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**Comment on Draft Environmental Impact Statement  
for the Revision of the Resource management Plans  
of the Western Oregon Bureau of Land Management  
Districts**

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As a recreational user of Bureau of Land Management (BLM) lands, a botanist, and as a purchaser of specialized forest product contracts from the BLM, I urge no action be taken at this time to revise the forest plan. I have several concerns with the effects of the proposed forest plan revisions. The revised plans requiring increased timber harvest do not take into consideration that BLM lands have virtually become islands of functioning diverse forest in a sea of private monoculture tree plantations. All revised plans would involve road closures. Some revised plans would further limit accessibility to areas available for recreational use, including but not limited to dispersed camping, study of flora and fauna, and personal use mushroom collection. Road closures directly impact the areas available for specialized forest product contracts.

The directives in place on O&C land, "include, but are not limited to, managing the O&C lands for permanent forest production by selling, cutting, and removing timber in conformance with the principles of sustained yield; determining the annual productive capacity of the lands managed under the O&C Act; and offering that determined capacity annually under normal market conditions. The statute states that the purpose of sustained yield management of these lands is to provide a permanent source of timber, contribute to the economic stability of local communities and industries, as well as benefit watersheds, regulate stream flows, and provide recreational use. The statutory requirements of the O&C Act are limited by other statutes providing for the need to conserve listed species and the habitat they depend on, not jeopardizing listed species and not adversely modifying critical habitat, and the protection of the chemical, biological and physical properties of the water of the United States. As long as the requirements of these other statutes are met, increasing the level of timber production consistent with the principles of sustained yield would further the objectives set by Congress for managing these lands under the O&C Act."

The directive of "managing the O&C lands for permanent forest production by selling, cutting, and removing timber in conformance with the principles of sustained yield; determining the annual productive capacity of the lands managed under the O&C Act; and offering that determined capacity annually under normal market conditions," appears to be the main point of revising the forest plan. Since the amount of annual timber harvest is less than projected due to several variables, revise the projected timber yields to reflect the current harvest levels. This would ensure a sustained yield at a determined annual productive capacity under the current management plan.

Current market conditions are certainly not normal at this time. The market for softwood is depressed due to increased timber harvesting on lands newly acquired by capital investment firms. Local timber companies formerly managed these lands on 80 to 120 year harvest cycles. The new managers are liquidating the large quantity of standing older trees of greater volume to implement shorter "crop" cycles. The volume of harvest on private timberlands will decrease within five years when the older timber is through the system. Demand for softwoods should increase as the

housing market recovers from the financial problems associated with adjustable rate mortgages.

One of the main purposes of the O&C lands is to, **“contribute to the economic stability of local communities and industries.”** The potential for timber related jobs should not be a consideration in the new plan. The harvest of trees from Federal, State and private forests is having a lesser positive economic impact on local communities each year due to the decrease in forest jobs because of increased mechanization during harvest and transporting the trees outside of the communities, sometimes even out of the country, for processing. There are also fewer processing jobs in the mills. As the level of mechanization increases, the number of mills shrinks as they become more centralized in larger communities.

Take Falls City, Oregon, for example. Although harvests on private timberlands surrounding Falls City are at an all time high on lands currently owned and managed by Weyerhaeuser and Forest Capital Partners, timber jobs are at an all time low in that community. Less people are required to harvest the trees and Weyerhaeuser closed the mill in nearby Dallas, Oregon. An increase in the amount of Federal timber available from BLM lands to private companies will have little, if any, positive economic impact on the communities of Falls City, Oregon and Dallas, Oregon.

The potential for greater private investment income from increasing the amount of timber available from public lands should not be a consideration, as this income is not benefiting the majority of the people in local communities. There are fewer local timber related industries now due to consolidation of the industry than since the O&C land management began.

Payments to counties from O&C lands should also not be considered as a factor to increase logging on BLM lands. The State of Oregon currently does not tax timber private timber companies with over 5000 acres of land holdings. If these counties wish to increase revenue from timber harvests, they should work to pass legislation on the State level to tax the private companies.

One area that is not being addressed in any of these plans is access to BLM lands by the public. Private timber companies are increasing the number of gates on access roads to public lands. At a time when the positive economic impact of increasing recreation on public forestlands should be considered, the amount of public forestlands available for recreation is decreasing. This is restricting the amount of public forestland accessible to the public. This is, in effect, a private “taking” of public property. The tag line on the Forest Capital Partners Google entry says it all, “Provides timberland investment services to the affluent.” There appears to be little concern by anyone at the BLM on the impact of the private timber companies’ actions to the non-affluent 97 percent of the US population.

The potential for increased sales of special forest products should be a consideration in the revision of any plan. When the timber harvest jobs began to decline in smaller

outlying communities in the mid 1980s, many of the local people turned to special forest products to supplement their incomes. Although the lumber mill in Dallas, Oregon has closed, there are still two specialized forest products buyers in the area. While the value to the BLM of the special forest products contracts is less than the value of the timber that is now sold, the impact on the local economy from the collection and sale of special forest products is appreciable. The money derived from harvesting special forest products stays in the local communities and has a ripple effect on local businesses. Exact figures of the economic impact of special forest product collection are not readily available. Collection of fir boughs in Oregon and Washington in 1989 was about \$6.7 million dollars and employed about 5,000 collectors and 4,000 persons processing the boughs. In 1990, mushroom collectors were paid \$1,278,910 for mushrooms collected and sold in Washington.

Unfortunately the policies of the private timber companies limiting public access to BLM land, has resulted in fewer special forest product contract sales on BLM land and decreased revenue for special forest product collectors. This practice has personally cost me at least ten thousand of dollars over the past several years by restricting access to certain areas on BLM lands that I have identified as viable harvest areas for specialized forest products. I used to pay the BLM for permits to collect these special forest products but the areas are no longer accessible to the public. Some of these areas are unique in that they support concentrations of commercially viable populations of fungi that fruit at times not normally considered as being "in season" for that particular species so the payment for collection in these areas is at a premium. I hesitate to list these particular areas here as they have required much time and expense to locate and I do not wish the locations to be on the public record more than they already are.

There are alternatives to increasing logging activities that would, **"contribute to the economic stability of local communities and industries, ... and provide recreational use."** The demand for recreational use on public lands is increasing. One great use of public land is due to the joint efforts of the Black Rock Mountain Biking Association and the Oregon Department of Forestry. Mountain bike trails are being developed on some of the ODF lands (adjacent to BLM lands) outside of Falls City, Oregon. This has resulted in a positive economic effect to the local economy of Falls City. It appears that the Falls City Market is getting more business from mountain bikers than from the people that pass through town to work harvesting timber. While there are no more mills in Falls City, there is a new bicycle shop and a new deli.

One bicyclist told me this summer, "You think that there are a lot of people using the Black Rock trails now, just wait 'til next year!"

The Molalla River Recreation Corridor is one of the BLM's great successes. This area was formerly a dumping ground for trash and home to various illegal activities. Now, the Molalla River Watch group and forest friendly users lessen the impact of illegal

activities due to increased numbers of forest visitors. The recreational use of this area is increasing, as is the favorable financial impact on the local businesses.

While increased road closures and creation of designated travel areas under the proposed forest plan alternatives would facilitate the ease with which law enforcement is able to control the actions of those few individuals that would engage on illegal activities on public lands, these same road closures would not enhance the experience of most forest users. The decreased accessibility would result in fewer acres of forest available for use without having to trek long distances on foot. While the casual visitor to the forest may not notice a difference, the dedicated forest users will suffer from a loss of ability to enjoy a dispersed recreational experience. The road closures will also adversely affect persons engaged in commercial special forest products contract activities. The time spent accessing collection areas on foot equates to a smaller check at the end of the week.

**“The statutory requirements of the O&C Act are limited by other statutes providing for the need to conserve listed species and the habitat they depend on, not jeopardizing listed species and not adversely modifying critical habitat, and the protection of the chemical, biological and physical properties of the water of the United States.”** Shortening stand rotation age within the timber management area to more closely emulate industrial forest practices should not be an option. Since most private timberlands are now being harvested on 35 year cycles (Weyerhaeuser and Longview Fiber) and 50 year cycles (Forest Capital Partners), it is imperative that public lands be managed in such a way as to ensure survival of diverse species, especially those that do not normally enter or flourish in stands of timber until after the stand is over 35 or 50 years of age. In just a few “harvest cycles”, many of the perennial wood decomposing fungi, such as *Fomitopsis pinicola*, *Ganoderma applanatum*, etc. will probably be mostly absent from private timberlands. Many saprophytic fungi contain turpenoid compounds and polysaccharide compounds that are unique to the species. The importance of these organisms is just now being realized in Western Medicine. Public lands will essentially be the only islands of species diversity in a sea of young monoculture tree plantations. I assert that these tree plantations will no longer be healthy forests, as they will not support a diversity of forest organisms. To get an idea of the impact of private timber harvest practices on the forest, one merely needs to look at a map of BLM properties and realize that anything not managed by government agencies will no longer be functioning forest. A quick look at the watersheds within the area managed by the Salem BLM on Google Maps will generate a much better picture. There are few stands of trees over 60 years of age right now in the Luckiamute, Little Luckiamute, Silver Creek, Abiqua Creek, Butte Creek, Baker Creek, Deer Creek, Willamina Creek, and lower Santiam River watersheds except on lands managed by the BLM.

Any forest management plan should address the following concerns with current forest management practices:

1. Special consideration should be given to protect populations of organisms that have developed unique genotypes and phenotypes where isolated from larger populations of the organisms. One example is the development of different physical characteristics in disparate populations of *Abies nobilis*. An experienced Christmas tree farmer is able to visibly distinguish between trees grown from seed collected on Fanno Ridge (probably the number one seed source choice for *Abies nobilis* among Oregon Christmas tree growers) and trees grown from seed collected on Mary's Peak. The trees have a different growth form and growth rate.
2. Replanting harvested areas needs to be completed within 90 days of clear cutting to promote retention and diversity of ectomycorrhizal fungi. While some ectomycorrhizal fungi persist on the roots of ericaceous shrubs past the ninety-day mark, many ectomycorrhizal fungi are host-specific and may not be symbiotic with certain plants that are retained in the harvested areas. Retention of ectomycorrhizal diversity existing in the stands should be enhanced with shortened periods between harvest and replanting of the trees. A diverse population of ectomycorrhizal fungi is necessary, if for no other reason than to ensure a healthy forest nutrient cycling system.
3. Ground disturbance during management activities should be minimized to lessen the impact on forest soils due to compaction. Most healthy forest soils are about 80 percent air by volume. I assert that soils heavily compacted by management activities take longer to recover and return to nutrient cycling than those areas not compacted. While the evidence of this may be subjective, I am certain that further study in this area will bear out my observations. I have observed that certain contractors are better than others at lessening disturbance during stand thinning. Some contractors compact the soil to the point that it takes several years for ectomycorrhizal fungi to begin to fruit in the stands after disturbance. Other contractors cause less soil compaction during management activities. This is evidenced by no interruption in fruiting cycles of ectomycorrhizal fungi except where the ground is directly disturbed by tree removal. These latter contractors should be given priority in future contracts.
4. The current number of standing trees left after thinning should be increased slightly to provide more shade for the forest floor, especially in areas of concentrated ectomycorrhizal fungi with commercial and recreational value. Fewer canopy gaps should help to decrease the number of noxious weeds that invade the stands after management disturbance and discourage excessive growth of shade intolerant plants, such as *Gaultheria shallon*. This will also help to ensure the continued diversity of less aggressive plants as well as ectomycorrhizal fungi that are intolerant of UV light.
5. Since current survey practices for special status species are based on the "intuitively controlled, random transect" method, additional time should be spent more fully inspecting units with known populations of special status species before any disturbance is allowed to take place.

6. **Special status species should not be exempted from treatment as such on a unit-by-unit basis as was done with *Ramalina thrausta* near Dorena Lake (Eugene BLM district) without further study. Perhaps areas where this has already occurred should be intensively studied to determine the effects on the special status species of thinning in these areas. There may be a benefit to some special status lichen species due to the edge effect.**
7. **Stream buffers should be increased from the current requirements to promote survival of sensitive species.**
  - a. **For example, little is known on the effects of increased turbidity, increased UV radiation and increased stream temperatures on endangered/threatened/sensitive organisms such as *Fissidens grandifrons*. Until further study is pursued, the impact from management disturbance in the areas surrounding these organisms should be minimized.**
  - b. **Care should also be exercised in maintaining levels of marine derived nutrients in these streams.**
  - c. **Increased stream buffers would also increase the chances of survival of endangered/threatened/sensitive epiphytic lichens and bryophytes, such as *Pseudocyphellaria perpetua*, that grow on streamside hardwoods (Lake Creek, Eugene BLM District). Removal of streamside hardwoods, such as *Holodiscus discolor*, *Physocarpus capitatus*, *Prunus* spp., etc. should be minimized to encourage opportunities for growth of the various epiphytic lichens and bryophytes.**
  - d. **Stream banks already benefit from the edge effect that allows for increased diversity of various flora, so increasing the available light by thinning or removing adjacent trees should not be a priority in stand management.**

**The directives of providing a “permanent source of timber, contribute to the economic stability of local communities and industries, as well as benefit watersheds, regulate stream flows, and provide recreational use,” can be met under the current forest plan. I would again urge no action be taken on revising the current forest plan at this time.**