

Bureau of Land Management,
Western OR Plan Revisions Office
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Portland, OR 97208

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To Whom It May Concern:

I am writing in response to the Western Oregon Plan Revisions (WOPR) draft EIS. Please include my comments in the public record. I am a professional biologist, and have worked and recreated in the public forests of western Oregon for most of my adult life. I am upset about many aspects of the preferred alternative. A partial list follows:

Clearcut Logging - The plan calls for an enormous new emphasis upon clearcutting, which is not necessary for regeneration of stands, nor is it desirable from an ecological perspective. Clearcutting subjects soils and vegetation to a drastic increase in solar radiation and air movement, which converts the site to a very harsh one, which makes reforestation difficult. Add to this the sudden increased vigor of shrub and hardwood tree species, due to all this increased insolation, leading to stiff competition for water and soil nutrients, and you have created a very challenging situation for conifer re-establishment. Clearcutting converts a stand into habitat which is not appropriate for many plant, bird, mammal, and fungal species. Clearcutting also greatly increases the risk of wildfire, by replacing fire resistant mature trees with a high density of very small diameter ones very prone to burning, and adding to the dead woody fuels load on the ground. If a new road is built to access the unit, this allows motor vehicles, which are major sources of fire ignition, into the new conflagration zone.

Old Growth Logging - The plan calls for an enormous new emphasis upon old growth logging. Old growth, or late successional, stands are ecologically and socially important for many reasons. Some of these reasons include their value 1) as plant, fungal, and wildlife habitat, 2) as sources of clean water for both anadromous fish species and human communities, 3) as carbon sinks to ameliorate the effects of global warming, 4) in lending resilience to fire, and 5) as places for high quality human recreation experiences.

Riparian Buffers - The plan greatly reduces the size and effectiveness of riparian buffers. This will be yet another blow to struggling salmon and steelhead populations, as more timber harvest closer to streams will result in more solar radiation penetrating the canopy and heating the water, not to mention the increased likelihood of significant soil erosion adding sediments to streams.

Old Growth Reserves - The plan greatly reduces the acreage of old growth reserves. These reserves were created as part of the Northwest Forest Plan (NFP), which, for all its imperfections, was at least a science based, logical effort to protect our biota in a sustainable, ecological way. As I understand it, Judge Dwyer stated in his approval of the NFP, that it was the bare minimum necessary to protect the Northern Spotted Owl, which

was the whole reason for the NFP. Granted, Judge Dwyer is not a biologist, but he made his decision only after reviewing the science relating to the owl's population status. Granted, that was 13 years ago, but from what I have read lately, the Spotted Owl's existence is even more precarious now than it was then, when Dwyer made his statement. These late successional acres proposed by WOPR for logging are an essential part of the plan to maintain and improve the ecological health of federal forests in the range of the Spotted Owl, which benefits countless species in addition to the owl.

Climate Change - The plan ignores the entire issue of global climate change, and the role of Oregon forests as repositories of carbon, probably the most significant contributor to global warming. It is true that we are unsure of the details of how global climate change will impact particular places. However, we do know that climate change is reality, and that we are locked in to warmer average temperatures for a long period. We do know that these forests, especially the older ones, act as important carbon sinks. We know that cutting them into slash (which probably will get burned eventually, perhaps intentionally) and small diameter pieces, such as lumber, increases the likelihood of their stored carbon being liberated. We know that young stands are not capable of sequestering as much carbon as older ones, so the value of a stand as a carbon sink drops drastically when it is "regenerated."

We know that some affected areas, such as southern Oregon, where I live, are marginal enough even now, in terms of their ability to support a forest ecosystem, due to high summer temperatures, low summer precipitation, and consequent high frequency of fire. When a stand replacement fire occurs, the new stand goes through a long – several decades – period of great vulnerability to another fire. If a fire occurs during this period, it will likely eliminate the new, young stand, and the process will begin again. During this vulnerable period, the stand may be dominated by shrub and hardwood tree species.

If the local/regional climate shifts to a warmer, drier one, or even just a warmer one, which brings winter precipitation more in the form of rain instead of snow, growth rates of new conifers may decline, thus prolonging the period of vulnerability. Fuel moisture may decrease, leading to more frequent fires. In such a scenario, much of the southern Oregon forests may fall into a vicious cycle of fire-vulnerability period-fire-vulnerability, ad infinitum. Effectively, the forest will have been eliminated, and replaced by a shrub-dominated community.

Considering the plausibility of this scenario, and its drastic implications for our local/regional economy (both extractive and tourist) and quality of life, the following suggestions seem valid. 1) Perform a thorough analysis of the interaction of various climate change scenarios and various vegetation management scenarios. 2) Err on the side of caution (the cautionary principle), in deciding on a management plan. The preferred alternative, or any of the action alternatives, is not cautious, to put it mildly. If such a plan is adopted, we may permanently lose our forests by the time all the data are in regarding the new climate patterns.

Off Road Vehicles – The plan designates 100,000 acres of "habitat" for noisy, polluting, expensive, dangerous, and damaging ORVs, often in people's back yards. It is certainly true that the current system - of essentially allowing ORVs anywhere on public lands – is not working. It is causing much resource damage, and this is nowhere more evident than

on some of the BLM lands in the Illinois Valley, where ORVs carve deep ruts and threaten sensitive plant communities. But in my opinion, ORVs should be discouraged everywhere (through high taxes on the purchase of the vehicles and their fuel and prohibitions on their use on ALL public lands), rather than encouraged in certain places. We are already causing enough damage to our natural resources and our climate, through our dirty love affair with fossil fuels. I see driving around for fun in the least fuel-efficient vehicles imaginable as a practice which is globally indefensible, and which must end.

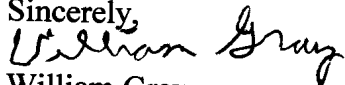
New Roads – The plan calls for the building of 1000 miles or more of new roads, at a time when the BLM and the Forest Service cannot keep up with maintenance of the roads they already have. Forest roads fragment habitat, and compromise the stability of some soils and hillsides, resulting in slope failures. They also allow members of the public to enter, and often start fires, dump trash, poach wildlife, etc., in areas they would otherwise not enter. We do not need more roads; we need fewer.

From my reading of the O&C Act, and from conversations with others more versed in law than I, it seems dubious at best that this Act really requires these O&C lands to be managed for timber production as the use that trumps all others. So I think it is a very safe assumption that this process will end up in court, which will cost us taxpayers a lot of hard-earned money. Why not give us a break, and save us the cost of the litigation, by not proposing a plan of such doubtful legality in the first place?

The EIS conveys the impression that the BLM is mandated to adopt such a plan as this by the terms of the sweetheart settlement to the suit brought by the timber industry. This is clearly NOT true. The settlement only required that the WOPR *include* at least one *alternative* effectively removing NFP protections from the O&C lands. The BLM is in no way constrained to *adopt* any such alternative. It has already fulfilled its commitment under the settlement, by producing this document. The BLM can, and should, now proceed to adopt a management plan which lives up to its commitment to manage its public lands for the benefit of the American people and the ecosystems existing on that land.

For all of the above reasons, I support the adoption of the “no action” alternative, i.e., the continuation of the Northwest Forest Plan. Thank you for considering my views.

Sincerely,



William Gray

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Cc: Sen. Ron Wyden
Sen. Gordon Smith
Rep. Peter DeFazio
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