

Committee for Family Forestlands

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To: United States Forest Service
Date: August 15, 2014

Re: Comment on Blue Mountains Forest Plan Revision #31195

The Oregon Committee for Family Forestlands* offers the following Comment on the Proposed Revised Land Management Plan, Preferred Alternative E, for the Malheur, Umatilla, and Wallowa-Whitman National Forests.

The CFF was established by the Oregon State Board of Forestry to assist the State Forester and the Board on issues relevant to some 70,000 family forestland owners in Oregon. In 2011 and 2012, the CFF undertook a comprehensive study of family forestlands on Oregon's Eastside, an area that includes these federal Forests. We identified several key, interconnected issues challenging small forest landowners in Eastern Oregon. Those issues are listed in the Executive Summary to our study, which is appended to this Comment. (The full study, *Oregon's Eastside Forests 2012: The Family Forestland Owner's Perspective*, is available at http://www.oregon.gov/ODF/Pages/board/cff/cff.aspx#Accomplishments_&Policy_Statements.) We urge USFS Planners to review our work as background to this Comment and to others that may be submitted by local landowners or landowner organizations.

Our chief concern is that small forestland owners, who literally ring these federal Forests, are not formally identified as potential partners or affected parties in any part of the Plan, including the Preferred Alternative.

As will be immediately apparent from the accompanying map, small family forestlands (red color) border these federal Forests at almost every point. Yet the Preferred Alternative barely mentions neighbors. Issue 2, Economic and Social Well-Being (EIS, Volume I), identifies the "potential effect of large disturbances, such as insect and disease or wildland fire, on the economic and social well-being of local communities," but nowhere are these effects on local forestland owners addressed. Other sections of the EIS and proposed Plan focus on "public use" of forests and the economic impacts those public users have on population centers in the forests' vicinity, but no section of the report focuses on lands adjoining the Forests. For all the demographic data supplied in the EIS, very little information about the geographic area surrounding the Forests, which will be heavily impacted by plan choices, is provided.

The CFF is concerned that forest management practices in these federal Forests will, if this Plan is adopted, ignore significant impacts that those practices are likely to have on its neighbors. Without more careful thought and planning that includes consideration of such impacts, federal management choices could result in loss of control over resource land management by private landowners. Experience teaches us that failure to provide family landowners with some measure of control over their lands can lead to huge demographic shifts in land ownership patterns in northeastern Oregon.

Three areas of potentially great impact stand out in our minds:

1. **Overstocking.** These Forests are currently overstocked with trees, resulting in competition both between and among species that prevents growth of the large, mature trees that the public expects to find in its national forests. Moreover, the Forests are putting on more growth than is proposed for harvest, which will exacerbate problems posed by density. More significantly for neighboring families, overstocking creates conditions that fuel wildfires and encourage the spread of insect infestation and disease, each of which can cross boundaries into neighboring family forestlands.

Without an assessment of conditions on neighboring lands, whatever Plan is adopted runs the risk of establishing management goals and practices in isolation, the exact opposite of the broad landscape-level management recommended for the area as a whole.

Recommendation: Acknowledge that the Forests have neighbors, most of whom (as shown in red on the accompanying map) are small, family landowners who have their own goals and objectives for managing their lands. Include in the adopted Plan an obligation to work with neighboring landowners in identifying management practices for borderlands that benefit both parties. Ensure that the adopted Plan is sufficiently flexible both to protect those neighboring lands from possible adverse effects of federal management and to engage with neighboring landowners in ways that enhance forest health and benefits across both ownerships.

The CFF would also like to suggest that the Forest Service consider these private/public wild land interfaces when designing restoration work under the “Good Neighbor Policy” in an “All Lands Approach” in the 2014 Farm Bill. These areas could, for example, provide an opportunity to emphasize and/or concentrate Disease and Insect Infestation “3,000 acre treatments” under the Healthy Forest Restoration Act.

2. **Infrastructure.** Federal land ownership in NW Oregon is so vast that whatever federal management plan is put into practice will consequently determine the availability and scope of the local timber products infrastructure. Small landowners count on access to that same infrastructure for their own forest management practices.

Whether they plan to harvest trees or merely wish to live in a healthy forested environment, small landowners require professional services to assist them in meeting their goals. It should be noted that small forests provide a significant percentage of timber harvested in Oregon and that small landowners are especially sensitive to market changes. Last year (2013) the largest increase in Oregon's harvest (61%, from 318 mbf to 511 mbf) came from the small non-industrial forest ownership sector. The state Department of Forestry attributed this to the small landowner's ability to take advantage of a hot market for export logs. Without a robust infrastructure in place, this economic activity would not occur. If the federal Forests, through their management policies, allow that infrastructure to decline, family forestlands and local communities will clearly be adversely affected.

Federal forest managers are in unique position to help the professional forestry community thrive, not only for the benefit of federal Forests themselves, but also for neighboring landscapes. The adopted Plan should specifically address this concern for the benefit of the entire Oregon landscape.

Recommendation: Build into the adopted Plan a mindful approach to engagement with local forestry professionals, haulers, and mills so that other landowners are neither denied access to existing local services or forced to patronize distant (and therefore more costly) service providers because the local infrastructure has been eliminated. Consider establishment of cross-border partnerships that anticipate both collaborative identification of management issues and cooperative use of forestry professionals (for example, consultants,

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planners, loggers, haulers, and mills) as appropriate to the issues identified. Make use of the stewardship contracting tool and the Wyden Amendment (use of public funds on private lands to benefit ecosystem health) to work more effectively with rural communities and private landowners.

3. **Other.** Without drawing neighboring landowners permanently into the planning and implementing processes, the proposed Plan alternatives can only guess at what additional impacts proposed practices might have on small adjacent landowners. Wildlife corridors, roads and other access, blow down, water management -- each is likely to impact neighboring lands more than the Forests themselves.

The lesson here is that the Forests do not exist in a vacuum. Whatever practices are implemented within the Forests will generate consequences for neighboring properties and their owners. Those landowners deserve a formal seat at the table.

Recommendation: Build into the adopted Plan a requirement to consult with neighboring landowners with a goal of achieving positive results through management practices that provide benefits across forest boundaries. Institutionalize an effort to work with the NRCS (which engages with many small forestland owners) and the Oregon Department of Forestry under an "All Lands Approach" that focuses particularly on non-industrial private lands.

The Committee for Family Forestlands urges Planners, before adopting any Alternative, to consult with local landowners on every aspect of the proposed Plan that might affect border areas of these Forests. Without such consultation, no Alternative can be considered complete or reasonable. Moreover, consultation must be built into the Alternative ultimately selected, because management, access, and other issues are not static "problems" that can be "solved" at a single point in time. The final adopted Plan must include ways for federal managers to consult and work with their neighbors at every step.

We appreciate this opportunity to comment on your work.



Craig Shinn, Chair



Susan Watkins, Vice-Chair

cc: Oregon Board of Forestry Members
Doug Decker, State Forester
Senators Wyden and Merkley
Representative Walden

* The Committee for Family Forestlands is a standing committee established by the Board of Forestry to assist the State Forester and the Board of Forestry on issues relevant to some 70,000 family forestland owners in the state. Our committee is made up of family forestland owners from different regions of the state, environmental organization and forest industry representatives, a citizen-at-large and ex-officio members representing the Oregon State Forester, Oregon State University College of Forestry, Oregon Forest Resources Institute, the United States Forest Service, small forestland owner groups, and forestry interest/consulting groups.