

Myrtle Creek Rural Community Partnership



P.O. Box 40 Myrtle Creek, Oregon 97457

July 11, 2011

TO: Roseburg BLM OR100MB@blm.gov

ATTN: Paul Ausbeck & Steve Lydick, South River Field Office

Subject: Myrtle Creek Watershed Community Partnership scoping comments on the Roseburg District Secretarial Pilot

Dear BLM:

Please accept the following scoping comments from the Myrtle Creek Rural Community Partnership concerning the [Roseburg District Secretarial Demonstration Pilot Project](#) (DOI-BLM-OR-R050-2011-0006-EA). The Myrtle Creek Rural Community Partnership is made up of land owners and businesses affected by public land management activities in the headwaters of Myrtle Creek. Our goal is to ensure both our community and our environment are sustained and restored. The Pilot Project significantly impacts both. We know that both are essential to our well being.

The proposed action involves variable retention regeneration harvest (aka clear-cutting) of hundreds of acres of maturing forests to which there is very little (12%) in the watershed. The "variable retention" basically leaves small patches of trees with some scattered individual large leave trees while 70-80% of the trees are cut and removed from the forest. Retention contribution acres include already protected Riparian Reserves in the total such that non Riparian Reserve will receive higher clear cut type treatment. However, even Riparian Reserves are slated for logging under an assumption by the District that cutting trees in Riparian Reserve to reduce density improves/restores Riparian habitat conditions and function. Leave tree criteria includes favoring dry tolerant species such as pine (in what is a moist forest) based upon unsupported predictions that global climate change is going to unduly dry the moist forests in this location. Tree planting will occur even though the stated purpose is that "early successional" or "pre-forest" conditions get truncated by tree planting. The rationale for the latter is that planting at densities of 200^{+/-} trees per acre is not truncating the pre-forest conditions.

BLM consultants driving the process Norm Johnson & Jerry Franklin use an unpublished, un-peer reviewed paper they prepared August 15, 2009 with specious “restoration principles” not supported by practical data germane to the watershed, wildlife habitat they suggest would be restored, and the community we live in. We are struck by the lack of true measures or criteria to back up determinations that more clear cutting of federal timber in this watershed is needed to “restore” “early successional” wildlife habitat. Given the current condition of the headwaters of Myrtle Creek and the social economic needs of our community, the BLM should:

- 1) Re-focus efforts to restoring the connectivity of once widespread but now incidental and tattered mature and old forest landscape to regain our summer water flow and storage capacity, and improve stability and reduction in winter flows from more frequent bank full events that continuously irritate the stream channel all affecting long term water conservation and storage capacity that directly affects our land condition downstream. This is a good neighbor policy. There should be no actions upstream in the headwaters that pollute and transfer pollution to downstream users. This will be the case however based upon the planned harvest in relation to long term reduced flows, nutrient releases, and sediment.
- 2) Re-focus efforts to restoring the connectivity of once widespread but now incidental and tattered mature and old forest to provide habitat for threatened and endangered species. This would entail thinning and species diversity planting in tree plantations and road obliteration and decommissioning.
- 3) Connectivity: The headwaters of Myrtle Creek is along a major ridge system that is important for restoration of populations of Pacific Fisher and Pine Marten that once connected the Cascade populations to the Coast Range. The fact that there is a rare, large block of BLM land that could function as a key node in the recovery of Pacific Fisher populations and serve to connect these two major ranges is important. The habitat is suitable for the species particularly the proposed mature forest units and with reduced road densities the area would serve a major role in species recovery. The Pacific Fisher is warranted for listing under the endangered species act and should be a primary concern of the BLM.
- 4) Instead of clear cutting important and rare habitat, improve both early seral habitat and watershed processes and conditions by obliterating roads to restore underground water channels while at the same time creating secure and effective early seral habitat on obliterated road right away. This will provide more than enough desired early seral conditions in an effective manner well distributed across the watershed while meeting the Aquatic Conservation Strategy (ACS) and recovering listed spotted owl and fish. The logging prescriptions as described will retard attainment of the ACS due to impacts upon low flows, peak flows, and water pollution and is therefore inconsistent and illegal.
- 5) Focus on long term stable social economic needs and capacity of the community rather than corporate profit interests. This involves protecting and restoring, not further impacting or

retarding recovery of our headwaters and the water it stores and the natural amenities that make our area of interest to tourists and give greater value to every land owner's holdings.

- 6) Logging focused on what best benefits our community would be small scale, low technology and thinning providing job rich opportunities for small enterprise that help restore the forest rather than further degrade it with more "regeneration logging" which is just another form of clear cutting. The idea that there has to be large regeneration type cutting is only to serve large, highly mechanized (job poor) operations with costly equipment that does not work for focused habitat quality based treatments.
- 7) Use restoration thinning practices, plantings, and prescribed fire as a management tool. Help local enterprise by local stewardship contracts to do this work and to do road obliteration and post obliteration plantings that will support our community both in the short term and long by reconnecting the underground springs that give us cool summer water downstream.
- 8) Provide governmental support to help create value added wood products in our Myrtle Creek community such as assisting in the development and support of cooperatives with facilities equipment and sort yards is a real means to helping our community help themselves.

We do not support the proposed clear cut treatments of this Pilot. Specific detailed comments discussing the reasons follow. The proposed action is counterproductive from the standpoint of economic, social and environmental conditions to the majority of rural people in our community. While it may help a few mill owners and their white collar employees, the community as a whole only continues to be impacted. The argument that it has significant benefits to the County budget is also fallacious since currently big timber companies pay little taxes, and there will not be enough federal forest to cut for very long to receive O&C funds before the same problem will arise again. While that may help corporate timber get a short term pocket of money, it will only hurt our community further.

It is not hard to understand why this has all happened as it is a matter of being stuck in the concept that the *rural industrialization model* is still working when that has been proven not to be the case all across America. Rather, industrialization as we know it today has gone too far. It has so seriously depleted our natural resources that we have little to work with and are causing significant irreversible damage and pushing species extinctions.

Once providing jobs (for a short time in the context of history), industrialization has eliminated jobs with automation, a trend that has been occurring since the 1960's. While many of our friends and neighbors have worked in the timber industry (most in the past tense) and are stellar citizens, it is also true that jobs offered by the timber industry have always been unstable boom and bust, difficult family unfriendly work schedules resulting in the main contributing factor to one of the worst counties in regards to social problems (chemical dependency, domestic violence, high populations of student delinquency, drop out, pregnancies abuse, neglect). Douglas County social services historical statistics bear this out and demonstrate that these problems have not been connected to changes in federal volume but rather the community's dependency on the timber industry as a whole.

It is urged that the BLM rethink its role and approach in how it can support and work with communities through collaboration rather than a political top down approach to avoid the “crony capitalism” and false statements of forest restoration that has occurred in this Pilot process.

As recently stated by John C. Allen Ph.D., at the Rural Development Initiative’s annual conference in June at OSU, those commonly identified and approached as the “leaders” in a community will always focus on trying to keep the status quo because it is what works for them and all they know. The Pilot has been replete with the creation of new false paradigms (buzz eco terms) to hang on and that is what is destroying our community’s vitality and quality of life.

The Myrtle Creek Rural Community Partnership generally agrees as a group with the statements made in this scoping comments package. Some of us plan to also submit additional individual comments. Thank You for the opportunity to submit these comments.

Signed

X

Cindy L. Haws
Representative

chaws@frontier.com

Specific Comments

1. Water and the Aquatic Conservation Strategy

The Pilot as proposed will retard restoration of clean and abundant water flows affecting our community's a) valuable wild salmon population recovery and causing more species to be endangered, b) farming, c) tourism, and d) livestock operations, and e) new enterprise from people who want to be here for the beauty and clean environment. Over 50 years of data from Umpqua Watershed and other paired watersheds (Perry 2007) demonstrate that landscapes kept in a predominantly younger age class of trees (<70 year old) will cause too much water to be lost to unthrifty young tree evapotranspiration and evaporation significantly reducing critically needed summer flows over the long term. This applies to the Myrtle Creek watershed and headwaters. We downstream landowners in the Myrtle Creek Watershed who have lived and observed the stream flow for many years are experiencing this effect. Short term boosts in stream flows immediately after harvests are no consolation for significant long term reduction in summer flows and related temperature and nutrient pollution. These processes are well documented in the literature and are part of the 12 general principles of forest hydrology (ISBN: 0-309-12109-4 2008).

It is well known by our community that Myrtle Creek and its tributaries are fed by ground water that is dependent upon the storage capacity of what was a predominantly mature and older headwater forest with high surface area to volume, organic soil accumulation, and functioning wetlands systems (without road cuts) resulting in slow infiltration and drainage. Underground springs or "pipes" historically slowly fed cool water to the creeks we use during the summer and regulated winter flows so as to reduce the impact of erosion creating bank full flows. Rural residents have wells that tap this underground water and have observed flow changes associated with changes in conditions.

The Pilot project causes further impacts to these aquatic processes our community depends upon by creating and maintaining forest and road conditions that in combination with other conditions and activities on private corporate timber lands in the watershed cumulatively contribute to reduced water storage and infiltration, cut open and intercept the underground springs so that they no longer reach the creek or do so at the wrong time, and last increase water loss by evaporation and evapotranspiration of openings and new growth vegetation.

In response to suggestions by the BLM that they have considered these water impacts through application of Grant et. al. 2008 publication it is apparent that the information in the publication has been over generalized and misapplied. Particularly, our issue of low flows which are not addressed in this publication and the use by the BLM of a 2% road density that has no real meaning as a generalization without looking into the specific conditions on the ground. The idea that road impact to hydrology are a simple matter of percent area occupied ignores many of the true significant impacts. For example, the amount, extension and condition of mid-slope roads make a big difference in how much water is intercepted and drained faster reducing storage capacity even if it does not accumulate to 2% of the overall area of the watershed. The increased surface water created by road cuts and road stream crossings is more relevant. The soil type is also a factor which is another issue in the headwaters of

Myrtle Creek having high instability and likelihood of various kinds of erosion processes. These have not been adequately addressed in the Pilot. Rather, there has been an assumption that as long as less than 2% of the area in a landscape is a road and there are riparian reserves (even though there is proposed logging in them) all is ok. One should always apply an inventory of the specific ground condition characteristics of the local conditions in regard to any such publications. This has not been incorporated.

With logging and road infrastructure maintained in order to keep logging now and in the future the intercepted spring water is either 1) shunted over the roads to the top of the forest soil only to be absorbed by plants and transpired or evaporated *but not reconnected* to its underground "pipe" that goes to the creek or 2) channeled, leading to higher drainage rates to streams long before they would have reached the stream if underground causing loss of water storage and too quick drainage impacting the slow and continuous feeding of cool clean water to our streams.

In summary the Pilot project retards restoration of this critical ACS process and worsens these conditions in our Myrtle Creek headwaters causing significant impacts to our community as downstream residents who then suffer from loss of water quantity and quality with an increase in pollution from nutrients and temperature.

2. Our Community Social Economic Needs and Wildlife Heritage Are All Part of the Same Package

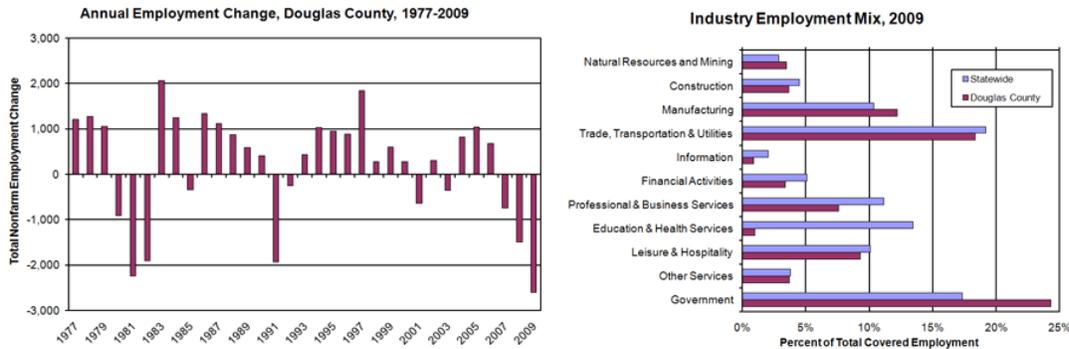
The Pilot project will destroy our community's and the general public's valuable wildlife heritage. All of the benefits and services of public forest affect our quality of life, income, financial independence and new enterprise drawn to our area for healthy, beautiful landscapes and waters. There is a far greater need for the services that intact and restored forests provide to us all (such as abundant clean water, wild land to connect to nature, storage of carbon to stabilize our climate and ecologically sustainable use of the forest resources) than a narrow short term profit interest of a few corporate timber companies.

At a recent Rural Development Initiatives Conference in Corvallis, Oregon June 24-25, 2011 a statement was made by key note speaker John C. Allen Ph.D. that impediment to restoring rural community vitality is the fact that "town leaders always want to maintain the status quo" in regards to industrial development and its impacts on rural communities. This has been the case in this Pilot process where the entire process has been one of control by government leaders with a corporate lobby interest to support profits for an overcapacity of timber companies to help them with more overcutting of cheap federal logs while continuing environmental destruction that burdens the rest of the public. This very issue of using corporate political cronies to define the social economic legs of the stool is exactly what has destroyed our community and the public trust and caused such huge environmental and job loss problems that are now our reality. This way of doing business is counterproductive to the general well being of the majority of rural people in our community from the standpoint of all three legs of the stool "economic, social and environmental" conditions.

There was a short point in time when timber harvest may have benefited our community. Corporate industrialization all across America's rural lands has proven to damage rural communities in the long run. Rural communities associated with farming and logging have all suffered a long term trend from the

loss of jobs and declining wages due to automation/mechanization and there is no escaping this with “breaking the log jam”(Wyden and DeFazio 2011).

“Employment in the solid-wood products industries fell from 134,000 to 108,000 between 1977–79 and 1987–89 (Greber 1993). These decreases took place even as harvest levels increased 5 percent over the same period. This increased productivity could be said to have displaced 24 percent of the jobs from solid wood products industries over the 10-year span (Figure 1). Even though fewer people had timber jobs, productivity increased as mills took advantage of modern technology. In 1977–79 it took about 9.2 wage and salary employees to process 1 million board feet of timber into solid-wood products (Greber 1992). By 1987–89 that figure had fallen to about 7 employees (Greber 1993).”¹



The trend described in the quote above has continued even when profits soared for timber companies in the 1990’s and the percentages of job loss to automation continued through the next decade according to our friends and neighbors who work or worked in the industry. One of our community members who has worked for a mill for over 30 years says that he has seen at least 50% of the jobs be replaced by automation where he works and wages declined when profits were high. The same happened to farm lands all across America. **The answer is not to increase more logging to feed automated mills and facilitate private log export while further damaging our environment and its capacity to support us (the common folk) in the long term.** The graphs above demonstrate the boom bust nature of the timber industry and the now very low proportion of jobs provided. Also note that during the boom of the 1980’s timber workers were forced to accept reduced wages (document available upon request). Wages have never recovered even when during the mid 1990’s when industry profits skyrocketed.

In terms of social economic health “*the timber industry has always been subject to the impulses of the market, change has been constant*”¹. Using federal natural resources to increase corporate production will do greater harm to our community rather than heal it with fake jobs.

The amount and type of harvest on both federal and private corporate lands particularly from the 1980’s to this time have had such a severe impact that our lands and waters are extremely outside any

¹ EM 8544 Reprinted January 1994 Timber in Oregon History and Projected Trends Flaxen D.L. Conway, Extension community outreach specialist and coordinator of the OSU Timber-Dependent Families and Communities Project; and Gail E. Wells, natural resources communications specialist, College of Forestry; Oregon State University

reasonable healthy balance. The specious Pilot proposal by foresters to log rare mature forest habitats to *supposedly* provide rare early successional “habitat” is such an example, as indicated Cindy Haws, wildlife biologist with many years of professional experience and a resident of Myrtle Creek. All that will result is more significant, cumulative impacts to many species including the northern spotted owl, pacific fisher, goshawk, wild coho & chinook salmon, sea run cutthroat trout, pacific lamprey, wild steelhead trout, populations of many species of cavity and downed tree birds, bats, mammals, plants and insects that require abundant populations to do the work of keeping forests healthy and providing abundant habitat for other species. There are easily observed cumulative effects of this imbalance. We rural community people have lost a multibillion dollar salmon industry, the jobs associated with it, and local fish as a healthy high protein food source among other reductions in our enterprise options due to an over emphasis upon the special interests of corporate timber industrialization.

Truthful concern for our jobs and quality of life would arrest this Pilot proposal and the propensity to continue to destroy the environment due to corporate interest in profit and expansion. This is what has resulted in communities with severe losses of natural resources and loss of diversity of opportunity to live other lifestyles. This Pilot project to date has been designed to placate corporate timber industry’s interest in maintaining its profit margin rather than restoring ecosystems and ensuring holistic healthy communities and landscapes with fully functioning ecological services that support all of its citizens. We have no doubt that corporate timber powers with their financial abilities to lobby congress will try budget riders making environmental laws moot and timber volume mandatory if they cannot get what they want through other means. This corrupt process of industry however is not a reason to make up strange reasons for logging and call it social economic support to the community. **This is an issue of environmental justice.**

In summary, process lacks any real social economic consideration of the affected community.

As members of the affected community, we find the ecological, social and economic benefits being claimed by the Pilot Project hollow but instead having a significant adverse impact upon us in all three areas. The Pilot process was disingenuous toward public involvement. Starting out suggesting it would be collaborative and restorative, it soon changed and became apparent it was instead, an already predetermined outcome to clear cut log to satisfy volume for corporate timber and was commandeered and orchestrated to that end. The general public was left with no meaningful means to affect the process or the plans. We do not see the proposed clear cut type logging as restorative as stated by the BLM and its consultants. Rather, we have observed contrived efforts like this over and over through the 1970 to 1990s with the result always adding huge cost burdens on the shoulders of the general public and our taxes while a few corporate interests benefit. (Note the large sums of annual State and Federal tax dollars going toward Watershed Councils for restoration). We are interested in getting our watershed back into a functional condition so that we all benefit.

3. Regeneration harvest creates more severe fire risk

One of the most significant and obvious fire hazards is a matrix unnaturally high in early successional stands. These stands threaten the mature and old forest stands next to them and are most likely to intensify and carry fires and cause the greatest damage. We down here on the ground have all watched plantations torch and move into mature and older stands. There is nothing about the alterations in the Pilot proposal that would significantly reduce the fire hazard it creates when opening up the area and

taking 70-80% of the volume. It more likely puts the riparian reserves at greater risk of burning up. The watershed already has many stands in this condition. Adding more acres and openings is simply adding more fuel to the fire risk. For this reason alone creating more early successional forest is unwise.

4. Logging in Riparian Reserves

According to the Northwest Forest Plan the only reason logging should occur in Riparian Reserves is if it is needed to restore conditions. Further, Riparian Reserves were not only to serve the ACS and aquatic species but were included as protected acres to ensure the viability of a large number of terrestrial and riparian dependent species. This is documented in the March 1993 Viability Assessments and Management Considerations for Species Associated with Late-Successional and Old-Growth Forests of the Pacific Northwest. Consideration of **all** of the purposes and functions of Riparian Reserves including those for riparian dependent, old growth associated terrestrial species assumed to be protected to maintain viable populations is necessary before any reduction in size of reserves are attempted or any logging is justified (Mitigation Step 3 page 269 in aforementioned viability assessment publication).

Currently there is significant scientific debate as to **IF** thinning in Riparian Reserves is beneficial particularly considering these stands go through self thinning and differentiation creating better heterogeneity *and* big trees on their own while the dead wood left behind from the natural process is beneficial for aquatic and riparian dependent species.

5. There does not seem to be a problem with “pre-forest /early successional habitat” as stated by the BLM

We have conversed as friends and neighbors while observing our surrounding forest, and pre-forest landscape in our 5th field watershed. Applying the description by Franklin and Johnson, we find Myrtle Creek Watershed currently has enough if not an overabundance of the “pre-forest” and “early successional” (ES) condition. Betts et. al. (2010) and Spies et. al. (2007) describes a landscape of 3-12% in hardwoods and shrubs with remnant big conifers. There is at least this amount in the Myrtle Creek watershed. Particularly on non-industrial small woodland acreages, the hardwoods and shrubs have not been intensively managed for removal. Since at least \$1 million dollars of our taxpayer’s funds was allocated to work on the Pilots we would like to know why a more meaningful inventory and measure of the actual structural and species composition conditions has not been conducted on the ground in the watershed to determine if the vegetation conditions touted as missing are indeed missing? An aerial photo analysis with ground truthing of the watershed vegetation species and structure on both federal and private land could provide a very good estimate. Instead, all we have received as a response is generalized age class maps and a rationalization that a demonstration of the cutting prescription is needed. It is frivolous to demonstrate how to cut a forest (especially when these kinds of cuts and leave tree scenarios have already been done) while having significant impact on the forest and watershed.

Further, ES species have evolved to be highly mobile in order to take advantage of forest disturbance processes which means that the distribution of ES in the landscape is not an issue. The greater problem is that corporate private lands not only cut out these habitats but spray herbicide chemicals that go onto everyone else’s property. This is an issue that the BLM cannot address but the State of Oregon Department of Forestry could. Or perhaps the corporate land owners might be advised to take responsibility.

The Pilot, developed by foresters not wildlife biologists, falsely states it will restore ES “habitat” using “restoration principles”. These “principles” are not real science “principles” and not wildlife ecology principles. Principles, in the field of wildlife, are based upon a sound body of supporting evidence. In this case there is a large body of evidence that does not support logging of rare mature forest to provide parts but not a functional holistic system of ES wildlife habitat. Jerry Franklin’s statement that wildlife species are “life boated” could not make that more obvious. It also makes obvious a general lack of understanding as to how species maintain populations over time in a dynamic forest landscape. At best, the proposal is poor mitigation for loss of significant habitat structure and rare mature forest conditions.

There will be significant and cumulative impacts to many species of wildlife and their habitat as a result of the proposed clear cutting including impacting what Franklin and Johnson call pre-forest and ES types that they say will benefit or be restored. The Pilot demonstrates a complete lack of understanding of the importance of abundance and continuity of structural conditions that function over long periods of time for many different purposes from early stand development stretching into old growth and over again in relation to restoring and supporting wildlife. For example, primary and secondary cavity nesting species and other species that depend upon the large flush of snags and down logs that come via natural disturbances are the antithesis of Pilot proposed logging to supposedly create ES through removing 70-80% of the forest structure.

Using just one species of bat as an example snags for roosting and maternity colonies are not effectively addressed. How many trees would need to be left in order for one of them to likely become one colony’s bat habitat? How many colonies are needed to maintain viable populations? Particularly in light of diseases like the human introduced white nose fungus that has literally whipped out all populations of species in a state? One of the most significant and basic of “wildlife principles” is that the more habitats you have across an area the more likely species can survive disease outbreaks *and non-native species* invasions. Forestry prescriptions that “mitigate” by deciding a few trees per acre will be left for one colony of bat ignore that the potential that the leave trees will develop the right characteristics are low and at the same time severely limit options to remnant trees while most have been logged and the landscape around it is a corporate timber dessert. This simply continues an exponential diminishment of the ecosystem and is absolutely not restoration. Are the leave trees in the right location? How many trees in a normal forest situation actually develop into the right characteristics?

Consider around 20-30 species of birds, 6 species of bats, 9 species of small-medium mammals, 9 species of amphibians will be impacted and we know the list is not complete. How will you be “restoring” ES habitat for woodpeckers? Maintaining the variety of species in healthy abundant populations supports a functional system considering all the work that they do.

There is a basic conflict in the use and validity of successional classifications as a means to define ecological conditions and processes of wildlife. Wildlife is a part of a dynamic system that is created, maintained and renewed by disturbance processes that establish and maintain structure conditions. It is this structure and the ecological processes and relationships driven by it that are the foundation. Just because one calls something ES and can point to one guild of species that might benefit does not mean ES is restored. Avoiding twisting intentions that lead to creation of false meanings that disrespects the public and dishonors public trust could not be more needed and valued.

Natural disturbance keeps all of the structure in the forest (except the smaller materials) when “pre-forest” habitat conditions are created. The large natural flush of wood structure is proven to be critically important for keystone complex species feedback loops and trophic pathways that all of the

wildlife species are involved in including many plant, animal, fungi, lichen, relationships. This dead tree structure is THE most significant and least abundant condition in the watershed. The Pilot severely reduces keystone components that support wildlife and ecological processes.

Franklin and Johnson suggests that they are restoring early habitat conditions. We observe that they are making matters worse. Therefore the BLM must provide substantive information as to how all of the ES species populations and those species that would still be present with natural amounts of dead wood if will be restored from this logging proposal and measures of how it will specifically increase population capacity and potential in the future. This should include the landscape conditions of surrounding private lands. We believe the proposal will increase long term cumulative impacts since removing most of the forest structure will retard recovery for an additional 80 - 100 or more years just when these mature stands arrived at the beginning of the gap stage to produce more structure to put components back into the system.

Considering the dearth of information and empirical data on the proposed action, with data free assumptions, we support Betts et. al. 2010 statement that “before detailed management recommendations can be made, experimental studies are required to confirm and add precision to our results”². The responsible approach with this kind of proposal is to conduct it as an experiment and relocate it to the Little River Drainage which is set up as an Adaptive Management Area for such experimentation. Otherwise there will be no valid means to assess if the assumptions, purpose, objectives were correct and adjust accordingly.

In review of the literature the majority of others who have actually studied the question as to what if anything is needed to address ES habitat; do not support loss of one rare habitat (intact mature forest) for another, (ES). Instead they call for “Maintenance and enhancement of habitat for species that use ES stages and broadleaf vegetation may best be achieved by implementing alternative management strategies early in stand development. For example, controlling density at an early age, before canopy closure, can help to maintain diverse stand composition and structure throughout the life of a stand, and can preserve future management options” (Betts et. al. 2010). In fact most of these studies have found significant variations of species response in relation to elevation and local conditions which further supports that before any action is taken a reasonable inventory of local landscape conditions and likely species response would be needed.

Based upon personal communications by Cindy Haws, wildlife biologist with a number of other well known wildlife scientists and ecologists in Oregon, they do not agree with Franklin and Johnson in regard to the proposed treatment to restore ES. Dr. Robert Anthony and Dr. Dennis Odion suggest that there has been a misapplication of studies and what is needed to restore forest ecosystems in a holistic manner. From the very beginning of the Pilot process it was requested that other scientists be brought into the process and was denied. That speaks volumes.

There is no point in destroying one rare habitat (mature forest entering into gap phase age 80-160) to create an oversimplified version of another. There are hundreds of acres of already simplified ES in young age classes to improve. As stated often in the literature, it is suggested that those stands already

² Thresholds in forest bird occurrence as a function of the amount of early-seral broadleaf forest at landscape scales M. G. BETTS, 1, 5 J. C. AGAR, 2 J. W. RIVERS, 1 J. D. ALEXANDER, 3 K. MCGARIGAL, 4 AND B. C. MCCOMB

in an ES habitat be treated: "If broadleaf components remain in existing plantations, it may be possible to enhance and restore them through active management" (Bailey and Tappeiner 1998, Spies et al. 2007a).

Last year during another Pilot effort the BLM demonstrated how thinning prescriptions were being conducted. Hardwoods were always cut out in favor of conifers and an even spaced condition maintained a low understory development stem exclusion phase. Looking at the BLM thinning proposals for 2011, we would be interested in knowing how many of those treatments will continue like the past treatments or have they been changed to retain hardwoods, encourage shrubs and enhance stand heterogeneity?

It is important that the agency recognize that here is a foundational problem with the use of successional stages as a guidepost for what is and is not functional forest conditions. This has always been a problem since it does not work for wildlife ecological relationships or any group of organisms because of its oversimplified nature. As Andy Carey (2004) states, "In other words, the physical character of a stand has more bearing on squirrel abundance than its supposed seral stage". This is true of all wildlife species and continues to get misapplied by forestry applications.

A considerable number of small woodland owners have retained the ES structure Franklin and Johnson speak about including members of this Partnership on our forest land. Therefore there is considerable hardwood and shrub structure on forest stands and the species populations identified as a concern are known to be present in these structurally diverse ES stands (personal experience of professional wildlife biologist living in the watershed and experienced birders).

We would like to know why the BLM has not considered going into the 0-30 year old stands already clear cut and extending pre-forest habitat components by thinning down the unnatural, high fire risk heavily planted Douglas fir trees favoring hardwoods which would be the most cost effective means of meeting the purpose of the Pilot? Local employment of Myrtle Creek citizens could be increased in offering contracts to do the work having a much more direct and significant impact upon the people who are most affected by rural economic conditions.

6. Climate Change

We recognize and are concerned about climate change. However, to date the BLM, Franklin and Johnson are using generalized extrapolations from analysis of very different geographic regions with no real data for this area as to how climate change will affect these forests. There are other descriptions from climatologists that conflict with Franklin's supposition. While strong signals are being observed in other places the idea that this area will experience those same conditions has not been established. It is dangerous to assume as Jerry has that changes to forest species composition will occur and then go ahead and change them in our management. This is obviously deterministic without any evidence. Jerry is suggesting management toward a dryer Ponderosa Pine and Incense Cedar forest. This kind of forest which completely changes forest floor conditions would have huge impacts upon species such as amphibians that have survived in this area even through the last ice age. This last year's and this year's weather is the kind that has actually encouraged the kind of forest composition and development we currently have.

The main point is that there is not the same signal or information as to how climate change will affect our local forests. But what we do know is that our forests have been found to be one of only 3 of the

top carbon storage ecosystems in the world. That suggests we let them do their work and perhaps instead of chopping them down we consider establishment of a Biosphere Reserve. That alone would bring millions of dollars to our communities in tourism.

If an issue should arise there will be ample time to address it with a community that would certainly get involved.