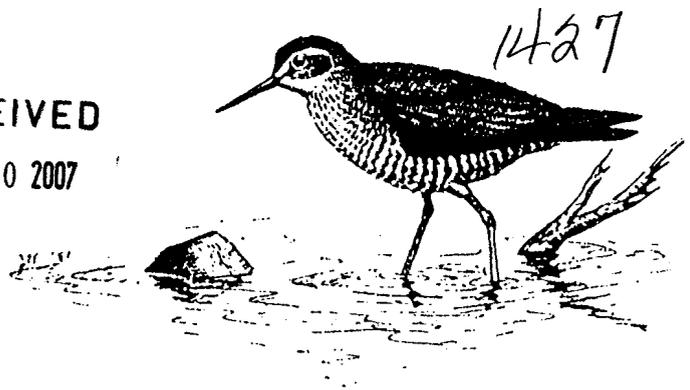


# Cape Arago Audubon Society

P.O. Box 381  
North Bend, Oregon 97459

RECEIVED

DEC 20 2007



December 12, 2007

Bureau of Land Management  
Western Oregon Plan Revisions Office  
PO Box 2965  
Portland, OR 97208

Dear Mr. Shepard:

The members of Cape Arago Audubon Society in Coos County are very concerned about the consequences of the huge increase in timber production proposed in your Western Oregon Plan Revision. Our 250 members live and work in the county, and they bird-watch, hike, fish, camp, and otherwise enjoy the surrounding natural areas. As a chapter of the National Audubon Society, we join in their mission "to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity." This mission is not far removed from that of BLM to "sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations." We are concerned that in this proposed revision BLM is defining productivity in the narrowest possible way and abandoning the commitment to health and diversity—a commitment that has grown progressively since the 1970s with the support of the public as well as past BLM directors. When BLM celebrated its 50th anniversary in 1996, Director Michael Dombeck said, "Conserving and restoring America's lands and rivers is central to everything we do." In 1998, Director Tom Fry said, "The Bureau must act before threatened watersheds and riparian areas deteriorate to the point where they are beyond recovery." Previous Resource Management Plans reflect BLM's commitment to a balanced policy. In fact, the 1995 plan for the Coos Bay Region addressed the requirements of the 1937 O&C Act this way: "The [1937 O&C] Act does not require the Secretary [of the Interior] to harvest all old-growth timber nor all commercial timber as rapidly as possible or according to any particular schedule."

We recognize that you have been required to draft a plan that includes an analysis of management exclusively for timber production, but we question whether you have offered a range of alternatives that encompass the full potential of strategies appropriate to meeting the purpose and need outlined in your Draft Environmental Impact Statement. We also question whether the proposed alternatives can meet the requirements of the Endangered Species Act, Clean Water Act, and Clean Air Act.

Following is a list, organized under the categories presented in your Draft EIS, of severe problems associated with the proposed plan revision.

## **Purpose and Need**

Defining the purpose and need in the narrow terms BLM has chosen does not seem justified by the settlement agreement or the major court rulings as set out in Chapter 1 and Appendix A of the Draft EIS. For example, although the *Headwaters, Inc. v. BLM* ruling contains specifics about timber harvesting, we note the statement "...Second, the O&C Act was

intended to halt previous practices of clear-cutting without reforestation.” And the three other cited cases all seem to speak for interpreting the act in broader terms of conserving species habitat while addressing the need for more timber production.

### **Socioeconomics**

Providing the raw material for increased timber production to benefit the counties will not guarantee sustained yield unless standards are set for how, where, and by whom the wood will be processed. Will qualified local foresters, loggers, and contractors be employed? Will they establish long-term, stable employee–contractor relationships, giving preference to local workers, and reinvesting and spending their money in the local communities?

Judging what the market for timber will be requires updating, as the end of 2007 has brought a slowdown, with local layoffs and unforeseen incidents such as the discontinuance of train service affecting firms in Coos County and elsewhere.

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Increasing the acreage of Class IV visual resource management areas by significant amounts, as all three alternatives do, could adversely affect counties by lowering quality of life and discouraging tourism.

### **Endangered Species Act**

Relying on possible changes under consideration by the U.S. Fish and Wildlife Service regarding the status of the Spotted Owl and Marbled Murrelet means that no alternatives address how the current threatened status of these two species would be managed. Intact forests should be given special consideration because of their role in maintenance of ecological integrity that provides for survival of these species.

Reducing the nesting habitat of Marbled Murrelets will reduce their population numbers because of the lack of suitable nesting habitat inland. Low-elevation BLM old-growth stands are the major habitat for Marbled Murrelets.

Reducing the habitat of Spotted Owls will reduce their population numbers and, in concert with other factors, could lead to a population crash in areas covered by the Western Oregon Plan Revision. BLM old-growth stands are the major habitat for Northern Spotted Owls.

Not managing special status sites on O&C lands and not surveying for rare plants in the future could cause some species to be listed as threatened or endangered.

Not leaving any snags, down wood, and any green trees will affect species that benefit from this practice, including Purple Martins (special status species) that use snags for nesting in BLM clear-cuts. Reductions in snag retention will seriously reduce habitat for all other cavity-nesting bird species. Reductions in green tree retention will reduce roosting opportunities for a wide variety of bird species.

De-designating and/or allowing logging in Areas of Critical Environmental Concern, such as Wassen Creek (also a wilderness study area) and Upper Rock Creek in the Coos Bay Region, will result in further loss of habitat for endangered and threatened species that is unaccounted for in the plan.

### **Riparian Management Areas**

Reducing riparian boundaries will affect maple, alder, and willow stands that provide important habitat for many formerly common songbird species that are increasingly under threat.

Logging near streams reduces important protections for clean water and Pacific salmon. High-quality drinking water originates on BLM lands for the citizens of many Oregon communities. Salmon need cool, clean water, but all three alternatives in your plan would remove stream buffers that shade streams and keep sediment from the water.

By reducing riparian buffers to standards much lower than currently accepted minimums, BLM is not only forfeiting the leadership role it has played since implementation of the Northwest Forest Plan in improving water quality in Oregon watersheds but is also placing itself in opposition to the U.S. Environmental Protection Agency.

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Reducing riparian management areas under Alternatives 2 and 3 will result in less organic matter added to streams to support the food web, warming of water in non-fish-bearing streams, and potential reductions in shade and large woody debris delivery in fish-bearing streams.

### **Fire and Fuels**

By converting moist old-growth forests to dry, flammable tree plantations, the proposed plan will increase the amount of carbon in the atmosphere and place communities at enhanced risk of uncharacteristic fire.

Salvage logging following fire will exacerbate the damage associated with the disturbance and will also impact natural regeneration, thus slowing recovery.

### **Invasive Species**

Building extensive new roadways that contribute to introduction and spread of invasive species contradicts the Oregon Department of Fish and Wildlife's current Oregon Conservation Strategy, which has as one of its highest priorities the removal of invasive species and prevention of new introductions.

Sincerely,



Eric Clough  
President, Cape Arago Audubon Society