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Comments on
Western Oregon Plan Revision (WOPR)
Draft Environmental Impact Statement

Western Oregon Plan Revisions
PO Box 2965
Portland, OR 97208

January 2, 2008

Dear Sir/Madam:

We would like to submit comments on behalf of the Institute for Culture and Ecology regarding the draft environmental impact statement (DEIS) for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management Districts.

We focus our comments on two aspects of the DEIS: the socioeconomic and the special forest products analyses. We have done extensive research on both of these aspects of land management in the Pacific Northwest during the past 15 years and are well-positioned to provide a constructive critique of these portions of the DEIS. Additionally, Institute for Culture and Ecology's social scientists did much of the field research for and co-authored the Northwest Forest Plan Socioeconomic Assessment, two volumes of which are referenced in the DEIS.

We would first like to commend the drafters of this plan for including a section on special forest products. Despite the flaws in this section, it is heartening to see that the BLM recognizes that these products are a part of western Oregon's forest economy and need to be included in the agency's planning processes. We would also like to acknowledge that addressing the social impacts of land use management adequately is a difficult challenge. As you revise the plan's socioeconomic impact analysis, we encourage you to consult with organizations such as the Institute for Culture and Ecology that are recognized in the scientific community as having social science skills and expertise.

Thank you for providing us the opportunity to review and comment on this plan.

Sincerely,

Rebecca J. McLain, Ph.D.
Senior Social Scientist

Eric T. Jones, Ph.D.
Manager and Anthropologist

1) Socioeconomic Description and Analysis Sections

The plan uses the term "socioeconomic" but it deals almost exclusively with economics and hardly at all with either the social aspects of the planning context or the social impacts of the different alternatives. It also has limitations as an economic analysis. Some particularly striking gaps and inaccuracies in the DEIS are:

Inaccurate representation of the importance of timber jobs in western Oregon's economy: The majority of the socioeconomic impact analysis section is devoted to an analysis of the impacts of the different alternatives on the region's timber economy. This leaves the false impression that timber is still a major economic driver in western Oregon. The economic analysis needs to emphasize far more than it does that timber related work provides only a small percentage of the total number of jobs available in all of these counties. Even the number of other jobs dependent on timber production in most of these areas is now relatively minor.

To provide proper perspective of the relative importance of the timber economy, the section needs to prominently include a chart that shows the total number of jobs in each county, the net loss/gain in jobs for each alternative, and the percentage of total jobs (by county and for the region) that that net/loss gain represents. Such a chart will place the numbers in perspective as to the actual implications of the net losses and gains under each alternative. For example, a loss of 500 jobs is significant if the total number of jobs in a county is 5000, it is much less significant if the total number of jobs in a county is 50,000, and it is a mere blip on the screen if there are 500,000 jobs.

Providing this information and highlighting it so that it isn't lost among the details is essential for determining whether the increase (or decrease) in number of jobs is actually worth the environmental impacts (or lack of impacts) associated with each alternative.

Inadequate analysis of recent and projected demographic shifts in this area. In-migration of retirees and persons employed in the service and professional sectors is probably the single biggest driver of social and economic change in rural western Oregon at this time. Yet the socioeconomic sections barely touch on the issue of demographic change and its ramifications for land management (and in particular likely social acceptance of the different alternatives).

It would be helpful if these sections provided a sense of the magnitude of the demographic changes taking place in the region, a sense of the variation across counties and within counties, a couple of pages of discussion about how in-migration patterns are likely to affect demand for various types of stand structures, types of recreational infrastructure, opposition to and support for the different alternatives, etc, and (in the impacts section) a discussion of how the different alternatives are likely to affect communities differently depending on their demographic characteristics.

In addition to expanding both the socioeconomic context and socioeconomic impact analysis sections to include such a discussion, the authors also need to include references to the appropriate scientific literature on amenity values migration, the expanding role of Latino immigrants in the forest sector labor force (and thus the environmental justice ramifications of the various alternatives), and the implications of projected demographic shifts for western Oregon's social and cultural dynamics (of relevance to land management).

Inadequate time depth for county payments analysis: The county payment chart in the socioeconomic impact analysis needs to go back much farther in time. It would provide a much more accurate reflection of historical trends in the BLM's economic contribution to county budgets via county payments if it were traced back to the year that county payments began instead of starting in mid-1980s, a time when timber harvest levels in western Oregon were abnormally high.

Need for social science expertise on the Science and ID-EIS Teams: The lack of social analysis in the DEIS is likely attributable to the absence of social scientists on the teams charged with preparing this analysis. The Science Team, for example, does not include a social scientist. Yet value conflicts and significant changes in the social composition and dynamics of western Oregon in the latter part of the 20th century were the major impetus for the Northwest Forest Plan. They also are the primary reason the Bureau of Land Management has been unable to offer the volumes of timber that the drafters of the NWFP had envisioned over the past 13 years. Good understandings of social issues and how they affect land management are critical to developing land management plans that can be implemented. It is critical that the BLM appoint a qualified social (i.e. cultural anthropologist, cultural geographer, natural resource sociologist, etc.) to the project team charged with revising the DEIS. Without such expertise on the team, it is doubtful that the final plan will have a better chance of being implemented than the Northwest Forest Plan.

The Interdisciplinary and EIS Team appears to have a similar lack of social science expertise (with the exception of an archeologist). The team's economist appears to have been in charge of the socioeconomic sections, which may explain the focus on economic analysis and the lack of social analysis. The quality of the socioeconomic analysis section for the FEIS would be greatly improved by expanding the ID and EIS Team to include a social scientist with a strong background in the Pacific Northwest's contemporary social dynamics.

Need to draw from a broader set of scientific literature: The only social science studies that the DEIS draws on are studies funded by the Forest Service or produced by Forest Service scientists. While we do not question the quality of these studies, many other studies do exist. One would expect that an EIS that is the object of such intense scrutiny and that has such extensive socioeconomic ramifications would include studies from a wide range of sources.

2) Special Forest Products

While we commend the BLM for including a special forest products section, the quality of the analysis needs improvement.

Analysis lacks the necessary specificity: A key problem with the special forest products analysis is that the authors treat special forest products as one generic category rather than acknowledging that variation exists across products and, equally important, that variation exists across species for the same types of products. For example, the authors make generalizations throughout the section about "floral greens", "wild mushrooms", "moss," treating them as if each of those categories consisted of one species, instead of the numerous species which comprise these product categories.

Another example occurs on p. 591, where the authors state, "Thinning would disturb the forest floor but would retain conifer host species and allow mushrooms to recover and fruit within approximately 5 to 10 years after harvesting." This statement leads the reader to assume that the

5-10 year recovery period is valid for all mushroom species when the article cited to support this statement is only about chanterelles, and it only deals with specific types of thinning in specific types of forest stands. The problems in this section are compounded by the authors' tendency to treat all stand treatments generically as well. This glosses over the differences in impacts that different types of thinning or other vegetation management practices will have on a given plant or fungal species.

In revising this section, the authors need to take care to specify which species they are talking about and what types of thinning (or other treatments) they are referring to instead of treating all mushrooms (or other special forest products) as if they were the same. Likewise the section needs to be revised so that it doesn't imply that all forms of thinning (or other treatments) will have the same ecological impacts on a given species. If insufficient data is available to assess what the impacts might be for particular species or products, that should be clearly stated.

Analysis is incorrect: The discussion on page 590 essentially says that there is no difference between the four alternatives in their impacts on special forest products and thus no impact on special forest products industries. Both of these conclusions are incorrect.

1) To say that there is no difference among the alternatives as far as the production of special forest products goes is like saying that it makes no difference if we manage the forest so that the trees are all cedar or all Douglas fir because wood is wood and mills will just shift which trees they deal with and so there will be no effects on the industry. Foresters would not support such a statement about trees and BLM planners should not be supporting such statements about SFPs.

The following real-life example is useful for illustrating why this section needs a more thoughtful analysis. Under the no-change alternative, ultimately a very large percentage of the landscape will have stand structures with much denser canopies and thus far less light reaching the understory. Under alternative 4, a very large percentage of the landscape will be in much younger stands and likely with less dense canopies and more light reaching the understory. If we think about what the impacts of these different scenarios will be on swordfern populations, ecological science tells us that swordfern will be much more plentiful in Scenario 1 than in Scenario 4. If we want to assess what some of the potential socioeconomic impacts of these differences in stand structure at the landscape scale might be, we can turn to the history of the floral greens industry on the Olympic Peninsula, which is fairly well documented.

Between 1930 and 1960, forest stand structures on the Olympic Peninsula shifted from conditions approximating the outcomes of Scenario 1 to conditions approximating the outcomes of Scenario 4 between 1930 and 1960). That shift forced the floral greens industry to shift from heavy reliance on swordfern (abundant under scenario 1 conditions) to heavy reliance on salal (abundant under scenario 2). This shift in product type had seriously negative effects on smaller scale floral greens businesses because where the sword fern market was mostly domestic; the salal market was mostly an export market. The shift to salal favored the very large companies who had the administrative infrastructure and capital needed to function competitively in the export market. Many of the smaller businesses were unable to compete and went out of business. So the change in stand structure negatively affected the livelihoods of small-scale brush shed operators. The demise of the small brush sheds meant that the large brush sheds had much greater ability to keep prices paid to harvesters low, and thus the change in stand structure eventually negatively affected the livelihoods of harvesters (many of whom had low incomes to begin with). A recent study of floral greens harvesting by Heidi Ballard, an ecologist now at UC Davis, suggests that ultimately the change in socioeconomic dynamics within the floral greens

industry (attributable in part to the change in stand structure) may have negative ecological impacts.

In revising the SFP section, clearly this sort of detail cannot be provided for each SFP industry. However, it can be revised to point out that the different scenarios likely *will* have differential impacts on SFP populations at the landscape scale as well as at the stand scale. The section should also point out that the different scenarios will also likely have differential impacts on the various participants in special forest product harvesting, processing, and trade. The section writers also need to state that for the most part we simply don't know what these impacts will be. They should then include either in this section or the monitoring section, recommendations for how the BLM can begin to develop the capacity to adequately assess what the impacts of its management actions are on special forest products and special forest products activities.

2) In a similar vein, the section does not adequately distinguish between the range of different types of people interested in SFPs. For example, the impacts of the alternatives could differ substantially for non-commercial pickers and commercial pickers. Likewise, they might have different types of impacts on harvesters of a particular type of product than they would on buyers of that same product. The authors need not go into detail but they should acknowledge that there is a wide range of people for whom special forest products are important and that the ways in which the forest is managed will, in fact, affect different types of users in different ways.

3) The section also incorrectly assumes that SFP harvesting and buying operations are infinitely mobile and that there is complete elasticity in the ability of firms and individuals to shift the types of products that they harvest or deal in. However, moving around the landscape is not cost free, and while harvesters and buyers do generally move around, there are points at which it ceases to be cost-effective to do so. Similarly, while harvesters and buyers deal in multiple products, the ability to shift across product lines is also not unlimited. The plan needs to acknowledge these points and provide some sense for which species and products are likely to be negatively or positively affected where under each of the alternatives. It should also provide some indication as to what some of the possible effects on SFP activities – commercial and non-commercial -- might be. Some example scenarios that illustrate the likely impacts of each of the alternatives on the abundance and spatial distribution of 3 commonly gathered products and estimates of how those changes might affect their associated industries would go a long ways toward making this section scientifically credible.

4) To sum up, all of the special forest products sections need to be rewritten so that the discussion more accurately reflects the best science available on the workings of special forest products industries and the variety of ways that special forest products are important to people and local economies. We provide a list below as well as an appendix of some key and readily available resources that authors can refer to when redrafting this section.

Lack of special forest products expertise on the Science and DEIS teams: It appears that the planning teams did not include any experts on special forest products, and the team does not appear to have consulted with knowledgeable specialists within the BLM, the Forest Service, the Oregon Department of Forestry, Washington DNR, or non-governmental organizations in developing the analysis. In revising this section, the team needs to locate and involve persons knowledgeable about this aspect of land management. Ideally, the team should circulate a draft of the revised section among a group of knowledgeable experts on special forest products (including economists and social scientists, as well as foresters, ecologists, and botanists) both within and outside the agency prior to final publication.

Inadequate consideration of the existing (and easily accessible) scientific literature: The special forest products analysis includes virtually no citations, an astonishing gap given that a fairly sizeable body of scientific literature now exists on special forest products in the Pacific Northwest. The section writers should consult this literature when revising the special forest products section. A few websites with relevant materials are:

> Institute for Culture and Ecology. http://www.ifcae.org/ntfp/pubs/index.html. We have posted numerous reports and links to articles on SFP issues at this site. One that might be particularly useful for the FEIS is: Lynch, Kathryn A.; McLain, Rebecca J. 2003. **Access, Labor, and Wild Floral Greens Management in Western Washington's Forests.** PNW-GTR-585. Portland: Pacific Northwest Research Station USDA Forest Service. Another key publication is: Jones, Eric T. Rebecca J. McLain, and James Weigand. eds. 2002. Non Timber Forest Products in the United States. Lawrence: University of Kansas Press.
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> Center for Nontimber Resources at Royal Roads University in Victoria, British Columbia. http://www.royalroads.ca/programs/faculties-schools-centres/non-timber-resources/. They have an extensive bibliographic database on special forest products, as well as numerous reports on various SFP industries in British Columbia. Much of their work is relevant to the Pacific Northwest; much of it has very practical implications for stand-level and landscape-level forest management. They call this "compatible" forest management (i.e. compatible with timber production).
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> U.S. Forest Service's Pacific Northwest Research Station. http://www.fs.fed.us/pnw/publications/gtrs.shtml This site has numerous scientific articles on SFPs in the Pacific Northwest. One document on this website that the authors might wish to consult is: Rebecca J. McLain, Lisa Tobe, Susan Charnley, Ellen M. Donoghue, Cassandra Moseley. 2006. Northwest Forest Plan—the first 10 years 1994–2003: Socioeconomic Monitoring of Coos Bay District and Three Local Communities. This report has a section on Coos Bay BLM's SFP program which might be helpful for providing some context for the DEIS revisions. http://www.ifcae.org/projects/nwfp/

We also recommend incorporating information on participatory biological monitoring. The EPA, USFS, and other agencies and state and local governments are increasingly involving citizens in helping to meet the difficult and costly requirements for biological monitoring. Such programs are encouraged under the President of the United States' Cooperative Conservation Initiative, Public Law 108-7. The Institute for Culture and Ecology funded by the National Commission on Science for Sustainable Forestry and published through the U.S. Forest Service produced a comprehensive guide to assist managers and scientists in creating participatory biological monitoring programs. Publications and other materials can be viewed at: http://www.ifcae.org/pbm/

Environmental Justice Analysis

We would be interested in knowing whether the Department of the Interior has a regulation similar to USDA's Department Regulation 5600-2, which expands the definition of environmental justice to include providing minority and low income populations opportunities to comment on decisions, share in benefits of, and to not be excluded from programs and activities

affecting human health or the environment. If so, the section needs to be expanded to address the expanded definition.

Socioeconomic Monitoring

The monitoring section does not mention socioeconomic monitoring. Yet virtually all of the community members interviewed during the NWFP socioeconomic assessment expressed considerable anger and frustration that the socioeconomic monitoring did not happen early on in the implementation of the Plan. Many community members and BLM and FS employees interviewed during the assessment stated that early socioeconomic monitoring with a strong communication flow to policy makers could have helped address many of the problems associated with the Plan early on in the process. We recommend that BLM add in an explicit requirement that monitoring address socioeconomic impacts of the WOPR, and that funds be allocated to have that monitoring start within a year of issuing the new plan's record of decision.

Appendix – Sample List of Scientific Publications on Special Forest Products

McLain, Rebecca; Alexander, Susan J.; Jones, Eric T. [Forthcoming]. **Incorporating Understandings of the Informal Economy in Natural Resource and Economic Development Policy: Nontimber Forest Products As A Case Example.** PNW-GTR. Portland, OR: USDA Forest Service, Pacific Northwest Research Station.

Jones, Eric T. and Kathryn A. Lynch. [In Press]. **Integrating Commercial Nontimber Forest Product Harvesters into Forest Management: Opportunities and Challenges.** In, Communities and Forest Management. Ellen M. Donoghue and Victoria Sturtevant (eds). Washington, D.C.: Resources for the Future.

Jones, Eric T. and Kathryn A. Lynch. 2007. **Biodiversity Conservation and Nontimber Forest Products.** Forest Ecology and Management. 246, 2937

Charnley, Susan J., Paige Fischer, and Eric T. Jones. 2007. **Local Knowledge and Biodiversity Conservation.** Forest Ecology and Management. 246, 14-28

Pilz, David, Heidi Ballard, and Eric T. Jones. 2006. **Participatory Biological Monitoring Guidelines.** PNW-GTR-680. Portland, OR: USDA Forest Service, Pacific Northwest Research Station.

McLain, Rebecca J. and Eric T. Jones. 2005. **Nontimber Forest Products Management on National Forests in the United States. Portland, OR: Pacific USDA FS PNW Research Station.** PNW-GTR-655.

Mclain, Rebecca J.; McFarlane, Erika Mark; Alexander, Susan J. 2005. **Commercial Morel Harvesters and Buyers in Western Montana: An Exploratory Study of the 2001 Harvesting Season.** USDA Forest Service Pacific Northwest Research Station. PNW-GTR-643

McLain, Rebecca J.n. 2004. **Bringing Wildcrafters to the International Policy Table: Reflections on the Nontimber Forest Products Side Event at the 12th World Forestry Congress, Quebec City 2003.** Prepared for the Ford Foundation's Institute for International Education. March 2004. Portland, Oregon: IFCAE. http://www.ifcae.org/projects/wfc03harv/

Lynch, Kathryn A., Eric T. Jones, and Rebecca J. McLain. 2004. **Nontimber Forest Product Inventorying and Monitoring in the United States: Rationale and Recommendations for a Participatory Approach.** Washington, D.C.: National Commission on Science for Sustainable Forestry. http://www.ifcae.org/projects/ncssf1/index.html

Jones, Eric T., Rebecca J. McLain, and Kathryn A. Lynch. 2004. **The relationship between nontimber forest products and biodiversity in the United States.** Washington, D.C.: National Commission on Science for Sustainable Forestry. http://www.ifcae.org/projects/ncssf1/index.html

Lynch, Kathryn A.; McLain, Rebecca J. 2003. **Access, Labor, and Wild Floral Greens Management in Western Washington's Forests.** PNW-GTR-585. Portland: Pacific Northwest Research Station USDA Forest Service.

Jones, Eric T. and McLain, Rebecca J. 2003. **The Importance of an Integrated Research Approach**. In, Understanding Community Forest Relations. Editor: Linda Kruger. PNW-GTR-566. Portland, Oregon: Pacific Northwest Forest Sciences Lab.

Jones, Eric T.; McLain, Rebecca and Weigand, James. eds. 2002. **Non Timber Forest Products in the United States**. Lawrence: University of Kansas Press.

Jones, Eric T. and Lynch, Kathryn A. 2002. The Relevance of Sociocultural Variables to Nontimber Forest Product Research, Policy and Management. In, Jones, Eric T.; McLain, Rebecca and Weigand, James. eds. 2002. **Non Timber Forest Products Management and Policy Issues in the United States**. Lawrence: University of Kansas Press.

Love, Thomas; Jones, Eric T. 2001. **Why is NTFP Harvesting an 'Issue'? Excluding Local Knowledge and the Paradigm Crisis of Temperate Forestry**. Journal of Sustainable Forestry 13 (3/4):105-121. Special issue on North American non-timber forest products.

McLain, Rebecca J. and Jones, Eric T. 2001. **Expanding NTFP Harvester/Buyer participation in Pacific Northwest Forest Policy**. Journal of Sustainable Forestry 13(3/4):147-161.

Jones, Eric T. 2000. **Non Timber Forest Products: Considerations for Tribal Forestry.** In, Natural Resource Management: Merging Tradition and Technology. Intertribal Timber Council: Portland, Oregon. Pp. 245-61.

Alexander, Susan and McLain, Rebecca. 1999. **Recreational Harvest of Wild Foods on the Gifford Pinchot National Forest: Resources and Issues.** Presented and published in the Proceedings of the Society of American Foresters Annual Meeting 1999. Portland, OR.

McLain, Rebecca J. and Jones, Eric T. 1998. **Participatory Non-Wood Forest Products Management: Experiences from the Pacific Northwest, USA**. In Lund, H. Gyde; Brita Pajari, and Minna Korhonen (eds.). Sustainable Development of Non-Wood Goods and Benefits from Boreal and Cold Temperate Forests. Proceedings of the International Workshop, Joensuu, Finland. 18-22 January 1998. European Forest Institute Proceedings No. 23.

Love, Thomas; Jones, Eric T. and Liegel, Leon. 1998. **Valuing the Temperate Rainforest: Wild Mushrooming on the Olympic Peninsula Reserve**. Ambio Special Report Vol. 9.

Liegel, Leon; Pilz, David; Love, Thomas and Jones, Eric T. 1998. **Integrating Biological, Socioeconomic, and Managerial Methods and Results in the MAB Mushroom Study**. Ambio Special Report Vol. 9.

McLain, Rebecca J.; Jones, Eric T. and Liegel, Leon. 1998. **The MAB Mushroom Study as a Teaching Case Example of Interdisciplinary and Sustainable Forestry Research**. Ambio Special Report Number 9:34-35.

Love, Thomas; Jones, Eric T. 1997. **Grounds for Argument Local Understandings, Science, and Global Processes.** In, Special Forest Products Harvesting. In, Special Forest Products Biodiversity Meets the Marketplace. Nan Vance (ed). USDA Forest Service General Technical Report. GTR-WO-63. Pp. 163-85.

McLain, Rebecca J.; Jones, Eric T. 1997. **Challenging 'Community' Definitions in Sustainable Natural Resource Management The Case of Wild Mushroom Harvesting in the USA.** Gatekeeper Series No. 68. IIED Sustainable Agriculture Programme.