

MARYLAND ORNITHOLOGICAL SOCIETY, INC.



302 Chelsea Court
Sykesville, Maryland 21784-7717
maureen.harvey@jhuapl.edu

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Bureau of Land Management
Attn: Western Oregon Planning Revision
PO Box 2965
Portland, OR 97208
orwopr@or.blm.gov

Dear Sir or Madam:

The Maryland Ornithological Society (MOS) appreciates the opportunity to submit these comments on the draft Western Oregon Plan Revisions (WOPR), addressing the management of 2.6 million acres of Revested Oregon and California Railroad Grant Lands (O&C lands) administered by the Bureau of Land Management.

Members of MOS have visited the O&C lands, as they contain important habitat for birds and other forms of wildlife. We believe the draft plan would harm the national interest by destroying important old growth forest that is now in protected reserves.

MOS is a statewide nonprofit organization established in 1945 and devoted to the study and conservation of birds. Currently we have 15 chapters and approximately 2,000 members. Some are scientists and naturalists, but our membership includes people of all ages and all walks of life, from physicists to firefighters, legislators to landscapers. Birding is one of the fastest-growing outdoor recreational activities. MOS members travel to federally-owned lands on birding and nature-watching vacations throughout the United States. We spend money on food, lodging, guide services, books and souvenirs to support the local economy wherever we go.

Wildlife Habitat

The O&C lands serve as essential wildlife habitat in association with roadless areas in national forests. Although most of the O&C lands form a checkerboard ownership pattern, there are a number of large blocks. Old growth forests here are of the highest importance, harboring not only the threatened Marbled Murrelet and Northern Spotted Owl, but a diverse population of flora and fauna.

The WOPR draft unwisely focuses on endangered and threatened species that have protection under the Endangered Species Act (ESA). We believe it is essential to maintain viable populations of all native species. The biodiversity of the natural forest is an important natural resource.

We share the view of Oregon wildlife organizations that all the action alternatives in WOPR would jeopardize the survival and recovery of the Marbled Murrelet and Northern Spotted Owl by promoting logging in old growth forests that serve as essential habitat for these species. The logging envisioned in WOPR would also reduce the habitat for many other species that are not now listed under ESA. Some of those may have to be listed in the future as a result of WOPR.

Old Growth Reserves

The Late Successional Reserves and Riparian Reserves designated under the Northwest Forest Plan now protect essential habitat for all species that depend on old growth forest. The NFP, a joint project of BLM and the Forest Service, balances the protection of these reserves against logging in other areas of the O&C lands and national forests.

All three action alternatives in the WOPR draft call for reducing or eliminating both types of reserves. BLM's preferred alternative, Alternative 2, cuts Riparian Reserves by 57 percent, Late Successional Reserves by 47 percent.

The Maryland Ornithological Society opposes any reduction or elimination of Riparian and Late Successional Reserves. The reserves should be retained to protect all native species found in the old growth forest, including those listed under ESA.

Logging could be increased if BLM would follow the Forest Service's lead in concentrating on effective timber production in second-growth forests instead of liquidating the old growth. Forest Service timber sales thinning second-growth stands have been non-controversial.

Wilderness

The O&C lands were mistakenly excluded from the BLM wilderness inventory in 1978-80. The time has come to protect suitable areas as wilderness. Alternative 2 proposes only five units including 13,637 acres, out of 146 areas proposed by Oregon citizens' groups. MOS members visited the proposed Wild Rogue Addition last year and found it well qualified for wilderness designation. We urge BLM to add protection for the Wild Rogue Addition and other candidate areas recommended by Oregon wildlife organizations.

Off-road Vehicles

MOS opposes the blanket designation of 13 "off-highway vehicle emphasis areas" totaling 100,000 acres, as proposed in Alternative 2. Our members drive ORVs for access to remote areas of wildlife habitat, and we depend on BLM and the Forest Service to close routes where our vehicles would harm the habitat. Local opposition in Oregon has pointed to serious impacts ORVs would impose on the 13 areas. If ORV travel is appropriate in any of those areas, BLM should designate specific routes, only after analyzing the site-specific environmental impacts on each route and obtaining public review under NEPA.

Global Warming

The draft plan does not recognize the value of the O&C lands against global warming. It dismisses the issue. We see the intact forest as crucial to effective carbon sequestration. The 2.6 million acres of O&C forest should be part of our national strategy against global warming. This benefit of the intact forest could exceed the value of the timber proposed to be cut.

Economic Values

The draft plan does not adequately reflect the economic values of tourism on the O&C lands. The tourism sector is already an important economic contributor in the O&C counties, and it will become more so in the decades ahead if the lands are not logged off. We believe that watchable wildlife, heritage tourism, and the economic benefits of tourism-related infrastructure development will prove to be more valuable and more sustainable than the proposals in the draft plan to expand logging and roads.

We favor preserving local natural resource-based economies and generations-old traditions. With careful planning and execution, these industries can remain an integral and essential part of evolving tourism-based economic development, and both sectors can flourish.

Thank you for considering these comments.

Sincerely,

Maureen Harvey
Conservation Chair