

From: [Roger Brandt](#)
To: [BLM_OR_RMPs_WesternOregon](#)
Subject: Comment letter on West Oregon RMP regarding - community economy
Date: Wednesday, June 27, 2012 1:27:04 PM
Attachments: [BLM Scoping for 2012 RMP - comment regarding economy.pdf](#)

Greetings,

Attached is a PDF version of a comment letter being submitted during the scoping period for the Western Oregon RMP and regards addressing the need for improving the scope and completeness of socio-economic assessments in BLM planning documents.

A copy is pasted below in case the attachment does not open.

Thank you.

Roger Brandt
541 592-4316

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June 26, 2012

TO: Scoping Team - Bureau of Land Management, PO Box 2965, Portland, Oregon 97208
FROM: Roger Brandt, PO 2350, Cave Junction, OR 97523 541 592-4316
rpbrandt@frontier.com
RE: Western Oregon Resource Management Plan

Dear Scoping Team for Western Oregon Resource Management Plan (RMP)

The BLM asked: *How can BLM lands contribute to local economies and support local communities?*

When the Western Oregon Plan Revision (WOPR) was produced there was a statement made in the content that I thought invalidated the document's projections for job creation. The new RMP must address this issue to avoid misleading the public about how forest management is benefitting O&C communities.

The statement was in the closing paragraph of chapter five or six and said the following (paraphrased from memory):

The creation of timber jobs will result in the loss of jobs in other sectors of the economy and the loss of jobs in these sectors is expected to be greater in the southern part of the state.

I live in the southern part of the state so, of course, this caught my attention.

I inquired what jobs were expected to be lost and what sectors of the economy would be impacted and received no reply from the BLM. Personally I don't think anyone had the slightest idea although I suspect the industries that the BLM was referring to include the

tourism, hospitality, recreation, and real estate industries.

The BLM and many politicians held up the WOPR as a model plan for creating jobs even though not a single person among them appeared to have any idea if there would be more jobs lost in these other sectors than would be created for the timber industry. In essence they were using incomplete information provided by the BLM and in using this information were misinforming the public. Pernicious in appearance - illogical in practice.

What can be done to provide more reliable job creation estimates?

The new RMP must require all planning documents produced within the districts covered by the Western Oregon RMP to provide a COMPLETE ANALYSIS of economic benefits and impacts from all proposed forest management projects.

The new RMP cannot allow incomplete socio-economic analysis's that begins and end with the single objective of determining how much money the timber industry is going to make and how many jobs will be created for the timber industry. All analysis must help the reader and community stakeholders understanding the potential impacts of timber sales on other forest dependent industries to include tourism, hospitality, real estate, recreation, fishing (anadromous fish that are important for ocean based fishing fleets)) as well as the impact on property owners within management view sheds whose property values may be impacted (which also impacts the ability of realtors and brokers to sell property and generate a living), and the ability of communities to retain the quality of life values they need to market themselves to attract business development (= job creation), retirees with retirement incomes (spending supports service and retail jobs), and home-based entrepreneurs and service providers who conduct business via teleconferencing and internet (self employed people count as jobs and their spending supports service and retail jobs).

In this very simple assessment, it appears to me that the potential for job creation in these sectors are far greater than the timber industry could possibly sustain and so it seems fair to conclude that if the only objective of BLM forest management is to create jobs for the timber industry it will clearly result in a loss of jobs in other sectors as was predicted in the WOPR.

The BLM needs to understand these trade-offs to avoid the risk of undermining the economic stability of O&C communities by implementing job creation strategies that inadvertently destroy a greater number of jobs than are created. More important, these trade-offs need to be clearly disclosed to the public in all activities that alter the landscape on BLM lands.

The bottom line here is there is a significant economic sector capable of generating jobs and introducing income into the community that hinge on the quality of life values produced by BLM managed forest lands to include visual resources, recreational opportunities, and water quality. For the BLM to be an effective management agency moving forward into the 21st century and achieve the objective of *contributing to local economies and support local communities*, the RMP must recognize VISUAL RESOURCES, RECREATIONAL OPPORTUNITIES, and WATER QUALITY as *FOREST PRODUCTS (Timber* Products if the word "timber" makes more sense to you) that are essential for creating jobs and contributing to the economy. If the BLM gives no consideration to how O&C forest lands are managed so they assure these lands contribute the products that tourism, recreation, hospitality, real estate, and other economic sectors need to thrive then the economic stability of O&C communities and industries can be expected to suffer a corresponding impairment in their ability to create a stable economy and diversity of jobs. This is an outcome that directly opposes the PURPOSE of timber management as stated in the O&C Act - *contribute to the economic stability of local communities and*

industries.

Another thing that is missing from BLM economic estimates

I may be wrong but I don't recall ever seeing an economic analysis that includes in its cost-benefit analysis an estimate on the cost of restoration, fire control, and impacts to anadromous fish populations (eg; salmon) in streams as it relates to production of fish for ocean based fishing fleets. For example, in the WOPR, some of the harvesting was described as clear cutting (a different term was used but the description described what I have always called clear cutting - down to the bare ground, nothing standing logging) but I don't recall any estimate on how this might burden society, especially future generations, with the responsibility of paying the cost of environmental restoration, weed abatement, and fire control.

It is no secret in southern Oregon that once you remove the canopy that shades the ground there is a community of shrubs and seeds waiting to grow. I have seen growth of latent shrubs sprout up to two to three feet in a single season after a logging operation removed the canopy and within five years the branches of different shrubs merged to create a close-to-the-ground fuel source that became denser and denser every year. Within ten years the density of shrubs in logged over areas can be so thick it is almost impossible for humans and wildlife to traverse. This is an extremely dangerous fire hazard. Someone has to fix this problem.

To fix this problem, I understand that tax dollars must be allocated to reduce excessive fuels, which imposes an unexpected and undocumented financial burden on me and everyone else in the country and in another ten years the thinning has to be done again to reduce the risk of fire destroying 10-20 years of tree growth, which under contemporary BLM management objectives is THE economic resource that BLM managers are forcing this community to depend for our economic future - if this burns up what are we supposed to do? These costs and risks are not added into any economic analysis in any BLM planning document I have seen although these outcomes are imminent.

By not adding these costs into the cost-benefit analysis the BLM becomes complicit with the timber industry to place the economic burden on society. They get the profit and transfer the responsibility and cost to the people of the United States to clean up the mess.

Maybe the BLM isn't doing this on purpose but now that I have written and made you aware of the issue, if you continue it will be very clear to me that the BLM is participating willingly and deliberately to support the transfer of wealth away from people like me, my friends, my neighbors, and my community, our schools, libraries, etc, into the pockets of the timber industry. The BLM has no business facilitating robbery.

To fix this problem, the RMP must require that ALL economic analysis of logging operations must include in the cost-benefit balance sheet a projection of what the future cost will be for stream and forest habitat restoration, fuel reduction management, and an estimate of the millions of dollars that must be spent on fire control or at least projections on what it will cost to retain a fire-ready fleet and staff to administer and operate it. This estimate must include the approximate span of time that it will take for the forest to be restored back to its original condition before logging the stand. As part of all timber sales, require the timber industry to purchase a bond to cover the expenses of restoration, fire control, weed abatement, etc., over that time period. If the logging operation doesn't pencil out as profitable under these conditions then it wasn't a viable proposition to start with.

But the good news is, the forest will continue to grow and increase in value until a profitable proposition can be made with the business owner retaining full responsibility for the present and future impacts that their profit-making will have on the forest. This is, after all, fair. And there is no reason why the future cost of restoration and management of fuel loads and threat of catastrophic fire cannot be reduced by owner/operator if they adopt more conservative harvesting practices that retain the canopy and minimize impacts to the watershed. By adopting these conservative methods, logging interests can reduce the cost of restoration and fuel reduction, the overhead will be less expensive, and profits will be adequate for sustaining their business.

The RMP must be written to manage timber sales so the cost remains fully on the bidder and not a single cent gets passed off to society.

Sincerely,

Roger Brandt

*In this comment letter I use both the words timber and forest, which to me mean the same thing but may have a different meaning to the BLM reader. To clarify how I use these words I provide my "definition" of these terms here: Timber and forest are both terms I use for productivity on BLM lands. I see productivity from a diverse perspective to include production of logs, wildlife and vegetation that are useful as food, recreational opportunities to include shade, bird watching, swimming, etc, and resources such as scenic landscapes that make a community marketable in multiple sectors of the economy. I understand that all of these forest/timber resources have an economic value in one way or another and can be used to diversify the economy and create jobs. When you see me use the word forest or timber, I am talking about all the potential economic values that can be produced on BLM land. This includes any comments I might make about habitat restoration or improving water quality because diverse wildlife populations and healthy rivers are both marketable assets for the tourism and recreation industries as well as increase quality of life in the community, which makes it more marketable to the traveling public, makes real estate in our communities more marketable, and increases our ability to attract business development. The term "timber industry" as I use it refers to the entities that extract logs and make dimensional lumber, wood chips, and other wood fiber products.