



SOCAN & COIN Comments Opposing the Notice of Intent to Revise Resource Management Plans for Northwestern and Coastal Oregon and Southwestern Oregon



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Introduction

I submit these comments in two capacities. First, I comment as Cofacilitator of, and on behalf of, the 2,000 Southern Oregonians who are Southern Oregon Climate Action Now (<https://www.socan.eco>). As rural and coastal Oregonians, we live on the frontlines of the impact of climate change as we experience increasing temperatures and frequency of heat waves, reducing snowpack, increasing drought frequency and extent, rising wildfire risk, rising sea level, ocean acidification and increasing flood risk. We are thus very aware of efforts at the regional, state and federal levels that are likely to mitigate these trends or accentuate them. This intended action clearly falls into the latter category. For this reason, we strongly oppose the Notice of Intent to Revise Resource Management Plans designed to increase logging on our region's BLM lands. Second, I comment as co-chair of the Consolidated Oregon Indivisible Network (COIN <https://www.coinoregon.org/>) Climate, Energy and Environment Team. COIN is a coalition of over 75 local Indivisible groups throughout Oregon that cooperate and amplify their joint efforts to advance or oppose important federal and state legislation or proposals. We also engage with elected officials to promote progressive causes for the benefit of all Oregonians.

In summary, the proposal to revise Oregon BLM Resource Management Plans to increase logging is based on a misrepresentation of the 1937 O&C Act and a complete misunderstanding of regional forest ecology, especially as it relates to fire.

The 1937 O&C Act

In an effort to create the impression that timber harvest should be the management priority, when referring to the Oregon and California Railroad Lands, proponents of timber harvest often offer statements such as this by the Roseburg (Oregon) based Association of O & C Counties (AOCC undated): “The lands were to be retained and Congress required management according to principles of sustained yield...” To their credit, AOCC (undated) acknowledge, without drawing attention to it, that the more complete statement from 43 U.S. Code § 2601 decrees the lands “...shall be managed...for permanent forest production, and the timber thereon shall be sold, cut and removed in conformity with the principal [sic] 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 facilities...” (Cornell undated). It is critical to underline that the 1937 act included an array of values to be considered in the management of these forests beyond timber harvest.

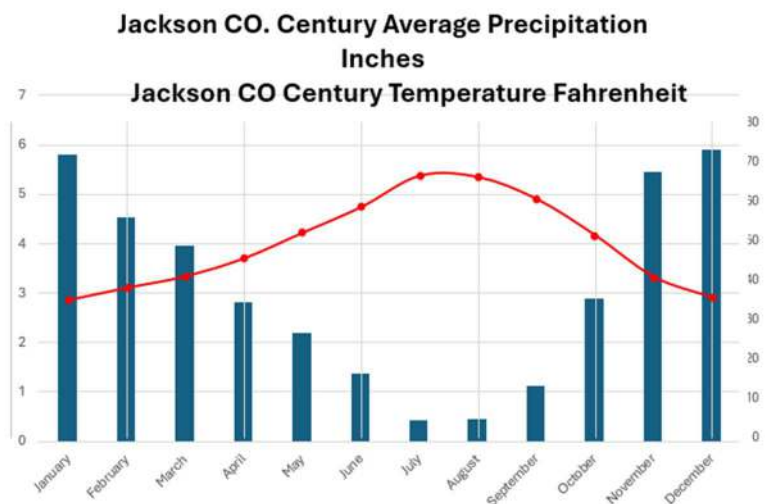
It should be clear, then, that the 1937 O&C Act does not identify timber harvest as the sole value of these forests. It is little surprise that the Federal Register entry initiates its justification for this Resource Management Plan (RMP) revision by echoing the misinformation / disinformation stated above and reporting “The purpose of the RMP revision is to seek an increase in sustained yield of timber harvest that aligns with the historically higher levels of production on BLM-administered public lands governed by the O&C Act.” Clearly this effort is couched totally in terms that are a misrepresentation of the O&C Act. The tactic seems clearly to create a false impression about the O&C Act that only those reading or researching the Act will recognize. Identifying the lack of integrity embodied in the misrepresentation will also alert the astute reader to finding other misrepresentations in the justification for this effort, some of which will be delineated below.

In addition to totally ignoring the other values that the O&C Act recognizes for our forests, the justification for the Notice of Intent To Revise Resource Management Plans continues by arguing: “Further, the BLM seeks to enhance its ability to implement forest treatments to mitigate the devastating effects of wildfire” and “This RMP revision will assist in reducing fuel loads in order to battle these unprecedented and destructive fires and will aid in keeping the American people safe.” The implicit implication in this argument is that the reason for the increasing wildfire risk in our western forests is the build-up of fuel resulting from policies that have protected the habitat of endangered species. This is the standard talking point of timber industry representatives. Unfortunately, it is a false premise that denies the evidence regarding wildfire risk in our western forests.

Wildfire in Western U.S. Forests:

Mediterranean Climate

In considering the wildfire risk facing Oregon, the first reality to acknowledge is that much of Oregon experiences a winter wet/summer dry Mediterranean Climate as depicted in Figure 1 for Jackson County (NOAA 2026a). This climate occurs in just six regions around the globe that lie between 31- and 40-degrees latitude N and S (Gildemeister undated). As Moreno et al.



*Figure 1. Mediterranean climate of Jackson County, Oregon.
Compiled by Alan Journet from data available from NOAA
2026a*

(2023) noted, “Fires are natural phenomena that historically have been part of the ecosystem in Mediterranean and semi-arid climates.” Regrettably, the historical proclivity for forests in Mediterranean climates to burn is exacerbated by global warming and its climate change consequences as NASA (2025) pointed out: “Earth’s warming climate is amplifying wildland fire activity, particularly in northern and temperate forests.”

ODF recent history of area burned and fire initiations

The recent history of area burned by wildfire in Oregon is depicted in Figure 2 from the Oregon Department of Forestry (ODF undated). This depicts over a century of fire frequency and area burned. It is evident that area burned at the beginning of the 20th century was substantial. This dropped, as did fire frequency, about the time that the U.S. Forest Service launched the Smokey Bear campaign in response to the threat of Japanese incendiary devices during the second world war (Caro 2024). The result was decades of highly successful fire suppression that allowed the buildup of dense forests comprising increased biomass (fuel). While fire suppression may seem a logical mechanism for reducing wildfire risk, in fact, as Kreider et al. (2024), among others, pointed out, there exists a ‘fire suppression paradox’ where extinguishing fires can lead subsequently to more severe fires. Thus “by putting out a fire today, we make fires harder to put out in the future.” It appears that by the final decades of the last century, the buildup of fuel due to successful fire suppression had stimulated exactly that future. The second reason for the recent increase in area burned is probably climatic. Through the 20th Century the west experienced a climate that fluctuated between conditions favorable to wildfire initiation and

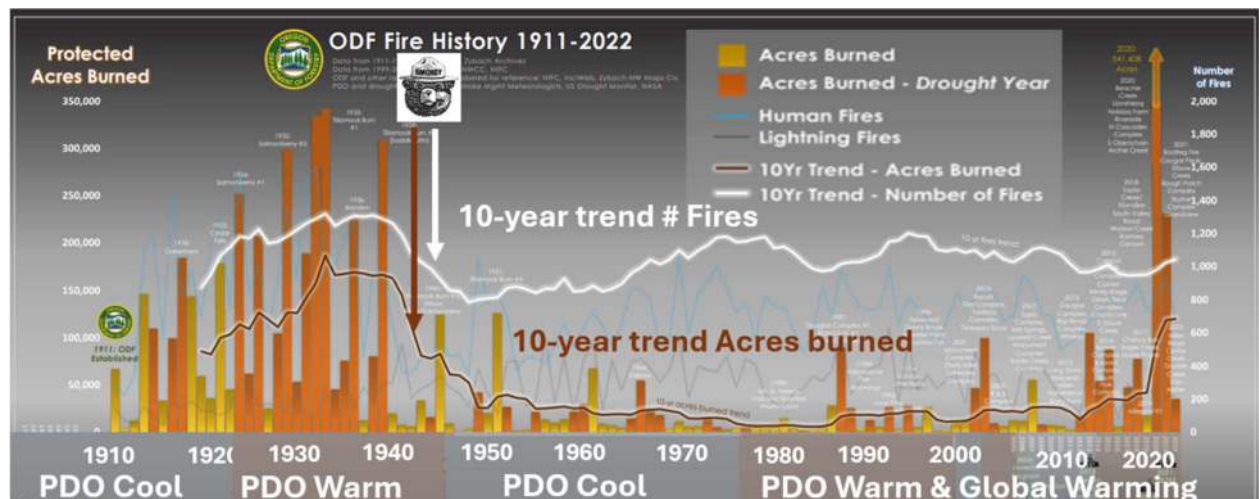
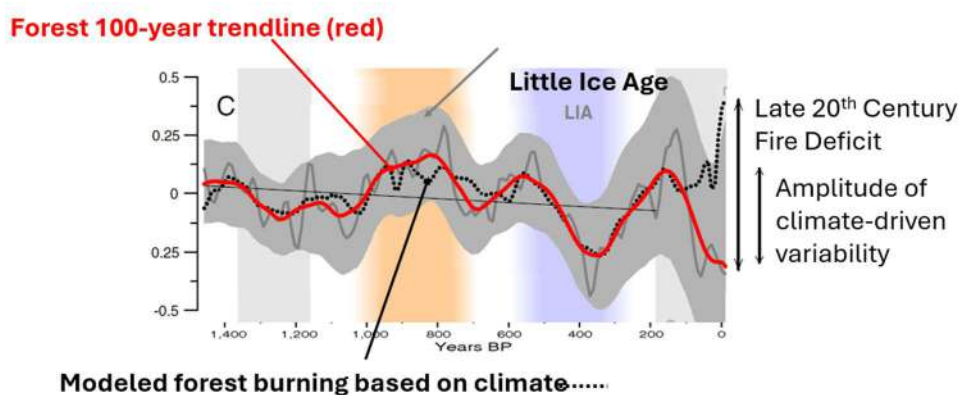


Figure 2. Area burned and fire frequency from 1911 to 2022 in forests managed by the Oregon Department of Forestry (ODF undated, modified by Alan Journet).

spread as it passed through warm dry phases, and unfavorable as it passed through cooler moister phases. These transitions were driven by the Pacific Decadal Oscillation (PDO) as depicted by the Oregon Department of Forestry (Figure 2). Over more recent decades, the PDO has been superseded in its influence by global warming which, since the 1970s/80s (see climate discussion below) has imposed on the region a climate making it increasingly susceptible to wildfire spread once fire is initiated. As a result of this combination of circumstances, we have experienced a trend towards megafires, a trend most obvious in the horrendous fire year of 2020 when the Almeda fire destroyed over 2500 homes and wrecked the lives of numerous families in Southern Oregon (JPR 2021).



Modeled forest burning based on climate.....

Figure 3. Historic correlation between Climate and area burned in western forests. Marlon et al. 2012)

relationship going back some 3,000 years with a focus on the last 1400 years (Marlon et al. 2012, Figure 3). Regrettably, this same study shows that the western states are now experiencing a profound fire deficit. This means that according to recent climatic conditions, we should be experiencing far greater area burned annually than is the case. The evidence suggests

A thousand and more years of fire

On possibly a more disturbing note, a 2012 study that related area burned to climatic conditions demonstrated a marked correlation between climatic conditions and area burned by fire, a

that climate change is now the dominant force promoting the recent increasing fire risk we are experiencing.

Regional temperature trend and projections

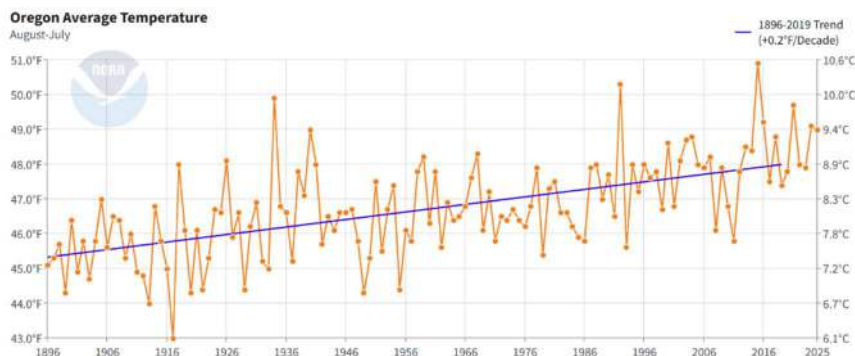


Figure 4. Temperature rise in Oregon since 1895, NOAA 2026b)

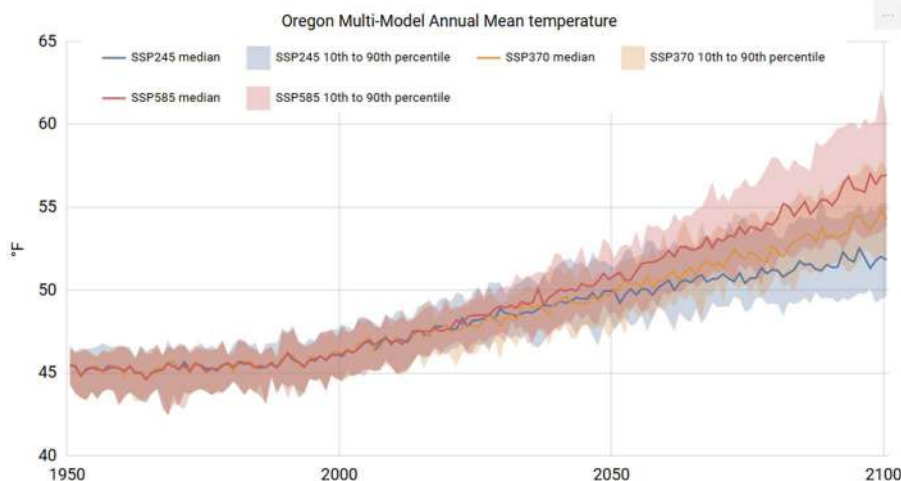


Figure 5. Temperature projection in Oregon to 2100, USGS 2026)

The recent temperature trend in Oregon has exhibited a clear rise during the last century (Figure 4, NOAA 2026b), increasing at the rate of 0.2°F per decade, but most notably since the 1980s

Figure 5 depicts the projected temperature trajectory for Oregon according to three scenarios developed by the Intergovernmental Panel on Climate Change (USGS 2026). In this assessment, the red line depicts the Shared Socioeconomic

Pathway 585 (SSP585) which initially was defined as the ‘worst case scenario’ but has frequently been dubbed the ‘business as usual’ scenario since we seem to be following it. The pink shading indicates the 10th to 90th percentiles for this line. Meanwhile, the orange line represents the SSP370 scenario with orange shading the 10th to -90th percentiles and the blue line indicates SSP245 with blue shading again representing the 10th to 90th percentile range. The latter two lines represent scenarios in which we substantially reduce the aggressive trajectory of increasing fossil fuel consumption and greenhouse gas emissions we are following. Figure 6 depicts the Oregon change in temperature from the 1950-2014 baseline and depicts a similar

trajectory to Figure 5, but as reported by Fleishman (2025) in the latest Oregon Climate Change Research Institute assessment report.

Climate trends and projections suggest the fire risk will only become worse statewide.

Cause for Climate Change

Trump, many in his Administration, and many in Congress, reject the conclusions of atmospheric scientists that gases released by the combustion of fossil fuels (among other human activities) are causing global warming and the climate chaos we are experiencing. These individuals inevitably don't value the capacity of our forests, particularly old-growth forests, to capture and store carbon from the atmosphere and reduce the concentration of atmospheric carbon dioxide. This would counter the global warming that atmospheric carbon dioxide (among other gases) causes.

Despite the skepticism of these political leaders, there actually exists next to no doubt among the professional climate scientists who study this issue that the driving force behind the global warming and climate change we are experiencing is greenhouse gas emissions. For example, a

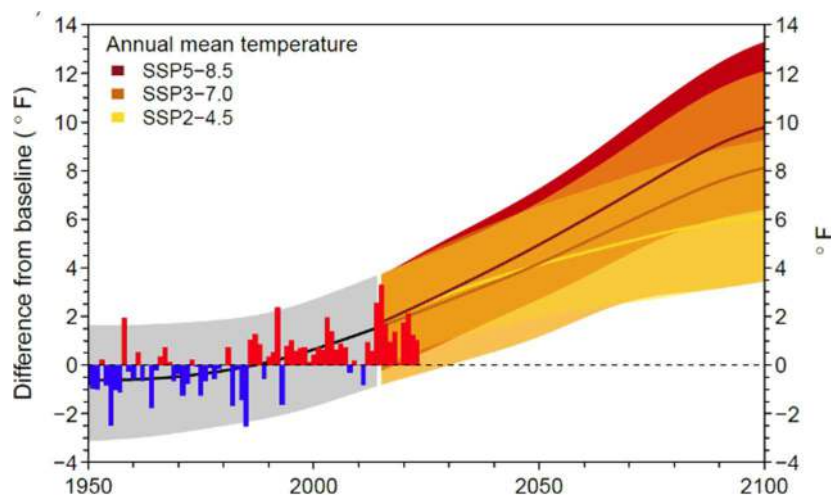


Figure 6. Temperature projection in Oregon to 2100 per the Oregon Climate Change Research Institute (Fleishman 2025).

recent study (Lynas et al. 2021) placed the consensus among publishing climate scientists at 99% while another report on peer-reviewed publications concluded there exists unanimity, (i.e., 100% of research scientists concur (Powell 2019)). The consensus is that the increasing concentration of greenhouse gases in our atmosphere, driven largely by our combustion of fossil fuels

(UN undated; NASA 2024) are causing the planet to retain heat that previously would have passed out into space. Journet (2025) identifies the 12-step climate science consensus. No amount of denial among those adhering to the Trump delusional party line can undermine the evidence-based reality that is the climate science consensus.

It is important to understand that the O&C Act and the 1994 Northwest Forest Plan are totally absent from the list of potential causal agents of the trend in area burned. Implying otherwise represents an abject failure on the part of those proposing an increase in logging as a remedy for wildfires to understand the drivers of the trends they cite as justification. It is also important to appreciate that, if maintaining healthy western forests is our goal, wildfire is an essential

component (e.g., Kouarti 2021; Anthony 2025; WRA 2026). This means that rather than suppressing and extinguishing every fire or potential fire, we must learn to manage fire.

Forest Implications of Timber Harvest

The first point to note in this regard is that timber harvest contributes to greenhouse gas emissions through the burning of slash piles, the use of oil products to drive mechanical equipment, and the processing and transportation of timber.

Summarizing emissions patterns Talberth (2017) pointed out that “Timber harvesting is by far the largest source of greenhouse gas (GHG) emissions in Oregon.” The same author added “Nationwide, logging emits more carbon than the residential and commercial sectors combined.” Seminal research conducted by Law et al. (2018) assessed the contribution of timber harvest to greenhouse gas emissions in Oregon. Based on this analysis, Segerstrom (2018) reported that “The wood products sector generated about one and a half times more emissions than the transportation or energy sector emissions reported by the Oregon Global Warming Commission.” VandenEnde (2023), meanwhile, reported that 10% of global carbon dioxide emissions result from timber harvest.

Computer modeling of anticipated future climate trends reveals that many commercially valuable tree species in Oregon will be threatened (Crookston and Radtke undated). The projections are based on data compiled where the tree species have survived in the recent past, and comparing future conditions to that recent climate. Note, these maps identify where future conditions are appropriate, not where the trees will occur. The latter will be determined by the capacity of the trees to exhibit geographic range adjustment. Being compiled from historical distribution data, the climatic conditions represent the realized niche of the species rather than the fundamental niche representing where they could occur absent species interactions (BD 2019).

Historic and projected distributions of climatic conditions appropriate for several economically important species in Oregon are presented in Figures 7 to 12). In these maps, high viability conditions are depicted in red/burgundy, while intermediate conditions are in yellow / green,

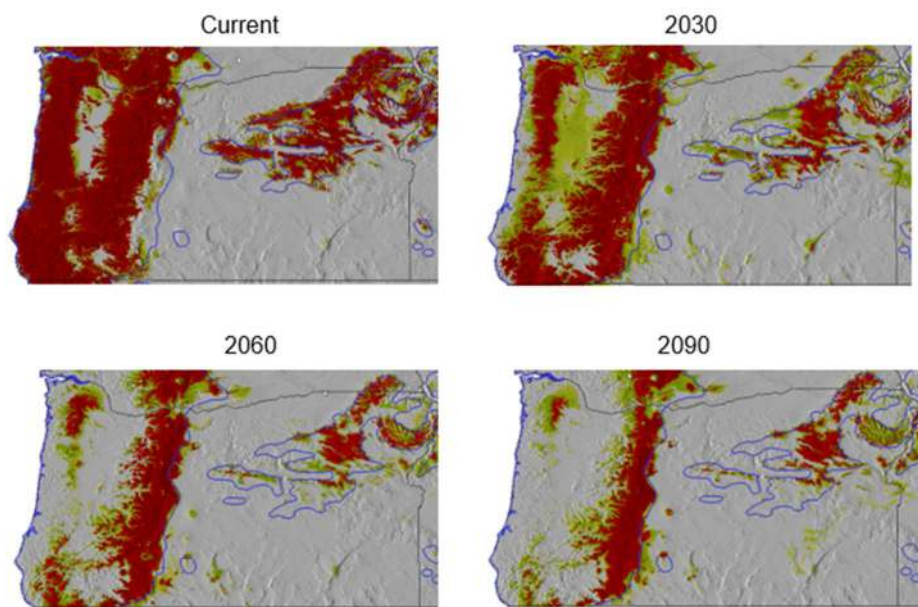


Figure 7. Current and future climatic condition in Oregon appropriate for Douglas fir (*Pseudotsuga menzeisii*) from Crookston and Radtke (undated)

and inappropriate climatic conditions are grey. Climatic Projections are based on the Canadian Centre for Climate Modelling and Analysis Coupled Global Climate Model (CGCM3) models (GOC 2023) and the A2 future scenario (IPCC 2000).

Figure 7 depicts climatic

distribution appropriate for Douglas fir (*Pseudotsuga menzeisii*) from current / recent past conditions through 2090. Notice that by 2090 conditions appropriate for this species are substantially reduced. According to Lang (2024a) this is the most important tree species ecologically and economically in Oregon, explaining why it was designated the state tree in 1939. Indeed, Lang notes: “Eight of ten conifers west of the Cascades are Douglas-firs.” OFF (2024) notes of Douglas fir “It is the highest-yielding timber species in North America and is a direct contributor to making the forests of the Pacific Northwest the most productive in the nation.”

‘Regrettably, as Gilles (2023) pointed out: “Douglas firs have been experiencing a dieback in recent years due in part to drought.” In terms of Southwest Oregon, which this Notice of Intent specifically targets, Bennett & Adlam (2023) pointed out that the Douglas fir decline has probably been building up for many years. As they describe the process, the trees become stressed by water shortage and drought impairing their physiological functioning. They then become susceptible to the flat-headed borer and other insect pests and pathogens resulting in decline and death. This discussion is elaborated by Bennett et al. (2023). The cause for the increased susceptibility may well be the response of conifers to drought stress. This involves an elevation of the free amino acid concentration in the tissues, as reported by Cyr et al. (1990). The mechanism driving the outbreak of these herbivorous bark-boring insects may well be exactly this increase of free amino acids in the plant tissue resulting from drought stress. As White (2015) argued regarding bark-borers, “The beetles' larvae normally face a severe nutritional challenge feeding on the slow outflow of dilute nutrients in the phloem of damaged

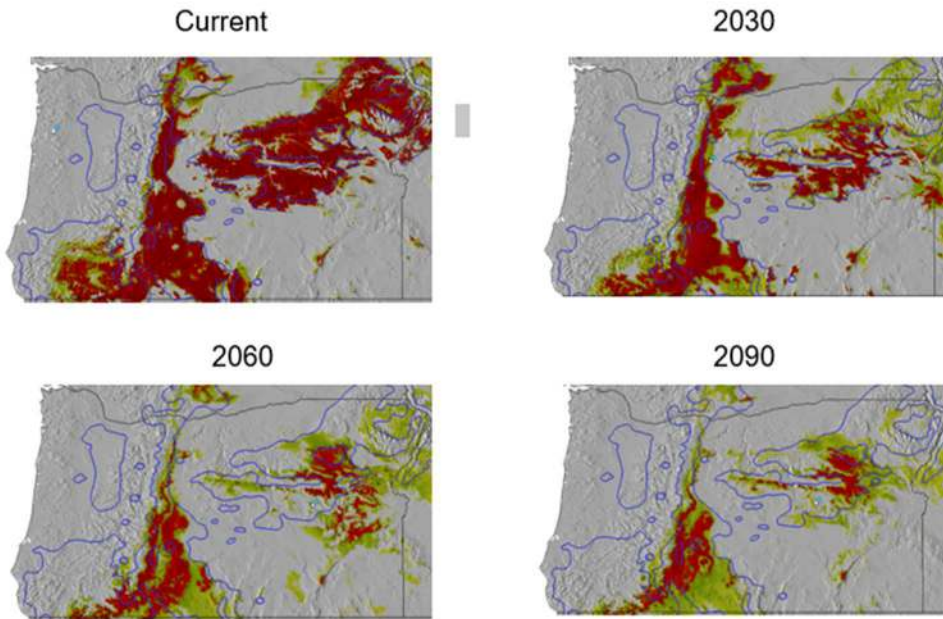


Figure 8. Current and future climatic condition in Oregon appropriate for Ponderosa pine (*Pinus ponderosa*) from Crookston and Radtke (undated)

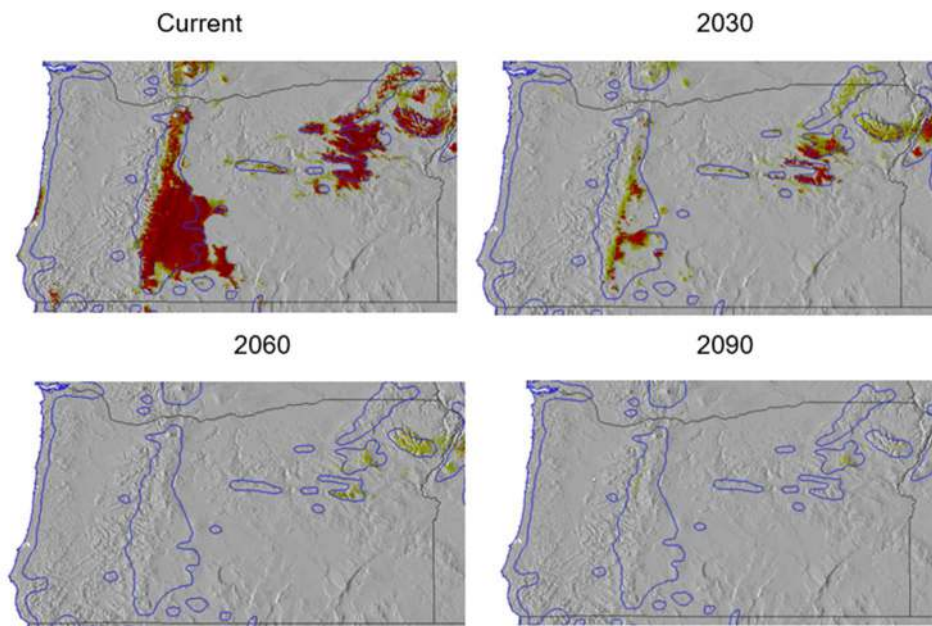


Figure 9. Current and future climatic condition in Oregon appropriate for Lodgepole pine (*Pinus contorta*) from Crookston and Radtke (undated)

or senescing trees.” Stress induced by climate change exacerbates the physiological response and renders the stressed trees more nutritious. Not only does warming speed up the rate of development of beetle larvae, it makes the trees more nutritious, accelerating larval development and [population increase even more.

Ponderosa pine (*Pinus ponderosa*), another commercially important tree

species in the Northwest, is depicted in Figure 8. Lang (2024b) stated: “Some claim that its wood is the most versatile in North America, and it is used extensively for residential and light construction. Unfortunately, much of the old-growth Ponderosa pine, with its high-quality sapwood, was harvested by the mid-twentieth century.” Lang (2024b) also noted: “Ponderosa

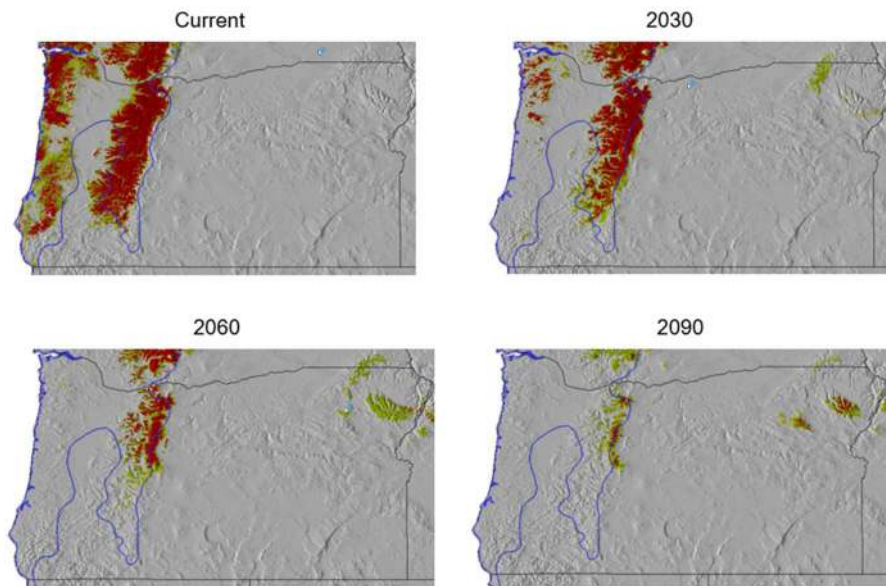


Figure 10. Current and future climatic condition in Oregon appropriate for Western hemlock (*Tsuga heterophylla*) from Crookston and Radtke

pine thrives in relatively dry climates and droughty or rocky soils because of its ability to acquire and conserve water.” This ecologically and commercially important species might survive better under climate change than Douglas fir. However, as the climate envelopes for this species along with the climatically appropriate conditions through the century suggest, this species will also likely

be substantially compromised by the changing climate.

According to OFRI (2025a) Lodgepole pine is also an important commercial species. Figure 9 depicts the historic and future distribution of climatic conditions appropriate for this species and demonstrates that the Oregon climate is likely to be outside the range for this species by 2090, meaning it will likely be extirpated from the state in the future.

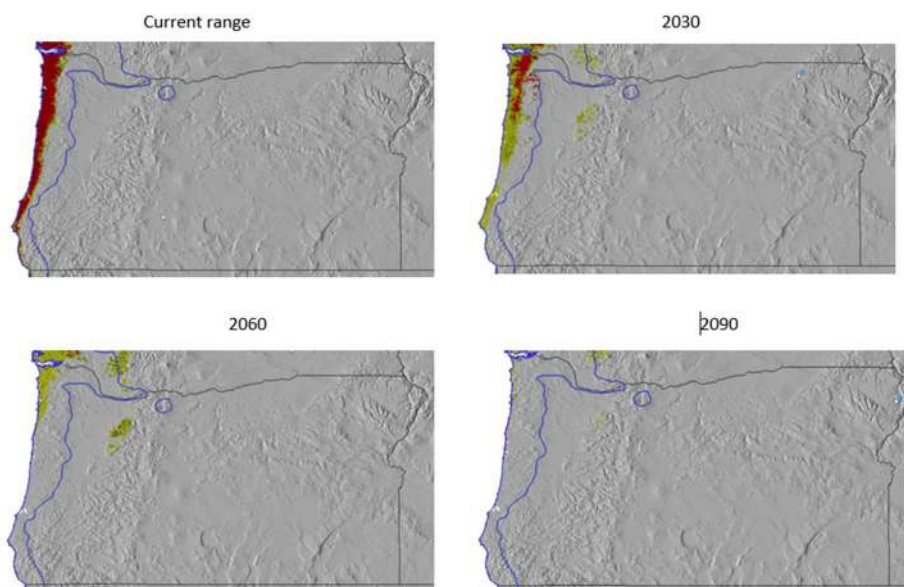


Figure 11. Current and future climatic condition in Oregon appropriate for Sitka spruce (*Picea sitchensis*) from Crookston and Radtke (undated)

Two other species that will be severely depleted are coastal Western hemlock (Figure 10) and the coastal giant Sitka spruce (Figure 11). Though potentially of less commercial importance as timber species, these are invaluable in the tourism arena for the beauty they impose on coastal regions.

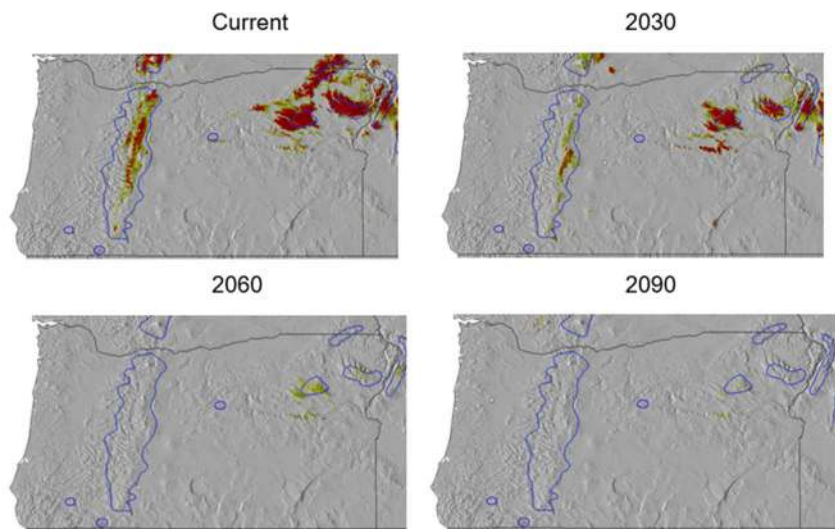


Figure 12. Current and future climatic condition in Oregon appropriate for Engelmann spruce (*Picea engelmannii*) from Crookston and Radtke (undated)

Finally, like its associated conifer, Subalpine fir (*Abies lasiocarpa*), the high elevation species Engelmann spruce (*Picea engelmannii*) will likely be extirpated by the end of the century (Figure 12). Though difficult to harvest because of the terrain, OFRI (2025b) describes this as a commercial species.

By promoting the release of greenhouse gases, paradoxically, the very logging that this Notice

seeks to increase, would exacerbate the threat to the tree species that the timber industry values that is imposed on them by climate change.

Logging and Watershed Function

UC-ANR (2026) pointed out that “After timber harvest or fuel reduction thinning operations, sediment delivery to nearby streams and waterways can increase, potentially affecting water quality, drinking water supplies, habitat, and recreational opportunities.” This is entirely consistent with earlier conclusions offered by Harr and Fredrikson (1988) that “Changes in water quality observed after logging in headwater basins in western Oregon have resulted from increased erosion of steep unstable land and sedimentation, nutrient-enriched runoff, and increased solar heating of stream water. Among other consequences, Shah et al. (2022) reported “Sediment delivery is the most significant water quality impact of forest management.” In reporting on the consequences of logging in the watershed of the north Oregon coastal town of Rockaway Beach, Atiyeh (2023) reported that 20 years of severe logging reduced stream flow during hot, dry summers along with increase in turbidity from erosion during wet fall and winter months. The result included closing of a water treatment plant. In obvious contravention of the requirements of the 1937 O&C Act, this is the likely outcome of this proposal for many communities on the Oregon coast.

To this observer, it appears evident that the authors of this proposal are less concerned about the quality of life for residents of western and southwestern Oregon than generating profits for timber industries.

Summaries of Consequences

Robertson (2026) pointed out that “The proposal includes reducing logging buffers for endangered fish, potentially eliminating old-growth reserves, and expanded clearcutting and similar aggressive logging practices, which the agency has previously acknowledged increase fire risk.”

Meanwhile, CW (undated) suggest: “The admin’s goal for revising the plans is clear: maximize timber production at the expense of all other forest values. In other words, as the twin climate and biodiversity crises rage on, the Trump admin wants to catapult back to the days of clearcutting public forests and sacrificing species’ survival, habitat protections, and drinking water sources to achieve unsustainable logging levels.”

I close by pointing out that Oregon and other western states are not Third World nations possessing a richness of natural resources that should be plundered for the benefit of faraway Timber Investment Management Organizations and Real Estate Investment Trusts. These forests belong to the people of these states and the people of the nation.

Overall Conclusion

Of course, the O&C Act long predated our awareness of global warming and its climate change consequences, or our understanding that climate is a profound contributor to wildfire risk. It is unsurprising, therefore, that the act contained no mention of these potential values. Maybe, in 2026, we should be a little better informed than Congress was in 1937 and respond accordingly.

In a “speech delivered on the steps of the Alabama State Capitol in Montgomery at the end of the march from Selma to the State capital...” (Wilson undated), Martin Luther King Jr opined that ‘the arc of the moral universe is long, but it bends toward justice.’ We must also hope that ‘the arc of the sentient universe is long, but it bends toward accepting evidence-based reality (science) rather than delusional conspiracy hoaxes.’ The Trump era, as represented in this Notice of Intent operates as a diversion from the latter arc. We must hope that the current diversion from both these arcs soon runs its course and is replaced by a culture more sympathetic to both scientific-demonstrated reality and social justice.

For the extensive litany of reasons identified above, Southern Oregon Climate Action Now and the Consolidated Oregon Indivisible Network strongly oppose the effort embodied in this Notice of Intent to liquidate our western forests and transform them into board feet of timber. Western forests are more valuable to us, to the nation, and to humanity as a whole as healthy forests.

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