

2 January 2008

Western Oregon Plan Revisions  
P.O. BOX 2965  
Portland, OR 97208

1551  
RECEIVED  
JAN 04 2008

To Whom It May Concern:

My name is Ron Gaines. I am a wildlife biologist who has been working in the Pacific Northwest for the past 16 years. I am writing you now to express concerns I have regarding the Western Oregon Plan Revision (WOPR).

My concern is that the WOPR EIS does not adequately address the impacts that implementation of the plan, in any form, will have on threatened wildlife, water quality and the socioeconomics of timber industry.

The WOPR in any form, but especially with the preferred alternative #2, reduces the amount of habitat available to the northern spotted owl and the marbled murrelet through out their ranges in Oregon. Under current habitat conditions the populations of both of these species continue to decline. If the amount of available habitat is reduced below current levels via the WOPR any further reduction in habitat quantity or quality through natural (a stand replacement fire for example) or man-made (increased logging on private lands) causes would have catastrophic consequences on wildlife populations already struggling to recover. The WOPR does not address how these species are going to make strides towards recovery with less habitat than is currently available.

It is implicit in the WOPR that the BLM will have little or no responsibility for contributing towards the recovery of the northern spotted owl or the marbled murrelet. Private landowners, however, will still have to comply with existing regulations when it comes to "take". The WOPR will place a disproportionate amount of the responsibility for recovery on private landowners. This is not only unfair it is unworkable. Private landowners don't generally come to the recovery table willingly and if they perceive that the BLM is not responsible for contributing towards the recovery of threatened and endangered species than neither should they be responsible. The WOPR will not only result in the decline of suitable habitats on BLM lands but on private lands as well.

I am concerned about the size of stream buffers. Under the WOPR the size of stream buffers will be reduced. The WOPR does not adequately address how these changes are going to impact such things as water quality, water temperatures or increased silt loads. All of these factors influence a stream's ability to support fish stocks. The wide geographic reach of the WOPR has great potential to negatively impact sensitive species of anadromous fish, especially in the Coast Range of Oregon.

Finally, I don't believe the EIS adequately addresses the socioeconomic ramifications of the WOPR. The WOPR will have a negative impact on private timber producers. It is implied that this impact will be minimal and short lived. The WOPR does not adequately address the degree of this impact on the private sector, especially smaller timber growers.

Also, most mills in Oregon no longer have the capability to handle old growth logs. Most converted their operations to handle small logs in the mid-1990s. If the BLM once again puts old growth trees on the market only a very few mills will be able to handle them and only those few mills will enjoy the economic benefit. If other mills decide to get involved in the old growth market the supply of large logs may not last long enough for these mills to recoup the cost of retooling. The EIS does not address this issue.

The WOPR in any form will impact a huge geographic region. I believe it moves too far too fast. I don't believe the EIS adequately addresses the issues of habitat loss for sensitive species of wildlife, water quality and the social and economic impacts of the plan especially on small woodland operators. Until these issues are properly addressed there is too much uncertainty as to how the WOPR will affect the ecological well being of western Oregon.

I hope you will take a closer look at the WOPR with these concerns in mind.

Thank you for your time.

Respectfully,

A handwritten signature in cursive script that reads "Ronald C. Gaines".

Ronald C. Gaines  
200 W. 29<sup>th</sup> Street  
Vancouver, WA 98660  
360.639.0019  
rcgaines@spiritone.com