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December 27, 2007

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JAN 02 2008

To: Bureau of Land Management

Re: WOPR

The act that created the rules for O & C lands requires "sustainable" logging. The writers of that document surely expected the forest that would grow back after logging would be a lot like the one that was cut down. By specifically mentioning protection of watersheds and recreation they clearly intended to have a modest annual cut.

It is not practical or legal to expect the northwest forests to be totally centrally managed. Most private forests are going to be intensively managed for maxim timber production. That fact, combined with the desire of Americans to increase wild salmon runs and to avoid species extinctions, means BLM lands, including O & C lands, need to be managed with extra attention to species survival.

One species particularly at risk is the Northern Spotted Owl. WOPR relied on the Draft Recovery Plan for the Northern Spotted Owl in preparing this document. Now that the peer reviews are available, it is clear that this plan is deeply flawed. For example, one reviewer says "Habitat loss due to logging was a primary driver of the original listing decision, and new habitat has not regenerated faster than subsequent logging has decreased habitat amount (p. 130), so there is no reason to exclude logging as a major current and future issue of concern to owl recovery." In fact, all four peer reviews found the Draft flawed. WOPR needs to be based on an accurate assessment of what is needed for Spotted Owl recovery. The final Recovery plan has yet to be written, but it will almost surely show a requirement for large blocks of old growth trees.

Another huge scientific flaw in this analysis is (page 491) "The analysis assumes no change in climate conditions..." While it is difficult to predict exactly what will happen, enough is known to say it will be warmer. This will lead to more precipitation falling as rain. It will also speed spring melt of snow packs. Assuming "no change" in climate give us a useless analysis.

If you have ever driven along the Siuslaw River in September and October when the Chinook salmon are running, you can't miss the recreational aspects of catching salmon. Many of these fish are caught in the lower Siuslaw where there is little BLM land. However, a lot of those fish are born in the upper reaches of the Siuslaw where BLM is the largest landholder. Care must be taken to enhance the survival of all the salmon species that spawn in O & C areas throughout the Pacific Northwest to better meet the O & C Lands Act recreation requirement.

The best way to “do no harm” to species at risk is to mimic natural processes. Assuming that some logging will be occurring on O & C lands, it should be done in a way that mimics natural processes. Fire is one that comes to mind. Fires frequently burn in a mosaic pattern— though obviously not in the strict checkerboard pattern that identifies much of the O & C lands. Usually some trees survive a fire—scattered clumps, large old trees, trees spared by a changing wind pattern. The plan to have 100% clear-cuts as part of the preferred plan (Alternative #2) is a bad idea. The “No Action” alternative leaves 6 to 25 trees per acre. This alone is enough to choose “No Action” over Alternative 2. In addition, the remaining trees should be most like those left after a fire—large stable trees. They can be a mix of commercial and non-commercial, but they need to be the largest trees in the stand.

None of the alternatives have a really good plan for dealing with fire in LSR or LSMA lands. To adhere to the stated “sustainable” goals and to remove the temptation for arson, any harvest of burned timber on LSR or LSMA lands should require that an area similar in age and location be reclassified from matrix to LSR or TMA to LSMA to replace the function that was lost in the fire.

Riparian Management:

Site specific tree height should be used in determining how wide the riparian corridor should be. A 100 foot wide area of some (not full) protection is not sufficient for a site where the trees can grow to 250 feet. This is significantly less than half of the site-potential tree heights in the coast range. I have attached a graph from a talk given by John Richardson November 7th at OSU that shows increase benefit in a number of categories for site potential tree heights well past the .4 which 100 feet represents in the coast range. (See <http://www.fsl.orst.edu/cfer/products/WorkshopPdfs/Richardson.pdf> for more detail.) One site specific tree height should be the minimum everywhere, but in flood plains where the channel could migrate or steep unstable areas where debris flow is possible, the minimum should be 2 site specific tree heights. These are two potential sources of large wood that should be protected.

While the better alternative in respect to riparian corridors is the No Action alternative, other alternatives could be improved by requiring all trees left in the outer parts of the riparian corridor be the largest trees, not just enough little trees to get 50-80% crown closure. Large trees are more likely to impact the stream and large trees would benefit Spotted Owls and the Marbled Murrelet.

All logging should be included to count toward allowable sale quantity (ASQ). There is no reason to allow an “extra” timber cut over the next 20 or so years as plantations are thinned. This undermines the requirement for “sustainable” logging called for in the O & C act.

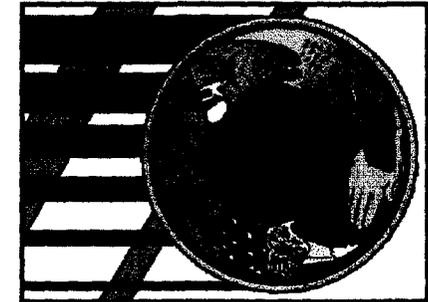
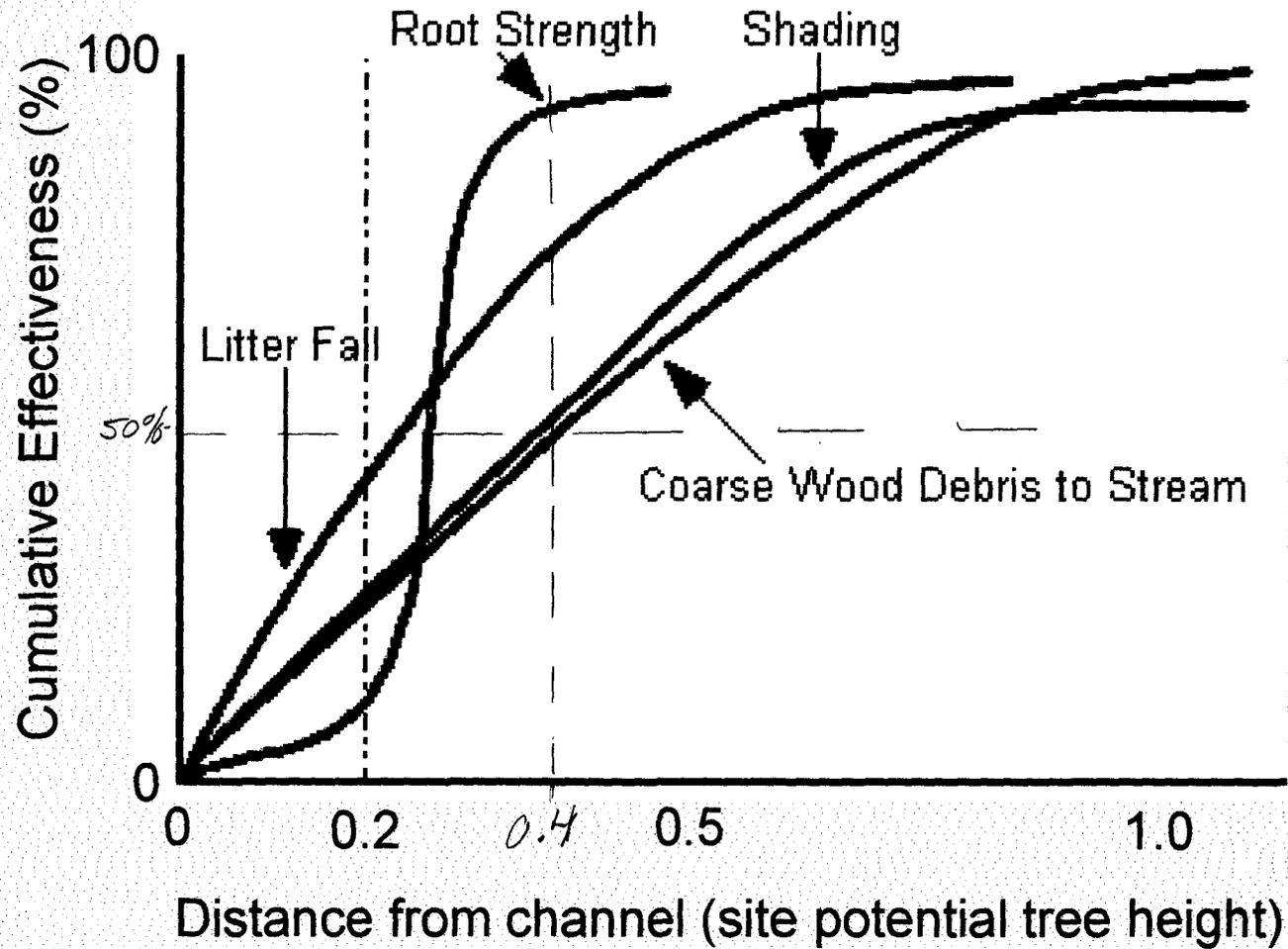
The assertion that increased logging will lead to prosperity through creation of a lot of local jobs is hard to believe. Most crews I see working in the woods (planting and logging) are Hispanic. I would be astounded if many are legal residents. The pay for these jobs is no higher than it was in the late 70's and early 80's when many of my friends and family worked in the woods and in sawmills. These are not the good jobs they once were. Adding thousands more illegal immigrants to do them will not help the economy and could strain local schools and social services.

While I am sure some improvements could be made in how O & C lands are managed, of the alternatives presented, "No Action" is the best. Please select that one.

Sincerely,

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Report of the Forest Ecosystem Management Assessment Team



100 foot foot
buffer with
250 foot site-
potential tree height
= .4