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January 5, 2008

Bureau of Land Management  
Western Oregon Plan Revisions Office  
333 SW 1st. Avenue  
Portland, OR 97208

Dear Bureau of Land Management.

I live and farm in the Little Applegate Valley and am shocked and appalled at the Western Oregon Plan Revisions to the Northwest Forest Plan of 1994 (WOPR). I find the proposed plan totally irresponsible and unacceptable.

The proposed plan revision threatens watersheds throughout all the BLM managed lands. It threatens already threatened and endangered species, it contributes further to global warming and is both socially irresponsible and immoral. Those behind this proposal should be relieved of their duties and replaced immediately. Has United States Department of the Interior Order Number 3226 which was signed into law on January 19, 2001 by Secretary of the Interior Bruce Babbitt been considered? By the looks of things, it does not appear so.

Fortunately, there remain professionals who have not sold out to private interests who are attesting to the fact that WOPR is fatally flawed. A letter (attached) written by Ron Sadler of Coos Bay, a retired chief of forestry planning for the BLM recently publicly stated that the plan is seriously flawed is only one example. Here is a man who worked to implement the National Environmental Policy Act and has testified as an expert court witness on lawsuits involving that Act. As a lay person I know that what is being proposed is a criminal. As a farmer, I know what is being proposed is disaster.

Even the EPA has publicly noted their concerns about the plan. See attached newspaper article.

I am not against sustainable logging. However, as an avid backpacker and hiker my entire life living in the Pacific Northwest I have seen vast old growth forests disappear into clear cuts. I have seen the devastation that these practices leave and have left behind decades later. I am insulted that the WOPR document calls clear cutting "regeneration harvesting." I am insulted that BLM calls its logging projects landscape restoration projects, when in reality the BLM auctions off timber to contractors who enter roadless and pristine wilderness areas with machines of death and destruction. Often these contractors are not supervised or held accountable.

The act of logging riparian areas and clear cutting old growth forest while calling it a "Landscape Restoration Project" is a sin. I call these activities Landscape Destruction Projects. It is time for the lies and other deceptive practices to be stopped. It is no secret that our environment is in crisis and it is time to wake up and take action. It is time for BLM to be honest with the public who owns these lands and responsibly care for these lands as the public dictates.

There are tens of thousands of comment letters on file being ignored by the BLM as I write. The time is long past due to create only sustainable logging projects in the dense plantations that need thinning. It is a fact that almost every mill in the state of Oregon has already re-tooled for smaller timber. Why should the America citizens who own these lands and all future generations pay because some greedy, ignorant, foolish, and blind individuals want to cut down the last old growth forest **for a short term gains**. Furthermore, **the proposed WOPR allows for the breaking laws as multitudes of species are killed off forever**. This activity is short sighted, ignorant, and should have been halted in its tracks decades ago. People should be going to jail over this, instead of being rewarded with ancient trees for their obsolete mills. The private timber industry knows how to sustainably manage their tree farms, why can't BLM learn from them and leave the rare and invaluable remaining old growth for all posterity.

The Bureau of Land Management only manages timber lands in the Northwest and as seen in the 1600 plus page document has proven to be simply not aware of the environmental protection laws in force or good forest management practices available. Therefore, I feel that these lands should immediately be turned over to the Forest Service so that they can be integrated with those lands into a reasonable Forest Management Plan. Furthermore, it is time to repeal the 70 year old O & C Act which is in conflict with modern day needs and law.

Thank you for you attention.

Sincerely,



Richard Anderson

cc: cc: Senator Ron Wyden: 1220 SW 3rd Ave., Suite 585, Portland, OR 97204  
Senator Gordon Smith: 121 SW Salmon St., Suite 1250, Portland, OR 97204  
Rep. Peter DeFazio (D-4th): 405 East 8th Ave. #2030, Eugene, OR 97401  
Rep. Greg Walden (R-2nd): 843 East Main Street, Ste 400, Medford, OR 97504  
Rep. Earl Blumenhauer (D-3rd): 729 N.E. Oregon St., Suite 115, Portland, OR 97232  
Rep. Darlene Hooley (D-5th): 315 Mission Street SE #101, Salem, Oregon 97302  
Rep. David Wu (D-1st): 620 SW Main, Suite 606, Portland, OR 97205  
Rep. Dennis Kucinich (D-Ohio) 7904 Day Drive, Parma, Ohio 44129

The following are copies of letters and articles cited:

<http://www.registerguard.com/csp/cms/sites/dt.cms.support.viewStory.cls?cid=21258&sid=1&fid=1>

## **BLM timberlands draft is a failure**

**By Ron Sadler**

Published: Tuesday, November 13, 2007 in The Register Guard (Eugene, Oregon)

The draft environmental impact statement for the revision of resource management plans governing Bureau of Land Management lands in Western Oregon is out for public review. It comes in three volumes, and weighs almost 10 pounds.

Given the wealth of data and analytical tools available, as well as lessons learned over the past decade operating under the Northwest Forest Plan, the BLM's draft statement could be and should be a paragon of logic and compliance with the intent of the National Environmental Policy Act.

It is not.

A review of the draft leaves one with the distinct impression that the BLM has carefully narrowed the description of the purpose and need for the plan revision in an attempt to justify limiting the subsequent consideration of alternatives to an extremely small range of options, all of which are variations on a preselected theme.

The BLM states that the purpose and need for a land use plan revision is to find a way to "conserve habitat needed from these lands for the survival and recovery of species currently listed as threatened or endangered under the Endangered Species Act."

For more than 20 years, the BLM has been attempting to integrate the requirements of the Endangered Species Act with the timber-oriented O&C Act of 1937, which relates to Western Oregon lands once owned by the Oregon & California Railroad that are now managed by the BLM.

It has attempted to do this by considering only the needs of those species formally listed as threatened or endangered.

The BLM has failed to learn the futility of this minimal and piecemeal approach, even though the abject failure to maintain timber production under the Northwest Forest Plan is ample evidence of its inadequacy.

The BLM refuses to recognize that the scarce resource is not spotted owls, marbled murrelets or any of the other 300-plus plants and animals associated with old growth timber that are awaiting their turn to jam the timber production machinery. The scarce resource is the old growth ecosystem itself.

The real need is for the BLM to:

Recognize the scarce nature of functioning old growth stands across all ownerships within Western Oregon.

Determine the role to be played by the remaining remnants of old growth on BLM lands in order to meet the primary purpose of the Endangered Species Act, which is the conservation of the ecosystem upon which endangered species depend.

Seek ways to integrate the ecosystem requirements of the Endangered Species Act within the timber production mandate of the O&C Act.

Once the purpose and need for a plan revision is correctly and properly described, the BLM could then move on to develop a comprehensive and realistic range of alternative ways to serve the stated purpose and meet the identified need. That need then could be analyzed in full accordance with the letter and intent of the National Environmental Policy Act, the 1969 law that created the environmental impact statement process.

Although the act states that an environmental impact statement even for "proposals of unusual scope or complexity shall normally be less than 300 pages," the BLM is offering the public 1,606 pages. Those who don't have the time or inclination to review all of those pages can at least let the BLM know they expect a legitimate, comprehensive and professional planning effort, not a narrowly focused, truncated attempt at justification of a pre-conceived idea. The agency will accept public comments until Jan. 11.

Only a planning effort that effectively addresses the role that BLM lands realistically can and should play in maintaining a viable distribution of the old growth ecosystem across all ownerships throughout Western Oregon has any hope of maintaining a predictable and uninterrupted flow of timber from the O&C lands.

Unless substantive changes are made between BLM's draft and final environmental impact statements, we can expect yet another decade of continuing lawsuits, appeals and protests.

*Ron Sadler of Coos Bay is a retired chief of forestry planning for the Bureau of Land Management. In that capacity, he worked to implement the National Environmental Policy Act and testified as an expert court witness on lawsuits*

*involving those act.*

## **EPA worries new forest management plan and spotted owl recovery strategy could harm Oregon rivers**

**By Susan Palmer**

Published: Wednesday, October 17, 2007 in the Eugene Register-Guard.

Draft plans by the U.S. Fish & Wildlife Service and the U. S. Bureau of Land Management that could increase logging in federal forests in Western Oregon have drawn criticism from the U.S. Environmental Protection Agency, which says the harvesting could harm rivers and imperil fish.

Two letters the EPA sent to the U.S. Fish & Wildlife Service say the proposals could roll back water quality improvements that Oregon watersheds have seen since the implementation of the federal Northwest Forest Plan 13 years ago. That plan set aside large reserves of public forests for the benefit of species at risk of extinction, such as the northern spotted owl, marbled murrelet and salmon.

The U.S. Fish & Wildlife Service is in the process of revising its recovery plan for the northern spotted owl, listed as threatened under the Endangered Species Act. A draft version of the recovery plan, which will be finalized in 2008, already has drawn stinging criticism in several scientific peer reviews for failing to use the best science in narrowing protected areas for the birds. And many Democrats have raised questions about political interference that pushed the plan's authors to emphasize threats to the spotted owl from the barred owl and de-emphasize the importance of old growth forests in the spotted owl's recovery.

The EPA criticism comes from a different angle, arguing that the logging would harm rivers and streams. The EPA is mandated to protect water quality and enforce the federal Clean Water Act.

The BLM has announced it is considering tripling logging on 2.2 million acres of Oregon forests under a new management strategy that would take the agency out from under the umbrella of the Northwest Forest Plan. The BLM has used the draft Fish & Wildlife owl recovery plan to help guide its decisions about where and how to increase logging.

In letters to Fish & Wildlife, sent in August, the EPA raises questions about the wisdom of reducing the late successional reserve network - the areas of old growth forest that spotted owls need to thrive.

In an Aug. 9 letter by Ann Norton Miller, director of the office of federal activities in the EPA's Washington, D.C., office, the EPA questions whether new designations of critical habitat for the spotted owl follow the standards of the

Northwest Forest Plan, and asks Fish & Wildlife to better explain to the public the pros and cons of the options it is considering.

Another letter, sent on Aug. 29 by Michael Gearheard, director of the Office of Water and Watersheds in the EPA's Seattle office, worries that gains under the Northwest Forest Plan could be lost under Fish & Wildlife's proposed spotted owl recovery plan and BLM's proposed logging plan. Already, many Oregon rivers don't meet the water quality standards of the Clean Water Act, Gearheard wrote.

A recent survey of 250 watersheds in the Northwest Forest Plan area found that 57 percent were in better condition from 1998 through 2003 than they had been before the Northwest Forest Plan was implemented, said David Powers, the EPA's regional manager for forests and rangelands. Another 40 percent of the surveyed watersheds were in stable condition and in just 3 percent had conditions worsened, he said.

Several Lane County watersheds were included in that survey, such as the Upper Mc Kenzie, the Coast and Middle forks of the Willamette, Mosby Creek and Hills Creek, Powers said. The most significant improvements were found in areas that had been designated as late successional reserves for spotted owls, he said.

"We are deeply concerned that revisions proposed in the Draft Recovery Plan could delay or even reverse this positive trend," Gearheard wrote in the Aug. 29 letter. "That would be a big step backwards for water quality in Oregon."

The BLM Western Oregon Plan Revision is open for public comment, and the Eugene district plans an open house on Thursday to discuss its technical details in a daylong session.

Fish & Wildlife spokeswoman Joan Jewett said the agency had no specific comment on the EPA letters. During the public comment period on the draft recovery plan, the agency received about 80,000 comments, Jewett said.

"The whole purpose of having a public comment period is to accept comments from citizens, scientists and other agencies, and we will be considering all of those as we put together a final recovery plan," Jewett said.

A spokesman for the BLM said the agency was familiar with the Aug. 29 letter and wants more specific input from the EPA.

The BLM is guided by both the Northwest Forest Plan, which heavily restricts logging, and the federal 1937 O&C Lands Act, which encourages the agency to log to generate revenue. "The BLM doesn't have the luxury of following one set of guidelines," Campbell said. "We have to follow them all. ... While the Northwest Forest Plan has been effective at achieving better water quality

standards and meeting standards under the Clean Water Act, the question is, can we find alternative ways to achieve water quality while meeting the requirements of the O&C Act."

And finally accessible via the Department of Interior's Electronic Library of Internal Policy at: [http://elips.doi.gov/app\\_SO/index.cfm?fuseaction=home](http://elips.doi.gov/app_SO/index.cfm?fuseaction=home)

**United States Department of the Interior**  
**Office of the Secretary**  
Washington, DC 20240

ORDER NO. 3226

SIGNATURE DATE: January 19, 2001

**Subject:** Evaluating Climate Change Impacts in Management Planning

**Sec. 1 Purpose.** There is a consensus in the international community that global climate change is occurring and that it should be addressed in governmental decision making. The National Assessment of the Potential Consequences of Climate Variability and Change, an interagency effort initiated by Congress under the Global Change Research Act of 1990, Public Law 101-606, has confirmed that climate change is impacting natural resources that the Department of the Interior (Department) has the responsibility to manage and protect. This Order ensures that climate change impacts are taken into account in connection with Departmental planning and decision making.

**Sec. 2 Authority.** This Order is issued in accordance with the authorities contained in: Reorganization Plan No. 3 of 1950, as amended, 5 U.S.C. App.; 5 U.S.C. § 301; 43 U.S.C. § 1451; and 43 U.S.C. § 1453.

**Sec. 3 Bureau and Office Responsibilities.** Each bureau and office of the Department will consider and analyze potential climate change impacts when undertaking long-range planning exercises, when setting priorities for scientific research and investigations, when developing multi-year management plans, and/or when making major decisions regarding the potential utilization of resources under the Department's purview. Departmental activities covered by this Order include, but are not limited to, programmatic and long-term environmental reviews undertaken by the Department, management plans and activities developed for public lands, planning and management activities associated with oil, gas and mineral development on public lands, and planning and management activities for water projects and water resources.

**Sec. 4 Effective Date.** This Order is effective immediately and will remain in effect until its provisions are converted to the Departmental Manual or until it is amended, superseded or revoked, whichever comes first.

/s/ Bruce Babbitt

Secretary of the Interior