

Bureau of Land Management
Western Oregon Plan Revisions
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To Whom It May Concern:

We are writing to express our disappointment with the Bureau of Land Management's (BLM) Western Oregon Plan Revisions (WOPR) Draft Environmental Impact Statement (DEIS) because significant aspects of the DEIS are based largely on political manipulation and inaccurate scientific and economic projections. While we are fully aware that many Oregon counties have funded social services and road repair from federal regeneration harvesting revenue, we no longer believe that it is valid to destroy our valuable air, wildlife, wood, and water resources in order to run county governments. It is Congress' responsibility to protect U.S. property, and Congress, not the BLM, needs to find new ways to provide funding for counties with high percentages of untaxed federal land.

We are particularly opposed to the BLM WOPR DEIS Preferred Alternative 2, but neither Alternative 1 nor Alternative 3 as explained on page XLVI of the DEIS are substantially better. However, we prefer two of the subalternatives of Alternative 1, which rely on thinning rather than regeneration harvesting on BLM land. Thinning of federal timber, if done carefully, is scientifically and fiscally more responsible than clear-cutting forests owned by American citizens. Alternative 1's subalternative 1 would retain all tree stands over 80 years of age and subalternative 4 would increase late-

successional management areas (LSMA) to include all northern spotted owl (NSO) critical habitat (WOPR DEIS, V.1, p. 102).

Given the U.S. Environmental Protection Agency's (EPA) harsh critique of both the WOPR DEIS and the U. S. Fish and Wildlife Service's Draft Recovery Plan for the Northern Spotted Owl (Draft Recovery Plan), which impacts the WOPR, it is unlikely that WOPR Alternatives 1, 2, or 3 will stand up to legal scrutiny. Therefore, we support the WOPR No Action Alternative as the only plausible WOPR option.

We are neither scientists nor economists; we are neighbors in BLM's Eugene district where the BLM owns land near both of our homes. We are writing with our specific objections to the 1606-page WOPR DEIS as citizens who would be personally affected by scientific, fiscal, or political mismanagement of BLM land. Below please find our concerns, with citations when possible.

- Both the O & C Act of 1937 and the Endangered Species Act (ESA) of 1973 have legal authority with regard to BLM lands (WOPR DEIS, p. A-993). Although the O & C Act states a variety of purposes including supplying timber to and protecting watersheds of local communities, protection of endangered species was not a concern in the early part of the 20th century and was not included in the O & C legislation. We therefore believe the ESA supercedes the older legislation with regard to endangered species. In addition, global warming is a new concern for the U.S., which just this month signed an international treaty acknowledging the need to cut carbon emissions world-wide. Also, on December 19, 2007, Congress agreed to raise U.S. auto emission standards to combat the warming of

the earth's atmosphere. New scientific information in the near future and subsequent legislation concerning global warming will also supercede the O & C Act. It is myopic to use 80-year old legislation to plan forest practices for 2106, as the WOPR does.

- The WOPR DEIS devotes less than one page (out of 1606 total pages) to climate change. The WOPR DEIS "...assumes no change in climate conditions, because the specific nature of regional climate change over the next decades remains speculative." (p. 491). While it is a truism that all future change is speculative until it actually happens, it is also true that the United States currently acknowledges the need to reduce carbon emissions to reduce global warming, as evidenced by (at least) the international treaty and the Congressional legislation mentioned above.
- Since forests absorb carbon emissions, it seems oxymoronic to clear-cut large swaths of remaining federal forest land when other federal regulations are attempting to reduce carbon emissions. Furthermore, the complete environment of the oldest forest biosphere absorbs the most carbon. Andy Kerr, one of Oregon's premier environmental spokesmen, has written that "If one looks at the forest carbon cycle *over time*, clearly the *most* carbon is stored for the *longest* time in old growth forests..."

(<http://www.andykerr.net/EcosysBasedCarbSeques/EBCSpaper.html>).
- The WOPR DEIS states, "... land use allocations under the current resource management plans are not aligned with designated northern spotted owl critical

habitat, and the resource management plans do not include management direction specific to critical habitat units" (p. 285). The WOPR DEIS should not have been released without this extremely important component. Until management plans are aligned with NSO critical habitat, WOPR DEIS Alternatives 1, 2, and 3 are invalid.

- Agriculture Department Undersecretary Mark Rey and disgraced former Deputy Assistant Interior Secretary Julie McDonald both served on the Washington Oversight Committee, which has been accused of manipulating scientific data in Fish and Wildlife's Draft Recovery Plan. In October 2007, 113 scientists asked Interior Department Secretary Dirk Kempthorne to revise Fish and Wildlife's Draft Recovery Plan after investigating the accusations of political interference. Until this possible political manipulation has been independently examined, all suspect scientific evidence in the WOPR DEIS regarding the barred owl and the northern spotted owl must be entirely discounted.
- According to Joan Jewett, Fish and Wildlife's Portland spokesperson, the Draft Recovery Plan is now due to be released in the spring of 2008. Until the Draft Recovery Plan is revised, the BLM will not be able to use the revision to establish NSO critical habitat within the WOPR.
- In letters to Fish and Wildlife, the U.S. Environmental Protection Agency (EPA) has also questioned whether NSO critical habitat follows Northwest Forest Plan standards and whether the reduction of the late successional reserve networks will contribute to the extinction of the northern spotted owl.

- In addition, the EPA has criticized the reduction of riparian zones under the WOPR DEIS, pointing to the fact that the recommended logging under Alternatives 1, 2, and 3 will increase erosion, silt build-up, a rise in water temperature and stream turbidity.
- Subsequent to the recent winter storms in Oregon that resulted in mudslides that wiped out highways and residences, the Oregon Department of Geology and Mineral Industries cited clear-cutting as the cause of these catastrophic events (The Capital Press, 12/20/2007). The extensive regeneration harvesting in the WOPR DEIS on steep slopes will likely produce similar results in areas where BLM lands are near or adjacent to private homeowners and public roads.
- The WOPR DEIS index (pp. 923-925) does not have a listing for the connectivity corridor that links the Coast Range with the Cascades at the very southern end of the Willamette Valley. BLM representatives that we spoke with in both the Eugene and Portland offices mentioned that this is an area of scientific weakness in the WOPR documentation. We were, however, able to find one paragraph in the WOPR DEIS that discusses the "forested bridges" (p. 293) for the northern spotted owl, including the Cottage Grove area where we live. If the BLM clear-cuts much of its checker-board old-growth holdings here, there will be no protection for this corridor that links species' habitat from the South Willamette to the North Umpqua to the Rogue Umpqua to the Ashland area (p. 294). This is a major failing in the WOPR DEIS. A final Environmental Impact Statement must address connectivity for the northern spotted owl and the marbled murrelet.

- **Recent Oregon Department of Forestry documents indicate that Douglas fir stumpage prices have fallen by up to 25%. The log prices estimated in the WOPR DEIS are unrealistic given the 2007 downturn in the housing market and the fact that numerous Pacific Northwest mills are on temporary layoff or have shut down for good. The log prices as projected in WOPR DEIS are therefore unrealistic in their projections for county payments.**
- **BLM's economic analysis has been challenged by many sources. With regard to processing, there are only a handful of mills in Oregon currently capable of taking large logs from trees over 80 years old. It is unlikely that there would be significant investment in old-growth mill capacity for a very limited supply over a short period of time, especially when the possibility of future legislation or lawsuits could eliminate the cutting of federal old-growth forests at any time.**
- **Neither federal timber payments nor the Secure Rural Schools legislation have provided sustainable income for western counties in recent years. We support finding a different approach that does not pit the last remaining stands of ancient trees against the need for county services such as pothole paving, drug rehabilitation, or rural sheriff patrols.**
- **Alan Hoffmeister, the Portland spokesperson for the BLM WOPR DEIS, has estimated that at least a million dollars has been spent on the public comment process, including specifically hiring Alan Hoffmeister as a spokesperson; contracting with Carrie Fox of Daylight Decisions in Portland for website design and public comment collection; contracting with Gary Light of ICF in Colorado for**

final processing of comments; and paying for BLM vehicles, badges, belts, buckles, socks and guns (and maybe tasers.) All these expenditures could have kept the libraries open in rural counties and provided social services to our communities for years to come.

- Why do people move to the Pacific Northwest? Is it because they want to live next to regeneration harvests? Do they want to hike through slash piles? Do they want to breathe smoke-filled air? Do they want to kayak down muddy, debris-strewn rivers? Do they want erosion, floods, and mudslides on their streets and highways and in their living rooms and basements? Or do they move here because they want to live near pristine forests abundant with multiple species, clean rivers and streams that provide drinking water and recreation, and fresh air rather than smog? We think further development of communities in Oregon depends on the latter.

Thank you for your attention to our comments.


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cc: Senator Ron Wyden
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