

The Bureau of Land Management's Western Oregon Plan Revision violates the Sustained Yield Act of 1960 which defines sustained yield as "even-flow, non-declining yield" That means: Old growth trees could not be cut faster than other larger trees grew to replace them. The harvest of mature trees would not decline. Now the O & C lands are under their own statutes but they are still federal forests and the BLM should honor the even-flow, non-declining yield provision.

Furthermore, the narrowing of riparian zones along with erosion caused by clear cutting, will destroy fish and wildlife habitat. This habitat is not only important to fish and wildlife, it is important to Oregon's economy which is pointed out in the article quoted below along with other reasons this plan should not go forward.

## **BLM logging plan likely won't work**

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Oregon's old-growth forests produce much of value: clean water, fish and wildlife habitat and world-class recreation, to name a few. However, the Bureau of Land Management's Western Oregon Plan Revision puts money at center stage, claiming that tripling the volume of clear-cut logging in old-growth forests will bring an economic windfall. It isn't true.

The proposed harvests under the WOPR are intended to promote the economic interests of counties that share income from the sale of federal timber. However, there are six reasons why the BLM's actions are unlikely to accomplish this result — and, in fact, are more likely to pose threats to the economic engine that really drives Oregon's prosperity.

First, the logging industry has always been on a boom-and-bust cycle. Right now there's a bust, but the BLM bases its revenue forecasts on a perpetual boom. The BLM's stumpage forecasts are based on 2005 prices, the highest in many years. Now, the sub-prime mortgage crisis has lumber producers reeling, and stumpage prices have fallen by as much as 50 percent. The U.S. Forest Service recently reported that current stumpage prices do not cover its administrative and post-harvest restoration costs.

Second, the BLM is unlikely to meet its timber volume targets. Harvest

quantities are unstable because of market cycles and public opposition to old-growth logging. As Mike Dombeck and Jack Ward Thomas, both former chiefs of the U.S. Forest Service, noted in a 2003 guest column in *The Seattle Post-Intelligencer*, “harvest of old growth will be publicly resisted” and the “costs of making old-growth timber sales are disproportionately high with very low chance of ultimate success.”

Even without its proposed WOPR harvests, the BLM has a problem. In 2007, the BLM’s Medford District attempted to offer 57 million board feet, much of it from old growth, but only 5.3 million was actually available for harvest at year’s end. In contrast, the Siuslaw National Forest has bid out every timber sale by focusing on restorative thinning of young forests, attracting timber companies, providing jobs and enhancing ecosystems.

Third, the market for the large logs BLM proposes to harvest from old growth is limited. Most Oregon sawmills have retooled for smaller trees obtained from plantations and thinning. As Eric Hansen, Oregon State University forestry professor, notes, “The mills shifted their manufacturing strategy to streamline production. They can process small logs more quickly and effectively than larger logs. As a result, many Oregon saw mills won’t accept large logs.”

Fourth, the BLM’s proposed increased harvests will add to the timber supply and depress stumpage prices. As the BLM acknowledges, other forestland owners are likely to respond to lower stumpage prices by decreasing the amount of timber they offer for sale. The combination of lower timber volumes sold and lower prices will mean less revenue for owners of industrial and nonindustrial forest lands, the U.S. Forest Service, the Oregon Department of Forestry and Native American tribes.

Fifth, the BLM’s proposals to clear-cut old growth and narrow stream buffers threaten the natural amenities contributing to a strong, sustainable economy in Western Oregon. Old-growth forests, clean water, high-quality environment, and outstanding recreational opportunities drive Oregon’s prosperity by attracting businesses, workers and retirees with investment and retirement income.

Sixth, the BLM’s actions threaten the many values provided by carefully managed and protected forests, including clean water, abundant wildlife, and

recreational opportunities. U.S. taxpayers spend more than \$40 million each year to recover Willamette and Coast Range steelhead and salmon stocks. Each wild fish caught is worth an estimated \$200 to sportsmen.

Less obvious values threatened by the BLM proposal include biodiversity protection, fertile soils, storage of climate-regulating carbon, and the ability to pass some intact old growth forests on to our grandchildren. Based on research conducted at Oregon State University and published in Science in 1990, the BLM's preferred alternative would result in the loss of more than \$88 million in stored carbon from clear-cutting and building more permanent roads. As Dombeck and Thomas note, the values from preserving old growth for our grandchildren are "as real as those determined by commodities in the marketplace and clearly exceed the values as timber."

Providing funding for rural Oregon counties is a worthwhile goal. But tying funding to the ups and downs of the logging industry is dangerous and unlikely to succeed.

It is far better to let our old-growth forests attract and retain residents and provide clean water, wildlife habitat, recreation and other natural dividends than to gamble them on the BLM's risky scheme.

The BLM should follow the modal of the Siuslaw National Forrest and leave old growth stands alone.

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