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TO: Interested Parties
FROM: Andy Kerr
RE: Definitions of Mature and Old-Growth Forest in Western Oregon Bureau of Land
Management Resource Management Plans.
DATE: 14 February 2023

***Top Line:* BLM already has a definition of what is “mature” forest on its ~2.6 million acres of public forestlands in western Oregon, yet it is reinventing the wheel with the Forest Service in response to the president’s executive order to conserve mature and old-growth forests.**

President Biden’s Executive Order (EO) [14072](#) (“Strengthening the Nation’s Forests, Communities, and Local Economies”) directs the USDA Forest Service and USDI Bureau of Land Management (BLM) to “develop policies . . . to institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forests on Federal lands.”

This memorandum does not address the unspeakable acts BLM is doing to mature and old-growth (MOG) forests in western Oregon, but rather only focuses on the MOG definitions used in the plans.

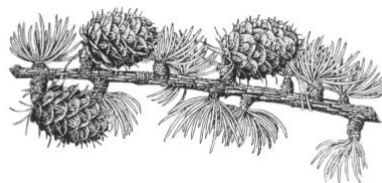
In 2016, the Bureau of Land Management (BLM) issued two records of decision/resource management plans (RODs/RMPs) that revised BLM resource management plans (RMPs) for its ~2.6 million acres of federal public forestland in western Oregon. The two RODs/RMPs are: [Northwestern and Coastal Oregon ROD/RMP](#); and [Southwestern Oregon ROD/RMP](#). One result is the withdrawal of BLM lands from the Northwest Forest Plan.

The NW&CO ROD/RMP encompasses primarily (but not exclusively) “**moist**” forest types. It covers entirety of the Coos Bay and Northwest Oregon (formerly Eugene, and Salem) Districts, as well as Swiftwater Field Office of the Roseburg District. The SWO ROD/RMP encompasses primarily (but not exclusively) “**dry**” forest types. It covers the entirety of the Medford District, the South River Field Office of the Roseburg District, and the Klamath Falls Field Office of the Lakeview District. Both RODs/RMPs tier to the “[Proposed Resource Management Plan/Final Environmental Impact Statement: Western Oregon](#)” (2016).

Table 1 lays out the BLM forest structural stages for Western Oregon.

BLM chose to dwell on structure (tree age, numbers, and sizes) until a stand is at least two centuries old, when BLM uses age definitions. “Developed-Structurally Complex” is in fact “old growth” to any self-respecting native wildlife and most people that look at such a forest. Since the agency knew it had lost its social license to log “old growth,” BLM played games by narrowing defining “old growth.”

| Structural Stage Classification* | Moist Forests | Dry Forests |
|--|---|---|
| 1. Early Successional | forests that are ≤ 30 years old, with < 30 percent canopy cover | forests that are ≤ 50 years old, with < 30 percent canopy cover. |
| 2. Stand Establishment | forests that are ≤ 30 years old, with ≥ 30 percent canopy cover. | forests that are ≤ 50 years old, with ≥ 30 percent canopy cover. |
| 3. Young | forests that are over 30 years old, with < 24 trees per acre ≥ 20 inches diameter at breast height. | forests that are over 50 years old, with < 12 trees per acre ≥ 20 inches diameter at breast height. |
| 4. Mature | forests that are over 30 years, with ≥ 24 trees per acre ≥ 20 inches diameter at breast height. | forests that are over 50 years, with ≥ 12 trees per acre ≥ 20 inches diameter at breast height. |
| 5.1 Developed Structurally-complex | forests that are over 30 years old, ≥ 24 trees per acre that are ≥ 20 inches diameter at breast height, and ≥ 4.7 trees per acre ≥ 40 inches diameter at breast height. The coefficient of variation of tree diameters over 10 inches ≥ 0.35 | forests that are over 50 years old, ≥ 12 trees per acre that are ≥ 20 inches diameter at breast height, and ≥ 2.1 trees per acre ≥ 40 inches diameter at breast height. The coefficient of variation of tree diameters over 10 inches ≥ 0.34 . 5.2 |
| 5.2 Existing Old Forest | Stands currently ≥ 200 years old, but < 400 years old. | |
| 5.3 Existing Very Old Forest | Stands currently ≥ 400 years old. | |
| * <i>Structural stage classification.</i> “Forest stand classification system based on quantitative stand metrics used to evaluate changes in forest conditions through time.” | | |
| Source: USDI Bureau of Land Management. 2016. “Proposed Resource Management Plan/Final Environmental Impact Statement: Western Oregon.” Glossary (pages 1080 and 1081) | | |



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