider starting new forests through higher percentage of regeneration; avoid creating ALL 120 year old forests that are off limits
- Consider 'old growth' as older than 160, and as young as 80 years old
- Consider alternative that includes both clear cut and regeneration
- Create alternative that fully meets requirements of the O & C Lands Act for sustained yield; meeting minimum requirements of 500 MMBF
- Leave substantial blocks of trees in regeneration harvests
- Include diverse range of age class stands within the harvest land base
- Need alternative that has regeneration harvest in Doug fir/hemlock type of forest in order to meet sustained yield
- Create a fixed harvest land base (HLB); avoid the HLB turning in to LBR or other designation

Other advice/comments for BLM:

- Consider diverse needs of species different species need different types of forests
- Recognize availability of early seral lands on neighboring lands
- Incorporate economic sustainability of management
- Current alternatives create 'age gap' no new forests created
- Consider multi-species in reforestation
 - Take steps to regenerate clear cuts for multiple species
- Avoid creating 'tree farms'
- Consider adjacent land use and condition
- Consider industry input also take in to consideration Oregon's mill infrastructure
- Consider riparian protection when harvesting

Recreation

Suggested approaches for consideration included:

• Access should be identified/included paramount to utilization of lands

- Consider wildlife, hunting, foraging, fishing
- #13443-2007-PXO Presidential EO How is BLM complying?
- Effect on dispersed camping
- Positively consider mode of access as it pertains to aircraft/aviation critical functions
- Seek balance in providing access to utilize lands
- Access is hampered by checkerboard effect

Appendix D: Roseburg Session Overview – March 10, 2014 (46 public attendees)

Plenary Session Questions/Comments and Answers

- Is the Oregon and California Lands Act (O & C Lands Act) addressed in the Planning Criteria, specifically in regards to generating revenues? BLM needs to provide revenue to the counties. <u>BLM response:</u> The Purpose and Need (P&N) addresses the requirement to provide a sustained yield of timber. BLM feels that the P&N addresses the BLM's requirements from the O & C Lands Act.
- Is the Clean Air Act a part of the suite of laws that BLM needs to abide by with the plan? <u>BLM response</u>: Yes, the Clean Air Act is one of the many laws that BLM will adhere to.
- How does BLM's plan relate to U.S. Senator Wyden's proposal? Is his proposal one of the alternatives? What happens if Wyden's proposal goes though? <u>BLM response:</u> BLM can only plan for 'reasonable and foreseeable' outcomes, and we cannot plan on Wyden's proposal right now. If the legislation passes and mandates BLM to take a specific action, then BLM will comply.
- Will you summarize the public's input for the elected officials' outreach session? <u>BLM response:</u> Yes, an informal summary will be provided for the elected officials.

Stations Comments Overview

Species Conservation

Clarifying questions included:

- Do murrelets really need to fly that far inland?
- Can BLM take neighboring habitat into account?
- How do the other species fit into this owl-centric plan?
- How does BLM manage for fish hatcheries?
- Does 'large block' status still function within checkerboard ownership?
- How are we sure that owl population is not increasing, since they have only been studied since the 1970s?
- If owl populations are declining, are the reserves just going to be used by barred owls?
- What does management for Northern spotted owl habitat prohibit? What is not allowed in reserves? Recreation?
- What is the definition of 'no treatment', specifically for Alternatives B &C?

Suggested approaches for consideration included:

- Manage to salvage major disturbance events
- Only reserve the actual nesting tree
- Increase age of old growth reserves to 250 years

- Alternatives need to confidently manage for other species
- Conservation needs to be considered in specific ranges
- Consider a range of habitat as owls are opportunistic and can adapt
- Maintain recreation access to large block reserves
- Protecting older forest needs to happen in all alternatives
- Recreation and species conservation should and can happen together in Alternative A
- Allow commercial thinning in plantations

Other advice/comments for BLM:

- Findings and assumptions need to be verified before they can influence the management plan
- All alternatives need to conform to U.S. Forest Services' Recovery Plan for Northern spotted owl and murrelet
- Alternatives should not focus on 'acres versus acres', but more on the outcomes
- Manage to achieve desired conditions, not necessarily a hands-off approach
- Late Successional Reserves on map is misleading; there are also riparian reserves and stands greater than 120, 140, 160 in reserve
- Plan needs to take multiple resources into consideration
- Clarify *when* stand age is considered, at the time of implementation or?
- Recognize limitations of a 'large block' on checkerboard ownership
- Consider funding to acquire and trade lands to create block ownership
- 'Survey and manage' should *not* be a part of the new management plan
- Restoration post-disturbance
- Manage land to avoid major disturbance events
- Too much land is set aside for a species in decline
- Value other species besides owls
- BLM needs to harvest post-fire
- More carbon sequestration analysis

<u>Riparian Reserves</u>

Clarifying questions included:

- How do the Riparian Reserves meet the Aquatic Conservation Strategy (ACS)?
- Why change Riparian Reserves from existing if what we are doing now is working?
- Can we cross Riparian Reserves with cable corridors?
- How are Riparian Reserves identified or defined?
- What is the intensity of thinning treatments within Riparian Reserves?
- Are there criteria used to explain why BLM would enter Riparian Reserves?
- Monitoring requirements in Riparian Reserves are complex now. What will monitoring look like?
- Is science behind Riparian Reserves buffer proposed?
- Do we need to have an alternative with no buffer?
- What role does ACS have in Alternatives B, C, D?
- Why is non-commercial harvest proposed in Alternative A?
- How is the vegetation management Record of Decision incorporated, or not, into this effort?
- How do Riparian Reserves alternatives meet the 0 & C Lands Act?
- Why is 1 site potential tree (SPT) height width is used?

• How does BLM determine fish/no fish streams?

Suggested approaches for consideration included:

- Non-commercial treatment within Riparian Reserves or other restoration activities within no treat area
- Keep Riparian Reserves management simple with limited analysis requirements
- Active management in Riparian Reserves (habitat restoration)
- Different management in Riparian Reserves based on existing conditions (previously harvested versus unmanaged)
- Address fire hazard within Riparian Reserves
- Alternative A with commercial thinning where practical to restore plantations to increase diversity and development old growth
- Address corridors/linkages for terrestrial species
- Incorporate gaps in Riparian Reserves to benefit fish
- Quantify "no-cut" vs "treated" areas in Riparian Reserves for each alternative
- Allow blow down salvage or fire salvage within Riparian Reserves; no buffer
- Fire prevention management within Riparian Reserves
- Commercial salvage after fire, blow down, etc.
- No continued buffers, too wide
- Incorporate variable width buffers based on site characteristics
- Alternative using State of Oregon Forest Practices Act for Riparian Reserves management
- Provide flexibility in Riparian Reserves management in checkerboard ownership
- Riparian Reserves management to increase fish habitat by removing barriers
- Combine maximum harvest alternative with maximum entry alternative in Riparian Reserves proposed
- Gradual treatments in Riparian Reserves; vary intensity of management within Riparian Reserves as the project approaches stream
- Riparian Reserves assigned based on fish species present

- Consider slope/aspect differences when applying Riparian Reserves widths and management actions
- Chemical application buffers in Riparian Reserves
- Explain the benefit of non-commercial treatment in Riparian Reserves
- Hinkle Creek research should be considered
- Road building in Riparian Reserves should be allowed; cable corridors etc. are needed to manage land
- Local partnerships help define management of upstream and downstream objectives
- Management of Riparian Reserves upstream has downstream effects; upstream Riparian Reserve management may look different than downstream management
- Cumulative effects need to be addressed
- Do not overly restrict management of Federal lands to compensate for private management
- Define what types of management or activities (recreation, roads, drafting sites, etc.) will be allowed in Riparian Reserves
- Please make comments from break-outs available to the public

<u> Timber Management</u>

Clarifying questions included:

- What happens to stands when they reach 120+ years? Are they off-limits for harvest?
- Does the analysis include management practices on BLM in relation to adjacent private forest management?
- How do roads play into alternative development? Access issue for fire-fighting, timber management.
- Are there habitat or timber objectives for treatments on landscapes? They need to be specific with intentions. Why and how?

Suggested approaches for consideration included:

- No clear cuts within an alternative
- Add Wyden legislation as an alternative (to compare with existing alternatives)
- Variable Retention Harvest (VRH) needs to be more clearly identified in the alternatives
- Include 160 year old stands in timber base, define stand ages
- Include all stand ages in timber base
- Consider stand replacement events and how stands are managed regardless of ageclass and management of the stand; consider salvage in these cases
- Include clear cuts in all four alternatives
- The plan should be specific in determining the timber/harvest land base without other limitations, as a firm level of anticipated harvest in each alternative
- Alternatives should be designed to be as specific and simple to minimize additional IDT involvement
- Timber harvest should be designed for small operations

- Evaluate the DeFazio plan
- Analyze deforestation strategies
- Change visual maps accuracy (e.g. no heavy treatment in head waters)
- Differentiate between clear cut and other thinning treatments
- Erosion and soil needs to be analyzed
- All alternatives should include Aquatic Conservation Strategy (ACS) and carbon analyses (climate change)
- Include 'big picture' of each alternative in terms of climate change and planetary ecosystem (use best predictions and science)
- Analysis should include expected revenue generation per alternative; 500 million board feet (MMBF) minimum in the 0 & C Lands Act
- Optimum return of revenue needs to be emphasized
- Need to include analysis of wildfire; immediate salvage post-fire
- Purpose and Need is too narrow
- Give economics and livelihood more emphasis and focus in alternatives, to the same level as 0&C, ESA, etc.
- Consider alternative characteristics within stands and management options i.e. beetle infestations

- P&N of O & C Lands Act evaluated clearly for each alternative <u>and</u> Section 701 sub-section B of Federal Lands Policy and Management Act (FLPMA)
- Show us a plan that integrates all issues and how they interact
- Analysis of risk and exposure to fire
- Better define 'no treatment' under large block reserves
- Plan that integrates fuel reduction and production of 'biochar'
- Other interests should be sufficiently addressed, so that when you get to timber harvest areas, there is a reasonable surety that trees <u>will</u> come out
- Alternatives need to be described in more detail

Recreation

Clarifying questions included:

- How does travel management tie in with the alternatives?
- Are we developing an unrealistic alternative Alternative D?

Suggested approaches for consideration included:

- Access should be identified/included paramount to utilization of lands
- Alternatives by different types of recreation, not by amount
- No reductions in facilities in Alternative A
- Consider land swaps as part of Alternatives C and D
- Alternative A, has most wildlife protection and should have increased recreation opportunities; alternatives are not compatible between resources

Other advice/comments for BLM:

- Motorized off-road recreational opportunities not well defined or described; clarify what and where motorized off-road recreation can and cannot occur
- Recreation alternatives not compatible with other alternatives, i.e. maximum timber
- Do not make Off Highway Vehicles (OHV) motorized recreation more restrictive than current condition
- Alternative selected needs to have reliable funding for development (Alternatives C and D) and maintenance
- Need good balance think outside the box; some uses are quite compatible, for example timber, OHV, and hunting
- Checkerboard ownership is not conducive to travel management
- Need primitive back country in Roseburg
- Recreation is a by-product, secondary use for sustained yield forestry (0 & C Lands Act), as long as no conflict occurs with timber, is pre-dominant use section 701 subsection B
- Look at Oregon Department of Forestry's management practices regarding timber and recreation
- Access is critical; need secure and legal access to recreation opportunities
- Utilize local user groups for maintenance (implementation)
- Need to have road maintenance funded for access (implementation) to recreation sites

Appendix E: Coos Bay Session Overview – March 11, 2014

Plenary Session Questions/Comments and Answers

- Can you please provide clarity about how the public input could be impactful if one's interest is not part of the Purpose and Need Statement (P&N)? <u>BLM response</u>: The Purpose and Need was released in June. Prior to release it was reviewed internally by the State Director and all the way up to the Secretary of Interior. As a result of this intense review, BLM is relatively firm on the Purpose and Need.
 - Follow-up Comment: The Purpose and Need does not have revenue generation for counties as a goal and should.
- The impacts of global warming and ocean acidification need to be included in the P&N, as they will impact timber management. <u>BLM response</u>: The P&N is a tool to help frame alternatives. There are lot of important things in the Planning Criteria that are not included in the P&N. Climate change is addressed in the Planning Criteria as well as in analytical questions as part of the analysis.
- Can BLM impose climate change regulations on states? <u>BLM response</u>: BLM is not in a position to regulate the states. We only can manage BLM lands; however, BLM may be able to lead by example.
- Old growth timber is dying timber, elk and deer need 2nd and 3rd generation stands to support populations, and clean water is also derived from these younger stands. A 120 foot buffer in Coos, Curry and much of Douglas County would limit the majority (2/3) of the knoll to logging. Mining will also be limited because equipment cannot access lands with dense buffers.
- BLM is using 10-15 year old data to justify current plans, specifically data on the nesting habitat for spotted owls. Spotted owls are opportunistic species that will nest anywhere. BLM needs to use updated science to inform their Environmental Impact Statement.
- Douglas fir did not exist in the coast range 6,000 years ago during the last ice age. Clear cuts and herbicides are not sustainable and old growth is better for salmon.
- Will the Facilitator's summary of these sessions be made public? And will it reflect district specific comments? <u>BLM response:</u> There will be a general overview online.
- Will the official written comments be made public? <u>BLM response</u>: The official comments will be generally reflected in the draft.
- Revenue generation should be included in the P&N.

• BLM should create Resource Management Plans (RMP) specifically for each District instead of an umbrella RMP that is then catered to Districts.

Stations Comments Overview

Species Conservation

Suggested approaches for consideration included:

- Consider where nesting owls are currently and protect blocks around them
- Consider land exchange opportunities to consolidate Large Block Reserves (LBR) and conservation
- Expand 'older forests' to 250 years
- Consider how neighboring lands are used and how that plays in to LBR
- Alternative D does not meet the large contiguous block needs for species
- Consider allowing mineral extraction and other use (recreation) in LBR
- Do not have buffer zones around LBRs
- Reduce the amount of edge habitat through thinning and LBR in order to reduce predators of endangered species
- Selective cut and thinning to promote species conservation also using smaller logging opportunities
- Do not abandon clear cut it will allow BLM to meet harvest requirement

Other advice/comments for BLM:

- Higher consideration of human needs is needed, potentially even site specific
- Recognize endangered species as indicator species
- Set aside land for conservation and some land for other uses
- Consider human needs
- Consider flexible designations and revisit frequently to allow for changes on landscape
- Habitat conservation and old growth protection is not equal to timber production
- Create plan to eliminate predators of species that you are trying to preserve

<u>Riparian Reserves</u>

Clarifying questions included:

- Why change from Northwest Forest Plan (NWFP)? Why change Riparian Reserves if what we are doing now is working?
- Can we cross Riparian Reserves with cable corridors?
- How are Riparian Reserves identified or defined?
- Intensity of thinning treatments within Riparian Reserves?
- Are there criteria used to explain why or when we would enter Riparian Reserves?
- Monitoring requirements in Riparian Reserves are complex now; what will monitoring look like?
- Is science behind the proposed Riparian Reserves buffer?
- Do we need to have an alternative with no buffer?
- What role does Aquatic Conservation Strategy (ACS) have in Alternatives B, C, and D?
- Why is there 'non-commercial harvest' proposed in Alternative A?

- How is the vegetation management Record of Decision (ROD) incorporated, or not, into this effort?
- How do Riparian Reserves alternatives meet the Oregon and California Lands Act (O & C Lands Act)?
- Explain why 1 site potential tree (SPT) height width is used?
- How does BLM determine fish/no fish streams?
- Can we 'count' Riparian Reserves for multiple values? Clean water, wildlife and recreation?

Suggested approaches for consideration included:

- Range of alternatives should consider small streams with appropriate sizes
- Site specific buffers: tailor to each individual stream
- Riparian Reserves assigned based on fish species present
- Streams without salmon (anadromous fish) present should have less protection
- Site specific aspect of streams, i.e. North, South, East, West

Other advice/comments for BLM:

- Having Riparian Reserves measured on slope height decreases the size
- Deviation from NWFP could increase timber volume
- Riparian Reserves are in violation of the 1872 Mining Act
- Riparian Reserves should be developed by Inter Disciplinary Team (IDT) that is site specific
- More consideration to all vegetation types, not just trees
- Gain a better understanding of sub-surface stream flow and how these relate to Riparian Reserves
- Historical ecology of a river system and how it relates to the Clean Water Act (CWA)
- Consider surface geology and historic ecology of stream
- Consider water flow in each stream; with steeper slopes need to extend Riparian Reserves
- Make sure the science that Riparian Reserves are based on is included in the RMP
- Need to keep some habitat intact
- Include paper by Chris Frissee in RMP
- IDT should define the intermittent streams parameter
- Make documents more readable to public
- Consider soil types near streams
- Consider landscape that the stream flows through as well as management activities on private land

Timber Management

Suggested approaches for consideration included:

- Alternative that maximizes harvest land base
- Consider timber conservation land trusts
- Alternative that replicates a mixed-age forest, irrespective of economic value
- Include fire management as a goal

Other advice/comments for BLM:

• Consider type of tree species and how it relates to management plan

- More priority to human needs and need to take in to consideration not just endangered species
- All alternatives should be analyzed re: whether they meet the minimum requirement under O & C Lands Act
- Manage different terrains in different ways—take in to consideration contiguous lands and landscape views
- Nothing said specifically about revenues resulting from harvest and volume; we want to see these both in the analysis
- Provide opportunities for Forest Stewardship Contracts (FSC) opportunities
- Economic support of our communities is paramount
- U.S. Forest Service and BLM why not work together?
- Take in to consideration the costs of harvest types
- Look at long term effects compared to short term benefits
- What are we giving up long term for short term economic gain?
- Hold back cuts to drive prices up
- Consider a cutting scheme that will meet maximum carbon fixing and sell carbon credits to fund counties
- Create sustained yields that will support public services

Recreation

Clarifying questions included:

• What would each alternative provide as far as job creation from recreation?

Suggested approaches for consideration included:

- Consider leaving some land alone, keep some habitat intact without other use allow BLM to meet P&N study areas (baseline recreation alternatives)
- Consider keeping lands with wilderness characteristics for conservation
- BLM should consider less restrictive no facilities management of recreation

- Continue to allow public access on non-designated lands
- Continue to allow access and maintain roads for improved access
- May be difficult to implement Alternatives C and D due to limited funds
- Consider other agencies land management and use to be strategic with recreation plan
- Include experiences allowed in alternative descriptions
- Under 0 & C Lands Act recreation is a secondary use
- Use recreational lands to meet other purposes and needs, i.e. fire management
- Revenue needs to pay for 'itself'; pay its own way; cost neutral
- Clarify the benefits of minimal development benefits of recreation management for minimal impacts
- Revenue generation as a goal in recreation management in planning criteria
- Consider the benefits of roads for access for people of all abilities and ages for recreation

Appendix F: Medford Session Overview – March 12, 2014 (150 public attendees)

Plenary Session Questions/Comments and Answers

- It was our understanding that there was going to be a meeting where the public could provide input on the 'ingredients' for the alternatives, but it seems like BLM has already developed the alternatives. <u>BLM response:</u> The alternatives are not yet developed, they are preliminary. This is the public's opportunity to weigh in on the alternatives.
- Why is there not a committee here to represent the miners? BLM is required to make sure that the right people are here for the conversation. The 1872 Mining Law and Grant states that BLM does not have authority to plan for mining on BLM lands. <u>BLM response</u>: BLM is considering mining in the Planning Criteria. There are many components of the Planning Criteria that are not detailed tonight, however they are still being considered.
- BLM is presenting a lot of information for the public to digest; the 30-day public comment period seems too short. <u>BLM response</u>: BLM is on a tight timeline to complete the RMP. We want to collect input along the way as much as possible, however, also need to get the proposals out to the counties as soon as possible.
- Is BLM currently working under the 2008 Western Oregon Plan Revision (WOPR)? <u>BLM response:</u> No, BLM is currently operating under the 1995 Northwest Forest Plan and its 1995 Resource Management Plans.
- What are the current conditions in regards to the alternatives for timber and recreation management? Which alternatives are closest to current management? <u>BLM response:</u> The 'No Action' alternative describes the current management conditions.

Stations Comments Overview

Species Conservation

Clarifying questions included:

- How is mining affected by the species conservation alternative(s)?
- Will there be limits/restrictions as to how the public can 'enter' or use large block reserves, i.e. can they drive into them; can they use motors, etc.?
- How are we going to protect any species added to Threatened and Endangered list <u>after</u> the plan is written?
- What other species could shut down logging?

Suggested approaches for consideration included:

- Consider 180 year stands as a starting age for stand reserves
- Healthy forests needs to be the intent behind all alternatives
- Consider exempting Oregon and California lands from this Resource Management Plan (RMP)
- Do not like Alternative A and Alternative D because too 'spread out' and would rather see a more concentrated reserve system

- Species conservation is in conflict with Oregon and California Lands Act (O & C Lands Act)
- Alternative D ("smallest" land area) may not be accurately represented as 'least impact/invasive'
- Medford district will have its own RMP
- Concerns regarding fire management and species conservation in general, i.e. mudslides, water degradation, forest habitat loss, etc.
- Concerns about the 1866 and 1873 mining lands access → species conservation alternatives will not further restrict access
- Leave the earth in better shape than we found it = less impact
- BLM should place more access/gate restrictions, do not open the gates because of lack of law officers to effectively manage
- Concerned that reserves have contributed to increase in illegal activities, i.e. marijuana growing, etc.; also, BLM officers should be under Sheriff authority
- Be careful to abide by and be guided by accurate science
- Important to consider and protect biodiversity
- Concerned that species conservation will hinder or harm farming
- Concerned that planning criteria is flawed for determining which and how much lands are set aside into reserve planning
- Wants to see that species surveys are completed <u>before and after</u> timber harvest
- Protect endangered loggers and miners
- Need better habitat management for owl recovery, not just protection of more acres

 do this through economic support from the timber harvest and manufacturing
 infrastructure
- BLM should require the U.S. Forest Service to prove its hypothesis
- Retain entire ecosystem and all components because ecosystem retains/supports our trees
- Sage grouse? BLM website shows them in Klamath and Medford District- needs review
- Too many laws upon laws
- Concerned of getting 'locked out' of BLM lands if we protect them too much

<u>Riparian Reserves</u>

Suggested approaches for consideration included:

- Apply riparian strategy across the landscape; have no harvest strip
- No clear cuts in riparian reserve
- Clear cuts to edge of stream in certain situations (per recent study)
- Leave 500 foot buffer on all streams with no harvest on both sides
- Reforest riparian zones after wildfires
- Restrict devastating harvest to one alternative
- All alternatives should reflect mining laws of 1872 and the exemptions therein
- Recommend variable widths
 - Variable width riparian zones per Gordie Reeves Net Map analysis
 - o Variable width analysis needs to be in alternatives
 - Variable buffers offer management flexibility
- True riparian areas need to be identified
- The buffer width should be based on all the criteria available including economics, science, etc.
- Soil type should be considered in determining riparian reserves
- Look at entire landscape but be site specific
- Remove all riparian reserves
- High traffic areas need additional buffers

- Include analysis of climate change and make economic analysis of harvest in riparian reserve
- Analyze conflicting agency activities in order to have alternatives that work
- Need site specific analysis in riparian reserves (note: recommended by 63 people) Gordon Reeves Approach use Mapnet
- Compensate private property owners when management has effects
- Review mining law and apply as appropriate
- Include maps that show types of streams
- Create as much protection of riparian reserves for the importance of economic impact of water needs in the Applegate Valley for wine and farming
- Climate change needs to be part of the analysis, earth-crust movement especially
- Include economic analysis of areas where there is no harvest
- Impacts on other species need to be included as economic analysis in riparian reserves
- Travel analysis needs to be included so roads can be in Riparian Reserves
- Fixed widths create a cookie-cutter effect
- Be sure to account for the mineral estate in all alternatives
- Take into consideration the effect of actual implementation on the Riparian Reserve
- Be sure to take into effect other species that live and occupy Riparian Reserve
- No riparian area should ever be considered old growth

- All riparian areas should be open for hunting, mining, and harvest
- Consider the quantity of land excluded from harvest weigh the economic benefits and costs of Riparian Reserves (be sure to display this clearly)
- North & South Rogue Watershed analysis needs to be considered and used in Riparian Reserve analysis
- BLM Riparian Reserve buffers should not impact private property especially farm land
- Remove all gates on roads that impact access to Riparian Reserves
- There should not be a blanket policy to remove all gates local characteristics such as attractive nuisances need to be considered
- Turbidity does not affect fish negatively
- Policy decisions should be based on good science and not the volume of comments
- Fund additional studies to clarify direction and incorporate into RMPs

<u>Timber Management</u>

Clarifying questions included:

- How long can things be sustained before we run out of land base?
- Will old growth definition change under new management versus existing management?

Suggested approaches for consideration included:

- Climate change maximum retention of trees for carbon storage
- No limitation of forest management; site-based conditions drive action
- Retention of old growth stands and species
- High rate of uneven aged and skips and gaps
- 120 years- forest age retention based on strand average or individual tree
- Consider alternatives that follow 0 & C Lands Act for revenue generation
- Larger harvest land base and less reserves
- Alternatives for ecological purposes i.e. projects similar but larger across land base
- Forest management in consideration of climate change based on site conditions
- Consider an alternative that disregards Endangered Species Act (ESA) and O&C lands and does not impede farming
- No clear cuts on urban/wild lands interface
- Allow fire salvage logging on a quick time table and expedite replanting
- An alternative that has no clear cuts in moist or dry stands
- Quicker and more replanting after disturbances
- Allow clear cuts after fires as part of salvage
- Allow salvage logging after disturbances
- Do NOT allow salvage logging
- New alternative allow passive management based on current science landscape scale
- Retain age structure with more thinning only landscape level

- Management of forest for sustainable yields per 0 & C Lands Act
- Avoid one size fits all management between moist and dry forests
- Alternative that includes regeneration that meets ASQ target and 0 & C Lands Act (500 MMBF target)
- Alternative that harvests 1.3 billion across 0&C counties

Other advice/comments for BLM:

- Give U.S. Forest Service clear direction regarding jurisdiction over mining claims
- Area considered in matrix can grow or shrink
- Clarify BLM definition of sustainable yield
- 1872 Mining Law include definitions in document
- Acknowledge 0 & C Lands Act has specific purposes
- Include historical dates on logging and timber management changes from sustainable timber
- Definition for sustainable yield use Federal Lands Policy and Management Act (FLPMA) definition
- Learn from other areas that manage sustainable timber and incorporate those practices
- Uneven age should be science based
- Gates removed off roads and closed roads re-opened
- Definition of sustainable yield timber harvest organic growth rate
- Balance of FLPMA and O&C lands
- Include site based productivity to see growth potential versus today
- Increase fire wood permits and fewer restrictions
- Increase clear cuts based on species and tree science
- Focus on dead and dying regardless of size
- Look at value in a broad sense, then board feature
- Definition economic sustainability
- Base alternatives on facts and sound science = impact on humans and economics
- Address pine beetle issue
- Require value added, i.e. that logs be processed in our state of Oregon

Recreation

Clarifying questions included:

• What is BLM's strategy for adjacent landowners (security + funding) – especially concerned with vandalism and marijuana

Suggested approaches for consideration included:

- Do not prohibit access to lands that are not designated for recreation
- Consider neighboring landowners and impacts of recreation on their lands
- Allow more access on lands that are not designated for recreation
- Alternative A does not include areas for Off Road Vehicles (ORV) because there are not developed ORV areas in Medford district

• Make sure the range of alternatives stays within the requirements of O & C Lands Act and Judge Leon's decision

- Close all roads that do not have designated access to avoid illegal dumping
- Do not cut off any hunting or motorized use, mining, or target shooting –also, remove the gates; do not charge fees
- Ensure safe target shooting opportunities to avoid creating unsafe situations for neighboring landowners
- Timber revenues should provide for plenty of funds for recreation
- RS 2477
- BLM should not be managing for recreation
- Do not have policy to open all gates unilaterally trails should have to follow National Environmental Policy Act (NEPA) process in order to be approved
- Create more opportunities for public input on site specific recreation designations
- All trails should be open to all people
- Create criteria for designating ORV areas need to have minimum acreage, contiguous lands and consideration for neighboring landowners
- Leave all of the gravel roads open to ORV
- Manage more ORV areas
- Keep in mind how all of the management practices (recreation, timber, riparian) interact with each other (impacts, etc.)
- Consider economic impact of recreation operations
- Classification for over-the-snow recreation and non-over-the-snow recreation
- Keep logging roads open to all or recreation access more important than adding facilities
- Follow NEPA process no grandfathering in trails
- BLM needs to provide security to neighboring landowners gun threats
- Consider fire dangers that increase with increased recreation use
- Consider designated shooting areas safety for humans and ecosystems

Appendix G: Klamath Falls Session Overview – March 13, 2014 (2 public attendees)

Plenary Session Questions/Comments and Answers

- How is the management of the reserves done? The reserves should be managed for fire; timber will need to be cut out of the reserves otherwise the forest will burn and become useless. <u>BLM response</u>: The large block reserves are designed to take care of, protect and conserve owl and murrelet habitat. In regards to managing for fire, the Purpose and Need states that alternatives will work to restore fire adapted ecosystems.
- BLM should keep the management of the reserves in the hands of local foresters who know the land and how to manage it.
- Would BLM allow any harvest of timber in the reserves? <u>BLM response</u>: A very small amount of harvest would be allowed in the reserves. Similar to how U.S. Fish and Wildlife allows for active management in designated Critical Habitat areas.
- The U.S. Fish and Wildlife has provided species conservation sideboards for Critical Habitat and Recovery Plans; BLM will need to stay within those sideboards in order to pass muster.

Note: Only one person remained for the small groups and no notes were taken as he was given a tour of the topic area stations.

Appendix H: Roseburg Session Overview – March 17, 2014 (25 attendees-mostly elected officials)

Plenary Session Questions/Comments and Answers

- The Purpose and Need Statement (P&N) constrains the range of alternatives; the Association of Oregon and California Counties (AOCC) is working with the Resource Management Plan (RMP) Project Manager, Mark Brown, to ensure that the range is expanded where possible.
- AOCC wants to make sure that the public is heard, recognizing that not all of the public can make it to these sessions. Specifically, AOCC wants to make sure that the economies of the local communities are represented.
- Not all laws are created equal; the Endangered Species Act (ESA) and the Clean Water Act are not equal to the Oregon and California Lands Act (0 & C Lands Act). AOCC will ensure that the 0 & C Lands Act reemerges prominently in the RMP.
- The O&C receipts help to fund the counties and are an important part of the plan. These lands are public lands that belong to every citizen and are not only AOCC lands. There is too much pressure put on the BLM's public lands to provide revenue, while private lands are not even taxed by Oregon's Department of Forestry. If severance tax were collected on private lands it could provide revenues to counties.
- It looks as though BLM is forgetting about the value of these lands for the people. There are shared needs, including species, water <u>and</u> people's needs. BLM needs to consider how to manage the lands to provide for sustainable economies, livable communities, jobs and forest production.
- BLM cannot treat the O&C lands separately from other lands; species management needs to take into consideration how neighboring lands are managed.
- There is no real science backing murrelet conservation and recovery. BLM is working on assumptions.
- Would BLM be willing to present to legislative land-use/natural resources committee in May or September? <u>BLM response:</u> Yes, of course.
- How much of the information from the Western Oregon Plan Revision (WOPR) is being utilized in this planning effort? There was a lot of effort spent on that plan and it would be a shame to have it wasted. <u>BLM response:</u> BLM is using as much of the information from WOPR as possible. At the same time, there have been some advances in the best available science, so not all of the information is relevant for this RMP process.

• BLM is giving the public the impression, through its materials, slides and graphics, that these only are National Forest lands; they are not showing the sheriffs, veterans, or health and social services that depend on these lands; BLM is not showing the communities that these lands were designed to support.

Topic-based Comments Overview

For this session, the format changed so that the topic-based information revolved in front of the whole group of elected officials rather than smaller groups revolving to the stations. The following comments were from the whole group together.

Species Conservation

- What is the working relationship with the U.S. Forest Service (USFS) on the O&C Lands? <u>BLM response:</u> BLM coordinates with the USFS. They are one of our cooperating agencies. However, this plan only pertains to BLM lands.
- The Purpose and Need Statement appears to provide for recreation, species conservation, etc. *before* providing sustained yield of timber. It appears that timber is given 'what is left' after these other considerations. That is a major concern here. The emphasis is on the other five categories and what's left is to be used for sustained yield. Consequently, this Plan is 'upside down' in its priorities. <u>BLM</u> <u>response:</u> BLM sees all criteria in the P & N as equal. Sustained yield is NOT lower than the other criteria. To be considered, the alternative we end up selecting must meet ALL of the criteria in the P&N.
- The triangle slide in your presentation shows the Clean Water Act (CWA), Endangered Species Act (ESA) and the O & C Lands Act as equals. How do the alternatives achieve a balance between these Acts?
- 'Clear cut' is not what we do in forest management today. We do not use that term. Why is the BLM using that term here?
- The really important issue is: what if the spotted owl conservation cannot be achieved and so you cannot get to the sustained yield of timber? What happens if there is not room for all of these goals?
- The O&C counties think there is another way to create a plan that conforms to the O & C Lands Act and provides for the other needs—fish, clean water, spotted owl, etc. The counties want to balance the O & C Lands Act with these other needs, and that is why we are working on a different approach than what the BLM is doing here.

- Looking at the O&C Lands and the checkerboard pattern between private and BLM land, I do not see any large blocks of land for spotted owls as you show on your maps. Therefore, I think you need to bring in the USFS to use their large blocks of land for owl conservation and endangered species and concentrate the BLM O&C lands for timber harvest and recreation only.
- Industrial timber companies also are major players and take these issues into consideration. If they are brought into this process they will work with us to address these issues.
- There is a focus on the spotted owl, but there are many other ESA listed species on these lands. How do these alternatives address these other listed species? <u>BLM</u> response: The analysis will cover a wide range of other listed species.
- The problem with the Northwest Forest Plan (NWFP) was it was trying to address conservation in a species-by-species basis, and that did not work because a lot of the decisions were pushed down to the project level. Therefore, this plan needs to work on a large block basis to avoid that. A habitat-based plan is, therefore, better than a species-by-species approach.
- What does 'large block reserves' (LBR) mean exactly? <u>BLM response</u>: It is a size that varies by each alternative.
- How does BLM get large blocks that extend beyond the O&C Lands, since each block is a square mile?
- How do alternatives promote balance between the various legal requirements? I do not see the balance presented in species conservation alternatives.
- What happens if BLM cannot balance <u>all</u> of the needs?

Suggested approaches for consideration included:

- Need to plan for other Threatened and Endangered (T&E) species current and future; consolidated habitat management, not species by species.
- Consider partnering with National Forest, private landowners and other land holding agencies (e.g. USFS) to create LBR's and keep the O&C lands for timber production

Other advice/comments for BLM:

• Concern that sustained yield of timber is not receiving equal treatment compared to other components of P&N.

<u>Riparian Reserves</u>

- For the range of alternatives related to CWA and ESA, are you managing for the 2008 EIS? These alternatives are more protective than the 2008 EIS. If you go "north" of the 2008 EIS, how do you balance management for sustained yield of timber?
- What constitutes a stream here? What's the definition? <u>BLM response</u>: Where scour is evident, that is defined as an intermittent stream. Where flowing water is present year-round, that is defined as a perennial stream.
- The NWFP now is the most multi-use plan. There is more site-specific ability under the NWFP than in these other alternatives. <u>BLM response</u>: The NWFP was intended to be an 'interim' plan, but there was never any refined or final plan developed. There is more flexibility in the new alternatives than under the NWFP because the NWFP operates under the Aquatic Conservation Strategy (ACS). These alternatives do not incorporate the ACS.
- We did an analysis under the Governor's Gang of 14 process: The Conservation community got 300% of what their objectives were. Why are these alternatives moving away from the NWFP if that's true? <u>BLM response</u>: These alternatives are different than the NWFP with different site potential tree (SPT) heights than were developed under the NWFP. The ACS focuses on multiple objectives that can compete with one another. The Riparian Reserve alternatives BLM is proposing to analyze at this time <u>only</u> focus on what is beneficial to fish and clean water.
- If logging roads are not a 'point source' for pollution, than how are the Riparian Reverses a point source for pollution? These riparian areas are not a point source for pollution; therefore these zones do not fall under the purview of the CWA. <u>BLM</u> <u>response:</u> The CWA covers more than point sources; it also takes into consideration water temperatures, not just turbidity and sediment.
 - Follow up Comment: Yes, but studies on temperatures show that shade is not a factor for influencing temperatures.
- Do these Riparian Reserves take into account dry forest conditions and fire resiliency? <u>BLM response:</u> Yes, we are considering fire issues within the alternatives.
- You use the word 'balance' and focus on what is good for fish and water, but not timber or other considerations.

- How can BLM meet the CWA and ESA objectives with the least impact on timber management? What are the least number of acres that are needed to meet the CWA and ESA mandates, and still get out the maximum timber?
- What are the policies for reserves under the Oregon Forest Practices Act? Why not use them?
- BLM only controls a small percentage of the streams on the landscape. Other landowners and their management decisions are also at play here.
- The WOPR took huge amounts of money and time to develop riparian protections. A study was done recently on the Trask River that studied four riparian areas under the BLM management guidelines, private lands management, Oregon Department of Forestry guidelines, and a control area. The study showed that there was little difference in the response in the study areas between the management approaches. Will BLM look at that study and look at how other treatments may meet ESA and CWA objectives? <u>BLM response:</u> Yes, we will be looking at these new studies.
- Wind prone areas will have more blow down and may need greater setbacks. Is blow down included in 35 feet?

Suggested approaches for consideration included:

- Consider less the conservative/restrictive alternatives which were proposed in 2008 RMP.
- Coordinate riparian reserves with neighboring land uses i.e. Oregon Forest Plan

Other advice/comments for BLM:

• Do not need to create plan that has more protection than the NWFP - conservationists needs are met with NWFP

Timber Management

- Can you translate the alternatives into acreage for timber management? <u>BLM</u> <u>response:</u> The analysis has not been conducted yet, so we do not have acreages at this point.
- What process will be used to determine whether commercial or non-commercial management will be used? And what will be set aside?
- How will the lands be assessed on the ground to determine what is harvestable and what is not? <u>BLM response</u>: BLM staff will go out and 'field truth' a sample of the lands to ensure the harvestable lands that are designated are in fact harvestable. BLM will not field truth every acre.

- Which 'half' will be set aside for conservation? <u>BLM response</u>: It depends on the conditions and the species.
- I would like to see a 'clean, mean plan' or we will not have predictability. We have learned that 'process rich' leads to paralysis. <u>BLM response:</u> These alternatives do result in less flexibility in the proposed approach. Predictability is an outcome BLM is seeking with this plan.
- Will there be a way to get away from litigation with these plans? <u>BLM response:</u> The BLM hopes so! We think increased predictability will help avoid some, but not all, future litigation.
- These alternatives focus on either reserves or timber harvest objectives. I am not seeing restoring fire resilience to the forest as a goal. We need to not only have habitat and timber management objectives, but also fire resiliency objectives in these plans. <u>BLM response</u>: There is a lot in the Planning Criteria that is not being shown here. During this outreach effort we are only highlighting the 'big ticket' items based on what we heard from the public during our listening sessions last fall.

Suggested approaches for consideration included:

• Allow for active management for both fire resiliency and species habitat

Other advice/comments for BLM:

- Suggestion to 'ground truth' to see whether specific lands should be included in the harvest land base
- Need accurate and realistic analysis that is implementable
- Purpose and Need constrains discussion about timber management
- Communities/counties needs and interests need to be represented

Recreation

- Of course there has been interest from the public in recreation opportunities. However, the practicality of delivering recreation opportunities does not 'wash' with the other mandates, including timber yields.
- The true financial costs need to be a reality check on all these alternatives. BLM cannot sustain what it is doing now; it cannot increase management options for all these issues.
- BLM had great recreational facilities back when the timber was harvested. Now there is not sufficient money. How does the BLM expect to provide these recreational amenities without adequate funding?
- How will BLM maintain trail systems if the budget is cut?

- If BLM proposes several levels of recreation, then it needs to include how these different recreation options will be funded.
- If you have more funding from additional timber harvesting, then the BLM will have more funds for recreation. Is that correct? Isn't there a designation under the O & C Lands Act for a percentage of funds to go back to recreation?
- How are locked gates going to be addressed given the wide use of motorized vehicles on these lands? <u>BLM response:</u> A threshold issue is whether BLM has secure legal public access on a particular area.
- BLM is talking about expanding recreation when Counties currently do not have adequate funding to provide basic safety for citizens, such as adequate Sheriff patrols. Will BLM provide funds for adequate security in these recreational areas also or will this burden fall on counties?
- The BLM Resource Advisory Council (RAC) study did not find funding for adequate policing to patrol these lands. In fact, county Sheriffs do not have funding for equipment and thus are not prepared for emergencies that may happen on BLM lands. The public is recreating on public lands, but county Sheriff departments cannot get the equipment needed to provide safety and rescues for the public until an actual need exists.
- There is inconsistency between recreation and timber management when talking about large block reserves (LBR). You take into account other large block areas when discussing recreational opportunities and Endangered Species Act concerns, but not when looking at timber management. Therefore, it appears like there is a bias against timber management in these alternatives. <u>BLM response:</u> The decision space is on BLM lands only, but we do coordinate with other partners when looking at ESA habitat, recreation, etc.
- The U.S. Forest Service and BLM should be talking and going through this process together. <u>BLM response:</u> Yes, BLM and USFS are talking. However, this planning process is different from USFS planning, particularly since these lands are managed under the O & C Lands Act, which the USFS does not have to address.
- Why not let the USFS take the lead on species conservation and clean water since they have much larger blocks of land to manage? Then BLM can take the lead on timber harvest under the O & C Lands Act.

Suggested approaches/advice for BLM consideration included:

- Ensure that recreation designations are practical with other land use needs
- Consider costs of alternatives and ability for BLM to sustainably implement
- Clearly illustrate long term costs of alternatives
- Plan for public safety and patrol on BLM lands counties do not have the financial ability to patrol; funding
- Encourage BLM to partner with other federal agencies