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January 9, 2008

Bureau of Land Management
Western Oregon Plan Revisions
333 SW First Avenue/ P.O. Box 2965
Portland, OR 97208

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Dear BLM Staff,

While attempting to comply with your agency's wish for 'substantive' commentary on the WOPR Draft Environmental Impact Statement, I must first address a couple of issues that underlie the very framework upon which your agency hangs this document.

The first issue is the very debatable decision by the BLM that there is adequate reason to constitute 'Purpose and Need' to replace the Northwest Forest Plan. Projected harvest levels have not been achieved in large part due to the agency's structuring of timber sales to include areas that contain listed species, that degrade aesthetic and recreational values adjacent to local communities, and that threaten undue erosion and increased fire danger through the removal of older fire-resistant trees. This has led to vigorous opposition to the harvest plans, which if structured differently, and presented with a genuine campaign to involve local stakeholders, could have resulted in much less grassroots opposition in these communities, and quite possibly greater actual harvest levels. Certainly there would have been much less litigation associated with reasonable levels of thinning cuts in low elevation 'plantation' timberlands. Another key factor in the failure of your projections is the usage of very unrealistic baseline harvest amounts. Hopefully our society has moved beyond the 1980's mindset that allowed the unsupportable and by no means 'sustainable' harvest levels that occurred then. The social and economic effects of these record harvests were a key element spurring the creation of the very Northwest Forest Plan which you now propose to supersede; and which the BLM has used as baseline volumes for their harvest projections, and uses in the WOPR. Across the board the science of 'Sustainable Harvest Practices', biological and botanical effects of various harvesting methods, watershed hydrology and geology, and fire-danger on timberlands, has been distorted and politicized by parties within and without your agency with an eye to creating a 'scientific' and administrative rationale for 'Purpose and Need' and thence 'the WOPR'. These factors could have been addressed within the framework of the Northwest Forest Plan.

The second issue is the BLM's interpretation of the core direction of the O&C act of 1937. With the stroke of an agency pen you have moved the principle of 'sustained yield' forestry from its position in the O&C act as a tool, "...for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the stability of local communities and industries, and providing recreational facilities.", to unassailable primacy over the very things it was intended to secure and protect. Sustainable harvest now has top operational priority in the WOPR (even though there is ample evidence to suggest that none of the action alternatives are sustainable in broad terms). All other laws, regulations, guidelines, policies, concerns, etc. become enforceable or actionable only if and when they, "...would not conflict with sustained yield forest management in areas dedicated to timber production." This arbitrary and radical re-interpretation of the O&C Act places the O&C timberlands, the life therein, the watersheds they comprise, the educational, historical, and recreational values they possess, and the very economic livelihood of local communities into the sphere of influence-and seemingly even control- of the timber extraction and processing industries. These industries are profit driven and, like virtually all of our private sector business interests, are foremost beholden to the 'bottom line'. This leads to prioritizing short-term revenue spikes over truly sustainable long-term revenue and benefit streams that best serve and enhance the local communities and the citizens who live in and among the O&C lands.

The following section briefly addresses just a few of the numerous specific flaws in the Draft Environmental Impact Statement. I have taken the liberty of substituting English for jargon in portions of these observations.

The enormous expansion of OHV emphasis areas in and around my home in the Medford District seeks to fulfill elements of the O&C Act's direction to provide for recreational facilities. It is unfortunate that the agency chose the most invasive, noisy, erosion-causing, and hard to regulate form of 'recreation' to so aggressively promote. OHV recreation is innately deleterious to the very environment in which you propose to encourage it, and is also one of the hardest forms to interface with other user groups. These proposed OHV areas will harm the property values and quality of life of the citizens unlucky enough to reside in visual or auditory range of these areas. Given the BLM's unimpressive track record of regulation and monitoring of existing OHV sites, it is unlikely you will in any way be able to effectively manage any increased OHV emphasis recreation. All of the above listed effects are counter to the stated intentions of your agency. If the WOPR is to truly reflect the direction given in the O&C Act, increases in recreational facilities would be spread equitably across the spectrum of recreational activities. Recreation promotion within these lands should also be contingent upon the activities being in harmony with other activities and with the environment of the lands themselves. While your 'Preferred Option' and its expansion of these OHV areas will please the lobby which so actively promoted it, it will cause great backlash from affected citizens and thus undermine the validity of this component of your management plan.

The degradation of the visual aesthetic view-shed by elements of your 'sustainable harvest' regime under your preferred alternative is very troubling for residents of local communities. The proposed clear-cuts and resultant visual impacts will have a demonstrable negative effect on property values, property marketability, quality of life, and local economic stability and viability due to decreased tourism opportunities. These unnecessary ill-effects will persist for many years after the harvests have occurred. Existing recreational facilities, some of which are listed in your tables as having 'scenic' values, will be degraded or devastated by these actions. This is contrary to two of the core principles of the O&C Act, "...contributing to the stability of local communities and industries, and providing recreational facilities".

The removal of the 'Natural Selection Alternative' from serious consideration as a listed alternative for questionable administrative reasons, despite its acceptability and inclusion in the South Deer Landscape Management Plan, is a failure of the agency to pursue possible strategies that are not forest industry driven. While this alternative may not meet your rigidly structured plans for a region wide plan, it should have been included as a sub-alternative for implementation in areas of the Medford District.

Reductions in the Riparian buffer areas are ill advised to say the least. While some of your staff fish biologists have told me that they endorse the protection levels under the action alternatives, an equal number have stated their concerns that there are biologically significant elements that have been removed from the formulation of the plans. Parameters for modeling the effects of reduced riparian buffer zones are the subject of disagreement within your relevant science staff. The results of this contested modeling regime are core to your reductions in buffers. No provision is made under the 'Preferred alternative' for improvement of streamside habitat in timber management areas, and questionable allowance for the mere maintenance of current conditions. For instance, ongoing efforts of various groups to encourage the return of a watershed's historical salmon population levels would run up against the possibility of a harvest that cut said watershed to your riparian criteria for non-fish bearing streams and thus leave marginal conditions for any fish populations subsequently trying to spawn there.

Alternative Two promotes huge increases of clear-cuts, and even mandates them in areas that are currently identified as Late-Successional management. This will have a disastrous effect on virtually every aspect of a healthy, naturally fire-resistant forest ecosystem. The citizens of this region, the state, and the nation have clearly stated their desire for the protection of Old-Growth forests. Accepted industry wisdom on stability of clear-cuts in steep terrain has just been shown to be questionable at best in the aftermath of the recent landslides in Oregon and Washington. Connectivity of habitat islands will be constantly threatened and degraded to the obvious detriment of the resident species balances. Clear-cuts, in addition to their immediate negative impacts, also require huge expenditures in the

following years to reforest (converting the harvested areas to tree plantations of commercially desired species), control competing vegetation with herbicides which may pollute watersheds, and then periodically perform 'fuels-reduction' projects on the areas. These areas were far more fire-resistant before the harvest than they will ever be again under this alternative. It seems very likely that WOPR 'fuels-reduction' projects will follow a trajectory similar to current projects that get proposed and implemented not on the basis of true fire danger, but on the availability of marketable timber within the project areas; 'fuels-treatment' merely being the marketing spin attached to the harvest, making it palatable for a public conditioned to knee-jerk responses to the 'horrors' of fire. This will leave the project areas which have minimal or no marketable timber (recently clear-cut areas) a low economic priority for such projects; even though these areas will soon have among the highest fuels-loading within the landscape. The net effect of increased clear-cut harvesting will be an environmentally, economically, and scenically degraded landscape with higher susceptibility to catastrophic fire events.

The O&C lands are the peoples' lands, not select industries' subsidized tree gardens. The BLM would be much more deserving of the support of the citizens of Oregon if the agency's policies and operational plans better reflected the full spectrum of stakeholders on the lands it manages. Many of the communities in the Medford District are already suffering long term negative effects from linking basic public services to revenues generated by damaging extractive industries. These revenues have been, and will continue to be under your plan, subject to interruption by fire events, market fluctuations, national economic trends, and the grassroots actions and litigation of citizens who are members of the public you claim to serve. I strongly urge you to rethink your management plans to reflect the reality that narrowly-targeted, truly sustainable, limited, harvest options may actually result in more timber and associated products reaching local markets. Sustainability must include all those elements you have chosen to use your interpretation of the O&C Act to eclipse. Our communities deserve your best efforts to ensure the full range of core goals of the O&C Act are given attention and included in positive ways in all your management decisions.

I will sincerely thank you for actions on your part that constructively address the areas of concern the citizens of the Medford district, myself included, have written about.

Yours truly,



Kelly Green

Cc: Senator Ron Wyden, Senator Gordon Smith, Representative Greg Walden, Representative Peter DeFazio