OREGON CHAPTER OF
THE WILDLIFE SOCIETY
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March 20, 2026

TO: Bureau of Land Management Oregon/Washington Portland State Office
FROM: The Oregon Chapter of The Wildlife Society
Subject: Notice of Intent To Revise Resource Management Plans for Northwestern and Coastal Oregon and Southwestern Oregon in Oregon/Washington and Prepare an Associated Environmental Impact Statement. Project Number DOI-BLM-ORWA-0000-2026-0001-RMP-EIS

Dear Acting Director Prill:

The Oregon Chapter of The Wildlife Society (ORTWS) appreciates the opportunity to provide comments on the Notice of Intent To Revise Resource Management Plans for Northwestern and Coastal Oregon and Southwestern Oregon in Oregon/Washington and Prepare an Associated Environmental Impact Statement (91 FR 8017, February 19, 2026). ORTWS represents over 500 wildlife professionals from many areas of public and private enterprises composed of students, scientists, educators, technicians, consultants, biologists, and land managers. These professionals in our organization dedicate their lives to managing, conserving, and studying wildlife populations and their habitats throughout Oregon.

The management plans for BLM lands in western Oregon are relatively recent and do not need to be overhauled. The current plans meet the multiple-use mandate of the BLM and allow for balance on these forests, including for recreation and for timber development.

The timber management strategies outlined in the federal register notice propose actions that violate numerous federal laws including the Endangered Species Act (ESA), Federal Land Policy and Management Act (FLPMA), National Environmental Policy Act (NEPA), Administrative Procedure Act (APA) as well as BLM's own regulations and policies to protect late successional reserves and older forest stands. We are very concerned that the proposed revision is seeking to implement actions that do not agree with the best available science regarding forest management, wildlife management and conservation, or reducing the risk of catastrophic wildfire in the Pacific Northwest. Furthermore, the planned use of the Congressional Review Act (CRA) to repeal previous, more conservation-focused RMPs is being flagged by legal experts as an unprecedented action that creates massive legal instability for existing leases and authorized activities. Please do not violate public trust and your obligation to uphold the mission of the BLM by supporting inappropriate use of the CRA.

The Federal Register notice (91 FR 8017) states that BLM is considering an action alternative intended to increase timber harvest to align with historically higher levels and to manage lands for sustained-yield timber production consistent with the maximum productive capacity of the lands. It also states that under action alternatives, streamside buffers could be as narrow as 25 to 100 feet

depending on stream type. Those are major changes with potentially significant consequences, and they require thorough analysis in the Environmental Impact Statement (EIS).

The O&C Lands Act of 1937 (O&C Act) requires timber harvest to be sustainable. The burden is on the BLM to demonstrate through analysis in the EIS that this extreme plan is sustainable. Given the incredibly compressed time frame on which this plan revision is being conducted, we are skeptical of the agency's ability to complete an adequate analysis of the environmental issues at hand. A land use plan change of this magnitude requires thoughtful analysis, especially considering hundreds of thousands of acres of burnt forests on BLM lands and improved scientific understandings of climate change, both major developments since the last time the BLM completed a planning effort. Please consider both older forests lost to fire and future impacts to forest composition from climate change in your analysis methodology.

We urge the BLM to fully analyze the potentially significant environmental impacts of any alternative that would expand logging into current late successional reserves, reduce riparian protections, or otherwise prioritize timber production at the maximum productive capacity of the landscape. We identify key impacts relevant to wildlife and forest habitat below.

- The EIS should analyze the effects of reducing or eliminating existing late successional reserves on Northern Spotted Owl habitat and on BLM sensitive wildlife, plant, and fungal species associated with older forests. The notice itself recognizes wildlife and botany as issues for analysis, and public reporting on the proposal indicates that the revision could dramatically expand the amount of timber available for logging across western Oregon BLM lands. The EIS should disclose the acreage of mature and old forest currently functioning as refuge habitat, how much of that habitat would become available for harvest under each alternative, and what that means for species persistence and habitat connectivity over time.

  Long-term spotted owl monitoring data from across the species' range document continued population declines averaging 75% or more at many study areas over the past three decades, driven by both habitat loss and barred owl (*Strix varia*) competition and displacement.[1][2] Critically, the science demonstrates that spotted owls are area-sensitive and require not only large patches of suitable old forest, but functional connectivity among those patches to support dispersal of subadults and recolonization of vacant territories.[2] Reducing late successional reserves on BLM lands would shrink and isolate habitat patches at precisely the moment when the population has the least demographic resilience. If the agency intends to use this RMP revision as a vehicle for barred owl management, it must simultaneously demonstrate through analysis that any net reduction in old-forest habitat does not accelerate spotted owl decline. The EIS should present spotted owl territory density and habitat association data for BLM lands under each alternative and model the cumulative effect of harvest combined with ongoing barred owl displacement on local population viability.

- The EIS should analyze the effects of shrinking riparian protections on water quality, stream temperature, sediment delivery, and recruitment of large wood to streams. NOAA materials for Oregon Coast coho recovery identify riparian protection, increased large wood

[1] Dugger et al. 2016. https://doi.org/10.1650/CONDOR-15-24.1
[2] Franklin et al. 2021. https://doi.org/10.1016/j.biocon.2021.109168

recruitment, and protection of high-quality habitat as important recovery actions, and NOAA's recent coho review notes the importance of riparian areas, water quality, and off-channel habitat. Reduced riparian reserves could therefore harm habitat conditions for coho salmon, steelhead, cutthroat trout, and other aquatic species[3].

The proposed streamside buffers of 25–100 feet are substantially narrower than the buffers supported by riparian science for maintaining stream temperature, bank stability, and large wood recruitment in Pacific Northwest streams.[4] [5] For coho salmon (*Oncorhynchus kisutch*), the Oregon Coast Evolutionarily Significant Unit is listed as threatened, and NOAA's most recent five-year review identified riparian condition and in-stream wood as primary limiting factors for recovery. Given that BLM lands include headwater drainages that disproportionately influence downstream habitat quality across privately owned working forest landscapes, degradation of riparian function on O&C lands could undermine coho recovery investments occurring across the broader watershed. The EIS should model cumulative watershed effects, not just direct buffer footprints, and should evaluate stream temperature, fine sediment delivery, and wood recruitment budgets under all alternatives using current best available hydrologic science.

- The EIS should analyze the interaction between this proposed plan revision and wildfire, recent burned acreage, and climate change. The notice cites wildfire and forest health as part of the purpose and need, but that cannot justify broad logging of mature forests without a scientifically rigorous comparison of short- and long-term effects.

  In fact, harvest of old, large trees during the 20th century has predisposed current forests to severe wildfire, drought, and insect/disease outbreaks[6]. Converting late successional and old growth forests to maximum sustained yield will increase the wildfire risk to Oregonians, particularly residents in rural areas.

  Because large areas of forest have already been altered by fire, and climate change is changing disturbance regimes, the EIS should disclose how much suitable mature and late successional habitat remains, how much has already been lost or degraded, and whether additional logging in those forests is compatible with long-term watershed protection, habitat resilience, and sustained ecosystem function. Converting areas that are currently late-successional forest to timber production will increase, rather than reduce wildfire risk for lands in western Oregon placing communities, particularly rural communities, at great risk from catastrophic wildfire.

- The EIS should evaluate impacts to Areas of Critical Environmental Concern and explain whether any currently designated ACECs, candidate ACECs, or adjacent lands would be affected directly or indirectly by increased harvest, road use, altered hydrology, sedimentation, edge effects, or fragmentation. The project page identifies a long list of currently designated ACECs in the planning area, and the agency should not treat those values as peripheral to the revision.

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[3] https://media.fisheries.noaa.gov/2021-12/final-north-coast-stratum.pdf
[4] Reeves et. Al. 2011. https://doi.org/10.1080/00028487.2011.572003
[5] Isaak et al. 2022. Climate Change Vulnerability and Adaptation in Southwest Oregon (2022): 99.
[6] Hessburg et al. 2022. doi:10.1002/fee.2408

- The EIS should analyze recreation and quality-of-life impacts with the same seriousness given to timber outputs and county revenue. NEPA policy now requires agencies to consider the effects of actions on the "quality of life of the American people. Public lands in western Oregon provide some of the last widely accessible mature and structurally-diverse forests for hiking, hunting, mushroom foraging, wildlife viewing, paddling, and quiet recreation. If these forests are converted to more intensively managed timber landscapes, that would reduce the recreational, scenic, and experiential value of these lands to Oregonians and visitors alike. The Federal Register notice specifically lists recreation, visual resources, socioeconomics, fisheries, hydrology, soils, wildlife, and ACECs among the issues for analysis, and the EIS should fully quantify losses to recreation access, tourism value, and nonmarket public benefits, not just timber revenue.

  Private, intensively owned industrial timber forest covers much of this state and is of poor quality for most kinds of recreation. Forests on public land are some of the only mature, diverse, openly spaced forests left. These are places where people go to hike, hunt, forage for mushrooms and other forest products, and enjoy nature. Being able to access mature forests on public lands is one of the major reasons that people enjoy living in Oregon. Loss of opportunities to hike, hunt, and forage would have a major impact on quality of life for people from all walks of life and political orientations. Please consider these negative effects with equal weight and with similar units of measure and methods of analysis to any purported economic benefits from this plan.

  In that vein, the EIS needs to consider how this plan would impact recreation tourism and recreational industries. Numerous studies have shown that recreation is a major component of rural economies. Planning to cut the forests where people go to hike, hunt, paddle, climb, fish, bike, and forage could have negative effects on rural county tax revenues and these impacts should be quantified, disclosed, and considered in decision making.

The notice of intent for this plan suggests that the BLM will be considering only one action alternative, which would "provide a sustained yield of timber production consistent with the maximum productive capacity of the lands." This is the extreme end of a range of possible alternatives that the BLM should consider in this planning effort. The BLM needs to consider an alternative in which timber production is balanced with habitat conservation and recreation. The BLM also needs to consider a “no action” alternative or continuing to manage these lands under the BLM’s 2016 Western Oregon RMPs.

The following are suggested alternatives for detailed analysis:

- Limit regeneration harvest to stands younger than 80 years old.
- Exclude from harvest any stands containing old-growth characteristics, occupied or likely habitat for sensitive old-forest species, unstable or fragile soils, or areas where harvest would degrade aquatic habitat.
- Maintain riparian buffers of at least 300 feet on fish-bearing and ecologically sensitive streams and wider buffers where needed for slope stability, shade, and large wood recruitment.

- Treat all forests older than 80 years, and all existing late successional reserve areas, as protected late successional habitat.
- Prioritize restoration thinning only where it is clearly justified by site-specific ecological objectives and does not reduce mature forest structure, canopy complexity, or stream protection.
- Analyze recreation, scenic, carbon-storage, watershed, and biodiversity values alongside projected timber outputs and county payments.

Alternative(s) including these components would still allow timber production from younger stands while preserving the mature and old forest values that are far harder to replace once lost. It would also better align with the O&C Act's broader purposes of watershed protection, streamflow regulation, and recreation, rather than treating the landscape primarily as a maximum-yield timber base.

We also note that the interdisciplinary team identified in the Federal Register notice does not include a soils scientist, hydrologist, or botanist among the listed disciplines, and lists only five specialist areas for a 2.46-million-acre revision affecting dozens of sensitive species and over 80 designated ACECs. The Association of Fish and Wildlife Agencies and Wildlife Society's position on best practices in wildlife management planning consistently calls for adequate staffing of interdisciplinary teams with expertise commensurate with the scope of analysis.[7] ORTWS recommends that the BLM explicitly identify the full complement of technical specialists contributing to the EIS and ensure that wildlife, botany, hydrology, and soils expertise are robustly represented, not treated as peripheral to the timber production analysis.

Finally, because this revision is being advanced on a compressed timeline and involves sweeping changes across approximately 2.46 million acres, the EIS must be especially careful, transparent, and scientifically grounded. The agency should not rely on generalized assertions that more logging is needed. It should disclose the data, assumptions, modeling methods, habitat tradeoffs, and uncertainty behind each alternative, especially where listed species, riparian systems, mature forest structure, recreation values, and ACECs are concerned.

Please include these comments in the scoping record and fully analyze the alternative described above in the EIS.

Sincerely,

Conservation Affairs Committee,
Oregon Chapter of The Wildlife Society

[7] Association of Fish and Wildlife Agencies and The Wildlife Management Institute. 2019. Fish and Wildlife Relevancy Roadmap: Enhanced Conservation Through Broader Engagement (v1.0). M. Dunfee, A.Forstchen, E. Haubold, M. Humpert, J. Newmark, J. Sumners, and C. Smith. 2019 (eds). AFWA. Wash.
D.C. 128 Pages.