**To:** Matthew Betenson,
Marys Peak Field Manager
BUREAU OF LAND MANAGEMENT
Northwest Oregon District Office
1717 Fabry Road SE, Salem, Oregon 97306

**RE:** DOI-BLM-ORWA-N020-2025-0001-EA.

Dear Mr. Betenson,

Thank you for the opportunity to submit scoping comments on the Aloha Trout Forest Management project. I write on behalf of the Coast Range Association (CRA). We are glad the BLM encourages our participation in the development of this project.

The scoping letter states "*The BLM project includes approximately 1,400 acres of the HLB and approximately 400 acres of Riparian Reserve adjacent to proposed HLB-MITA harvest units. Stands proposed for treatment range from 40-130 years of age; approximately ninety-five percent of these stands are in the 70-year age class and younger.*" The CRA would appreciate receiving a GIS shapefile of the project area that identifies stand boundaries and forest age class. The data was available for the development of the BLM's Forest Management plan.

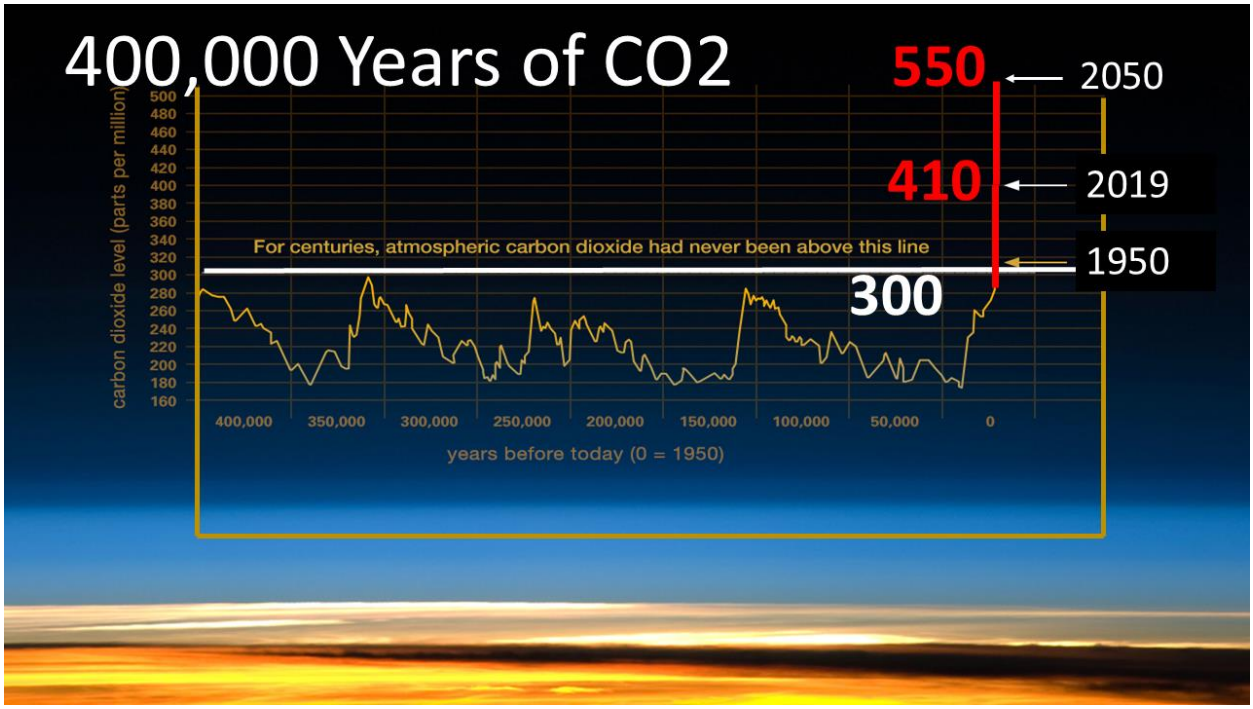
The scoping letter states "*Stands proposed for treatment have been previously harvested; most stands were clearcut in the 1950s and 1960s. Stands in the 60-year age classes and younger within the project area can be described as even-aged, single-story canopy, closed forest dominated by Douglas-fir. These stands are mostly overstocked, exhibiting short crowns, closed canopies, and are experiencing density mortality in the smallest diameter classes. The dense overstory is limiting the amount of sunlight reaching the forest floor, resulting in little to no understory development.*"

We are interested in the BLM's understanding of the impact of thinning plantations within a warming climate. Warmer and drier summers result in new, young plantations being highly flammable. Secondly, future tree growth will likely be compromised by vapor pressure deficit causing an increased loss of latewood tree growth. See: Impact of rainfall and vapor pressure deficit on latewood growth and water stress in Douglas-fir in a Mediterranean climate by Karla M. Jarecke [a,*], Kevin D. Bladon [a,b], Frederick C. Meinzer [c], Steven M. Wondzell [c] [a] *Oregon State University, Department of Forest Ecosystems and Society, Corvallis, OR 97331, USA* [b] *Oregon State University, Department of Forest Engineering, Resources, and Management, Corvallis, OR 97331, USA* [c] *US Forest Service, Pacific Northwest Research Station, Corvallis, OR 97331, USA*

The scoping letter goes on to describe "*Stands in the 70-year age class and older within the project area can be described in two ways. Stands in the 70-80 age-class are even-aged, single-story, closed canopy stands dominated by Douglas-fir. Stands in the 70-130 age-class are uneven aged, multi-layered, open-canopy stands comprised of multiple species and have a component of older, larger-diameter "legacy" trees.*" The scoping letter states, "*Stands proposed for treatment have been previously harvested*." Have the older stands, discussed above, been previously harvested? If so, did the current older stands

naturally regenerate? Are the 70-year age class stands stocking conditions the result of natural variability? It is further stated that in older stands "*western redcedar, are succumbing to competition from shade tolerant western hemlock.*" Perhaps the BLM can explain how shade tolerant red cedar is succumbing to competition due to shade.

We have no doubt, at this juncture of the project, that the project is consistent with the Northwestern and Coastal Oregon Record of Decision and Resource Management Plan (ROD/RMP). However, much has changed since the legwork (circa 2012-2014) on the ROD/RMP was signed. In the past ten years the biodiversity crisis and global warming caused by fossil fuel use and deforestation have accelerated.




One does not need to be a scientist to see the trouble we are in. Climate warming atmospheric CO2 is now outside of the range ever seen in the Holocene. The incoming administration is committed to massively more fossil fuel use. Our best hope lies in keeping forest carbon intact and increasing the forest's sequestered carbon volume – in the near term.

A global science study identified six regions on the planet for their irrecoverable carbon. The Pacific Northwest is one of those regions. See: *Mapping the irrecoverable carbon in Earth's Ecosystems* by Noon et al. at https://www.nature.com/articles/s41893-021-00803-6

The authors state "*The carbon released through the burning of fossil fuels would take millennia to regenerate on Earth. Though the timeframe of carbon recovery for ecosystems such as peatlands, mangroves and old-growth forests is shorter (centuries), this timeframe still exceeds the time we have remaining to avoid the worst impacts of global warming. There are some natural places that we cannot afford to lose due to their irreplaceable carbon reserves.*"

On the next page is a map of those places.

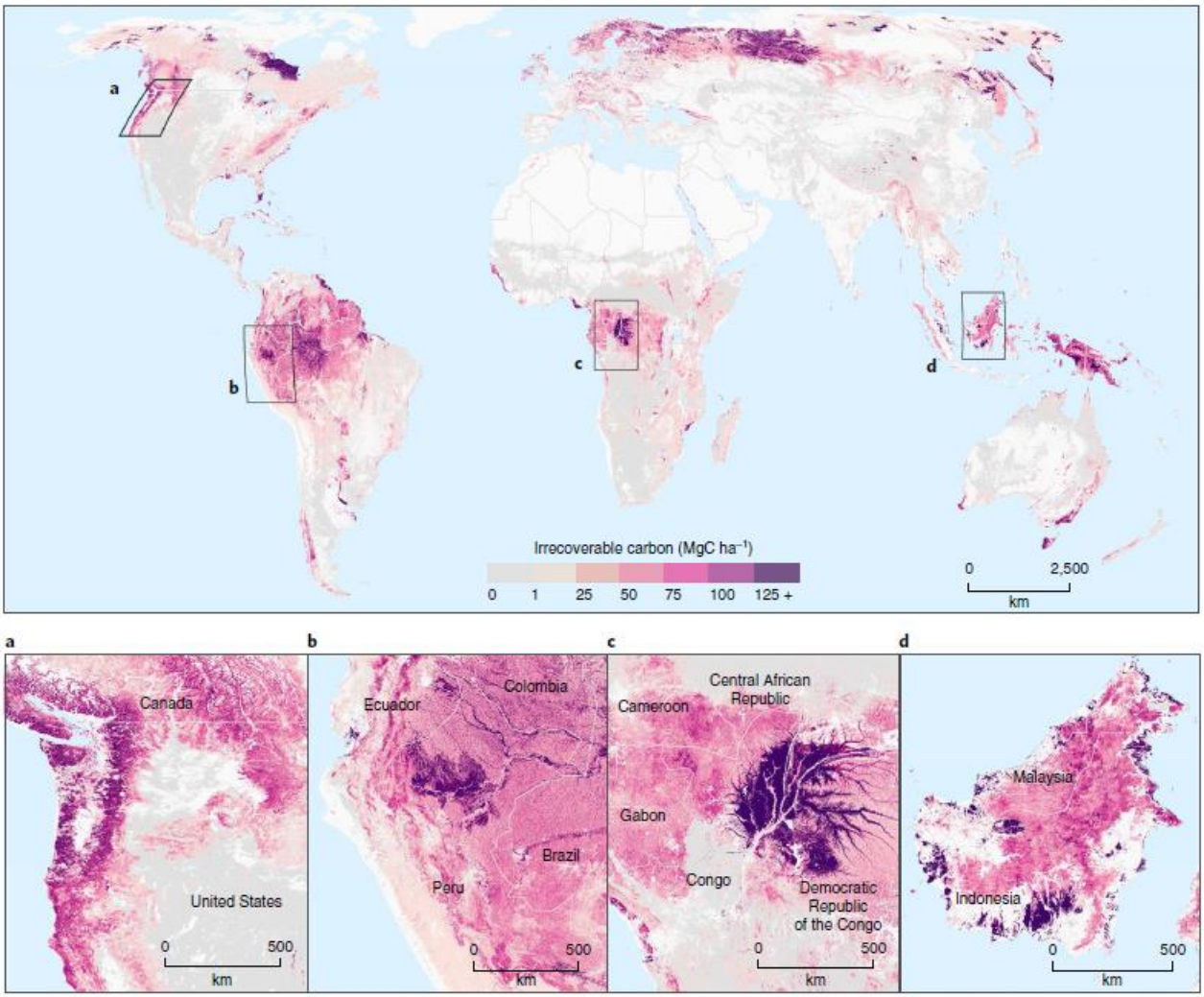



**Fig. 1 | Irrecoverable carbon in Earth's ecosystems. a–d**, Inlays show areas of high irrecoverable carbon density in the Pacific Northwest of North America (**a**), western South America (**b**), the Congo Basin (**c**) and the island of Borneo (**d**). Areas with zero irrecoverable carbon are displayed in grey to demonstrate the footprint of global manageable carbon.

It is our hope that the BLM will reconsider its timber program due to climate warming. If the nations of the planet stay on their current course, there will be no Oregon hemlock forests in the future.

It is our hope that the BLM will explain how retaining "*5-15 percent of the pre-harvest basal area in live trees*" is "*variable retention harvest*" or "*commercial thinning*."

The BLM proposes approximately 7 miles of new road construction. Please describe the anticipated width of vegetation removal for such road.

We are thankful that the BLM "*conducted fish presence surveys (upper limit fish surveys, spawning surveys, environmental DNA surveys) throughout the project area. Endangered Species Act – listed Oregon Coast (OC) Coho salmon, OC Chinook salmon (petitioned for listing), Bureau Sensitive OC steelhead and Pacific lamprey are found to occur within the project area, within Honey Grove Creek, Seeley Creek, and an unnamed tributary to Honey Grove Creek. In addition, upper limits of resident species have been determined for streams*

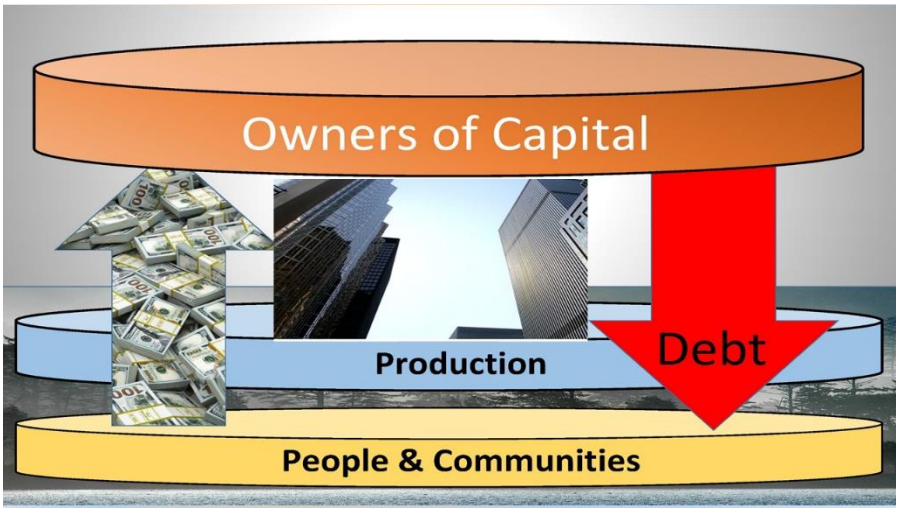
*within the project area (e.g., cutthroat trout, brook lamprey).*" Please explain how lethal peak summer low flows in streams will not be exacerbated by the further conversion of forest to fast growing plantations. We are confident you are aware of the science on peak low stream flows in the region.

The CRA asks BLM to acknowledge the statutory mandates and obligations included in the first paragraph of the 1937 O & C Act. We quote: "**§2601. Conservation management by Department of the Interior; permanent forest production; sale of timber; subdivision**

"*Notwithstanding any provisions in the Acts of June 9, 1916 (39 Stat. 218), and February 26, 1919 (40 Stat. 1179), as amended, such portions of the revested Oregon and California Railroad and reconveyed Coos Bay Wagon Road grant lands as are or may hereafter come under the jurisdiction of the Department of the Interior, which have heretofore or may hereafter be classified as timberlands, and power-site lands valuable for timber, shall be managed, except as provided in section 3* [1] *hereof, for* ***permanent forest production****, and the timber thereon shall be sold, cut, and removed in conformity with the principal* [2] *of sustained yield* ***for the purpose of*** *providing a permanent source of* ***timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilties****:*"[3] (Emphasis CRA)

Page 115 of the RMP/ROD states "*The BLM will continue to rely on the existing interagency effectiveness monitoring modules to address key questions about whether implementing actions* [are] *consistent with the RMP.*" Effectiveness monitoring includes the socioeconomic module. The RMP/ROD page 116 states "*The socio-economic effectiveness monitoring program assesses social and economic impacts of Federal forest management, framed as two questions: Are predictable levels of timber and non-timber resources available and being produced? Are communities and economies experiencing positive or negative changes that may be associated with Federal forest management?*"

Given today's economy, one highly organized around advanced technology and the pervasive influence of a financialized economy, why does the BLM believe timber harvest helps the local economy? Today's timber sector is highly mechanized and provides the bulk of its cash flow to non-local professionals, technical staff and the servicing of lease and debt payments as well as profit to owners. Such cash flow does not go to the local economy. An adequate description of today's economy is represented by the following image:



In short, the owners of business and capital extract resources from local communities and then send that wealth back to communities in the form of debt. Can the BLM explain how timber extraction benefits local communities compared to the timber economy's support for concentrated power and wealth?

Thank you for the opportunity to comment. We hope these comments contribute to a robust conversation.

On behalf of the Coast Range Association,

Chuck Willer
Executive Director
Coast Range Association

Forest in the Aloha Trout Forest Management Project planning area.
Photo by David Harasimtschuk used with permission

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