



# Timber Products Company

THE TREMENDOUS RESOURCE

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RECEIVED  
DEC 20 2007

December 14, 2008

Edward Shepard  
OR/WA State Director  
Bureau of Land Management  
P.O. Box 2965  
Portland, OR 97208

Re: Western Oregon Plan Revision (WOPR)

Dear Director Shepard:

Since the economic vitality of our rural communities and the overall health of the BLM managed forests are of critical importance to me, I would like to make the following comments concerning the Western Oregon Plan Revision (WOPR).

At a minimum management level, I would like to support Alternative 2. However, none of the three active management alternatives, or the no action alternative presented in the DEIS meet the requirements of the O&C Act because they do not manage the land for the dominant use of timber production. Reserving the majority (52%) of the suitable timberlands for the purpose of the Northern Spotted Owl (NSO) and other fish, flora, and fauna is contrary to the O&C Act.

Because of the unique nature of the O&C Lands, by law these lands are not available to be part of a reserve system designed to recover a listed species. The BLM should consider active management for the protection of listed and sensitive species and their habitat before adopting passive, reserve strategies. The alternative selected by the BLM, however, should be one that will not jeopardize the continued existence of listed species within the species entire habitat range. The risk of no action (or minimal action as in the cases of Alternatives 1 and 3) in these set aside areas is one of catastrophic wildfire, insect, or disease outbreaks due to overcrowded forest conditions. These events will alter the habitat types that wish to be encouraged far more than active management in these areas.

For public health and safety reasons, BLM must manage these lands to reduce the threat of catastrophic wildfire. In doing so, the BLM will also reduce the threat of the loss of wildlife habitat for the various wildlife species it is trying to protect and enhance. Just because an area is defined on a map as a Late Successional Reserve (LSR), does not keep wildfires out or make the wildlife in them immune from danger. Over the last decade there have been numerous examples of LSR set aside areas destroyed by wildfires (The

Timber Rock fire in Southern Oregon is one example). Setting aside land is obviously not a protection measure for that land, or the wildlife habitat condition that currently exists.

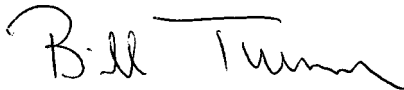
In all the alternatives, a minimum of 52% of the land is being set aside to protect species that apparently need more shade than ever occurred in historical conditions either on land, or in the streams. When looking at the current landscape of the more than 2.6 million acres of BLM land, there is more than 73 billion board feet of standing timber. This is a 70% increase in the amount of timber that existed on these lands in 1943 when there was 43 billion board feet. There cannot be a 70% increase in standing timber without an increase in tree canopy closure and effective shading of streams. These forests are at a higher risk of overcrowding and being susceptible to insect, disease, and fires if they are not actively managed (thereby threatening the very species that is proposed to be helped) than if they were more actively managed and made into a healthier more natural open condition that existed more than 60 years ago.

The trees in our forests can be grown and used to store carbon (CO<sub>2</sub>) helping with the reduction of greenhouse gases. However, if these trees are allowed to burn in a wildfire, all of that carbon is released back into the atmosphere in the form of smoke during the fire, and afterwards as the wood rots and decays. Conversely, if the trees that have stored the CO<sub>2</sub> are harvested and used to make lumber, and plywood and made into durable products (houses, furniture, etc.), the CO<sub>2</sub> is stored indefinitely. Due to the renewable nature of trees, the forest is then re-grown and the process of storing and sequestering carbon can continue in perpetuity.

As directed by the O&C Act itself, the BLM must develop and analyze at least one alternative that maximizes the amount of land in timber production and receipts to local county governments. This has not been done with any of the current alternatives. Even under alternative 2, only 66% of the annual growth rate would be harvested.

Thank you for considering these comments as you decide on the alternatives presented before you.

Sincerely,

A handwritten signature in black ink that reads "Bill Turner". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

**Bill Turner**  
Timber Procurement Manager