Why a plan revision nobody likes?
The US Bureau of Land Management (BLM) is responsible for managing about 2.6 million acres of public land in western Oregon. Historic logging has severely degraded much of this land, but hundreds of thousands of acres of ecologically-valuable forests remain. These public forests are in our backyard in western Oregon, providing recreation, clean water, and numerous other public values. They are currently managed under the Northwest Forest Plan, the same plan that guides management of National Forests in western Oregon, which emphasizes protecting and restoring old-growth forests, wildlife habitat, and healthy streams.

Under the Bush administration, logging interests and the BLM worked together to put these heritage forests on the chopping block. The Western Oregon Plan Revision (WOPR for short) would have more than doubled logging across the landscape and clear-cut some of our last old-growth forests, degraded habitat for fish and wildlife and threatened the quality of our drinking water. Fortunately, thanks to years of public involvement and opposition, and legal action by Oregon Wild and other groups, WOPR was withdrawn.

The BLM went back to the drawing board, and has now released a new management plan revision we call WOPR Jr. Despite thousands of public comments and pressure from scientists and others to maintain and build on the stream, wildlife, and old-growth protections of the Northwest Forest Plan, the proposed plan – while not as bad as the previous iteration – takes a step away from common sense conservation measures. Timber interests still want more logging. The plan may go into effect in late 2016 if litigation doesn’t put it on hold.

What does the new plan do?
The BLM considered 5 main alternatives in their draft plan released in 2015. The proposed Resource Management Plan (RMP) includes elements from a variety of these alternatives. Like current management policy under the Northwest Forest Plan, the proposed RMP divides BLM land into different “land use allocations” – including old-growth reserves, riparian reserves, harvest land base, recreation management areas, and other special designations – but makes key changes to these designations that result in fewer protections for old-growth, streams, and wildlife, and increases in the most destructive forms of logging.
The proposed RMP would have the following impacts:

- **Eliminate key provisions of the Northwest Forest Plan** – The Survey & Manage protocol, the Aquatic Conservation Strategy, and strong standards for restoration of forests and watersheds would not be maintained.

- **Reduce wildlife habitat and protections** – The new plan will increase logging of forests that are home to threatened Marbled Murrelets and northern spotted owls, as well as eliminate surveys for rare plants and animals and removing protections for red tree voles in many areas.

- **Drastically reduce stream protections** – Hundreds of miles of streams running through BLM lands already violate water quality standards, but the PRMP eliminates the strong water quality and habitat provisions of the Northwest Forest Plan, reducing **streamside no-logging buffers by half or more**. This puts at risk recovering salmon and steelhead populations, drinking water quality, and wildlife that live near streams. In addition, the “outer zone” of the reduced Riparian Reserves is available for logging, and areas currently protected as reserves can be clearcut under the new plan.

<table>
<thead>
<tr>
<th>Riparian Reserve width</th>
<th>No-cut inner zone</th>
<th>Management in outer zone (outside of no-cut inner zone)</th>
<th>Total acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>NWFP</td>
<td>2 SPTH* on fish-bearing streams, 1 SPTH on non-fish streams</td>
<td>not specified</td>
<td>N/A</td>
</tr>
<tr>
<td>PRMP</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Class I(^1) subwatershed</td>
<td>1 SPTH*</td>
<td>120’ on perennial &amp; fish-bearing streams; 50’ on non-fish intermittent streams.</td>
<td>“Middle zone” 50-120’ on non-fish, intermittent streams: Thinning allowed, but no commercial removal in moist forests. Outer zone: Commercial thinning allowed. Must retain 30% cover or 60 trees per acre.</td>
</tr>
<tr>
<td>Class II(^2) subwatershed</td>
<td>1 SPTH*</td>
<td>120’ on perennial &amp; fish; 50’ on non-fish intermittent</td>
<td>Commercial thinning allowed. Must retain 30% cover or 60 trees per acre.</td>
</tr>
<tr>
<td>Class III(^3) subwatershed</td>
<td>1 SPTH* on perennial and fish; 50’ on non-fish intermittent</td>
<td>120’ on perennial &amp; fish; 50’ on non-fish intermittent</td>
<td>Commercial thinning allowed. Must retain 30% cover or 60 trees per acre.</td>
</tr>
</tbody>
</table>

*SPTH = Site-potential tree height, roughly 140-240 feet, on either side of stream
\(^1\)Class I subwatersheds: Contain critical habitat AND High Intrinsic Potential for listed fish species
\(^2\)Class II subwatersheds: Contain critical habitat OR High Intrinsic Potential for listed fish species
\(^3\)Class III subwatersheds: Contain neither critical habitat nor High Intrinsic Potential for listed fish species
• **Increase impacts from roads** – Though there are already 15,000 miles of roads on western Oregon BLM lands, with a maintenance backlog of $300 million, more than 400 miles of new roads would be built in the first decade of this plan, exacerbating problems for water quality, habitat fragmentation, and spreading invasive weeds.

• **Quiet recreation takes a back seat** - The plan designates more Recreation Management Areas that include many of the places Oregonians hike, picnic, boat, fish, and camp – great news! But in many of these places, logging plans and off-road motorized use take precedence and could diminish the types of recreation the vast majority of Oregonians enjoy.

• **More intensive logging across the landscape** - The proposal would see logging levels go up, on average, 37% from current levels. In the “harvest land base,” 60% of the logging would be focused on intensive logging, not thinning – leading to 90,000 acres of clearcut-style logging in the first 10 years of the plan. Logging (though not clearcutting) would also be allowed in old-growth reserves and in the outer zones of stream buffers – generating additional volume while degrading habitat.

• **Leave many mature and old-growth forests unprotected** – While some old-growth (or “structurally-complex” in the plan’s language) forests are protected under the PRMP, and about 85% of mature and old-growth forests are in reserves, loopholes large enough to drive log trucks through are found throughout the plan: within reserves, there is no limit on the age or size of trees that can be cut for some broad reasons, and outside of reserves 169,000 acres (15% of the total) of mature and old forests are completely unprotected from logging.

• **Increase negative climate impacts** – Logging transfers carbon from the forest to the atmosphere and destabilizes our climate: Increased logging means more carbon emissions. Economic studies also show that increased climate risks from increased logging could outweigh benefits by 60 times.

• **Protection of many Special Places** – Many special and wild places are set aside as Lands with Wilderness Characteristics (LWCs) or Areas of Critical Environmental Concern (ACECs), where logging takes a back seat to ecological values. That’s great! But it’s still a fraction of the places worthy of protection, and ACECs tend to be small and some are kept open to logging, off-road vehicle use, grazing, and mining.

![This century-old forest could be clearcut under the BLM’s proposed plan.](image-url)
How does the Proposed RMP do in addressing our concerns?
Over the past few years, conservation groups and concerned citizens weighed in on the draft plans and asked BLM to include key conservation measures in their final plan. Thousands of comments did just that. How did the BLM do in addressing our key comments?

- Protect native forests over 80 years old from logging. **FAILED**
  - About 85% of older forests are placed in reserves under the plan, but numerous loopholes – large enough to drive log trucks through – offer no guarantee that they’re protected from logging.
  - 15% of old forests are in the “harvest land base” – meaning intensive logging is prioritized, and even the oldest trees aren’t necessarily protected from harvest.

- Focus on thinning in young stands instead of clearcutting old forests. **FAILED**
  - In the “harvest land base,” 180,000 acres will be subject to clearcut-style logging that leaves just 10% of the trees standing. Another 90,000 acres will leave between 15 and 30% standing.
  - 60% of the planned logging over the first decade will be done as modified clearcuts, while 40% will be commercial thinning. None of this logging is limited to young stands.

- Maintain strong stream protections and watershed restoration standards under the current Northwest Forest Plan. **FAILED**
  - The PRMP eliminates the strong water quality and habitat provisions of the Northwest Forest Plan, reducing streamside no-logging buffers by half or more (a loss of 300,000 acres of streamside reserves). In addition, the “outer zone” of the reduced Riparian Reserves is available for logging, and areas currently protected as reserves can be clearcut under the new plan.

- Protect all proposed Lands with Wilderness Characteristics, Areas of Critical Environmental Concern (ACECs), and Wild & Scenic Rivers. **PASsING**
  - While we give the BLM a passing mark on this, it’s not an “A”. Some ACECs are still open to logging, off-road vehicle use, grazing, and mining, and while all “Lands with Wilderness Characteristics” identified by the BLM are protected, there are thousands more acres that are worthy of this designation that the BLM did not include.

- Emphasize non-motorized and quiet recreation. **FAILED**
  - While additional recreation areas are designated under the plan, in many of these areas logging and off-road motorized use take precedence and could diminish the types of recreation the vast majority of Oregonians enjoy.

- Maintain the Survey & Manage program to protect rare plants and animals. **FAILED**
  - The program is eliminated from the proposed plan.

- Reduce road impacts. **FAILED**
  - More than 400 miles of new roads would be built in the first decade of this plan, exacerbating problems for water quality, habitat fragmentation, and spreading invasive weeds.