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To: [Brown, Mark A](#); [BLM_OR_RMPs_WesternOregon](#)
Subject: planning process - comments
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Comments to BLM on planning process
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Dear Bureau of Land Management;
I will preface my comments with a couple of KEY observations:

Past forest analysis has failed miserably. The evidence is found everywhere in busted rural forest communities, ecosystems in desperate need of restoration and social contracts stretched to their limits. We can no longer simply pass all the liabilities from our 'short term' profit emphasis onto future generations without expecting a serious and critical response. As the costs and liabilities mount, it seems agencies, forest scientists and managers continue to refuse to connect, management causes with management effects! This disconnection and denial prevents us from making ANY progress toward real and sustainable solutions.

Any real solution must simultaneously address environmental, economic and social issues, consequences and costs. Unfortunately I see no evidence in either the Forest Service nor BLM that this is being pursued, even when bringing it up in conferences, roundtables and any other venue which attempts to address our predicament. The past efforts to understand from a holistic perspective are pitiful, insufficient and self-serving. Consequently our attempts at redemption always fall short.

The problems we face are classically identified by Albert Einstein when he said, "we cannot solve our problems with the same thinking we used when we created them". Unfortunately, your planning typically refuse to understand much less acknowledge this. You need to start over and address 3 questions:

- 1) Show that you understand, can articulate and think holistically regarding past management and present consequences. Connect the dots, identify lessons learned and incorporate that analysis in your efforts to find solutions.
- 2) Insure that all analysis and solutions effectively address the triple bottom line: environmental health (or lack their of), economic vitality (our reality is opposite to vitality) and social equality where present and future generations get to co-equally benefit from a inter-generational shared resource perspective.
- 3) Return to the wisdom of Gifford Pinchot, who stated the mission as, "providing the greatest good, for the greatest number for the longest time". We must realize that past history (within my life time; 62 years – 3 generations) has seen the biggest "blow out" sale of natural resources ever. The consequences of this 'binge or drunken mentality' will substantially undermine our children's ability to enjoy 1/3 of the benefits/resources we enjoyed while dealing with 100% of the liabilities.

Just because we assign no value to intact Eco-systems doesn't mean they don't have value. Biosphere II gives insight into ecosystem value, when 200 million dollars could not support 14 people with symbiotic

ecosystem services for 2 years. Extrapolate that experiment to 7.5 Billion and what results? Could those numbers provide some insight into the value of our "Eco-systems"?

Trees sequester carbon; big trees a lot (1 Acre of Old growth = 1000 tons per acre) and little trees a little (plantations 125-150 per acre after a long and slow increase as mass growths)

So why are you cutting alive and big trees at all? Given the serious over cutting and conversion of a multi age, species and composition forest into an unstable even age plantations with their legacy restoration needs how do you not see your management is entirely counter-productive?

Add up all your management costs for increased cataclysmic fire, erosion, invasive species, disease and insects, busted rural communities, plus all costs for roads, logging, infrastructure, and energy. Put those numbers into a graph that creates past trends and projected future trends and anticipate how we can meet future wants and needs? Looking backward I see my grandfather working in the Timber/lumber industries most of his life. He had an 8th grade education and had houses, boats and vacations. The American dream was possible then.

Today, it's entirely different. We face declining revenues and increasing liabilities. To ignore this perpetuates nothing less than inter-generational suicide.

Other points include:

1. Adhere to the Northwest Forest Plan guidelines. Protect and ensure the health of our watersheds and to provide clean water for our communities.
2. Increase environmental protections for old-growth and mature second-growth forest habitat. Absolutely no more conversion of old growth to plantations, anywhere!
3. Assure adequate federal environmental monitoring and protections for all endangered species.
4. Preserve and increase the amount of BLM land dedicated to providing wildlife corridors for endangered and at-risk species, while ensuring that no more 'fragments' will e created ever again..
5. Ban regeneration harvests (clear-cuts) and steep slope logging.
6. Ban the use of pesticide and herbicide spraying in our watersheds.
7. Maintain federal control and regulation of the O&C lands currently managed by the BLM. Do NOT relinquish management of BLM lands to non-federal agencies or private concerns as suggested in Congressman Defazio's O&C Trust, Conservation & Jobs Act (O&CTCJ Act).
8. Work on legislation to overturn the 1937 O&C Act which mandates our forests are to be managed as timber plantations.
9. The BLM should actively seek and promote other sources of revenue for our counties to replace timber sales such as:
- 10) BLM should support legislation for an increased severance tax ("harvest tax") for large industrial timber owners, and increased property taxes for large timber owners, who currently pay minimal property tax and receive large rebates in the form of credits, refunds and incentives.
- 11) Seek increased revenue from recreational use not by simply raising fees, but by actively promoting BLM forests as educational resources and for eco-tourism, leading hikes, camping, etc.
- 12) Actively managing to create habitat for non-forest timber products such as mushrooms, edible plants, medicinal plants, decorative greens;

13. The BLM should tighten local milling requirements for timber harvested from its public lands to increase domestic jobs, which are lost when logs are minimally milled and exported. Create a value added- bid index so the more jobs created the less the stump age costs.

14. Offer thinning sales in small units which would be accessible to/and affordable by local small timber operations without access to expensive equipment.

15. Study and employ other methods of timber harvesting that focus on the sustained health of the forest instead of the sustained amount of board feet harvested.

Thank you for this opportunity to comment. Comments and/or responses are welcome

Regards,
Craig Patterson