American Bird Conservancy

Bold action for birds across the Americas

March 23, 2026

VIA BLM E-PLANNING PORTAL
https://eplanning.blm.gov
Project Number DOI-BLM-ORWA-0000-2026-0001-RMP-EIS
Email: BLM_OR_Revision_Scoping@blm.gov

Re: Comments on Bureau of Land Management's 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.

Dear Friends,

Please accept these comments on behalf of American Bird Conservancy (ABC), which works to conserve birds and their habitats throughout the Americas. ABC has participated in the Bureau of Land Management's (BLM) Western Oregon planning process since 2007. ABC has a particular concern and interest in the recovery of the threatened Marbled Murrelet and Northern Spotted Owl, and recommend that the Bureau of Land Management halt its plans to revise the Oregon Resource Management Plans, and to prepare an associated Environmental Impact Statement.

Any amendment should focus on recovering the Northern Spotted Owl, Marbled Murrelet and salmon stocks in the region suffering from insufficient late-successional habitat. That includes protecting all stands and large trees over 80 years in age, prohibiting post-disturbance salvage logging in the reserves, and increasing logging buffers in occupied Marbled Murrelet habitat to reduce forest fragmentation, and the resulting nest predation of murrelet chicks.

The most significant change requiring a plan amendment is the 2012 Northern Spotted Owl Critical Habitat Rule that protects approximately 40% of the Northwest Forest Plan's matrix or areas the Plan had slated for logging. This change included BLM managed plThis substantial amount of added habitat protection should be incorporated into any BLM plan amendment alternatives.

A loophole to be closed is post disturbance logging within late-successional forests. There is overwhelming scientific evidence that post-disturbance logging inhibits natural forest regeneration, emits substantial carbon, pollutes streams with sediment runoff, damages soils, and increases future fire risks.

The amendment could also boost Marbled Murrelet recovery that is being hindered by high rates of nest predation. Doubling the current murrelet buffers from ¼ mile from the nest to a ½ mile would ensure a higher degree of protection for the chicks.

Added Measures Need to Recover the Threatened Marbled Murrelet

The murrelet's recent five-year status review confirmed its threatened status and found that its breeding success rate is so low that future population declines are likely. Washington's murrelet population is significantly decreasing. Here are excerpts from the review:

> Reproductive success, or productivity, is low for murrelets within the listed range.
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> Each of these estimates is well below the level thought to be necessary to maintain a stable population;
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> Even the lower end of these ranges is substantially higher than estimates of productivity for any of the conservation zones. Although estimates obtained from telemetry studies and uncorrected juvenile ratios are prone to underestimation, the magnitude of difference between observed rates and required rates indicates that the murrelet reproductive rate is likely insufficient to maintain stable population numbers throughout all the species' listed range. (Page 4)
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> Timber harvest is the leading attributable cause of nesting habitat loss in each of Conservation Zones 1 through 4, and accounts for approximately 71 percent (63,065.1 ha; 155,837 acres) of gross nesting habitat loss across Conservation Zones 1 through 5, with the majority of losses occurring on nonfederal lands (Lorenz et al. 2021, pp. 33, 43-44) (page 7)
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> Predation affects murrelets via direct mortality, whether through nest predation in coastal forests or through adult and juvenile predation inland or at sea (Nelson and Hamer 1995, p. 93). Studies across the species' listed range indicate that nest predation is a limiting factor on murrelet populations (Nelson and Hamer 1995, p. 93; McShane et al. 2004, p. 2-16; Piatt et al. 2007, p. 22), and several studies have identified nest predation as the leading cause of nest failure for murrelets
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> Across the range, measures of nesting attempts, nesting success, and overall fecundity are well below what is required to maintain the stable population size, indicating that low productivity continues to limit recovery. Mortality of fledged juveniles, subadults, and adults also likely contributes to the overall failure of murrelet recovery following listing.

Recovering the Marbled Murrelet benefits other wildlife and local economies that depend on Northwest Forests. Protection of old-growth forest habitat leads to cleaner air and water and supports tourism, recreation, and commercial fishing industries many communities rely on. Achieving this requires maintaining the protections of the Northwest Forest Plan which will increase the number old-growth trees over time. In regard to the BLM-managed lands, we

recommend they return to the Northwest Forest Plan framework with added protections for mature forests and to reduce fragmentation.

Nest predation has been found to be a limiting factor in the murrelet's population growth. To reduce forest fragmentation which facilitates nest predation, increased protective buffers are needed around nests. Nest predation also increases when human visitors leave food scraps behind at recreation sites. In 2024, ABC conducted surveys for corvids (ravens, jays, and crows) in four National Forests in Oregon and Washington. Results showed elevated densities of these nest predators in campgrounds and day-use picnic sites.

Washington, Oregon, and California have lost between 80-95% of their historic old-growth forests. Monitoring reports for the Northwest Forest Plan reveal that it is working as intended to grow back the late-successional forests needed to recover the threatened Marbled Murrelet and Northern Spotted Owl. The protection and regrowth of old growth forests is also producing many side benefits in terms of clean drinking water supplies, world-class recreation, and a natural climate solution by absorbing carbon.

For Recovery Marbled Murrelets need:

- Old-growth trees for nesting - they do not build nests, so wide, flat branches are imperative. The Northwest Forest Plan and BLM Oregon RPM protect old growth forests, however the only the NW Forest Plan provides for reserves to increase the amount of old growth over time. BLM needs to reestablish reserves and conserve areas of mature forest to provide for added old growth habitat in the future.
- Habitat buffers around nesting habitat - forest fragmentation allows nest predators easy access to nests, so larger patches of trees need to be restored as provided for by the Northwest Forest Plan's late-successional reserves. The BLM checkerboard poses are major challenge due to the intensity and amount of fragmentation created by the private land squares. We recommend managing the federal squares as reserves to compensate and provide for unfragmented areas needed by the Marbled Murrelet and other wildlife.

Pacific Seabird Group Comment

We endorse the comment submitted by the Pacific Seabird Group which identified the importance of habitat found in 30 Areas of Critical Environmental Concern, other key problems with the proposed plan, and useful recommendations supporting recovery. These include:

> Timber harvest in occupied sites causes direct harm to murrelets given the species' need for large lateral branches that are not found in other forest types and the majority of potential habitat available.
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> Therefore, the BLM must consult with the U.S. Fish and Wildlife Service to ensure that Marbled Murrelet Critical Habitat is not destroyed or modified as a result of RMP-sanctioned activities. An appropriate consultation will identify all Areas of Critical Environmental Concern (ACECs) that contain or are adjacent to Marbled Murrelet Critical Habitat, or have

records of murrelet presence, and remove those areas from potentially damaging RMP-sanctioned activities.

Identification and preservation of all high quality and suitable nesting habitat including known nest sites or occupied sites that fall within or outside of the Critical Habitat boundaries will allow BLM to avoid take of murrelets and comply with the ESA.

Seek to create and maintain large, contiguous areas of murrelet habitat. Effects to murrelets due to hard edges decrease in larger, more circular areas of habitat;

When harvesting timber adjacent to occupied habitat and buffers, avoid or reduce negative effects to murrelets or their habitat by minimizing the extent of hard edge present at any given time.

Importance of BLM-managed forests for Northern Spotted Owl Recovery

The 184,000 acres of Bureau of Land Management-managed lands originally proposed for critical habitat exclusion in 2021 are extremely important for the survival of the spotted owl for two main reasons:

There exists very little suitable habitat on non-federal lands. In fact, about 85 percent of remaining suitable spotted owl habitat can be found on federal lands.

BLM lands provide essential habitat connectivity for owl populations moving between the Coast Range, Cascades, and Klamath/Siskiyou Mountains. Without this connectivity, it is highly likely to reduce the chances of spotted owls moving among these provinces, and preventing genetic isolation and degradation of the owl population.

We therefore recommend that BLM prioritize protection of all current suitable habitat in the harvest land base because the landscape is still suffering from severe fragmentation that occurred before the spotted owl was added to the endangered species list. Until sufficient large blocks of habitat have recovered from past logging, conservation of the suitable Spotted Owl habitat in the Harvest Land Base remains critically important.

The presence of Barred Owls makes the protection of old-growth forest habitat even more important. There are hundreds of thousands of acres of suitable habitat that was assumed to be available to the Spotted Owl, but it's not available, because that habitat is occupied and defended by highly territorial Barred Owls. Every acre of owl habitat removed by logging under this proposal reduces the chances of co-existence and increases the chances of competitive exclusion.

Compounding Factors Point to Need for Greater Protection of Mature and Old-Growth

Several policy developments, proposed changes to NEPA regulations, and Secretarial Orders mandating increased resource extraction, raise concern that public concerns, compliance with the law, and best available science will no longer guide forest policy. These changes indicate that

added forest protections are needed to ensure that other forest values, such as wildlife habitat, recreational opportunity, and clean water supplies are not sacrificed.

Earthjustice Comment Reveals Fundament Flaws

ABC strongly endorses the coalition letter submitted by Earthjustice that identifies numerous deficiencies in the current notice as well as previous plan revisions. These include a number of points that strike at the heart of the proposal, and strongly support our recommendation to halt the plan revision altogether:

> BLM cannot legally return to the harvest levels of 60 years ago. Those unsustainable harvest levels ignored clean water, threatened and endangered species, and science-based ecological forestry principles, existed in a different climate with lower fire risks, and prioritized short-term financial gains over long-term community health and resilience.
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> BLM also discusses its desire to harvest more green and salvage timber due to wildfires. Rather than reducing fire risk, BLM's proposal to return to one billion board feet volumes will exacerbate wildfires through increased commercial logging and deepen environmental harm with salvage logging that harms an already fragile ecosystem. In 2022, BLM wrote about its fire and fuels management that "progress is being made across all treatment types in the fires and fuels program."[1] BLM also explained that its modeling for the 2016 RMPs showed minimal effects to the long-term allowable sale quantity from simulated wildfires, and that evaluation after two fires in the early days of the RMPs agree with the minimal effects on timber determination.[2] BLM then analyzed each sustainable yield unit to determine whether to change allowable sale quantity, based primarily on fire, and did not recommend any changes.[3]

Thank you for considering these comments.

Sincerely,

Steve Holmer
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[1] BLM Resource Management Plan Evaluation Report (March 2022) at 25.

[2] *Id.* at 13.

[3] *Id.* at 13–16.