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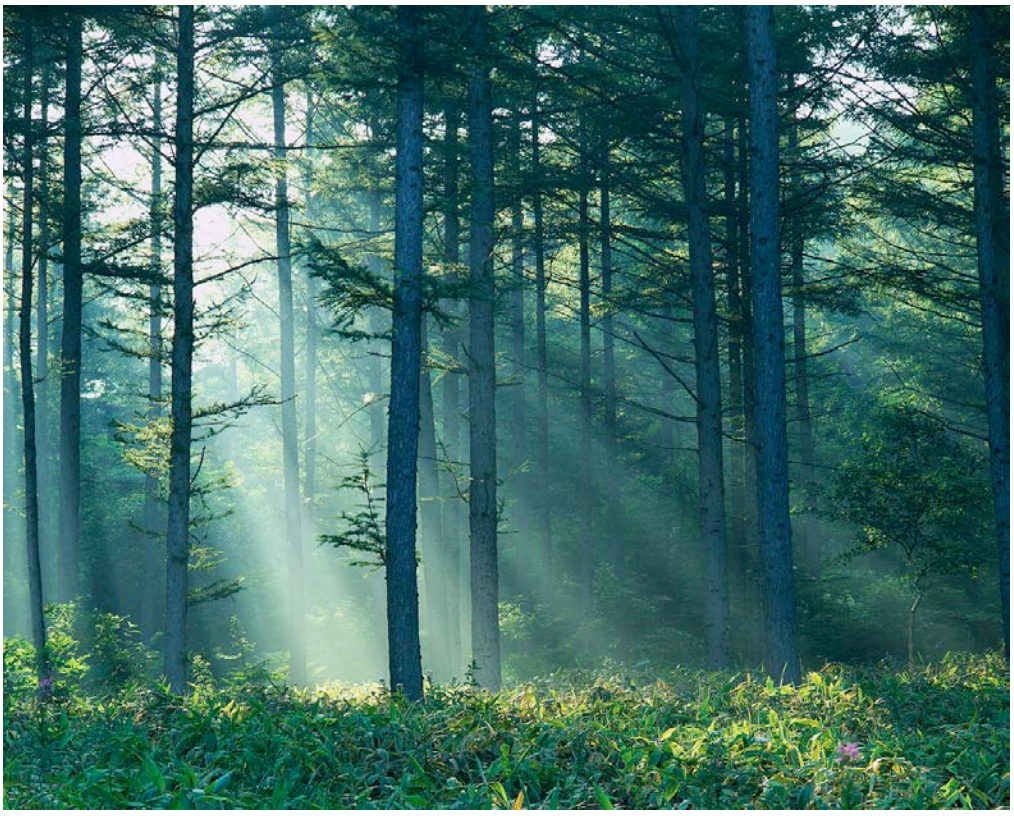


Resource Management Plan Evaluation Report

Western Oregon Districts

August, 2012

Table of Contents

A. Introduction

The Records of Decision and Resource Management Plans (RODs/RMPs) for the Coos Bay District, Eugene District, Medford District, Roseburg District, Salem District, and the Klamath Falls Resource Area of the Lakeview District were approved in 1995.

The 1995 RMPs were last evaluated in 2004. The 8th year evaluations found that most resource programs were functioning as anticipated in the RMP; however, the timber management program departed substantially from expected outcomes for many districts.

This evaluation evaluates implementation of the 1995 RMPs through the end of Fiscal Year 2010.

The BLM completed an RMP revision effort in December 2008. The Secretary of the Interior withdrew the 2008 RODs/RMPs in July, 2009 and the districts reverted to implementing the 1995 RMPs. In December 2010, the BLM initiated a plan evaluation since BLM policy requires periodic evaluations of RMPs (at a minimum of every five years)

On March 31, 2011, the United States District Court for the District of Columbia vacated and remanded the Secretary of the Interior's decision to withdraw the 2008 RODs/RMPs (Douglas Timber Operators et al. v. Salazar). The districts began implementing their 2008 RODs/RMPs. Because of uncertainty due to ongoing litigation the districts designed projects to conform to both the 2008 RODs/RMPs and the 1995 RODs/RMPs. Consequently, projects were consistent with the goals and objectives in both the 1995 RMP and the 2008 RMP. Since the evaluation of the 1995 RMPs was essentially already competed by this time, the BLM decided to complete this evaluation report.

Plaintiffs in Pacific Rivers Council et. al. v. Shepard challenged the 2008 RODs/RMPs and filed a motion for partial summary judgment, requesting the court to vacate and remand the 2008 RODs/RMPs. On May 16, 2012, the U.S. District Court, District of Oregon vacated the 2008 RODs/RMPs for western Oregon BLM districts and reinstated BLM's 1995 RODs/RMPs.

B. Purpose

Plan evaluation is the process of reviewing land use plans and monitoring reports to determine whether land use plan decisions and National Environmental Policy Act analyses are still valid and whether the plan is being implemented appropriately. The BLM evaluates land use plans to determine if:

1. Decisions remain relevant to current issues;
2. Decisions are effective in achieving desired outcomes;
3. Any decisions need to be revised;
4. Any decisions need to be dropped from further consideration; and
5. Any areas require new decisions.

The BLM planning regulations (43 Code of Federal Regulations, Part 1610.4-9) require periodic land use plan evaluations to determine whether mitigation measures are satisfactory, whether there have been significant changes in the related plans of other Federal agencies, State or local governments, or Indian Tribes, or whether there is new data of significance to the plan.

C. Method and Scope

Each district completed evaluations. The Oregon State Office (OSO) provided overall coordination and completed the evaluation report.

The BLM formed an interdisciplinary team to complete the evaluation and included the following positions (a list of specific individuals is included in Appendix 1):

- Western Oregon Planner, OSO
  - Overall Lead
- Forester/Resource Analyst, OSO
  - Forestry Lead
- Program Managers, OSO
  - National and state-wide policy review
  - Advice and lead contact for program specific data collection
- District Planners
  - District coordination and lead
  - Assist in evaluating and documenting results
  - Assist in writing draft and final evaluation reports
  - Collect RMP evaluation records for the district project file
- District Resource Leads/GIS specialists
  - District program review and data collection

The evaluations verified, updated, and refined the 2004 evaluation results. District Planners and other personnel reviewed the 2004 Evaluation Report along with annual program summaries and monitoring reports for their district and filled out the RMP Evaluation Plan Questionnaire and Spreadsheet (Appendix 2). District specific supporting data is contained in Appendices 3 – 8. The documentation of findings and results focuses on changes to programs since the 2004 evaluations. It is most important to understand programs that were meeting expected outcomes in 2004 but now are not meeting expected outcomes.

Data collection focused on the timber program since it had previously been found as not meeting expected outcomes (2004 evaluations) and for programs that had been previously meeting expected outcomes but are no longer meeting expected outcomes based on new information such as new laws, policy, or science.

D. Results and Findings

This section describes the status of RMP implementation and progress in achieving desired RMP outcomes. It examines individual program or resource management issues associated with plan implementation.

In discussing resource programs, the narrative describes whether existing decisions should be carried forward, modified, or dropped and if new decisions are needed. Specifically, the following points will be addressed as appropriate for each resource program:

Are RMP decisions being implemented as anticipated?

Are RMP management directions and land use allocations effective in achieving objectives or are changes warranted?

- Are there any conflicts between objectives/management direction/land use allocations for different programs?
- Is there new information or science that would invalidate National Environmental Policy Act analysis or point to management decisions or land use allocations as being ineffective in meeting objectives?

Are new RMP decisions needed due to new information, policies, executive orders, laws, or court orders?

Are there actions that would facilitate RMP implementation?

- Plan maintenance
- New or updated inventories
- New or innovative practices that would improve effectiveness and efficiency

This report also describes whether the 2008 RODs/RMPs and supporting Final Environmental Impact Statement addressed the identified new information or changed circumstances. This description was included so as to distinguish information that is new to just the 1995 RMPs vs. information that is new to both the 1995 RMPs and the 2008 RMPs. This description will be useful for future plan evaluations or planning efforts.

1. Common to All Districts

Timber Management and Silviculture

The 2004 plan evaluations concluded that implementation of the timber management program was departing substantially from the outcomes predicted in the 1995 RMPs. During this evaluation period (2004 – 2010), timber sales associated with the lands allocated to sustained yield timber production have continued to depart substantially from the assumptions of the RMP determination of the allowable sale quantity (ASQ).

The underlying assumptions from the RMP determination of the ASQ are used as the standard to measure plan conformance. These assumptions include the levels of regeneration and thinning harvest volume and the associated treated acres. The volume and acres associated with sold timber sales are used as the evaluation standard for implementation.

The supporting data and synthesis for each of the individual district's timber management evaluation is available in the appendices.

The primary areas of departure from the allowable sale quantity (ASQ) are summarized below.

Figure 1. ASQ Sold Sale Volume- Evaluation Period – Percent of Declared ASQ

- No district achieved the declared ASQ.

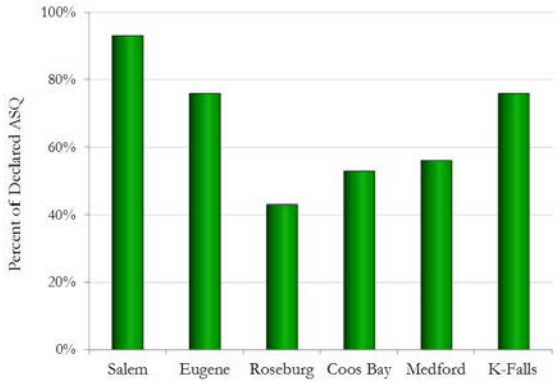


Figure 2. ASQ Regeneration Sale Volume – Evaluation Period – Percent of Assumed Levels.

- ASQ regeneration sale volumes were substantially below the assumed levels.

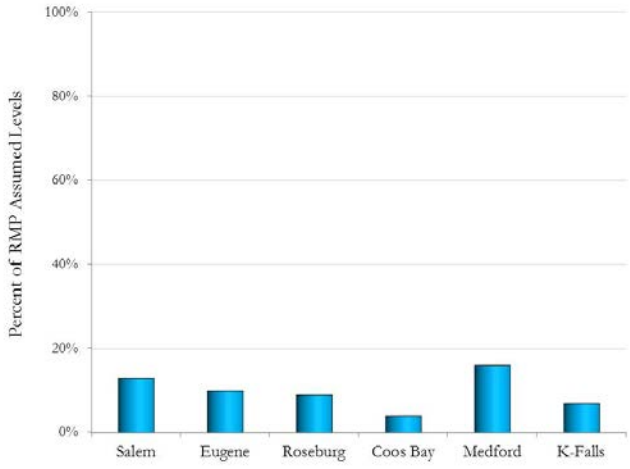


Figure 3. ASQ Thinning Sale Volume – Evaluation Period – Percent of Assumed Levels.

- ASQ thinning sale volumes were substantially above the assumed levels in the Salem, Eugene, Roseburg, and Coos Bay Districts.

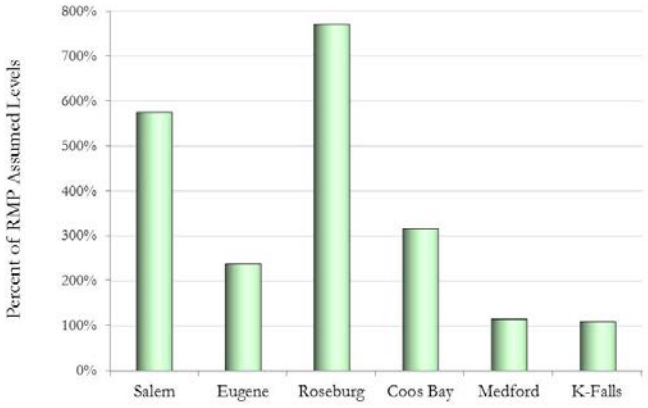


Figure 4. ASQ Timber Sale Acreage – Fiscal Years 1995 – 2010 – Percent of Assumed Levels.

- Total sale acreage from ASQ thinning and regeneration timber sales combined was substantially above the assumed levels in the Medford and Klamath Falls.

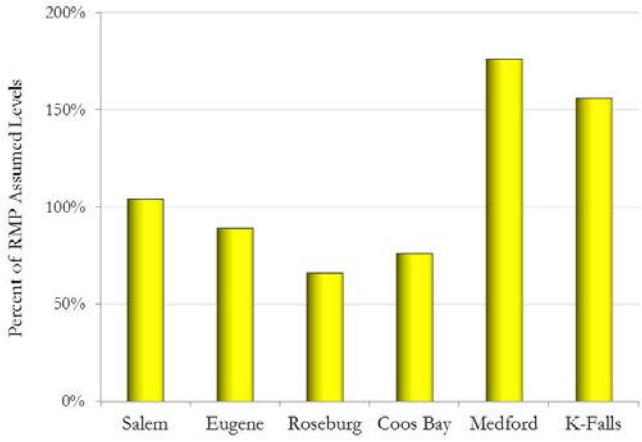
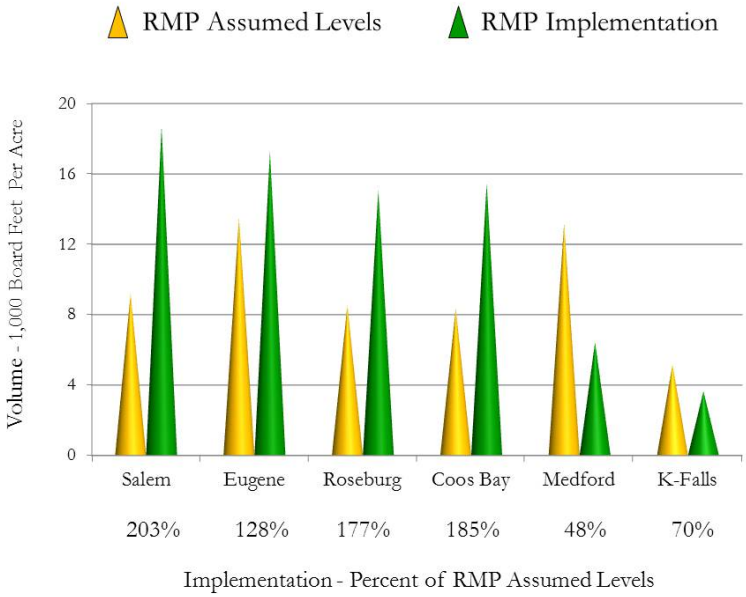


Figure 5. ASQ Thinning Sale Volume per Acre – Fiscal Years 1995 – 2010.

- ASQ thinning sale volume per acre exceeded RMP assumed levels in the Salem, Eugene, Roseburg, and Coos Bay Districts.
- ASQ thinning sale volume per acre was less than RMP assumed levels in the Medford District and Klamath Falls Resource Area.



Changed circumstances and new information have led to the departure of the sold timber sale volume from the harvest land base compared to the assumptions used to determine the declared ASQ. This departure is similar in nature to the departure described in the 2004 plan evaluations. The changed circumstances and new information that have led to this departure include:

- In 2008, the U.S. Fish and Wildlife Service designated new critical habitat for the northern spotted owl. Sustained-yield timber management on approximately 10% of the harvest land base is precluded as a result of this new designation.

- Management of Survey and Manage sites in the harvest land base was not considered in the determination of the ASQ.

- Marbled murrelet sites continue to be identified in the harvest land base, which results in re-designation of harvest land base acres to Late-Successional Reserves.

- The BLM has attempted to minimize effects on northern spotted owls and their habitat within northern spotted owl home ranges. This has caused the BLM to generally avoid timber harvest within these home ranges in the harvest land base.

- The BLM has generally avoided timber harvest on lands in the harvest land base which are likely to have marbled murrelet sites or occurrences of certain survey and manage species because of the survey workload and anticipated effects of species occurrence on sale viability.

- The BLM has generally avoided regeneration harvest, especially regeneration harvest of older forest. This has implications for the sustainability of timber harvest and has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Individual tree mortality is persistent in portions of the Medford District and all of the Klamath Falls Resource Area. The need for forest health treatments to reduce stocking and to improve resiliency has led to an emphasis on thinning treatments and a de-emphasis on regeneration harvest. This is a different mix of harvest than anticipated by the 1995 RMP and determination of the ASQ.

The O&C Act requires that the annual productive capacity be determined and declared. The ASQ is based on the capacity of the lands allocated to sustained yield objectives to produce timber at a level that will remain constant over time. The General Forest Management Area, Adaptive Management Areas, and Connectivity Diversity Blocks (harvest land base) are the lands allocated for this purpose under the 1995 RMPs. The assumptions for the cycle, intensity, and harvest methods determine the sustainable harvest level from these lands. In simplistic terms, the sustained yield reflects a harvest rate that is in balance with forest growth on the harvest land base.

The current approach to a forest management regime that deviates so considerably from the RMP assumptions used in determination of the ASQ is not sustainable at the declared ASQ level due to the reasons described below.

- The determination of the ASQ is based upon an assumed; mix, intensity and cycle of regeneration and thinning harvest. Adherence to the principles of sustained yield, at the declared ASQ harvest level, is based on implementation of these assumptions.

- The reduced levels of regeneration harvest sales and acceleration of thinning from the harvest land base has been a long-term trend since 1999. Regeneration harvest of mature forest is the primary source of volume for the declared ASQ.

- Regeneration harvest conducted today provides the stands available for thinning in the future. Inability to implement regeneration harvest reduces thinning opportunities in the future.

- Higher levels of harvest volume per acre with thinning will affect future yields.

- Accelerated rates of thinning without replenishment of younger forest stands through regeneration harvest means that opportunities for thinning will eventually be exhausted.

The levels of silvicultural and other land management treatments are directly affected by the timber harvest activities which are implemented under the RMP. For example, following a regeneration harvest there may be site preparation conducted prior to re-forestation. Seedlings may require protection measures to ensure survival and growth rates. Early forest stand conditions may require thinning of trees and management of competing vegetation to achieve desired numbers and patterns of trees with in a stand. The RMP provided estimated levels of silvicultural treatments that would occur as a result of implementation of the ASQ. These were estimated levels but not management decisions. Given the substantial departures from the RMP assumptions for ASQ harvest, a detailed review of levels of silvicultural activities was not completed. Generally, the levels of silvicultural activities have been less than estimated in the 1995 RMPs.

There is new information regarding the sustainable harvest levels and the potential harvest volume from the Late-Successional and Riparian Reserve allocations under the 1995 RMPs.

The 2008 FEIS evaluated the volume potential utilizing current inventory and improved mapped data on land use allocations, particularly lands in Riparian Reserves. The 2008 FEIS analysis of continued implementation of the 1995 RMP (i.e., the No Action alternative in the 2008 FEIS) indicated the sustainable harvest levels are actually higher than described in the 1995 RMPs if the BLM were to implement the mix, intensity and cycle of regeneration and thinning harvest assumed in the 1995 RMPs.

Figure 6. 1995 RMP Declared ASQ and 2008 FEIS Estimated Sustainable Harvest Level.

	Salem	Eugene	Roseburg	Coos Bay	Medford	Klamath Falls	W. Oregon Total
Current Declared ASQ	35	33	45	27	57	6	203
2008 EIS Sustainable Harvest Level	41	58	56	48	59	6	268

Harvest is allowed, for reserve land objectives, within Late-Successional and Riparian Reserves. The BLM did not assess the potential harvest volume from the reserve allocations, hardwood conversion, or reserve salvage after stochastic events in the 1995 RMPs. This timber sale volume does not contribute to the ASQ because it is not a sustainable harvest source for the long term. For the evaluation period (2004-

2010), this non-ASQ harvest for the six districts combined has averaged 71 million board feet annually.

The 2008 FEIS analysis estimated a potential of 87 million board feet harvest annually from the reserved land use allocations in the first decade. This potential harvest would then subsequently decline to less than 60 million board feet for the next 20 years.

The 2008 FEIS evaluated the volume potential for managing 146,000 acres of the Medford district under an uneven age management approach (2008 RMP) which indicated a sustainable harvest level of 28 million board feet. This same uneven aged management approach applied to Klamath Falls Resource Area indicated a 5 million board foot sustainable harvest level. The uneven age approach analyzed relies on a variety of density management treatment with patch openings. The uneven age management approach had both timber and improvement of forest resiliency as objectives.

A plan revision is needed to address the changed circumstances and new information that has led to a substantial, long-term departure from the timber management outcomes predicted under the 1995 RMPs.

Survey & Manage

The 1995 RMPs were amended by the January 2001, Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines in Forest Service and Bureau of Land Management Planning Documents within the Range of the northern spotted owl.

In March 2004, the BLM completed a supplemental environmental impact statement and issued a record of decision to remove the survey and manage mitigation measure. The U.S. District Court for the Western District of Washington found the Record of Decision invalid since it relied on a supplemental environmental impact statement that the Court found deficient. In 2006, the Court issued an order of relief which allowed the BLM to eliminate the survey and manage requirement for four types of activities, commonly called the “Pechman Exemptions.”

Another interagency supplemental environmental impact statement was prepared to address deficiencies in the 2004 supplemental environmental impact statement. The BLM issued a record of decision in July, 2007 to amend the plans within the Northwest Forest Plan area to remove the survey and manage mitigation measure.

In January 2008, a lawsuit was filed, and in December 2009, the presiding judge issued an Order granting Plaintiffs motion for partial summary judgment. The judge found that the SEIS violated NEPA due to a lack of a true no action alternative; lack of new information warranting elimination of Survey and Manage; and lack of high-

quality information and accurate scientific data related to fire and fuels treatments, costs, and species data.

A settlement agreement between the parties was approved by the court on July 6, 2011. The agreement stipulates that projects within the range of the northern spotted owl are subject to the survey and management standards and guidelines in the 2001 Record of Decision without subsequent 2001-2003 Annual Species Reviews as modified by the 2011 Settlement Agreement. The Settlement Agreement modifies the 2001 Survey and Manage species list; establishes a transition period for application of the species lists; acknowledges existing exemption categories (2006 Pechman Exemptions); and, establishes exemptions from surveys for certain activities. The settlement agreement is in effect until the BLM conducts further analysis and decision making pursuant to the National Environmental Policy Act and issues a record of decision to supersede the Survey and Manage mitigation measure.

The 2008 RMP revision did not include management objectives or direction for Survey and Manage Species.

A plan revision would provide an opportunity to determine whether to retain, modify, or eliminate the Survey and Manage mitigation measure.

Wildlife including Special Status Species

Northern Spotted Owl

Forsman et al (2011) published a report on the latest population demography of northern spotted owls that indicates northern spotted owl survival and recruitment continue to decline at a rate greater than predicted in the Northwest Forest Plan. Barred owls are likely a significant factor affecting survival but the amount and configuration of habitat may also continue to adversely affect survival and recruitment.

The U.S. Fish and Wildlife Service completed a new recovery plan for the northern spotted owl in June 2011. The recovery plan retains with some revision language, Recovery Action 32 from the 2008 recovery plan. Recovery Action 32 recommends maintaining and restoring older and more structurally complex multi-layered conifer forests. Recovery Action 10 is new and is intended to result in greater demographic support from the Matrix by recommending the conservation of northern spotted owl sites and high value northern spotted owl habitat.

The 1995 RMPs contain management objectives and direction to manage BLM-administered lands to promote the recovery of listed species and to comply with approved recovery plans. However, implementing the recommendation from these two recovery actions will be likely to further reduce timber harvest volume in support of the Annual Sale Quantity in the Matrix land use allocation compared to the volume anticipated under the 1995 RMPs. The 2008 RMP's Deferred Timber Management Areas were intended to address the 2008 Recovery Plan Recovery Action 32.

Recovery Action 10 was not present in the 2008 recovery plan and thus the 2008 RMP did not incorporate it.

The U.S. Fish & Wildlife Service also intends to revise critical habitat for the northern spotted owl. The U.S. Fish & Wildlife Service issued a draft designation in March 2012 and is under a court ordered deadline to complete final designation by November 2012. The U.S. Fish & Wildlife Service used modeling to guide assessment of different configurations and quantities of critical habitat. The 2008 boundaries and Primary Constituent Elements[1] remain in effect until such time as final revised designation is made. The 2008 critical habitat boundaries do not overlap entirely with the Northwest Forest Plan Late Successional Reserves and thus some portions of the matrix are designated as critical habitat, similar to the 1992 critical habitat designation and Late Successional Reserves. Land management in those areas is required to avoid activities that would result in the destruction or adverse modification of critical habitat. The 2008 RMP Late Successional Management Areas corresponded with the 2008 critical habitat boundaries and would have retained the primary constituent elements.

New information from the 2008 RMP FEIS shows that the 1994 RMP EIS contains outdated analysis relative to the development of suitable habitat for the northern spotted owl.

- The 1994 RMP EIS assumed that all Late Successional Reserves eventually develop into large blocks of suitable habitat. The 2008 RMP FEIS showed that large blocks developed at highly disparate rates, and some large blocks are incapable of developing as anticipated in 1994 (2008 FEIS, Pages 645 – 657).

- The 1994 RMP EIS assumed there would be an absence of suitable habitat within the matrix in the future. The 2008 RMP FEIS showed this is not the case (2008 FEIS, Volume II, Pages 599 -603).

<u>Marbled Murrelet</u>
The 1995 RMPs require marbled murrelet surveys in Zone 1 and Zone 2 using protocols "currently used by Federal agencies." The U.S. Fish & Wildlife Service has issued technical guidance recommending that surveys in areas outside of the hemlock/tanoak habitat zone (as defined in Alegria et al [2002]; the majority of the Medford District) be discontinued (USFWS 2002). In 2003, the Pacific Seabird Group developed revised survey protocols (Evans Mack et al 2003) that adopt the technical guidance from the U.S Fish & Wildlife Service (i.e. surveys in areas outside the hemlock/tanoak zones are not necessary for consultation).

[1] Primary Constituent Elements are those physical and biological features essential to the conservation of the species. Typically they are the structural features (e.g. age and type of vegetation) and their location in space that provide habitat components for the listed species and are generally considered limiting to the species.

The revision to marbled murrelet critical habitat was completed in October 2011. The revision removes approximately 189,671 acres of forest land in northern California and southern Oregon not associated with the hemlock/tanoak habitat zone from the 3,887,000-acre 1996 critical habitat designation. As most of the marbled murrelet critical habitat is also northern spotted owl habitat and current critical habitat is entirely within Late Successional Reserve boundaries, this likely would have only minimal effects on implementation of management actions under the 1995 RMPs.

The recovery plan notes that in southern areas, marbled murrelet use of the Zone 2 area (>35 miles from the coast) is very low or non-existent. The revised critical habitat designation removes areas in southern Oregon and Northern California that are not associated with the hemlock/tanoak habitat zone. Districts in these areas should review the requirement for surveys in Zone 2 after working with the U.S. Fish & Wildlife Service.

The 2008 RMP continued the survey requirements from the Northwest Forest Plan but adopted the 2003 Pacific Seabird Group revised survey protocol (Evans Mack et al 2003) which excludes the areas outside the hemlock/tanoak zones from the suggested survey areas based on the U. S. Fish & Wildlife Service technical guidance.

Western Snowy Plover

The listed populations of western snowy plover are limited to the Coos Bay District. Nesting habitat in coastal dune areas managed by BLM was designated as critical habitat in 2005. In March 2011, the U.S. Fish & Wildlife Service announced a proposal to revise critical habitat for the western snowy plover. A recovery plan was published in 2007. Areas where snowy plovers occur are managed under the "The Coos Bay Shorelands Final Management Plan" (1995), and the "New River Area of Critical Concern Management Plan" (1995). The critical habitat designation primarily effects recreation access and use, and has no effect on timber management.

Red-Tree Vole

The U.S. Fish & Wildlife Service determined that the Northern Oregon Coast distinct population segment of red tree vole was Warranted, but Precluded for listing on October 12, 2011. The Northern Oregon Coast distinct population segment (DPS) occurs in the western parts of the Eugene and Salem Districts. This determination does not impose any regulatory requirements under the Endangered Species Act. The Warranted, but Precluded finding assigned a listing priority of 9 (out of 12) to the red tree vole. The listing document states that "existing regulatory mechanisms" (primarily the 2001 Survey and Manage Standards and Guidelines as modified by the 2011 Settlement Agreement) on federal lands are adequate to provide for the conservation of the North Oregon Coast DPS of the red tree vole. An RMP revision would provide an opportunity to review existing management direction.

Vernal Pool Fairy Shrimp

Critical habitat for vernal pool fairy shrimp was designated in 2005 (with administrative revisions in 2006). Approximately 320 acres in the Table Rock area

managed by the BLM Medford District were designated as critical habitat under the final rule. Timber management is unlikely to impact or be impacted by critical habitat. Recreation development and maintenance, off-highway vehicle use, road construction and maintenance, grazing, noxious weed treatment, and mineral development may be influenced by the designation. A recovery plan was published in 2005 and encourages protection of vernal pool habitat in Table Rock area.

Siskiyou Mountain Salamander, Mardon Skipper, and Pacific fisher

The Mardon skipper and Pacific fisher are candidate species that are Warranted, but Precluded for listing. In 2007, the Medford BLM District and Rogue River-Siskiyou National forest completed a Conservation Strategy and a Conservation Agreements for the Siskiyou Mountain salamander and a Conservation Assessment for the Mardon skipper. The Conservation Assessment for the Mardon skipper was updated in 2011. These documents modify on-the-ground management by providing site protection/management for many species locations in order to conserve the species and avoid listing. Implementation of the Conservation Strategy and Conservation Agreement for the Siskiyou Mountain salamander is likely to impact accomplishment of timber and fuels objectives. The Conservation Assessment for the Mardon skipper would only affect grasslands. The Conservation Assessment for the Mardon skipper may impact grazing activities but is unlikely to impact timber and fuels activities.

In 2007, the west coast population of the fisher was determined to be a candidate species for federal listing as threatened or endangered. The 2008 RMP revision did not provide specific management direction related to the fisher.

Fender's blue butterfly

Final critical habitat has been designated for the Fender's blue butterfly. The designation includes BLM lands but primarily overlays prairie and open oak savannah. Timber management is unlikely to impact or be impacted by critical habitat. Recreation development and maintenance, off-highway vehicle use, road construction and maintenance, grazing, and noxious weed treatment may be influenced by the designation.

Townsend's big-eared bats (and all cave-dwelling bats)

White nose syndrome threatens bats east of the Mississippi River. It is a potential threat within Oregon and Washington. The 1995 RMPs do not contain management direction pertaining to white nose syndrome. A plan revision would provide an opportunity to consider new management direction for this issue.

Golden Eagles and Migratory Birds

There have been several new national policy requirements related to golden eagles and migratory birds. These new policies mostly affect project level planning and National Environmental Policy Act analysis but also have some relevance to RMP-level planning.

- *WO IM 2010-156, Bald and Golden Eagle Protection Act, Golden Eagle National Environmental Policy Act and Avian Protection Plan Guidance for Renewable Energy.*

  The guidance directs the BLM to require best management practices that avoid or minimize the possibility of unintentional take of golden eagles to projects where appropriate as a condition of the right-of-way grant until Advanced Conservation Practices are developed and implemented. If the proposed project has the potential to impact golden eagles or their habitat, an avian protection plan will be required by the BLM as a condition of the right-of-way grant. The avian protection plan will be developed by the applicant, in coordination with the U.S. Fish & Wildlife Service and the BLM, to evaluate options to avoid and minimize project impacts. The U.S. Fish &Wildlife Service issued a Draft Eagle Conservation Plan Guidance in February 2011. Recommendations contained in this guidance should be considered in project planning in a future planning effort as appropriate.

  Nine of the eighteen counties west of the Cascades have documented golden eagle territories. A plan amendment or revision would provide an opportunity to review golden eagle inventories and the need for new management direction for golden eagles in light of this new policy.

- *WO IB 2010-110: Memorandum of Understanding between the BLM and U.S. Fish and Wildlife Service to promote the conservation of migratory birds.*

  This bulletin transmits the final National memorandum of understanding between the BLM and the U.S. Fish & Wildlife Service. The memorandum of understanding is intended to strengthen migratory bird conservation efforts by identifying and implementing strategies to promote conservation and reduce or eliminate adverse impacts on migratory birds through enhanced collaboration between the BLM and the U.S. Fish & Wildlife Service, in coordination with State, tribal, and local governments. The memorandum of understanding commits the BLM to certain actions and analysis that should be done at the RMP level.

  A plan amendment or revision would provide an opportunity to consider the inclusion of management objectives and direction to conserve migratory birds. The 2008 RMP revision did not contain specific management objectives or direction for migratory birds but it did assess the impacts of the alternatives on land birds.

Snags

The 1995 RMPs includes a provision to at a minimum retain sufficient snags to maintain 40% of potential population levels of cavity-nesting birds within harvest units. Several reviews and evaluations have called the efficacy of this prescription into question (e.g. Rose et al 2001). Models that allow landscape evaluations and

planning for snag densities have been improved and are in use by other agencies (e.g. DecAid Advisor).

The 2008 FEIS used a different metric to assess potential population levels (tolerance intervals) but would have generally resulted in retention of similar levels of snags on about 75% of BLM land as the Northwest Forest Plan provides but would have provided no snag retention requirement for the remaining 25%.

Elk

The key to elk survival and reproduction is nutrition (Cook et al. 1998, Cook et al. 2004b). Thermal cover has a much more limited role than previously believed and in some cases can be detrimental (Cook at al. 2004a). The U.S. Forest Service Pacific Northwest Research Station and partners developed a west side elk nutrition model in response to this new information. Results from the model could be used to inform landscape scale planning. Modeling may show that the effects of management actions on elk are different than analyzed in the 1994 RMP/EIS.

Forest Disturbance

Understanding of the effects and influence of human management on forest disturbance agents (e.g. fire, insects, and climate) has increased since the1995 RMPs. Discussions on methods to restore/mimic natural disturbance process scale and intensity in order to maintain healthy and sustainable ecosystems have moved from the theoretical to applied, particularly in those areas most altered by past management and historically maintained by high-frequency, extensive disturbances such as fire in dry forest communities.

Rates intensity and location of forest disturbance relative to northern spotted owls may be different than expected in the1995 RMPs. Davis et al (October 2011, Northwest Forest Plan Status and Trends of Northern Spotted Owl Populations and Habitats From 1994 to 2008) estimated northern spotted owl habitat loss from harvest, fire, and disease for the period between 1994-97 and 2006-07. The 1995 RMPs expected losses of up to 5 percent per decade, with a loss of 2.5 percent from timber harvest and 2.5 percent from wildfire. Actual observed range wide loss of habitat from all disturbances was estimated at approximately 3.4%. Wildfire caused approximately 2.7 percent of the habitat loss, with harvest accounting for 0.6 percent, and insects and disease 0.1 percent. This is within the estimated range of loss in the1995 RMPs, but it should be noted that the majority of loss from fire occurred in reserves, loss was 5% or greater in some reserve areas of southern Oregon, and more than 600,000 acres were lost from fire in southern Oregon after the end of the analysis period. The 1995 RMPs' strategy assumed that losses would occur within the reserves but if rates exceed those predicted or are occur at greater rates in certain areas than predicted, the amount and distribution of habitat in may vary significantly from the1995 RMPs. Future plans will have to consider spatial context of the reserve system and the disproportionate rate of loss from fire that occurs in the southern areas.

Surveys for Northern Spotted Owls and Special Status Species

Comprehensive inventories of spotted owls are dated (with the exception of the Klamath Falls Field Office). Districts vary in their approach to owl surveys. Most units use a combination of surveys and The Methodology for Estimating the Number of Northern Spotted Owls Affected by Proposed Federal Actions (USFWS, BLM, USDA FS 2008; AKA OEM; the "owl model") for enumerating potential "take" of owls to facilitate consultation under section 7 of the ESA. Future planning should consider the utility and efficiency of a more intensive survey effort and alternative modeling efforts to capture owl data and better inform alternative development.

Comprehensive inventories of some terrestrial Special Status Species (SSS) have not been conducted due to limited funding or staff. The Interagency Special Status Species Program continues to make strides in developing conservation assessments, strategic surveys, and tools that improve our ability to estimate population status based on habitat conditions and are more useful for planning purposes.

Botany Including Special Status Species

A plan revision would provide an opportunity to incorporate information from new recovery plans and critical habitat designations for a number of botanic species listed under the Endangered Species Act.

Federally Listed Plants

- Cook's desert parsley was federally listed as endangered in 2002. A draft recovery plan for Cook's desert parsley was issued in 2006 and critical habitat designations were made in 2010. The critical habitat designations include BLM-administered lands in the Illinois valley in wet meadows, oak woodlands and mixed evergreen forest. Timber management, and fuels treatments are not likely to be substantially affected, but recreation, off-highway vehicle use, noxious weed treatments, and mining actions could be affected. There are active mining claims within critical habitat and within existing populations. Surface Management regulations (43 CFR 3809.402(b)(7)) require operators to prevent adverse impacts to federally listed species. A draft recovery plan was created for the large-flowered wooly meadowfoam in 2006 and critical habitat was designated in 2010 with Cook's desert parsley. Large-flowered wooly meadowfoam has not yet been found on BLM-administered lands, and critical habitat was not designated on BLM lands. The new information for Cook's desert parsley and large-flowered wooly meadowfoam could be addressed with plan maintenance, amendment or revision. The 2008 ROD/RMP incorporated information about the recovery plans but not the critical habitat for these two species.

- Bradshaw's desert parsley was listed as endangered in 1988, Nelson's checkermallow was listed as threatened in 1993, and Willamette daisy (endangered) and Kincaid's lupine (threatened) were listed in 2000. A final recovery plan was issued in 2010 for prairie species of western Oregon and southwestern Washington, including Willamette daisy, Bradshaw's desert

parsley, Kincaid's lupine, and Nelson's checker-mallow. Critical habitat was designated in 2006 for Kincaid's lupine and Willamette daisy. Critical habitat for Bradshaw's desert parsley and Nelson's checkermallow has not been designated. In the Roseburg District, the BLM, Forest Service, private parties, and USFWS entered into a conservation agreement in 2008 that precluded designation of critical habitat in Douglas County for Kincaid's lupine.

The 2008 RODs/RMPs did not address the 2010 recovery plan for the prairie species. The new information for these species could be addressed with plan maintenance, amendment or revision. The final critical habitat designation includes BLM lands but primarily overlays prairie and open oak savannah. Timber management is unlikely to impact or be impacted by critical habitat or recovery plan guidance. Recreation development and maintenance, off-highway vehicle use, road construction and maintenance, grazing, prairie and oak savannah restoration, and noxious weed treatment may be influenced by the designation.

- There is new information for Gentner's fritillary. Pre-project surveys have documented a number of significant sites, especially in dry mixed evergreen plant communities in southern Oregon where timber sales, fuels treatments, and woodland restoration actions are proposed. Because of the small area of occupied habitat, effects to annual sale quantity for timber or fuel treatment acres are likely insignificant. However, recreation, off-highway vehicle use, road construction, (including rights–of-way authorizations), and grazing, are likely to be affected. Fuels treatments and oak woodland restoration projects could benefit the species. Recovery actions have accelerated since 2004, and include augmentation of existing sites, and out-planting into unoccupied suitable habitat. The new information for this listed endangered lily could be addressed with plan maintenance, amendment or revision. Critical habitat has not been designated for Gentner's fritillary.

- Western lily was federally listed in 1994, and recovery plan was issued in 1998. Critical habitat was not issued. The primary long-term natural threat to western lily is competitive exclusion by shrubs and trees as a result of succession in bogs and coastal prairie/scrub. Human activities such as clearing and draining of wetlands, development of cranberry agriculture, urban development pressure, and alteration of natural hydrological processes are also major factors. Timber management, and fuels treatments are not likely to be affected and existing mitigations protecting bogs and coastal prairie should protect the habitat. The 2008 RMP addressed Western lily and the recovery plan which calls for augmenting existing populations. Any new information could be addressed with plan revision or amendment.

- Rough popcorn flower was federally listed in 2000 and a Recovery plan was issued in 2003. Critical habitat was not issued. The rough popcornflower is

highly threatened by direct loss of habitat from conversion to urban and agricultural uses, hydrological alterations, and fire suppression. Timber management is unlikely to have any effect on the species; however other threats to the species include roadside mowing, spraying, and competition with non-native vegetation. The 2008 RMP addressed Rough popcorn flower and the recovery plan which calls for augmenting existing populations. Any new information could be addressed with plan revision or amendment.

Sensitive Species

In 2005 the BLM and US Forest service created the Interagency Special Status Sensitive Species Program, which jointly works together on special status species. This group fundamentally changed the way sensitive species are listed, and created a whole new set of criteria and process. The Oregon BLM did away with 'assessment' and 'tracking' species and went to a process that tiers off the Oregon Natural heritage listing process, into two categories of 'sensitive' and 'strategic'. Only sensitive species are managed on the ground, but data is collected on strategic species. This change resulted in a net reduction in the number of sensitive plant species that are required to be conserved and managed, and a net reduction in the number of acres in no-disturbance buffers. The list was updated in 2005, 2008, and 2011. The species list changes can be addressed through plan maintenance.

Native Seed

The Oregon/Washington BLM has a policy regarding the use of native species to reseed disturbed areas. The 1995 RMPs do not contain management direction regarding the use of native species. The 2008 RODs/RMPs incorporated this new policy.

New BLM policy (via rule-making) was issued in 2011 for the use of weed-free hay/straw/mulch. All hay, hay cubes, straw, grain, and other crop or mulch products brought on to BLM lands in Oregon and Washington must be certified "weed free" using North American Weed Management Association (NAWMA) standards, or better, regardless of how they are used (livestock feed, bedding, erosion control, mulch, etc.).

Since 2004, a national BLM initiative called Seeds of Success has funded the collection of hundreds of species for restoration and for long term storage for future use in case of catastrophic events. This program has resulted in the annual production of tons of native seed for use in restoration and rehabilitation of BLM lands. Native seed production and native seed use can be addressed under plan maintenance or RMP revision.

Vegetation Management in Dry Forests

The 2011 Revised Recovery Plan for the northern spotted owl discusses at length the desirability of vegetation management within the range of the northern spotted owl that restores ecological processes and improves the resistance of existing natural vegetation communities to fire and other disturbances. Recovery Actions 7 and 9

creates interagency work groups to assist land managers in developing landscape-level recovery strategies for dry forest management.

An RMP revision would provide an opportunity to review and revise existing RMP objectives and direction in the dry-forest, fire-adapted ecosystem of southwestern Oregon to develop forests that are resilient to disturbances and long-term climate trends, to provide for species conservation, and to provide forest products.

Invasive Species and Noxious Weeds

Executive Order 13112 of February 3, 1999, requires agencies to use relevant programs and authorities to prevent the introduction of invasive species. Invasive species are any alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health. The 1995 RMPs address noxious weeds, but not other invasive species. The 2008 Western Oregon Plan Revision addressed invasive plants (includes noxious weeds, but not other taxa). A plan revision would allow the BLM to develop desired outcomes for management of invasive species including aquatic species, animals, insects, pathogens as well as plants.

There have been recent programmatic Environmental Impact Statements and Records of Decision pertaining to vegetation management and herbicide use. They include:

- *Record of Decision for the Vegetation Treatments Using Herbicides on BLM lands in 17 Western States Programmatic Environmental Impact Statement, 2007.*
- *Record of Decision for the Vegetation Treatments Using Herbicides on BLM Lands in Oregon Environmental Impact Statement, 2010.*

These new decisions do not conflict with 1995 RMP direction but they do provide updated standard operating procedures and new mitigation measures that will be incorporated into project planning and any future plan revision. The 2007 and 2010 Records of Decision authorize the use of herbicides for plants other than noxious weeds. The 2010 Record of Decision would allow herbicide use on native and non-native plants for safety and infrastructure protection, Rights of Way, Administrative Sites, and Special Status Species habitat improvements. However, the primary use of herbicides would still be for noxious weeds and invasive plant control. The 1987 SEIS Record of Decision limited herbicide use to noxious weed control. The 2010 Record of Decision lifted the herbicide injunction that limited BLM to 4 herbicides for spot control of noxious weeds only.

Plan maintenance should be used to describe the use of the 2007 and 2010 Records of Decision. Additionally, the environmental impact statements should be used for tiering purposes during project National Environmental Policy Act compliance. The 2010 Record of Decision does not authorize any on-the-ground projects. The BLM is currently in the process of "stepping-down" the statewide EIS in site-specific

analyses (Environmental Assessments) that would allow use of these herbicide tools for each of the nine Oregon BLM districts. The 2007 Programmatic PEIS was incorporated into the 2008 Western Oregon Plan Revision.

A January 22, 2004, ruling pertaining to a recent lawsuit (Washington Toxics Coalition vs. EPA) requires buffers for certain pesticides near fish bearing streams containing endangered and threatened species. Noxious weed control is exempt, but only under certain conditions. These are more restrictive measures than appear in the 1995 RMPs (no buffers are required). Districts have incorporated this requirement into project planning. The 2008 RMP revision did not specifically address buffer zones for pesticide applications.

Biomass

There has been an increasing regional and national emphasis on the use of woody biomass as both a value-added woody product and an alternative energy source as evidenced by numerous state and federal initiatives, policies, and laws. Among these are:

- *Forest Health & Biomass Energy Transition Team Recommendations to Governor Kitzhaber.*

  The team was developed to foster the growth of a bio-energy industry in Oregon, beginning with woody biomass. The 2011 recommendations address opportunities for increasing the demand for woody biomass in the state of Oregon. The recommendations include increasing federal forest biomass harvests.

- *Secretarial Order No. 3285, Renewable Energy Development by the Department of the Interior.*

  This Order was issued in 2009 and established the development of renewable energy as a priority for the Department of the Interior and established a task force on Energy and Climate Change to develop a strategy to increase the development and transmission of renewable energy including biomass energy.

- *The Food, Conservation, and Energy Act of 2008*

  This law promoted biomass crop production and enacted the Biomass Crop Assistance Program.

- *The Energy Policy Act of 2005.*

  This law provided tax incentives and loan guarantees for energy production of various types including biomass. It provided $50 million annually for biomass grants.

- *IM WO-2005-160, Bureau of Land Management Biomass Utilization Strategy.*

  The IM established comprehensive definitions for biomass and biomass utilization, establishes performance measures and guidelines for counting and tracking biomass accomplishments, and implemented the Department of the Interior contract clause for biomass removal.

There are new scientific reports on the environmental effects of biomass removal on soil productivity, the carbon cycle, wildlife habitat, forest health, and wildfire risk. Additionally, an increasing number of studies concerning the social and economic impacts of biomass utilization are available. A synthesis of the scientific studies is needed to help Districts address the effects of biomass removal during project level National Environmental Policy Act compliance.

The 1995 RMPs lack explicit decisions regarding biomass. Explicit objectives and management direction that allows material from harvesting actions, silvicultural treatments, and forest health and fuels treatments to be used for biomass utilization would facilitate program implementation and BLM's ability to meet departmental mandates for development of renewable energy. A plan amendment or revision would provide an opportunity to establish management objectives and direction and to incorporate new scientific studies into an RMP effects analysis. The 2008 RMPs included management direction for biomass.

Fisheries

There have been new or changed threatened or endangered species listings, designations of critical habitat, and recovery planning efforts for fish species in western and southern Oregon. These include the Lower Columbia River Chinook salmon, Upper Willamette River Chinook salmon, Columbia River chum, Southern Oregon/Northern California coast Coho salmon, Lower Columbia River Coho salmon, Oregon coast Coho salmon, Lower Columbia River steelhead trout, Upper Willamette River steelhead trout, Southern Green sturgeon, Oregon chub, bull trout, and the southern Distinct Population Segment of the Pacific eulachon). The 1995 RMPs provide management objectives and direction to design and implement fish habitat restoration and enhancement activities that would benefit these species. However, it would be beneficial to re-examine the type of activities and the priorities for these activities in light of the new listings, recovery plans, and designations of critical habitat. All of these changed or new listings were considered in the 2008 RMP revision except for the Southern Green sturgeon and the Pacific eulachon.

The Pacific Fishery Management Council and NOAA Fisheries published a draft review of Pacific salmon essential fish habitat in October 2011. Since most BLM lands in western Oregon are within essential fish habitat, the final review and recommendations resulting from the review may affect management of BLM-administered lands in western Oregon.

The 2008 RMP FEIS analyzed how BLM's ability to influence aquatic fish habitat and fish populations varies with the amount and location of BLM ownership in a watershed, the limiting habitat factors for fish populations, and the intrinsic potential of streams to support fish populations. The analysis showed that of all the riparian and aquatic conditions affecting fish productivity, increasing large wood and habitat complexity would have the greatest benefit. Under the 1995 RMPs, key watersheds were identified as areas crucial to maintaining and recovering habitat for at-risk fish stocks. Key watersheds have the highest priority for watershed restoration. The network of key watersheds does not match well with streams with high priority fish populations and a high intrinsic potential for fish. These concepts from the 2008 FEIS could be used to develop new riparian management direction and restoration priorities in a future plan revision.

Comprehensive, detailed fish distribution surveys would improve project implementation and National Environmental Policy Act compliance by providing a more accurate baseline for effects analysis and Endangered Species Act consultation. These surveys would also be useful in future RMP amendments or revisions.

Aquatic Conservation Strategy

In 2001, in PCFFA v. NMFS (PCFFA II), the United States Court of Appeals for the Ninth Circuit affirmed Judge Rothstein's ruling in PCFFA I. The Court interpreted the language in the Aquatic Conservation Strategy to mean that projects must achieve all Aquatic Conservation Strategy objectives at the watershed and project scale and in the short- and long-term.

Confusion related to the existing language was seen as hindering federal land managers' ability to plan and implement projects needed to achieve Northwest Forest Plan goals. In 2004, the USFS and BLM completed a plan amendment to change the wording of the Aquatic Conservation Strategy to clarify the proper scale to evaluate progress toward achieving Aquatic Conservation Strategy objectives is the fifth-field watershed and broader scales.

In 2007, in PCFFA v. NMFS, et al (PCFFA IV), the District Court for the Western District of Washington set aside the Biological Opinions, the Final SEIS, and the Aquatic Conservation Strategy Amendment. As a result of PCFFA IV, districts document consistency with the Aquatic Conservation Strategy objectives at the watershed and project scale and in the short- and long-term.

The BLM in western Oregon is rarely the predominant landowner within a fifth field watershed. Analysis completed as part of the 2008 RMP revisions showed that over half of BLM lands in western Oregon are located in watersheds where BLM-administered lands comprise less than a third of the watershed. As a result of this ownership pattern, the BLM can only partially influence aquatic and riparian outcomes at the watershed scale.

A plan amendment or revision would provide an opportunity to review management objectives and direction for aquatic resources in light of the Aquatic Conservation Strategy litigation, implementation issues, and land ownership patterns described above. The 2008 RMP incorporated a revised riparian strategy with new management objectives and direction.

Roads, Access, Rights-of-Way

WO-IM-2008-14, Clarification of Guidance and Integration of Comprehensive Travel and Transportation Management Planning into the Land Use Planning Process, was issued in October 2007. A key aspect of the policy is a requirement for all resource programs to work in an interdisciplinary manner in planning, determining, and managing the transportation network to best meet the full range of public, resource management, and administrative access needs. Key requirements include:

- Comprehensive Travel and Transportation Management planning should address all resource and administrative access needs not just motorized or off-highway vehicle recreational use activities.

- The planning process should address the full range of various modes of travel on public lands, not only motorized access needs.

- The selection of travel management areas should parallel identified Recreation Management Zones within Special Recreation Management Areas.

- Within Extensive Recreation Management Areas, travel management actions are limited to care-taking and custodial management objectives.

- Comprehensive Travel and Transportation Management planning will be incorporated into development of all RMPs to ensure access needs are balanced with resource management goals and objectives.

- Off-highway vehicle designations of "open," "limited," and "closed" should be compatible with planning goals and objectives. Generally, the BLM will designate limited areas where use is limited to identify existing roads and trails or emphasize the designation of travel and transportation networks. The designation of large areas that remain open to unregulated "cross-country travel" is no longer a viable management strategy.

- Identification of travel management areas, decisions, and a resulting transportation system should be performed concurrently with determination of off-highway vehicle area designations as part of the planning process. This includes establishing a process to identify, evaluate, and select specific routes available for motorized uses within the areas designated as limited to off-highway vehicle use and specify limitations or restrictions on type, duration, and season of uses or modes of transportation allowed.

- If Comprehensive Travel and Transportation Management is not completed concurrently with land use planning, field offices may complete travel and transportation planning as separate implementation plans. Plans should be completed within 5 years from completion of RMP.

A Plan revision or amendment would be required to incorporate this new policy into the 1995 RMPs. The 2008 RMP revision incorporated the new policy on off-highway vehicle designations but not the other new policy items noted above. The 2008 RMP revision did not include comprehensive travel and transportation planning.

Additionally, districts have not yet completed Comprehensive Travel and Transportation Management plans as required within 5 years of completing the RMPs although some efforts are currently underway. Comprehensive Travel and Transportation Management would improve the districts' ability to achieve RMP objectives for travel management.

The BLM-administered lands in western Oregon are predominantly intermingled in a checkerboard pattern with private land. Intermingled nonfederal lands are owned primarily by private timber companies and are managed for commercial timber production. Most of the access to the federal and nonfederal timberlands is controlled through long-term or perpetual reciprocal right-of-way agreements which do not include public access. Because of this, many BLM roads may not be legally available for public access. Private land owners (predominantly private timber companies) are reporting increasing resource damage from public use. Completion of a Comprehensive Travel and Transportation Management plan would assist in working through access issues externally and internally. In a future RMP revision or amendment, RMP objectives or direction that provide for seeking public access based on a hierarchy of need (i.e. lands that have high recreation potential) would help prioritize district resources to accomplish this goal. The 2008 RMP included management direction to obtain legal public access with a priority for BLM-administered lands with high recreation potential.

The BLM-issued regulations at Title 43 CFR Subpart 8342 requires that designation of public lands as open, limited, or closed to off-road vehicles be based on the protection of the resources of the public lands, the promotion of the safety of all the users of the public lands, and the minimization of conflicts among various uses of the public lands.

There are two recent rulings with regard to travel management plans, off-highway vehicle designations, and minimization criteria.

- *Oregon Natural Desert Association vs. BLM, U.S. Court of Appeals, Ninth Circuit, Case No. 05-35931.*

The 9th circuit ruled on July 14, 2008, that the range of alternatives was not sufficient to satisfy National Environmental Policy Act requirements. In this case, the judge ruled that having 1% or less of BLM lands with the "closed" designation for each alternative was not appropriate and did not reflect a reasonable range of off-highway vehicle designations based on resource concerns.

- *Center for Biological Diversity, et al. v. Bureau of Land Management, et al. U.S. District Court for the Northern District of California, No. C 08-05646 JSW, Decided April 14, 2009.*

The BLM used a decision tree to determine off-highway vehicle designations. The 9th circuit found that the decision tree was flawed because it did not consider the minimization criteria outlined in 43 CFR 8342.1. The court also found that the alternatives were flawed because every alternative contained a relatively similar 5,000 mile route network.

These two cases should be used to inform off-highway vehicle designations and alternative development in future RMP revisions. The 2008 RMP revision effort had minor differences between the action alternatives relative to off-highway vehicle designations. While the 2008 revision did not explicitly acknowledge the minimization criteria, it did describe that off-highway vehicle designations are based on protecting natural and cultural resources and public safety, and limiting visitor conflicts.

Recreation

New national policy direction (WO-IM-2011-004) established a 3-tiered classification system for recreation use land use allocations. The 1995 RMPs and the 2008 RMP revision used the superseded 2-tier classification system. A plan revision or amendment would be necessary to apply this new direction.

There is new national direction as part of the BLM H-1601-1 Land Use Planning Handbook (March 2005) to identify management objectives for interpretation and environmental education and establish significant resources or areas that will be made available for interpretation and environmental education. The 2008 RMP incorporated this new direction.

Many of the potential recreation sites and trails in the 1995 RMPs are no longer valid. Historic trails are not addressed in the 1995 RMPs. A plan amendment or revision would provide an opportunity to designate new or potential sites and trails or drop those that are no longer valid. The 2008 RMP revision included this update.

The Recreation Permits and Fees Manual 2930 was revised in 2007. It requires appropriate consideration of recreation permits and fees within the RMP revision or amendment process, including the establishment of special areas where permits may be required to accomplish resource management objectives. The RMP process must be used to identify and quantify the areas that have restrictions on users, such as numbers of permitted users, season of permitted use, location, group size, activity type, or modes of transportation. At a minimum, areas should be identified as sites designated specifically for certain activities. Neither the 1995 RMPs nor the 2008 RMP revision incorporated this new policy.

Areas of Critical Environmental Concern

As part of the 2008 western Oregon plan revision, newly nominated Areas of Critical Environmental Concern were evaluated to determine if they met the criteria for relevance and importance so they could be carried forward into the plan revision as potential Areas of Critical Environmental Concern. The 2008 Records of Decision/RMPs designated these potential Areas of Critical Environmental Concern except where they conflicted with timber management on O&C lands. Since the 2008 RMPs and Records of Decision were vacated and remanded by the court, BLM policy requires temporary management for potential Areas of Critical Environmental Concern until they can be further evaluated during a future plan amendment or revision. Temporary management includes reasonable measures necessary to protect human life and safety or significant resource values from degradation. Areas of Critical Environmental Concern designated by the 1995 RODs/RMPs remain in place as designated. Please see Appendices 3-8 for a list of Areas of Critical Environmental Concern for each district. Department of the Interior planning regulations (43 CFR 1610.7-2) require that areas having potential for ACEC designation be identified and considered throughout the resource management planning process. A plan revision would provide an opportunity to review the 2008 nominations as well as any new nominations.

Visual Resource Management

Field offices are required to maintain visual resource inventories and to have visual resource management classes designated within its RMPs. Both the inventory and management class determinations are critical for baseline National Environmental Policy Act visual impact analysis and compliance evaluation with visual resource management objectives. Both the 1995 RMPs and the 2008 RMP revision contain visual resource management classes. The visual resource inventories were completed over 20 years ago. The inventories should be reviewed and either validated or revised prior to initiation of an RMP revision process.

Wild and Scenic Rivers and Lands with Wilderness Characteristics

Some districts have not yet determined if eligible Wild and Scenic Rivers meet the criteria for suitability as Wild and Scenic Rivers. A plan amendment or revision

would be necessary to complete this determination. There are some actions the districts can take to prepare for eventual suitability determinations. Sections 4(a) and 5(c) of the Wild and Scenic Rivers Act provide the factors to be considered in determining suitability. The districts could begin gathering information to support the consideration of the relevant factors. This would include compiling data such as current land ownership and use in the area, local zoning, assessing the state/local government's ability to manage and protect outstandingly remarkable values on nonfederal lands, and the potential for water resources development. The 2008 RMP revision did not include suitability determinations.

The Federal Land Policy and Management Act (FLPMA) requires that the BLM maintain up-to-date inventories. Wilderness characteristics inventories conducted for the 2008 RMP revision identified nine areas that contain wilderness characteristics. A plan revision or amendment would provide an opportunity to make RMP level decisions about whether to manage these areas to protect their wilderness characteristics.

A future plan revision should update the inventory to determine if there have been any changed circumstances (e.g., land acquisitions, road closures) that might allow any new areas to qualify as lands with wilderness characteristics.

Fire and Fuels

There have been numerous new national policies since 2004 that define required RMP decisions and priorities for fire and fuels as described below:

- *A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment, 10-Year Strategy Implementation Plan (revised 2006).*

  This plan was completed by the Western Governors' Association, the Secretaries of the Departments of Agriculture and the Interior, and others. The updated plan emphasizes a landscape-based approach for restoration of fire adapted ecosystems and the importance of using fire as a resource management tool.

- *Guidance for Implementation of Federal Wildland Fire Management Policy (2009)*

  This guidance was issued by the interagency Fire Executive Council. It redefined key terms and eliminated the distinction between wildfires managed to achieve land use plan objectives and wildfires that are suppressed. It created inconsistencies between federal fire policy and current BLM land use planning requirements for the use of unplanned fires. The 2008 RMP revision did not include this new guidance.

- *Federal Land Assistance, Management, and Enhancement (FLAME) Act, PL 111-88 (2009).*

  This law requires the Secretary of the Interior and the Secretary of Agriculture to submit to Congress a report that contains a cohesive wildfire management strategy. The strategy will address the use of appropriate management responses to wildfire, assessing risks to communities, assessing the impacts of climate change on the frequency and severity of wildfire, and studying the effects of invasive species on wildfire risks. The national cohesive strategy was released in 2010. This strategy could affect land use planning requirements. It was not considered in the 2008 RMP revision. A western regional cohesive strategy will be released in the future.

- *EPA's Exceptional Event Rule, 40 CFR Parts 50 and 51, March 22, 2007.*

  In order to classify smoke intrusions from wildfires as exceptional events, the land use plan or fire management plan must have designated the affected lands as areas where fires are necessary and desirable to accomplish specific resource management objectives. Neither the 1995 RMPs nor the 2008 RMP revision made such designations. If wildfire smoke intrusions result in non-attainment areas, there are implications for communities since it can create severe restrictions on other sources of particulates, such as industrial or agricultural operations.

  The checkerboard pattern of the O&C lands limits opportunities for the use of unplanned fires to meet land use plan objectives. The greatest opportunity for designated use of unplanned fires occurs in the Galice Block in the Medford District. The Galice Block is a relatively large area of contiguous lands that also borders the Siskiyou National Forest. Additional opportunities may also exist in the southern part of Medford or may develop in the Cascade-Siskiyou National Monument through land exchanges.

The 2008 RMP FEIS (pages 808-812) showed that uneven-aged harvest treatments would be effective in reducing the number of acres at risk for high fire severity compared to the implementation of the management direction in the 1995 RMPs. These types of treatments would be most relevant for southern Oregon districts.

Climate Change

The EIS's for the 1995 RMPs contained a general analysis of the effect of regeneration harvest on carbon dioxide emissions. The 2008 RMP FEIS (pages 537-543) showed that the 1995 EIS analysis was out-of-date and incomplete and reached a contrary analytical conclusion. Because the 1995 EIS does not provide an adequate basis for tiering, project-level National Environmental Policy Act analysis has been providing the analysis. A plan revision would provide an opportunity to include EIS

level analysis on climate change to which project National Environmental Policy Act analysis can tier.

There has been a new law and two secretarial/presidential orders regarding climate change and carbon sequestration that could be used to inform development of RMP objectives or direction during a plan revision.

- *The Energy Independence and Security Act of 2007 (Public Law. 110-140).*

  Under this law, the Department of the Interior must complete national assessments of the potential of geological (underground) and biological (within soil and vegetation) carbon sequestration to mitigate greenhouse-gas emissions. This assessment will be used to develop strategies to enhance carbon storage. These best-management practices will have the goals of mitigating climate change, restoring and improving the health of ecosystems, facilitating adaptation to climate change, and providing green jobs.

- *Secretarial Order No. 3289, Addressing the Impacts of Climate Change on America's Water, Land, And Other Natural and Cultural Resources.*

  On September 14, 2009, Secretary Salazar launched a coordinated Department of Interior strategy to address current and future impacts of climate change on America's natural and cultural resources. Working at the landscape, regional, and national scales through the establishment of Department of the Interior Climate Science Centers and Landscape Conservation Cooperatives, the Department of the Interior is providing information and best management practices available to support strategic adaptation and mitigation efforts on both public and private lands.

- *Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance.*

  On Oct. 5, 2009, President Obama issued Executive Order 13514, which directed all the agencies of the federal government to lead by example in the reduction of greenhouse-gas emissions. The Department of the Interior is developing a baseline of existing greenhouse-gas emissions from its activities and will be setting targets for reducing greenhouse-gas emissions from Interior buildings, vehicles, and operations, and through innovative land-use management practices.

Water

Total Maximum Daily Loads

Total Maximum Daily Loads are required for all sub-basins containing water quality limited (303d listed) water bodies as required by the Clean Water Act. The Oregon Department of Environmental Quality (ODEQ) issues Total Maximum Daily Loads

and requires each Designated Management Agency to provide an implementation plan identifying how agencies will manage lands to meet water quality standards. For BLM this is known as a Water Quality Restoration Plan.

The BLM does not anticipate that Total Maximum Daily Loads will require the BLM to manage Federal lands differently from the objectives contained within the Aquatic Conservation Strategy and implementation of the Riparian Reserve Land Use Allocation. Although RMP implementation is unlikely to change due to a Water Quality Restoration Plan, there is a need to update specific management direction in future RMP revisions to recognize load targets associated with the Total Maximum Daily Load (e.g. shade targets and percent effective shade) and to acknowledge the role of intermittent stream channels in regulating annual water temperature. The 2008 RMP revision included management objectives for shade and other water quality parameters. Management direction was specifically designed to provide shade along streams.

Any revised RMP management direction should identify the types of restoration and consider the restoration priorities identified within Water Quality Restoration Plans. An RMP revision would also offer an opportunity to provide some required components of Water Quality Restoration Plans which may reduce the analysis burden for initial or updated Water Quality Restoration Plans.

Source Water Assessments

The state of Oregon completed Source water assessments for all public water systems in Oregon that have at least 15 hookups, or serve more than 25 people year-round. They are required under the Safe Drinking Water Act and many have been completed since 2004.

Source water assessments define the groundwater and surface water source areas which supply public drinking water, identify sources of contamination within these areas, and determine the most susceptible areas at risk for contamination within "sensitive areas." Typically sensitive areas include zones of highly permeable soils, high erosive soils, high runoff potential, and areas within 1000 feet of streams.

Often, BLM lands contain one or more of these criteria including a high density stream network. The Oregon Department of Environmental Quality encourages other agencies to use the sensitive areas as priorities for water quality protection within their programs. Consideration of the Source water assessments, contamination sources, and their relation to BLM objectives and actions needs to be completed through plan revision. The 2008 RMP revision analyzed impacts to source water areas but did not contain separate management objectives or direction for their protection.

Best Management Practices

Best management practices are required by the Clean Water Act. The BLM revised water quality best management practices to reduce sediment delivery from BLM roads in Oregon in September 2011.

In *NEDC v. Brown*, 07-35266 (9th Circuit), the United States Court of Appeals for the Ninth Circuit, held that logging road storm water runoff storm water runoff that is collected and channeled in a system of ditches and culverts before being discharged into streams and rivers constitutes a point source subject to the National Pollutant Discharge Elimination System permit requirements of the Clean Water Act. In reaching this holding, the court refused to defer to the Environmental Protection Agency's interpretation of the "silvicultural rule," under which the agency had, for approximately 30 years, excluded logging road runoff from the definition of "point source" pollution. The *NEDC* litigation centered around two roads in Tillamook County, but the ruling as it affects the interpretation of the silvicultural rule applies throughout the 9th Circuit Court's jurisdiction. Currently there are no permits available in Oregon to satisfy this ruling. On June 25, 2012, the U.S. Supreme Court granted certiorari in *NEDC* (Northwest Envtl. Def. Ctr., et al. v. Brown, et al., 640 F.3d 1063 (9th Cir. 2011), cert. granted sub nom. Decker et al. v. Northwest Envtl. Def. Ctr. et al., 2012 U.S. LEXIS 4793 (U.S. June 25, 2012) (No. 11-338)).

This ruling has elevated public awareness and internal control mechanisms to reduce and eliminate erosion, sediment delivery and runoff from logging roads. The Oregon/Washington BLM conducted a formal review and update of existing road best management practices (including those developed during the western Oregon plan revisions). The outcome of this review was a developed set of best management practices that are to be included in current RMP's through plan maintenance. Plan revision is not necessary as the RMPs contain objectives to meet the Clean Water Act and management direction to implement best management practices.

The 1995 RMPs do not require field-level effectiveness monitoring for best management practices. Plan maintenance should be completed to update the RMP monitoring plan to clarify that districts should be completing both implementation and effectiveness monitoring and consistently reporting results in the Annual Program Summary and Monitoring Report. The 2008 RMP revision did not include effectiveness monitoring for best management practice.

Additionally, the 5 year report on progress under the BLM/Oregon Department of Environmental Quality Memorandum of Understanding (2010) indicates there is difficulty in reporting on implementation and effectiveness for specific best management practice to water quality regulators (Oregon Department of Environmental Quality and the Environmental Protection Agency). Reporting the implementation and effectiveness of best management practices will be necessary for compliance with the Memorandum of Understanding and for any future National Pollutant Discharge Elimination System permitting. Annual Program Summaries should be enhanced to capture results of monitoring and consistent reporting of results.

Data, Inventory, and Regional Monitoring

Under the 1995 RMPs, the widths of Riparian Reserves vary with the presence of fish and stream periodicity (intermittent vs. perennial flow). District hydrography updates and field verifications of fish presence and stream periodicity have decreased the acres of Riparian Reserve from what was initially mapped, thus increasing the total acres contained in the forest management land use allocations. The 2008 RMP FEIS analysis of the No Action Alternative (continuation of the 1995 RMPs) estimated riparian reserves associated with stream channel network and fish presence occupy 15% of BLM-administered lands as opposed to the 22% estimated during the Northwest Forest Plan FEIS analysis. This new information has a bearing on the sustainable harvest level that was calculated for each district's RMP (see timber management section).

The 2008 RMP FEIS used periodicity data (e.g. perennial, intermittent, and ephemeral flow) to determine water quality effects for temperature and the extent of the Riparian Management Area allocation. Stream periodicity is also a significant data set for appropriate application of best management practices, Total Maximum Daily Loads and Riparian management direction for protection of water quality. New inventories may be needed to improve the data on stream "periodicity." This data would inform future RMP revisions as periodicity is a likely basis for riparian allocations.

Riparian Performance Measure

The BLM has a new performance measure: Percent of RMPs evaluated by the BLM as making significant progress toward achieving riparian condition goals. This performance measure gauges the BLM's effectiveness in meeting or making progress toward the goals, objectives, and/or management actions identified in BLM RMPs signed since initiation of the National Land Use Planning Initiative in 2001.

Completion of the standard worksheet used to document accomplishment of the performance measure is optional for RMP decisions prior to 2000. The narrative below provides an assessment of progress towards meeting the riparian objectives included in the districts' 1995 RMPs.

The Aquatic and Riparian Effectiveness Monitoring Program determines if the Northwest Forest Plan's aquatic conservation strategy is achieving the goals of maintaining and restoring the condition of watersheds. The Watershed Condition 15 Year Report (Lanigan et al, 2011) describes the status of aquatic and riparian resources and changes in their condition under the Aquatic Conservation Strategy. An evaluation of upslope and riparian (watershed-wide) conditions was completed for all 1,379 sixth-field watersheds in the Northwest Forest Plan area with significant federal ownership. The evaluation was based on U.S. Forest Service and Bureau of Land Management geographic information system data and satellite imagery for roads and vegetation.

Watershed-wide condition scores were calculated for 1994 and 2009, and the difference in these scores was used to represent trend. The overall riparian condition scores of the 1,379 watersheds mostly fell into the low (21 percent), moderate (27 percent) high (26 percent), and very high (22 percent) categories; relatively few watersheds scored in the very low (4 percent) category. The majority of watersheds (69 percent) had a positive change in condition scores (trend). Of those with larger positive changes, most were driven by both improvements in road (decommissioning) and vegetation (natural growth) scores.

Soil

Soil productivity

The 1994 Environmental Impact Statements for the 1995 RMPs contained an objective to maintain and/or improve soil productivity. There was no management direction that described how soil productivity would be determined. Districts have used a variety of methods including measurement of tree growth and observation of vegetation or biotic measures (bacteria or fungal populations) within the soil itself.

The 1995 RMPs do not provide specific management direction for achieving soil productivity. The RMP environmental impact statements do not provide detailed analysis of methods for achieving soil productivity but includes BMPs expected to prevent unacceptable soil degradation. Project-level National Environmental Policy Act analyses provide detailed analysis of specific BMPs in relation to soil productivity. A plan revision would provide an opportunity to include more detailed EIS level analysis on soil productivity to which project National Environmental Policy Act analysis can tier.

The 2008 RMP revision made an attempt to better define productivity but it also removed many of the best management practices that would be employed to preserve soil productivity through reducing compaction, erosion and site disturbance in the uplands. In March 2010, the BLM issued "A Synopsis and Updated Guide of the Standard Operational Practices for the Upland Soil Productivity in Western Oregon." The intent of these Standard Operational Practices (SOPs) is to provide a reference guide of general practices to be used by soil scientists to maintain or improve site productivity when implementing land management activities. At the project planning stage, these practices are consulted to create project design features that would prevent the soil resources from unnecessary impacts or lessen the impacts to an acceptable level when implementing the proposed action.

Ground Based Harvesting

There are many new types of equipment for ground-based harvesting and slash-reduction. The impacts of this equipment on long-term soil productivity, soil compaction, and hydrologic function were not analyzed in the 1995 RMP EIS. Project level National Environmental Policy Act analysis is used to evaluate the impacts each time the action is proposed. A plan revision would provide an

opportunity to include EIS level analysis on soil productivity from which project National Environmental Policy Act analysis can tier.

Compaction and Disturbance

Currently, best management practices allow for a maximum of 10 to 12% soil compaction rate (depending on the district) for a harvest unit. Restricting equipment to designated skid trails or existing skid trails (as required by current best management practices) is not possible with a single operator mechanized harvesting technique. The effect of the equipment moving across the unit in an orderly fashion but with a larger footprint than previously analyzed produces both a higher percentage of soil compaction and disturbance. It is unknown how these impacts affect our ability to manage forest and soil resources in the long term. A plan revision would provide an opportunity to re-examine soil compaction in light of the economic advantage that ground based harvesting would provide. The 2008 RMP and FEIS attempted to standardize both the level of compaction and the surface disturbance associated with harvesting.

Archeology, Paleontology, Cultural and Historic Uses Including Native American Values

BLM Manual 8130, Planning for Uses of Cultural Resources, was revised in 2004 and requires new and revised RMPs to identify the nature and importance of cultural resources; establish goals for their management; make cultural resource use allocation decisions in support of the objectives; and choose management actions and prescriptions that will contribute to achieving those decisions.

The 8130 Manual provides an explicit description of the objectives, land use allocations, and management direction for cultural resources that should be included in RMPs.

The 1995 RMPs do not conform to current BLM policy for cultural resources or the identification of places of traditional use and importance to tribes. The 8130 manual states that older RMPs will need to be updated to current standards as soon as practicable. The 2008 RMP revision incorporated this new guidance.

There is a need for strategic surveys to better predict where sites are likely to occur. In conjunction with strategic surveys, there is also a need to strategically evaluate documented archaeological sites to assess their scientific importance and eligibility to be listed in the National Register of Historic Places. These actions will allow for (1) a more accurate prediction of environmental consequences; (2) more effective compliance surveys and (3) a more focused approach for long term management of important archaeological sites. Strategic survey and evaluation would aid BLM in the identification of landforms that are most likely to contain significant cultural properties and would improve the BLM's ability to meet RMP objectives and avoid damage to cultural, archeological, and paleontological resources.

The west-side districts should address the backlog of data entry for cultural resource site and field survey records into the Oregon Heritage Information Management System. Data entry into the GIS system would improve data on the status of efforts to inventory public lands for important cultural sites and their current condition(s). Entry of these data into Oregon Heritage Information Management System and GIS analysis of the information will inform future RMP revisions by serving as the basis for strategically-based inventory, site monitoring, and cultural resource use allocations.

Only the Roseburg 1995 RMP contains an objective for managing paleontological sites. The 2008 RMP revision contained management objectives and direction for paleontological sites for all districts.

Renewable Energy

There have been four national programmatic National Environmental Policy Act compliance and planning efforts that are relevant to western Oregon RMPs (see list below). A plan amendment or revision would provide an opportunity to incorporate the results of these national efforts.

- *2010 Draft Programmatic EIS for Solar Energy Development in Six Southwestern States.*

  This PEIS covers the Southwestern states and does not include Oregon. However, certain aspects of the PEIS should be considered for solar development in portions of Oregon. An example would be to incorporate Table ES.2-2 (Areas for Exclusion under the BLM Solar Energy Development Program) for Medford and Klamath Falls. The 2008 RMP revision did not include exclusion areas for solar developments.

- *2006 Record of Decision for Implementation of a Wind Energy Development Program and Associated Land Use Plan Amendments for the Wind Energy Development Programmatic EIS.*

  The RMPs for Coos Bay, Eugene, Medford, and Salem districts were amended by this Record of Decision. The amendments include (1) adoption of the proposed programmatic policies and best management practices, and (2) identification of specific areas where wind energy development would not be allowed. The 2008 RMP revision was completed after the 2006 Wind Record of Decision but did not include the provisions of that Record of Decision.

- *2008 Record of Decision and Resource Management Plan Amendments for Geothermal Leasing in the Western United States.*

  The 1995 RMPs for Eugene, Medford, Roseburg, and Salem were amended by the Geothermal Leasing Record of Decision. The amendment included areas open or closed to geothermal leasing, reasonably foreseeable development scenarios, leasing stipulations and procedures, and best management practices. The 2008 RMP revision did not incorporate the provisions of the 2008 Geothermal Leasing Record of Decision.

- *2009 Approved Resource Management Plan Amendments/Record of Decision for Designation of Energy Corridors on Bureau of Land Management-Administered Lands in the 11 Western States.*

  The 2009 Record of Decision stipulates that corridor-related amendments are incorporated into existing land use plans upon signature of the Record of Decision. The 2008 RMPs were the land use plans in effect at the time and were amended by the 2009 Record of Decision. Since the 2008 Western Oregon Plan Revision Records of Decision were subsequently vacated and remanded by the court, the 2009 energy corridor plan amendments would not apply to the 1995 RMPS. Although the plan amendments do not apply to the 1995 RMPS, districts can incorporate by reference from the Programmatic EIS used to support the 2009 Record of Decision.

A National Energy Policy Act was enacted by Congress in 2005. The Act changed national energy policy by providing tax incentives and loan guarantees for energy production of various types including renewable energy. The Act prompted multiple Department of the Interior policy objectives for renewable energy. A plan amendment or revision would provide an opportunity to incorporate these new policies into the RMPs. None of the guidance mentioned below was incorporated into the 2008 RMP revision. New policies include the following:

- *Wind Energy Protocol between the Department of Defense and Bureau of Land Management, July, 2008.*

  This protocol sets consultation on development of wind energy projects and turbine siting on public lands administered by the BLM to ensure compatibility with military activities.

- *WO Information Memorandum 2009-022, Geothermal Leasing under the Energy Policy Act of 2005.*

  This information memorandum provides the process for competitive lease sales under the revised geothermal regulations, including the nomination process.

- *WO Information Memorandum 2009-043, Wind Energy Development Policy.*

  This information memorandum clarifies the BLM Wind Energy Development policies and best management practices provided in the Wind Energy Development Programmatic Environmental Impact Statement of June 2005.

- *WO Information Memorandum 2009-167, Application of the Visual Resource Management Program to Renewable Energy.*

  In the future, Renewable Energy Zones on public lands may be designated if local area conditions are found to be suitable to host renewable energy development. If visual resource inventories are not current and visual resource management class designations have not been designated in the land use plan, then inventories and designations must be completed.

- *Secretarial Order No. 3285, Amendment 1, Renewable Energy Development by the Department of Interior.*

  This 2009 Order (Amended in 2010) made production and transmission of renewable energy on public lands a priority for the Department of Interior.

- *WO Information Memorandum 2010-156, Bald and Golden Eagle Protection Act-Golden Eagle National Environmental Policy Act and Avian Protection Plan Guidance for Renewable Energy.*

  See the wildlife section for a detailed discussion of this information memorandum.

- *WO Information Memorandum 2011-003, Solar Energy Development Policy.*

  This information memorandum provides updated guidance on the processing of right-of-way applications and the administration of right-of-way authorizations for solar energy projects.

- *WO Information Memorandum 2011-059, National Environmental Policy Act Compliance for Utility-Scale Renewable Energy Right-of-Way Authorizations.*

  The purpose of this information memorandum is to reiterate and clarify existing BLM National Environmental Policy Act policy to assist offices that are analyzing externally-generated, utility-scale renewable energy right-of-way applications.

- *WO Information Memorandum 2011-060, Solar and Wind Energy Applications-Due Diligence.*

  This information memorandum provides updated guidance on the due diligence requirements of right-of-way applicants for solar and wind energy development projects on public lands administered by the BLM.

- *WO Information Memorandum 2011-061, Solar and Wind Energy Applications-Pre-Application and Screening.*

  This information memorandum provides updated guidance to the review of right-of-way applications for solar and wind energy development projects.

Minerals and Energy

Reasonably foreseeable development scenarios and associated stipulations were created for mineral fluid potentials and developments in the 2008 RMP revision. The reasonably foreseeable development scenarios represent the most current science and evaluation of mineral fluid potentials in Western Oregon. Reasonably foreseeable development scenarios also analyzed impacts from potential development. A plan amendment or revision would provide an opportunity to incorporate this new information into the 1995 RMPs.

A plan amendment or revision would provide an opportunity to incorporate new national policy related to energy development into RMP objectives and management direction. Neither the 1995 RMPs nor the 2008 RMP revision include the new policies described below:

- *WO Information Memorandum 2008-032, Exceptions, Waivers, and Modifications of Fluid Minerals Stipulations and Conditions of Approval, and Associated Rights-of-way Terms and Conditions.*

  This information memorandum provides guidance for incorporating exception, waiver, and modification criteria into a land use plan; making changes to fluid minerals leasing decisions/stipulations in a land use plan; and reviewing and approving lease stipulation exceptions, waivers, and modifications for oil, gas, and geothermal leases that have been issued.

- *WO Information Bulletin 2008-107, Bureau of Land Management (BLM) Energy and Mineral Policy.*

  This information bulletin sets forth BLM policy for management of energy and mineral resources on public lands as a component of the agency's multiple use mandate.

- *WO Information Memorandum 2010-117, Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews.*

  This information memorandum addresses land use plan review, state office standardization of lease stipulations, adaptive management, Master Leasing Plans, and identifies process requirements for reviewing oil and gas leasing expressions of interest.

- *WO Information Memorandum 2010-169, Implementation Guidance for the Interagency Transmission Memorandum of Understanding.*

  The memorandum of understanding is intended to improve coordination for the review and authorization of major electricity transmission lines that cross federally managed lands in the United States.

On April 17, 2006, Pacific Connector Gas Pipeline, LP filed a preliminary application for right-of-way with the BLM. BLM has authority under the Mineral Leasing Act to grant rights-of-way on behalf of itself and other federal agencies for gas pipelines. In this instance, the BLM, Forest Service and Bureau of Reclamation manage lands and facilities crossed by the proposed pipeline.

The BLM has evaluated the consistency and conformance of the proposed Pacific Connector Gas Pipeline with the 1995 Resource Management Plans for the Coos Bay, Roseburg and Medford Districts, and the Klamath Falls Resource Area of the Lakeview District and determined there is a need to amend Resource Management Plans to accommodate the right-of-way grant. Four areas were identified for supplemental analysis under the National Environmental Policy Act. These are: right-of-way clearing in occupied marbled murrelet stands; right-of-way clearing in Late-Successional Reserves and Diversity/Connectivity Blocks; Standards and Guidelines for Survey and Manage; and Aquatic Conservation Strategy consistency.

On September 4, 2007, Pacific Connector Gas Pipeline, LP filed an application with the Federal Energy Regulatory Commission (FERC) to construct a natural gas transport pipeline from the proposed Jordan Cove liquefied natural gas import facility to be located in Coos Bay, Oregon to a distribution pipeline near Malin, Oregon. The FERC prepared Draft and Final EISs for the project and on December 17, 2009 issued an order granting Pacific Connector Gas Pipeline a Certificate of Public Convenience and necessity under section 7(c) of the National Gas Act. Subsequently, Jordan Cove Energy announced its intention to convert the proposed facility to an export facility. On April 16, 2012 FERC rescinded the previously issued certificates and instructed Jordan Cove Energy and Pacific Connector Gas Pipeline to submit new applications and announced that they would begin a new EIS process in response to the applications.

The BLM was a cooperating agency with FERC on the previous EIS process for the proposed import facility and intends to become a cooperating agency in the future

EIS process for the export facility. As a cooperating agency, the BLM intends to consider plan amendments and granting of the rights-of-way for the natural gas pipeline under the FERC-led EIS process.

2. District Specific

Salem District

Summary of 2004 Plan Evaluation

Overall, the evaluation team found that programs were meeting or partially meeting the established RMP objectives. The RMP decisions were proving correct over time, although implementation progress, especially for timber management was constrained.

There were new legal or policy mandates as a result of new statutes, proclamations, executive orders or court orders that were not addressed in the RMP. There were new Endangered Species Act listed species and the State of Oregon had developed a court ordered schedule for completing Water Quality Management Plans. Existing RMP components provided a means to address these changes. Further consideration of these changes could be addressed through a RMP revision or amendment.

There was new data on cumulative impacts from watershed analyses and research on the number of snags needed to sustain populations of cavity nesting bird populations. Pending analyses, such as the U.S. Fish and Wildlife Service Conservation Needs Assessment for the northern spotted owl and marbled murrelet provided new information that could affect RMP assumptions.

Several programs, including timber management, showed their ability to function in the short-term (approximately 5 years) in general conformance with the RMP. Short-term program needs in the Sandy River/Mount Hood Corridors, proposed changes to Off Highway Vehicle designations and revisions to various minor portions of the realty program could be met through a separate RMP amendment or revision. ESA conservation strategies, recovery plans, or management guidance for species could create the need for plan maintenance or amendments.

Overall, the Salem RMP was determined to be sufficient to guide management direction in the short-term (approximately five years). However, to make long-term improvements to the RMP, such as program efficiency and established program levels sustainable over the long-term, programmatic adjustments and refinements to RMP direction and standards could be developed through RMP revision.

2010 Plan Evaluation

District personnel used annual program summaries and monitoring reports from 2004 – 2010 to complete a review of all programs that had previously been reviewed in the 2004 plan evaluation. Appendix 3 contains detailed supporting documentation for the

Salem District's plan evaluation. There have been no changes to the 2004 plan evaluation conclusions regarding program implementation, achievement of RMP objectives, and correctness of RMP decisions.

There is some new information on the recreation program and Wild and Scenic Rivers that would be relevant to a future RMP revision. The district completed several activity-level management plans including one for the Sandy River Basin. The district has also determined that there are additional rivers that meet the criteria for eligibility as Wild and Scenic rivers.

The Salem District identified several plan amendments or plan maintenance opportunities as described below.

Late Successional Reserves - There are several Late-Successional Reserve boundaries (as described in the Crabtree, Quartzville, and Thomas Creek Watershed Analyses) that need to be adjusted through plan amendment.

Off-Highway Vehicle Designations - Off-Highway Vehicle area designations need to be revised through plan amendment or revision to reflect new national BLM policy and to address increased off-highway vehicle use.

Riparian Reserves - The application of Riparian Reserve designations on streams adjacent to BLM land but located on private property is not clear in the 1995 RMP and should be clarified through plan maintenance.

Eugene District

Summary of 2004 Plan Evaluation

Overall, the evaluation team found the approved RMP actions were being implemented, with an estimated 60 – 100% completed for specific assumed projects or actions needed to make progress towards meeting plan objectives.

The RMP decisions had proven correct over time although implementation progress, especially for the timber management program had been constrained. Species listed as threatened or endangered under the Endangered Species Act since the completion of the RMP/Record of Decision were afforded protection under plan guidelines. There was no available new data or analyses that affected the existing plan's validity and any such data could be incorporated through plan maintenance and used in ongoing implementation action decision making. There were no new legal or policy mandates as a result of new statutes, proclamations executive orders or court orders not addressed in the plan which could not be addressed through plan maintenance or considered and documented in ongoing implementation actions.

Some unmet program level needs or opportunities were identified through the RMP evaluation. These include completing District-level off highway vehicle designations in the recreation program and Area of Critical Environmental Concern program level

management needs. These were minor in scope and did not warrant an immediate amendment or revision. However, numerous procedural constraints and restrictions were limiting the ability of the Eugene District to fully implement the timber management program. While the timber management program could continue to function over the short term in conformance with the RMP, there would be opportunities to better balance competing mandates of existing laws through an RMP revision or amendment process.

Overall, the Eugene District RMP was determined to be sufficient to guide management direction for the next 5 years.

2010 Plan Evaluation

Eugene District staff evaluated the implementation of the 1995 Eugene District RMP from Fiscal Year 2004-2010 using the information in Annual Program Summaries and program-specific records, including National Environmental Policy Act analyses for implementation actions. Appendix 4 contains detailed supporting documentation for the Eugene District's plan evaluation. Based on that information and interdisciplinary discussions, the Eugene District has concluded that there have been no changes to the 2004 RMP evaluation conclusions regarding program implementation, achievement of RMP objectives, and correctness of RMP decisions.

An amendment to the 1995 Eugene District RMP may be needed in the future to change the land tenure of a tract of public domain land in Section 30, T.16S, R.3W, W.M. (Green Island) to identify it as suitable for disposal. The McKenzie River Trust, which includes several federal agencies and non-profit entities, may be interested in acquiring the tract in the future.

The 1995 Eugene District RMP states that, with the exception of some selected sections, the RMP does not apply to the West Eugene Wetlands. The Eugene District is initiating a RMP which will provide goals, objectives, and direction for the management of the approximately 1,340 acres of BLM-administered lands in the West Eugene Wetlands. This West Eugene Wetlands RMP will be separate from the Eugene District RMP.

Coos Bay District

Summary of 2004 Plan Evaluation

The special forest products, air quality, fire/fuels, rural interface, botany, special status plants, noxious weeds, recreation, visual resources, off highway vehicle, archeology/cultural/historical/paleontology, soils, and hydrography programs were being implemented effectively and were achieving desired outcomes and decisions continued to be correct over time. There had been no significant changes in the related plans or new data or analyses that significantly affected the planning decisions or the validity of the National Environmental Policy Act analyses and new inventories were not warranted. There were no needs for RMP amendments for these programs.

The timber management, silvicultural, wildlife, fisheries, lands and realty, access, withdrawals, roads, utility corridors, communication sites, renewable energy, adverse energy impacts, wilderness, wild & Scenic rivers, Areas of Critical Environmental Concern, and significant caves elements of the RMP were being implemented effectively and were achieving desired outcomes and decisions continued to be correct over time. There was some need for RMP amendments or maintenance for these programs as described below.

Timber/Silviculture – There were unanticipated constraints of litigation, Endangered Species Act compliance (marbled murrelet), northern spotted owls, and the Survey & Manage mitigation measure. In order to address cumulative effects for long-term program continuity, a plan amendment or revision should be considered.

Wildlife & Fisheries – The application of various constraints such as the Survey & Manage mitigation, northern spotted owl critical habitat, and marbled murrelet occupancy on the timber program exceeded that anticipated in the RMP.

Lands & Realty – A minor amendment could support further refinement, clarification, or expansion of land tenure opportunities, withdrawal and classification actions, and Recreation and Public Purpose Lease or sale options.

Energy – Future Coalbed Natural Gas lease applications could require an amendment.

Wilderness, Wild & Scenic Rivers, Areas of Critical Environmental Concern, and Significant Caves - Some plan maintenance was indicated for the near-term.

In order to address the long term needs of the timber management program, a plan amendment or revision should be considered. However, the Coos Bay RMP was determined to be sufficient to guide management direction for the next 5 years.

2010 Plan Evaluation

The Coos Bay District staff evaluated the implementation of the 1995 Coos Bay District RMP from Fiscal Year 2004-2010 using the information in Annual Program Summaries and program-specific records, including National Environmental Policy Act analyses for implementation actions. Appendix 5 contains detailed supporting documentation for the Coos Bay District's plan evaluation.

With the exception of the Aquatic Conservation Strategy, Rights of Way, Roads, and invasive species (Sudden Oak Death) as described below, there are no other changes to the 2004 RMP evaluation conclusions regarding program implementation, achievement of RMP objectives, and correctness of RMP decisions.

Aquatic Conservation Strategy – Compliance with the Aquatic Conservation Strategy is difficult at the site-scale for some Aquatic Conservation Strategy

objectives and impossible to meet on others. For examples, management of Dean Creek Elk Viewing Area and maintenance of existing constructed fire ponds is incompatible with the management direction for Riparian Reserves and the Aquatic Conservation Strategy. The ACS objective "*to maintain spatial and temporal connectivity within or between watersheds* cannot be achieved due to BLM's land ownership patterns.

Rights of Way – The approvals of large linear (power lines, pipelines) rights-of-way applications are incompatible with the management direction in the RMP. The Linear Rights of Way cannot avoid reserves or other protected areas on the landscape. Removal of occupied marbled murrelet habitat, which is exceedingly difficult to avoid, requires a plan Amendment. In addition, current language for Late Successional Reserves, Survey & Manage, and Aquatic Conservation Strategy objectives is not compatible for such projects.

Roads – Management Direction is adequate to meet resource needs; however, the lack of funding for road maintenance negatively affects the ability to manage roads to meet the objectives identified under other resource programs. These include meeting water quality best management practices, threats to resources, and the inspection/maintenance of infrastructure.

Invasive Species (Sudden Oak Death) – The 1995 RMP evaluation recommended that a forest pathogen and eradication module be incorporated into upcoming RMP revisions. The invasive pathogen that is causing Sudden Oak Death continues to infect forested stands in the south portion of the district and is spreading northward. The 2008 Record of Decision /RMP only partially allowed for treatments. Sudden Oak Death needs to be more fully addressed in a future plan revision.

The Coos Bay District evaluation team found new information that would inform the development of management objectives or direction or analysis of effects in a new plan revision.

Lands & Realty – The district is experiencing difficulty incorporating changes to national policy direction on land tenure adjustments due to management direction in the 1995 RMP. The RMP does not support some recently mandated land tenure activities. Land exchanges and land disposals are increasingly difficult or impossible to implement.

Because facilities (e.g. communication sites) were not administratively withdrawn from the Northwest Forest Plan management direction, the ability to conduct necessary vegetation clearing around these sites conflicts with the direction for Survey & Manage and removal of occupied marbled murrelet habitat.

Visual Resource Management – The Visual Resource Management inventory in the Coos Bay District was completed in the 1980's. Visual resource management classes in some visually sensitive areas (e.g. North Spit, Bastendorff and Dean Creek are currently Visual Resource Management Class IV) may need to be re-evaluated in the next RMP revision to determine if the current level of Visual Resource Management protection is warranted. Other areas within the timber management base may not warrant the current Visual Resource Management Class III designation under the 1995 RMP.

Wild and Scenic Rivers – Four river segments in the Coos Bay District (Sixes, South Fork Coos, South Fork Coquille, Umpqua) were found eligible for designation as part of the Wild and Scenic River System in the 1995 RMP. These four segments may need to be reassessed given the small amount of BLM lands within the corridors.

The Coos Bay District identified opportunities for plan amendments as described below.

Rural Interface Areas – Management Direction for Rural Interface Areas does not comply with the current direction for management of Wildland Urban Interface areas. A plan amendment to address this is needed. A Coos County Community Wildfire Protection Plan is being developed to address the needs for local Wildland Urban Interface areas. The RMP analyzed Rural Interface Areas at 2,100 acres and the Wildland Urban Interface acreage is 191,000 acres. Wildland interface treatments such as fuels reduction can conflict with management direction for Late Successional Reserves and Riparian Reserves.

Minerals and Energy - Management direction is adequate to meet current needs, but inadequate to address future needs. The 1995 RMP did not foresee the development of Coalbed Natural Gas in the Coos Bay basin. The Reasonably Foreseeable Development scenario forecasted only four drill pads and limited development (86 acres of disturbance, including roads and pipeline construction). In addition, the RMP special stipulations for leasables are largely "No Surface Occupancy" and are not supported by documentation in the 1995 RMP or 1994 FEIS. With the discovery of Coalbed Natural Gas in the Coos Basin, a more realistic Reasonably Foreseeable Development would be well development of 37-77 wells and a related disturbance encompassing between 291.5 and 525.75 cares. Issuing of leases for Coalbed Natural Gas would require an RMP Amendment. The 2008 RMP included an updated Reasonably Foreseeable Development scenario.

Roseburg District

Summary of 2004 Plan Evaluation

Overall, the evaluation found that the Roseburg District's implementation of RMP actions was at 0 – 150 percent implementation rate (depending on the action) for

specific assumed projects or actions needed to make progress towards meeting plan objectives.

The RMP decisions had proven correct over time since RMP approval although implementation progress, especially for timber management, had been substantially constrained. There were no major changes in the officially approved or adopted national resource related plans, programs, and policies of Indian Tribes, State or local governments, or other Federal agencies which have or would immediately affect the RMP.

There were no available new data or analyses that affected the existing plan's validity or such data could be incorporated through plan maintenance and used in decision-making. The district identified no critical or immediately warranted new inventories. There were no identified new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan which could not be addressed through plan maintenance (e.g., newly listed streams with water quality issues) or considered and documented in ongoing implementation actions (e.g., adverse energy impacts).

The district identified no unmet short-term needs or new opportunities that could only be met through a RMP amendment or revision. Overall, the Roseburg RMP was sufficient to guide management direction for the next five years.

2010 Plan Evaluation

The Roseburg District staff evaluated the implementation of the 1995 Roseburg District RMP from Fiscal Year 2004-2010 using the information in Annual Program Summaries and program-specific records, including National Environmental Policy Act analyses for implementation actions. Appendix 6 contains detailed supporting documentation for the Roseburg District's plan evaluation.

There have been some changes to the 2004 RMP evaluation conclusions regarding program implementation, achievement of RMP objectives, and correctness of RMP decisions as described below:

Marbled Murrelet – The 2004 plan evaluations concluded that marbled murrelet non-Late Successional Old Growth, "gray" habitat needs to be clarified and the requirements to survey prior to treating suitable marbled murrelet habitat should be revisited. Marbled murrelet non- Late Successional Old Growth "gray" habitat was defined through plan maintenance in 2004.

Lands and Realty (Utility Corridors) – See the discussion of the Pacific Connector Gas Pipeline under Minerals & Energy in the Common to All section of this 2011 plan evaluation report.

Botany (reseeding) – The 2004 plan evaluation concluded that there was a need for additional management action/direction for the use of reseeding as a

preventive measure in the integrated pest management control program. The district now believes that additional management direction is not needed.

Roads/Access/Right-of-Way - Survey and Manage standards and guidelines are affecting the district's ability to respond to access requests from both private and public parties that do not have rights under Reciprocal Right-of-Way Agreements and Permits.

The Roseburg District identified several plan amendments or plan maintenance opportunities as described below.

Minerals and Energy - Historically, rock quarries on the district were developed in conjunction with timber sales to provide road surfacing material. Reduced harvest revenues are not adequate to pay for development and processing of surfacing rock from district rock sources. There are very few pits remaining where district staff can obtain rock without further pit development. The objectives of the RMP for mineral materials are not being met. Conflicts with the requirements for other resources continue to create a level of unmet need for saleable minerals. The extent of this unmet need is still unknown.

The Roseburg district believes a plan amendment to designate functioning rock pits or, at a minimum, all community pits as administratively withdrawn lands is warranted. This administrative withdrawal would alleviate conflicts with the Record of Decision/RMP guidance for other resources (e.g. Late Successional Reserve guidance, Survey and Manage standards and guidelines).

Abandoned Mine Lands – A plan amendment to establish management direction is needed to address abandoned mine lands (AML). This would facilitate clean up and any potential actions that would be undertaken through the Comprehensive Environmental Response, Compensation and Liability Act of 1980.

Special Habitats - Special habitats may include: ponds, bogs, springs, sups, marshes, swamps, dunes, meadows, balds, cliffs, salt licks, and mineral springs (1995 Record of Decision/RMP, pg. 113). Most of these habitat features can also be protected through application of Riparian Reserve guidance for ponds/wetlands or the Timber Production Capability Classification. It is atypical for such features to need protection using the special habitat provision in the 1995 Record of Decision/RMP. District staff recommend plan maintenance to: (a) clarify which features should be considered as special habitat, and (b) refine Record of Decision/RMP direction for protecting special habitat to be more results-driven (e.g. preserve or enhance the feature) rather than prescriptive (e.g. 100-200 ft. buffer).

Marbled Murrelet –There are corrections needed regarding the marbled murrelet bulge (area where the Northwest Forest Plan Zone 1 bulges inland near Roseburg) that could be addressed through plan maintenance. The district uses the habitat

definition in the marbled murrelet listing package that defines the range of the marbled murrelet as 50-miles inland. This excludes the bulge but the map in the Northwest Forest Plan showing the bulge has not been corrected. The 2008 RMP excluded the marbled murrelet "bulge."

Umpqua Corridor Habitat Management Plan – The Umpqua Corridor Habitat Management Plan is dated and should either be revised or direction in the 1995 Record of Decision/RMP referring to it should be removed through plan maintenance. This plan was written in 1985 and generally provided protection for bald eagles, northern spotted owls, and osprey prior to the Northwest Forest Plan. The 1995 Record of Decision/RMP directs that "implementation of the Umpqua Corridor Habitat Management Plan will continue." Generally, the protections offered by the Umpqua Corridor Habitat Management Plan is now redundant with those in the 1995 Record of Decision/RMP and current 6840 special status species policies.

Rural Interface Areas – The "quality of life" objective is presented in the Rural Interface Areas guidance from the 1995 Record of Decision/RMP as follows:

> *Consider the interests of adjacent and nearby rural land owners, including residents, during analysis, planning, and monitoring related to managed rural interface areas. These interests include personal health and safety, improvements to property and quality of life.* (1995 RMP, pg. 54)
>
> *Use design features and mitigation measures to avoid/minimize impacts to health, life and property, and quality of life.* (1995 RMP, pg. 55)

"Quality of life" is broad, ambiguous terminology that is subjective and lends itself to disagreement and multiple interpretations. It is recommended that the wording be clarified (e.g. for human safety and protection of property) though plan maintenance as part of the update to the Community Wildfire Protection Plan.

Wild and Scenic Rivers - There were three rivers identified in the 1995 Record of Decision/RMP as eligible but they did not meet minimum suitability requirements. There were also two rivers that were eligible and determined to be unsuitable. Guidance in the 1995 Record of Decision/RMP specifies that actions within a 1/2 mile corridor must have either a positive or neutral effect on identified Outstandingly Remarkable Values on "eligible/suitable" rivers. There is some confusion as to whether this guidance applies to these five rivers. District staff recommends plan maintenance be used to clarify that the guidance for "eligible/suitable" rivers applies to those rivers that are both eligible and suitable or that are eligible and not yet evaluated for suitability.

Noxious Weed Control - The limits on the amount of herbicide active ingredient that may be used annually that are set in the 2010 Vegetation Treatments Using Herbicides on BLM Lands in Oregon EIS differ from the limits set in the 1985 Northwest Area Noxious Weed Control Program EIS referenced in the Record of Decision/RMP. District staff recommends that plan maintenance be used to reflect this new information.

Medford District

Summary of 2004 Plan Evaluation

The wildlife, fisheries, air quality, special areas, wilderness, noxious weeds, soils, hydrology, recreation, botanical, cultural, range management, hazardous materials, mining and energy, and special forest products programs were found to be effective in achieving the desired RMP outcomes and decisions continued to be correct or proper and management practices were found to be sufficient. There had been no significant changes in the related plans or new data or analyses that significantly affected the planning decisions or the validity of the National Environmental Policy Act analysis and new inventories were not warranted.

Implementation progress for timber management had been substantially constrained. The timber management program had not been effective in achieving the desired Allowable Sale Quantity because of court decisions, judicial procedures, the Survey and Manage Mitigation Measure, and constraints required in biological opinions for projects affecting species listed under the Endangered Species Act.

The new national and local interest in forest health and large scale forest fires and fuels treatments in the Wildland Urban Interface were not anticipated in the 1995 RMP.

There were no new legal or policy mandates as a result of new statutes, proclamations executive orders or court orders not addressed in the plan which could not be addressed through plan maintenance or considered and documented in ongoing implementation actions. Overall, the Medford RMP was sufficient to guide management direction pending the completion of the RMP revision. With the exception of the ongoing Cascade Siskiyou National Monument (EIS level analysis that superseded portions of the Medford RMP) and minor local and discretionary actions related to Off Highway Vehicle management in the John's Peak area and potential proposals from other agencies or project applicants, there was no immediate need to amend or revise the RMP.

2010 Plan Evaluation

Medford District staff evaluated the implementation of the 1995 Medford District RMP from Fiscal Year 2004-2010 using the information in Annual Program Summaries and program-specific records, including National Environmental Policy Act analyses for implementation actions. Appendix 7 contains detailed supporting documentation for the Medford District's plan evaluation.

There have been some changes to the 2004 RMP evaluation conclusions regarding program implementation, achievement of RMP objectives, and correctness of RMP decisions as described below:

Recreation - A significant increase in off-highway vehicle use and mountain bike use has occurred and existing opportunities have not kept up with demand. An increasing level of unauthorized off-highway vehicle use and resulting impacts on soil and water quality were not foreseen or analyzed by the 1994 FEIS.

Three areas were identified in the 2004 plan evaluations to be managed to provide for off-highway vehicle use. Two of the three have active planning efforts. A Draft EIS for the Timber Mountain Off-Highway vehicle Area was released in 2009. The Quartz Creek Off-Highway Vehicle Area is currently in the National Environmental Policy Act compliance phase. Inventory data for the third off-highway vehicle area in the Record of Decision/RMP (Ferris Gulch) shows there are not enough sustainable routes and mileage on BLM-administered land to provide a quality off-highway vehicle experience.

A comprehensive off-highway vehicle route inventory project that began in 2006 identified other high-use concentrated off-highway vehicle areas that could be managed for such uses. These seven areas were included and analyzed under the 2008 RMP revision.

There are unmet needs not addressed in the 1995 Record of Decision/RMP for Special Recreation Management Areas for mountain bike and/or equestrian use.

There is also a need to establish RMP management direction for the use of firearms in and around the Wildland-Urban Interface, recreational sites, and wild and scenic river corridors.

Minerals and Energy - Clarification needs to be made between the surface management regulations at 43 CFR 3809 (Notice-and Plan-Level Operations) and the 1995 RMP. The management direction and accompanying tables in the 1995 RMP need to be assessed for errors. The Master Title Plat is the source for identifying all mineral withdrawals and should be referenced in the RMP. Desired outcomes are not being met for withdrawals. Most withdrawals identified in the 1995 not been completed due to the BLM's mineral policy to keep lands open to mineral exploration. The current 43 CFR 3809 can provide sufficient protection to some of the areas that were designated for withdrawal but each site needs to be considered on a case by case basis. There is an increased amount of locatable mineral activity at all levels – casual use, notice of operation, and plan of operation on BLM-administered lands.

The 2008 Cascade-Siskiyou National Monument RMP superseded the Medford District RMP. Within the Monument, the Soda Mountain Wilderness Area was

designated by the Omnibus Public Lands Management Act of 2009. These updates in land use allocation need to be reflected in any future RMP revision.

The Medford District evaluation team found new information that would inform the development of management objectives or direction or analysis of effects in a new plan revision. These include the following items:

Grazing - The 1995 RMP tiers to the 1985 Medford Grazing Management FEIS. A reassessment of riparian and water quality impacts from livestock grazing should be completed in any RMP revision.

Off-Highway Vehicles – Increasing levels of off-highway vehicle use and resulting effects on soil and water quality need additional analysis not addressed in the 1995 RMP.

Northern Spotted Owl – Baseline habitat evaluation for owls is inadequate on the Medford District. Multiple vegetation data layers are used for forest inventory and habitat assessment; however, none of them are accurate enough to correctly delineate northern spotted owl habitat.

Most owl sites in the District have not had protocol surveys since the early 90s.

Abandoned Mine Lands – These lands were minimally addressed in the Medford District 1995 RMP under Rural Interface Areas. Area of consideration should be expanded outside this area. Consistency with other plans (e.g., Jacksonville Woodlands) and BLM policy may make remediation difficult.

Wild & Scenic Rivers - There was one designated Wild & Scenic River segments and four suitable Wild & Scenic River segments included in the 1995 RMP. A total of 64 river segments were studied for eligibility during the planning process for the 2008 Record of Decision/RMP. Of those, 16 river segments were found to be eligible and received interim protective management measures. These 16 river segments were not studied for suitability. In 2008, two proposed bills (Oregon Treasures Act of 2008 - HR. 6291, and Lower Rogue Wild and Scenic Rivers Act of 2008 - S. 3149) addressed six river segments on the Medford District that were not studied for eligibility or suitability during any RMP planning process.

Tribal - Local, federally recognized Tribes are actively involved with the Medford District on certain projects, such as the Table Rock Management Plan. As part of this plan, a recommendation will be made to add the 40 adjacent acres acquired from The Nature Conservancy into the Area of Critical Environmental Concern.

The Medford District identified several plan amendments or plan maintenance opportunities as described below.

Land Tenure - An assessment should be made on potential for assignment of lands with encroachments to Land Tenure Zone 3 through plan amendment, providing an additional management option for these lands.

Visual Resource Management – The description of the Visual Resource Management Class II lands in the 1995 RMP would not place the area adjacent to the recreational section of the Rogue Wild and Scenic River in Visual Resource Management Class II. However, the map, which accompanied the 1995 Record of Decision/RMP, did not distinguish between the recreational section and the wild section of the Rogue River. The Medford District has managed the lands designated on the map as Visual Resource Management Class II areas. This inconsistency should be clarified through plan maintenance.

The mandatory use of Visual Resource Management Class I in wilderness study areas was clarified in BLM's H-8410-1 Visual Resource Inventory Handbook by WO-Information Memorandum-2000-096 that requires Wilderness Study Areas be managed under Visual Resource Management Class I Objectives. Plan amendment is needed to reflect this change in Visual Resource Management class.

Klamath Falls Resource Area of the Lakeview District

Summary of 2004 Plan Evaluation

The evaluation found that 90% - 100% of planned RMP actions were being implemented to fully meet plan objectives. Monitoring and planning updates documented good progress towards achieving desired outcomes.

The RMP decisions were found to be correct. A Plan amendment was initiated to amend portions of the RMP to address Wild and Scenic Rivers and Areas of Critical Environmental Concern values for the Upper Klamath River. The amendment was never completed because of interruption by the Federal Energy Regulatory Commission's relicensing process for PacifiCorp's hydroelectric facilities. In general, there were few major changes in the officially approved or adopted natural resource related plans, programs and policies of Indian tribes, State or local governments or other federal agencies which would immediately affect the RMP.

RMP maintenance or amendments to incorporate upcoming new conservation strategies, recovery plans, or management guidance for species might be needed. The Klamath Falls Field Office identified no unmet needs or new opportunities that could only be met through an RMP amendment or revision. With a few potential exceptions, there were no new legal or policy mandates as a result of new statutes, proclamations executive orders or court orders not addressed in the plan which could not be addressed through plan maintenance (e.g. newly listed streams with water quality issues) or considered and documented in ongoing implementation actions (e.g. adverse energy impacts). Local review of the revised national fire plan and Healthy Forests Restoration Act requirements could trigger some changes in fuels

management strategies in the Wildland Urban Interface, but would not require changes in the plan

There were potential minor local and discretionary realty action proposals from other agencies or project applicants, but no other immediate needs to amend or revise the RMP were identified. Overall, the Klamath Falls RMP was found to be sufficient to guide management direction for the next five years or longer.

2010 Plan Evaluation

The Klamath Falls Resource Area staff evaluated the implementation of the 1995 Klamath Falls Resource Area RMP from Fiscal Year 2004-2010 using the information in Annual Program Summaries and program-specific records, including National Environmental Policy Act analyses for implementation actions. Appendix 8 contains detailed supporting documentation for the Klamath Falls Resource Area's plan evaluation.

With the exception of the wildlife program (described below), there have been no changes to the 2004 RMP evaluation conclusions regarding program implementation, achievement of RMP objectives, and correctness of RMP decisions.

Wildlife Program - There is new data regarding the 1994 FEIS assumptions for how many acres of northern spotted owl Nesting, Roosting and Foraging Habitat (NRF) would be maintained in the first decade of RMP implementation. The data is not necessarily new but was not reported in the 2004 evaluation.

In the 1994 FEIS, the assumption was made that the amount of nesting, roosting, foraging habitat lost in the first decade would be 1,000 acres or 5% (pg. 4-74 FEIS) of the available nesting, roosting, foraging habitat. Based on Klamath Falls Resource Area consultation documents through 2003, the actual amount of habitat downgraded was 4,731 or 21%. This divergence from the amount of habitat assumed to be maintained in the 2004 FEIS is likely due to determinations made in conjunction with the U.S Fish and Wildlife Service on what constituted suitable habitat post timber harvest. Also, as described in the timber section of the 2004 evaluation and the 2010 evaluation, the amount of overall acres entered for timber harvest was higher than projected in the 1994 FEIS and RMP. The assumptions for habitat retention from the 1994 FEIS were based on projected management prescriptions and habitat goals (FEIS 4-27) but the Representative Timber Management Scenarios were not developed by the time these numbers were calculated. Between 2004 and 2010, an additional 1,347 acres of suitable habitat were downgraded to dispersal habitat. A total of 6,078 acres or 28% of nesting, roosting, and foraging habitat have been downgraded since 1994. .

This difference in the outcome versus the assumptions made in the FEIS needs to be qualified with the fact that the overall determination of what constitutes habitat is somewhat subjective and the determinations that have been made have varied through the years. Additionally, no habitat modeling has been conducted to

determine if any habitat should have been upgraded from dispersal to nesting, roosting, foraging habitat since the implementation of the RMP. A new habitat layer is planned to be developed in 2011 or 2012.

The Klamath Falls Resource Area identified plan amendment or plan maintenance opportunities as described below.

Land Tenure – Through plan amendment, the following lands incorrectly identified as Zone 1 on the land tenure map for the 1995 RMP would be re-classified as Zone 3:

- T37S, R11E, all sections (parcels near Klamath Forest Estates);
- T39S, R12E, Sec. 28, NESW (isolated parcel in Langell Valley).

The following lands were incorrectly identified as Zone 3, and should have been in Zone 1:

- T41S, R10E, Sec. 9, NENE, and Sec. 15, S1/2N1/2.

The interdisciplinary team has reviewed all land tenure designations and has additional recommendations for changes. Some of these are based on Rangeland Health Standards Assessments that include recommendations for some of the small and unmanageable grazing allotments (section 15 grazing lands) and their potential for disposal. Some BLM parcels which are small, intermingled with private land pastures, and have no apparent special purpose, etc., may be recommended for disposal via sale or exchange. These types of recommendations are being made only for the fragmented lands between Klamath Falls and the "Gerber Block." These are relatively minor changes in the RMP that can best be met through a plan amendment.

Klamath Basin Restoration Agreement/Klamath Hydroelectric Settlement Agreement - Implementation of the Klamath Basin Restoration Agreement would affect the Wood River Wetland. It may require a plan revision depending on what is proposed for breaching of levees.

For the Klamath Hydroelectric Settlement Agreement, recreation management of whitewater boating and recreation sites would change. Additionally, a determination of effects to the Klamath River's Outstandingly Remarkable Values would be needed although it is uncertain if it would require a plan revision or amendment.

If hydropower facilities are removed adjacent to the Klamath River bypass reach, then this reach could meet the criteria for an Area of Critical Environmental Concern and Wild and Scenic River designation. A plan amendment or revision would be needed to designate a new Area of Critical Environmental Concern.

There is a potential for transfers of land ownership in the Upper Klamath River Canyon as a result of the agreements. This would likely require a plan

amendment depending on needed changes to land tenure zoning to allow the transfers.

Fish Habitat - The Draft Bull Trout Recovery Plan and Final Rule Bull Trout Critical Habitat designation has occurred since the development of the Klamath Falls RMP. The U.S. Fish and Wildlife Service is in the process of revamping the Recovery Plan for the Lost River and Shortnose suckers.

Forest and Woodland Management – The 1995 RMP does not adequately address managing juniper woodlands. A plan amendment could be completed to establish a land use allocation of juniper woodlands, incorporate direction on priority of woodland types to be treated, the percentage of land to be treated, and the percentage of juniper to be retained.

E. Summary of Findings and Recommendations

The purpose of this plan evaluation was to determine if the 1995 RMP goals and objectives are being met or are likely to be met or if new information indicates a need for new or changed RMP decisions. The evaluation also assessed if changed circumstances or new information so alters the levels or methods of activities or the expected impacts that the environmental consequences of the plan may paint a seriously different picture than those anticipated in the RMP and if there is a significant cause for an amendment or revision of the plan. Finally, this evaluation identified plan maintenance or management actions that could improve implementation of the RMP.

1. Summary of Key Findings

Timber Management

Management decisions for the declared ASQ levels for the timber program have not been achieved. Timber sales associated with the lands allocated to sustained yield timber production have continued to depart substantially from the assumptions of the RMP determination of the Allowable Sale Quantity (ASQ).

- During the evaluation period (2004 – 2010):
  - No district achieved the declared ASQ
  - ASQ regeneration harvest sale volumes were substantially below the assumed levels.
  - ASQ thinning harvest sale volumes were substantially above the assumed levels in the Salem, Eugene, Roseburg, and Coos Bay Districts.
- During the period of 1995 – 2010:
  - Sale acreage from ASQ thinning and regeneration timber sales was substantially above the assumed levels in Medford and Klamath Falls.
  - Thinning sale volume per acre was substantially above the assumed level in Salem, Eugene, Roseburg, and Coos Bay, and substantially below the assumed level in Medford and Klamath Falls.

The ASQ is based on the capacity of the lands, allocated to sustained yield objectives, to produce timber at a level that will remain constant over time. The assumptions for the cycle, intensity, and harvest methods determine the sustainable harvest level from these lands.

The reduced levels of regeneration harvest sales and acceleration of thinning from the harvest land base has been a long-term trend since 1999. Accelerated rates of thinning without replenishment of younger forest stands through regeneration harvest means that opportunities for thinning will eventually be exhausted.

The current approach to a forest management regime that deviates so considerably from the RMP assumptions used in determination of the ASQ is not sustainable at the declared ASQ level.

Wildlife, Botany, Fisheries

Since the previous plan evaluations, there have been new listings, candidate species, conservation strategies/agreements, recovery plans (or draft recovery plans), and designations of critical habitat for the species described below.

- Northern spotted owl
- Marbled murrelet
- Siskiyou Mountain Salamander
- Mardon Skipper
- Pacific fisher
- Fender's blue butterfly
- Cook's desert parsley
- large-flowered wooly meadowfoam
- prairie species of western Oregon and southwestern Washington
- Lower Columbia River Chinook salmon
- Upper Willamette River Chinook salmon
- Columbia River chum
- Southern Oregon/Northern California coast Coho salmon
- Lower Columbia River Coho salmon
- Oregon coast Coho salmon
- Lower Columbia River steelhead trout
- Upper Willamette River steelhead trout
- Southern Green sturgeon
- Oregon chub
- bull trout
- southern Distinct Population Segment of the Pacific eulachon

There is new information and changed circumstances relevant to management objectives and direction for northern spotted owls and land use allocations.

- Population demography of northern spotted owls indicates survival and recruitment continue to decline at a rate greater than predicted in the analysis for the 1995 RMPs.
- The analysis for the 1995 RMPs did not address new information about barred owl effects on northern spotted owl survival and recruitment.
- The U.S. Fish and Wildlife Service completed a Recovery Plan for northern spotted owl in 2011, which includes recovery actions not addressed in the 1995 RMPs.
- 2008 Northern spotted owl critical habitat does not align with land use allocations in the 1995 RMPs. The U.S. Fish and Wildlife Service published a draft rule revising northern spotted owl critical habitat designations in March 2012.
- New information from the 2008 RMP FEIS shows that the 1994 RMP EIS contains outdated analysis of the development of suitable habitat for the northern spotted owl.

New information from the 2011 Northwest Forest Plan Monitoring Report indicates the rates, intensity, and location of forest disturbance may be different than assumed in the 1995 RMP/EIS. The 1995 RMP/EIS assumed northern spotted owl habitat losses due to disturbance of up to 5 percent per decade, with a loss of 2.5 percent from timber harvest and 2.5 percent from wildfire. Actual observed range-wide loss of habitat from all disturbances was estimated at approximately 3.4%. The majority of loss from fire occurred in reserves. Habitat loss was 5% or greater in some reserve areas of southern Oregon. The Northwest Forest Plan strategy assumed that losses would occur within the reserves but if rates exceeded those predicted or were greater in certain areas than predicted, the amount and distribution of habitat may vary significantly from the Northwest Forest Plan. Future plans should consider the spatial context of the reserve system and the disproportionate rate of loss from fire that occurs in the southern areas.

The revision to marbled murrelet critical habitat was completed in October 2011. The revision removes approximately 189,671 acres of forest land in northern California and southern Oregon not associated with the hemlock/tanoak habitat zone from the 3,887,000-acre 1996 critical habitat designation.

Best management practices are now required that avoid or minimize the possibility of unintentional take of eagles if the proposed project has the potential to impact eagles or their habitat.

A national memorandum of understanding between the BLM and the U.S. Fish & Wildlife Service requires the BLM to identify and implement strategies to promote conservation and reduce or eliminate adverse impacts on migratory birds.

There is new information about the importance of nutrition on elk survival and reproduction. The U.S. Forest Service Pacific Northwest Research Station and partners developed a west-side nutrition model that could be used to inform landscape scale planning. Results of the modeling could show the effects of management actions on elk are different than analyzed in the 1994 RMP/EIS.

Vegetation Management using Herbicides

There are new national and Oregon-specific Records of Decision for vegetation treatments using herbicides on BLM lands. These new decisions provide updated standard operating procedures and new mitigation measures. These 2007 and 2010 Records of Decision authorize the use of herbicides for plants other than noxious weeds. However, the primary use of herbicides would still be for noxious weeds and invasive plant control. The 2010 Record of Decision lifted the herbicide injunction that limited BLM to 4 herbicides for spot control of noxious weeds only.

Invasive Species

A 1999 Executive Order requires agencies to use relevant programs and authorities to prevent the introduction of invasive species. The 1995 RMPs established desired outcomes only for noxious weeds.

Biomass
There has been an increasing regional and national emphasis on the use of woody biomass as a value-added woody product and an alternative energy source. The 1995 RMPs lack explicit decisions regarding biomass.

Aquatic and Riparian Habitat
The 2008 RMP FEIS provided new information on BLM's ability to influence aquatic fish habitat and fish populations. The 2008 analysis also showed that over half of BLM lands in western Oregon are located in watersheds where BLM-administered lands comprise less than a third of the watershed. As a result of this ownership pattern, the BLM can only partially influence aquatic and riparian outcomes at the watershed scale. The network of key watersheds as identified under the 1995 RMPs does not match well with streams with high priority fish populations and a high intrinsic potential for fish. The analysis showed that a different restoration strategy is needed to target restoration where it is most effective.

Travel and Transportation Management
New BLM policy for Comprehensive Travel and Transportation Management planning requires that it be incorporated into development of RMPs to consider a broad range of access needs. The policy requires the BLM to generally designate most BLM-administered lands as Off-Highway Vehicle limited areas. The designation of large areas that remain open to unregulated "cross-country travel" is no longer a viable management strategy.

Off Highway Vehicles
Most districts identified a need to review off-highway vehicle designations to reflect new national policy and increased off-highway vehicle use.

Recreation
Many of the potential recreation sites and trails in the 1995 RMPs are no longer valid. New national policies require RMPs to include the following recreation components:

- A 3-tiered classification system for recreation use land use allocations
- Management objectives for interpretation and environmental education, recreation permits
- Designation of historic trails
- Management objectives/direction and area designations for recreation permits

Areas of Critical Environmental Concern
During the 2008 western Oregon plan revision process, newly nominated Areas of Critical Environmental Concern were evaluated to determine if they met the criteria for relevance and importance. These potential ACEC's will receive interim management until a planning decision is made to designate them.

Wild and Scenic Rivers
Some districts have not yet determined if the eligible Wild & Scenic Rivers under the 1995 RMPs meet the criteria for suitability as Wild and Scenic Rivers. There are new river segments that have been identified as eligible or potentially eligible for Wild and Scenic River designation.

Wilderness Characteristics
The BLM must maintain up-to-date wilderness characteristics inventories and consider lands with wilderness characteristics in project analyses and land use plans. Wilderness characteristic inventories conducted for the 2008 RMP revision identified nine areas that contained lands with wilderness characteristics. A planning effort would provide an opportunity to make RMP level decisions about whether to manage these areas to protect their wilderness characteristics.

Fire and Fuels
There have been numerous new national policies that require different RMP decisions and priorities for fire and fuels than occur in the 1955 RMPs. The 2008 RMP FEIS showed that uneven-aged harvest treatments would be effective in reducing the number of acres at risk for high fire severity compared to the implementation of the management direction in the 1995 RMPs. These types of treatments would be most relevant for the Medford District and the Klamath Falls Resource Area.

Vegetation Management in Dry Forests
The 2011 Revised Recovery Plan for northern spotted owl discusses at length the desirability of vegetation management within the range of the northern spotted owl that restores ecological processes and improves the resistance of existing natural vegetation communities to fire and other disturbances. Recovery Actions 7 and 9 creates interagency work groups to assist land managers in developing landscape-level recovery strategies for dry forest management.

An RMP revision would provide an opportunity to review and revise existing RMP objectives and direction in the dry-forest, fire-adapted ecosystem of southwestern Oregon to develop forests that are resilient to disturbances and long-term climate trends, to provide for species conservation, and to provide forest products.

Climate Change and Carbon Storage
The 2008 RMP FEIS showed that the 1995 RMP FEIS analysis of carbon dioxide emissions from timber harvest is out-of-date and incomplete and reached a contrary analytical conclusion. Because the 1995 EIS does not provide an adequate basis for tiering, project-level National Environmental Policy Act analysis has been providing the analysis.

In response to Executive Order 13514 directing federal agencies to reduce their greenhouse-gas emissions, the U.S. Department of the Interior is developing a baseline of existing greenhouse-gas emissions from its activities. The department will be setting

targets for reducing greenhouse-gas emissions though a number of methods including innovative land-use management practices.

Hydrology

The 1995 RMPs do not recognize load targets and priorities associated with Total Maximum Daily Loads (e.g. shade targets and percent effective shade) and associated Water Quality Restoration Plans. Management direction does not sufficiently acknowledge the role of intermittent stream channels in regulating annual water temperature.

The State of Oregon has completed source water assessments since 1995. Source water assessments define groundwater and surface water source areas that supply public drinking water, identify sources of contamination within these areas, and determine the most susceptible areas at risk for contamination within "sensitive areas." The 1995 RMPs did not consider information from source water assessments in land use planning objectives.

The 2008 RMP FEIS analysis of the No Action Alternative (continuation of the 1995 RMPs) estimated riparian reserves associated with stream channel network and fish presence occupy 15% of BLM-administered lands as opposed to the 22% estimated during the Northwest Forest Plan FEIS analysis. This new information has a bearing on the sustainable harvest level that was calculated for each district's RMP (see timber management section).

Soil

The Environmental Impact Statements for the 1995 RMPs contained an objective to maintain and/or improve soil productivity but no management direction or detailed analysis for how soil productivity would be determined. There are new types of equipment for ground-based harvesting and slash reduction that have not been analyzed at the plan level. It is unknown how this new equipment affects the BLM's ability to manage forest and soil resources in the long term. A plan revision would provide an opportunity to provide more specific management direction for soils and could include detailed EIS level analysis on compaction and surface disturbance on soil productivity.

Archeology, Paleontology, Cultural and Historic Uses Including Native American Values

The revised BLM manual for Planning for Uses of Cultural Resources requires specific objectives, land use allocations, and management direction for cultural resources that are not included in the 1995 RMPs. The RMPs do not conform to the requirement to identify places of traditional use and importance to tribes.

Renewable Energy and Adverse Energy Impact Assessments

There have been four national programmatic National Environmental Policy Act compliance and planning efforts (Solar Energy, Wind Energy, Geothermal Leasing, and Energy Corridor Designations) that resulted in standard operating procedures and stipulations should be incorporated into western Oregon RMPs. There have been many

new national policies related to renewable energy development that should be considered in a plan revision.

The national Energy Policy Act was enacted by Congress in 2005. The Act prompted multiple Department of the Interior policy objectives for renewable energy. New guidance on renewable energy siting, leasing stipulations, resource program considerations, energy transmission, and rights-of-way authorizations should be incorporated into the 1995 RMPs.

Minerals and Energy

The 2008 RMP revision included new Reasonably Foreseeable Development scenarios and associated stipulations. They represent the most current science and evaluation of mineral fluid potentials in Western Oregon and should be included in a plan revision.

There have been numerous new national policies related to energy development including fluid mineral stipulations, oil and gas leasing reform, and interagency energy transmission.

The Pacific Connector Gas Pipeline project highlighted the need for RMP direction that acknowledges the unique aspects of long, linear rights-of-way and their potential for impacts on other resources.

District Plan Amendments and Plan Maintenance

Each district identified their need for plan amendments and plan maintenance actions. Some issues are unique to individual districts and some would apply across numerous districts.

<u>Salem District:</u>

- Adjustment of some Late Successional Reserve Boundaries.
- Changes to Off-Highway Vehicle designations.
- Clarify how to apply Riparian Reserve boundaries those BLM-administered lands that are next to streams on private lands.

<u>Eugene District:</u>

- Land Tenure Zone adjustments.

<u>Coos Bay District:</u>

- Management direction to address Sudden Oak Death.
- Conflicts between management direction for Rural Interface Areas and Wildland Urban Interface Areas.
- An updated Coal Bed Methane Gas development scenario.

<u>Roseburg District:</u>

- Designation of existing rock pits as administratively withdrawn lands.
- Management direction to address abandoned mine lands to facilitate clean up.
- Clarification of special habitats management direction.

- Corrections regarding the marbled murrelet bulge (area where Northwest Forest Plan Zone 1 marbled murrelet habitat bulges inland near Roseburg).
- Deletion of references to the outdated Umpqua Corridor Habitat Management Plan.
- Revision of the broad and ambiguous management objective about quality of life for Rural Interface Areas.

Medford District:

- Re-designation of off-highway vehicle areas and establishment of special areas for off-highway vehicle use due to new national policy and increased off-highway vehicle use.
- Management direction addressing the use of firearms in and around the Wildland Urban Interface, recreational sites, and wild and scenic river corridors.
- Resolution of conflicting direction for withdrawals and BLM mineral policy to keep areas open.
- Updates to the reasonably foreseeable development scenarios to address increased locatable mineral activity.
- Updated land use allocations to reflect the new Cascade Siskiyou National Monument and Soda Mountain Wilderness Area.
- Reassessment of riparian and water quality impacts from livestock grazing.
- Reevaluation of baseline data for northern spotted owl habitat.
- Improved management direction for abandoned mine lands.
- Assignment of lands with encroachments to Land Tenure Zone 3.
- Re-designation of Visual Resource Management Classes in relation to the Rogue River and wilderness study areas.

Klamath Falls Resource Area:

- Land Tenure Zone adjustments.
- The Klamath Basin Restoration Agreement/Klamath Hydroelectric Settlement Agreement may require changes to RMP direction and land tenure zones.
- New RMP decisions to address juniper woodlands.

2. Conclusion and Recommendations

These evaluations verified, updated, and refined the 2004 plan evaluation results. The documentation of findings and results focuses on changes to programs since the 2004 evaluations. Data collection focused on the timber program since it had previously been found to diverge from expected outcomes during the 2004 evaluations.

During this evaluation period, management decisions for the declared ASQ levels for the timber program have still not been achieved. Timber sales associated with the lands allocated to sustained yield timber production have continued to depart substantially from the assumptions of the RMP determination of the Allowable Sale Quantity (ASQ).

- During the evaluation period (2004 – 2010):
  - No district achieved the declared ASQ
  - ASQ regeneration harvest sale volumes were substantially below the assumed levels.
  - ASQ thinning harvest sale volumes were substantially above the assumed levels in the Salem, Eugene, Roseburg, and Coos Bay Districts.

- During the period of 1995 – 2010:
  - Sale acreage from ASQ thinning and regeneration timber sales was substantially above the assumed levels in Medford and Klamath Falls.
  - Thinning sale volume per acre was substantially above the assumed level in Salem, Eugene, Roseburg, and Coos Bay, and substantially below the assumed level in Medford and Klamath Falls.

The reduced levels of regeneration harvest sales and acceleration of thinning from the harvest land base has been a long-term trend since 1999. Accelerated rates of thinning without replenishment of younger forest stands through regeneration harvest means that opportunities for thinning will eventually be exhausted. The current approach to a forest management regime that deviates so considerably from the RMP assumptions used in determination of the ASQ is not sustainable at the declared ASQ level.

The O&C Act requires that the annual productive capacity be determined and declared. The ASQ is based on the capacity of the lands, allocated to sustained yield objectives, to produce timber at a level that will remain constant over time. In conjunction, the assumptions for the cycle, intensity, and harvest methods determine the sustainable harvest level from these lands. In simplistic terms, the sustained yield reflects a harvest rate that is in balance with forest growth on the harvest land base.

There is new information and changed circumstances relevant to management objectives and direction for northern spotted owls and associated land use allocations.

- Population demography of northern spotted owls indicates survival and recruitment continue to decline at a rate greater than predicted in the analysis for the 1995 RMPs.
- The analysis for the 1995 RMPs did not address new information about barred owl effects on northern spotted owl survival and recruitment.
- The U.S. Fish and Wildlife Service completed a Recovery Plan for northern spotted owl in 2011, which includes recovery actions not addressed in the 1995 RMPs.
- 2008 Northern spotted owl critical habitat does not align with land use allocations in the 1995 RMPs. The U.S. Fish and Wildlife Service published a draft rule revising northern spotted owl critical habitat designations in March 2012.
- New information from the 2008 RMP FEIS shows that the 1994 RMP EIS contains outdated analysis of the development of suitable habitat for the northern spotted owl.

Changed circumstances and new information have altered the levels of activities and expected outcomes for the timber program and the wildlife program such that the environmental consequences of plan implementation are much different than those anticipated in the RMP.

Similarly, the management direction for most of the other resource management programs needs to be modified or updated because of changed circumstances and new information. Changes are particularly indicated for the fisheries, aquatics, recreation, off-highway vehicle, and fire & fuels programs.

Overall, the 1995 RMPs have become less and less useful as a guide for management actions due to many new BLM policies, new information, and changed circumstances. Plan revisions are appropriate when decision for an entire plan or major portions of the plan no longer serve as a useful guide for resource management.

A plan revision is warranted to comprehensively review the mix of resource uses and protections and to adjust the RMP objectives, land use allocations, and management direction.

Due to the need to model sustainable timber harvest levels for the O&C lands and to analyze range-wide impacts for a number of threatened and endangered species, a planning effort using a regional analysis approach would be most efficient. If it is not possible to complete a planning effort for all six districts simultaneously, a subset of the districts could undertake a planning effort. The primary resource issues that would drive sequencing of RMP revisions would be fire and fuels management and risk of northern spotted owl habitat loss in the dry forests of southern Oregon.

The Medford District also has an imminent need to comprehensively review and adjust off highway vehicle designations and to establish off-highway vehicle special use areas due to rapidly increasing levels of off-highway vehicle use.

Plan revisions typically take three to four years to complete. Districts should assess their need for plan maintenance actions and plan amendments to better implement their RMPs until a plan revision can be completed.

Districts should also review their inventory and data need for golden eagles, road access, visual resource management, wilderness characteristics, fish distribution, stream periodicity, and cultural data/strategic surveys. Most districts have eligible wild and scenic rivers that need to be evaluated for suitability during a planning effort. Districts could prepare for suitability evaluations by gathering the necessary data now.

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Cook, J. G., B. K. Johnson, R. C. Cook, R. A. Riggs, T. I. M. Delcurto, L. D. Bryant, and L. L. Irwin. 2004b. Effects of summer-autumn nutrition and parturition date on reproduction and survival of elk. Wildlife Monographs 155:1-61.

Appendix 1

Western Oregon Districts Plan Evaluation Team

Plan Evaluation Team

Evaluations were completed by each District. Overall coordination was provided by the Oregon State Office (OSO).

An interdisciplinary team was formed to complete the evaluation and included the following individuals:

Oregon State Office
Anne Boeder, Western Oregon Planner, OSO
Chris Cadwell, Forester/Resource Analyst, OSO
Al Doelker, Fisheries Biologist, OSO
Rob Huff, Interagency Special Status Species Conservation Biologist, OSO
Bruce Hollen, Wildlife Biologist, OSO
Lindsey Babcock, Stewardship/Biomass Forester, OSO
Jeanette Griese, Silviculture Forester, OSO
George McFadden, State Silviculturist, OSO
Cathi Bailey, Outdoor Recreation Planner, OSO
Chris Knauf, Recreation Planner for Travel and Transportation, OSO
Jerry Magee, Wilderness NLCS Lead, OSO
Stan McDonald, State Archeologist, OSO
Chester Novak, Water & Riparian Program Lead, OSO
Todd Thompson, Wildlife Biologist, OSO
Jeanne Standley, Invasive Plant Coordinator, OSO
Louisa Evers, Fire Ecologist, OSO
Pam Chappel, Land Law Examiner, OSO
Tim Barnes, Energy Section Chief, OSO
Mark Mousseaux, Botanist & ACECs, OSO
Anita Bilbao, Natural Resource Advisor (Litigation), OSO

Coos Bay District
Steven Fowler, District Planning & Environmental Coordinator
Aimee Hoefs, Acting District Planning & Environmental Coordinator
Mark E. Johnson, District Manager
Kathy Hoffine, Myrtlewood Field Manager
Dennis Turowski, Umpqua Field Manager
Daniel Carpenter, District Hydrologist
Jeff Davis, District Forest Coordinator
Jay Flora, GIS Specialist
Paul Gammon, District Hazardous Material Specialist
Emily Kleber, Geologist
Mike Oxford, District Inventory Specialist
Carolyn Palermo, District Wildlife Biologist
Mike Pope, District Fire Management Specialist
Gloria Robbins, Road Maintenance Manager
Paul Rodriguez, Realty Specialist
Stephen Samuels, District Archeologist

Rick Schultz, District Silviculturalist
Chris Schumacher, Forester
Jeanie Standley, District Weed Specialist & Botany
Dale Stewart, District Soil Scientist
Dan Van Slyke, Fisheries Biologist
Dave Wash, District Recreation Specialist

Eugene District
Richard Hardt, Planner
Eric Greenquist, Wildlife Biologist
Nancy Sawtelle, Botanist
Alan Corbin, Forestry Lead
Mike Kinsey, Fisheries Biologist
Cheryl Adcock, Realty Specialist
Dave Reed, Fire Management Officer
Elizabeth Aleman, Outdoor Recreation Planner
Heather Ulrich, Archeologist
Janet Robbins, Hydrologist
Karin Baitis, Soil Scientist
Phyllis Trimble, Budget Analyst
Walter Smith, Hazardous Materials Coordinator
Christie Hardenbrook, Planner
Sharmila Premdas, Planner

Klamath Falls Resource Area
Mike Bechdolt, Timber Program Management
Debora Boudreau, Lands and Realty Specialist
Brooke Brown, Archaeologist
Matt Broyles, Wildlife Biologist
Madeline Campbell, Silviculturist
Tom Cottingham, Lands, Realty and Hazardous Materials Specialist
Shawnna Dao, Forester
Shane Durant, Forester
Dana Eckard, Range Management, Noxious Weeds, Special Status Plants Specialist
Cindy Foster, Soil Scientist
Andy Hamilton, Hydrologist
Steve Hayner, Wildlife and Special Status Species Management
Don Hoffheins, Planner and Special Area Management
Mike Limb, Geographical Information Specialist
Brian McCarty, Engineering and Transportation
Rob McEnroe, Forester
Tonya Pinckney, Wild Horse management
Rob Roninger, Fisheries Biologist
Scott Senter, Recreation & Visual Resources
Grant Weidenbach, Recreation & River Management Specialist
Julia Zoppetti, Fuels Management Specialist

Medford District
Anthony Kerwin, District Planning and Environmental Coordinator
Bob Pierle, Forester
Frank Hoeper, District Forester (Acting)
Dale Johnson, District Fisheries Biologist
Carole Jorgensen, District Wildlife Biologist
Terry Fairbanks, District Silviculturalist
Chris Dent, District Recreation Planner
Merry Hayden, Archeologist
Susan Fritts, District Botanist (Acting)
Allen Mitchell, District Fire Management Officer
Laurie Lindell, District Hydrologist
Diane Parry, District Geologist
Steve Slavik, District Range Management Specialist

Roseburg District
Rex McGraw, District Planning & Environmental Coordinator (lead)
Paul Ausbeck, District Planning & Environmental Coordinator
Isaac Barner, District Archaeologist
Susan Carter, District Botanist
Dave Fehringer, District Forester
Chris Foster, District Wildlife Biologist
Joe Graham, Forest Inventory Specialist
Eric Heenan, Mining Engineering Technician
Craig Kintop, District Silviculturist
Scott Lightcap, District Fisheries Biologist
Gregg Morgan, District Recreation Planner
Charlene Rainville, District Realty Specialist
Emily Sands, Fire Management Officer

Salem District
Peter Adams, Hydrology and Soils
Rich Hatfield, District Planner
Randy Herrin (retired), Timber
Claire Hibler, Botany and Weeds
Carolina Hooper, Silviculture
Zach Jarrett, Recreation
Roy Price, Wildlife
Bob Ruediger, Fisheries
Heather Ulrich, Cultural

Appendix 2

RMP Evaluation Plan, Questionnaire, and Spreadsheet

Western Oregon RMP Evaluation Plan
January – July, 2011

Evaluation of Coos Bay District, Eugene District, Medford District, Roseburg District, Salem District, and the Klamath Falls Resource Area of the Lakeview District 1995 Resource Management Plans.

Introduction

The BLM Land Use Planning Handbook (H-1601-1 states that RMPs "should be periodically evaluated (at a minimum of every 5 years)." The RMPs for the 6 west-side districts were last evaluated in 2004. The 8th year evaluations found that most resource programs were functioning as anticipated; however, the timber management program departed substantially from expected outcomes for many districts.

An RMP revision effort was completed in December 2008. The new RODs/RMPs were withdrawn by the Department of the Interior in June, 2009.

Due to the withdrawal of the 2008 ROD/RMPs, the districts will continue implementation of the 1995 RMPs. The 5-year evaluation cycle means that evaluations are past due. Evaluations will be completed in FY2011 and will evaluate RMP implementation through FY2010.

Purpose of Western Oregon RMP Evaluations

Evaluation is the process of reviewing RMPs to determine if:

1. Decisions remain relevant to current issues,
2. Decisions are effective in achieving desired outcomes,
3. Any decisions need to be revised,
4. Any decisions need to be dropped from further consideration, and
5. Any areas require new decisions.

RMP Evaluation Process & Schedule

Evaluations will be completed by each District. Overall coordination will be provided by the Oregon State Office (OSO). The schedule is as follows:

November, 2010
- Management Review and Approval of RMP Evaluation Proposal.

December 1-11, 2010 (2 weeks)
- Review proposal and validate data request with program leads and districts.

January 3 – March 18, 2011 (11 weeks)
- Districts complete questionnaire and collect data.
- OSO Lead & District Planner brief district personnel as needed.

March 21 – April 29, 2011 (5 weeks)
- OSO Lead and District Planners consolidate and review data and draft preliminary findings reports.

May 2 – July 1, 2010 (9 weeks)
- Present preliminary findings report to managers and finalize reports.
- Briefings as needed

Following are the BLM's steps for plan evaluations with detailed information about the western Oregon RMP evaluations:

1. ***Identify reasons for evaluating the RMP.***
   - BLM policy states that RMPs "should be periodically evaluated (at a minimum of every 5 years)."
   - RMP Objectives and management direction need to be evaluated against new data and emerging resource issues (e.g. new northern spotted owl information, climate change science & new DOI policy, energy policy, biomass, etc.) to make sure plan decisions are still valid.
   - It will allow us to verify and refine information for the timber program in light of new data and emerging resource issues. We can paint a more explicit picture of the degree harvest has departed from underlying assumptions of the ASQ.
   - A new plan revision process is likely in the near future. A plan evaluation is required prior to plan revisions or major plan amendments to understand why certain RMP objectives have not been met and what issues should be brought forward into the planning process. The plan evaluation serves as the starting point for the preparation plan. The preparation plan serves as the foundation of the entire planning process.
   - A new plan revision or major amendment will take years to complete, the plan evaluation will identify needs for interim plan amendments or maintenance.

2. ***Group plans in a geographic region or planning area to look at issues that cut across boundaries***.
   - The 6 western Oregon RMPs (Klamath Falls Resource Area of the Lakeview District and the Eugene, Salem, Coos Bay, Medford, and Roseburg Districts) will be evaluated. If the need for plan revision and/or amendments is identified, the evaluation will help inform the logical sequence, timing, and groupings for future planning efforts.

3. ***Identify what the evaluation is to measure.***

   Who: Anne Boeder and Chris Cadwell will lead

   - Identify new information or circumstances that would alter the assumptions and conclusions of the 1994 EIS or invalidate the decisions in the 1995 RMPs.
   - The western Oregon RMP Evaluations would verify, update, and refine 2004 evaluation results.
     - Programs functional in 2004 would likely not need to be revisited. District Planners/Resource Leads should confirm this by reviewing the 2004 Evaluation Report for their district and filling out the RMP Evaluation Plan Questionnaire and Spreadsheet.
     - The evaluation would focus on verifying 2004 plan evaluation conclusions for programs not meeting expected outcomes. For most districts, the timber program was determined as not meeting expected outcomes. A list of specific questions and data needs regarding the timber program is included in the RMP Evaluation Plan Questionnaire and Spreadsheet.

4. ***Develop a questionnaire for field office to focus the evaluation.***

   Who: Anne Boeder will lead with district planner input.

5. ***Establish an interdisciplinary team that will complete the evaluation. Team can include state office and field specialists, WO staff, Tribes, other Federal agencies, state and local governments, and the public.***
   Following is a list of the team members along with anticipated workload:
   - Anne Boeder, OSO, Overall Lead (2 Months)
   - Chris Cadwell, OR931 (4 Weeks)
     - Forestry Lead
   - OSO Program Managers, OR930 (2 Weeks)
     - National and state-wide policy review (compile list) as described in step 6.
     - Advice and lead contact for program specific data collection
   - District Planners (3-4 Weeks)
     - District coordination & lead
     - Assist in evaluating and documenting results
     - Assist in writing draft and final evaluation reports
     - Collect RMP evaluation records for the district project file
   - District Resource Leads/GIS specialists (1-2 Weeks)
     - District program review/data collection

6. ***Review published and unpublished documents that implement or support RMP decisions and NEPA analysis. Review implementation plans for new information, new issues, and additional protective management direction.***

   Who: Anne Boeder and OSO Program Leads

   - New ESA related Information (Listings, Critical Habitat, Recovery Plans)
   - BLM and OSO Manuals, Handbooks, Instructional Memorandums
   - Executive Orders, Legislation, Secretarial Direction, BLM National Direction
     - DOI Strategic Plan (Climate Change)
     - Secretarial Order (Climate Change)
     - Sage Grouse, etc.
   - 2008 FEIS conclusions and other new research relevant to 1994 EIS assumptions and conclusions with a focus on: wildlife, water quality and riparian resources, OHV issues, greenhouse gas emissions and climate change, and fire and fuels management.
   - Protests, Appeals, and Litigation trends
   - Northwest Forest Plan Monitoring Reports

7. ***Review NEPA compliance and procedural conformance records (e.g., documentation of land use plan conformance and NEPA adequacy).***

   Who: Anne Boeder will lead with District Planner assistance.

   - National or Regional Programmatic EISs (completed or in-work)

    - National Geothermal Leasing PEIS/Plan Amendments
    - Designation of Energy Corridors on BLM-administered Lands in 11 western states PEIS/Plan Amendments
    - Vegetation Treatments Using Herbicides on BLM lands in 17 western states PEIS/Plan Amendments (and Oregon step-down effort)
    - Palomar, Ruby, Pacific Connector Gas Pipeline Projects; Boardman to Hemingway transmission line Project
- District Annual Program & Monitoring Summaries
- National reviews (Alternative Internal Control Review for NEPA)

8. Complete an evaluation report and document the findings of the evaluation. The report will contain two sections: Issues and needs common to all districts and district-specific issues/needs.

Who: Anne Boeder/Richard Hardt/Chris Cadwell will write the "Common to all Districts" and district planners will write the "District Specific" sections of the report. District planners will review the entire draft report.

9. Develop a communication strategy that addresses distribution of the evaluation findings and/or reports to the public and other stakeholders.

Who: OSO and District Planning and Public Affair Staff

RMP Evaluation Plan – District Questionnaire

1. **Do the 1995 RMP decisions appear to be correct and proper over time (e.g. is there a need for plan amendment or revision)?**
    a. Review 2004 Evaluation Report using "Questions an RMP Evaluation Should Answer" to determine if there is information that would invalidate conclusions from 2004 report (program is achieving identified RMP outcomes/no new RMP direction is needed/RMP EIS analysis is valid).
    b. Districts are not expected to collect new data beyond items in the RMP Evaluation Plan Spreadsheet or as needed under Item C below.
    c. A conclusion that there is new information that would change a program's 2004 evaluation conclusion regarding validity of 1995 decisions should be documented. Provide a narrative along with relevant data. Narrative should describe urgency of the need for changed/new RMP direction and implications if not addressed or delayed.

2. **Are there targeted minor plan amendments or plan maintenance opportunities specific to your district (i.e. updated communication sites, land tenure) that would facilitate RMP implementation? Provide a narrative describing the need and timing.**

3. **Has implementation of the timber harvest program been consistent with the assumptions of the declared Allowable Sale Quantity? Specifically:**

    A. Have the mix of regeneration and thinning harvest in the harvest land base been consistent with the assumptions of the Allowable Sale Quantity (ASQ)?
    B. Has regeneration harvest occurred across the range of age classes as assumed in the ASQ determination?
    C. How much of the annual harvest has come from reserves?
    D. What is the harvest volume trend, for regeneration and thinning harvest, as compared to the ASQ and RMP assumptions?
    E. Have the assumptions for lands available for harvest changed?

The Districts are requested to provide the data for the Timber Resources portion of the RMP Evaluation Plan Spreadsheet to Chris Cadwell by February 4th 2011. In addition to the data in the spreadsheet, the Districts will be requested to provide a short narrative on the status of sales which are:

- no bid,
- re-offers,
- mutually canceled, and
- sold unawarded as of the end of FY2010.

Details of this narrative are outlined in the spreadsheet. A first draft of a narrative to address the 5 questions above will be developed by the OSO based on the data provided by the Districts. The District Forestry staff and Planners will be provided the draft narrative for their review and input before it is finalized.

RMP Objective (Matrix):
Produce a sustainable supply of timber and other forest products.

RMP Management Direction:
Conduct timber harvest and other silvicultural activities in that portion of the Matrix with suitable forest lands according to management actions/direction in the Timber Resources section.

4. **In the Medford District, how does the amount of Northern Spotted Owl habitat lost to wildfires compare to predicted levels described in the Northwest Forest Plan FEIS (P. 3&4 -42)?**

5. **Were there any other programs shown as departing from expected RMP outcomes in the 2004 Plan Evaluations for your district? Determine if they are still departing from expected outcomes and provide a narrative along with relevant data. Provide a narrative along with relevant data. Narrative should describe urgency of the need for changed/new RMP direction and implications if not addressed or delayed**

Questions an RMP Evaluation Should Answer

1. Are management actions outlined in the plan being implemented? Which decisions are not being implemented and why.

2. Does the plan establish desired outcomes (i.e., goals and objectives)?

3. Are the allocations, constraints, or mitigation measures effective in achieving (or making progress towards achieving) the desired outcomes? This determination is often made based on information obtained from resource assessments.

4. Have there been significant changes in the related plans of Indian Tribes, state or local governments, or other Federal agencies?

5. Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?

6. Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? *Note: ACECs must be designated through the land use planning process.*

7. Are new inventories warranted pursuant to the BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

8. Are there new legal or policy mandates as a result of new statutes, proclamations, Executive orders, or court orders not addressed in the plan?

RMP Evaluation Plan Spreadsheet

Part I. All Programs (General)

District	Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
		No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
	Land Use Allocations					
	Watershed Analysis					
	Timber Management					
	Silviculture					
	Forest and Woodlands Management (K Falls)					
	Special Forest Products, Biomass					
	Soils					
	Hydrology					
	Wildlife Habitat					
	Wildlife including Special Status Species					
	Botany including Special Status Species					
	Fisheries including Special Status Species					
	Air Quality and Fire and Fuels					
	Rural Interface					
	Lands and Realty, Special use Permits, Utility Corridors,					
	Roads, Access, Rights-of-Way					
	Recreation					
	Off-highway Vehicle Use					
	Visual Resource Management					
	NLCS (Wilderness, Wild and Scenic Rivers, National Monuments, etc)					
	Areas of Critical Environmental Concern					
	Significant Caves					
	Botany					
	Invasive Species/Noxious Weeds					
	Archeology, Paleontology, Cultural & Historic Resources, including					
	Renewable Energy and Adverse Energy Impact Assessments					
	Rangeland Resources, Livestock Grazing and Wild Horse & Burro					
	Minerals and Energy					
	Hazardous Materials					
	Socioeconomic, Jobs in the Woods, etc.					
	Payments					
	Contracting					
	Management Actions					

***Provide supporting data and narrative**

Part II: District Data Request for Timber Resources

	Sold		Projected *	
Harvest Land Base (ASQ)	Acres	Volume	Acres	Volume
Regeneration Harvest				
Thinning and Density Management				

* Projected = Trim Plus first decade projection times 1.5 (15 years).
If second decade Trim data is available it may be used (optional).
Coos Bay and Eugene:
Prorate Trim Plus data for ASQ before and after 3rd year adjustment.

All volumes rounded to nearest million board feet.

	Sold	Projected
Regeneration Harvest and Age Clas	Acres	Acres
0-70		
80-140		
150-190		
200+		

Provide a short narrative on the number of sales and volume as of the end of FY 2010 which are: No Bid, Sold Unawarded, Contract Cancellations, and Re-Offers.

	Sold	
Reserves	Acres	Volume
LSR		
Riparian Reserve		

Volume by Fiscal Year	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
ASQ Regen																
ASQ Thinning																
Non-ASQ Thinning																
Year	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Evaluation	Third Year				Eighth Year					2011 Evaluation						

Average Annual 1st Decade Projected Volume	
ASQ Regen	
ASQ Thinning	

Appendix 3

Salem District Supporting Data

Table of Contents

Salem District - RMP Evaluation Spreadsheet

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Land Use Allocations	X				LSR adjustments (amendments) were recommended in the Crabtree, Quartzville and Thomas Creek Watershed Analyses
Watershed Analysis	X				
Timber Management			X		More info in tables provided to Chris
Silviculture			X		It is unclear to me from reading the 2004 evaluation if we met or did not meet expectations in 2004. 11 silvicultural practices were evaluated and 2 'met'. So, overall I'd say it did not meet. The reasons for it not meeting now are very much the same as in 2004, however the actual accomplishments are different. The need to do an RMP revision is more pressing than ever.
Forest and Woodlands Management (K Falls)					
Special Forest Products, Biomass	X				
Soils	X				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Hydrology	X				
Wildlife Habitat	X				
Wildlife including Special Status Species	X				
Botany including Special Status Species	X				
Fisheries including Special Status Species	X				Three new fish species listed under ESA since 2004. Critical Habitat designated for six fish species since 2004. One draft recovery plan developed.
Air Quality and Fire and Fuels	X				
Rural Interface	X				
Lands and Realty, Special use Permits, Utility Corridors, Communication Sites	X				
Access, Rights-of-Way	X				
Roads					
Recreation		X			Management Plans completed including (Sandy River Basin)
Off-highway Vehicle Use	X				Review need for amendment of OHV designations: closed/open/restricted.
Visual Resource Management	X				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
NLCS, Wilderness, and Wild and Scenic Rivers		X			Additional Wild and Scenic Rivers designated on district.
Areas of Critical Environmental Concern	X				Lots of Potential ACECs to deal with in Salem
Significant Caves & other NLCS Values	X				
Botany	x				Tier to 2010 ROD for Veg. Trts Using Herbicides in OR.
Invasive Species/Noxious Weeds	x				
Archeology, Paleontology, Cultural & Historic Resources, including Native American Values	X				
Renewable Energy and Adverse Energy Impact Assessments	X				
Rangeland Resources, Livestock Grazing and Wild Horse & Burro Management	X				
Minerals and Energy	X				
Hazardous Materials	X				
Socioeconomic, Jobs in the Woods, etc.	X				
Payments	X				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Contracting	X				
Management Actions	X				

Salem District ACECs

District	Name	Acres	Status*	1995 RMP pages 34 & 35	2008 RMP page 43	1995 +/- Interim Management As shown in Appdx. N. Table N-1. 2008	Existing + Interim Management Acreages increases based on 2006 Evaluations	Year Desig.	Relevant and Important Values	Comments
Salem	Beaver Creek	44	Potential			44	44	2008	Natural Systems	
Salem	Crabtree Complex RNA/ONA		Existing		1231	1231	1231	1983	Natural Systems, Scenic, Botanical, Geological, Lake	2008 is a combination of former Carolyn's Crown RNA from the 1983 MFP and the Crabtree/Shafer ACEC/RNA/ONA from 1995.
Salem	Carolyn's Crown ACEC/RNA		Existing	261				1983	Natural Systems, Scenic, Botanical, Geological, Lake	Included in 2008 Crabtree Complex.
Salem	Crabtree/Shafer Creek ACEC/RNA/ONA		Existing	961				1995	Natural Systems, Scenic, Botanical, Geological, Lake	Included in 2008 Crabtree Complex.
Salem	Crabtree Complex ONA	1033	Existing					1995	Natural Systems, Scenic, Botanical, Geological, Lake	Acres reconfigured to match ONA & RNA parts of complex.

District	Name	Acres	Status*	1995 RMP pages 34 & 35	2008 RMP page 43	1995 +/- Interim Management As shown in Appdx. N. Table N-1. 2008	Existing + Interim Management Acreages increases based on 2006 Evaluations	Year Desig.	Relevant and Important Values	Comments
Salem	Crabtree Complex RNA	198	Existing					1995	Natural Systems, Botanical, Geological, Lake	Acres reconfigured to match ONA & RNA parts of complex.
Salem	Elk Creek	783	Existing	1577	783	784	1577	1983	Wildlife	2006 IDT recommendation & DM concurrence was to reconfigure boundaries to better reflect special management needs. Resulting acreage under this recommendation is 784 acres.
Salem	Forest Peak RNA	155	Existing	134	155	155	155	1995	Natural System, Botanical	
Salem	Grass Mountain RNA	930	Existing	726	930	930	931	1983	Natural System, Botanical	
Salem	High Peak-Moon Creek RNA	1489	Existing	1538	1489	1490	1538	1983	Natural System, Botanical	
Salem	Jackson Bend	15	Existing		15	15	15	1995	Wildlife, Natural System	A Special Area, but not ACEC in the 1995 RMP. Included in the Willamette River Parcels.
Salem	Little North Fork Wilson River	1821	Potential		1821	1822	1822	2008	Wildlife, Natural System	
Salem	Little Grass MT ONA	80	Existing, Proposed to Drop	45		80	45	1995	Scenic, Wildlife, Natural	2006 evaluation IDT determination was that the ACEC does not meet the Importance Criteria and

District	Name	Acres	Status*	1995 RMP pages 34 & 35	2008 RMP page 43	1995 +/- Interim Management As shown in Appdx. N. Table N-1. 2008	Existing + Interim Management Acreages increases based on 2006 Evaluations	Year Desig.	Relevant and Important Values	Comments
									System	recommended to not designate as ACEC in future RMP decisions. The DM agreed with the recommendation to drop the ACEC designation. GIS data doesn't support the 80 acre. In 2005 the Mary's Peak RA proposed altering the boundary to move it from midslope to a definable boundary, but the recommendation in the 2006 evaluation was to drop the ACEC altogether in the next RMP decision. .
Salem	Little Sink RNA	81	Existing	81	81	81	81	1983	Natural Systems, Hazard (Geological Instability)	
Salem	Lost Prairie	60	Existing	58	60	61	61	1983	Natural System, Botanical	
Salem	Lower Scappoose Eagle	179	Potential			179	180	2008	Wildlife	
Salem	Mary's Peak ONA	75	Existing	104	75	75	104	1983	Natural System, Botanical	During 2006 Evaluation the IDT recommended dropping some acres, reducing Existing ACEC size down to 75 acres. Management agreed and also directed the Mary's Peak B, be absorbed into the Mary's Peak ACED during the RMP process – which didn't

District	Name	Acres	Status*	1995 RMP pages 34 & 35	2008 RMP page 43	1995 +/- Interim Management As shown in Appdx. N. Table N-1. 2008	Existing + Interim Management Acreages increases based on 2006 Evaluations	Year Desig.	Relevant and Important Values	Comments
										happen for the 2008 decision.
Salem	Mary's Peak B	353	Potential		353	353	353	2008	Scenic, Wildlife, Natural System	Recommend adding into the Mary's Peak ACEC above at next planning opportunity.
Salem	McCully's Mountain	101	Potential			101	101	2008	Natural System	
Salem	Middle Santiam Terrace	182	Existing	108	182	182	287	1983	Natural System, Botanical	Added adjacent parcel north of river in 2006 Evaluation.
Salem	Mill Creek Ridge	114	Potential		114	114	115	2008	Wildlife, Natural System, Botanical	
Salem	Molalla Meadows	197	Potential		197	205	205	2008	Scenic, Wildlife, Natural Systems	
Salem	Nestucca River	1162	Existing	1062	1162	1163	1162	1983	Natural System, Fisheries, Wildlife and botanical	
Salem	North Santiam	15	Existing, Proposed to Drop	31		15	31	1995	Natural System	Designated as 31 acres, but GIS shows only 15. Maybe a shifting river channel. Would only drop designation

District	Name	Acres	Status*	1995 RMP pages 34 & 35	2008 RMP page 43	1995 +/- Interim Management As shown in Appdx. N. Table N-1. 2008	Existing + Interim Management Acreages increases based on 2006 Evaluations	Year Desig.	Relevant and Important Values	Comments
										under 2008 ROD.
Salem	Rickreall Ridge	368	Existing	177	368	368	368	1983	Botanical, Geological	
Salem	Saddlebag Mountain RNA	300	Existing	151	300	300	300	1983	Natural System, Botanical	
Salem	Sandy River ONA	8827	Existing		8827	9780	9882	1983	Recreation, Botanical Values	400 acres from original Sandy River Gorge ONA and the rest are newer additions covered under interim management.
Salem	Sandy River Gorge ACEC/ONA	400	Existing	400				1983		Original ACEC which was absorbed into the larger Sandy River ONA evaluated for the 2008 ROD.
Salem	Sheridan Peak	310	Existing, Proposed to Drop	299		310	310	1995	Botanical	2006 Evaluation documented that this ACEC no longer meets the criteria for ACEC designation.
Salem	Silt Creek	110	Potential		110	140	140	2008	Natural System, Botanical	GIS data really needs checking as it shows this Potential ACEC being 116 acres, but the DSG_AC shows 1140 acres!
Salem	Snow Peak	1667	Potential			1667	1668	2008	Wildlife, Natural System	
Salem	Soosap Meadows	205	Existing	343	205	343	343	1983	Botanical, Geology	

District	Name	Acres	Status*	1995 RMP pages 34 & 35	2008 RMP page 43	1995 +/- Interim Management As shown in Appdx. N. Table N-1. 2008	Existing + Interim Management Acreages increases based on 2006 Evaluations	Year Desig.	Relevant and Important Values	Comments
Salem	The Butte RNA	39	Existing	40	39	39	40	1983	Natural System, Botanical	
Salem	Valley of the Giants ONA	1311	Existing		1311	1311	1311	1983	Scenic, Wildlife, Natural System, Botanical	Includes original 51 acre ACEC.
Salem	Valley of the Giants ONA		Existing	51				1983		Original ACEC which was absorbed into the larger area evaluated for the 2008 ROD.
Salem	Walker Flat	10	Existing	10	10	11	11	1995	Botanical	
Salem	Waterloo	9	Potential		9	9	9	2008	Natural System, Botanical	
Salem	Well's Island	73	Potential			73	73	2008	Fish and Wildlife, Natural Systems	Included as a Willamette River Special Area in the 1995 RMP, but not specifically named. No 2006 Evaluation record.
Salem	White Rock Fen	55	Existing, Proposed to Drop	51		55	55	1995	Natural System, Botanical	Would only drop ACEC designation under the 2008 ROD.
Salem	Wilhoit Springs	133	Existing, Proposed to Drop	170		133	133	1995	Natural Systems	Would only drop ACEC designation under the 2008 ROD.
Salem	Williams Lake	90	Existing, Proposed to Drop	98		90	89	1995	Natural System, Lake	Would only drop ACEC designation under the 2008 ROD.

District	Name	Acres	Status*	1995 RMP pages 34 & 35	2008 RMP page 43	1995 +/- Interim Management As shown in Appdx. N. Table N-1. 2008	Existing + Interim Management Acreages increases based on 2006 Evaluations	Year Desig.	Relevant and Important Values	Comments
Salem	Yampo	13	Existing	13	13	13	13	1995	Botanical	
Salem	Yaquina Head ONA	91	Existing	106	91	91	106	1983	Coastal Headland, Lighthouse, Natural Systems (Marine Animals, Tide Pools), Botanical	

*Potential ACEC's were proposed under 2008 RMP, and are being managed under 'Interim management' following ACEC policy until RMP legal issues are resolved. "Existing, proposed to drop", are ACEC's that no longer meet the Relevance and Importance criteria, would preclude sustained yield timber production on O&C lands, or don't need special management attention under the 2008 RMP. These too are under interim management.

Salem District – 2010 Resource Management Plan Evaluation
Allowable Sale Quantity Findings

1) Although harvest volume averaged 93% of the ASQ, timber sales associated with the lands allocated to sustained yield timber production have departed substantially from the assumptions used in the RMP determination of the Allowable Sale Quantity (ASQ).

    - **Regeneration Harvest - Below Assumed Level** -The RMP determination of the ASQ assumed 86% of the volume would come from regeneration harvest sales. During the evaluation period, regeneration volume was 13% of the RMP assumed level.

    - **Thinning Harvest - Exceeded Assumed Level** - The RMP determination of the ASQ assumed 14% of the volume would come from thinning harvest sales. During the evaluation period, thinning volume was 575% of the RMP assumed level.

    - **Thinning Volume/Acre - Exceeded Assumed Level** - Thinning sale volume per acre was 203% of the RMP assumed level.

2) The current approach to a forest management regime that deviates so considerably from the RMP assumptions used in determination of the ASQ is not sustainable at the declared ASQ level.

    - The RMP determination of the ASQ is based upon an assumed cycle of regeneration and thinning harvest. Sustainability of the declared ASQ relies on the implementation of the assumed harvest types.

    - The reduced level of regeneration sales has been a trend over the life of the plan.

    - The declared ASQ was based on regeneration harvest of mature forest as the primary source of volume. The ASQ cannot be sustained at the currently declared level if regeneration harvest is not implemented.

    - Regeneration harvest conducted today would provide the stands available for thinning 30 years from now. The implementation trend of lower levels of regeneration harvest will reduce future thinning opportunities.

    - Accelerated rates of thinning without replenishment of younger forest stands through regeneration harvest means that opportunities for thinning will eventually be exhausted.

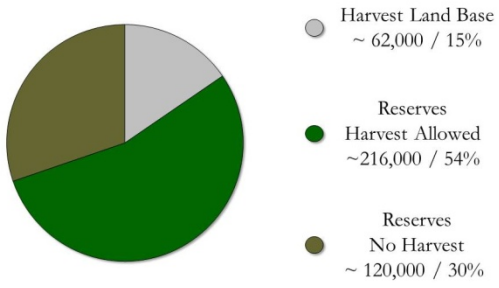
    - Increased volume per acre removed in thinning has long term effects on future thinning and regeneration harvest yields.

Salem District – 2010 Resource Management Plan Evaluation

Timber Resources – Supporting Data

Resource Management Plan Allocations Related to Timber Harvest[1]. Figure 1

The District's 398,100 [2] acres, as related to timber harvest, are described in three categories:



Harvest Land Base – These are the lands which are managed for sustained yield objectives and are the basis for the Allowable Sale Quantity (ASQ). The General Forest Management Areas, Connectivity Diversity Blocks, and Adaptive Management Area (AMA) allocations make up this category. This equates to the Matrix and AMA allocations of the Northwest Forest Plan.

Reserves Harvest Allowed – Harvest is allowed, for reserve land objectives, within Late-Successional[3] and Riparian Reserves. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the reserve allocations. Timber sale volume from reserves does not contribute to the ASQ, because it is not a sustainable source of volume for the long term.

Reserves No Harvest – This category includes: Late-Successional and Riparian Reserves stands over age 80/(110 AMA), recreation sites, lands not suitable for timber production, Areas of Critical Environmental Concern, and other allocations under the RMP in which timber harvest is generally not permitted.

Allowable Sale Quantity – ASQ Declaration

The O&C Act requires that the annual productive capacity be determined and declared. The ASQ is based on the capacity of the lands, allocated to sustained yield objectives, to produce timber at a level that will remain constant over time. The General Forest Management Area, Adaptive Management Area, and Connectivity Diversity Blocks (harvest land base) are the lands allocated for this purpose. In conjunction, the assumptions for the cycle, intensity, and harvest methods determine the sustainable harvest level from these lands. In simplistic terms, the sustained yield reflects a harvest rate that is in balance with forest growth on the harvest land base.

The 1995 Salem District Record of Decision declared the allowable sale quantity of 35 million board feet.

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[1] Harvest Land Base data - 1995 ROD Appendix A-1, Reserves categories estimated based on third-year evaluation age class data.
[2] 1995 ROD Appendix A-1.
[3] Adaptive Management Areas within Late-Successional Reserves (LSRs) are counted as LSRs in the evaluation.

Acronyms / Terminology

- ASQ - Allowable Sale Quantity.
- LSR - Late-Successional Reserves.
- Regeneration – Volume and acres associated with regeneration harvest.
- Thinning – Volume and acres associated with the range of harvest types, including commercial thinning, and density management.
- Evaluation Period – Fiscal years 2004 through 2010. Data is provided for the 16 years since the beginning of the RMP in some cases to provide context.
- Volume – Eastside Scribner 16 foot short log measure.

Evaluation Standards

RMP Assumptions / Projections - The underlying assumptions from the RMP determination of the ASQ are used as the standard to measure plan conformance. These assumptions include the levels of regeneration and thinning harvest volume and the associated treated acres. The term "projections" equates to the RMP assumptions over a period of time such as the evaluation period or the life of the plan.

Sold Timber Sales - The volume and acres associated with sold timber sales are used as the evaluation standard for implementation. Not all sold sale were implemented at the time of the evaluation. There were three sold unawarded sales at the end of fiscal year (FY) 2010. One of these, a 1999 sale, was determined to be un-awardable due to Survey and Manage issues and was canceled. Another was subsequently awarded in FY 2011. The third remains sold but un-awarded. There were no contract cancelations as of the end of FY 2010, although there was one contract default, which returned the uncompleted portion of the contract to BLM. That uncompleted sale was subsequently re-offered and sold.

Disclaimer

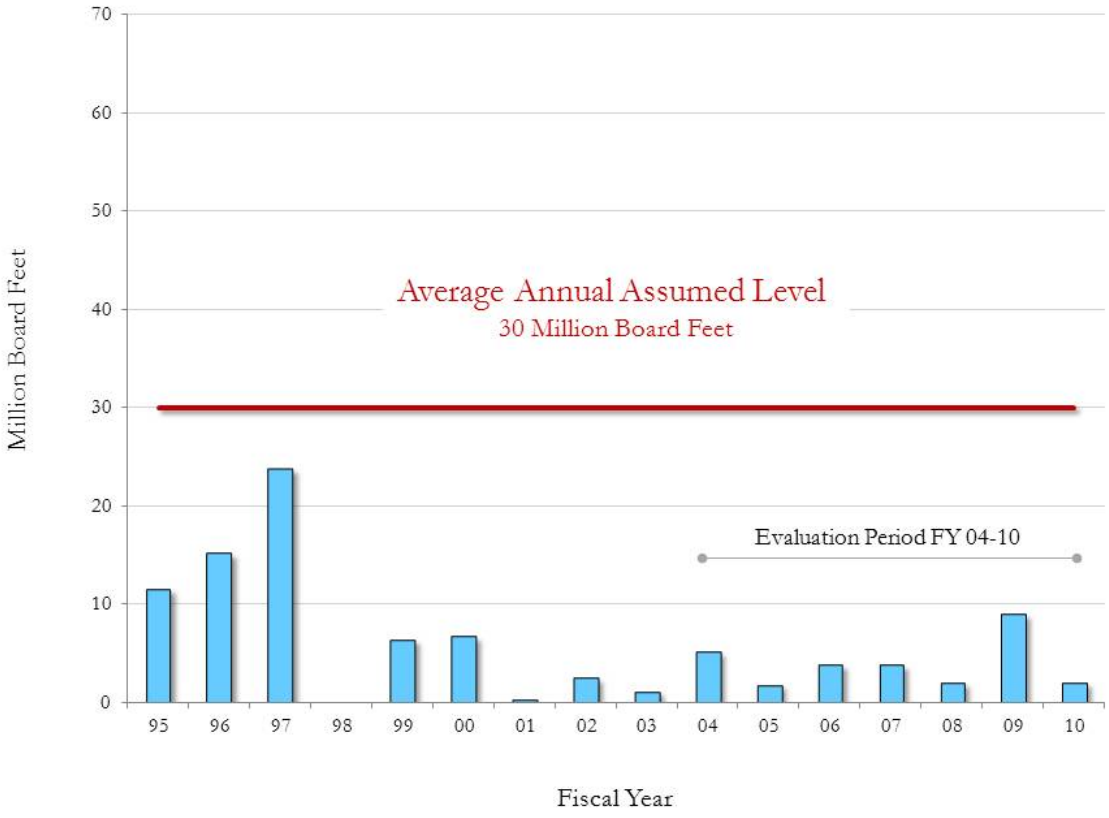
The data in this report was compiled from a variety of sources spanning over 16 years. There may be minor inconsistencies with previously reported information. The purpose of the data in this report is to portray the implementation of the timber sale program and how it conforms to the assumptions of the Resource Management Plans. The display of the data is intended to show the general magnitude for comparison purposes.

Evaluation of Timber Resources

1) ASQ - Regeneration / Thinning Volume and RMP Assumptions

Figure 2 – ASQ Regeneration Volume by Fiscal Year

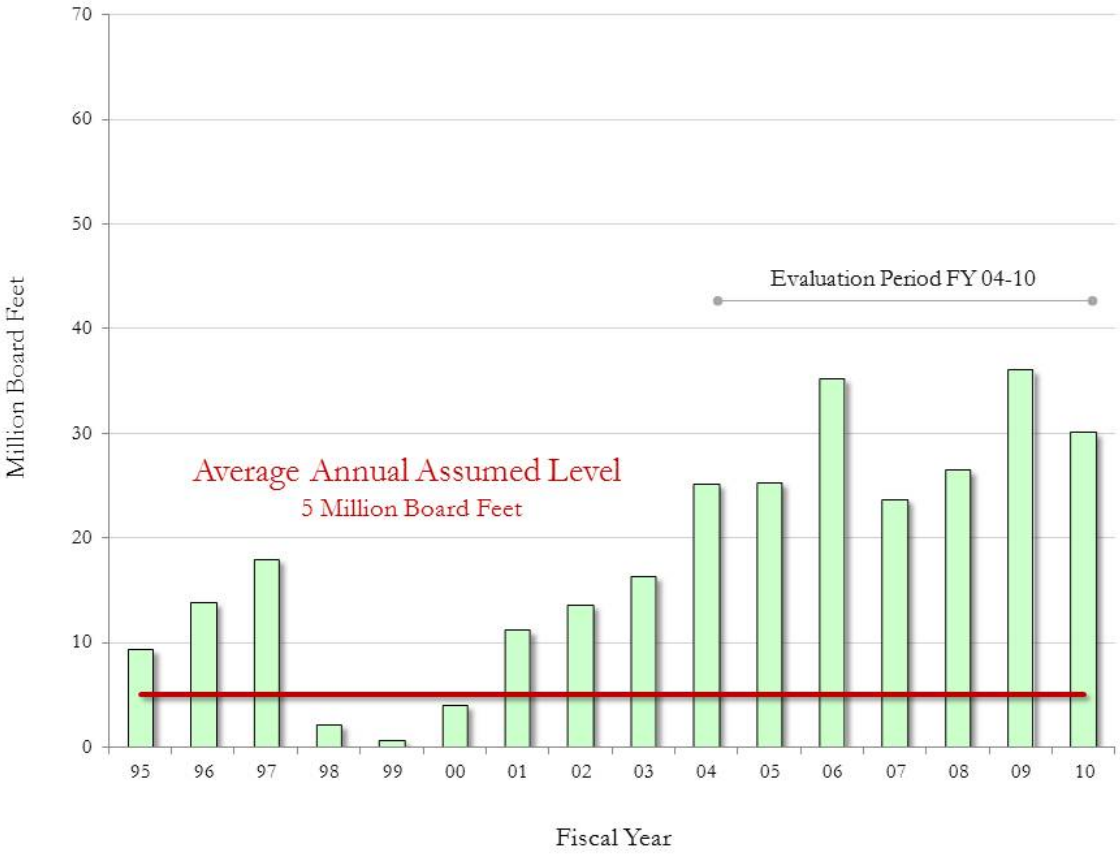
RMP assumed average annual volume level (red) compared with sold volume (blue).



- Regeneration sale volume has not occurred at the RMP assumed level.
- Since 1995, regeneration sale volume has averaged approximately 19% of the RMP assumed level.
- Evaluation Period
  - Regeneration sale volume averaged slightly less than 4 million board feet annually.
  - Regeneration volume was approximately 13% of the RMP assumed level.

Figure 3 – ASQ Thinning Volume by Fiscal Year

RMP assumed average annual volume level (red) compared with sold sale volume (green).



- Since 1995, thinning volume, on average, was 362% of the RMP assumed level.
- Evaluation Period
  - Thinning volume averaged slightly less than 29 million board feet per year.
  - Thinning volume was 575% of the RMP assumed level.

Figure 4 – Total ASQ Volume by Fiscal Year

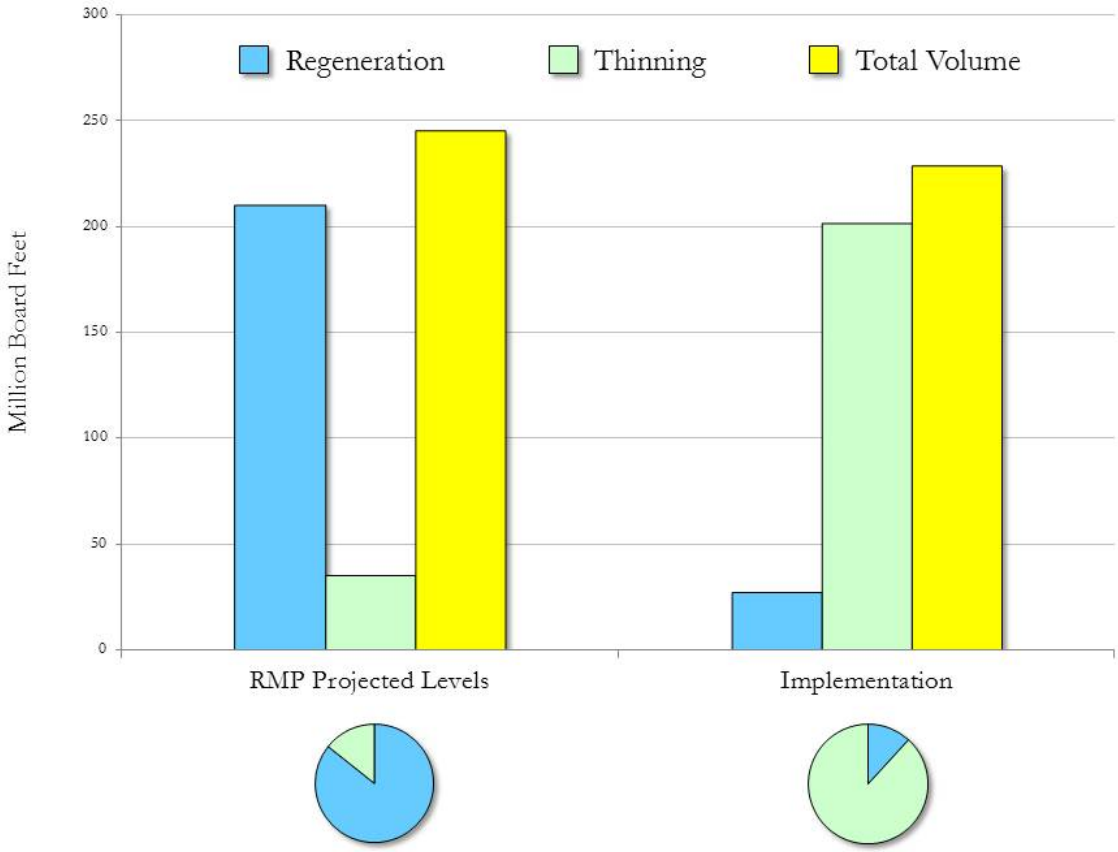
RMP declared Allowable Sale Quantity (purple) as compared with sale volume of regeneration (blue) and thinning (green) by fiscal year.

- The ASQ was achieved during the early years of the RMP with the anticipated ramp-up period.
- Since 1998, the ASQ has not been achieved in ten years and was exceed in two years.
- Evaluation period
    - Sold volume averaged 32.6 million board feet annually.
    - Sold volume was 93% of the ASQ.

Figure 5 – Total ASQ Volume – Evaluation Period - Projected and Implementation.

Left bars and pie - RMP projected assumed levels for the evaluation period.

Right bars and pie - Implementation - timber sales sold during the evaluation period.

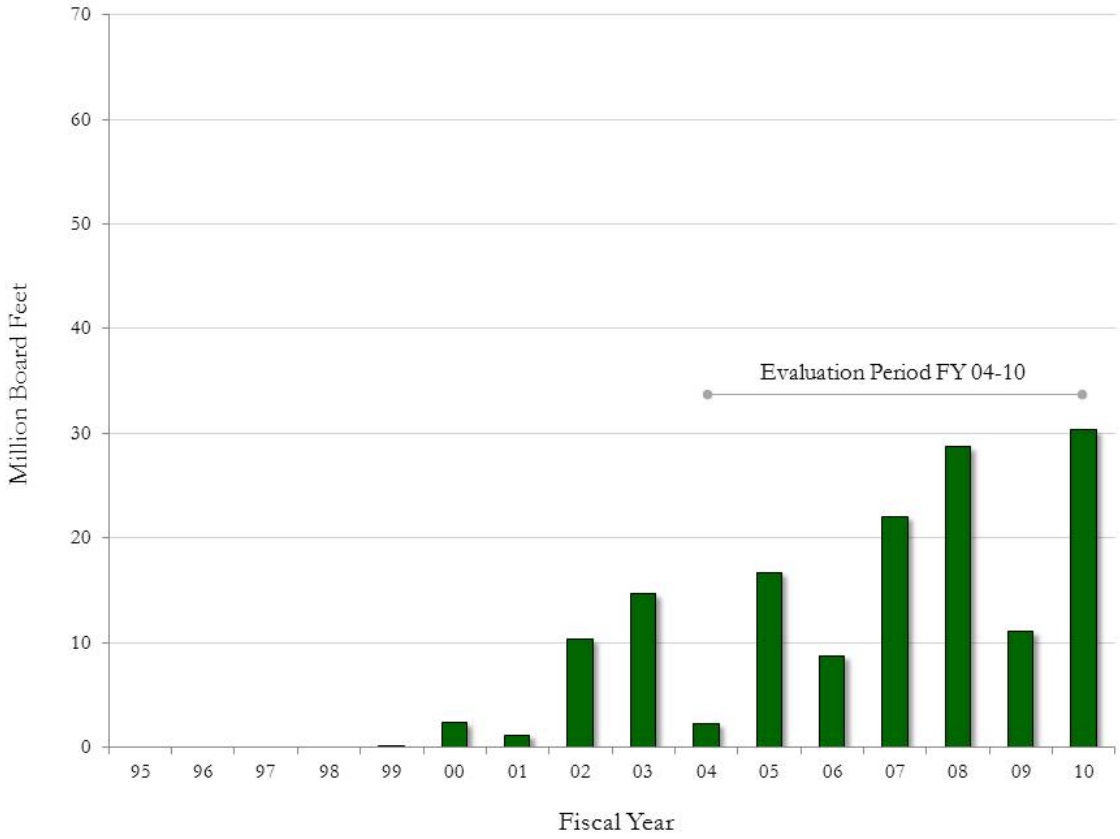


- Evaluation Period
  - Total sold volume was 93% of the RMP projected level.
  - Regeneration volume was approximately 13% of the RMP projected level.
  - Thinning volume was 575% of the RMP projected level.
  - The RMP assumed that 86% of the volume would be from regeneration and 14% from thinning (left pie).
  - Sold sales were 12% regeneration and 88% thinning (right pie).

2) Non-ASQ - Reserve Volume

Harvest is allowed, for reserve land objectives, within LSR and Riparian Reserves. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the reserve allocations. Harvest from reserves does not contribute to the ASQ because it is not planned to be repeated over the long term and thus is not a sustainable source of volume.

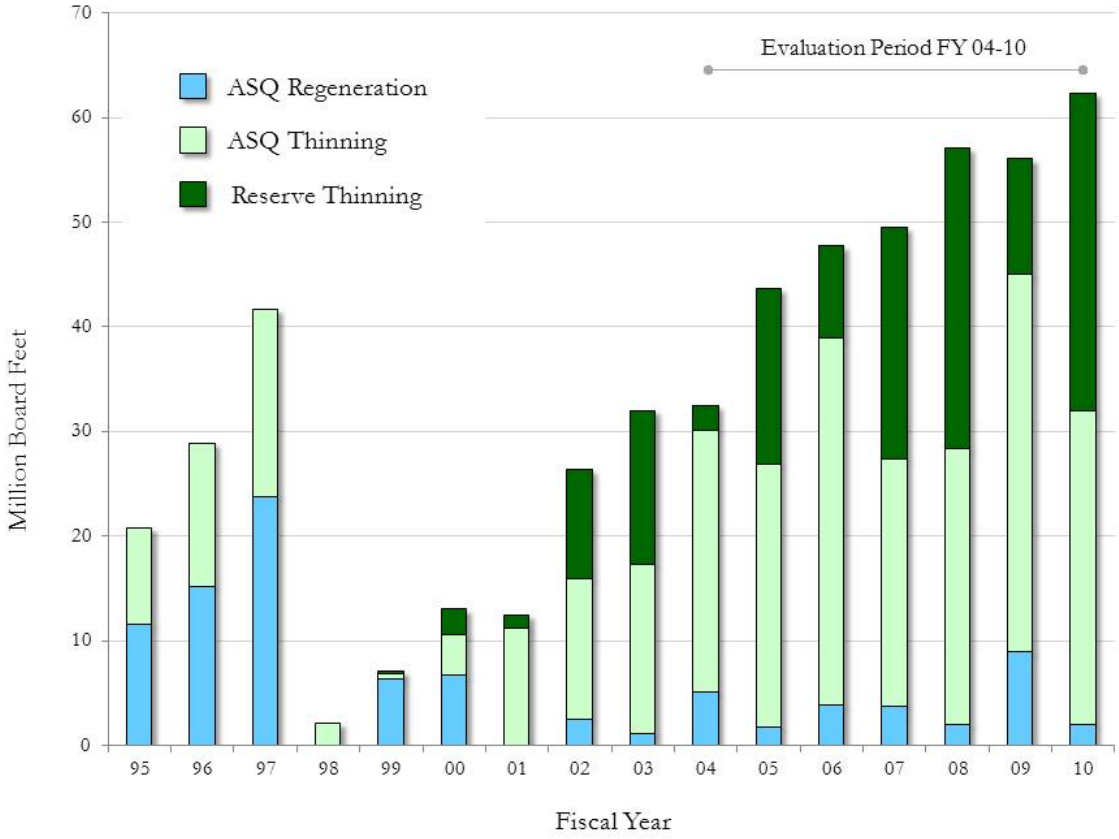
Figure 6 – Reserve Volume by Fiscal Year



- Evaluation Period
  - Total sale volume from reserves averaged approximately 17 million board feet annually.
  - Approximately 120 million board feet was sold from LSR and riparian reserves.

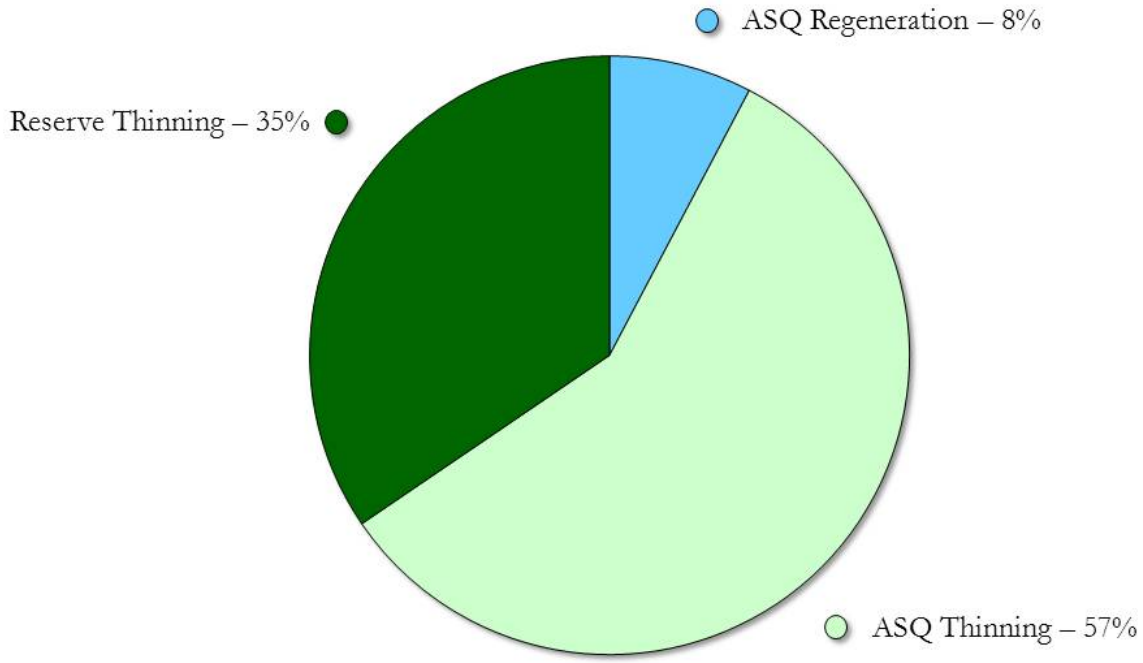
3) Total Volume - ASQ and Reserves

Figure 7 – Total Volume ASQ and Reserves



- Evaluation Period
    - Total volume sold averaged slightly under 50 million board feet annually.
    - ASQ volume sold averaged 32.6 million board feet annually.
    - Reserve volume sold averaged approximately 17 million board feet annually.

Figure 8 – Total Volume - ASQ and Reserves – Evaluation Period



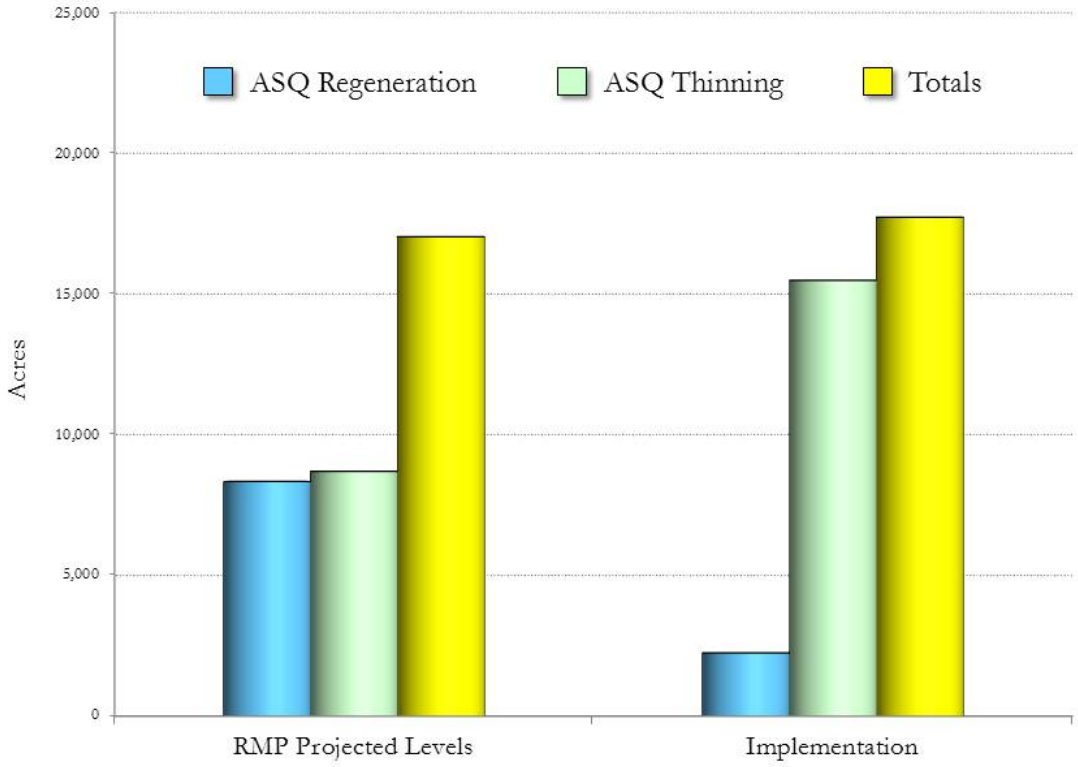
- Evaluation Period
  - 348 million board feet were sold during the evaluation period.
  - ASQ contributed 65% of the total volume sold, 228 million board feet. .
  - Reserves contributed 35% of the total volume sold, 120 million board feet.

4) ASQ Acres – Projected and Implementation

Figure 9 – Total Timber Sale Acres – Harvest Land Base - ASQ

Left bars - RMP projected assumed levels for FY1995-2010.

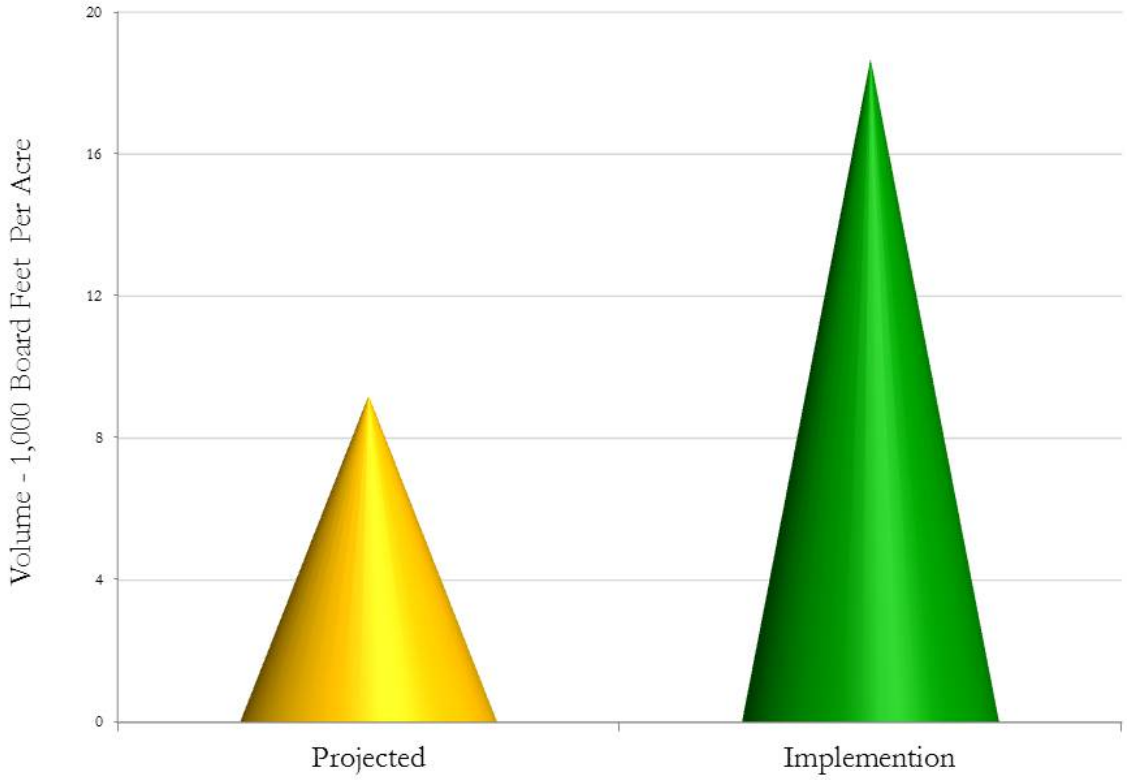
Right bars - Implementation of timber sales sold for FY 1995-2010.



- Fiscal Years 1995 – 2010
  - Regeneration sale acreage was 27% of the RMP projected level.
  - Regeneration sale acreage of stands 150 years and older was 10% of the RMP projected level (not displayed in the graphic).
  - Thinning sale acreage was 178% of the RMP projected level.
  - Total sale acreage was 104% of the RMP projected level.

5) ASQ Thinning Volume Per Acre – Projected and Implementation

Figure 10 – Projected Volume Per Acre and Implementation Fiscal Years 1995 - 2010.



- Fiscal Years 1995 – 2010
    - The determination of the ASQ assumed an average of approximately 9 thousand board feet would be harvested per acre with thinning harvest.
    - Over the life of the plan thinning sales have averaged slightly less than 19 thousand board feet per acre.
    - The ASQ thinning volume per acre was 203% of the RMP projected level.

6) Changed Circumstances and New Information

- In 2008, the U.S. Fish and Wildlife Service designated new critical habitat for the northern spotted owl. This designation precludes sustained-yield timber management and has reduced the land available for harvest by approximately 2% from what was assumed by the 1995 RMP determination of the ASQ.

- The BLM has generally avoided timber sales within the home ranges of known or predicted spotted owl sites to minimize effects on spotted owls and owl habitat. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Management of Survey and Manage sites in the harvest land base was not considered in the determination of the ASQ. As sales are designed and sites are identified, acres are reserved from harvest units. The BLM has also been avoiding timber harvest on lands in the harvest land base which are likely to have occurrences of survey and manage species, because of the necessary investment in surveys and resulting effects of species occurrence on sale viability. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Marbled murrelet sites continue to be identified in the harvest land base, which results in re-designation of harvest land base acres to Late-Successional Reserves. The BLM has also been avoiding timber harvest on lands in the harvest land base which are likely to have occurrences of murrelet sites, because of the necessary investment in surveys and resulting effects of species occurrence on sale viability. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- The BLM has generally avoided regeneration harvest especially regeneration harvest of older forest. This has implications for the sustainability of timber harvest, and has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- The 2008 FEIS evaluated the volume potential utilizing current inventory and improved mapped data on allocations. The 2008 FEIS analysis of continued implementation of the 1995 RMP (i.e., the No Action alternative in the 2008 FEIS) indicated the sustainable harvest level for the Salem District would be 41 million board feet. The 2008 FEIS analysis of continued implementation of the 1995 RMP indicated that there would be a potential non-ASQ harvest of 32 million board feet volume from reserves for the next 20 years.

Appendix 4

Eugene District Supporting Data

Table of Contents

Eugene District – RMP Evaluation Spreadsheet

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Land Use Allocations	x				
Watershed Analysis	x				
Timber Management					will be addressed by OSO
Silviculture					will be addressed by OSO
Forest and Woodlands Management (K Falls)	NA				
Special Forest Products, Biomass	x				
Soils	x				
Hydrology	x				
Wildlife Habitat	x				
Wildlife including Special Status Species	x				
Botany including Special Status Species	x				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Fisheries including Special Status Species	x				
Air Quality and Fire and Fuels	x				
Rural Interface	x				
Lands and Realty, Special use Permits, Utility Corridors, Communication Sites	x				
Roads, Access, Rights-of-Way	x				
Recreation	x				
Off-highway Vehicle Use	x				
Visual Resource Management	x				
NLCS (Wilderness, Wild and Scenic Rivers, National Monuments, etc.)	x				
Areas of Critical Environmental Concern	x				
Significant Caves	x				
Botany	x				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Invasive Species/Noxious Weeds	x				
Archeology, Paleontology, Cultural & Historic Resources, including Native American Values	x				
Renewable Energy and Adverse Energy Impact Assessments	x				
Rangeland Resources, Livestock Grazing and Wild Horse & Burro Management	NA				
Minerals and Energy	x				
Hazardous Materials	x				
Socioeconomic, Jobs in the Woods, etc.	x				
Payments	x				
Contracting	x				
Management Actions	NA				
***Provide supporting data and narrative**					

Eugene District ACECs

District	Name	Acres	Status	Year Designated	Relevant and Important Values
Eugene	Camas Swale RNA	308	Existing	1995	Natural Systems, Botanical
Eugene	Coburg Hills Relict Forest Island	855	Existing, Proposed to Drop	1995	Wildlife, Natural Systems
Eugene	Cottage Grove Lake Relict Forest Island	15	Existing	1995	Wildlife, Natural Systems
Eugene	Cottage Grove Old Growth	76	Existing, Proposed to Drop	1995	Wildlife, Natural Systems
Eugene	Cougar Mountain Yew Grove	90	Existing	1995	Natural Systems, Botanical
Eugene	Dorena Lake Relict Forest Island	18	Existing, Proposed to Drop	1995	Wildlife, Natural Systems
Eugene	Dorena Prairie	8	Potential	2008	Natural Systems, Botanical
Eugene	Esmond Lake	86	Potential	2008	Wildlife, Natural Systems
Eugene	Fox Hollow RNA	159	Existing	1995	Natural Systems, Botanical
Eugene	Grassy Mountain	74	Existing	1995	Scenic, Natural Systems, Botanical
Eugene	Heceta Sand Dunes ONA	210	Existing	1995	Scenic, Natural Systems, Botanical
Eugene	Horse Rock Ridge RNA	378	Existing	1995	Scenic, Natural Systems, Botanical
Eugene	Hult Marsh	177	Existing	1995	Scenic, Natural Systems, Aquatic
Eugene	Lake Creek Falls	54	Existing, Proposed to Drop	1995	Natural Hazard

District	Name	Acres	Status	Year Designated	Relevant and Important Values
Eugene	Long Tom	8	Existing	1995	Natural Systems, Botanical
Eugene	Lorane Ponderosa Pine	104	Potential	2008	Natural Systems, Botanical
Eugene	Low Elevation Headwaters of the McKenzie River	9765	Potential, Proposed to Drop	2008	Scenic, Wildlife, Natural Systems
Eugene	McGowan Meadow	38	Potential	2008	Natural Systems, Botanical
Eugene	Mohawk RNA	290	Existing	1995	Natural Systems, Botanical
Eugene	Oak Basin Prairies	223	Potential	2008	Wildlife, Natural Systems, Botanical
Eugene	Taylor Creek	155	Potential	2008	Fisheries and Wildlife
Eugene	Upper Elk Meadows RNA	217	Existing	1995	Natural Systems, Botanical
Eugene	Willamette Valley Prairie/Oak and Pine Area	1486	Potential	2008	Natural Systems, Botanical

*Potential ACEC's were proposed under 2008 RMP, and are being managed under 'Interim management' following ACEC policy until RMP legal issues are resolved. "Existing, proposed to drop", are ACEC's that no longer meet the Relevance and Importance criteria, would preclude sustained yield timber production on O&C lands, or don't need special management attention under the 2008 RMP. These too are under interim management.

Eugene District – 2010 Resource Management Plan Evaluation
Allowable Sale Quantity Findings

1) Timber sales associated with the lands allocated to sustained yield timber production have departed substantially from the assumptions used in the RMP determination of the Allowable Sale Quantity (ASQ).

    - **ASQ Not Achieved** - During the evaluation period, sale volume was 76% of the declared ASQ.

    - **Regeneration Harvest - Below Assumed Level** - The RMP determination of the ASQ assumed 71% of the volume would come from regeneration harvest sales. During the evaluation period, regeneration volume was 10% of the RMP assumed level.

    - **Thinning Harvest - Exceeded Assumed Level** - The RMP determination of the ASQ assumed 29% of the volume would come from thinning sales. During the evaluation period, thinning volume was 238% of the RMP assumed level.

    - **Thinning Volume/Acre - Exceeded Assumed Level** - Thinning sale volume per acre was 128% of the RMP assumed level.

2) The current approach to a forest management regime that deviates so considerably from the RMP assumptions used in determination of the ASQ is not sustainable at the declared ASQ level.
    - The RMP determination of the ASQ is based upon an assumed cycle of regeneration and thinning harvest. Sustainability of the declared ASQ relies on the implementation of the assumed harvest.

    - The reduced level of regeneration sales has been a trend since 1997.

    - The declared ASQ was based on regeneration harvest of mature forest as the primary source of volume. The ASQ cannot be sustained at the currently declared level if regeneration harvest is not implemented.

    - Regeneration harvest conducted today would provide the stands available for thinning 30 years from now. The implementation trend of lower levels of regeneration harvest will reduce future thinning opportunities.

    - Accelerated rates of thinning without replenishment of younger forest stands through regeneration harvest means that opportunities for thinning will eventually be exhausted.

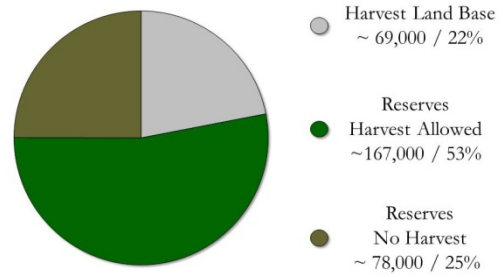
    - Increased intensity of thinning has long term effects on future thinning and regeneration harvest yields.

Eugene District – 2010 Resource Management Plan Evaluation

Timber Resources – Supporting Data

Resource Management Plan Allocations Related to Timber Harvest[1]. Figure 1

The District's 314,100 acres, as related to timber harvest, are described in three categories:



Harvest Land Base – These are the lands which are managed for sustained yield objectives and are the basis for the Allowable Sale Quantity (ASQ). The General Forest Management Areas, Connectivity Diversity Blocks, and Adaptive Management Area (AMA) allocations make up this category. This equates to the Matrix and AMA allocations of the Northwest Forest Plan.

Reserves Harvest Allowed – Harvest is allowed, for reserve land objectives, within Late-Successional and Riparian Reserves. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the reserve allocations. Timber sale volume from reserves does not contribute to the ASQ, because it is not a sustainable source of volume for the long term.

Reserves No Harvest – This category includes: Late-Successional and Riparian Reserves stands over age 80, recreation sites, lands not suitable for timber production, Areas of Critical Environmental Concern, and other allocations under the RMP in which timber harvest is generally not permitted.

Allowable Sale Quantity – ASQ Declaration

The O&C Act requires that the annual productive capacity be determined and declared. The ASQ is based on the capacity of the lands, allocated to sustained yield objectives, to produce timber at a level that will remain constant over time. The General Forest Management Area, Adaptive Management Area, and Connectivity Diversity Blocks (harvest land base) are the lands allocated for this purpose. In conjunction, the assumptions for the cycle, intensity, and harvest methods determine the sustainable harvest level from these lands. In simplistic terms, the sustained yield reflects a harvest rate that is in balance with forest growth on the harvest land base.

The Eugene District Record of Decision declared the allowable sale quantity of 36 million board feet in 1995. The evaluation of the RMP in 1998 reduced the ASQ to 33 million board feet to account for deferrals to meet management action/direction for retention of late-successional forest[2] and reductions in the harvest land base for the creation of additional late-successional reserves for Marbled Murrelet sites identified after 1995.

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[1] Harvest Land Base data - 1995 ROD Table 1, Reserves categories estimated based on third-year evaluation age class data.

[2] 15% Standard and Guide, retention of 25% late-successional forest in Connectivity/Diversity Blocks

Acronyms / Terminology

- ASQ - Allowable Sale Quantity.
- LSR - Late-Successional Reserves.
- Regeneration – Volume and acres associated with regeneration harvest.
- Thinning – Volume and acres associated with the range of harvest types, including commercial thinning, and density management.
- Evaluation Period – Fiscal years 2004 through 2010. Data is provided for the 16 years since the beginning of the RMP in some cases to provide context.
- Volume – Eastside Scribner 16 foot short log measure.

Evaluation Standards

RMP Assumptions / Projections - The underlying assumptions from the RMP determination of the ASQ are used as the standard to measure plan conformance. These assumptions include the levels of regeneration and thinning harvest volume and the associated treated acres. The term "projections" equates to the RMP assumptions over a period of time such as the evaluation period or the life of the plan.

Sold Timber Sales - The volume and acres associated with sold timber sales are used as the evaluation standard for implementation. Not all sold sales were implemented at the time of the evaluation. As of the end of fiscal year 2010, one sale totaling approximately 3.5 million board feet was sold but not awarded.

Disclaimer

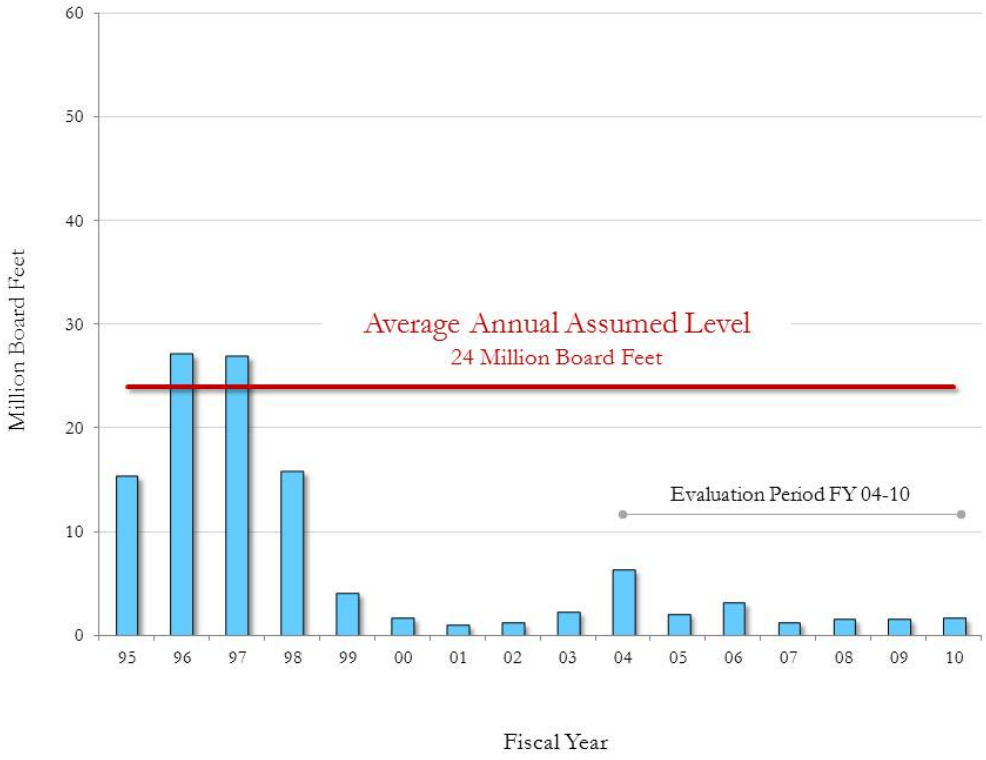
The data in this report was compiled from a variety of sources spanning over 16 years. There may be minor inconsistencies with previously reported information. The purpose of the data in this report is to portray the implementation of the timber sale program and how it conforms to the assumptions of the Resource Management Plans. The display of the data is intended to show the general magnitude for comparison purposes.

Evaluation of Timber Resources

1) ASQ - Regeneration / Thinning Volume and RMP Assumptions

Figure 2 – ASQ Regeneration Volume by Fiscal Year

RMP assumed average annual volume level[3] (red) compared with sold volume (blue).

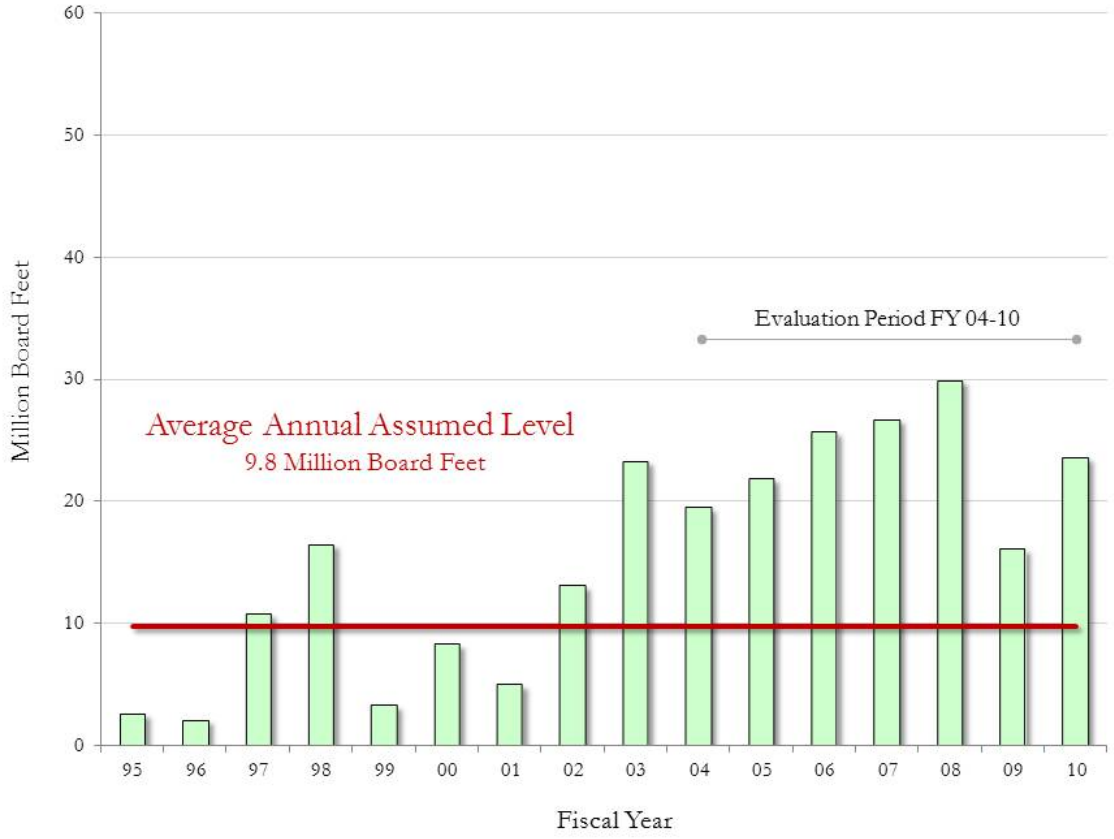


- Regeneration volume, with the anticipated plan ramp-up period, was consistent with the RMP assumed level in the early years of the plan.
- Regeneration volume has not achieved the RMP assumed level since 1997.
- Since 1995, and during the evaluation period regeneration sale volume has averaged approximately 29% of the RMP assumed level. Most of the regeneration sale volume occurred in the early years of the plan.
- Evaluation Period
  - Regeneration volume averaged 2.5 million board feet per year.
  - Regeneration volume was approximately 10% of the RMP assumed level.

[3] Average of regeneration level associated with 1995-1998 ASQ (36MMBF), 1999-2010 (33MMBF)

Figure 3 – ASQ Thinning Volume by Fiscal Year

RMP assumed average annual volume level[4] (red) compared with sold sale volume (green).

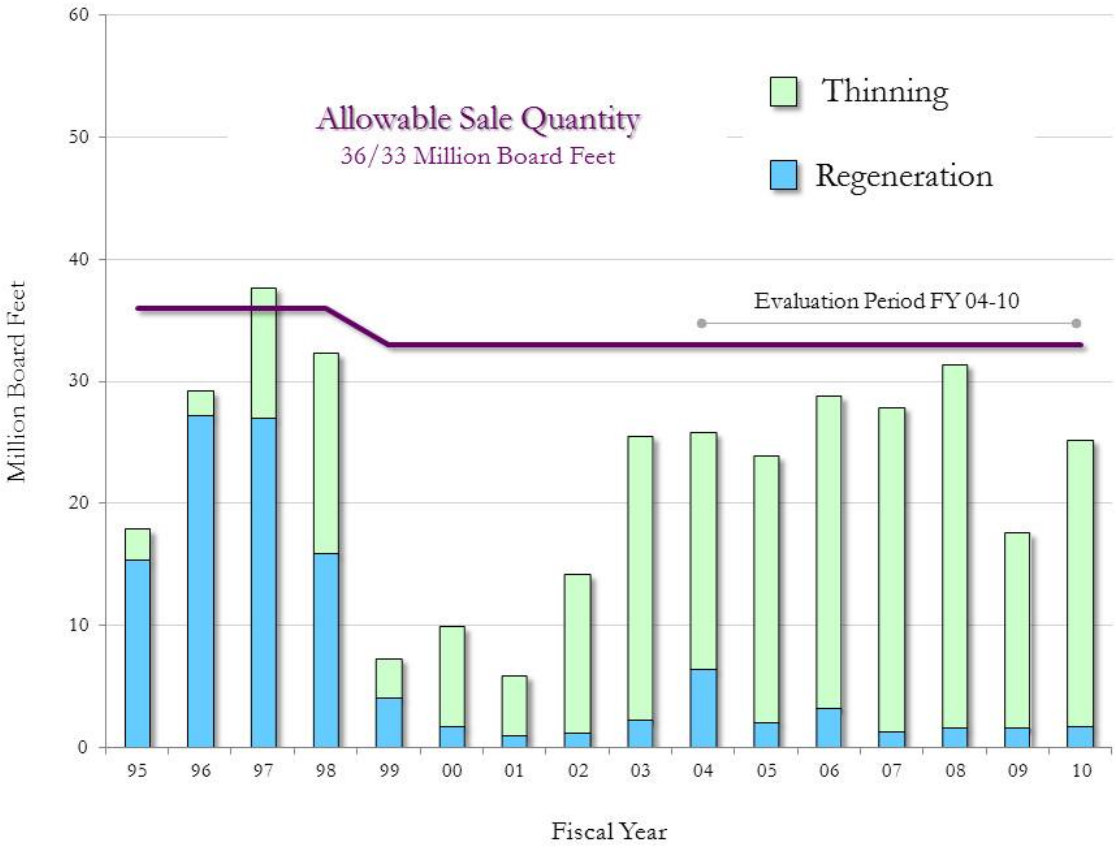


- Since 1995, thinning sale volume was 158% of the RMP assumed level.
- Evaluation Period
  - Thinning volume averaged slightly over 23 million board feet per year.
  - Thinning volume was 238% of the RMP assumed level.

[4] Average of thinning level associated with 1995-1998 ASQ (36MMBF), 1999-2010 (33MMBF)

Figure 4 – Total ASQ Volume by Fiscal Year

RMP declared Allowable Sale Quantity (purple) as compared with sale volume of regeneration (blue) and thinning (green) by fiscal year.

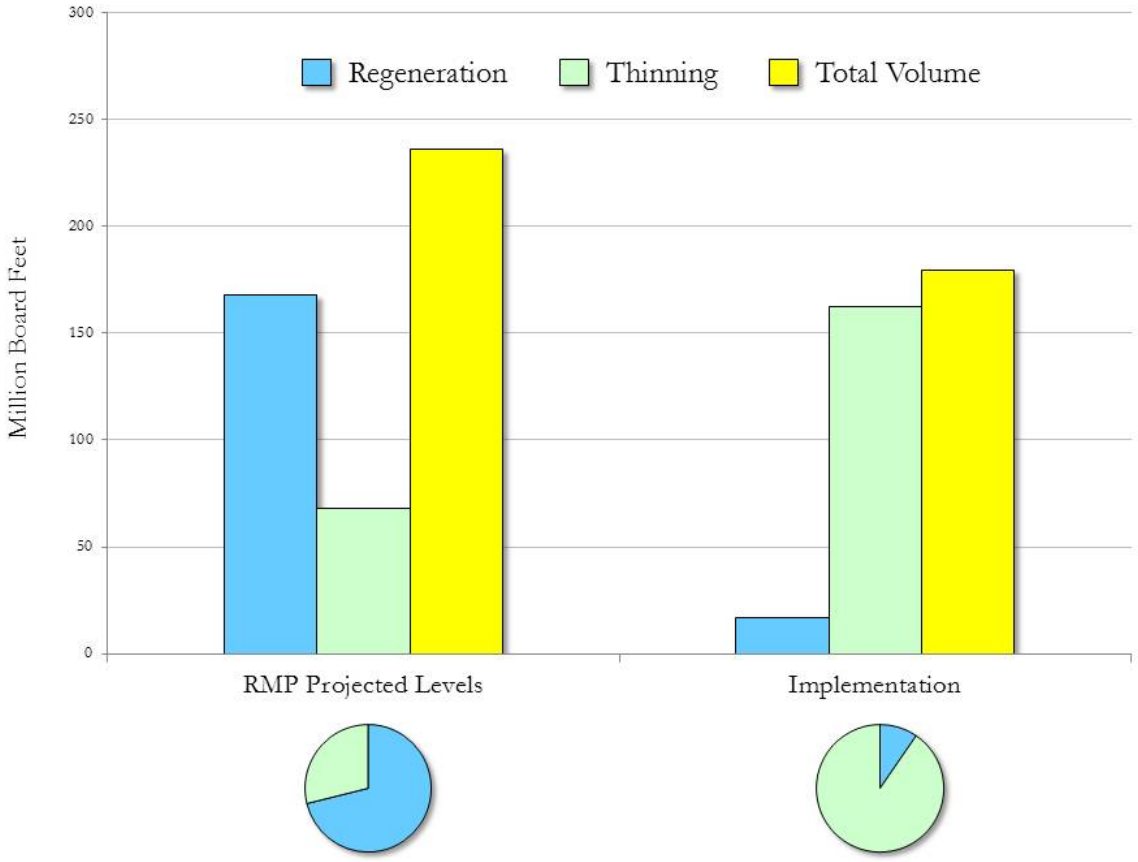


- The ASQ was generally achieved during the early years of the RMP with the anticipated ramp-up period.
- Since 1997, the ASQ has not been achieved.
- Evaluation period
    - Sold volume averaged approximately 25.7 million board feet annually.
    - Sold volume was 76% of the ASQ.

Figure 5 – Total ASQ Volume – Evaluation Period - Projected and Implementation.

Left bars and pie - RMP projected assumed levels for the evaluation period.

Right bars and pie - Implementation - timber sales sold during the evaluation period.

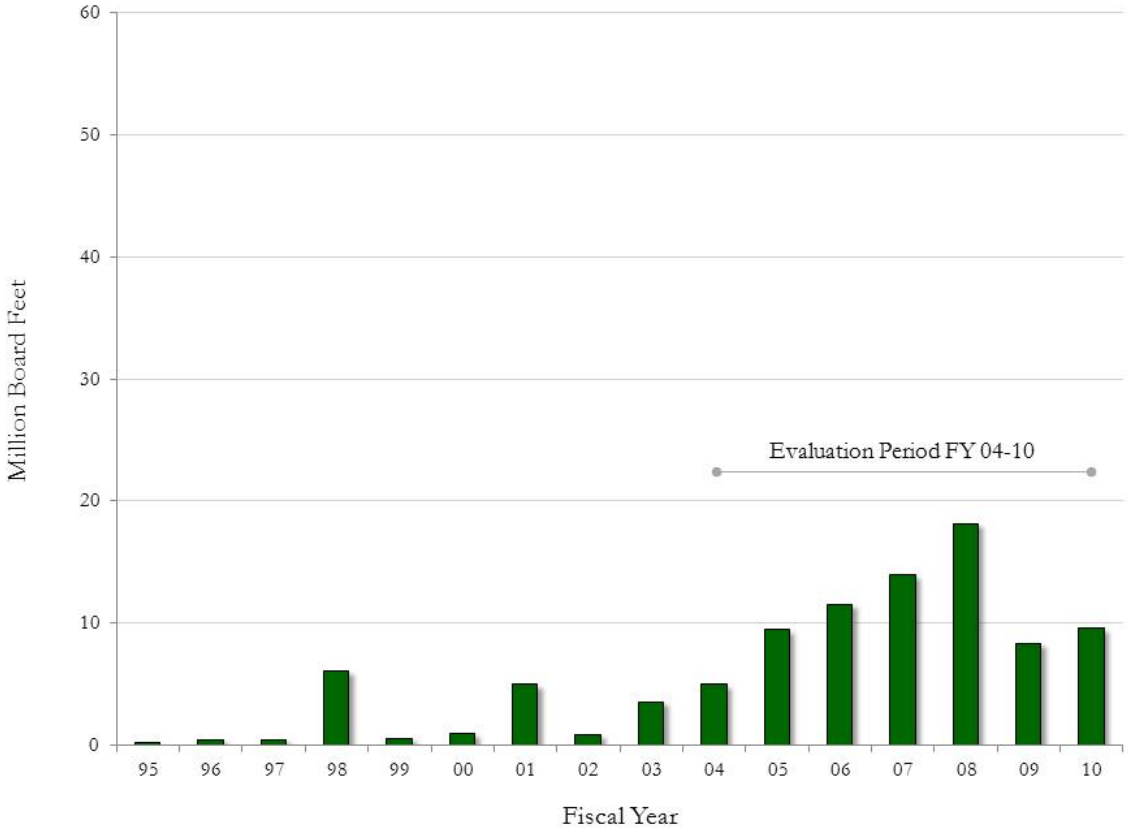


- Evaluation Period
  - Total sold volume was 76% of the RMP projected level.
  - Regeneration volume was 10% of the RMP projected level.
  - Thinning volume was 238% of the RMP projected level.
  - The RMP assumed that 71% of the volume would be from regeneration and 29% from thinning (left pie).
  - Sold sales were 10% regeneration and 90% thinning (right pie).

2) Non-ASQ - Reserve Volume

Harvest is allowed, for reserve land objectives, within LSR and Riparian Reserves. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the reserve allocations. Harvest from reserves does not contribute to the ASQ because it is not planned to be repeated over the long term and thus is not a sustainable source of volume.

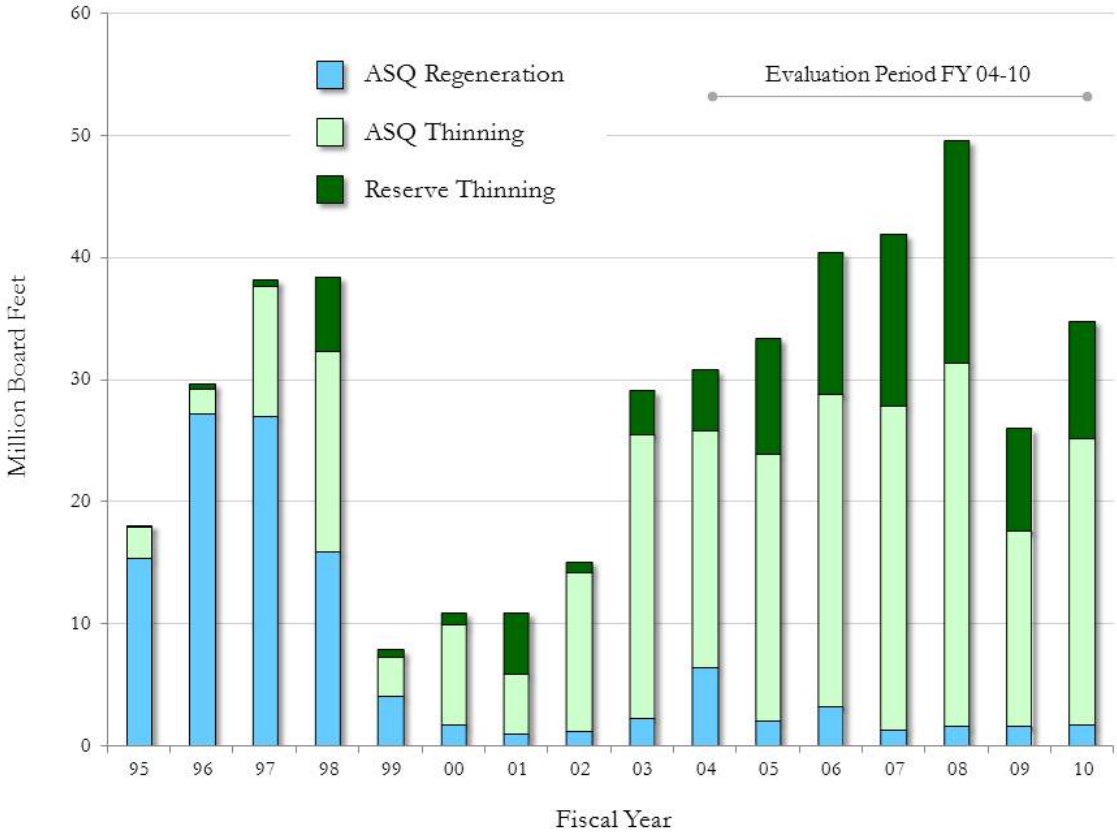
Figure 6 – Reserve Volume by Fiscal Year



- Evaluation Period
    - Sale volume from reserves averaged approximately 11 million board feet annually, 76 million board feet total.

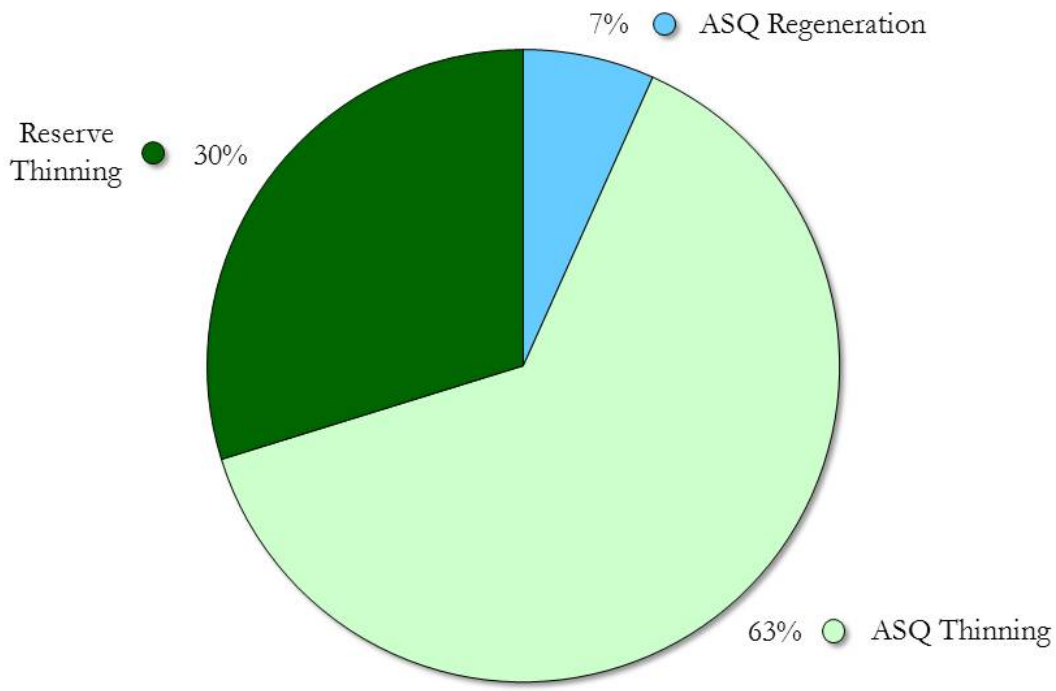
3) Total Volume - ASQ and Reserves

Figure 7 – Total Volume ASQ and Reserves



- Evaluation Period
    - Total volume sold averaged approximately 37 million board feet annually.
    - ASQ volume sold averaged approximately 26 million board feet annually.
    - Reserve volume sold averaged approximately 11 million board feet annually.

Figure 8 – Total Volume - ASQ and Reserves – Evaluation Period



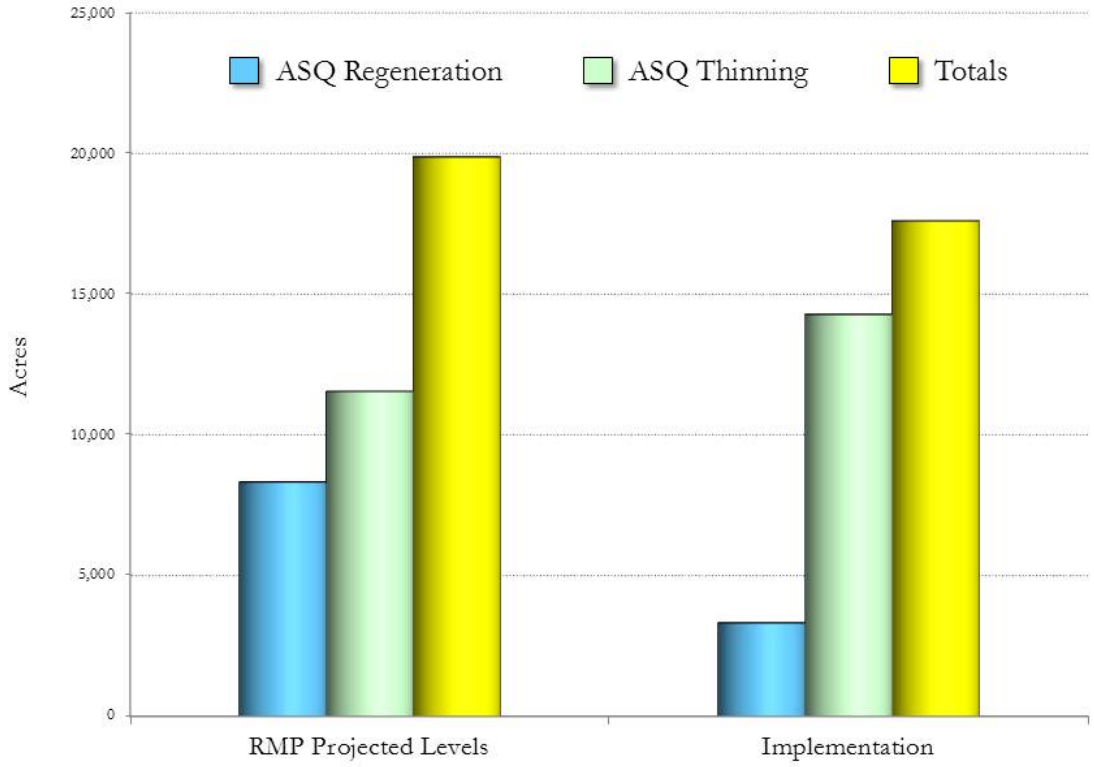
- Evaluation Period
  - 256 million board feet were sold during the evaluation period
  - ASQ contributed 70% of the total volume sold, 180 million board feet.
  - Reserves contributed 30% of the total volume sold, 76 million board feet.

4) ASQ Acres – Projected and Implementation

Figure 9 – Total Timber Sale Acres – Harvest Land Base - ASQ

Left bars - RMP projected assumed levels for FY1995-2010.

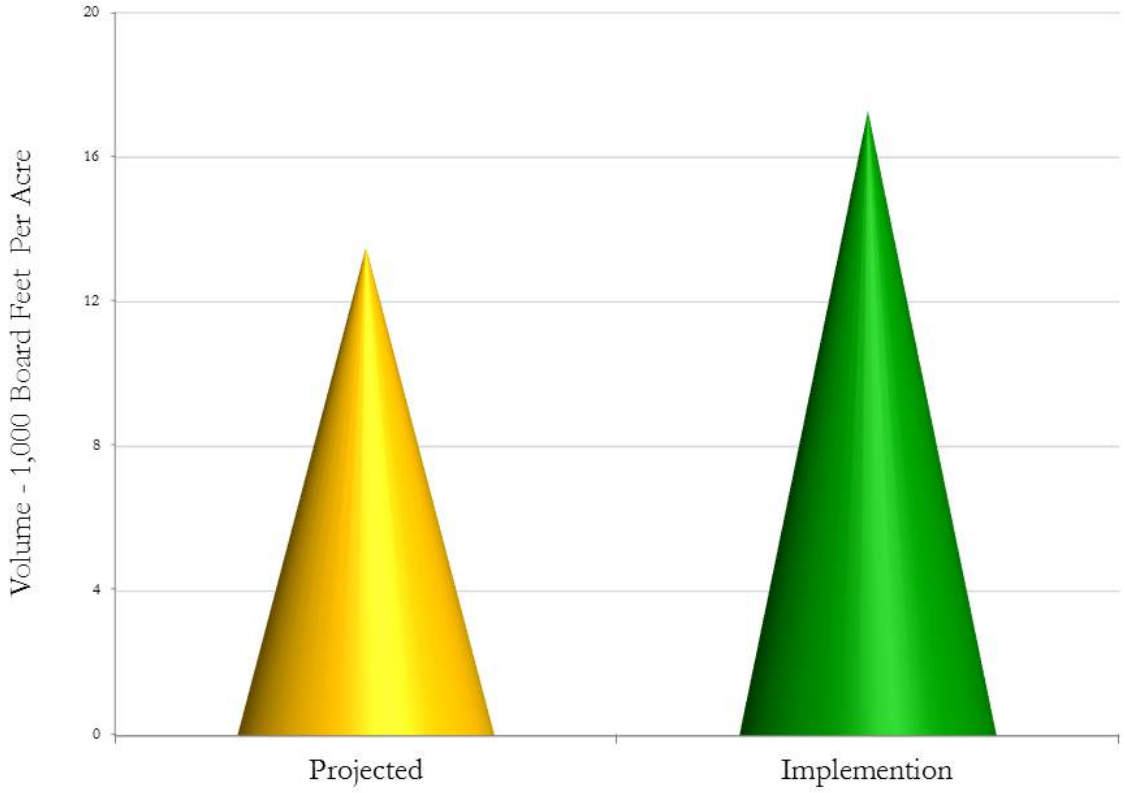
Right bars - Implementation of timber sales sold for FY 1995-2010.



- Fiscal Years 1995 – 2010
  - Regeneration sale acreage was 40% of the RMP projected level.
  - Regeneration sale acreage of stands 150 years and older were 2% of the RMP projected level (not displayed in the graphic).
  - Thinning sale acreage was 124% of the RMP projected level.
  - Total sale acreage was 89% of the RMP projected level.

5) ASQ Thinning Volume Per Acre – Projected and Implementation

Figure 10 – Projected Volume Per Acre and Implementation Fiscal Years 1995 - 2010.



- Fiscal Years 1995 – 2010
    - The determination of the ASQ assumed an average of approximately 13.5 thousand board feet would be harvested per acre with thinning harvest.
    - Over the life of the plan thinning sales have averaged slightly over than 17 thousand board feet per acre.
    - The ASQ thinning volume per acre was 128% of the RMP projected level.

6) Changed Circumstances and New Information

- In 1998, the ASQ was reduced by 3 million board feet to account for deferrals to meet management action/direction for retention of late-successional forest[5] and reductions in the harvest land base for the creation of additional late-successional reserves for Marbled Murrelet sites identified after 1995.

- In 2008, the U.S. Fish and Wildlife Service designated new critical habitat for the northern spotted owl. This designation precludes sustained-yield timber management and has reduced the land available for harvest by approximately 22% from what was assumed by the 1995 RMP determination of the ASQ.

- The BLM has generally avoided timber sales within the home ranges of known or predicted spotted owl sites to minimize effects on spotted owls and owl habitat. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Management of Survey and Manage sites in the harvest land base was not considered in the determination of the ASQ. As sales are designed and sites are identified, acres are reserved from harvest units. The BLM has also been avoiding timber harvest on lands in the harvest land base which are likely to have occurrences of survey and manage species, because of the necessary investment in surveys and resulting effects of species occurrence on sale viability. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Marbled murrelet sites continue to be identified in the harvest land base, which results in re-designation of harvest land base acres to Late-Successional Reserves. The BLM has also been avoiding timber harvest on lands in the harvest land base which are likely to have occurrences of murrelet sites, because of the necessary investment in surveys and resulting effects of species occurrence on sale viability. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Anticipation of protests and appeals has caused the BLM to avoid regeneration harvest, especially regeneration harvest of older forest. This has implications for the sustainability of timber harvest, and has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- The 2008 FEIS evaluated the volume potential utilizing current inventory and improved mapped data on allocations. The 2008 FEIS analysis of continued implementation of the 1995 RMP (i.e., the No Action alternative in the 2008 FEIS) indicated the sustainable harvest level for the Eugene District would be 58 million board feet. The 2008 FEIS analysis of continued implementation of the 1995 RMP indicated that there would be a potential non-ASQ harvest of 14 million board feet volume from reserves for the next 20 years.

[5] 15% Standard and Guide, retention of 25% late-successional forest in Connectivity/Diversity Blocks

Appendix 5

Coos Bay District Supporting Data

Table of Contents

Coos Bay District– RMP Evaluation Spreadsheet

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Land Use Allocations	*				At present, the Management Direction is adequate to meet resource needs. If the proposal to transfer the 60,000 acres of Coos Bay Wagon Roads to the Coquille Indian Tribe occurs, an amendment will be needed.
Watershed Analysis	*				The District currently conducts NEPA on the watershed or sub-watershed level for timber sales or programmatic restoration activities. This NEPA document contains a current assessment of the watershed condition / baseline. In addition, "new science" is in rapid flux and by the time a watershed analysis could be revised, even that information could be 'stale'. The value of redoing old watershed analysis is questionable due to the current NEPA process and the considerable costs in human resources and time.
Timber Management			*		Approximately 25-30% of the Matrix LUA is occupied murrelet habitat and these acres have been removed from that timber harvest base as unmapped LSR. Another 25% of District Matrix lands are unsurveyed suitable habitat. The ASQ needs to be recalculated to account for this reduction in the Coos Bay District timber harvest base. Management Direction need to be reassessed as a result of the District conducting exclusively thinning forest prescriptions vs. regeneration harvest. Some measures related to regen harvest may need to be removed (snag retention at 40% level) and others may need to be modified (down wood). In addition, road density targets are not obtainable due to land ownership patterns.
Silviculture					
Special Forest Products, Biomass	*				Management Direction is adequate to meet current resource needs for the Special Forest Products program. Biomass was anticipated, but we have not seen much in developed activities/proposals for this program.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Soils	*				Management Direction is adequate to meet current resource needs. However, the anticipated environmental effects are less than anticipated under the 1994 EIS which is a reflection of alterations in the timber program (i.e. very little broadcast burning associated with regen harvest has occurred).
Hydrology	*				Management Direction is adequate to meet resource needs. However, plan maintenance is needed to incorporate new BMPs developed during the WOPR process and clarify confusing language with some of the current BMPs.
Wildlife Habitat	*				See next section. Management direction in regards to retention requirements of snags and down wood could be refined to reflect new information on snags/down wood.
Wildlife including Special Status Species	*				Management Direction is adequate to meet resource needs.
Botany including Special Status Species	*				Management Direction is adequate to meet resource needs. Non-vascular pre-disturbance plant surveys for special status species and Survey and Manage species, especially fungi, may have effects on other resources-particularly the timber sale program. In the Environmental Effects section (4-66) it states erroneously that special status bryophytes, fungi and lichen species only occur along the coast and that no impacts are anticipated; however, current policies and practices are sufficient to protect species viability.
Fisheries including Special Status Species	*				Management Direction is adequate to meet restoration needs. Compliance with Aquatic Conservation Strategy is difficult at the site-scale for some Objectives and impossible to meet on others. Examples: management of Dean Creek Elk Viewing Area and maintenance of existing 'man-made' fire ponds is incompatible with the management direction for Riparian Reserves & ACS.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Rural Interface		*			The Management Direction for Rural Interface Areas does not comply with the current direction for management of Wildland Interface Areas, a plan Amendment to address this is needed. The RMP analyzed RUI at 2,100 acres and the WUI acreage is 191, 000 acres. The overlay of WUI on top of LUA management directions can be in conflict. For example - wildland interface treatments like fuels reduction can conflict with management direction for LSRs/RRs.
Lands and Realty, Special Use Permits, Utility Corridors, Communication Sites			*		Management Direction needs to be modified to reflect changes National policy direction on land tenure adjustments. Land exchanges and land disposals are increasingly difficult or impossible to implement because of language in the current RMP. The RMP does not support some recently mandated land tenure activities. Maintenance at some facilities (e.g. comm sites) is difficult to accomplish because the sites were not administratively withdrawn from the NWFP management directions like the SSS program. New RMP direction is needed in an amendment.
Access, Rights-of-way		*			Approval of large linear (power lines, pipelines) Rights-of-Way applications is incompatible with the Management Direction in the RMP. The Linear ROWs cannot avoid "reserve" or "protected" areas on the landscape. Removal of occupied marbled murrelet habitat, which is exceedingly difficult to avoid, requires a plan Amendment. In addition, current language for LSRs, Survey & Manage, and ACS Objectives is not compatible for such projects.
Roads		*			Management Direction is adequate to meet resource needs, however, the lack of funding for road maintenance negatively affects the ability to manage roads "to meet the needs identified under other resource programs." The plan assumed a level of maintenance and assessed effects to resources (like water quality) - we are outside of the baseline used for the effects analysis in the 1995 RMP.
Recreation	*				Management Direction is adequate to meet current resource needs.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Off-highway Vehicle Use	*				Management Direction is adequate to meet current resource needs. The District needs to complete a Comprehensive Travel and Transportation Management Plan to comply with policy directives.
Visual Resource Management	*				Management direction is adequate to meet current resource needs, however, new policy in IM No. 2009-167 requires that field offices have current Visual Resource Inventories in place to provide baseline for VRM NEPA analysis. The VRM inventory in Coos Bay District dates from the late 1980's. VRM management classes in some visually sensitive areas (e.g. North Spit, Bastendorff and Dean Creek are currently VRM Class IV) may need to be reevaluated in the next RMP revision to determine if the current level of VRM protection is warranted. Other areas within the timber management base may not warrant the VRM Class III designation they currently have under the RMP.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
NLCS, Wilderness, and Wild and Scenic Rivers	*				Management direction is adequate to meet current resource needs, however, the next RMP Revision process should reassess the four WSR segments in the District and incorporate new Policy pertaining to Wilderness Characteristics. **Wild and Scenic River Eligibility** - four river segments in the Coos Bay District (Sixes, South Fork Coos, South Fork Coquille, Umpqua) were found eligible for designation as part of the Wild and Scenic River System in the 1995 RMP but these may need to be reassessed given the miniscule amount of BLM lands within the corridors. Regulation and policy requires that the outstandingly remarkable values (ORVs) within 1/4 mile of these rivers need to be retained until a suitability analysis is completed that either finds the river segments suitable or releases them from further consideration. Projects analyzed under NEPA within these eligible corridors needs to consider the effects of the proposed action on the ORVs within the corridor. **Wilderness Characteristics** - 21 areas in the district were identified by the public during scoping for the WOPR as having wilderness characteristics. The areas were inventoried and one area, Wasson Creek, was found to have wilderness characteristics. Secretarial Order 3310 and wilderness inventory and planning manuals call for maintaining current wilderness inventories, considering lands with wilderness characteristics (LWCs) in project analysis and land use plans and protection of LWCs in land use plans (via designation as Wild Lands) and project analysis unless there are appropriate, documented reasons for not protecting. **Wilderness Study Areas/Instant Study Areas -** the Cherry Creek RNA is an Instant Study Area under the RMP and thereby is managed under the non-impairment standards in the Interim Management Policy for Areas Under Wilderness Review. The area is designated as VRM Class I as required under BLMs most recent policy for VRM management in WSAs.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Areas of Critical Environmental Concern	*				Management direction is adequate to meet current resource needs. **Potential ACECs** - Under the analysis conducted for the WOPR, five potential ACECs were identified as having sufficient importance and relevance values for management and protection as ACECs. These areas are Roman Nose, Brownson Ridge, Euphoria Ridge, Rocky Peak and Steel Creek. However, Interim measures are sufficient to protect R&I of these areas until the next RMP revision process.
Significant Caves & other NLCS Values	*				
Invasive Species/ Noxious Weeds		*			There is no Management Direction for Invasives. Sudden Oak Death - The previous RMP evaluation recommended that a forest pathogen and eradication module be incorporated into the upcoming RMP revisions. The invasive pathogen that is causing Sudden Oak Death continues to infect forested stands in the south portion of the district and is spreading northward. WOPR allowed for treatments in the TMA and RMA, but not all stands; there was no "module" specific for SOD.
Archeology, Paleontology, Cultural & Historic Resources, including Native American Values	*				Management direction is adequate to meet current resource needs. A new National Protocol agreement is being finalized at the WO, and the Oregon Protocol is currently being negotiated between the SO and Oregon SHPO.
Renewable Energy and Adverse Energy Impact Assessments	*				The RMP did not directly anticipate potential solar and wind energy development, but current interests are still minimal. Plan amendments would be needed if proposals come forward.
Rangeland Resources, Livestock Grazing and Wild Horse &	*				Management direction is adequate to meet current resource needs. Very little livestock grazing (26 AUMs) , no WH&B

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Burro Management					
Minerals and Energy			*		Management direction is adequate to meet current needs, but inadequate to address future needs. The 1995 RMP did not foresee the development of Coal Bed Methane Gas (CBMG) in the Coos Bay basin. The RFD (Expected Reasonably Foreseeable Development) forecasted only 4 drill pads and limited development (86 acres of disturbance, including roads and pipeline construction). In addition, the RMP special stipulations for leasables are largely NSO (No Surface Occupancy) that are not supported by documentation in the RMP or 1994 FEIS. With the discovery of Coal Bed Natural Gas (CBNG) in the Coos Basin, a more realistic RFD would be well development of 37-77 wells and a related disturbance of encompassing between 291.5 and 525.75 cares. Issuing of leases for CBNG would require an RMP Amendment.
Hazardous Mat.	*				
Socioeconomic					State Office
Payments					
Contracting					
Management Actions					

Coos Bay District ACECs

District	Name	Acres	Status	Year Designated	Relevant and Important Values
Coos Bay	Brownson Ridge	399	Potential	2008	Wildlife, Natural System
Coos Bay	Cherry Creek RNA	592	Existing	1995	Natural Systems, Botanical, Wildlife, Fish
Coos Bay	China Wall	302	Existing	1995	Natural Systems, Botanical, Wildlife, Cultural
Coos Bay	Euphoria Ridge	241	Potential	2008	Natural System
Coos Bay	Hunter Creek Bog	721	Existing	1996	Natural Systems, Botanical
Coos Bay	New River	1133	Existing	1987	Natural Systems, Botanical, Wildlife, Fish, Cultural
Coos Bay	North Fork Chetco River	603	Existing	1995	Natural Systems, Botanical, Wildlife, Cultural
Coos Bay	North Fork Coquille River	311	Existing	1995	Natural Systems, Botanical, Wildlife, Fish
Coos Bay	North Fork Hunter Creek	1757	Existing	1996	Natural Systems, Botanical, Wildlife, Fish, Cultural
Coos Bay	North Spit	682	Existing	1995	Scenic, Historic, Botanical Wildlife, Cultural
Coos Bay	Rocky Peak	1827	Potential	2008	Historic, Scenic, Wildlife, Natural Systems, Botanical
Coos Bay	Roman Nose	205	Potential	2008	Scenic, Natural System
Coos Bay	Steel Creek	1381	Potential	2008	Historic, Fish, Natural System

District	Name	Acres	Status	Year Designated	Relevant and Important Values
Coos Bay	Tioga Creek	42	Existing	1995	Natural Systems, Wildlife, Fish
Coos Bay	Upper Rock Creek	472	Existing	1995	Natural Systems, Botanical
Coos Bay	Wasson Creek	3394	Existing	1995	Natural Systems, Botanical, Wildlife, Fish

*Potential ACEC's were proposed under 2008 RMP, and are being managed under 'Interim management' following ACEC policy until RMP legal issues are resolved. "Existing, proposed to drop", are ACEC's that no longer meet the Relevance and Importance criteria, would preclude sustained yield timber production on O&C lands, or don't need special management attention under the 2008 RMP. These too are under interim management.

Coos Bay District – 2010 Resource Management Plan Evaluation
Allowable Sale Quantity Findings

1) Timber sales associated with the lands allocated to sustained yield timber production have departed substantially from the assumptions used in the RMP determination of the Allowable Sale Quantity (ASQ).

    - **ASQ Not Achieved** -During the evaluation period, sale volume was 53% of the declared ASQ.

    - **Regeneration Harvest - Below Assumed Level** -The RMP determination of the ASQ assumed 85% of the volume would come from regeneration harvest sales. During the evaluation period, regeneration volume was less than 4% of the RMP assumed level.

    - **Thinning Harvest - Exceeded Assumed Level** - The RMP determination of the ASQ assumed 15% of the volume would come from thinning sales. During the evaluation period, thinning volume was 316% of the RMP assumed level.

    - **Thinning Volume/Acre - Exceeded Assumed Level** - Thinning sale volume per acre was 185% of the RMP assumed level.

2) The current approach to a forest management regime that deviates so considerably from the RMP assumptions used in determination of the ASQ is not sustainable at the declared ASQ level.

    - The RMP determination of the ASQ is based upon an assumed cycle of regeneration and thinning harvest. Sustainability of the declared ASQ relies on the implementation of the assumed harvest.

    - The reduced level of regeneration sales and the acceleration of thinning has been a trend since 1999.

    - The declared ASQ was based on regeneration harvest of mature forest as the primary source of volume. The ASQ cannot be sustained at the currently declared level if regeneration harvest is not implemented.

    - Regeneration harvest conducted today provides the stands available for thinning 30 year from now. The implementation trend of lower level of regeneration harvest reduces future thinning opportunities.

    - Accelerated rates of thinning without replenishment of younger forest stands through regeneration harvest means that opportunities for thinning will eventually be exhausted.

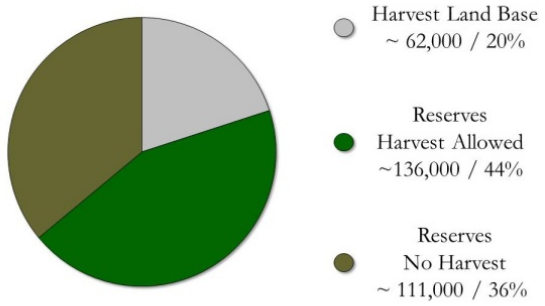
- Increased intensity of thinning has long term effects on future thinning and regeneration harvest yields.

Coos Bay District – 2010 Resource Management Plan Evaluation

Timber Resources – Supporting Data

Resource Management Plan Allocations Related to Timber Harvest[1]. Figure 1

The District's 309,000 [2] acres, as related to timber harvest, are described in three categories:



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Reserves Harvest Allowed – Harvest is allowed, for reserve land objectives, within Late-Successional and Riparian Reserves. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the reserve allocations. Timber sale volume from reserves does not contribute to the ASQ, because it is not a sustainable source of volume for the long term.

Reserves No Harvest – This category includes: Late-Successional and Riparian Reserves stands over age 80, recreation sites, lands not suitable for timber production, Areas of Critical Environmental Concern, and other allocations under the RMP in which timber harvest is generally not permitted.

Allowable Sale Quantity – ASQ Declaration

The O&C Act requires that the annual productive capacity be determined and declared. The ASQ is based on the capacity of the lands, allocated to sustained yield objectives, to produce timber at a level that will remain constant over time. The General Forest Management Area and Connectivity Diversity Blocks (harvest land base) are the lands allocated for this purpose. In conjunction, the assumptions for the cycle, intensity, and harvest methods determine the sustainable harvest level from these lands. In simplistic terms, the sustained yield reflects a harvest rate that is in balance with forest growth on the harvest land base.

The Coos Bay District Record of Decision declared the allowable sale quantity of 32 million board feet in May 1995. The evaluation of the RMP in 1998 reduced the ASQ to 27 million board feet to account for reductions to the harvest land base acreage by the legislated transfer of lands to the Coquille Indian Tribe and the creation of additional late-successional reserves for Marbled Murrelet sites identified after 1995.

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[1] Harvest Land Base data - 1995 ROD Table 1, Reserves categories estimated based on third-year evaluation age class data.
[2] 1995 ROD Table 1.

Acronyms / Terminology

- ASQ - Allowable Sale Quantity.
- LSR - Late-Successional Reserves.
- Regeneration – Volume and acres associated with regeneration harvest.
- Thinning – Volume and acres associated with the range of harvest types, including commercial thinning, and density management.
- Evaluation Period – Fiscal years 2004 through 2010. Data is provided for the 16 years since the beginning of the RMP in some cases to provide context.
- Volume – Eastside Scribner 16 foot short log measure.

Evaluation Standard

RMP Assumptions / Projections - The underlying assumptions from the RMP determination of the ASQ are used as the standard to measure plan conformance. These assumptions include the levels of regeneration and thinning harvest volume and the associated treated acres. The term "projections" equates to the RMP assumptions over a period of time such as the evaluation period or the life of the plan.

Sold Timber Sales - The volume and acres associated with sold timber sales are used as the evaluation standard for implementation. Not all sold sales were implemented at the time of the evaluation. As of the end of fiscal year 2010, two previously sold timber sales, representing approximately 7 million board feet, were returned to the government by mutual contract cancelation[3].

Disclaimer

The data in this report was compiled from a variety of sources spanning over 16 years. There may be minor inconsistencies with previously reported information. The purpose of the data in this report is to portray the implementation of the timber sale program in relation with the assumptions of the Resource Management Plans. The display of the data is intended to show the general magnitude for comparison purposes.

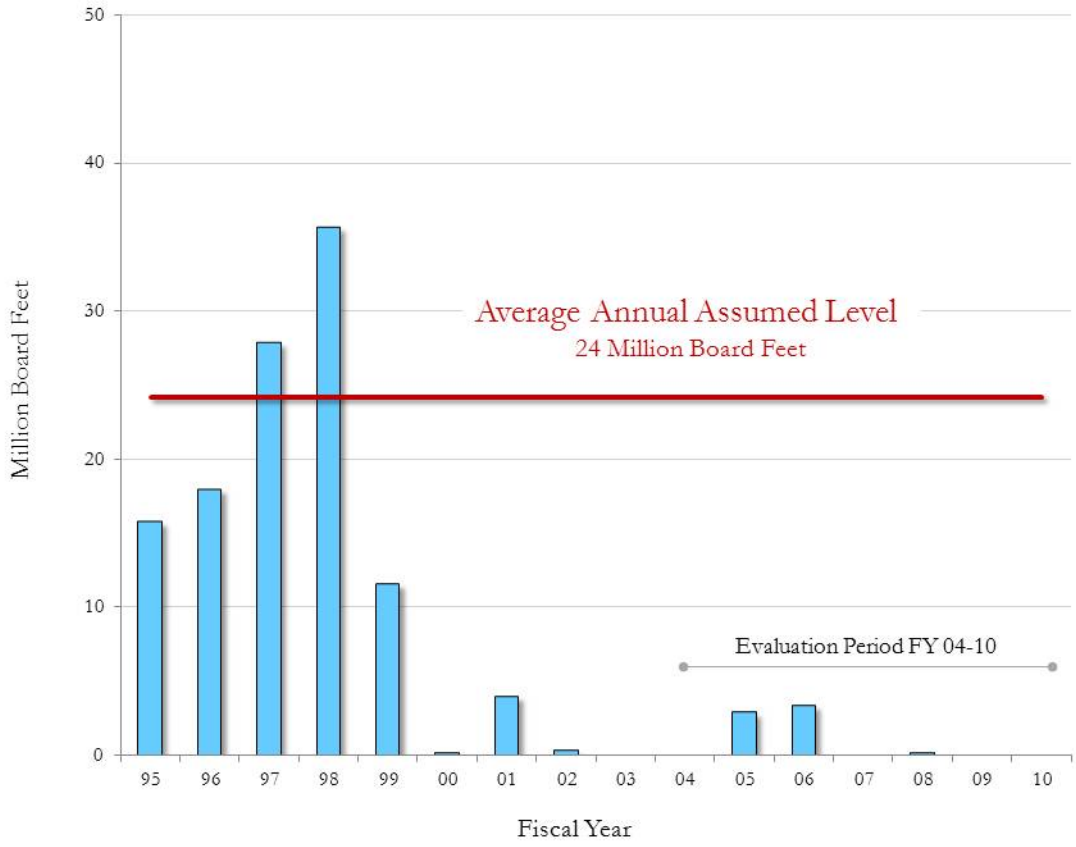
[3] Washington Office Instruction Memorandum No. 2010-003

Evaluation of Timber Resources

1) ASQ - Regeneration / Thinning Volume and RMP Assumptions

Figure 2 – ASQ Regeneration Volume by Fiscal Year

RMP assumed average annual volume level[4] (red) compared with sold volume (blue).

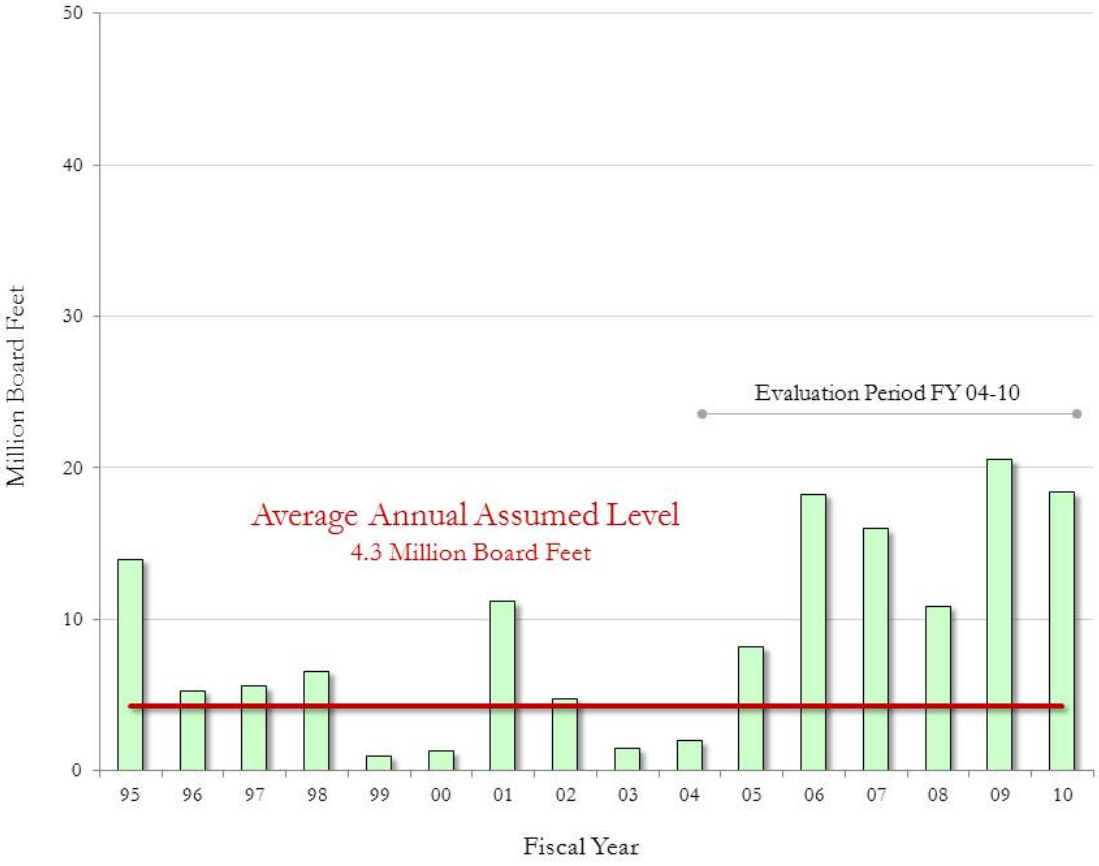


- Regeneration volume, with the anticipated plan ramp-up period, was consistent with the RMP assumed levels in the early years of the plan.
- Regeneration volume has not achieved the RMP assumed level since 1998.
- Evaluation Period
  - Regeneration volume averaged slightly less than 1 million board feet per year.
  - Regeneration volume was less than 4% of the RMP assumed level.

[4] Average of regeneration levels associated with 1995-1998 ASQ (33MMBF), 1999-2010 (27MMBF)

Figure 3 – ASQ Thinning Volume by Fiscal Year

RMP assumed average annual volume level[5] (red) compared with sold sale volume (green).

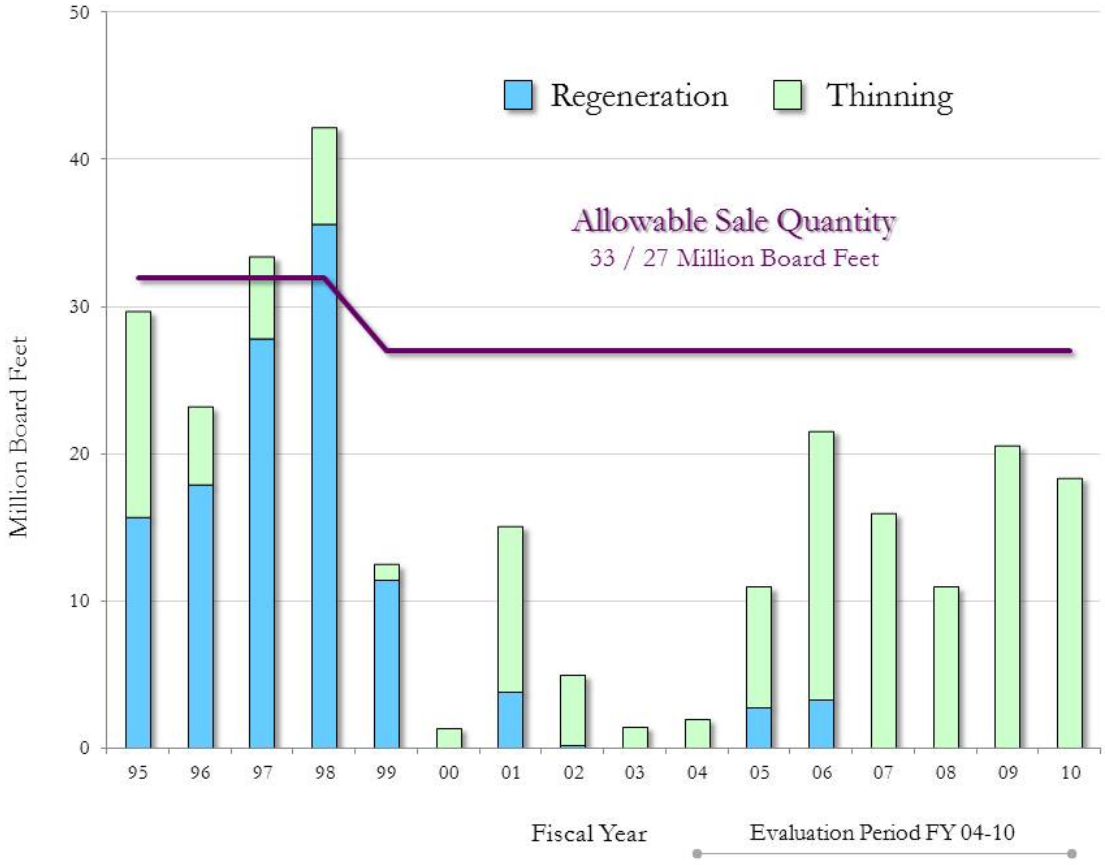


- Since 1995, thinning volume, on average, were 213% of the RMP assumed level.
- Evaluation Period
  - Thinning volume averaged 13.5 million board feet per year.
  - Thinning volume was 310% of the RMP assumed level.

[5] Average of thinning levels associated with 1995-1998 ASQ (36MMBF), 1999-2010 (33MMBF)

Figure 4 – Total ASQ Volume by Fiscal Year

RMP declared Allowable Sale Quantity (purple) as compared with sale volume of regeneration (blue) and thinning (green) by fiscal year.

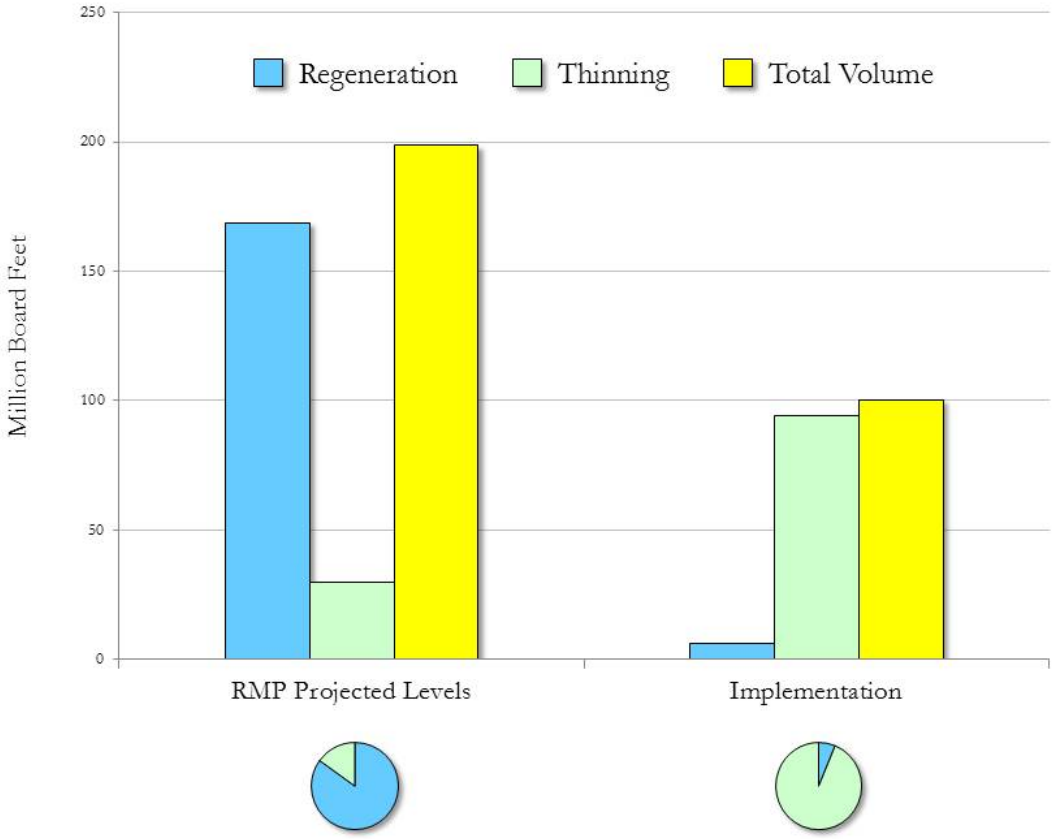


- The ASQ was achieved during the early years of the RMP with the anticipated ramp-up period.
- The ASQ has not been achieved since 1998.
- Evaluation period
    - Sold volume average slightly over 14 million board feet annually.
    - Sold volume was 56% of the ASQ.

Figure 5 – Total ASQ Volume – Evaluation Period - Projected and Implementation.

Left bars and pie - RMP projected assumed levels for the evaluation period.

Right bars and pie - Implementation - timber sales sold during the evaluation period.



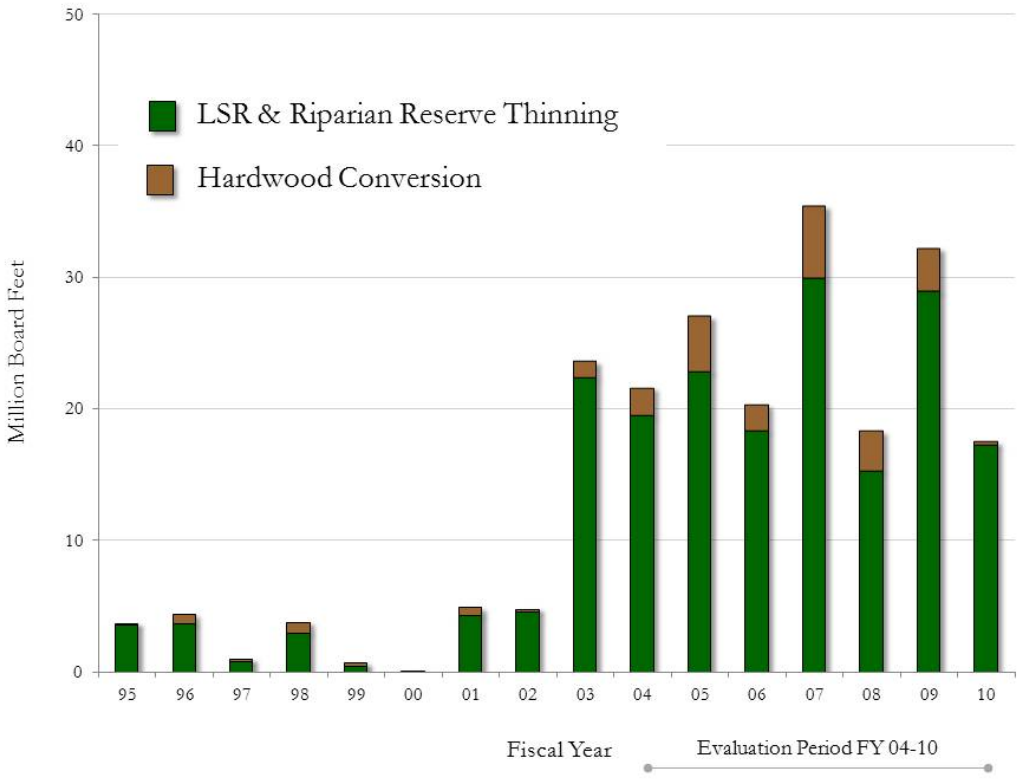
- Evaluation Period
  - Total sold volume was 53% of the RMP projected level.
  - Regeneration volume was less than 4% of the RMP projected level.
  - Thinning sales were 316% of the RMP projected level.
  - The RMP assumed 85% of the ASQ would be from regeneration and 15% from thinning sales (left pie).
  - Sold sales were 6% regeneration and 94% thinning (right pie).

2) Non-ASQ - Reserve and Hardwood Conversion Volume

Harvest is allowed, for reserve land objectives, within Late-Successional and Riparian Reserves. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the reserve allocations. Harvest from reserves does not contribute to the ASQ because it is not planned to be repeated over the long term and thus is not a sustainable source of volume.

Hardwood Conversion – hardwood stands, which are capable of growing conifers, are being converted to conifer stands in the Coos Bay District. Harvest of these hardwood stands occurs across allocations. Hardwood conversion was not included in the ASQ determination and is counted as non-ASQ volume in the evaluation.

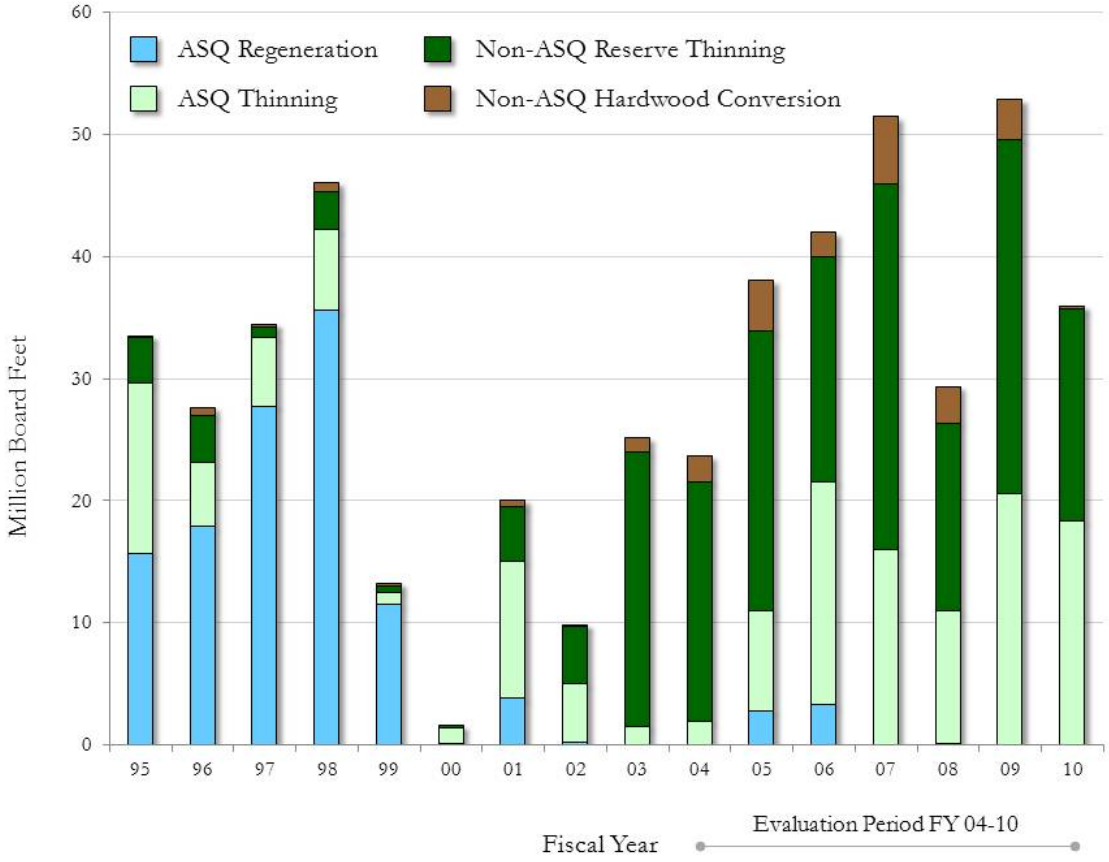
Figure 6 – Reserve and Hardwood Conversion Volume by Fiscal Year



- Evaluation Period
  - Non-ASQ volume averaged approximately 25 million board feet annually, 273 million board feet total.
  - LSR and riparian reserves averaged approximately 22 million board feet annually, 153 million board feet total.
  - Hardwood conversion averaged approximately 3 million board feet annually, 20 million board feet total.

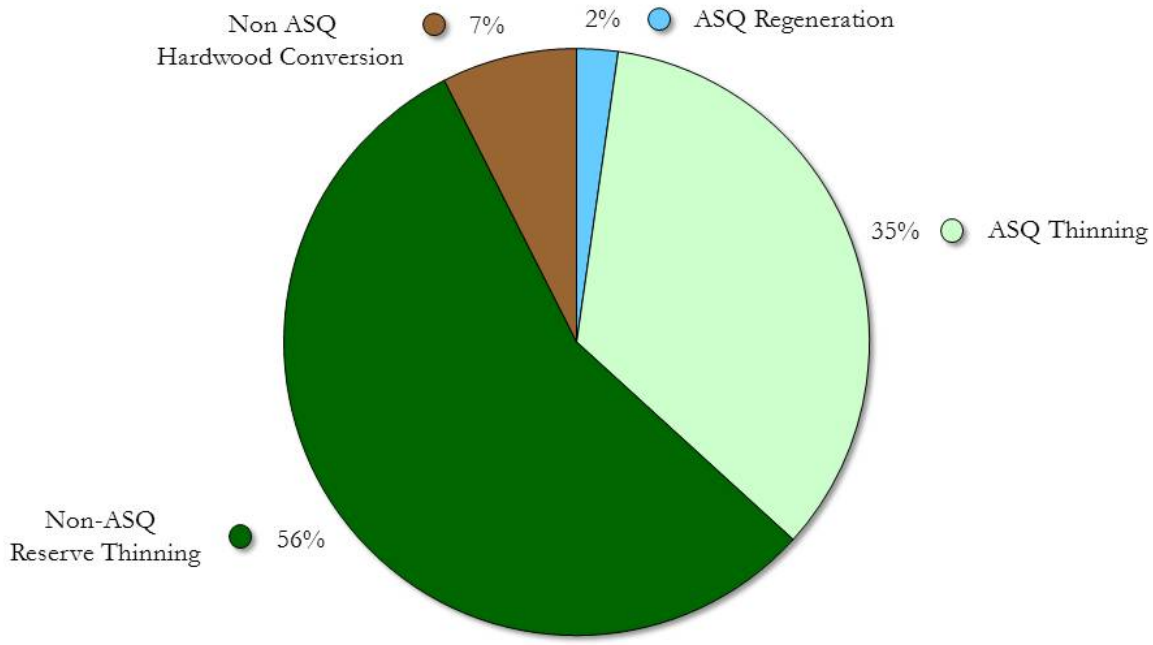
3) Total Volume - ASQ and Non ASQ

Figure 7 – Total Volume ASQ and Non ASQ by Fiscal Year



- Evaluation Period
    - Total volume sold averaged approximately 39 million board feet annually.
    - ASQ volume sold averaged slightly over 14 million board feet annually.
    - Non ASQ volume sold annually averaged approximately 25 million board feet.

Figure 8 – Total Volume ASQ and Non ASQ – Evaluation Period

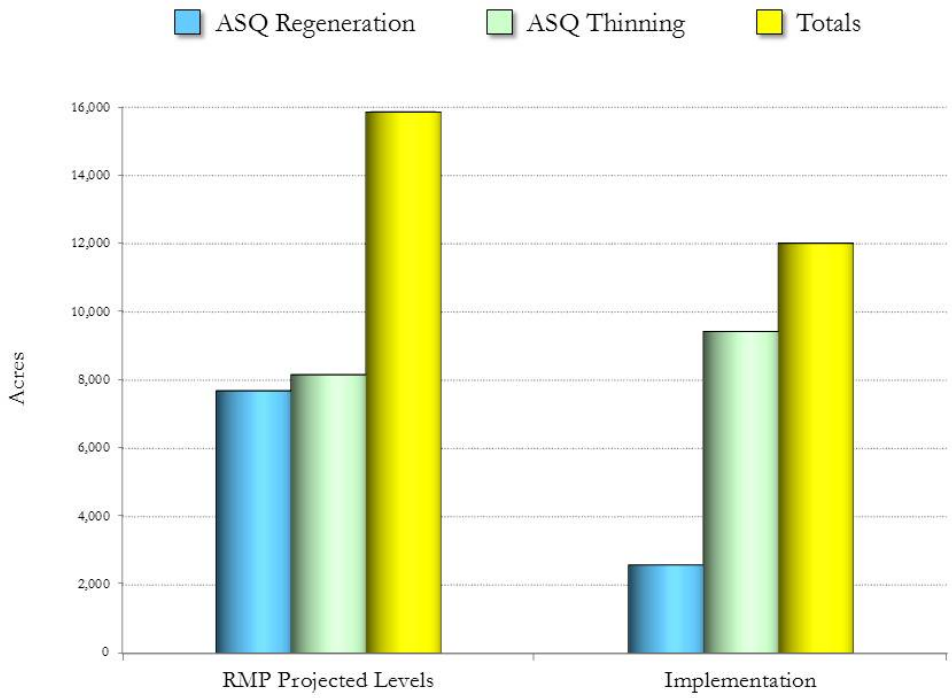


- Evaluation Period
    - ASQ and Non ASQ total volume was approximately 274 million board feet.
    - ASQ contributed 37% of the total volume sold, 101 million board feet.
    - Non-ASQ contributed 63% of the total volume sold, 173 million board feet..

4) ASQ Acres – Projected and Implementation

Figure 9 – Total Timber Sale Acres – Harvest Land Base - ASQ

Left bars - RMP projected assumed levels for FY1995-2010.



Right bars - Implementation of timber sales sold for FY 1995-2010.[6]

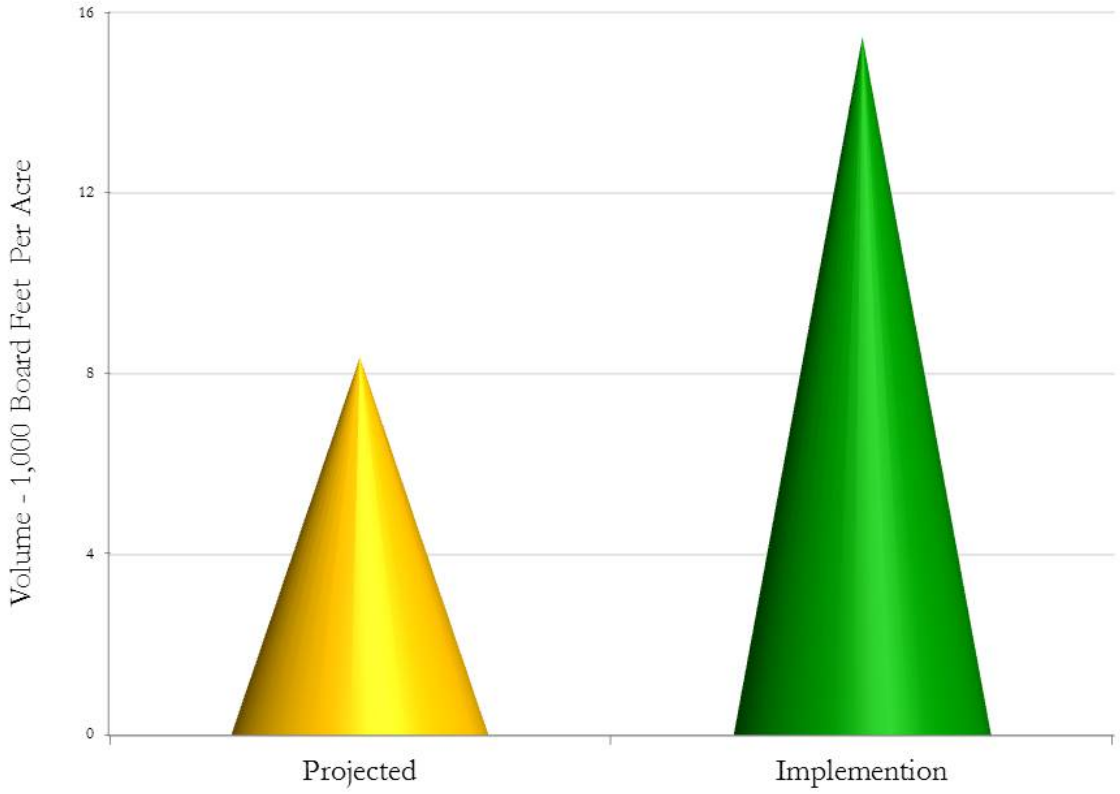
5) Fiscal Years 1995 - 2010

- Regeneration sale acreage was 34% of the RMP projected level.
- Regeneration sale acreage of stands 150 years and older has been 26% of the RMP assumed level (not displayed in the graphic).
- Thinning sale acreage was 115% of the RMP projected level.
- Total sale acreage was 76% of the RMP projected level.

[6] Implementation regeneration includes acres of hardwood conversion.

5) ASQ Thinning Volume Per Acre – Projected and Implementation

Figure 10 – Projected Volume Per Acre and Implementation Fiscal Years 1995 - 2010.



- Fiscal Years 1995 – 2010
    - The determination of the ASQ assumed an average of approximately 8.4 thousand board feet would be harvested per acre with thinning harvest.
    - Over the life of the plan thinning sales have averaged approximately 15.5 thousand board feet per acre.
    - The ASQ thinning volume per acre was 185% of the RMP projected level.

6) Changed Circumstances and New Information

- In 1998, the ASQ was reduced by 5 million board feet as the result in the legislated transfer of lands to the Coquille Indian Tribe and re-designation of additional acres to Late-Successional Reserves for marbled murrelet.

- In 2008, the U.S. Fish and Wildlife Service designated new critical habitat for the northern spotted owl. This designation precludes sustained-yield timber management and has reduced the land available for harvest by approximately 4% from what was assumed by the 1995 RMP determination of the ASQ.

- The BLM has generally avoided timber sales within the home ranges of known or predicted spotted owl sites to minimize effects on spotted owls and owl habitat. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Management of Survey and Manage sites in the harvest land base was not considered in the determination of the ASQ. As sales are designed and sites are identified acres are reserved from harvest units. The BLM has also been avoiding timber harvest on lands in the harvest land base which are likely to have occurrences of survey and manage species, because of the necessary investment in surveys and resulting effects of species occurrence on sale viability. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Marbled murrelet sites continue to be identified in the harvest land base, which results in re-designation of harvest land base acres to Late-Successional Reserves. *Approximately 25-30% of the Matrix LUA is occupied murrelet habitat and these acres have been removed from that timber harvest base as unmapped LSR. Another 25% of District Matrix lands are unsurveyed suitable habitat.*[7] The BLM has also been avoiding timber harvest on lands in the harvest land base which are likely to have occurrences of murrelet sites, because of the necessary investment in surveys and resulting effects of species occurrence on sale viability. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Anticipation of protests and appeals has caused the BLM to avoid regeneration harvest, especially regeneration harvest of older forest. This has implications for the sustainability of timber harvest, and has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- The 2008 FEIS evaluated the volume potential utilizing current inventory and improved mapped data on allocations, particularly lands in Riparian Reserves. The 2008 FEIS analysis of continued implementation of the 1995 RMP (i.e., the No Action alternative in the 2008 FEIS) indicated the sustainable harvest level for the Coos Bay District would be 48 million board feet. This increase

[7] Coos Bay submittal – Anne Boeder Email 3/25/2011

in sustainable harvest level would result, in part, because improved hydrologic mapping indicate that there would be fewer acres in Riparian Reserves than originally estimated in the 1995 RMP. Updated forest inventory reflected an increase in total volume since the early 1990's. The 2008 FEIS analysis of continued implementation of the 1995 RMP indicated that there would be a potential non-ASQ harvest of 26 million board feet volume from reserves for the first decade, which would be reduced to 9 million board feet in subsequent decades.

Appendix 6

Roseburg District Supporting Data

Table of Contents

Roseburg District- RMP Evaluation Spreadsheet

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Land Use Allocations	**No change in conclusions.** There have been no changes to the major land use allocations since the implementation of the ROD/RMP.				
*Matrix***			**No substantial change in conclusions.** The volume of matrix volume sold averages 42% of that assumed in the RMP.		** Several sub-categories of land use allocations were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
*Riparian Reserve***	**No change in overall conclusion.** The width of Riparian Reserves and activities that were monitored met ROD/RMP direction.				** Several sub-categories of land use allocations were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
*Connectivity/ Diversity Block***	**No change in conclusions.** The requirement to maintain 25-30% of each CD Block in a late-successional forest continues to be met. The need for the C/D Block allocation should be re-assessed during the next RMP revision.				** Several sub-categories of land use allocations were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
*Late-Successional Reserves***	**No change in conclusions.** Activities conducted in the LSR were consistent with ROD/RMP requirements with no instances of discrepancies.				** Several sub-categories of land use allocations were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
*Little River AMA***			**No change in conclusions.** The District is still operating under the 1997 Draft Little River AMA plan and no projects have been implemented within the AMA that could not have been implemented elsewhere.		** Several sub-categories of land use allocations were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
Watershed Analysis	**No change in conclusion.** The role of watershed analyses should be reviewed during the next RMP revision.				
Timber Management			Between 2004-2010, the District offered an average timber volume of 32 MMBF (71% of the 45 MMBF assumed in the ROD/RMP).		Timber Management was evaluated more in depth by a separate team. See pages 21-40 of this appendix.
Silviculture			**No change in conclusion.** The Roseburg District silviculture program has not been implemented as assumed in the RMP.		
*Brush Field Conversion***			**No change in conclusion.** To date brush field conversion has not occurred.		** Several sub-categories of silviculture were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Site Preparation (Fire)***			**No substantial change in conclusions**. Amount of site preparation with fire is 27% of planned levels and linked to failure to implement planned regeneration harvest levels.		** Several sub-categories of silviculture were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
*Site Preparation (Other)***			**No substantial change in conclusions.** Amount of site preparation with other methods is 4% of planned levels and linked to failure to implement planned regeneration harvest levels..		** Several sub-categories of silviculture were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Planting (Regular Stock)***			**No substantial change in conclusions.** Amount of planting with regular stock is 42% of planned levels and linked to failure to implement planned regeneration harvest levels.		** Several sub-categories of silviculture were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Planting (Improved Stock)***			**No substantial change in conclusions.** Amount of planting with improved stock is 4% of planned levels and linked to failure to implement planned regeneration harvest levels.		** Several sub-categories of silviculture were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Maintenance/Protection **			**No substantial change in conclusions.** Amount of maintenance/protection treatments is 143% of planned levels.		** Several sub-categories of silviculture were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Precommercial Thinning***	**No substantial change in conclusions.** Amount of PCT treatments is 99% of planned levels.				** Several sub-categories of silviculture were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Pruning***			**No substantial change in conclusions.** Amount of pruning treatments is 145% of planned levels.		** Several sub-categories of silviculture were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
*Fertilization***			**No substantial change in conclusions.** Amount of fertilization is 33% of planned levels.		** Several sub-categories of silviculture were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Forest Genetics***			**No change in conclusions.** Consolidation and downsizing of the forest genetics program is underway, consistent with 2004 conclusions.		** Several sub-categories of silviculture were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Port-Orford-Cedar Mgmt.***			**No change in conclusions**. The Port-Orford-cedar FEIS and ROD were completed in 2004 and the District ROD/RMP was subsequently amended later in 2004 (FY2009 APS, pgs. 58-59). The Port-Orford-cedar FEIS and ROD represents implementation of efforts discussed in the 2004 evaluation but does not represent a change in conclusions for 2011.		** Several sub-categories of silviculture were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
Special Forest Products, Biomass	**No change in conclusions.** The sale of special forest products generally follow the guidelines contained in the Oregon/Washington Special Forest Products Procedure Handbook, H-5400-2.				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
*Firewood Cutting Areas***	**No change in conclusion.** Establishment of firewood cutting areas independent of timber sales has not been a consistent practice throughout the analysis period contrary to what was indicated in the 2004 conclusion. Logging residues from timber sales remain the only consistent source of firewood for public use. Although there have been differences over time as to how firewood cutting opportunities are provided to the public, this does not constitute a change in conclusion related to RMP direction.				** Several sub-categories of special forest products were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
*Biomass***	**No change in conclusion.** The amount of biomass that could be made available from BLM managed woodlands and forests is unknown.				** Several sub-categories of special forest products were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
Soils	**No substantial change in conclusion.** Some instances of varying BMP effectiveness were noted in the APS. These discrepancies have been addressed through adaptive management, and closer coordination between contract administration and soils staff.				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Hydrology	**No change in conclusion.** Management direction for hydrologic resources continues to be met and overall road mileage in key watersheds has been reduced.				
Wildlife Habitat	**No change in conclusions.** Management direction for wildlife habitats and wildlife special status species continues to be met although there are certain topic areas where improvements could be made (see discussions below).				
*Special Habitat***			**No change in conclusions.** The utility of the "special habitat" designation is still questionable since it is largely redundant with other ROD/RMP guidance. District staff recommend that: (a) the definition of which features should be considered as "special habitat" be better defined and (b) that ROD/RMP direction for protecting special habitat be more results-driven (e.g. preserve or enhance the feature) rather than prescriptive (e.g. 100-200 ft. buffer).		** Sub-categories of wildlife habitat were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Habitat Data***			**No change in conclusions.** There is still a need to update NSO and MAMU habitat layers.		** Sub-categories of wildlife habitat were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Wildlife including Special Status Species	see below**	see below**	see below**	see below**	** Sub-categories of wildlife were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011 (see below).
*Marbled Murrelet "Bulge"**			**No change in conclusions.** There are still corrections needed regarding the marbled murrelet "bulge" as depicted in the NWFP.		** Sub-categories of wildlife were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Marbled Murrelet "Gray" Habitat**				**CHANGE IN CONCLUSION.** Marbled murrelet non-LSOG "gray" habitat was defined through plan maintenance in 2004.	** Sub-categories of wildlife were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
Botany including Special Status Species	**No change in conclusions.** The Botany, Special Status Plants, Invasive Species and Noxious Weeds elements of the ROD/RMP are functioning well and do not require RMP amendment or acceleration of a RMP revision.				
Fisheries including Special Status Species	**No change in conclusions.** Management action/direction for fish has been followed with no instances of discrepancies.				
Air Quality and Fire and Fuels	see below**	see below**	see below**	see below**	** Sub-categories of air quality and Fire and fuels were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011 (see below).

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
*Air Quality***	**No change in conclusions.** Implementation of the ROD/RMP has had a substantially smaller effect on air quality than anticipated.				** Sub-categories of air quality and Fire and fuels were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Prescribed Burning***			**No change in conclusions.** Prescribed burning for site preparation is still less than 50% of planned levels (0% between 2004-2010). Prescribed burning for habitat objectives is still over 200% of planned levels (averaging 845% between 2004-2010). Overall, prescribed burning averages 57% of planned levels.		** Sub-categories of air quality and Fire and fuels were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
Rural Interface	**No change in conclusions.** ROD/RMP allocations, constraints, or mitigation measures are effective in achieving the desired outcomes for the rural interface or WUI.				
*"Quality of Life"***			**No change in conclusions.** It is recommended by District staff that the poor wording for "quality of life" be improved (e.g. for human safety and protection of property); possibly in conjunction with the CWPP update.		** Sub-categories of rural interface were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011. The "Quality of life" objective is presented in the Rural Interface Areas guidance from the 1995 ROD/RMP (pgs. 54-55, 204).

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Lands and Realty, Special use Permits, Utility Corridors, Communication Sites		**CHANGE IN CONCLUSIONS.** Elements of the RMP are functioning well in regards to lands and realty except in regards to utility corridors (see below).			
*Land Tenure Adjustments***	**No change in conclusion.** The Land Tenure Adjustment elements of the RMP are functioning well.				** Sub-categories of lands and realty were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Withdrawals and Classifications***				**CHANGE IN CONCLUSION.** Remarks in 2004 regarding additions to Table 8 were in error and additions are not needed.	** Sub-categories of lands and realty were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Utility Corridors, Communication Sites, and Special Use Permits***		**CHANGE IN CONCLUSION.** The Pacific Connector Gas Pipeline and Survey and Manage standards and Guideline have created conflicts in granting the right-of-way for this utility.			** Sub-categories of lands and realty were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
*Roads and Engineering***	**No change in conclusions.** Road related decisions continue to be correct or proper over time.				** Sub-categories of lands and realty were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
Roads, Access, Rights-of-Way		**CHANGE IN CONCLUSION**. The Transportation Management Plan has been updated (2002 and 2010) and Survey and Manage standards and guidelines have created conflicts in accomplishing Right-of-Way projects.			
Recreation	**No change in conclusions.** The recreation program is achieving desired objectives under the ROD/RMP.				
Off-highway Vehicle Use	**No change in conclusion.** A District wide CTTMP is planned to begin development in 2012 which would, among other things, change existing OHV from "limited to existing" to "limited to designated" roads and trails. The CTTMP reflects implementation of the 1995 ROD/RMP but does not reflect a change in conclusions from 2004.				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Visual Resource Management	**No change in conclusion.** The clarified management decisions for VRM continue to be correct or proper over time.				
NLCS (Wilderness, Wild and Scenic Rivers, National Monuments, etc.)	see below**	see below**	see below**	see below**	** Sub-categories of NLCS were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011 (see below).
*Wilderness***	**No change in conclusion.** The Roseburg District has no wilderness or wilderness study areas, including "instant" wilderness study areas but it does have a 116 acre area identified in the 2008 FEIS (WOPR, pgs. 423-424) as possessing wilderness characteristics for "naturalness" and "outstanding opportunities for solitude" that is contiguous with a U.S. Forest Service roadless area.				** Sub-categories of NLCS were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.
*Wild & Scenic Rivers***	**No change in conclusions.** However, District staff recommends that plan maintenance clarify that the guidance for "eligible/suitable" rivers applies to those rivers that are both eligible AND suitable.				** Sub-categories of NLCS were considered previously in the 2004 Plan Evaluation and were therefore also considered in 2011.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Areas of Critical Environmental Concern	**No change in conclusions.** However, there are three additional areas (i.e. Callahan Meadows, China Ditch, and Stouts Creek) to manage as proposed ACECs.				
Significant Caves	**No change in conclusion.** There are no designated significant caves on the Roseburg District.				
Botany				**CHANGE IN CONCLUSION.** Separate objectives for botanical species in general is not needed, but; District staff recommend that: (a) the definition of which features should be considered as special habitat be better defined and (b) that ROD/RMP direction for protecting special habitat be more results-driven (e.g. preserve or enhance the feature) rather than prescriptive (e.g. 100-200 ft. buffer).	

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Invasive Species/Noxious Weeds	**No change in conclusion.** The Botany, Special Status Plants, Invasive Species and Noxious Weeds elements of the ROD/RMP are functioning well but the ROD/RMP should be updated, through plan maintenance, to reflect new information regarding herbicide use (i.e. the 2007 and 2010 vegetation management FEISs). Although there is new information that would be more appropriate to cite in plan maintenance, this does not reflect a change in conclusions from 2004.				
*Noxious Weed Control Methods***	**No change in conclusion.** Limits on the amount of herbicide active ingredient that may be used annually that were set in the 2010 Vegetation Treatments Using Herbicides on BLM Lands in Oregon EIS differ from the limits set in the 1985 Northwest Area Noxious Weed Control Program EIS referenced in the ROD/RMP. District recommends plan maintenance to reflect new information. This does not reflect a change in conclusions from 2004.				** Sub-categories of invasive species/noxious weeds were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
*Reseeding***				**CHANGE IN CONCLUSION**. Additional management action/direction to specifically include reseeding is unnecessary since it is adequately provided for in existing ROD/RMP guidance.	** Sub-categories of invasive species/noxious weeds were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
Archeology, Paleontology, Cultural & Historic Resources, including Native American Values	**No change in conclusions.** The Archeology, Cultural and Historical Resources and Paleontological elements of the planning unit are functioning very well and do not require RMP amendments or acceleration of a RMP revision.				
Renewable Energy and Adverse Energy Impact Assessments	**No change in conclusions.** There are currently no energy related proposals before the District and none are expected in the foreseeable future.				
Rangeland Resources, Livestock Grazing and Wild Horse & Burro Management	**No change in conclusions.** The Roseburg District has no authorized livestock grazing or wild horse and burro herds/programs.				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Minerals and Energy			**No change in conclusions.** S&M standards and guidelines and mitigation measures for other resources (e.g. reserve system) hinder the District's ability to provide rock sources.		
*Unmet Needs for Saleable Minerals***			**No change in conclusions.** The extent of the unmet need for saleable minerals is still unknown.		** Sub-categories of minerals and energy topics were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
*Rock Pits/Quarries***			**No change in conclusions.** It is still recommended by District staff that existing rock pits and/or community pits have an administrative withdrawal that would encompass an area of foreseeable pit or quarry expansion to alleviate resource conflicts (e.g. with LSR guidance, Survey and Manage standards and guidelines). The opportunity for obtaining rock from existing pits without further development is still limited.		** Sub-categories of minerals and energy topics were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
*Abandoned Mine Lands***			**No change in conclusions.** It continues to be recommended by District staff that management direction be added to the ROD/RMP regarding abandoned mine lands in an effort to facilitate actions under the Comprehensive Environmental		** Sub-categories of minerals and energy topics were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
			Response, Compensation and Liability Act of 1980 (CERCLA).		
*New Technology***			**No change in conclusions.** There are still new technologies that were not considered in the ROD/RMP that may be less impacting.		** Sub-categories of minerals and energy topics were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
*National Energy Policy Conservation Act***			**No change in conclusions.** The National Energy Policy Act may still require review of RMPs.		** Sub-categories of minerals and energy topics were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
*Coal Bed Methane***	**No change in conclusions.** There are currently no energy related proposals before the District and none are expected in the foreseeable future.				** Sub-categories of minerals and energy topics were considered previously in the 2004 Plan Evaluation and were therefore also considered again in 2011.
Hazardous Materials	**No change in conclusion.** All hazardous materials incidents on public lands are handled in accordance with the ROD/RMP.				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Socioeconomic, Jobs in the Woods, etc.	**No change in conclusions.** The Roseburg District continues to contribute to the local economy and socioeconomic conditions through contracting and employing local community members.				
Payments	**No change in conclusion.** Payments were made to Douglas County throughout 2004-2010, although at reduced amounts beginning in 2008.				
Contracting	**No change in conclusions.** The District continues to contribute financially to the local community through contracting approximately $4,430,258 annually.				
Management Actions	**No change in conclusions.** The Roseburg District continues to contribute to the local economy and community through contracting, payments, and socioeconomics as described above.				

Roseburg District ACECs

District	Name	Acres	Status	Year Designated	Relevant and Important Values
Roseburg	Bear Gulch RNA	351	Existing	1995	Natural Systems, Botanical
Roseburg	Beatty Creek RNA	864	Existing	1995	Natural Systems, Botanical
Roseburg	Bushnell-Irwin Rocks RNA	1085	Existing	1995	Natural Systems, Botanical, Stream Order
Roseburg	Callahan Meadows	82	Potential	2008	Botanical
Roseburg	China Ditch	60	Potential	2008	Botanical
Roseburg	Myrtle Island RNA	19	Existing	1981	Natural Systems (Riparian)
Roseburg	North Bank	6162	Existing	1993	Cultural, Wildlife, Botanical
Roseburg	North Myrtle Creek RNA	453	Existing	1995	Natural Systems, Botanical
Roseburg	North Umpqua River	1791	Existing, Proposed to Drop	1995	Scenic, Fish
Roseburg	Red Pond RNA	141	Existing	1995	Wildlife, Natural Systems (Ponds), Botanical
Roseburg	Stouts Creek	64	Potential	2008	Botanical
Roseburg	Tater Hill RNA	303	Existing	1995	Natural Systems, Hazard (Active Slide)
Roseburg	Umpqua River Wildlife area	855	Existing, Proposed to Drop	1995	Wildlife

*Potential ACEC's were proposed under 2008 RMP, and are being managed under 'Interim management' following ACEC policy until RMP legal issues are resolved.
"Existing, proposed to drop", are ACEC's that no longer meet the Relevance and Importance criteria, would preclude sustained yield timber production on O&C lands, or don't need special management attention under the 2008 RMP. These too are under interim management.

Roseburg District – 2010 Resource Management Plan Evaluation
Allowable Sale Quantity Findings

1) Timber sales associated with the lands allocated to sustained yield timber production have departed substantially from the assumptions used in the RMP determination of the Allowable Sale Quantity (ASQ).

    - **ASQ Not Achieved** - During the evaluation period, sale volume was 43% of the declared ASQ.

    - **Regeneration Harvest - Below Assumed Level** - The RMP determination of the ASQ assumed 96% of the volume would come from regeneration harvest sales. During the evaluation period, regeneration volume was 9% of the RMP assumed level.

    - **Thinning Harvest - Exceeded Assumed Level** - The RMP determination of the ASQ assumed 4% of the volume would come from thinning sales. During the evaluation period, thinning volume was 771% of the RMP assumed level.

    - **Thinning Volume/Acre - Exceeded Assumed Level** - Thinning sale volume per acre was 177% of the RMP assumed level.

2) The current approach to a forest management regime that deviates so considerably from the RMP assumptions used in determination of the ASQ is not sustainable at the declared ASQ level.

    - The RMP determination of the ASQ is based upon an assumed cycle of regeneration and thinning harvest. Sustainability of the declared ASQ relies on the implementation of the assumed harvest.

    - The reduced level of regeneration sales has been a trend since 1998.

    - The declared ASQ was based on regeneration harvest of mature forest as the primary source of volume. The ASQ cannot be sustained at the currently declared level if regeneration harvest is not implemented.

    - Regeneration harvest conducted today would provide the stands available for thinning 30 to 40 years from now. The implementation trend of lower levels of regeneration harvest will reduce future thinning opportunities.

    - Accelerated rates of thinning without replenishment of younger forest stands through regeneration harvest means that opportunities for thinning will eventually be exhausted.

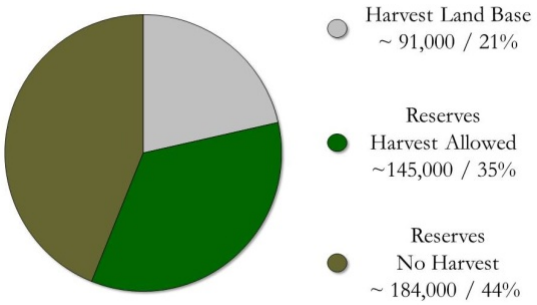
    - Increased intensity of thinning has long term effects on future thinning and regeneration harvest yields.

Roseburg District – 2010 Resource Management Plan Evaluation

Timber Resources – Supporting Data

Resource Management Plan Allocations Related to Timber Harvest[1]. Figure 1

The District's 419,000 [2] acres, as related to timber harvest, are described in three categories:



Harvest Land Base – These are the lands which are managed for sustained yield objectives and are the basis for the Allowable Sale Quantity (ASQ). The General Forest Management Areas, Connectivity Diversity Blocks, and Adaptive Management Area (AMA) allocations make up this category. This equates to the Matrix and AMA allocations of the Northwest Forest Plan.

Reserves Harvest Allowed – Harvest is allowed, for reserve land objectives, within Late-Successional and Riparian Reserves. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the reserve allocations. Timber sale volume from reserves does not contribute to the ASQ, because it is not a sustainable source of volume for the long term.

Reserves No Harvest – This category includes: Late-Successional and Riparian Reserves stands over age 80, recreation sites, lands not suitable for timber production, Areas of Critical Environmental Concern, and other allocations under the RMP in which timber harvest is generally not permitted.

Allowable Sale Quantity – ASQ Declaration

The O&C Act requires that the annual productive capacity be determined and declared. The ASQ is based on the capacity of the lands, allocated to sustained yield objectives, to produce timber at a level that will remain constant over time. The General Forest Management Area, Adaptive Management Area, and Connectivity Diversity Blocks (harvest land base) are the lands allocated for this purpose. In conjunction, the assumptions for the cycle, intensity, and harvest methods determine the sustainable harvest level from these lands. In simplistic terms, the sustained yield reflects a harvest rate that is in balance with forest growth on the harvest land base.

The 1995 Roseburg District Record of Decision declared the allowable sale quantity of 45 million board feet.

[1] Harvest Land Base data - 1995 ROD Table 1, Reserves categories estimated based on third-year evaluation age class data.
[2] Provided by Joe Graham, District Inventory Forester

Acronyms / Terminology

- ASQ - Allowable Sale Quantity.
- LSR - Late-Successional Reserves.
- Regeneration – Volume and acres associated with regeneration harvest.
- Thinning – Volume and acres associated with the range of harvest types, including commercial thinning, and density management.
- Evaluation Period – Fiscal years 2004 through 2010. Data is provided for the 16 years since the beginning of the RMP in some cases to provide context.
- Volume – Eastside Scribner 16 foot short log measure.

Evaluation Standards

RMP Assumptions / Projections - The underlying assumptions from the RMP determination of the ASQ are used as the standard to measure plan conformance. These assumptions include the levels of regeneration and thinning harvest volume and the associated treated acres. The term "projections" equates to the RMP assumptions over a period of time such as the evaluation period or the life of the plan.

Sold Timber Sales - The volume and acres associated with sold timber sales are used as the evaluation standard for implementation. Not all sold sales were implemented at the time of the evaluation. As of the end of fiscal year 2010, twenty sales totaling approximately 85 million board feet were sold but not awarded.

Disclaimer

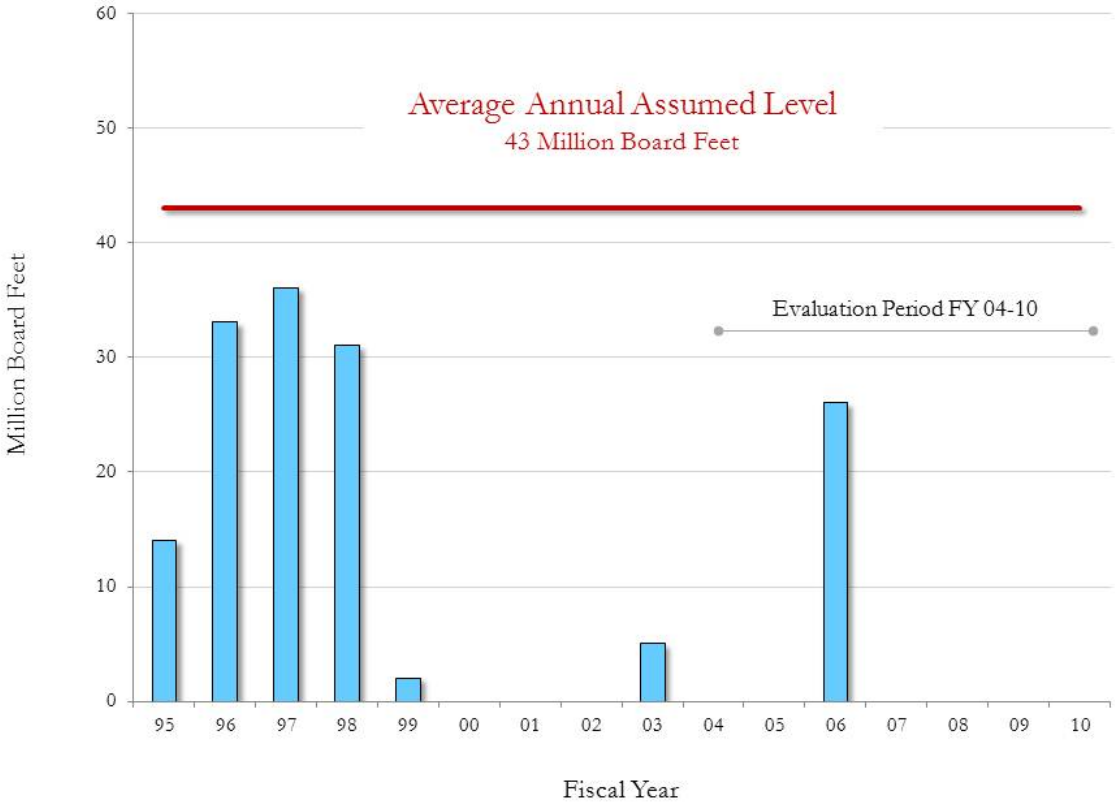
The data in this report was compiled from a variety of sources spanning over 16 years. There may be minor inconsistencies with previously reported information. The purpose of the data in this report is to portray the implementation of the timber sale program and how it conforms to the assumptions of the Resource Management Plans. The display of the data is intended to show the general magnitude for comparison purposes.

Evaluation of Timber Resources

1) ASQ - Regeneration / Thinning Volume and RMP Assumptions

Figure 2 – ASQ Regeneration Volume by Fiscal Year

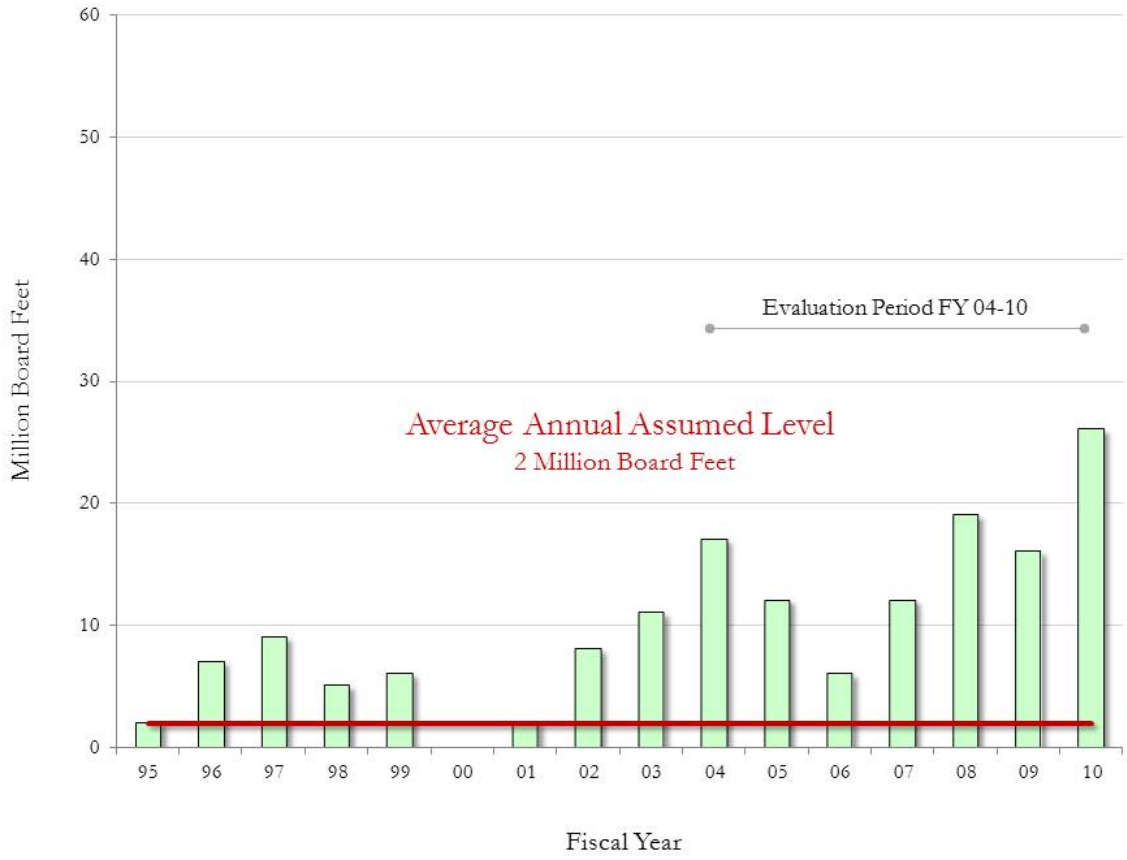
RMP assumed average annual volume level (red) compared with sold volume (blue).



- Regeneration sale volume has not occurred at the RMP assumed level.
- Since 1995, and during the evaluation period regeneration sale volume has averaged approximately 21% of the RMP assumed level. Most of the regeneration sale volume occurred in the early years of the plan.
- Evaluation Period
  - The average volume sold was 9% of the RMP assumed level.

Figure 3 – ASQ Thinning Volume by Fiscal Year

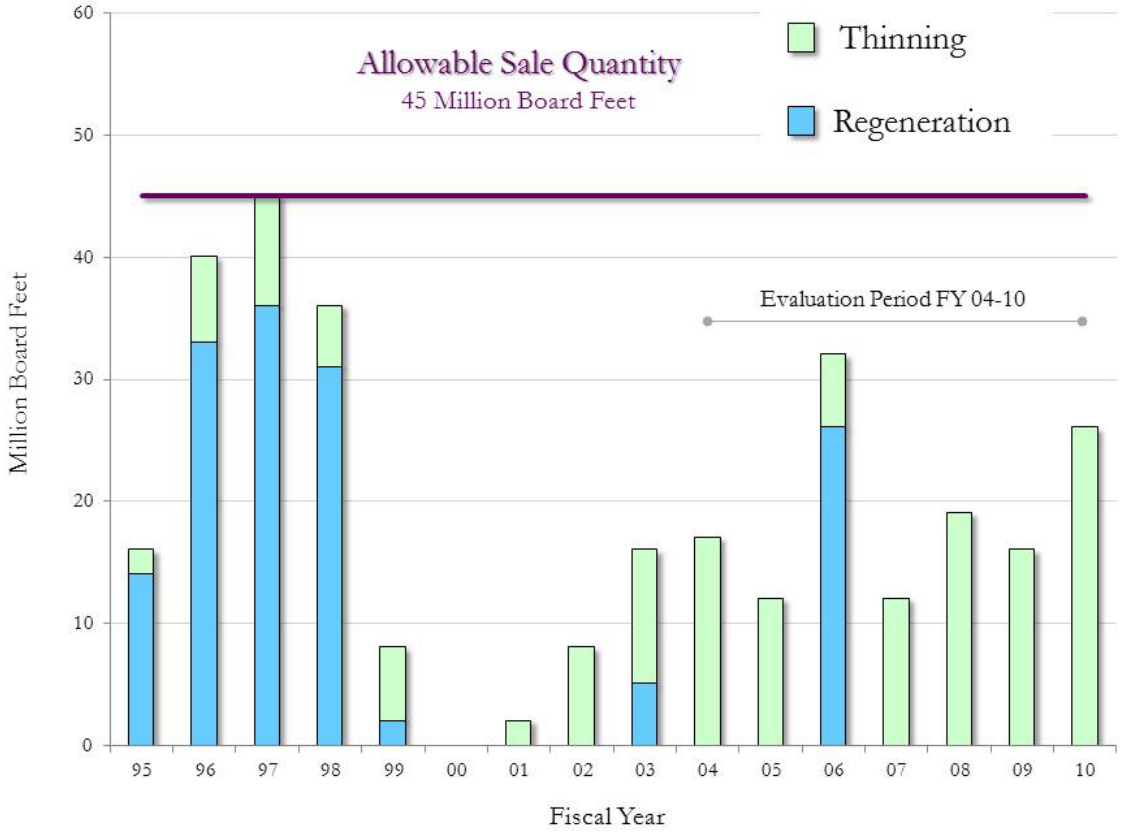
RMP assumed average annual volume level (red) compared with sold sale volume (green).



- Since 1995, thinning sale volume has exceeded the RMP assumed level.
- Evaluation Period
  - Thinning volume averaged 15.4 million board feet per year.
  - Thinning volume was 771% of the RMP assumed level.

Figure 4 – Total ASQ Volume by Fiscal Year

RMP declared Allowable Sale Quantity (purple) as compared with sale volume of regeneration (blue) and thinning (green) by fiscal year.

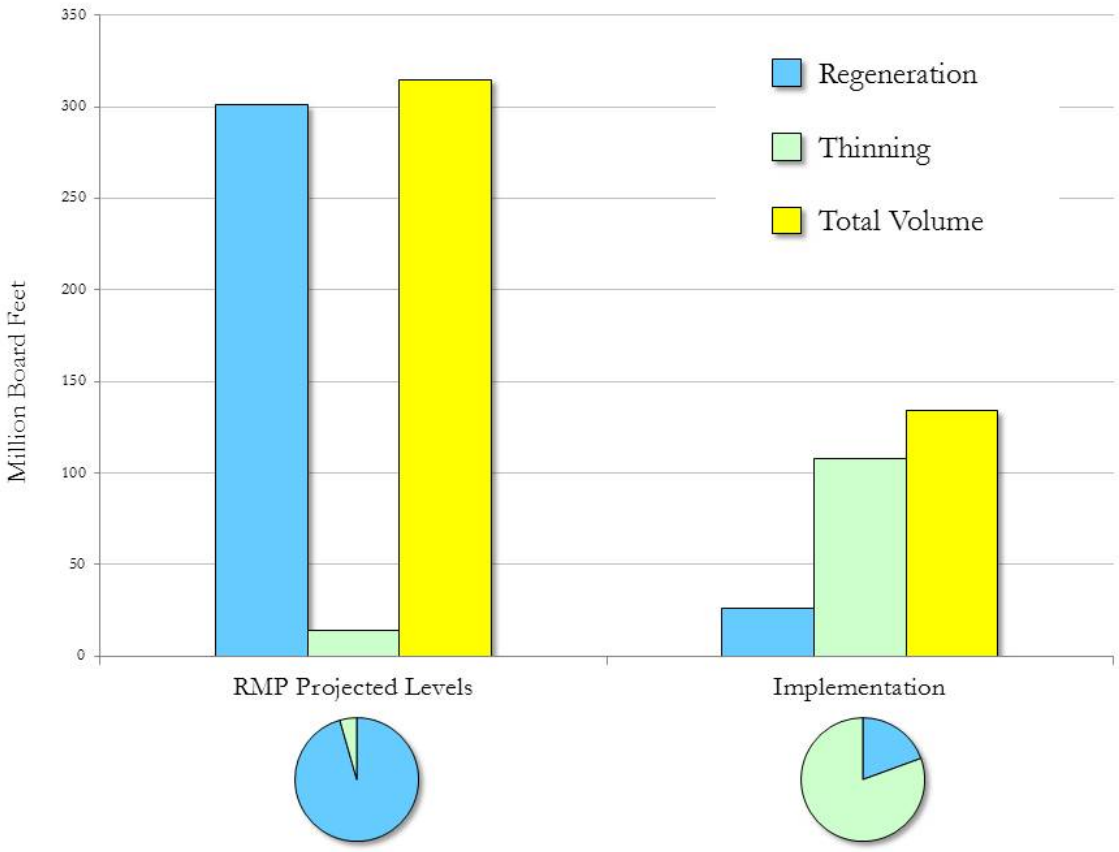


- The ASQ was generally achieved during the early years of the RMP with the anticipated ramp-up period.
- Since 1997 the ASQ has not been achieved..
- Evaluation period
    - Sold volume averaged approximately 19 million board feet annually.
    - Sold volume was 43% of the ASQ.

Figure 5 – Total ASQ Volume – Evaluation Period - Projected and Implementation.

Left bars and pie - RMP projected assumed levels for the evaluation period.

Right bars and pie - Implementation - timber sales sold during the evaluation period.

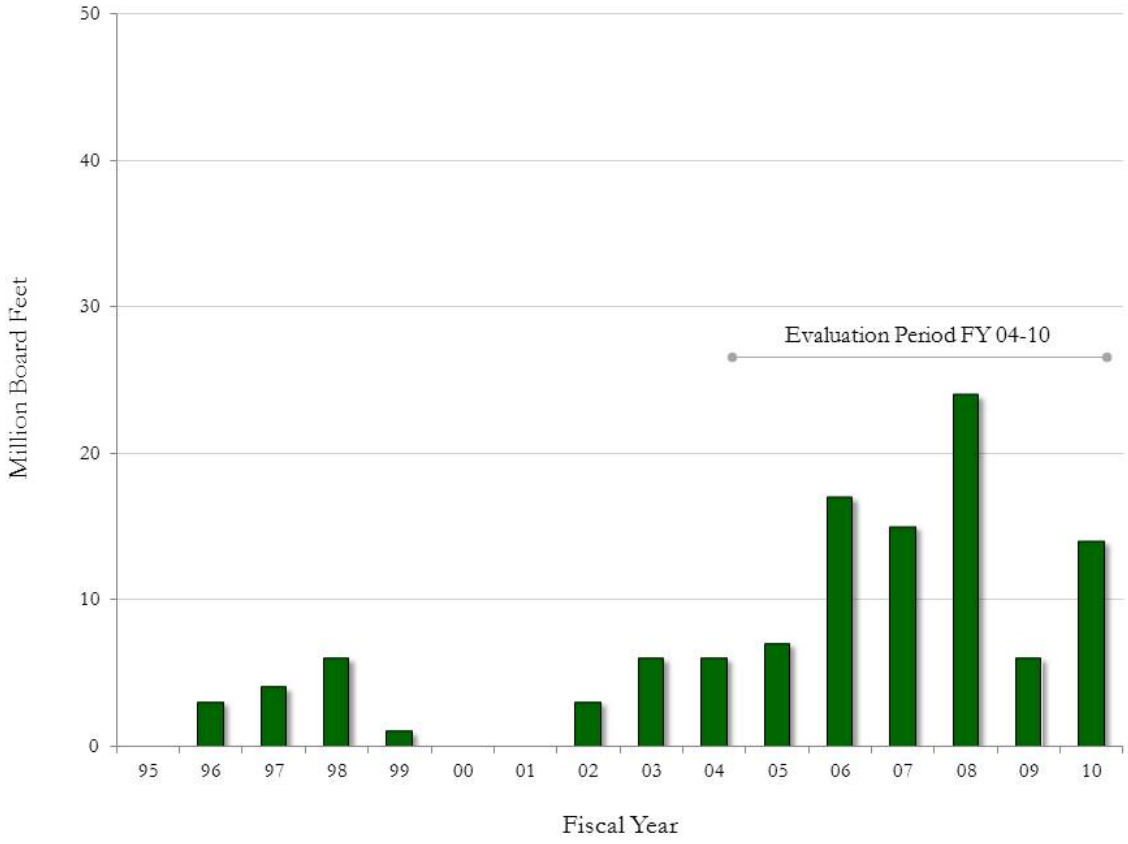


- Evaluation Period
  - Total sold volume was 43% of the RMP projected level.
  - Regeneration volume was 9% of the RMP projected level.
  - Thinning volume was 494% of the RMP projected level.
  - The RMP assumed that 96% of the volume would be from regeneration and 4% from thinning (left pie).
  - Sold sales were 19% regeneration and 81% thinning (right pie).

2) Non-ASQ - Reserve Volume

Harvest is allowed, for reserve land objectives, within LSR and Riparian Reserves. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the reserve allocations. Harvest from reserves does not contribute to the ASQ because it is not planned to be repeated over the long term and thus is not a sustainable source of volume.

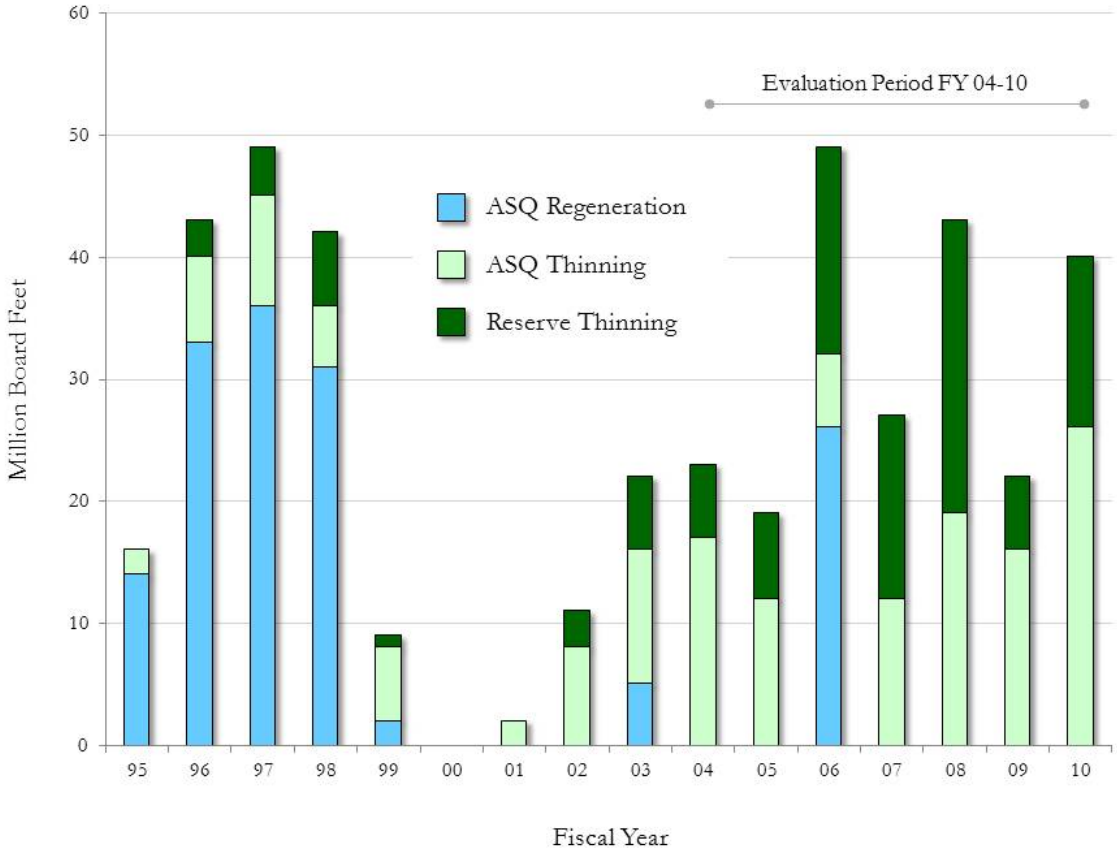
Figure 6 – Reserve Volume by Fiscal Year



- Evaluation Period
    - Sale volume from reserves averaged 12.7 million board feet annually, 89 million board feet total.

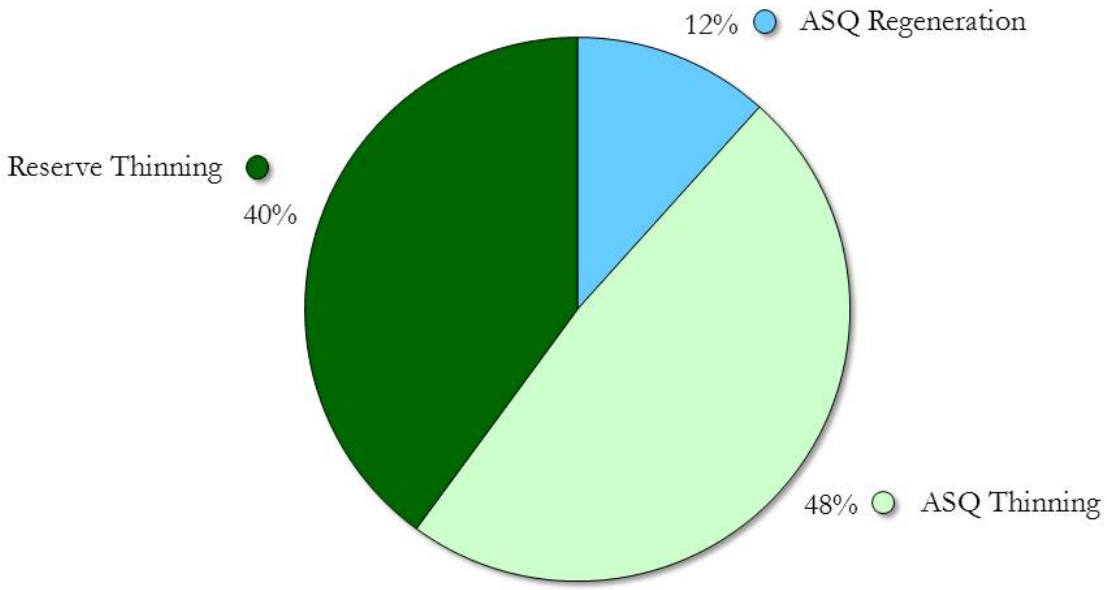
3) Total Volume - ASQ and Reserves

Figure 7 – Total Volume ASQ and Reserves



- Evaluation Period
    - Total volume sold averaged approximately 32 million board feet annually.
    - ASQ volume sold averaged approximately 19 million board feet annually.
    - Reserve volume sold averaged approximately 13 million board feet annually.

Figure 8 – Total Volume - ASQ and Reserves – Evaluation Period



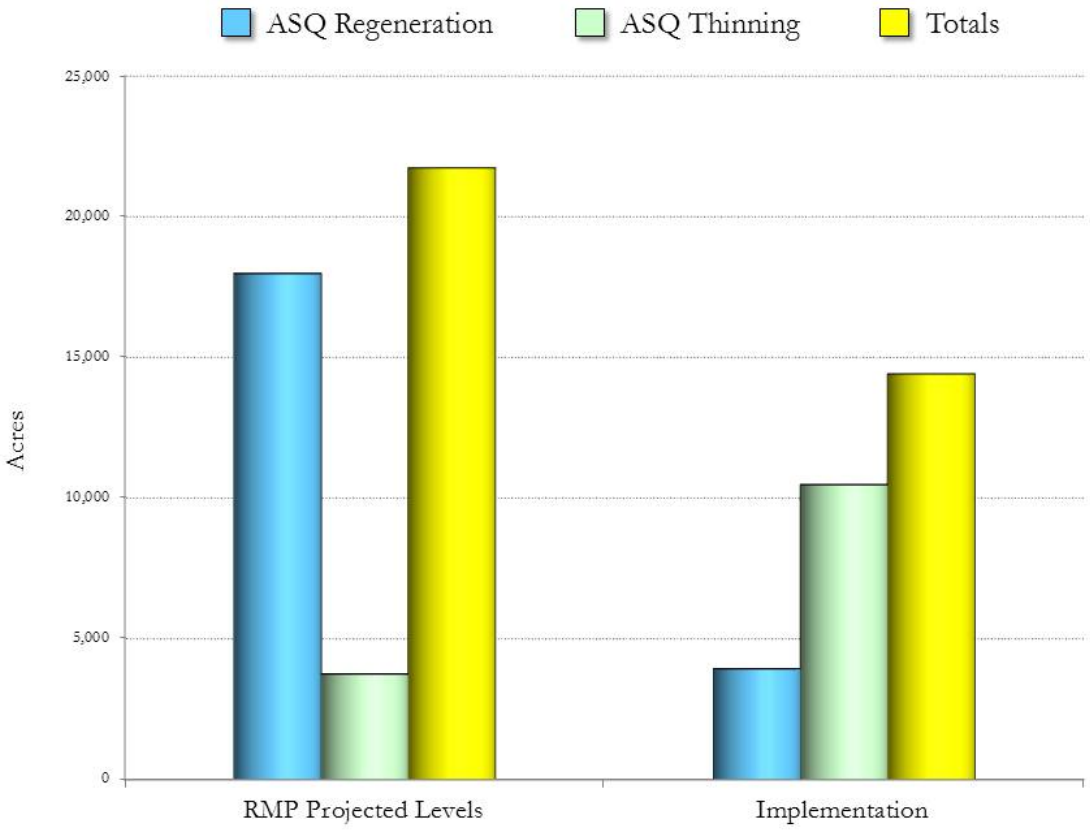
- Evaluation Period
  - 223 million board feet were sold during the evaluation period
  - ASQ contributed 60% of the total volume sold, 134 million board feet.
  - Reserves contributed 40% of the total volume sold, 89 million board feet.

4) ASQ Acres – Projected and Implementation

Figure 9 – Total Timber Sale Acres – Harvest Land Base - ASQ

Left bars - RMP projected assumed levels for FY1995-2010.

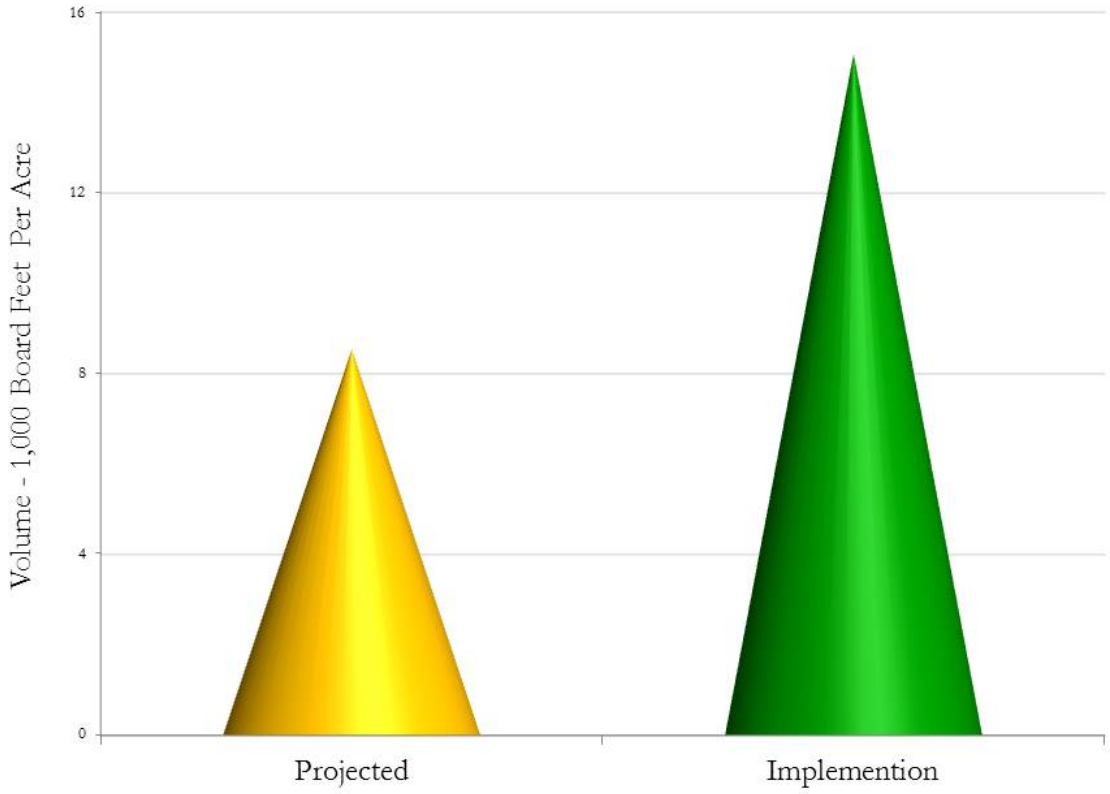
Right bars - Implementation of timber sales sold for FY 1995-2010.



- Fiscal Years 1995 – 2010
  - Regeneration sale acreage was 22% of the RMP projected level.
  - Regeneration sale acreage of stands 150 years and older were 21% of the RMP projected level (not displayed in the graphic).
  - Thinning sale acreage was 279% of the RMP projected level.
  - Total sale acreage was 66% of the RMP projected level.

5) ASQ Thinning Volume Per Acre – Projected and Implementation

Figure 10 – Projected Volume Per Acre and Implementation Fiscal Years 1995 - 2010.



- Fiscal Years 1995 – 2010
    - The determination of the ASQ assumed an average of approximately 8.5 thousand board feet would be harvested per acre with thinning harvest.
    - Over the life of the plan thinning sales have averaged slightly over 15 thousand board feet per acre.
    - The ASQ thinning volume per acre was 177% of the RMP projected level.

6) Changed Circumstances and New Information

- In 2008, the U.S. Fish and Wildlife Service designated new critical habitat for the northern spotted owl. This designation precludes sustained-yield timber management and has reduced the land available for harvest by approximately 21% from what was assumed by the 1995 RMP determination of the ASQ.

- The BLM has generally avoided timber sales within the home ranges of known or predicted spotted owl sites to minimize effects on spotted owls and owl habitat. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Management of Survey and Manage sites in the harvest land base was not considered in the determination of the ASQ. As sales are designed and sites are identified, acres are reserved from harvest units. The BLM has also been avoiding timber harvest on lands in the harvest land base which are likely to have occurrences of survey and manage species, because of the necessary investment in surveys and resulting effects of species occurrence on sale viability. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Marbled murrelet sites continue to be identified in the harvest land base, which results in re-designation of harvest land base acres to Late-Successional Reserves. The BLM has also been avoiding timber harvest on lands in the harvest land base which are likely to have occurrences of murrelet sites, because of the necessary investment in surveys and resulting effects of species occurrence on sale viability. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Anticipation of protests and appeals has caused the BLM to avoid regeneration harvest, especially regeneration harvest of older forest. This has implications for the sustainability of timber harvest, and has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- The 2008 FEIS evaluated the volume potential utilizing current inventory and improved mapped data on allocations. The 2008 FEIS analysis of continued implementation of the 1995 RMP (i.e., the No Action alternative in the 2008 FEIS) indicated the sustainable harvest level for the Roseburg District would be 56 million board feet. The 2008 FEIS analysis of continued implementation of the 1995 RMP indicated that there would be a potential non-ASQ harvest of 8 to 12 million board feet volume from reserves for the next 20 years.

RMP Evaluation Plan – District Questionnaire

1. **Do the 1995 RMP decisions appear to be correct and proper over time (e.g. is there a need for plan amendment or revision)?**
    a. Review 2004 Evaluation Report using "Questions an RMP Evaluation Should Answer" to determine if there is information that would invalidate conclusions from 2004 report (program is achieving identified RMP outcomes/no new RMP direction is needed/RMP EIS analysis is valid).
    b. Districts are not expected to collect new data beyond items in the RMP Evaluation Plan Spreadsheet or as needed under Item C below.
    c. A conclusion that there is new information that would change a program's 2004 evaluation conclusion regarding validity of 1995 decisions should be documented. Provide a narrative along with relevant data. Narrative should describe urgency of the need for changed/new RMP direction and implications if not addressed or delayed.

Roseburg District Response:

The District response is provided in the following two spreadsheets, please refer to:
"2011 Plan Evaluation Worksheet – Roseburg District BLM"
(2011_Rsbg_PlanEval_Worksheet_04_05_2011.xlsx)

"RMP Evaluation Plan Spreadsheet"
(Roseburg_2011 RMP Eval_Data Call_Single Sheet.xlsx)

Supporting data and a narrative is provided for all programs, including those where a "change in conclusion" was made relative to the 2004 evaluation, in the "2011 Plan Evaluation Worksheet – Roseburg District BLM".

2. **Are there targeted minor plan amendments or plan maintenance opportunities specific to your district (i.e. updated communication sites, land tenure) that would facilitate RMP implementation? Provide a narrative describing the need and timing.**

Roseburg District Response:

There are opportunities for minor plan amendments (i.e. Pacific Connector Gas Pipeline and within the Minerals and Energy Program) and multiple opportunities for plan maintenance (see below).

Pacific Connector Gas Pipeline

On September 4, 2007, Pacific Connector Gas Pipeline, LP filed an application with the Federal Energy Regulatory Commission (FERC) to construct a natural gas transport pipeline from the proposed Jordan Cove liquefied natural gas processing facility to be located in Coos Bay, Oregon to a series of distribution pipelines near Malin, Oregon. In addition to private lands, several National Forests, and lands managed by the Bureau of Reclamation, the pipeline would cross portions of the Coos Bay, Roseburg and Medford Districts, and the Klamath Falls Resource Area of the Lakeview District of the BLM.

The FERC released a Draft Environmental Impact Statement (EIS), in August of 2008, providing an analysis of the effects of construction of the proposed liquefied natural gas facility and the pipeline. Effects on lands under the administration of the BLM were evaluated in light of management direction from the 1995 Resource Management Plans.

The FERC released a Final EIS in May of 2009 that analyzed effects of the preferred pipeline route and proposed reroutes suggested in comments on the Draft EIS. This analysis considered effects on lands under the administration of the BLM in light of the December 2008 *Records of Decision for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management*.

By decision of the Secretary of the U.S. Department of the Interior, the 2008 *Records of Decision for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management* were withdrawn in July of 2009. This requires that approval of a right-of-way grant authorizing construction of the Pacific Connector Gas Pipeline conform to the 1995 Resource Management Plans for the Coos Bay, Roseburg and Medford Districts, and the Klamath Falls Resource Area of the Lakeview District.

In the spring of 2010, the BLM began evaluating the consistency and conformance of the Pacific Connector Gas Pipeline with the 1995 Resource Management Plans for the Coos Bay, Roseburg and Medford Districts, and Klamath Falls Resource Area of the Lakeview District in anticipation that plan amendments would be needed to accommodate the right-of-way grant. Four areas were identified where additional analysis was needed to make a consistency determination. These are: timber harvest in occupied marbled murrelet stands, right-of-way clearing in Late-Successional Reserves, Standards and Guidelines for Survey and Manage, and Aquatic Conservation Strategy consistency.

The BLM and U.S. Forest Service are now engaged, with the assistance of third-party contractors, in making final conformance and consistency determinations that will identify plan amendments that will be necessary for grant of the right-of-way for the natural gas pipeline.

Minerals and Energy

Rock Pits/Quarries – Historically, rock quarries on the district were developed in conjunction with timber sales to provide road surfacing material, but reduced harvest revenues are not adequate economically to pay for development and processing of surfacing rock from the districts rock sources and therefore the material is often purchased at increased cost from commercial sources. There are very few pits remaining where district staff can obtain rock without further pit development so the ability to meet the objectives of the RMP from a mineral material objective is not being met.

Conflicts with the requirements for other resources (e.g. S&M, reserve system, etc… discussed above) continue to create a level of unmet need for saleable minerals. The extent of this unmet need is still unknown.

The Roseburg District staff proposes that all functioning rock pits or, at a minimum, all community pits have an administrative withdrawal that would encompass an area of foreseeable pit or quarry expansion. This administrative withdrawal would alleviate conflicts with ROD/RMP guidance for other resources (e.g. LSR guidance, Survey and Manage standards and guidelines - as discussed previously).

Abandoned Mine Lands – Management action/direction needs to be added to the ROD/RMP to address abandoned mine lands (AML). This would facilitate clean up and any potential actions that would be undertaken through the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) vs. NEPA (pg. 39).

Opportunities for Plan Maintenance:

"Special Habitat" for Wildlife and Botanical Species - From the 1995 ROD/RMP glossary, special habitat may include: ponds, bogs, springs, sups, marshes, swamps, dunes, meadows, balds, cliffs, salt licks, and mineral springs (ROD/RMP, pg. 113). Most of these habitat features can also be protected through application of Riparian Reserve guidance for ponds/wetlands (ROD/RMP, pg. 24) or TPCC (ROD/RMP, pgs. 35, 139). It is atypical for such features to be protected with the "special habitat" provision in the ROD/RMP (100-200ft buffer, pg. 39); Riparian Reserve or TPCC is more commonly used instead. Of the 14 projects that were monitored, there were three instances of "special habitats" found associated with the project. Of these three instances, none appear to have been problematic for the successful implementation of the project or for the protection of the habitat feature itself. District staff recommend that: (a) the definition of which features should be considered as "special habitat" be better defined and (b) that ROD/RMP direction for protecting special habitat be more results-driven (e.g. preserve or enhance the feature) rather than prescriptive (e.g. 100-200 ft. buffer).

Marbled Murrelet "Bulge" – The 2008 RMP redefined the range of the marbled murrelet and excluded the "bulge". But that RMP has since been rescinded. There are still corrections needed regarding the marbled murrelet "bulge". In practicality, the District uses the habitat definition in the marbled murrelet listing package that defines the range of the marbled murrelet as 50-miles inland. In actuality, this excludes the "bulge"; but that illustration in the NWFP has not been corrected. Also, since 2005, a 1.3 mile Restriction Corridor on Berry Creek, Elk Creek (Umpqua Basin), Main stem Umpqua, and Middle Fork Coquille River has been included in consultation packages as part of the suite of marbled murrelet restrictions. The 1.3 mile Restriction Corridor provides Zone 1-type restrictions even though the streams/rivers are physically located in Zone 2.

Umpqua Corridor Habitat Management Plan – The Umpqua Corridor Habitat Management Plan is dated and should either be revised or direction in the 1995 ROD/RMP referring to it should be removed. This plan, written in 1985, generally provided protection for bald eagles, northern spotted owls, and osprey prior to the NWFP. The 1995 ROD/RMP directs that "implementation of the Umpqua Corridor Habitat Management Plan will continue" (pg. 49). Generally, the protections offered by the

Umpqua Corridor Habitat Management Plan for these species is now redundant with those in the 1995 ROD/RMP and current 6840 special status species policies. For example, the 1995 ROD/RMP established the Umpqua Wildlife ACEC (pg. 50) and the bald eagle, northern spotted owl, and osprey each have specific guidance (pgs. 49, 48, and 39 respectively). District staff recommend that plan maintenance be performed to remove the direction that the Umpqua Corridor Habitat Management Plan will continue to be implemented (or alternatively, that the Umpqua Corridor Habitat Management Plan should be updated).

"Quality of Life" in the Fire and Fuels Program – The objective "quality of life" has not been modified or redefined since 2004. The "quality of life" objective is presented in the Rural Interface Areas guidance from the 1995 ROD/RMP (pgs. 54-55, 204):

> *"Consider the interests of adjacent and nearby rural land owners, including residents, during analysis, planning, and monitoring related to managed rural interface areas. These interests include personal health and safety, improvements to property and quality of life." (pg. 54)*
>
> *"Use design features and mitigation measures to avoid/minimize impacts to health, life and property, and quality of life." (pg. 55)*

"Quality of life" is broad, ambiguous terminology that is subjective and lends itself to disagreement and multiple interpretations. It is recommended that the wording be improved (e.g. for human safety and protection of property); possibly in conjunction with the CWPP update.

Off-highway Vehicle Use – There is a need for District wide travel management planning due to legal access issues, trespass, and resource damage; an ID Team will begin development of a CTTMP in 2012. There is a need to change the existing OHV from "limited to existing" to "limited to designated" roads and trails. The CTTMP is expected to be a District-wide EIS but no amendment would be needed because changes would be within the "limited" category. The CTTMP will involve adjacent private landowners, primarily timber companies, in a controversial issue of legal right of way complexities. The CTTMP reflects implementation of the 1995 ROD/RMP but does not reflect a change in conclusions from 2004. Note: CTTMP and "limited" category changes are also being addressed by the OSO in "common to all".

Wild & Scenic Rivers – No new rivers have been identified to study for potential inclusion into the Wild and Scenic River system. There were three rivers identified in the 1995 ROD/RMP as eligible but did not meet minimum suitability requirements (i.e. Cow Creek, South Umpqua River, Umpqua River) and two rivers that were eligible and determined to be unsuitable (i.e. Canton Creek, Smith River). There is guidance in the 1995 ROD/RMP (pgs. 54-55) that actions within a 1/2 mile corridor must have either a positive or neutral effect on identified Outstandingly Remarkable Values on "eligible/suitable" rivers. There is some confusion amongst staff as to which rivers this guidance applies to. District staff recommends that plan maintenance clarify that the

guidance for "eligible/suitable" rivers applies to those rivers that are both eligible AND suitable. This guidance (from 1995 ROD/RMP, pgs. 54-55) would also apply to those rivers identified as "eligible" in the future until the suitability determination has been completed.

Invasive Species/Noxious Weeds – Herbicide use is covered under our current Pesticide Use Proposal (OR-100-09-001) which is valid until 2012. A DNA to the existing EA has not been done since 2005. A new District EA tiered to the 2010 Vegetation Treatments Using Herbicides on BLM Lands in Oregon is currently in preparation. It will replace the existing 1994 programmatic EA and is intended to allow the use of additional herbicides not addressed in the 1994 EA. The ROD/RMP states that integrated pest management will conform with the 1985 Northwest Area Noxious Weed Control Program EIS and the 1987 Supplement. District staff recommends that plan maintenance should update this reference to the 1985 EIS and 1987 supplement with the 2007 Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States Programmatic EIS and the subsequent 2010 Oregon EIS. Although there is new information that would be more appropriate to cite in plan maintenance, this does not reflect a change in conclusions from 2004.

3. Has implementation of the timber harvest program been consistent with the assumptions of the declared Allowable Sale Quantity? Specifically:

a. Have the mix of regeneration and thinning harvest in the harvest land base been consistent with the assumptions of the Allowable Sale Quantity (ASQ)?
b. Has regeneration harvest occurred across the range of age classes as assumed in the ASQ determination?
c. How much of the annual harvest has come from reserves?
d. What is the harvest volume trend, for regeneration and thinning harvest, as compared to the ASQ and RMP assumptions?
e. Have the assumptions for lands available for harvest changed?

The districts are requested to provide the data for the Timber Resources portion of the RMP Evaluation Plan Spreadsheet to Chris Cadwell by February 4th 2011. In addition to the data in the spreadsheet, the districts will be requested to provide a short narrative on the status of sales which are:

- no bid,
- re-offers,
- mutually cancelled, and
- sold unawarded as of the end of FY2010.

Details of this narrative are outlined in the spreadsheet. A first draft of a narrative to address the 5 questions above will be developed by the OSO based on the data provided by the Districts. The District Forestry staff and Planners will be provided the draft narrative for their review and input before it is finalized.

<u>RMP Objective (Matrix):</u>
Produce a sustainable supply of timber and other forest products.

RMP Management Direction:
Conduct timber harvest and other silvicultural activities in that portion of the Matrix with suitable forest lands according to management actions/direction in the Timber Resources section.

Roseburg District Response:

A separate team, led by Chris Cadwell, will provide evaluation of the timber program for the District. Also refer to the Roseburg – "District Data Request for Timber Resources - 2011 RMP Evaluation" (GRAHAM_Roseburg 2010 Evaluation for Timber Resources ver3.1.xlsx) spreadsheet provided by Joe Graham.

4. In the Medford District, how does the amount of Northern Spotted Owl habitat lost to wildfires compare to predicted levels described in the Northwest Forest Plan FEIS (P. 3&4-42)?

Roseburg District Response:

Not applicable to the Roseburg District.

5. Were there any other programs shown as departing from expected RMP outcomes in the 2004 Plan Evaluations for your district? Determine if they are still departing from expected outcomes and provide a narrative along with relevant data. Provide a narrative along with relevant data. Narrative should describe urgency of the need for changed/new RMP direction and implications if not addressed or delayed.

Roseburg District Response:

Supporting data and a narrative is provided for all programs, including those shown as departing from RMP outcomes, in the "2011 Plan Evaluation Worksheet – Roseburg District BLM".

Programs that were shown in the 2011 evaluation as still departing from expected RMP outcomes include:

- Matrix LUA,
- Little River AMA LUA,
- Timber Management Program,
- Silviculture Program,
- certain aspects of the Wildlife Habitat program (i.e. special habitat, habitat data layers for northern spotted owl and marbled murrelet, and the marbled murrelet "bulge"),
- certain aspects of the Air Quality and Fire and Fuels program (i.e. prescribed burning and "quality of life" terminology),
- certain aspects of the Botany program (i.e. special habitat), and
- Minerals and Energy Program.

Programs that were shown in the 2011 evaluation as newly (i.e. since 2004) departing from expected RMP outcomes include:

- certain aspects of the Special Forest Products Program (i.e. firewood cutting areas),
- certain aspects of the Lands and Realty Program (i.e. utility corridors specific to the Pacific Connector Gas Pipeline),
- Roads, Access, Right-of-Way Program,
- Off-highway Vehicle Use Program,
- certain aspects of the NLCS Program (i.e. wilderness), and
- certain aspects of the Invasive Species/Noxious Weeds Program (i.e. noxious weed control methods).

Appendix 7

Medford District Supporting Data

Table of Contents

Medford District – RMP Evaluation Spreadsheet

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Land Use Allocations		X			1. The Cascade-Siskiyou National Monument RMP superseded the Medford District RMP; these updates in land use allocation need to be reflected in any future RMP revision. 2. Spotted Owl 100 acre cores are not all 100 acres. It would be good to allow for minor changes in boundaries, within certain restrictions, to attain management objectives.
Watershed Analysis	X				
Timber Management			X		1. Data updated with supplemental information; conclusions of not meeting RMP targets remain unchanged. Data indicates that units selected for harvest exhibited low stocking levels, subsequently contributing to the lower volume levels. • Regeneration Harvest: Volume sold is 31 percent of the projected volume over 15 years of plan implementation. Acres covered 78 percent of the projected land base over the 15 years of the plan. • Commercial Thinning/Density Management: Volume sold is 121 percent of the projected volume over 15 years of plan implementation. Acres covered 235 percent of the projected land base over the 15 years of the plan.
Silviculture			X		Data updated with supplemental information
Forest and Woodlands Management (K Falls)	**N/A for Medford**				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Special Forest Products, Biomass	X				Will try and capture more biomass in Stewardship contracts, and where economically and logistically possibly, in our Timber Sale contracts.
Soils	x				Modifications to the 2004 evaluation are in the narrative.
Hydrology	x				1. Information collected during stream/riparian inventories needs to be entered into the BLM corporate databases for use in NEPA analysis. 2. The increasing level of unauthorized OHV use and resulting impacts on soil and water quality were not foreseen or analyzed by the RMP. 3. Riparian and water quality impacts from livestock grazing continue to be a concern and are not addressed in the RMP. 4. Modifications to the 2004 evaluation are in the narrative.
Wildlife Habitat		X			Snag/down wood models are based on old data and remain inadequate to meet the objectives identified in the RMP. Dec Aid lacks literature for SW OR.
Wildlife including Special Status Species		X			1. NSO Recovery Plan and new Conservation Strategies should be incorporated into the RMP. 2. RMP guidelines for owls in the Medford District do not reflect the importance of SW Oregon owls in maintenance and recovery of the species. 3. New candidate species have been warranted for listing since 2004: Pacific fisher, Mardon skipper & Siskiyou Mountain Salamander 4. The Conservation Strategy for the Siskiyou Mountain Salamander should be incorporated into the RMP

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Botany including Special Status Species	X				1. RMP amendment or revision is needed because Critical Habitat for Cook's lomatium was designated by the US Fish and Wildlife Service in 2010. 2. Consultation for the Cook's lomatium Critical Habitat will be completed in FY 2011. Data updated in the narrative.
Fisheries including Special Status Species	X				Population viability analysis is costly and impracticable.
Air Quality and Fire and Fuels	X				1. Air quality and effects of burning plastic both on human health and GHG emissions need to be addressed in any future RMP revision.2. Changes in carbon storage due to forest management activities need to be analyzed at the local and regional level along with development of a method for measuring and tracking changes.
Rural Interface	X				
Lands and Realty, Special use Permits, Utility Corridors, Communication Sites	X				1. Data updated in narrative. 2. An assessment should be made on potential for assignment of lands with encroachments to Zone 3, providing an additional management option for these lands.
Roads, Access, Rights-of-Way	X				The Western Oregon Districts Transportation Management Plan (TMP) has been newly updated. The narrative provides details. Some changes in Roads & Engineering.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Recreation		X			1. Unmet needs include additional SRMAs managed for environmental education, off-highway vehicle use, mountain bike and/or equestrian use; permitting for large group events or filming opportunities. There are no objectives or management actions identified for special recreation permit issuance in the RMP. Use of firearms in and around the Wildland-Urban Interface, recreational sites, wild and scenic river corridors and other similar areas is not addressed in the RMP. 2. Presidential Proclamation 7318 established the Cascade-Siskiyou National Monument (CSNM), including the Soda Mountain Wilderness. CSNM RMP implemented in 2008. Soda Mountain Wilderness Stewardship Plan and EA published in 2011. 3. The Federal Lands Recreation Enhancement Act (REA) was passed in the 2005 Consolidated Appropriations Act (PL 108-447) signed into law in 2004. 4. BLM's H-1601-1 Land Use Planning Handbook was revised in March 2005 5. The Recreation and Visitors Services guidance in H-1601-1 Land Use Planning Handbook was revised in October of 2010 (WO-IM-2011-004). 6. H-2930-1, Recreation Permit Administration Handbook was revised in 2006. 7. See narrative for details on these changes.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Off-highway Vehicle Use	X				1. Draft EIS for the Timber Mountain OHV Area was released in 2009. 2. Quartz Creek OHV area is currently in the NEPA phase with an EA in process. 3. A comprehensive OHV route inventory project that began in 2006 has identified other high-use concentrated OHV areas that could be managed for such uses.
Visual Resource Management		X			1. VRM guidance for CSNM and Soda Mountain Wilderness can be found in the 2008 Cascade-Siskiyou National Monument ROD/RMP. 2. The change in acres or mapping excluding CSNM for visual resources has not occurred in the 1995 ROD/RMP.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
NLCS (Wilderness, Wild and Scenic Rivers, National Monuments, etc.)	X				1. NLCS is a new classification since the 2004 Evaluation 2. Goals, objectives and management actions for the CSNM are in its 2008 ROD/RMP. Under the direction of the CSNM plan, the district is currently developing a wilderness plan for Soda Mountain. 3. Historic trails are not addressed in the RMP; management direction for those trails can be found in the 1999 Comprehensive Management and Use Plan for the California, Pony Express, Oregon, and Mormon Pioneer National Historic Trails (USDI-NPS). 4. Two proposed bills (Oregon Treasures Act of 2008 - HR. 6291, and Lower Rogue Wild and Scenic Rivers Act of 2008 - S. 3149) identified six river segments on the Medford District that were not studied for eligibility or suitability during the RMP planning process. 5. The ROD/RMP has no mention of lands with wilderness characteristics. 6. New 6310 Wilderness Manuals drafted in 2010 - finalized in Feb. 2011
Areas of Critical Environmental Concern	X				2004 Evaluation included Environmental Education Areas in the count of ACECs. Number of ACECs updated in narrative.
Significant Caves	X				Management Plans for significant caves may be inadequate, although RMP direction is adequate for protection of these resources. *Changed from "Change in Conclusion" to No Change in Conclusion" RMP Adequate, but no Management Plans completed*
Abandoned Mine Lands	X				1. AML needs to be expanded to include new national direction and occurrences outside Rural Interface Areas. 2. National AML Handbook (2007)

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion	
Invasive Species/Noxious Weeds	X				Information updated in narrative
Archeology, Paleontology, Cultural & Historic Resources, including Native American Values		X			Some new information (in narrative) that does not affect RMP revision importance. RMP inadequate for protecting Paleontological resources.
Renewable Energy and Adverse Energy Impact Assessments	X				
Rangeland Resources, Livestock Grazing and Wild Horse & Burro Management	X				One new plan affecting grazing, the Cascade-Siskiyou National Monument. Data has been updated. RMP adequate and District meeting expected outcomes.
Minerals and Energy		X			1. Desired outcomes for withdrawal of lands from mineral entry are not being met. 2. Clarification needed between 43 CFR 3809 regulations and RMP guidance.
Hazardous Materials	X				
Socioeconomic conditions (e.g., Jobs in the Woods, Payments, Contracting, Management Actions)		X			1. Sec. 5.2.1 - references S&M and ACS EISs. These are no longer valid. 2. Tables 6.1-1, 6.1-2 & 6.2-1 need to be updated 3. Socioeconomic analysis is inadequate. 4. Contribution of recreation and aesthetic values; analysis of ecosystem services. 5. Change in local and regional infrastructure supporting wood supplies and manufacturing since 1995.

Medford District ACECs

District	Name	Acres	Status	Year Designated	Relevant and Important Values
Medford	Baker Cypress	11	Existing, Proposed to Drop	1995	Natural Systems, Botanical
Medford	Bobby Creek RNA	1914	Existing	1995	Natural Systems, Botanical and Wildlife
Medford	Brewer Spruce RNA	1707	Existing	1995	Natural Systems, Botanical
Medford	Cobleigh Road	261	Potential	2008	Botanical
Medford	Crooks Creek	147	Existing	1995	Natural Systems, Botanical and Wildlife
Medford	Dakubetede Wildland	1796	Potential	2008	Historic, Wildlife, Natural Systems, Botanical
Medford	East Fork Whiskey Creek	3188	Potential	2008	Wildlife, Botanical
Medford	Eight Dollar Mountain	1249	Existing	1985	Historic, Botanical, Natural Systems
Medford	French Flat	651	Existing	1995	Historic, Natural Systems, Botanical
Medford	Greyback Glades RNA	1021	Existing	1995	Natural Systems
Medford	Hole-In-The-Rock	63	Existing, Proposed to Drop	1995	Geologic, Scenic
Medford	Holton Creek RNA	421	Existing	1995	Scenic, Natural Systems
Medford	Hoxie Creek	255	Existing, Proposed to Drop	1995	Scenic, Wildlife, Natural Systems
Medford	Iron Creek	286	Existing, Proposed to Drop	1995	Natural Systems

District	Name	Acres	Status	Year Designated	Relevant and Important Values
Medford	King Mountain Rock Garden	49	Existing	1986	Scenic, Botanical
Medford	Long Gulch	1020	Potential	2008	Wildlife, Natural Systems, Hydrologic
Medford	Lost Lake RNA	387	Existing	1995	Wildlife, Natural Systems
Medford	Moon Prairie	92	Existing, Proposed to Drop	1995	Scenic, Wildlife, Natural Systems
Medford	North Fork Silver Creek RNA	499	Existing	1995	Natural Systems, Botanical
Medford	Old Baldy RNA	115	Existing	1995	Natural Systems
Medford	Oregon Gulch RNA	1051	Existing	1995	Wildlife, Natural Systems, Botanical
Medford	Pickett Creek	32	Potential	2008	Botanical
Medford	Pipe Fork RNA	516	Existing	1995	Wildlife, Natural Systems
Medford	Poverty Flat	29	Existing	1995	Natural Systems, Vernal Pools, Botanical
Medford	Reeves Creek	117	Potential	2008	Natural Systems, Botanical
Medford	Rough and Ready	1181	Existing	1995	Scenic, Natural Systems, Botanical
Medford	Round Top Butte RNA	605	Existing	1995	Scenic, Natural Systems (National Natural Landmark)
Medford	Scotch Creek RNA	1799	Existing	1995	Natural Systems, Botanical

District	Name	Acres	Status	Year Designated	Relevant and Important Values
Medford	Sterling Mine Ditch	143	Existing, Proposed to Drop	1995	Historic, Scenic, Botanical
Medford	Table Rocks ACEC/ONA	1244	Existing	1984	Geological, Botanical, Scenic, Fish/Wildlife, Natural Systems (Vernal Pools)
Medford	Tin Cup	83	Existing, Proposed to Drop	1995	Natural Systems
Medford	Waldo-Takilma	1760	Potential	2008	Historic, Botanical
Medford	Whiskey Creek Fen	633	Potential	2008	Botanical, Natural Systems
Medford	Woodcock Bog RNA	265	Existing	1981	Natural Systems, Botanical

*Potential ACEC's were proposed under 2008 RMP, and are being managed under 'Interim management' following ACEC policy until RMP legal issues are resolved. "Existing, proposed to drop", are ACEC's that no longer meet the Relevance and Importance criteria, would preclude sustained yield timber production on O&C lands, or don't need special management attention under the 2008 RMP. These too are under interim management.

Medford District – 2010 Resource Management Plan Evaluation
Allowable Sale Quantity Findings

1) Timber sales associated with the lands allocated to sustained yield timber production have departed substantially from the assumptions used in the RMP determination of the Allowable Sale Quantity (ASQ).

    - **ASQ Not Achieved** - During the evaluation period, sale volume was 56% of the declared ASQ.

    - **Regeneration Harvest - Below Assumed Level** - The RMP determination of the ASQ assumed 60% of the volume would come from regeneration harvest sales. During the evaluation period, regeneration volume averaged 16% of the RMP assumed level.

    - **Thinning Volume/Acre - Below Assumed Level** - Thinning sale volume per acre was 49% of the RMP assumed level.

    - **Total Sale Acreage - Exceed Assumed Level** - Over the life of the plan the total sale acreage sold was 176% of the assumed level. The thinning acreage was 251% of the RMP assumed level and was the cause for the total acreage departure.

2) The current approach to a forest management regime that deviates so considerably from the RMP assumptions used in determination of the ASQ is not sustainable at the declared ASQ level.

    - The RMP determination of the ASQ is based upon an assumed cycle of regeneration and thinning harvest. Sustainability of the declared ASQ relies on the implementation of the assumed harvest.

    - The reduced level of regeneration sales has been a trend over the life of the plan.

    - The declared ASQ was based on regeneration harvest of mature forest as the primary source of volume. The ASQ cannot be sustained at the currently declared level if regeneration harvest is not implemented.

    - Regeneration harvest conducted today would provide the stands available for thinning 45-60 years from now. The implementation trend of lower levels of regeneration harvest will reduce future thinning opportunities.

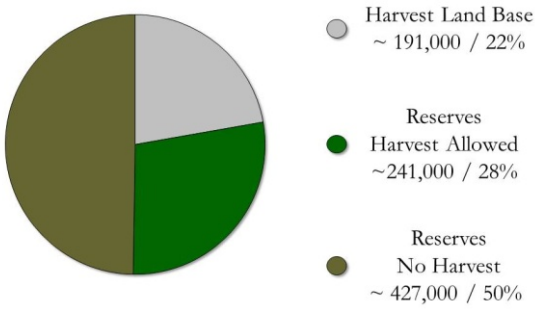
    - Implementation of sales at approximately 56% of the ASQ while exceeding the assumed harvest acres by 176%, for full implementation of the ASQ, raises questions about the adequacy of the cumulative effects analysis supporting the 1995 RMP.

Medford District – 2010 Resource Management Plan Evaluation

Timber Resources – Supporting Data

Resource Management Plan Allocations Related to Timber Harvest[1]. Figure 1

The District's 859,100 [2] acres, as related to timber harvest, are described in three categories:



Harvest Land Base – These are the lands which are managed for sustained yield objectives and are the basis for the Allowable Sale Quantity (ASQ). The General Forest Management Areas, Connectivity Diversity Blocks, and Adaptive Management Area (AMA) allocations make up this category. This equates to the Matrix and AMA allocations of the Northwest Forest Plan.

Reserves Harvest Allowed – Harvest is allowed, for reserve land objectives, within Late-Successional[3] and Riparian Reserves. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the reserve allocations. Timber sale volume from reserves does not contribute to the ASQ, because it is not a sustainable source of volume for the long term.

Reserves No Harvest – This category includes: Late-Successional and Riparian Reserves stands over age 80, recreation sites, lands not suitable for timber production, Areas of Critical Environmental Concern, and other allocations under the RMP in which timber harvest is generally not permitted.

Allowable Sale Quantity – ASQ Declaration

The O&C Act requires that the annual productive capacity be determined and declared. The ASQ is based on the capacity of the lands, allocated to sustained yield objectives, to produce timber at a level that will remain constant over time. The General Forest Management Area, Adaptive Management Area, and Connectivity Diversity Blocks (harvest land base) are the lands allocated for this purpose. In conjunction, the assumptions for the cycle, intensity, and harvest methods determine the sustainable harvest level from these lands. In simplistic terms, the sustained yield reflects a harvest rate that is in balance with forest growth on the harvest land base.

The 1995 Medford District Record of Decision declared the allowable sale quantity of 57 million board feet.

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[1] Harvest Land Base data - 1995 ROD Table 1, Reserves categories estimated based on third-year evaluation age class data.
[2] 1995 ROD Table 1.
[3] Adaptive Management Areas within Late-Successional Reserves (LSRs) are counted as LSRs in the evaluation.

Acronyms / Terminology

- ASQ - Allowable Sale Quantity.
- LSR - Late-Successional Reserves.
- Regeneration – Volume and acres associated with regeneration harvest.
- Thinning – Volume and acres associated with the range of harvest types, including commercial thinning, and density management.
- Evaluation Period – Fiscal years 2004 through 2010. Data is provided for the 16 years since the beginning of the RMP in some cases to provide context.
- Volume – Eastside Scribner 16 foot short log measure.

Evaluation Standards

RMP Assumptions / Projections - The underlying assumptions from the RMP determination of the ASQ are used as the standard to measure plan conformance. These assumptions include the levels of regeneration and thinning harvest volume and the associated treated acres. The term "projections" equates to the RMP assumptions over a period of time such as the evaluation period or the life of the plan.

Sold Timber Sales - The volume and acres associated with sold timber sales are used as the evaluation standard for implementation. Not all sold sales were implemented at the time of the evaluation. As of the end of fiscal year 2010, 26 million board feet were returned to the government by mutual contract cancelation[4]. An additional 45 million board feet were in sold sales which had not been awarded.

Disclaimer

The data in this report was compiled from a variety of sources spanning over 16 years. There may be minor inconsistencies with previously reported information. The purpose of the data in this report is to portray the implementation of the timber sale program and how it conforms to the assumptions of the Resource Management Plans. The display of the data is intended to show the general magnitude for comparison purposes.

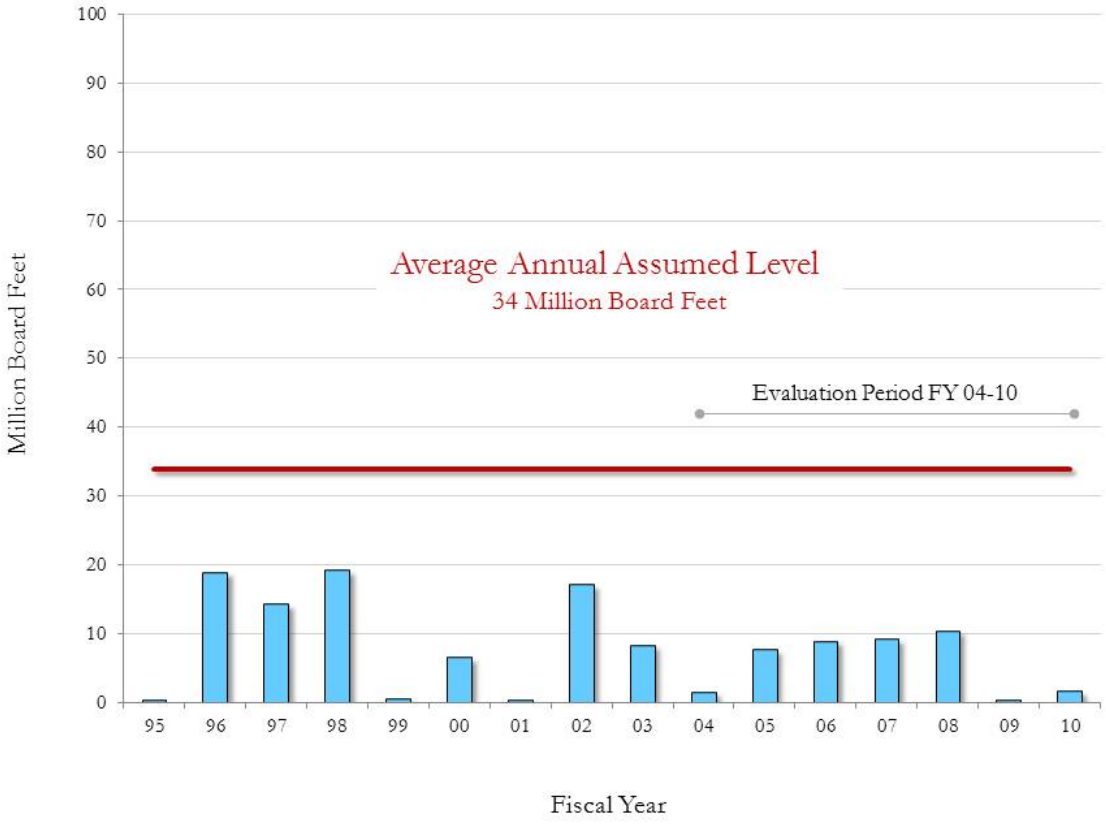
[4] Washington Office Instruction Memorandum No. 2010-003

Evaluation of Timber Resources

1) ASQ - Regeneration / Thinning Volume and RMP Assumptions

Figure 2 – ASQ Regeneration Volume by Fiscal Year

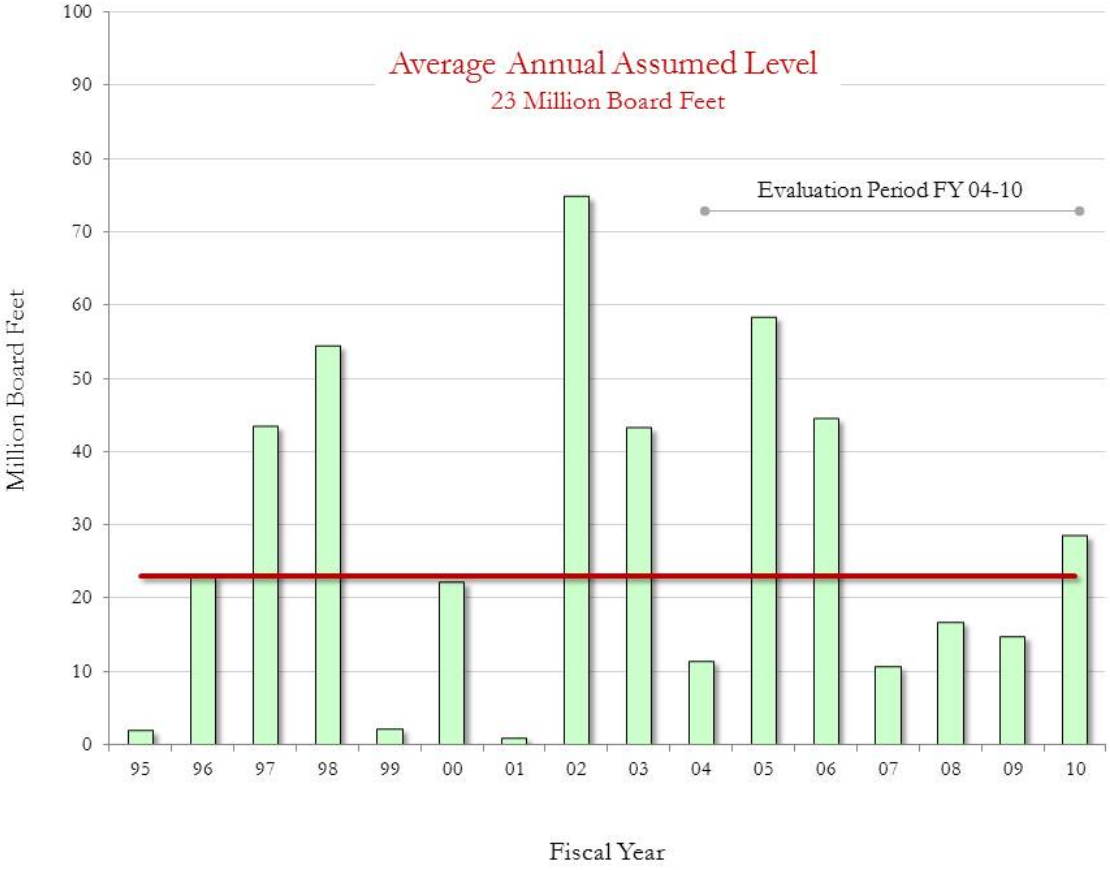
RMP assumed average annual volume level (red) compared with sold volume (blue).



- Regeneration sale volume has not occurred at the RMP assumed level.
- Since 1995 and during the evaluation period regeneration sale volume has averaged approximately 23% of the RMP assumed level.
- Evaluation Period
    - Regeneration sale volume averaged approximately 5.5 million board feet annually or 16% of the RMP assumed level.

Figure 3 – ASQ Thinning Volume by Fiscal Year

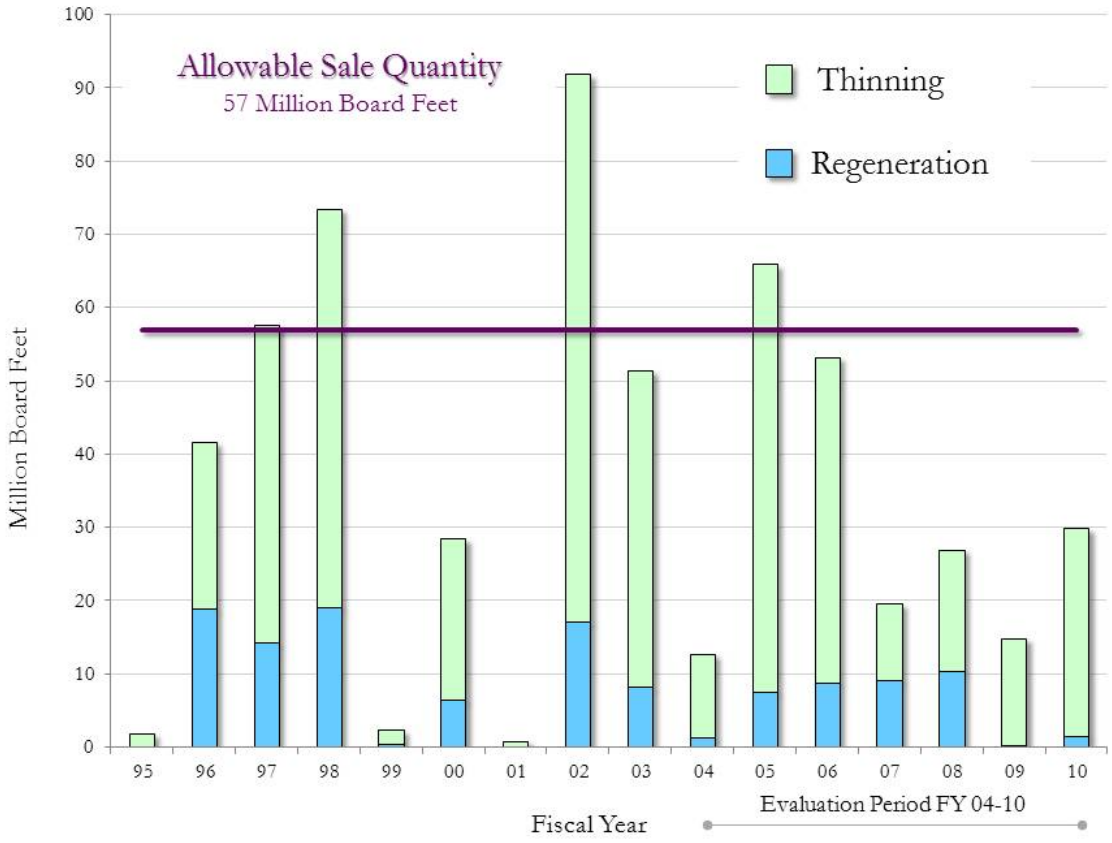
RMP assumed average annual volume level (red) compared with sold sale volume (green).



- Since 1995, thinning sale volume has varied on a yearly basis. On average thinning sales were 122% of the RMP assumed level.
- Evaluation Period
    - Thinning volume averaged approximately 26 million board feet per year.
    - Thinning volume was 115% of the RMP assumed level.

Figure 4 – Total ASQ Volume by Fiscal Year

RMP declared Allowable Sale Quantity (purple) as compared with sale volume of regeneration (blue) and thinning (green) by fiscal year.

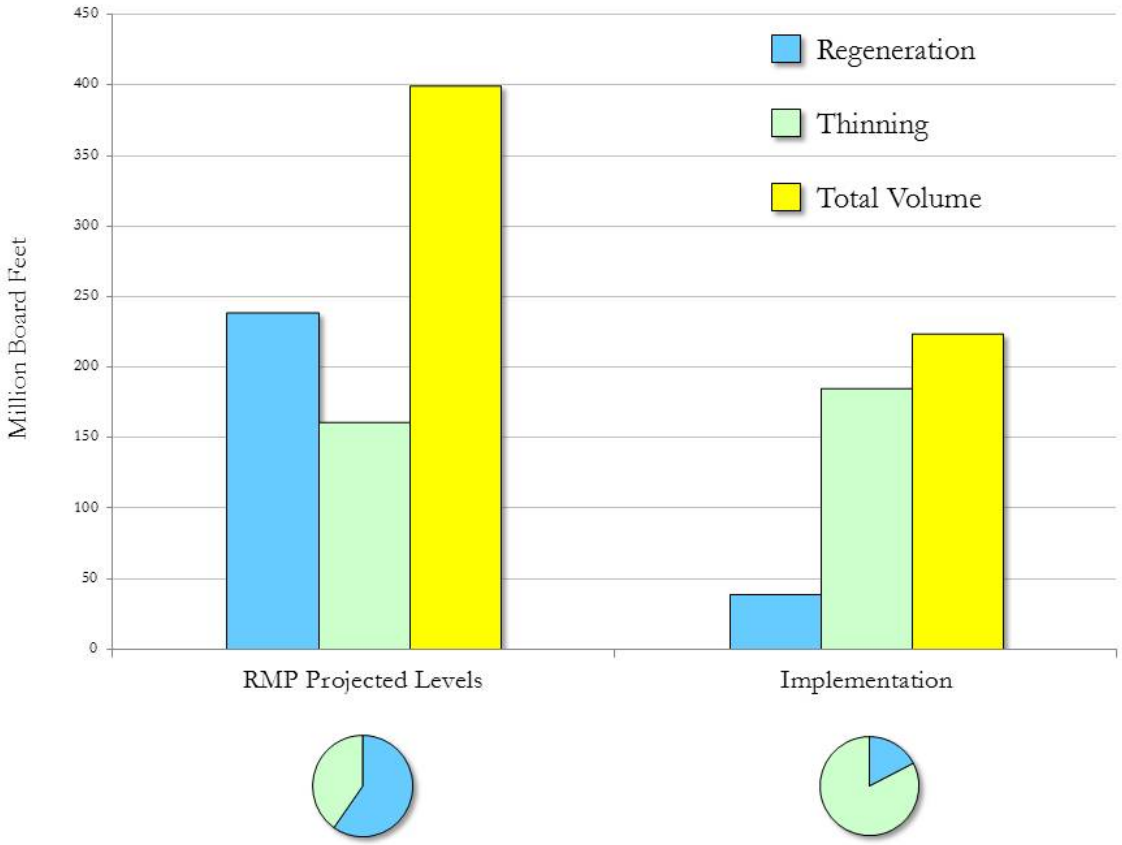


- The ASQ was generally achieved during the early years of the RMP with the anticipated ramp-up period.
- Since 1998 the ASQ has not been achieved for ten years. It was exceed in two years.
- Evaluation period
    - Sold volume averaged approximately 32 million board feet annually.
    - Sold volume was 56% of the ASQ.

Figure 5 – Total ASQ Volume – Evaluation Period - Projected and Implementation.

Left bars and pie - RMP projected assumed levels for the evaluation period.

Right bars and pie - Implementation - timber sales sold during the evaluation period.

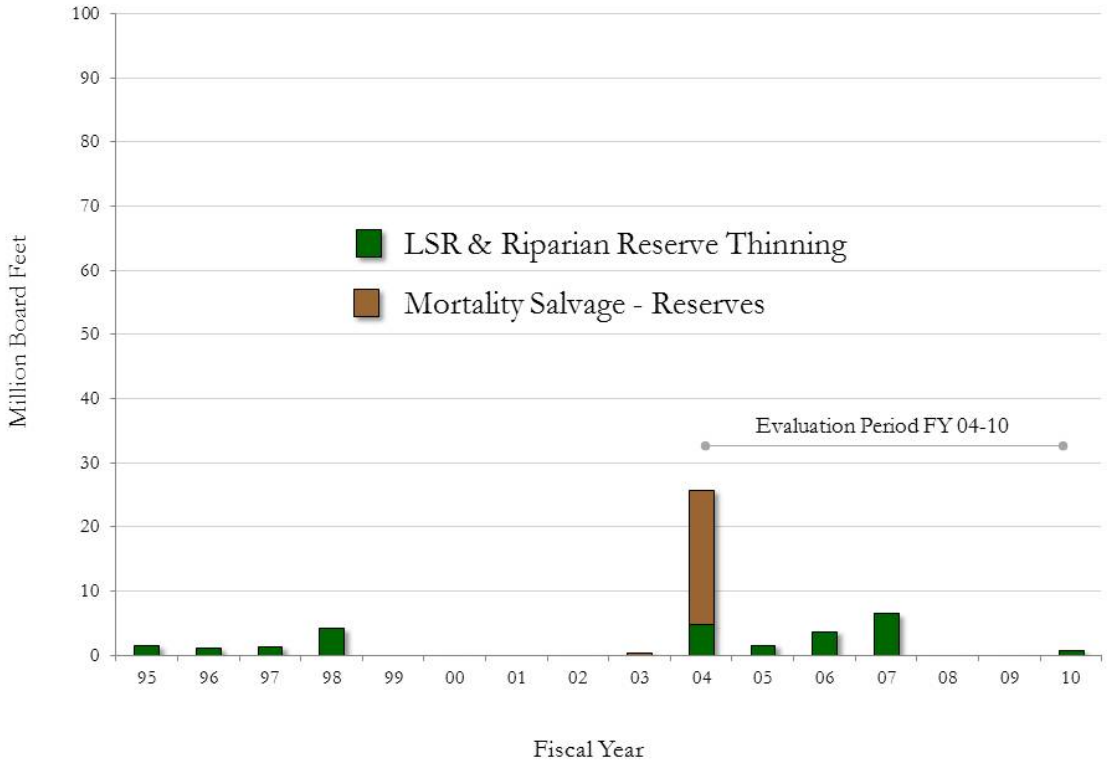


- Evaluation Period
  - Total sold volume was 56% of the RMP projected level.
  - Regeneration volume was 16% of the RMP projected level.
  - Thinning volume was 115% of the RMP projected level.
  - The RMP assumed that 60% of the volume would be from regeneration and 40% from thinning (left pie).
  - Sold sales were 17% regeneration and 83% thinning (right pie).

2) Non-ASQ - Reserve Volume

Harvest is allowed, for reserve land objectives, within LSR and Riparian Reserves. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the reserve allocations. Mortality salvage in LSR results from episodic natural disturbance events. Harvest from reserves does not contribute to the ASQ because it is not planned to be repeated over the long term and thus is not a sustainable source of volume.

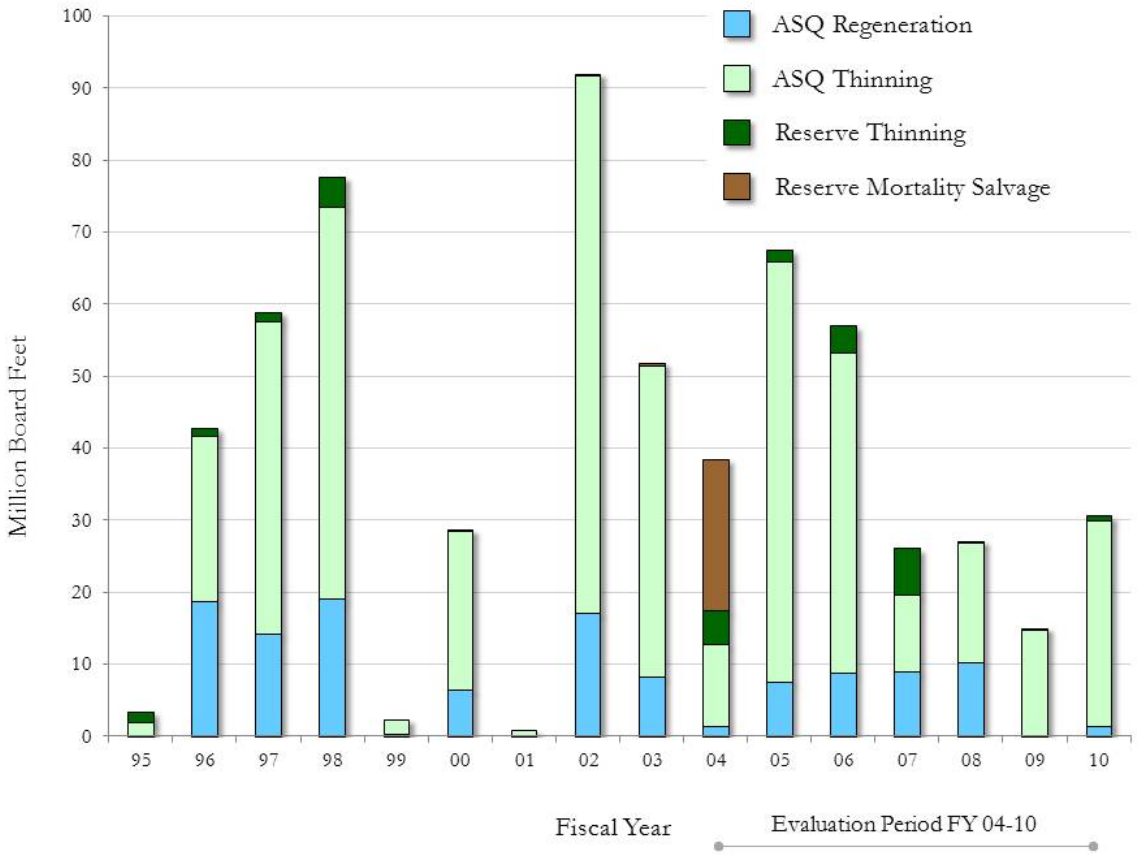
Figure 6 – Reserve Volume by Fiscal Year



- Evaluation Period
  - Total sale volume from reserves averaged 5.5 million board feet annually.
  - Approximately 17 million board feet was sold from LSR and riparian reserves.
  - Approximately 21 million board feet was sold from mortality salvage in LSR (Timbered Rock, 17mmbf; Biscuit fire, 4 mmbf) in fiscal year 2004. Absent of this stochastic event, reserve thinning volume averaged 2.5 million board feet annually.

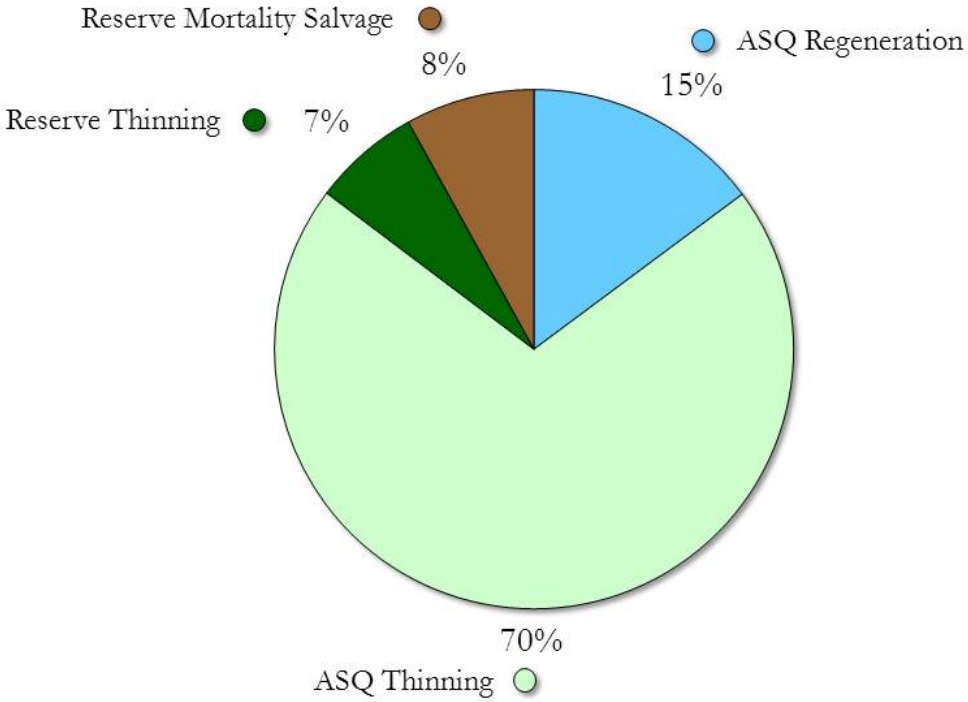
3) Total Volume - ASQ and Reserves

Figure 7 – Total Volume ASQ and Reserves



- Evaluation Period
    - Total volume sold averaged approximately 37 million board feet annually.
    - ASQ volume sold averaged slightly under 32 million board feet annually.
    - Reserve volume sold averaged approximately 5.5 million board feet annually.

Figure 8 – Total Volume - ASQ and Reserves – Evaluation Period



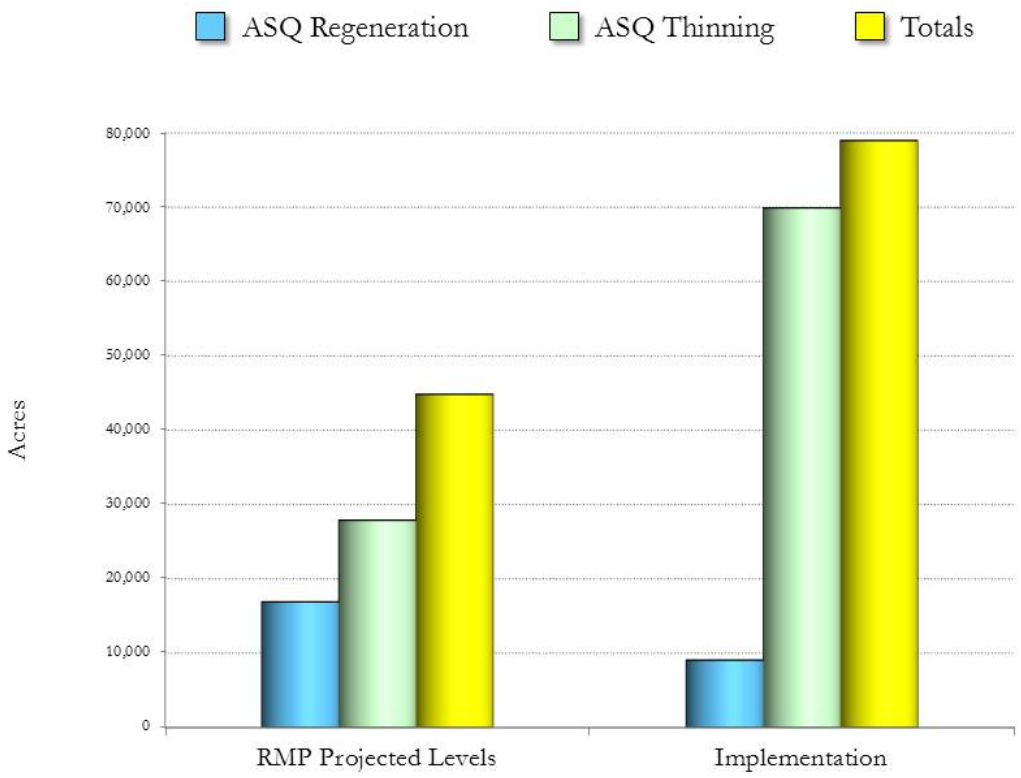
- Evaluation Period
  - 262 million board feet were sold during the evaluation period
  - ASQ contributed 85% of the total volume sold, 223 million board feet.
  - Reserves contributed 15% of the total volume sold, 39 million board feet.

4) ASQ Acres – Projected and Implementation

Figure 9 – Total Timber Sale Acres – Harvest Land Base - ASQ

Left bars - RMP projected assumed levels for FY1995-2010.

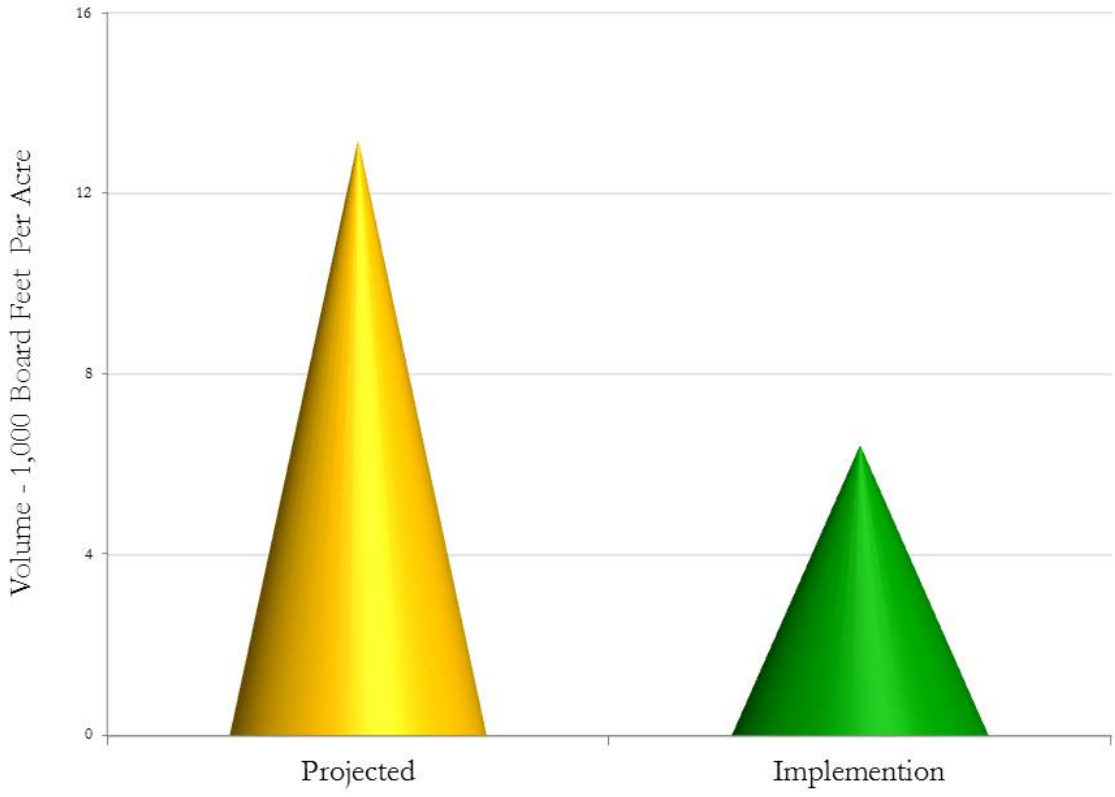
Right bars - Implementation of timber sales sold for FY 1995-2010.



- Fiscal Years 1995 – 2010
  - Regeneration sale acreage was 54% of the RMP projected level.
  - Regeneration sale acreage of stands 150 years and older were 49% of the RMP projected level (not displayed in the graphic).
  - Thinning sale acreage was 251% of the RMP projected level.
  - Total sale acreage was 176% of the RMP projected level.

5) ASQ Thinning Volume Per Acre – Projected and Implementation

Figure 10 – Projected Volume Per Acre and Implementation Fiscal Years 1995 - 2010.



- Fiscal Years 1995 – 2010

    - The determination of the ASQ assumed an average of approximately 13 thousand board feet would be harvested per acre with thinning harvest.

    - Over the life of the plan thinning sales have averaged slightly over 6 thousand board feet per acre.

    - The ASQ thinning volume per acre was 49% of the RMP projected level.

6) Changed Circumstances and New Information

- In 2008, the U.S. Fish and Wildlife Service designated new critical habitat for the northern spotted owl. This designation precludes sustained-yield timber management on specified acres and has reduced the land available for harvest by approximately 12% from what was assumed by the 1995 RMP determination of the ASQ.

- The BLM has generally avoided timber sales within the home ranges of known or predicted spotted owl sites to minimize effects on spotted owls and owl habitat. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Management of Survey and Manage sites in the harvest land base was not considered in the determination of the ASQ. As sales are designed and sites are identified, acres are reserved from harvest units. The BLM has also been avoiding timber harvest on lands in the harvest land base which are likely to have occurrences of survey and manage species, because of the necessary investment in surveys and resulting effects of species occurrence on sale viability. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Anticipation of protests and appeals has caused the BLM to avoid regeneration harvest, especially regeneration harvest of older forest. This has implications for the sustainability of timber harvest, and has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Protests and appeals have also been received on thinning and stewardship projects which has also resulted in delays or cancellation of awarded sales.

- The Cascade-Siskiyou National Monument RMP superseded the Medford District RMP and has slightly reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- The need for forest health treatments to improve resiliency in dry-forest landscapes and reduce fuel hazards in the wildland-urban interface has led to higher level of thinning treatments than anticipated by the 1995 RMP and determination of the ASQ.

- The 2008 FEIS evaluated the volume potential for managing 146,000 acres of the district under an uneven age management approach (2008 RMP) which indicated a sustainable harvest level of 28 million board feet. The uneven age approach analyzed relies on a variety of density management treatment with patch openings. The uneven age management approach had both timber and improvement of forest resiliency as objectives.

- The 2008 FEIS evaluated the volume potential utilizing current inventory and improved mapped data on allocations. The 2008 FEIS analysis of continued implementation of the 1995 RMP (i.e., the No Action alternative in the 2008 FEIS) indicated the sustainable harvest level for the Medford District would be 59 million board feet. The 2008 FEIS analysis of continued implementation of the 1995 RMP indicated that there would be a potential non-ASQ harvest of 3 million board feet volume from reserves for the next 20 years.

Medford District BLM Resource Management Plan Evaluation

5.0 Planning and Environmental Findings by Related Program/Resource Groups

5.1 Overview of Major Land Use Allocations, Progress on Watershed Analyses, Late-Successional Reserves, and Applicable Adaptive Management Areas (AMAs)

5.1.1 Major Land Use Allocations

The Cascade-Siskiyou National Monument RMP superseded the Medford District RMP; these updates in land use allocation need to be reflected in any future RMP revision.

Spotted Owl 100 acre cores are not all 100 acres. It would be good to allow for minor changes in boundaries, within certain restrictions, to attain management objectives

5.1.2 Progress of Watershed Analyses

Watershed analyses. Watershed analyses have been completed for 93 percent of the district; thirty-eight first iterations and four second iterations. Watershed analyses have not been completed for three Level 5 watersheds (Shady Cove-Rogue River, Cottonwood Creek, and Beaver Creek), half of a Level 5 watershed (north half of Gold Hill-Rogue River), and a Level 6 subwatershed (Pleasant Creek in the Evans Creek Watershed).

5.2 Timber Management and Silvicultural Practices

5.2.1 Timber Management

- Regeneration Harvest: Volume sold is **31** percent of the projected volume over 15 years of plan implementation. Acres covered **78** percent of the projected land base over the 15 years of the plan.
- Commercial Thinning/Density Management: Volume sold is **121** percent of the projected volume over 15 years of plan implementation. Acres covered **235** percent of the projected land base over the 15 years of the plan.

The present numbers of RMP regeneration harvest volume, from ROD signing in 1995 through FY 2010, are currently running 30% of projections. Up until the wind-throw event of 2008 the numbers were even more below projections. The volume of regeneration harvests have also been significantly under the projected values through the 15 years of plan implementation; this is regardless of other stochastic events like fire and wind-throw, and this lends to the per acre volumes being under as well. Coding of wind-throw and fire salvage volume as regeneration harvest overstates regeneration acres. Further analysis may be able to explain the disparity, however many factors are involved in unit choice and complicate the situation.

The volume and acres of commercial thinning and density management is significantly above that projected for the 15-year period, likely due to the need to address forest health issues in a dry-forest landscape; fuel hazard reduction, particularly in the Wildland-Urban Interface (WUI); and forest restoration in mixed-conifer and mixed conifer/hardwood forested stands.

Because of the dry-forest, fire-adapted ecosystem of southwestern Oregon, an integrated vegetation management approach should be assessed to address issues around managing fuels in the WUI, and the related need for restoration and forest health treatments to develop functional, diverse and sustainable forest conditions that are resilient to disturbances and long-term climate trends.

The data shows a high number of acres harvested for regeneration within the younger age classes below 100 years old. The presence of two large scale disturbances in the form fire and wind throw may explain most of the acreage increases in the younger age class range; however, more factors are likely to be affecting this situation. Other factors could include misclassification of the age of stands, such as in conditions where there are legacy components in a stand with a younger cohort that would have occurred under a shelterwood or overstory removal prescription.

Density Management Harvest and Other Type Thinning are significantly above projected acres and also in volume and per acre volume estimates. As with the explanation given for regeneration harvests, further analysis may be able to explain the disparity, but many factors are involved in unit choice and complicate the situation.

5.2.2 Silvicultural Practices

Actions anticipated for the silviculture program and outlined in the RMP are being implemented, but at lower levels than projected in some cases. Planting with genetically selected seed has increased over the previous decade but has not reached the decadal projection. Planting with regular stock has exceeded the decadal projection. Precommercial thinning and planting are less than the decadal projections because of reduced harvest. Fires and other disturbances have created new cohorts of young stands but much of this acreage, though not all is in reserves.

Table V-1-B, Medford District Silvicultural Practices

Practice	Treatment Type	Treated Acreage 1995-2003	Projected Decadal Accomplishment Acres 1995-2005	Percent of First Decadal Projected Acreage Accomplished	Treated Acreage 2006-2010
Fuel Treatments	Prescribed Burning	41,285	24,000	172 %	984
Maintenance / Protection	Maintenance	43,089	25,000	172 %	11,500
PCT	PCT	31,552	78,000	40.5%	6985
Release	Release	N/A*	N/A*	N/A*	14,952
Stand Conversion	Hardwood Conversion	0	N / A	N / A	0
Plant Regular Stock	Planting Regular	11,226	2,700	415 %	3128
Plant Genetic Stock	Planting Genetic	3,087	10,300	30.0 %	3045
Fertilization	Fertilization	2,222	57,000	3.9 %	0
Pruning	Wood quality/Other	6,005	18,600	32.3 %	3028

*****Release Acres not tracked in RMP

Maintenance/Protection

No changes in conclusions.

Release/PCT

- Medford District has currently identified 13,840 acres in need of PCT and release and anticipates a moderately high PCT/Release workload for at least another 10-20 years. Stands created through disturbance will need to be treated.

- Additional PCT treatments of stands thinned to variable spacing in reserves may be needed to keep these stands on a trajectory to develop the structural characteristics thought to be important to later seral stage species.

- Release treatments on the District are defined as removing hardwoods to release conifers. PCT generally refers to density management of conifers.

Intermediate Stand Treatments

- Intermediate Stand Treatments will be needed for stands that are overstocked because they were not treated at the appropriate time for PCT. Failure to treat stands on low productivity sites means it will be decades before a commercial product will be available except for very small diameter material. There are approximately 17,000 acres in need of treatment. About 6,000 acres in LSR are in need of treatment to accelerate late-successional conditions.

Plant Regular Stock

- Medford District has increased the amount of genetically improved stock that is planted to about a 50/50 mix, an improvement from the last decade and this trend should increase.
- Planting of regular stock continues to take place but this is mainly for non-improved species such as ponderosa pine, incense cedar and sugar pine.

- Planting will continue even with reduced regeneration harvest because of fires and other disturbances such as blowdown.

- However, due to less acres of regeneration harvest, there have been fewer acres to plant.

Plant Genetic Stock

- Expectations are that up to 70% of the trees planted that will come from genetically improved stock. The other 30% will be non-improved species such as ponderosa pine.

Fertilization

No changes in conclusions.

Pruning

- The Medford District RMP included projected accomplishment acres for pruning for improvement of wood quality.

- Pruning for wood quality has not met decadal projections on Matrix lands because of a lack of funds and regeneration harvest. Pruning for wood quality and forest health such as pruning sugar pines for blister pine rust prevention has been accomplishment on 3,045 acres since 2004.

There are some new data or analyses that could affect the long term planning management direction and decisions. The analysis in the Western Oregon Plan Revision recommended using uneven-aged management for fire resiliency on some matrix lands. This would result in fewer even-aged silviculture prescriptions and more intermediate stand treatments. In terms of silviculture practices, there would less brushing, maintenance and release.

Actions anticipated for the silviculture program and outlined in the RMP are being implemented, but at lower levels than projected in some cases. Planting with genetically selected seed has increased over the previous decade but has not reached the decadal projection. However, planting with regular stock has exceeded the decadal projection. Precommercial thinning and planting are less than the decadal projections because of reduced harvest. Fires and other disturbances have created new cohorts of young stands but much of this acreage, though not all, is in reserves.

5.3 Special Forest Products (SFPs)

No changes in conclusions.

5.4 Soils and Hydrology

Objectives and specific management actions/direction for the Water and Soil programs are found in the Medford District ROD/RMP on pages 41-44 and in Appendices A and D. Program review for implementation of management actions/direction outlined in the RMP is described below.

Riparian Reserves. The District is implementing the interim Riparian Reserve widths and has not made any boundary adjustments. Management actions within the reserves include precommercial thinning, fuels treatment, and density management. The Aquatic Conservation Strategy Standards and Guidelines are used in designing management prescriptions within Riparian Reserves.

Key watersheds. Watershed restoration was a priority for Key Watersheds during the first decade of RMP implementation; however, restoration funding has declined over the past five years.

Watershed restoration. Restoration work has primarily consisted of road decommissioning, road renovation to improve drainage and reduce erosion, culvert upgrades for fish passage and accommodating 100-year floods, riparian area fencing, and large wood and boulder placement in streams for fish habitat. Starting in 2005 there has been a dramatic decline in watershed restoration funds and fewer projects are being implemented. Decreased revenue from timber sales in recent years has resulted in fewer road miles improved and decommissioned under timber sale contracts.

Water quality limited streams. The number of streams on the 303(d) list has increased since the plan was completed. Starting with the 1994/1996 303(d) list, the Oregon Department of Environmental Quality (DEQ) began actively soliciting Federal agencies for water quality data. In 1994, the Medford District began collecting continuous stream temperature data; and the submission of this data to the DEQ resulted in many streams being added to the 303(d) list.

Best Management Practices. Best Management Practices (BMPs) for water quality and soil productivity have been incorporated as project design features in Categorical Exclusions (CEs),

Environmental Assessments (EAs) and EISs. Implementation monitoring documented in the Annual Program Summaries indicates that most BMPs have been implemented according to the CEs, EAs and the RMP.

Watershed deferrals designated because of high watershed cumulative effects. Instruction Memorandum No. OR-110-2006-024 was issued by the Medford District Manager on Sept. 21, 2006 to provide a process for reevaluating watershed deferral areas. Reevaluations will be completed during NEPA analysis for projects proposed within the deferral areas. Seven of the 22 deferral areas were reevaluated through FY 2010. The recommendation for five of the reevaluated deferral areas was to maintain deferral status due to wildfires. The other two reevaluations recommended the areas be removed from deferral status with special management practices and this was approved through a RMP maintenance action.

Watershed deferrals designated as watershed monitoring areas. A fuels reduction project occurred in one deferred monitoring area (Upper Morine Creek), but no management activities have occurred in the other three deferred monitoring areas.

Apply for water rights. Water rights have been obtained from the Oregon Water Resources Department as needed for road operations, prescribed burning, grazing, recreation, and wildlife.

Use land acquisition, exchange, and conservation easements to meet Aquatic Conservation Strategy and Riparian Reserve objectives. The District has acquired property within the Cascade Siskiyou National Monument and the Riparian Reserves are managed in accordance with the Aquatic Conservation Strategy.

The Riparian Reserve allocations, deferred watershed constraints, Aquatic Conservation Strategy, and BMPs afford the necessary tools to provide resource protection for proposed management activities. The *NWFP Temperature Implementation Strategy* should be incorporated in the RMP to guide management activities adjacent to streams that are water quality limited for temperature. Long-term monitoring of water quality, riparian vegetation, stream channel conditions, and soil productivity are necessary to measure the effectiveness in achieving desired outcomes. Soil productivity is not being monitored and BMP implementation and effectiveness monitoring is limited.

The Medford District BLM submitted Water Quality Restoration Plans (WQRPs) to DEQ for incorporation in the WQMPs. The WQRPs address TMDL implementation for 303(d) listed streams on BLM-administered lands. The TMDLs and WQRPs need to be incorporated in the RMP. The most recent temperature TMDLs issued by the DEQ require the same level of shade protection for intermittent streams as for perennials. This will likely affect the BLM's ability to prescribe vegetation and fuel reduction treatments within Riparian Reserves. The one sedimentation TMDL within the Medford District requires reductions in road density and road-stream crossings.

Decisions made in the early years of the plan are generally still correct and proper over time; however, several issues currently affecting water quality and soil productivity were not addressed in the RMP.

New types of ground-based harvest, biomass removal, and slash-reduction equipment have been introduced since the RMP was completed. The impacts of this equipment on long-term soil

productivity, soil compaction, and hydrologic function, and associated BMPs should be assessed in future RMP revisions.

The RMP tiers to the 1985 Medford Grazing Management FEIS. A reassessment of riparian and water quality impacts from livestock grazing should be completed in any RMP revision.

The RMP does not address issues regarding increased illegal off-highway vehicle (OHV). The increasing level of unauthorized OHV use and resulting impacts on soil and water quality were not foreseen or analyzed by the RMP. Riparian and water quality impacts from this illegal use are expanding and can exceed impacts that occur as a result of other management activities.

Ongoing on-the-ground inventory of streams and riparian areas is integral to prescribing appropriate Riparian Reserve widths and BMPs for project implementation. Although a substantial amount of stream miles have been inventoried, over 50% of the District's stream miles still need to be inventoried. Information collected during stream/riparian inventories needs to be entered into the BLM corporate databases for use in NEPA analysis. Adequate funding is critical for the continuation of stream/riparian inventories and database management.

5.5 Wildlife, Fisheries, and Special Status Species

5.5.1 Wildlife

The Cascade Siskiyou National Monument (CSNM) has its own management plan, signed in 2008 implementing the June 9, 2000 Proclamation. Acres, and management actions for the area now in the CSNM are no longer valid in the RMP.

Use of the Elk Model was modified from our Medford RMP in 2010 but the modification still references future versions of the model. The criteria for the elk model cannot be met on BLM lands since we cannot control private road densities or maintain forage areas for the timelines suggested in the model and still remain consistent with other objectives. Poor nutrition is an issue for big game, particularly elk reproduction, and has been raised as an issue by ODFW.

Snag/down wood models should be assessed for their adequacy to meet the objectives identified in any RMP revision.

The RMP should be updated to address newer threats and methods for diseases and invasive species control. Examples include SOD, deer hair loss syndrome (thought to be caused by non-native lice), and WNS (white nose syndrome) (see bat section below).

The special status species list in the RMP (Table C-1) is outdated.

Bald eagles and peregrine falcons should comply with delisting guidance as special status species, and not as listed species as mentioned in the RMP.

Years of protocol surveys for marbled murrelets suggest that they do not occur in Medford BLM. Need to re-evaluate the need to keep them on our SSS list and drop the requirement to survey potential habitat. Initiated discussions with USFWS to re-evaluate MAMU distribution on Medford, but workload prevents further analysis.

DISTRICT NUMBERS*

Total # of MAMU Survey Sites = ~ 500
Total # of MAMU Stations = ~ 2030
Total # of Surveys of those Stations = ~3200
Total Acres Surveyed = ~ 39000

*Estimated acres were calculated by averaging how many acres the average Survey Site contains and then multiplying that by the total number of sites. (Steve Haney, WL Data Steward, 3/2/2011).

New candidate species have been warranted for listing but precluded since 2004:

Pacific fisher-Populations should reflect the Fisher Conservation Assessment and management should follow the draft Fisher conservation strategy.

Mardon Skipper – Conservation Assessment has been completed (2007) and updated (2011) with management plans prepared for Medford District sites in 2010 (Black et al. 2010).

Siskiyou Mountain Salamander has a signed Conservation Strategy (2007). Revise RMP to incorporate the Strategy.

Northern Spotted Owl

Spotted owl objectives should be reassessed in light of current management and consultation guidelines. Baseline habitat evaluation for owls needs to be updated. Owl estimates probably over-estimate the number of owls on the Medford District. Most owl sites in the District have not had protocol surveys since the early 90's (see demographic bullet below). Habitat layers need to be assessed for adequacy for any future RMP revision. The LSR allocation in Medford fails to protect most known owl sites. RMP guidelines for owls in the Medford District do not reflect the importance of SW Oregon owls in maintenance and recovery of the species.

- 19% of the estimated 550 historic owl sites (some of these are alternate nest sites) in the Medford District are protected by LSR (or AMR), and 21% are protected by CHU.
- Medford shares a portion of one demographic study area with Roseburg. Most other Districts have several demographic study areas, cooperative agreements with state or private partners to survey owls or both. Medford has the second most number of owls (second only to Roseburg) and has the fewest owl sites in protocol survey areas.
- Spotted owl management guidelines in the RMP do not reflect barred owl impacts and need to incorporate guidance for thinning and fuels treatments in or near owl sites.

Townsend's big-eared bats (and all cave-dwelling bats): White nose syndrome threatens bats across North America and guidance on this and other emerging or potential diseases should be incorporated into any RMP revision. Medford has approximately 1,400 mine adits and several natural caves, most of which support some degree of bat use. Recent AML guidance to close adits that have unlikely bat use should be continued. Adits that have known bat use should be gated and surveys should be conducted for bats in the event that closure is necessary for safety purposes where bat use in not confirmed.

The District participates in a variety of cooperative efforts to monitor and manage wildlife with state and federal agencies, nongovernmental organizations, and private companies.

5.5.3 Fish Including Special Status Species

Actions outlined for fish habitat management in the plan are being implemented as defined in the ROD.

Determination of viable populations is complex, and too costly to be practicable. The primary objective is to manage Federally listed species' connectivity and their habitats to achieve recovery. The District has implemented numerous actions to improve habitat conditions and riparian areas, and is moving in a positive direction to meet its role in recovery.
Based on available information, the allocations, constraints, and mitigation measures are effective in achieving the desired outcomes for specific projects and stream reaches.

5.6 Air Quality, Fire and Fuels Management, and the Wildland-Urban Interface (WUI)

5.6.1 Air Quality

Greenhouse gases and associated climate change need to be addressed on a regional scale.

Changes in carbon storage due to forest management activities need to be analyzed at the local and regional level along with development of a method for measuring and tracking the changes.

Air quality and effects of burning plastic both on human health and GHG emissions need to be addressed in any future RMP revision.

5.6.2 Fire and Fuels Management and the Wildland-Urban Interface

No changes in conclusions.

5.7 Lands and Realty, Rights-of-Way and Utility Corridors and Communication Sites, Withdrawals and Classifications, Access, Roads and Engineering, Renewable Energy, and Adverse Energy Impact Assessments

5.7.1 Lands and Realty, Rights-of-Way and Utility Corridors and Communication Sites, and Withdrawals and Classifications

Acquisitions (ROD/RMP, page 81). There are 12 active or requested Land and Water Conservation Fund acquisitions totaling approximately 15,000 acres within the Cascade-Siskiyou National Monument and one land donation for 140 acres at this time. Acquisitions are more likely in Land Tenure Zone 1 areas, especially the Cascade-Siskiyou National Monument and the designated Rogue Wild and Scenic River corridor. The ongoing National Monument planning effort will identify potential opportunities for inholding acquisitions within that area.

Land Exchanges (ROD/RMP, page 81). There are two Congressional land exchanges being processed at this time within the Cascade-Siskiyou National Monument.

Land Sales (ROD/RMP, page 81). An assessment should be made on potential for assignment of lands with encroachments to Zone 3, providing an additional management option for these lands.

Rights-of-Way and Utility Corridors and Communication Sites (ROD/RMP, page 82).

No Changes in conclusions or narrative.

Withdrawals and Classifications (ROD/RMP, page 84).

No Changes in conclusions or narrative.

5.7.2 Access

No Changes in conclusions or narrative.

5.7.3 Roads and Engineering

1) The Western Oregon Districts Transportation Management Plan (TMP) was in final draft at the end of FY 2010 (signed in 2011).
2) RMP refers to Facility Inventory Maintenance Management System. This is no longer in use. The current system is Facility Asset Management System (FAMS). FAMS does link to the Ground Transportation database (GTRN) through a protocol of daily updates.
3) The TMP establishes the desired outcomes in the form of sixteen goals now instead of the former five. All goals still address the desired outcomes of providing access to public lands for forest management and recreation purposes, while preserving or improving air quality and water quality objectives, soil productivity, and fish and wildlife habitat; conserving special status plant and fungi species; and maintaining or restoring natural plant communities on non-forest and non-commercial lands.
4) The roads database has been updated since the last plan revision. Baseline road condition assessments have been conducted for all but a minor portion of the higher maintenance intensity roads, and the remainder will be completed this year.
5) Funding for maintaining the District's buildings and roads continues to lag well below the maintenance needs and the backlog of deferred maintenance projects continues to grow every year. The American Recovery and Reinvestment Act of 2008 (ARRA) was beneficial to the Districts and allowed some backlog projects to be accomplished.

5.7.4 Renewable Energy and Adverse Energy Impact Assessments

No Changes in conclusions or narrative.

5.7.5 Abandoned Mine Lands

Abandoned Mine Lands were minimally addressed in the RMP under Rural Interface Areas. Area of consideration should be expanded outside this area. Consistency with other plans (e.g., Jacksonville Woodlands) and BLM policy may make remediation difficult.

5.8 Recreation Resources and Off-Highway Vehicles, and Visual Resources

5.8.1 Recreation Resources

Recreation management as per the RMP is, for the most part, being implemented, and a diverse range of outdoor activities is provided to the public.

Existing Recreation Opportunities

Developed opportunities (campground use, day-use, boat ramps, etc.) are meeting current demand. Dispersed recreation activities (backpacking, rafting, hunting, etc.) continue to

fluctuate relative to local population growth, the economy, and developments in recreation equipment and technology. A significant increase in off-highway vehicle (OHV) use and mountain bike use has occurred and the existing opportunities have not kept up with demand. Other trail opportunities are being managed and some new trail opportunities have been developed based on demand and community support. Several watchable wildlife sites have been developed. Existing Back Country Byways are being managed. Existing SRMAs and ERMAs are also being managed in accordance with the ROD/RMP and subsequent activity level plans.

Potential/New Recreation Opportunities

The recreation opportunities that have not been implemented include several potential developed sites and trails, and new SRMAs and backcountry byways. In some cases, available funding and new management emphasis have constrained the development of the new opportunities. In other cases, changing priorities, changing public use patterns and/or demand have eliminated developing the opportunity entirely. Access issues, and wildlife and other resource issues have also inhibited development of some sites.

Sites that have been developed that are not in the RMP have been developed to deal with unmanaged recreation use in areas, and public and partner pressure due to increasing population.

Off Highway Vehicle Opportunities

Although lands have been designated as open, limited, or closed for OHV use, the majority of the lands are "open" and the "limited" designations have not been implemented, which creates management challenges. Three areas were identified to be managed to provide for OHV use, Timber Mountain, Quartz Creek and Ferris Gulch. Two of these areas are currently in the planning process. A Draft EIS for the Timber Mountain OHV Area was released in 2009. Continuation of the planning process is encumbered by competing priorities and funding constraints. Quartz Creek OHV area is currently in the NEPA phase with an EA currently in the works. A third OHV area, (Ferris Gulch) will not be managed for OHV use due to the lack of sustainable routes and mileage on BLM land to provide a quality OHV experience. A comprehensive OHV route inventory project that began in 2006 has identified other high-use concentrated OHV areas that could be managed for such uses.

Unmet Needs

There are unmet needs that are not addressed in the ROD/RMP.

- Additional SRMAs managed for environmental education, off-highway vehicle use, mountain bike and/or equestrian use;
- Areas identified with broad management direction for special recreation permit activities such as large group events or filming opportunities;
- Objectives or management actions identified for special recreation permit issuance in the ROD/RMP.
- Use of firearms in and around the Wildland-Urban Interface, recreational sites, wild and scenic river corridors and other similar areas is not addressed in the current RMP.

Changes to Policy

There have been several changes for recreation resources in relation to law, policy, new statutes, proclamations, Executive orders, etc. that may or may not need to be addressed in the ROD/RMP.

- Presidential Proclamation 7318 (June 9, 2000) established the Cascade-Siskiyou National Monument (CSNM) which included the Soda Mountain WSA. A separate ROD/RMP was implemented for CSNM in August, 2008. Further discussion of CSNM can be found in section 5.8.3 NLCS.
- The Federal Lands Recreation Enhancement Act (REA) was passed in the 2005 Consolidated Appropriations Act (PL 108-447) signed into law on December 8, 2004. The 10-year Act authorizes the Secretaries of the Interior and Agriculture to establish, modify, charge and collect recreation fees at Federal recreation lands and waters as provided for in the Act. The current ROD/RMP is silent about recreation fees including some of the mandates required in the law (e.g. fee reporting, business plans, etc.).
- BLM's H-1601-1 Land Use Planning Handbook was revised in March of 2005 adding two additional requirements in relation to recreation resources. The first is in relation to Comprehensive Travel and Transportation Management. The new direction requires the establishment of travel management areas (TMAs) designed to address all resource use aspects (such as recreational, traditional, casual, agricultural, commercial, and educational) and accompanying modes and conditions of travel on the public lands, not just motorized or off-highway vehicle activities. The second is the identification of management goals and/or objectives for interpretation and environmental education, and the identification of significant resources or areas that will be made available for interpretation/environmental education. The current ROD/RMP is silent about interpretation and environmental education.
- The Recreation and Visitors Services guidance in Appendix C of the BLM's H-1601-1 Land Use Planning Handbook was revised in October of 2010 (WO-IM-2011-004) requiring the establishment of a three-tier classification for lands used and managed for recreation. This new classification replaces the existing 30-year-old, two-tier system where all lands were classified as either special or extensive recreation management areas.
- BLM's H-2930-1 Recreation Permit Administration Handbook was revised in 2006 reflecting changes adopted in REA and the Federal Register Notice for 43 CFR 2930 published in October of 2002. New guidance for permit fees and commercial recreation filming on BLM lands was added. The current ROD/RMP is silent about special recreation permits.

5.8.2 Visual Resources

The ROD/RMP establishes objectives and management actions for visual resources.

The written description of the VRM Class II land allocation on page 70 of the RMP/ROD is not consistent with the map. In the written description, the seen area from the recreation section of the Rogue River was left out of VRM II description. The map, however, includes the seen area from the recreation section of the Rogue River. This inconsistency has not been clarified.

VRM guidance for CSNM and Soda Mountain Wilderness can be found in the 2008 Cascade-Siskiyou National Monument ROD/RMP.

There is a potential need to conduct new inventories on visual resources pursuant to BLM's responsibility to maintain inventories on a continuous basis if a plan revision occurs. This need is based on identifying the aggregation of change to the original inventories from implemented management actions since 1995.

There have been some changes for visual resources in relation to law, policy, new statutes, proclamations, Executive orders, etc. that may or may not need to be addressed in an RMP revision:

- The mandatory use of VRM Class I in wilderness study areas was clarified in BLM's H-8410-1 Visual Resource Inventory Handbook by WO-IM-2000-096 that requires Wilderness Study Areas be managed under VRM Class I Objectives. The change in acres or mapping has not occurred in the 1995 ROD/RMP.
- Presidential Proclamation 7318 (June 9, 2000) established the Cascade-Siskiyou National Monument (CSNM) which included the Soda Mountain WSA. A separate ROD/RMP was implemented for CSNM in August, 2008. The change in acres or mapping excluding CSNM for visual resources has not occurred in the 1995 ROD/RMP. Further discussion of CSNM can be found in section 5.8.3 NLCS.

5.8.3 NLCS

There are four NLCS components represented on the Medford District including wild and scenic rivers (Rogue National Wild and Scenic River); national monuments (Cascade-Siskiyou National Monument); wilderness (Wild Rogue Wilderness, and Soda Mountain Wilderness); and national historic or scenic trails (Pacific Crest National Scenic Trail, Applegate Branch of the California Historic Trail, and the California/Oregon Wagon Historic Trail). Wild and scenic river management is discussed on pages 68 and 69, and the Pacific Crest Trail on page 70. No mention of potential monuments or the historic trails are found in the ROD/RMP.

Also discussed in this section, though not considered NLCS components, are eligible/suitable wild and scenic rivers; wilderness study areas; instant study areas; and lands with wilderness characteristics.

Wild and Scenic Rivers

The ROD/RMP identifies objectives and management actions for the Rogue National Wild and Scenic River. Other specific management direction for the river corridor is included in the 1972 Interagency Notice of Revised Development and Management Plans (FR Vol. 37, No. 31), and the 2004 Hellgate Recreation Area Management Plan. The majority of management actions from all three plans have been implemented. One management action in the ROD/RMP that has not been implemented due to budget constraints is the revision of the 1972 plan.

National Monuments

Goals, objectives and management actions for the Cascade-Siskiyou National Monument (CSNM) are in its 2008 Record of Decision/Resource Management Plan. Additionally, under

the direction of the CSNM plan, the district is currently developing a wilderness plan for Soda Mountain.

Wilderness

The Wild Rogue Wilderness was established in 1978 (PL 95-237) and is primarily on National Forest System lands, but does include some lands administered by BLM. However, language in the 1978 Endangered Wilderness Act that designated the Wild Rogue, administration of the wilderness was granted to the forest service. All management direction for the entire wilderness is covered under the 1989 Siskiyou National Forest RMP. No mention of this relinquishment of responsibility is mentioned in the ROD/RMP.

National or Historic or Scenic Trails

The ROD/RMP relies on the Pacific Crest National Scenic Trail Comprehensive Plan (USDA-USFS, 1982) for management direction of the trail. Additional direction for the portions of the trail traversing through CSNM can be found in its 2008 plan.

Though historic trails are not addressed in the ROD/RMP, management direction for those trails can be found in the 1999 Comprehensive Management and Use Plan for the California, Pony Express, Oregon, and Mormon Pioneer National Historic Trails (USDI-NPS).

Changes to Policy

There has been one major change for the NLCS components in relation to law, policy, new statutes, proclamations, Executive orders, etc. that may or may not need to be addressed in the ROD/RMP. Presidential Proclamation 7318 (June 9, 2000) established the Cascade-Siskiyou National Monument (CSNM) which included the Soda Mountain WSA. A separate ROD/RMP was implemented for CSNM in August, 2008. The change in acres or mapping excluding CSNM has not occurred in the 1995 ROD/RMP.

5.8.4 Potential WSRs, Wilderness Study Areas, and Lands with Wilderness Character

Eligible and suitable wild and scenic river segments are addressed in the ROD/RMP on page 69, and wilderness study areas on page 71. There is no mention of lands with wilderness characteristics.

Eligible/Suitable River Segments

A total of 60 river segments were studied for eligibility and suitability during the planning process for the 2008 ROD/RMP; the recommendations from that process should be carried forward to any future RMP revision. Four river segments were found suitable and receive interim protective management measures as identified in the RMP. An additional 16 river segments were found eligible, but have not been studied for suitability. These segments should also receive interim protection management measures until they are studied for suitability. In 2008, two proposed bills (Oregon Treasures Act of 2008 - HR. 6291, and Lower Rogue Wild and Scenic Rivers Act of 2008 - S. 3149) identified six additional river segments on the Medford District that were not studied for eligibility or suitability during the RMP planning process.

Wilderness Study Areas

As mandated by FLPMA, the Oregon State Office completed an inventory of lands with wilderness characteristics by 1991. From this report, Medford had one area that was designated as a Wilderness Study Area (WSA), known as Soda Mountain, and an Instant Study Area (ISA), known as Brewer Spruce. All O&C lands were exempted from the wilderness review required by Section 603 of FLPMA. WSA and ISA objectives and management actions are identified and have been implemented. The Soda Mountain Wilderness Study Area was formally designated as part of the National Wilderness Preservation System by the Omnibus Public Lands Management Act of 2009 (Public Law 111-011, March 30, 2009). The Brewer Spruce ISA is still being managed as required.

Lands with Wilderness Characteristics

In 2007, during the WOPR planning process, Medford conducted an inventory of lands with wilderness characteristics regardless of if its O&C or public domain. A total of 34 potential units were identified by BLM with an additional 26 units proposed by the public (Wilderness Society). Of these 60 units reviewed, only four units met the criteria (size, naturalness, solitude, and primitive recreation) for lands with wilderness characteristics. The ROD/RMP has no mention of lands with wilderness characteristics.

There has been one major change for the lands with wilderness characteristics in relation to law, policy, new statutes, proclamations, Executive orders, etc. that may or may not need to be addressed in the ROD/RMP. In February, 2011, BLM adopted newly revised manuals including 6301 – Wilderness Characteristics Inventory; 6302 – Consideration of Lands with Wilderness Characteristics; and 6303 – Consideration of LWCs for Project Level Decisions in Areas Not Analyzed in Accordance with BLM Manual 6302. These manual provide new direction at both the RMP level and implementation level for inventories, planning, management, and project analysis. There is a potential need to conduct maintenance on inventories for lands with wilderness characteristics pursuant to BLM's responsibility to maintain inventories on a continuous basis if a plan revision occurs. On July 25, 2011, the Washington Office issued an Instruction Memorandum (2011-154), which placed these manuals in abeyance until further notice.

5.9 Special Areas - Areas of Critical Environmental Concern

The RMP/EIS addresses special areas in the ROD/RMP on page 56, while progress is reported in the 2009 Annual Program Summary on pages 20-22.

The 26-existing designated Areas of Critical Environmental Concern (ACEC) are being managed according to prescribed directions. There are seven Areas of Critical Environmental Concern nominations that have been evaluated and found to meet relevance and importance criteria. These are being managed under interim management following Areas of Critical Environmental Concern policy. Resource Management Plan special area actions implemented (12 Research Natural Areas, 14 Areas of Critical Environmental Concern, 8 proposed Areas of Critical Environmental Concern and 1 Outstanding Natural Area) (pages 56-62):

- District actions are maintaining existing Areas of Critical Environmental Concern/Research Natural Areas.
- District actions provide for recreational uses and environmental education in the one Outstanding Natural Area (e.g., Table Rocks).
- Surveys, community mapping, and management plans have been prepared for five ACECs. Two written draft management plans have been prepared and one plan is being developed for ACECs at the time of this RMP review.
- Seven new Areas of Critical Environmental Concern that were nominated by of staff and the public have been reviewed and identified for consideration in the next RMP amendment or RMP revision. Interim management direction has been implemented to protect the values at each of these nominated areas.
- Access has been limited in some ACECs where OHV use and damage has been occurring (gates/barricades).

There is a need for special protection to prevent OHV trespass into a number of ACECs (Rough and Ready, French Flat, Lost lake, Round Top and Brewers Spruce) or requirements for supplemental inventories elsewhere.

There is a need to include acquired lands adjacent to Table Rocks ACEC in the ACEC (37 acres at Lower Table Rock acquired from The Nature Conservancy).

Overall, Area of Critical Environmental Concern elements of the RMP are functioning for resource protection and do not require an additional RMP amendment or acceleration of the RMP revision process.

5.10 Botany and Special Status Plants, Invasive Species and Noxious Weeds, and Rangeland Resources, Livestock Grazing, and Wild Horse and Burro Management

5.10.1 Rangeland Resources, Livestock Grazing, and Wild Horse and Burro Management

The grazing management and wild horse and burro actions outlined in the RMP are being implemented as authorized by the plan and are current with new and developing issues.

The Medford District has a total of 89 grazing allotments. Stocking levels and time frames for use of the 51 active allotments continue to be permitted/leased, while 38 allotments are vacant. Overall, active use averages 62 percent of the total authorized use level available. Rangeland improvement projects and maintenance are being planned and implemented.

The Cascade-Siskiyou Monument EIS and Management Plan has been published. Soda Mountain Wilderness Area Stewardship Plan and EA was published October 2011. Livestock grazing issues only remain on 4 allotments within the monument area; Box R, which is pending a relinquishment agreement; 32 CSNM acres in the Deadwood Allotment that will be removed from the Deadwood Allotment when the EA/Grazing Decision is final; and 2 allotments, Buck Mountain and Dixie which remain active. All other allotments were relinquished by lessees as made possible by the provisions of Public Law 111-11, Omnibus Public Lands Act of 2009.

The Medford District does not have direct responsibility for any Wild Horse Herd Management Areas. A portion of the Pokegama Wild Horse Herd Area overlaps the Medford/Lakeview District boundary, but the herd is managed by the Klamath Falls Field Office and its management situation is addressed in the Klamath Falls RMP evaluation. Monitoring and compliance checks continue on approximately 15 horse adopters participating in the Wild Horse and Burro Program.

5.10.2 Botany and Special Status Plants

The RMP implementation direction is found on ROD/RMP pages 50-56 and in Appendix C. Progress was reported in the 2009 Annual Program Summary on page 16. Actions outlined in the plan are being implemented and include:

- Review of proposed actions and determination of effects for Bureau Sensitive Species and protect species (buffers/avoidance).
- Completion of field surveys (contracts) for listed and Bureau Sensitive Species prior to actions (approximately 50,000 acres a year).
- Entered all survey polygons and site records into GeoBOB for Special Status and Survey and Manage Species.
- Implementation of long-term (demographic) monitoring for two of four federally listed plants and six Oregon Bureau Sensitive species (Challenge Cost Share).
- Revisits for Gentner's fritillary (57 sites) and Cook's lomatium (31 sites) in 2010.
- Two reintroduction projects are ongoing for Gentner's fritillary and Cook's lomatium.

There are some unmet needs and new management opportunities that could be met through activity or program-level actions. Critical habitat was designated in 2010 for Cook's lomatium and an RMP amendment or RMP revision may be needed to address this. Existing conservation strategies which focus on active restoration of Special Status Species elements and the development and use of native species for restoration/revegetation do not need RMP amendments.

No District-wide botanical inventories are warranted as a baseline for any RMP revision although the project-level inventories are important for analysis of effects and compliance with Special Status Species policy. The continuation of surveys for Threatened and Endangered, Special Status, and Survey and Manage species is imperative to provide information needed for management. The District has been very successful in project-level surveys, finding Special Status Species, and protecting them in project areas. Special Status Species inventories within grazing allotments are occurring for lease renewals/Environmental Assessments. Landscape-level inventories (proactive) for Special Status Species (including listed or State-listed species) would be useful but are currently not needed for analysis of effects and compliance with Special Status Species policy. Few Late-Successional Reserve surveys for Special Status Species plants have occurred, as the Medford District to date has not had many projects in those land allocations.

There are some new legal or policy mandates as a result of new statutes, proclamations executive orders, or court orders not addressed in the plan. Any RMP revision should reflect the BLM Oregon/Washington native species policy, the Presidential Executive Order on use of native species and the listed *Fritillaria gentneri* recovery plan, and designated recovery zones (if it changes land allocations) and the designated Critical Habitat for *Lomatium cookii*. The recovery plan for *L. cookii*, and designated recovery zones for *F. gentneri* will be will be addressed with plan maintenance, amendment or revision as appropriate.

5.10.3 Invasive Species and Noxious Weeds

Applicable program directions are outlined in the ROD/RMP on page 93 and progress reported in the 2009 Annual Program Summary on page 15. Plans and recommendations for weed control and eliminating or controlling nonnative plants are made by each Field Office, and the Integrated Pest Management Program is being implemented in various ways throughout the District. The evaluation of impacts of nonnative plants in Late-Successional Reserves has been done on an informal basis. Evaluation of impacts of nonnative plants is occurring for activities in other land allocations as well. An inventory for both weed and invasive species was completed on 60,000+ acres in 2010, in conjunction with Threatened and Endangered species surveys. Treatments included using manual and biological controls, chemicals, and competitive seeding. Prevention of spread is facilitated by a District Office vehicle wash facility and contract stipulations requiring washing of vehicles and/or equipment prior to entry into ”clean” areas. The program is coordinated with several watershed councils actively involved with various grants. Additionally the program is a participating member in the Jackson and Josephine Cooperative Weed Management Areas (CWMA) as well as the Garlic Mustard and Alyssum (yellow-top) working groups.

There are no new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis. The BLM Vegetation Management EIS for Oregon, signed in 2010 allows for the use of a broader spectrum of herbicides and type of vegetation for which herbicides can be used on. The EIS provides an opportunity to use an additional 10 herbicides in western Oregon, as well as herbicide treatment of native vegetation along right-of-ways, administrative sites, recreation sites, and improvement of habitat for Federally Listed and other Special Status Species. Additionally the EIS lists Standard Operating Procedures for application of herbicide.

5.11 Archaeology, Paleontology, Cultural and Historic Resources, including Native American Values

Actions outlined in the plan are being implemented. The applicable allocations and management prescriptions are described in the ROD/RMP on page 71. Paleo-environmental, archaeological, anthropological, and historical studies are accomplished in a variety of manners. A number of field schools in partnership with Southern Oregon University tested/evaluated both historic and prehistoric sites. Systematic inventories of areas likely to contain cultural resources are completed in response to project proposals and to fulfill Section 110 responsibilities as required in the National Historic Preservation Act.

The program supports ecosystem-based management by providing information about past ecological conditions, past cultural/natural system interactions, and differences among cultural

and social groups regarding ecosystem management values for a number of watershed analyses, as requested. There has been limited development of project plans to preserve, protect, and enhance cultural resource sites. The Protocol developed between the BLM and Oregon State Historic Preservation Office (SHPO) outlines how the BLM will interact and cooperate to identify, preserve, protect, and enhance cultural resources located on BLM land. Archaeologists regularly give cultural resource presentations to school groups and other public groups. Education and outreach programs target a wide variety of audiences, including Oregon Archaeology Celebrations, Archaeology in a Box Presentations, RAP camp, and presentations at Southern Oregon University. Archaeologists involve the media during field schools and other public out-reach projects. Archaeologists monitor cultural resource sites each year for evidence of vandalism and submit incidents of cultural resource site vandalism to Law Enforcement for action. Factors related to looting/vandalism of cultural resource sites include: an increase in the rural interface – more people, more roads; an increase in OHV use, especially motorcycles; an increase in recreational use of public lands; and potential effects from the downturn in the economy.

District staffs continue working with Native Americans to achieve the goals outlined in existing Memoranda of Understanding. The need to develop additional memoranda with Native American groups has arisen. Local, federally recognized Tribes have expressed interest to work together more closely on certain projects, such as the Table Mountain Management Plan.

Identification of sites with significant cultural resource properties for acquisition for public, cultural heritage, and scientific purposes has occurred. Since 2004, the BLM has acquired Winkle Bar on the Rogue River, the location of famous writer, Zane Grey's cabin.

The RMP allocations, constraints, and mitigation measures are effective in achieving the desired outcomes for cultural resources. The evaluation of archaeological and historical sites to determine their potential for contributing to public and scientific uses is an ongoing process and the number of site evaluations has increased in recent years. Since 2004, the Williams Creek Bridge, Almeda Mine, and the Zane Grey Cabin have been formally evaluated for significance and determined eligible for the National Register of Historic Places.

There have been no significant changes in the related plans of State or local governments, or other Federal agencies. There are no new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis in relation to the management of cultural resources.

Current management practices are sufficient for cultural resources but do not accurately address paleontological resources. Cultural resource managers are often times responsible for addressing paleontological resources in NEPA documents and cultural resource managers generally have minimal or no knowledge of paleontological resources. Inventories for paleontological resources are generally not being conducted during NEPA analyses as for other natural or cultural resources.

Inventories for cultural resources are currently being completed as part of the project compliance with Section 106 responsibilities. As staff time and funding allows, BLM archaeologists are conducting systematic inventories of areas likely to contain cultural resources.

There are some new legal or policy mandates as a result of new statutes, proclamations, executive orders, and court orders not addressed in the plan; however, they do not directly affect the timing or content of any RMP revision. The 1998 Protocol for Managing Cultural Resources on Lands Administered by the BLM in Oregon replaced the Memorandum of Agreement that the BLM had with the State Historic Preservation Office. The 1998 Protocol is currently going through a revision process. Under Executive Order 13287, "Preserve America," it is the policy of the Federal Government to provide leadership in preserving America's heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the Federal Government, and by promoting intergovernmental cooperation and partnerships for the preservation and use of historic properties. Under revised Oregon statutes (Oregon SB 243), the BLM is required to notify the Oregon Pioneer Cemetery Commission before a historic cemetery can be moved or destroyed by local action. NAGPRA (Native American Graves Protection & Repatriation Act) has new regulations, 43 CFR 10.11, that provides clearer regulations on disposition of culturally unidentifiable human remains. The BLM has developed clearer directives pertaining to ARPA (Archaeological Resource Protection Act) regulations.

Overall, the archaeology, cultural and historical resources elements of the planning unit are functioning and do not require an additional RMP amendment or acceleration of an RMP revision. Current management practices for paleontological resources are minimal and should be addressed during the next RMP amendment.

5.12 Mineral and Energy Resources, and Hazardous Materials

5.12.1 Mineral and Energy Resources

Locatable minerals were addressed in the RMP on page 76-80 and 213-217, but need to be updated. Clarification needs to be made between the surface management regulations at 43 CFR 3809 and the RMP. The entire section and accompanying tables in the RMP need to assessed for errors. The Master Title Plat is the source for identifying all mineral withdrawals and should be reference in the RMP. Most Withdrawals that were suggested in the RMP have not been completed due to the BLM's mineral policy to keep lands open to mineral exploration. The current 3809 regulations can provide sufficient protection to some of the areas that were designated for withdrawal but each site needs to be considered on a case by case basis. There are some areas that it is doubtful that mining and the intent of the recommended withdrawal are compatible.

There is an increased amount of locatable mineral activity at all levels – casual use, notice of operation and plan of operation on BLM managed lands. The trend is up with six pending plans of operation. The number of unauthorized occupancies has dropped due to a program to address unauthorized occupancies. Five residential occupancies are authorized.

There are currently ten known unauthorized occupancies that have year round or part time residential occupants. There are eight unauthorized occupancies that are nonresidential. There are over 830 active mining claims in the Medford District. There are four pending patents on the District. On the Medford District, two mineral patents are currently in litigation. An administrative law judge recently ordered patent to be issued on one. On the other the mineral exam is scheduled for FY12. The result of these could have implications for land allocations in future RMP revisions.

5.12.2 Hazardous Materials

No change in conclusions.

6.0 Socioeconomic Conditions

Socioeconomic analysis needs to be updated and needs to incorporate:

- The contribution of recreation and aesthetic values
- Analysis of ecosystem services
- Change in local and regional infrastructure supporting wood supplies and manufacturing

6.1 Payments

Associated tables need to be updated.

6.2 Contracting

Associated tables need to be updated.

6.3 Management Actions

The Medford District has also been active with the Southern Oregon Small Diameter Collaborative, the Applegate Partnership and other community groups in trying to find markets for small diameter products. The District is also working on development of the Middle Applegate Pilot project in cooperation with Norm Johnson and Jerry Franklin to apply and demonstrate their principles of ecological restoration in a dry-forest ecosystem.

Appendix 8

Klamath Falls Resource Area Supporting Data

Table of Contents

Klamath Falls Resource Area – RMP Evaluation Spreadsheet

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion*	
Land Use Allocations	X				
Watershed Analysis	X				
Timber Management	X				The timber management program (ASQ) is not sustainable as initially modeled under the present constraints relating to S&M and NSO habitat retention
Silviculture	X				
Forest and Woodlands Management (K Falls)	X				Have we treated more woodlands than we should have? Should there be a target?
Special Forest Products, Biomass	X				
Soils	X				Due to declining staffing levels, soil monitoring needs have not been met.
Hydrology	X				Restoration is proceeding at expected levels. No specific targets for hydrology.
Wildlife Habitat	X				The amount of suitable habitat retained is lower than anticipated under the RMP.
Wildlife including Special Status Species	X				The 2011 NSO recovery Plan and subsequent 2012 CHU may require an amendment or revision.

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion*	
Botany including Special Status Species	X				
Fisheries including Special Status Species	X				
Air Quality and Fire and Fuels	X				
Rural Interface	X				
Lands and Realty, Special use Permits, Utility Corridors, Communication Sites	X				
Roads, Access, Rights-of-Way	X				
Recreation	X				Need to revise RMP or complete Upper Klamath River plan with implementation of Klamath River settlement agreement
Off-highway Vehicle Use	X				
Visual Resource Management	X				
NLCS (Wilderness, Wild and Scenic Rivers, National Monuments, etc.)	X				New BLM requirements for "wildlands" inventory and protection. Management Plan for the W&SR has not been developed although values are being protected.
Areas of Critical Environmental Concern	X				Management Plans have not been developed for all ACECs although values are being protected.
Significant Caves	X				
Botany	X				

Program	2004 Evaluations Conclusion: Meeting Expected Outcomes		2004 Evaluations Conclusion: Not Meeting Expected Outcomes		Notes
	No Change in Conclusion	Change in Conclusion*	No Change in Conclusion	Change in Conclusion*	
Invasive Species/Noxious Weeds	X				
Archeology, Paleontology, Cultural & Historic Resources, including Native American Values	X				
Renewable Energy and Adverse Energy Impact Assessments	X				
Rangeland Resources, Livestock Grazing and Wild Horse & Burro Management	X				
Minerals and Energy	X				
Hazardous Materials	X				
Socioeconomic, Jobs in the Woods, etc.	X				
Payments	X				

Klamath Falls Resource Area ACECs

District	Name	Acres	Status	Year Designated	Relevant and Important Values
Klamath Falls RA	Bumpheads	112	Potential	2008	Cultural, Natural System
Klamath Falls RA	Miller Creek	939	Existing	1995	Scenic, Wildlife, Natural Systems
Klamath Falls RA	Old Baldy RNA	355	Existing	1995	Natural Systems
Klamath Falls RA	Tunnel Creek	72	Potential	2008	Wildlife, Natural Systems
Klamath Falls RA	Upper Klamath River	4670	Existing	1995	Scenic, Historic, Cultural, Fish and Wildlife, Natural Systems
Klamath Falls RA	Upper Klamath River Addition	695	Potential	2008	Cultural, Scenic, Wildlife, Natural System
Klamath Falls RA	Wood River Wetland	3225	Existing	1995	Cultural, Fish and Wildlife, Natural Systems,
Klamath Falls RA	Yainax Butte	707	Existing	1995	Cultural, Natural Systems, Botanical

*Potential ACEC's were proposed under 2008 RMP, and are being managed under 'Interim management' following ACEC policy until RMP legal issues are resolved. "Existing, proposed to drop", are ACEC's that no longer meet the Relevance and Importance criteria, would preclude sustained yield timber production on O&C lands, or don't need special management attention under the 2008 RMP. These too are under interim management.

Klamath Falls Resource Area – 2010 Resource Management Plan Evaluation
Allowable Sale Quantity Findings

1) Timber sales associated with the lands allocated to sustained yield timber production have departed substantially from the assumptions used in the RMP determination of the Allowable Sale Quantity (ASQ).

    - **ASQ Not Achieved** - During the evaluation period, sale volume was 76% of the declared ASQ.

    - **Regeneration Harvest - Below Assumed Level** - The RMP determination of the ASQ assumed 32% of the volume would come from regeneration harvest sales. During the evaluation period, regeneration volume was 7% of the RMP assumed level.

    - **Thinning Volume/Acre - Below Assumed Level** - Thinning sale volume per acre was 70% of the RMP assumed level.

    - **Total Sale Acreage - Exceed Assumed Level** - Over the life of the plan total sale acreage sold was 156% of the assumed level. The thinning acreage was 179% of the RMP assumed level and the primary cause for the total acreage departure.

2) The current approach to a forest management regime that deviates so considerably from the RMP assumptions used in determination of the ASQ is not sustainable at the declared ASQ level.

    - The RMP determination of the ASQ is based upon an assumed cycle of regeneration and thinning harvest. Sustainability of the declared ASQ relies on the implementation of the assumed harvest.

    - The reduced level of regeneration sales has been a trend over the life of the plan.

    - The declared ASQ was based on regeneration harvest of mature forest. The ASQ cannot be sustained at the currently declared level if regeneration harvest is not implemented.

    - Implementation of sales at 76% of the ASQ while exceeding the assumed harvest acres by 156%, for full implementation of the ASQ, raises questions about the adequacy of the cumulative effects analysis supporting the 1995 RMP.

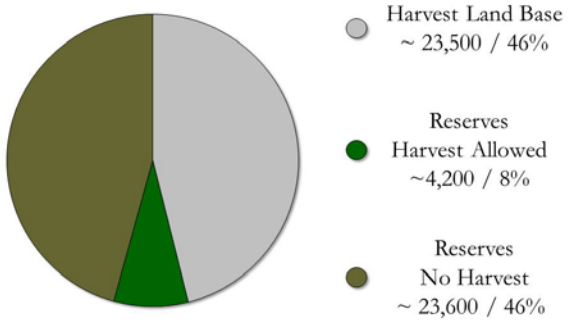
    - Reduced intensity of thinning has long term effects on future thinning and regeneration harvest yields.

Klamath Falls Resource Area – 2010 Resource Management Plan Evaluation

Timber Resources – Supporting Data

Resource Management Plan Allocations Related to Timber Harvest[1]. Figure 1

The Resource Area 51,300 acres, as related to timber harvest, are described in three categories:



Harvest Land Base – The General Forest Management Area lands are managed for sustained yield objectives and are the basis for the Allowable Sale Quantity (ASQ). This equates to the Matrix allocations of the Northwest Forest Plan. This evaluation of Timber Resources is for the "West Side" lands only. The "East Side" lands are not managed for sustained yield timber objectives and have no ASQ.

Reserves Harvest Allowed – Klamath Falls Resource Area does not have any large block Late-successional Reserves (LSRs). Harvest is allowed within Riparian Reserves, for reserve land objectives. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the riparian reserves. Timber sale volume from reserves does not contribute to the ASQ, because it is not a sustainable source of volume for the long term.

Reserves No Harvest – This category includes: LSRs (100 acre spotted owl core areas), portions of the Riparian Reserves, recreation sites, lands not suitable for timber production, Areas of Critical Environmental Concern, and other allocations under the RMP in which timber harvest is generally not permitted.

Allowable Sale Quantity – ASQ Declaration

The O&C Act requires that the annual productive capacity be determined and declared. The ASQ is based on the capacity of the lands, allocated to sustained yield objectives, to produce timber at a level that will remain constant over time. The General Forest Management Area is the land allocated for this purpose. In conjunction, the assumptions for the cycle, intensity, and harvest methods determine the sustainable harvest level from these lands. In simplistic terms, the sustained yield reflects a harvest rate that is in balance with forest growth on the harvest land base.

The Klamath Falls Resource Area 1995 Record of Decision declared the allowable sale quantity of 5.9 million board feet.

[1] Harvest Land Base data - 1995 ROD Table R-1, Reserves categories estimated based on personal conversation with Mike Bechdolt. Delineation between the two reserves categories is an approximate estimation.

Acronyms / Terminology

- ASQ - Allowable Sale Quantity.
- LSR - Late-Successional Reserves.
- Regeneration – Volume and acres associated with regeneration harvest.
- Thinning – Volume and acres associated with the range of harvest types, including commercial thinning, mortality salvage, and density management.
- Evaluation Period – Fiscal years 2004 through 2010. Data is provided for the 16 years since the beginning of the RMP in some cases to provide context.
- Volume – Eastside Scribner 16 foot short log measure.

Evaluation Standards

RMP Assumptions / Projections - The underlying assumptions from the RMP determination of the ASQ are used as the standard to measure plan conformance. These assumptions include the levels of regeneration and thinning harvest volume and the associated treated acres. The term "projections" equates to the RMP assumptions over a period of time such as the evaluation period or the life of the plan.

Sold Timber Sales - The volume and acres associated with sold timber sales are used as the evaluation standard for implementation. Not all sold sales were implemented at the time of the evaluation. The PVJ timber sale was sold in 2008 and mutually canceled[2] in 2010. The sale was re-offered in 2010 but went no bid. It is the only no bid sale as of the end of fiscal year 2010.

The "East Side" lands under the Klamath Falls RMP are not managed for sustained yield objectives. The RMP forecast approximately 400 thousand board feet annual timber production capability which has been achieved during the evaluation period.

Disclaimer

The data in this report was compiled from a variety of sources spanning over 16 years. There may be minor inconsistencies with previously reported information. The purpose of the data in this report is to portray the implementation of the timber sale program and how it conforms to the assumptions of the Resource Management Plans. The display of the data is intended to show the general magnitude for comparison purposes.

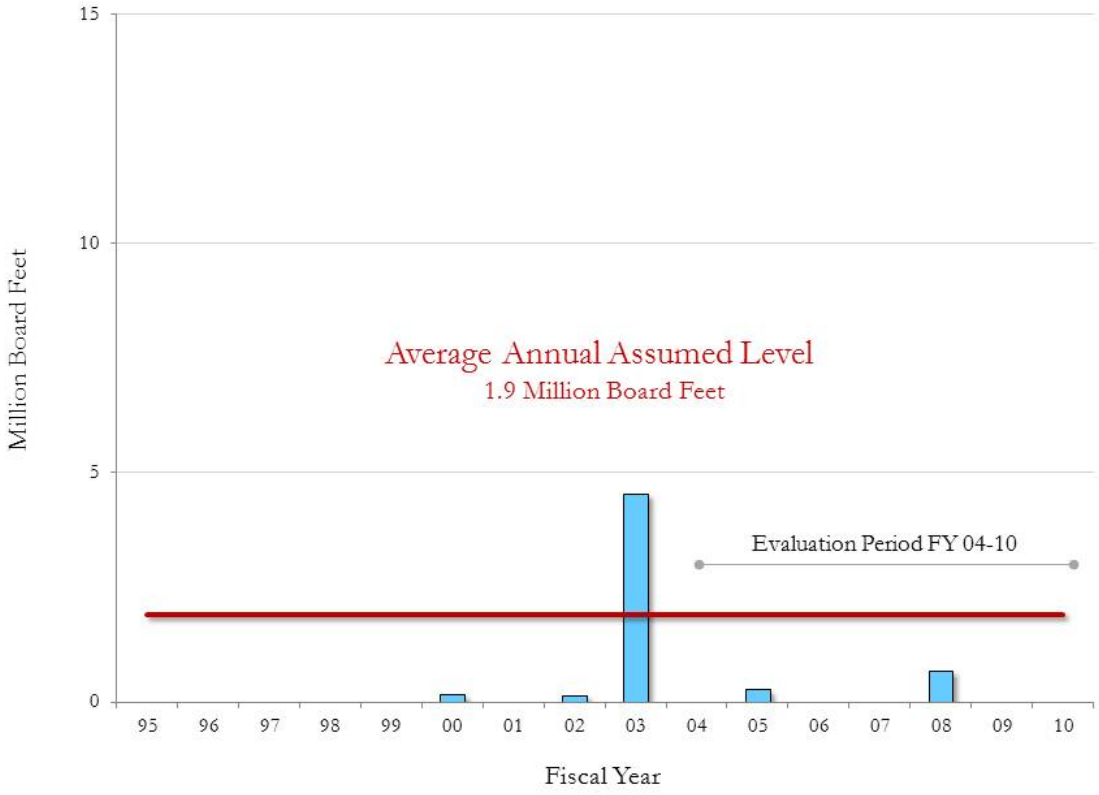
[2] Washington Office Instruction Memorandum No. 2010-003

Evaluation of Timber Resources

1) ASQ - Regeneration / Thinning Volume and RMP Assumptions

Figure 2 – ASQ Regeneration Volume by Fiscal Year

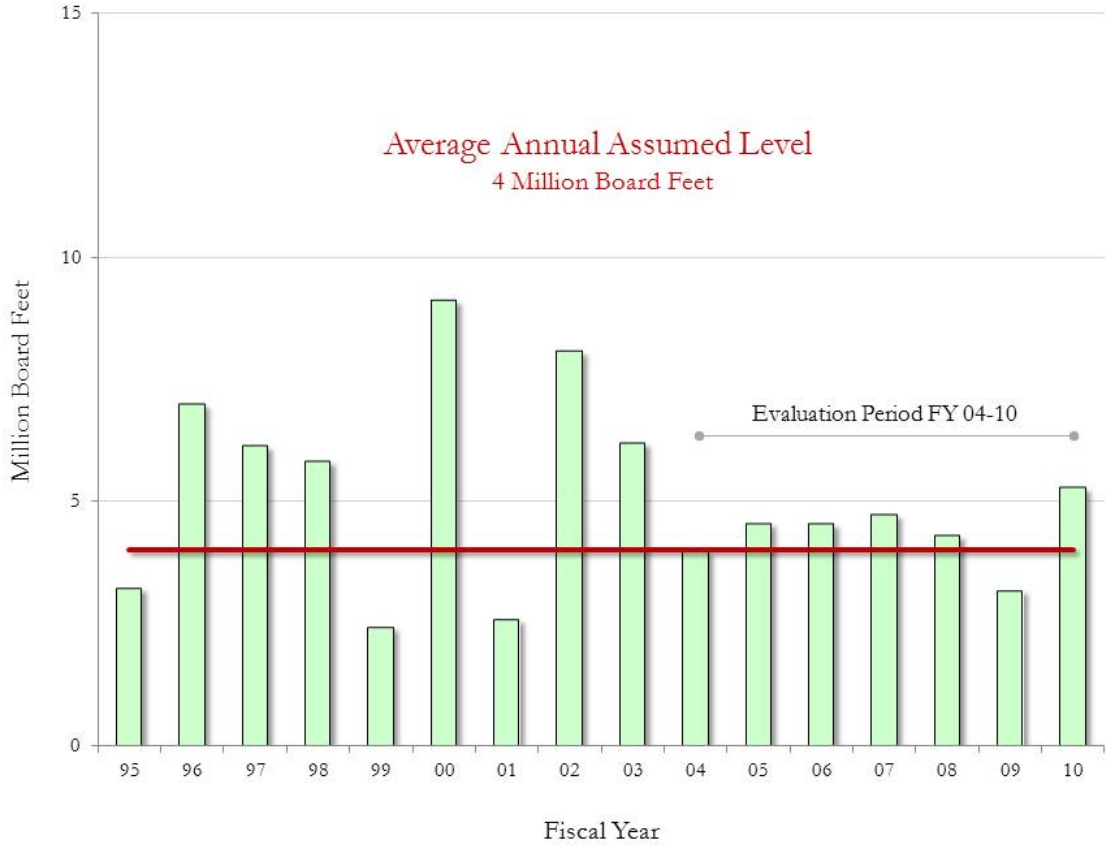
RMP assumed average annual volume level (red) compared with sold volume (blue).



- Regeneration sale volume has not occurred at the RMP assumed level.
- Since 1995, regeneration sale volume has averaged approximately 19% of the RMP assumed level with the majority occurring in fiscal year 2003.
- Evaluation Period
  - Regeneration sale volume totaled less than 1 million board feet.
  - Regeneration volume was approximately 7% of the RMP assumed level.

Figure 3 – ASQ Thinning Volume by Fiscal Year

RMP assumed average annual volume level (red) compared with sold sale volume (green).



- Since 1995, thinning volume, on average, was 126% of the RMP assumed level.
- The modeling of density management harvest, used in the determining the ASQ, assumed patch cut openings would be implemented within the harvest units. Patch cut openings were assumed to be up to 15% of density management treatment volume but to date have made up approximately 1%. Since 1995 approximately 2.3 million board feet has been from patch cut openings.
- Evaluation Period
    - Thinning volume averaged 4.4 million board feet per year.
    - Thinning volume was 109% of the RMP assumed level.

Figure 4 – Total ASQ Volume by Fiscal Year

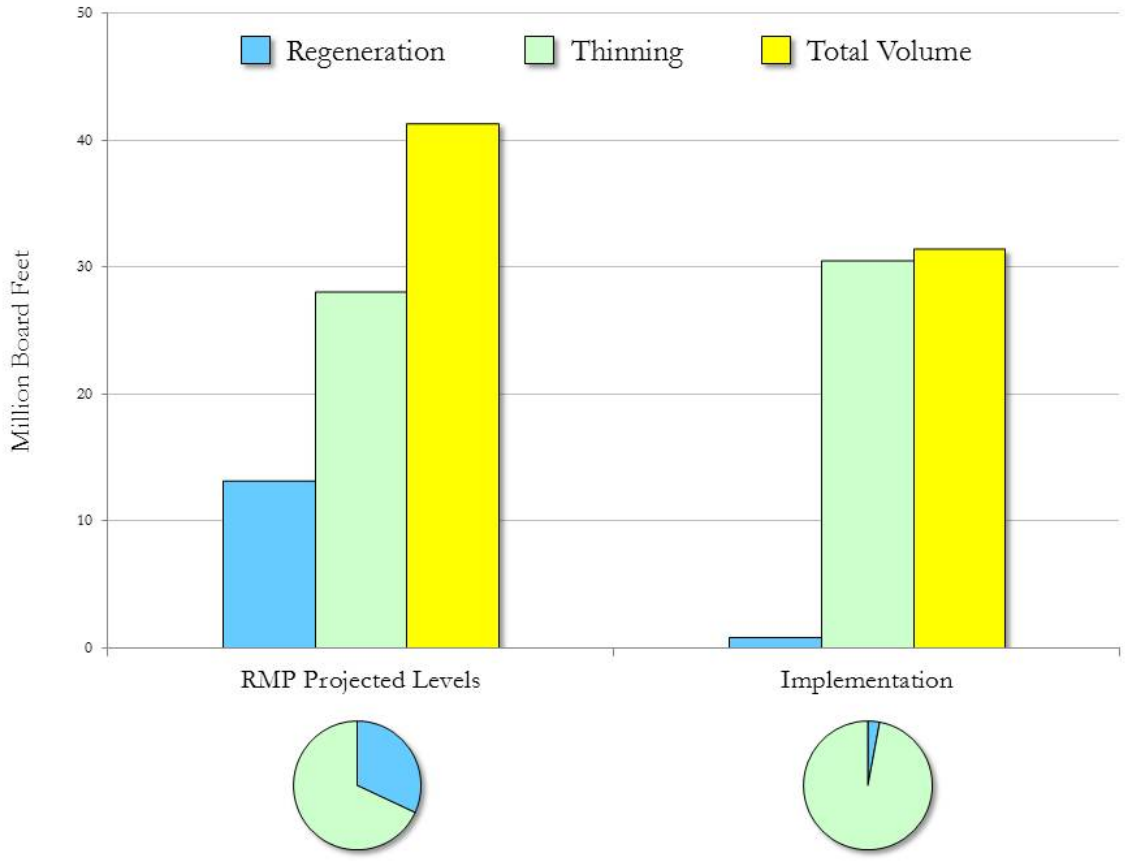
RMP declared Allowable Sale Quantity (purple) as compared with sale volume of regeneration (blue) and thinning (green) by fiscal year.

- Fiscal years 1995 through 2010 cumulative sale volume was 92% of the ASQ.
- Evaluation period
    - Sold volume totaled 31.5 million board feet and averaged 4.5 million board feet annually.
    - Sold volume was 76% of the ASQ.

Figure 5 – Total ASQ Volume – Evaluation Period - Projected and Implementation.

Left bars and pie - RMP projected assumed levels for the evaluation period.

Right bars and pie - Implementation - timber sales sold during the evaluation period.

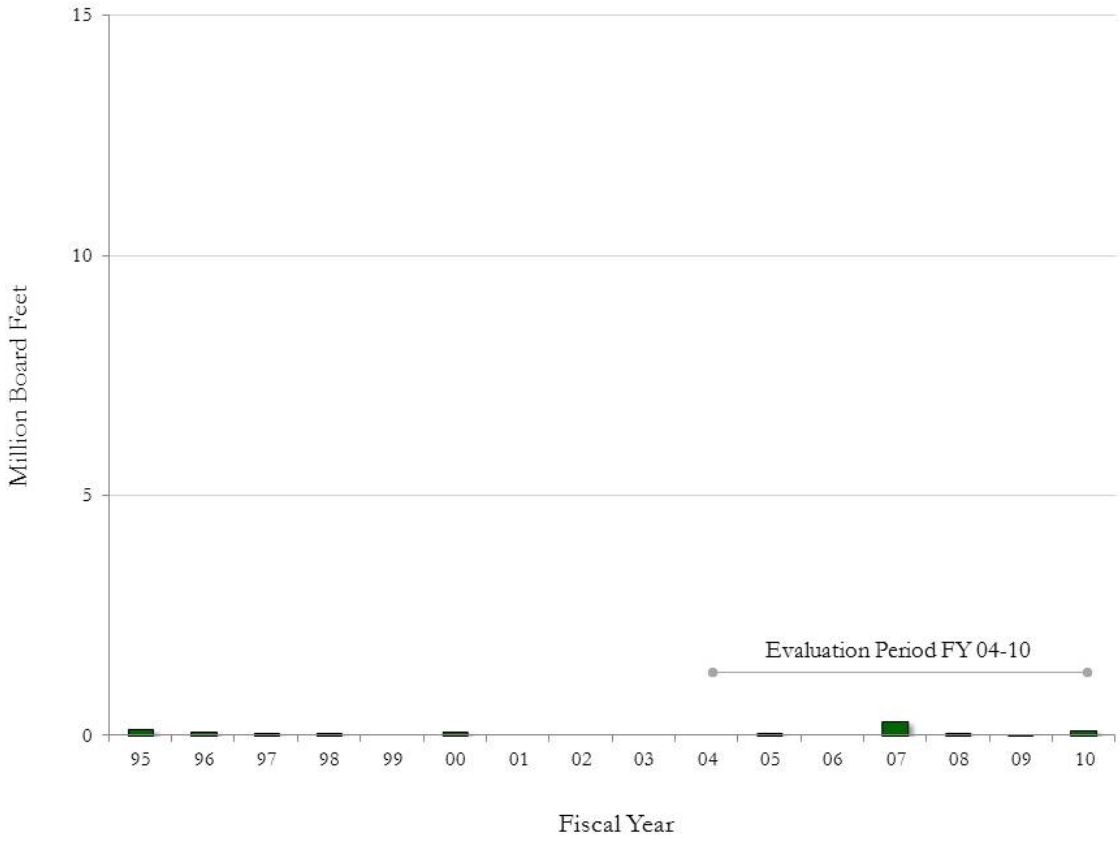


- Evaluation Period
  - Total sold volume was 76% of the RMP projected level.
  - Regeneration volume was approximately 7% of the RMP projected level.
  - Thinning volume was 109% of the RMP projected level.
  - The RMP assumed that 32% of the volume would be from regeneration and 68% from thinning (left pie).
  - Sold sales were 3% regeneration and 97% thinning (right pie).

2) Non-ASQ - Reserve Volume

Harvest is allowed, for reserve land objectives, within LSR and Riparian Reserves. Klamath Falls Resource Area does not have any large block LSRs. The 1995 Resource Management Plan (RMP) did not assess the potential harvest volume from the reserve allocations. Harvest from reserves does not contribute to the ASQ because it is not planned to be repeated over the long term and thus is not a sustainable source of volume.

Figure 6 – Reserve Volume by Fiscal Year



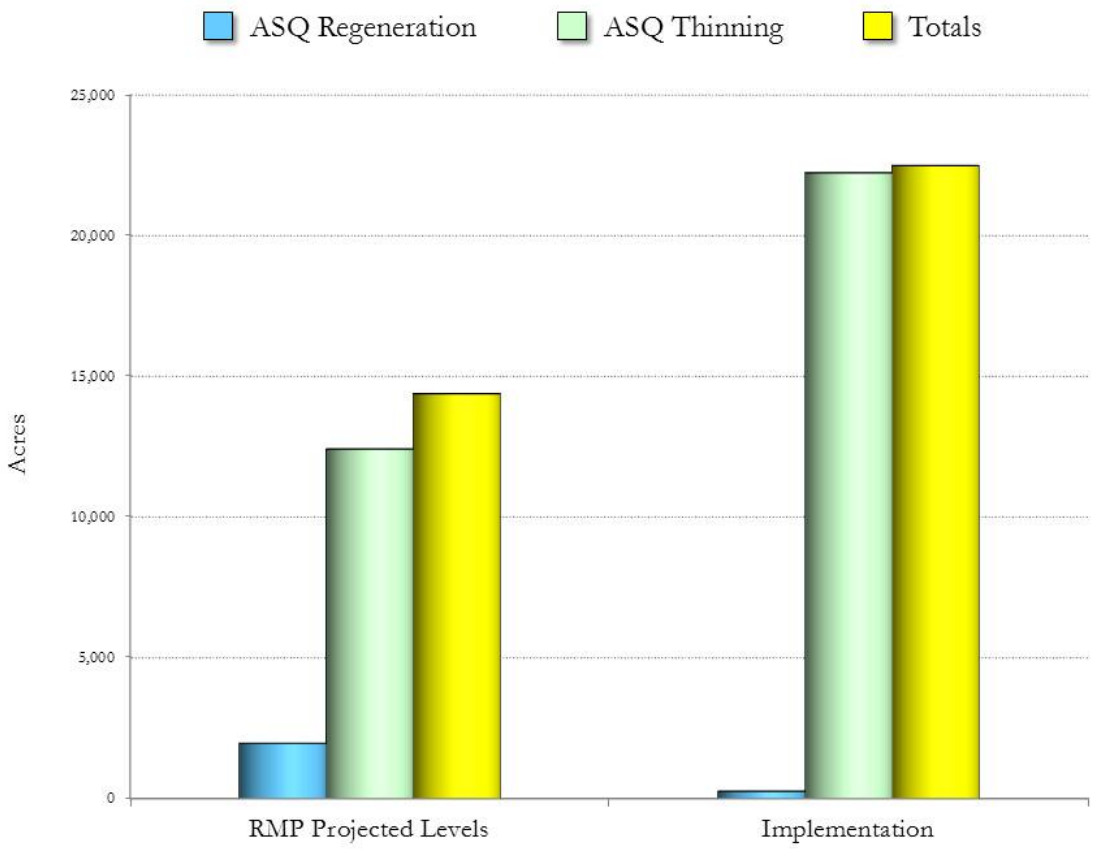
- Evaluation Period
    - Total sale volume from reserves was approximately .5 million board feet.

3) ASQ Acres – Projected and Implementation

Figure 9 – Total Timber Sale Acres – Harvest Land Base - ASQ

Left bars - RMP projected assumed levels for FY1995-2010.

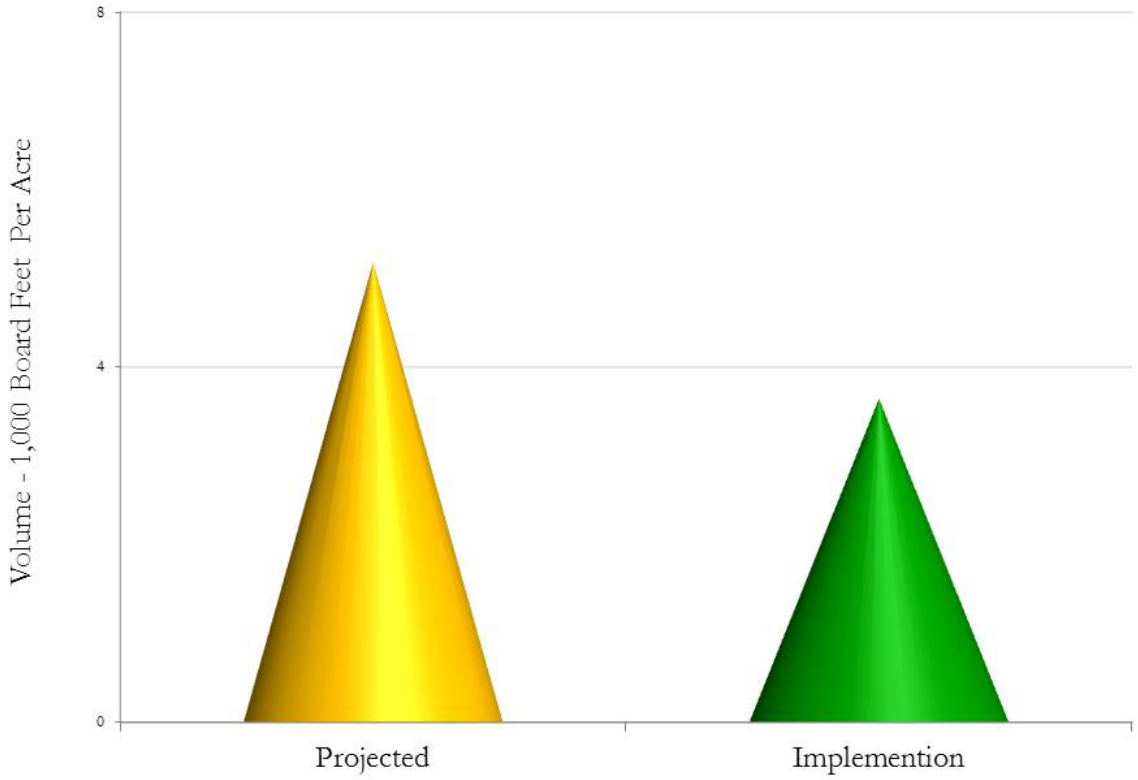
Right bars - Implementation of timber sales sold for FY 1995-2010.



- Fiscal Years 1995 – 2010
  - Regeneration sale acreage was13% of the RMP projected level.
  - Regeneration sale acreage of stands 150 years and older were 40% of the RMP projected level (not displayed in the graphic).
  - Thinning sale acreage was 179% of the RMP projected level.
  - Total sale acreage was 156% of the RMP projected level.

4) ASQ Thinning Volume Per Acre – Projected and Implementation

Figure 10 – Projected Volume Per Acre and Implementation Fiscal Years 1995 - 2010.



- Fiscal Years 1995 – 2010
    - The determination of the ASQ assumed an average of approximately 5 thousand board feet would be harvested per acre with thinning harvest.
    - Over the life of the plan thinning sales have averaged approximately 3.6 thousand board feet per acre.
    - The ASQ thinning volume per acre was 70% of the RMP projected level.

5) Changed Circumstances and New Information

- The BLM has generally avoided timber sales or modified prescriptions within the home ranges of known or predicted spotted owl sites to minimize effects on spotted owls and owl habitat. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Management of Survey and Manage sites in the harvest land base was not considered in the determination of the ASQ. As sales are designed and sites are identified, acres are reserved from harvest units. The BLM has also been avoiding timber harvest on lands in the harvest land base which are likely to have occurrences of survey and manage species, because of the necessary investment in surveys and resulting effects of species occurrence on sale viability. This has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Anticipation of protests and appeals has caused the BLM to avoid regeneration harvest, especially regeneration harvest of older forest. This has implications for the sustainability of timber harvest, and has effectively reduced the land available for harvest from what was assumed by the 1995 RMP determination of the ASQ.

- Widespread individual tree mortality is persistent in the Klamath Falls Resource Area. The need for forest health treatments to reduce overstocking of white fir and to improve resiliency has led to an emphasis on thinning treatments and a de-emphasis on regeneration harvest. This is a different mix of harvest than anticipated by the 1995 RMP and determination of the ASQ.

- The 2008 FEIS evaluated the volume potential utilizing current inventory and improved mapped data on allocations. The 2008 FEIS analysis of continued implementation of the 1995 RMP (i.e., the No Action alternative in the 2008 FEIS) indicated the sustainable harvest level for the Klamath Falls Resource Area would be 6 million board feet. The 2008 FEIS analysis of continued implementation of the 1995 RMP indicated that there would be an incidental amount of volume resulting from thinning riparian reserves.

- The 2008 FEIS evaluated the volume potential for managing these lands under an uneven aged management approach (2008 RMP) which indicated a sustainable harvest level of 5 million board feet. The uneven age approach analyzed relies on a variety of density management treatment with patch openings. The uneven age management approach had both timber and improvement of forest resiliency as objectives and is similar to sales implemented in recent years in the Klamath Falls Resource Area.

RMP 2011 Evaluation Questionnaire – KFRA

1. Do the 1995 RMP decisions appear to be correct and proper over time (e.g. is there a need for plan amendment or revision)?

Review 2004 Evaluation Report using "Questions an RMP Evaluation Should Answer": The 2004 Evaluation was reviewed.

- The KFRA Interdisciplinary Team documented the evaluation of RMP implementation in the following Report, "KFRA RMP Eval Combined Input 2011.doc".

A conclusion that there is new information that would change a program's 2004 evaluation conclusion regarding validity of 1995 decisions should be documented.

- The KFRA Interdisciplinary Team documented conclusions about RMP implementation in the following Reports, "KFRA RMP Eval Conclusions 2011.doc", and "KFRA RMP Eval Conclusions 2011-Summary.doc".

2. Are there targeted minor plan amendments or plan maintenance opportunities specific to your district (i.e. updated communication sites, land tenure) that would facilitate RMP implementation? Provide a narrative describing the need and timing.

Plan amendments or plan maintenance Topic/Title: Lands – Land Tenure

Narrative: The interdisciplinary team has several recommendations on land tenure that should be changed. The following lands were incorrectly identified as Zone 1 on the map and should have been in Zone 3, T37S, R11E, all sections (parcels near Klamath Forest Estates); T39S, R12E, Sec. 28, NESW (isolated parcel in Langell Valley). The following lands were incorrectly identified as Zone 3, and should have been in Zone 1: T41S, R10E, Sec. 9, NENE, and Sec. 15, S1/2N1/2.

The interdisciplinary team has reviewed all land tenure designations and has additional recommendations for changes, not considered errors in the 1995 RMP. Some of these are based on Rangeland Health Standards Assessments that occasionally include recommendations in regards to some of the small and unmanageable grazing allotments (section 15 grazing lands) and their potential for disposal. Some BLM parcels which are small, intermingled with private land pastures, and have no apparent special purpose, etc., may be recommended for disposal via sale or trade. These types of recommendations are being made only for the fragmented lands between Klamath Falls and the Gerber Block. Again, these are relatively minor changes in the RMP that can best be met through a plan amendment.

Plan amendments or plan maintenance Topic/Title: Riparian Reserves

Narrative: There are no targets for Riparian Reserve treatments in RMP so it is difficult to assess departure from expected outcomes. Watershed analysis and other NEPA analysis have adjusted riparian reserve widths and locations. Hydrography updates and field verification have reduced the amount of Riparian Reserve from what was initially mapped thus increasing the total General Forest Management Area lands. However, since there are no expected outcomes from riparian

reserve treatments, there is no opportunity to evaluate departure from expected outcomes for this issue. Plan maintenance could be completed to update the LUA map showing Riparian Reserve widths and to change the corresponding table to reflect changed acres.

Plan amendments or plan maintenance Topic/Title: Fish Habitat (Klamath Basin Settlement Agreement)

Narrative: The potential impacts of the Klamath Basin Restoration Agreement (KBRA) and the Klamath Hydro Settlement Agreement (KHSA) may affect BLM land and water resources management.

Implementation of the KBRA would have little or no effect with the exception of Wood River Wetland. The RMP Evaluation (2011) questionnaire did not address the Upper Klamath Basin/Wood River RMP. Depending on what was proposed under the KBRA with respect to breaching of the levees at Wood River Wetland could require a plan revision.

For the KHSA, Recreation Management of the whitewater boating and affected recreation sites would change. Additionally, a Sec 7 WSR determination of effects to Outstandingly Remarkable Values would need to be done but this probably wouldn't require plan revisions or amendments.

The RMP did not address anadromous fish management or anadromous fish habitat management. If certain actions in the KBRA/KHSA are implemented, several BLM rivers and streams would need to consider management/consultation changes.

If all hydropower facilities are removed adjacent to the Klamath River bypass reach, then the reach could meet the criteria for ACEC and Wild and Scenic River, therefore potentially changing land designation and management. An RMP amendment would be needed for this.

Major land transfers of ownership to BLM or purchases by BLM in the Upper Klamath River Canyon as a result of possible KBRA/KHSA actions would require changes (amendments) to the RMP.

Plan amendments or plan maintenance Topic/Title: Fish Habitat

Narrative: A Draft Bull Trout Recovery Plan and Final Rule Bull Trout Critical Habitat designation has occurred since the development of the Klamath Falls RMP. The USFWS is also in the process of revamping the Recovery Plan for the Lost River and Shortnose suckers.

Plan amendments or plan maintenance Topic/Title: Wildlife Habitat

Narrative: The 2011 NSO recovery Plan and subsequent 2012 CHU may require an amendment or revision.

Plan amendments or plan maintenance Topic/Title: Forest and Woodlands Management (K Falls)

We could set a priority of juniper treatment based upon habitat needs (sage grouse, mule deer,) that is keyed to Ecological Sites and the potential of the areas to provide that habitat. For example, if a Juniper Claypan 12-16" Ecological Site in PNC condition has a 12-20% cover of juniper, that could be a proposed target to achieve through juniper treatments. The RMP is less specific on actual sites to treat but ecological sites or desired future conditions in general could be used to describe our goals for treatment.

In the WOPR process to produce the 2008 RMP the Resource Area tried hard to develop management direction for managing juniper woodlands but it frustratingly got removed and the juniper woodlands got lumped into the Administratively Withdrawn LUA. (There is actually less direction than in1995 RMP). Ideally we would separate out the juniper woodlands into a specific LUA which would take a Plan Revision (or at least Amendment). Second to that we could use the direction that we tried to develop during WOPR and apply to the matrix (General Forest management Area) – East Side. This addition of guidance could be handled under a plan amendment, or perhaps even plan maintenance.

3. Has implementation of the timber harvest program been consistent with the assumptions of the declared Allowable Sale Quantity? Specifically: Have the mix of regeneration and thinning harvest in the harvest land base been consistent with the assumptions of the Allowable Sale Quantity (ASQ)?

No. The KFRA has averaged 16 acres/year of RH and modeled 131 acres/year.
Reasons for departure:

- Due to the significant amount of mortality that was experienced, few regeneration harvests were implemented. Very few stands south of HWY 66 met the criteria for prescribing Regeneration Harvests. The criteria are listed on page G10- Volume II of RMP.
- Due to forest health concerns related to overstocking or a high composition of second growth white fir in lower elevation stands, the priority has been to implement uneven-age, density management thinnings in those stands identified at the highest risk to insect, disease, and fire.
- Currently no regeneration harvests, including patch cuts, are being proposed on any matrix lands classified as NRF (nesting, roosting and foraging habitat for the Northern Spotting Owl (NSO).

The KFRA has averaged 941 acres/year of Density Management and modeled 828 acres/year.
Reasons for departure:

- One of the main reasons more acres had to be covered is that less volume per acre was being marked/harvested than modeled under the Density Management Prescriptions. Fewer patch cuts and regeneration harvests prescriptions were implemented than modeled. Patch Cuts were modeled to occur on up to 15% of the density management units. To date, approximately 1% of the Density Management units have received patch cuts.
- The Structural Protection Prescription describe on Page G-3 of Volume II of the RMP more reflects what the KFRA has implemented over the last sixteen years. This was the initial TRIM PLUS prescription that was used to arrive at the Draft PRMP 4.5MMBF/year ASQ figure.
- In the last two to three years, there has been increasing pressure on the KFRA from different publics to retain most of the larger tree component resulting in less volume/acre removed.

- Currently matrix lands that are classified as high quality Nesting, Roosting, and Foraging (NRF) habitat or are within a 1.2 mile radius spotted owl home range, will either not be harvested or only lightly harvested to retain NRF habitat. This is further constraining the capacity of the KFRA to meet ASQ targets as modeled.

Has regeneration harvest occurred across the range of age classes as assumed in the ASQ determination?

See Table. No acres of regeneration harvest occurred in stands 0-70 years of age, 76 acres in 80-140 years of age, 53 acres in 150-190 years of age, and 130 acres in stands 200+.

How much of the annual harvest has come from reserves?

Less than 1% of the total volume harvested over the past 16 years.

What is the harvest volume trend, for regeneration and thinning harvest, as compared to the ASQ and RMP assumptions?

Foreseeable trends include:

Minimal to no regeneration harvests with the exception of small 1-5 acres patch cuts to regenerate desirable shade intolerant species; Douglas-fir, all pines, and incense cedar
Retaining all high quality NFR habitat within the home range and other strategic areas per NSO Recovery Plan
Per public opinion, S&M settlement agreement, and NSO recovery plan, retaining all older and larger fire tolerant species; Douglas-fir, pines, and incense cedar.

Have the assumptions for lands available for harvest changed?

The KFRA has field validated most of its westside streams classification. Numerous westside intermittent streams which were included as part of the initial Riparian Reserve allocation have been reclassified as ephemeral. This has resulted in an increase in lands allocated as General Forest Management Areas (Matrix) and a reduction in lands allocated as Riparian Reserve.

In addition to the data in the spreadsheet, the districts will be requested to provide a short narrative on the status of sales which are: no bid, re-offers, mutually cancelled, sold unawarded as of the end of FY2010.

Note: The PVJ Timber Sale was originally sold and awarded in 2008, mutually canceled in 2010, and then reoffered and went "no-bid" in 2010. The PVJ TS is KFRA's only no bid sale that has not been sold. All other "no-bid" sales were eventually reoffered, sold, awarded and are completed. The KFRA has no sold unawarded timber sales. The KFRA had three sales on the mutual cancelation list. The Purchasers withdrew cancelation requests on two of those sales and both are currently operating. The third sale, the PVJ Timber Sale, was canceled and returned.

4. Does not apply to Klamath Falls Resource Area.

5. Were there any other programs shown as departing from expected RMP outcomes in the 2004 Plan Evaluations for your district? Determine if they are still departing from expected outcomes and provide a narrative along with relevant data. Provide a narrative along with relevant data. Narrative should describe urgency of the need for changed/new RMP direction and implications if not addressed or if delayed.

No programs fit this category; however one program was meeting but is now departing from the RMP. See discussion under "5b" below.

5b. Were there any other programs <u>shown as meeting</u> the RMP outcomes in the 2004 Plan Evaluations for your district <u>but are now departing</u> from expected outcomes of the RMP? Provide a narrative along with relevant data. Narrative should describe urgency of the need for changed/new RMP direction and implications if not addressed or if delayed.

Program Now Departing: Wildlife Habitat
The data is not necessarily new but was not reported in the 2004 evaluation. A substantial change that is different than the assumptions in the FEIS is the amount of acres of Northern Spotted Owl Nesting, Roosting and Foraging Habitat (NRF) maintained in the first decade.

In the FEIS the assumption was made for the PRMP that the amount of NRF habitat lost in the 1st decade would be 1,000 acres or 5% (pg. 4-74 FEIS) of the available NRF. Based on KFRA consultation documents through 2003 the actual amount of habitat downgraded was 4,731 or 21%. This divergence from the amount of habitat maintained in the FEIS was likely made due to determinations made in conjunction with the U.S Fish and Wildlife Service on what constituted suitable habitat post timber harvest. Plus as indicated in the 2004 evaluation and the 2011 evaluation the amount of overall acres entered for timber harvest was higher than projected in the RMP. The assumptions for habitat retention from the FEIS were based on projected management prescriptions and habitat goals (FEIS 4-27) because the Representative Timber Management Scenarios were not developed by the time these numbers were calculated. For the years 2004 – 2010 an additional 1,347 acres of suitable habitat were downgraded to dispersal habitat for a total of 6,078 or 28%.

This difference in the outcome versus the assumptions made in the FEIS needs to be qualified with the fact that the overall determination of what constitutes habitat is somewhat subjective and the determinations that have been made have varied through the years. Additionally, no habitat modeling has been conducted to determine if any habitat should have been upgraded from dispersal to NRF since the implementation of the RMP. A new habitat layer is planned to be developed in 2011 or 2012.