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Re: Western Oregon Plan Revisions Draft Environmental Impact Statement

Thank you for considering these comments from Umpqua Wild on the Western Oregon Plan Revisions (WOPR) Draft Environmental Impact Statement (DEIS). We have emailed these comments electronically, as well as submitted a hard-copy. Our organization is concerned with protecting the environment in the Coos, Coquille and Umpqua River Basins, and thus these comments focus on impacts to the Roseburg and Coos Bay BLM districts.

In general, all alternatives of the WOPR fail to protect old growth forests and associated public resources, including wildlife, drinking water, salmon streams, recreation, and the economic value of leaving public forests uncut. The BLM lands are in a checkerboard pattern in and around homes and communities. Unlike National Forest land, the public forests of BLM effect people's everyday lives in a more direct way. The WOPR DEIS failed to consider impacts to these important human values. Additionally, please consider the following comments:

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1. Coquille Forest and the Tribal Cooperative Management Area

The WOPR DEIS calls the 15,000 acres of Coos Bay BLM lands surrounding the 5,400 acre Coquille Tribal forest the "Tribal Cooperative Management Area" (TCMA). By designating a separate land allocation for lands near the Coquille Forest, the BLM is attempting to circumvent the congressional intent to protect public resources.

In the TCMA, stream buffers are reduced by 50%, down from a 100' buffer on fish-bearing streams in alternative 2, to only a 50' buffer. Also, there is no Debris-Flow stream buffer category in TCMA's, so the intermittent streams on these 15,000 acres will never deliver wood downstream.

If implemented, the TCMA is the only area of BLM lands in western Oregon that would result in increases in stream temperature, up to 1°F per mile¹. This is a violation of the clean water act. Besides warming temperatures, the streams in the TCMA will be devoid of large wood. Neither of these issues were adequately considered in the DEIS.

Currently, the Coquille Tribe management of the 5,400 acre Coquille Forest has been restrained by the congressional act that granted them these Coos Bay BLM lands in 1996. P.L. 104-208 says the BIA "shall manage the Coquille Forest... subject to the standards and guidelines of Federal forest plans on adjacent or nearby Federal lands, now and in the future". So far, that has been the Northwest Forest Plan. In the future, it should be whatever plan revision the BLM chooses on BLM lands – there should be no extra land allocation, with weaker resource protections, just for the purpose of allowing the Coquille Tribe to log more.

The only reason the BLM has included the TCMA land allocation is to circumvent the intent of the congressional act. Instead of the Tribe managing under the environmental protections of adjoining federal lands, the BLM wants to allow the Tribe to manage under their less restrictive environmental goals, and allow the BLM to also manage under the weaker stream protections.

At the WOPR workshop in Coos Bay, a question was asked of the Tribal representative Jason Robinson: "Why does the Tribe want only half the size of stream buffers as the BLM is proposing?" Jason answered that that is the minimum buffer the Tribe thought was necessary. There was so scientific basis offered for this reduction neither at that meeting, nor in the DEIS. It is simply for the purpose to allow more intensive logging.

Because of the TCMA, there will be over 20,400 acres managed under weaker protections, including the federal lands, and the Coquille Forest. The DEIS only considered the federal land weakened protection impacts to the environment, not the additional Coquille Forest lands. Instead, NEPA requires a cumulative effects analysis.

At the Coos Bay Workshop, I also asked the Tribal Representative, Jason Robinson, what other opportunities would occur for the Tribe in the BLM's 15,000 acre TCMA. The

¹ WOPR DEIS page 743.

“agreement to collaborate and coordinate management on the BLM lands that are adjacent to the Coquille Forest”² was never spelled out to the public in the DEIS, but the Coquille Tribe has specific expectations. Jason said that the Tribe would help the BLM plan timber sales. Indeed, the Tribe’s brochure says:

TCMA concept allows the Tribe and the BLM to manage lands in a cooperative management setting using the following goals as guidance.

- * Manage the [Coquille] Forest and the TCMA as an ecological unit across jurisdictional boundaries....
- * Manage for sustainable timber production and economics while adhering to the guidelines of the O&C Act of 1937....
- * Cooperatively manage the TCMA with consistent policies and standards for resource management.”

In concerns us that the Tribe and the BLM will together managed BLM lands with potentially weaker public input and environmentally weaker Tribal goals for forest management. The BLM should have disclosed the consequences for public involvement in the TCMA, and how it differs from the rest of the BLM lands.

The FEIS should eliminate the TCMA. In any case, the BLM should correct the environmental consequences to include the total land acres managed under the TCMA.

2. Reduction of ACECs is illegal.

The WOPR illegally eliminates ACECs in the Coos Bay and Roseburg BLM. The excuse that all O&C lands, even those that are of critical environmental concern, must be logged, is not valid. FLMPA requires ACECs where appropriate. The O&C Act itself allows for multiple uses on O&C lands, in spite of BLM’s interpretation.

Wasson Creek:

In Coos Bay BLM, Wasson Creek was identified containing wilderness characteristics of naturalness, outstanding opportunities for solitude and outstanding opportunities for primitive, unconfined recreation³. In fact, at 25,000 acres, Wasson Creek roadless area is the largest roadless area in the entire Umpqua River basin, managed by the Siuslaw National Forest and the Coos Bay BLM. The 3,408 acres managed by the Coos Bay BLM is an integral part of the entire wilderness.

In 2006 the BLM did an evaluation of wilderness characteristics on Wasson Creek. The BLM says⁴:

The Wasson Creek unit provides an outstanding opportunity for dispersed and undeveloped recreation such as hiking, native cutthroat fishing, big game hunting,

² WOPR DEIS page 20.

³ WOPR DEIS page 418.

⁴ Wasson Creek Wilderness Characteristics Evaluation Form. Dave Wash. Outdoor Recreation Planner. Coos Bay BLM. 6-9-06.

backpacking, and exploring large stands of old-growth Coast Range forest. Wasson Creek flows from this unit into the Siuslaw National Forest, where the creek cascades over the Devil's Staircase, a rarely visited set of waterfalls. The BLM and Forest Service have long planned on constructing a hiking trail through these units to provide access to this natural feature.

In 1979, the BLM's Wilderness Inventory reported that the "imprint of man's work is substantially unnoticeable within the withdrawal areas". The images generated using 2005 National Agricultural Imagery Project (NAIP) satellite imagery shows this still to be the case, especially within the larger northern unit encompassing the upper reaches of Wasson Creek. The entire unit is primarily comprised of a large multistoried conifer forest. Over 1,187 acres of this unit have been withdrawn from commercial forest production and the entire proposal area is overlaid by critical habitat units for the northern spotted owl and the marbled murrelet. A large part of the proposed unit contains the 3,440 acre Wasson Creek ACEC.

Most of the terrain within the proposal unit appears to have been affected primarily by the forces of nature and the imprints of human activity are substantially unnoticeable.

The unit's dense vegetation, diverse topography, and steep walled mountain valleys provide natural screening from the sites and sounds of other people. In addition, the sections at the western end of the unit are adjacent to a very large tract of roadless area within the Siuslaw National Forest that further enhances the sense of remoteness and solitude offered within the unit. These factors all contribute to providing an outstanding opportunity for solitude within the Wasson Creek unit.

Moving these acres out of an Area of Critical Environmental Concern, and into mostly a Timber Management Area, is illegal without a cumulative effect analysis. Incredibly, the DEIS says nothing about the entire 25,000 acre wilderness area, and how BLM's action would effect it.

The DEIS is misleading the public on the BLM's proposed treatment of Wasson Creek. On one hand, the DEIS claims that "special management to maintain wilderness characteristics" would be applied to Wasson Creek.⁵ But later the BLM admits "the special management to maintain wilderness characteristics would not apply to portions of these units that occur on O&C lands suitable for permanent timber production.... It is assumed that these portions would eventually be regeneration harvested... Regeneration timber harvest would result in a loss of wilderness characteristics."⁶ Table 220 shows that up to 2,154 of the 3,408 of Wasson Creek wilderness characteristics acres, or 63%, could be converted to the "harvest land base" available for clearcutting.

⁵ WOPR DEIS page 784

⁶ WOPR DEIS page 787.

Umpqua River Wildlife ACEC: On the Roseburg BLM district, the DEIS is proposing to eliminate the Umpqua River Wildlife ACEC of 947 acres⁷! This ACEC includes Brads Creek, Golden Bar, Cougar Creek, Lost Creek, Marin Creek, and Woodruff Mountain. This is an incredible loss, not only for wildlife, but also for boaters on the main stem Umpqua River who use these areas camping and picnicking. These are special places for boaters because overland access is difficult. Boaters appreciate the beauty and privacy of these areas and come from all over the state to recreate here. Groups of boy scouts, collage students from Portland, and local fisherman can regularly be seen recreating in the Umpqua River Wildlife ACEC. Clearcutting down to the riparian buffer will ruin the recreation experience, not to mention the wildlife habitat. The DEIS failed to mention any impacts to recreation or wildlife from eliminating this ACEC. Wildlife includes osprey and bald eagle nests. We understand there will be buffers left for nest trees, but clearcutting the rest of the area is shameful. These areas were put in ACECs for a good reason. Even if some of the Umpqua River Wildlife ACEC is put into administratively withdrawn areas, that is a weak protection and can easily be retracted.

Eliminating these ACECs and wilderness areas is illegal without cumulative effects considerations and especially without being clear in text or maps what is being converted to a Timber Management Area.

Likewise, the failure of the BLM to recognize areas that were nominated as ACECs in the course of the WOPR planning process does not meet the requirements of FLPMA. Several of the nominated ACECs met the criteria, but the BLM arbitrarily denied protection for these potential ACECs and never analyzed these areas in the DEIS. At the least, the BLM should have provided the public a list of nominated ACECs, indicated which nominated area met the ACEC criteria, and which were ultimately denied consideration.

3. OHV use in Roseburg BLM district

The DEIS inappropriately allows for additional Off Highway Vehicle (OHV) infrastructure in the Roseburg district without considering the cumulative environmental impacts of increasing OHV use. One new staging area and two new OHV trailheads⁸ on the Roseburg district will encourage and allow more legal, and illegal OHV use.

The DEIS failed to disclose the general location of the new OHV infrastructure. Map 22 on page 171 puts numbers where these staging areas and trailheads are, but the map is so small, each number covers about 2 square miles.

When I asked, the BLM told me the new staging area was at the top of Callahan Ridge. This is exactly where years of illegal trail-building and OHV riding has been occurring, with virtually no BLM oversight. We have consistently informed the BLM about the

⁷ 947 acres comes from the Roseburg BLM page 89. For an unexplained reason, the DEIS calls the Umpqua River Wildlife Area ACEC only 855 acres.

⁸ WOPR DEIS page 130.

illegal activities⁹, but BLM has failed to correct the situation. At one point, we were told the BLM could not correct the situation because they could not afford enough law enforcement personnel. Not only did the DEIS fail to consider the impacts of additional OHV use, it also failed to consider the impacts of additional *illegal* OHV use. If the BLM cannot control the current OHV use, more use will mean not only more legal resource damage, but also more illegal resource damage.

The DEIS also failed to define an OHV "staging area" and OHV "trail head". Informally, the BLM told me a trail head is smaller, but still includes "parking, a restroom and bulletin board"¹⁰.

The DEIS analysis on new infrastructure included numbers on a map (page 171), which means BLM has decided on specific locations for the new OHV staging areas and trail heads, eliminating a reasonable range of alternatives. This violates NEPA, which requires more analysis and consideration of reasonable alternatives. The DEIS failed to give the public the opportunity to meaningfully comment on the one alternative BLM has in mind, much less other alternatives. Once these numbers are embedded in a ROD, this stage of the analysis is over, and the BLM has the authority to proceed to further define and implement the expanded OHV infrastructure.

The new OHV staging areas and trailheads will facilitate OHV recreation over thousands of acres. Motorized recreation has a much greater impact to natural resources than any other recreation on BLM lands. The DEIS failed to properly consider this *lop-sided*, damaging recreation emphasis.

The Hubbard Creek OHV emphasis area is being increased 360 acres, from 11,681¹¹ acres to 12,041 acres¹² without disclosure or consideration of impacts in the DEIS. In fact, the DEIS claims the Hubbard Creek OHV Emphasis Area under no-action alternative is 12,041 acres while the current RMP shows Hubbard Creek at 11,681 acres. The BLM cannot increase the emphasis area by 360 acres under the current RMP without NEPA analysis.

Non-motorized Recreation in Roseburg BLM District: Page 120 of the DEIS tells us that the Umpqua Special Recreation Management Area is being reduced from 2,240 acres under the current plan, down to only 457 acres under all action alternatives. The map of this on page 167 is useless in telling us what areas are being dropped, but this appears to be a terrible loss for recreation. We asked the Roseburg BLM¹³ to describe what recreation acres we are losing, but even they were unable to do so. NEPA requires disclosure of these facts, and analysis of impacts. Neither was done for the Umpqua SRMA.

⁹ Some of our correspondence with the BLM on illegal activity on Callahan ridge includes letters on 11-28-00, 8-24-01 and 3-12-07

¹⁰ Email from Robert Hall, Roseburg BLM, 8-28-07.

¹¹ Roseburg BLM RMP. 1995. Page 58.

¹² WOPR DEIS page 143.

¹³ Email to Robert Hall, September 20, 2007

Table 51, page 137, shows that Roseburg BLM is the only district with NO environmental education areas. Why is this? People in the Roseburg area live in the checkerboard, all around the BLM lands. Considering this high population living in the checkerboard, the DEIS failed to explain why are there no education areas. Coos Bay district, with a lower citizen population, and few public acres, has 2,562 acres for environmental education. Roseburg BLM has equal opportunities, but apparently not equal will.

4. OHV and other recreation in Coos Bay District

A new OHV emphasis area is proposed for Coos Bay BLM, 34,013 acres, known as "Tioga".¹⁴ While this is listed as a "Special Recreation Management Area" on page 121, we are concerned the main recreation being planned is to allow more OHV play areas. Other recreation opportunities described, hunting, fishing, camping, etc, occurs across all BLM lands. The Activity Planning Framework describes maintaining existing trails, but in the entire area, there is only one tiny trail, the .05-mile trail to the Dornier Fir. Another activity described is "evaluate the conversion of closed roads for ... ohh highway vehicle opportunities." That is a misprint. The DEIS meant that the closed roads will be evaluated for off highway vehicle opportunities.

A 34,013 area for OHVs equates to a large new OHV emphasis area. The DEIS failed to consider the environmental and resource damage caused by OHV users, including illegal use. The BLM is unable to enforce legal OHV use now, so encouraging more OHV use will also expand illegal use, such as illegal new trail building, off trail riding, stream crossing abuse, etc.

This area is designated a Late-Successional Management Area under alternative 2 and a LSR under the no-action alternative. A new OHV emphasis area in this area is not compatible with other designated land uses.

5. Effects to HCP's from reducing or eliminating LSRs

The BLM failed consider the impacts to Habitat Conservation Plans (HCPs) on private and state lands from reducing reserves on federal lands in all action alternatives of the DEIS. In Oregon, two current HCPs depend on LSRs, the 1995 Weyerhaeuser's Millicoma Tree Farm HCP covering 209,000 acres west of Roseburg, and the 1995 Elliott State Forest HCP covering 93,282 acres between Reedsport and Coos Bay. Both these HCPs currently cover only the Northern Spotted Owl. A third HCP is the 2005 draft HCP for the Elliott state forest that will replace their 1995 spotted owl HCP and add marbled murrelets. Below are excerpts from these three current and proposed HCPs that depend on near-by BLM LSRs that the WOPR DEIS is proposing to convert to Timber Management Areas.

¹⁴ WOPR DEIS page 121

Elliott State Forest 1995 HCP

In the Elliott State Forest's 1995, 60-year HCP for northern spotted owls, the United States Fish and Wildlife assumed:

"Large amounts of the federal lands near the Elliott are designated as late successional reserves. These reserves will be managed to protect and enhance habitat for late successional and old growth-related species, including the spotted owl. Limited stand management will be permitted, to maintain and protect late successional forest ecosystems."¹⁵

"Late successional reserves would protect habitat for species dependent on these forests, including spotted owls and marbled murrelets. Some silvicultural and salvage activities would be allowed in parts of these reserves, to assist in the development and maintenance of old growth characteristics."¹⁶

The BLM failed consider how a change in the level of reserve protections will affect these assumptions in the Elliott's 1995 HCP. Alternative 2 and 3 remove the LSRs to the northeast and south of the Elliott, and convert them to Timber Management Areas. If the HCP assumptions are not longer true, the WOPR EIS must consider the impacts to the HCP.

LSR RO265 is especially important to the Elliott HCP:

"The Elliott State Forest and Late Successional Reserve RO265, immediately north of the Elliott, provide a critical link within the Oregon Coast Range Province, connecting populations north and south of State Highway 38. ... Regrowth of forests in Coast Range LSRs, and hence, demographic contribution, will not begin to occur for several decades. In the meantime, contributions to the provincial owl population by the Elliott will be very beneficial. Populations within the Klamath and West Cascades Provinces are more stable, and restocking of coastal LSRs will be enhanced by immigration from these. It is especially important to maintain dispersal linkages, such as the Elliott, between LSRs and potential source populations in the Klamath and West Cascades and other areas of the Coast Range Province to allow restocking of reserves."¹⁷

The BLM failed to not only consider the importance of the LSRs to the Elliott State Forest HCP, but also the importance of LSR RO265 to the entire Coast Range Province, as detailed above. LSR 0265 consists of Coos Bay BLM lands (as well as some Siuslaw National Forest lands).

The Elliott HCP also says:

Effective 1995, Weyerhaeuser Corporation has entered into an HCP with the USFWS to manage its 209,000 acre Millicoma Tree Farm, adjacent to the Elliott, as habitat conducive for dispersal of spotted owls. ... The Millicoma Tree Farm and the Elliott State Forest form the major linkage between three LSRs that will be critical in

¹⁵ Elliott State Forest HCP. 1995. Page I-4.

¹⁶ Elliott State Forest HCP. 1995. Page I-25.

¹⁷ Elliott State Forest HCP. 1995. Page IV-2 and IV-3.

facilitating intra- and inter-provincial movement, and restocking of suitable, potentially vacant, habitat that will be developing in the LSRs.”¹⁸

All three of those LSRs include BLM lands, and all three are being converted to Timber Management Areas under the preferred alternative. The BLM failed to consider what will happen to this major linkage if the LSRs are eliminated and reduced, as well as consider that the Elliott and Weyerhaeuser Millicoma Tree Farm will both have to re-negotiate their HCPs to take more of the burden for protecting murrelets and owls.

The Elliott’s HCP dependence on the surrounding BLM LSRs is immense. The HCP allowed an incidental take permit of 43 owls, allowing the Elliott to clearcut over 500 acres of owl nesting habitat a year, because:

“The Elliott State Forest will provide... habitat that allows spotted owls and marbled murrelets to move from lesser quality habitat on private lands to higher quality habitat on federal lands.”¹⁹

If those LSRs are removed, the Elliott’s HCP will have to be renegotiated.

Weyerhaeuser Millicoma Tree Farm 1995 HCP:

The 1995 Weyerhaeuser Millicoma Tree Farm Habitat Conservation Plan enumerates the three federal “Designated Conservation Areas” (DCA)s in the vicinity of the 209,000 acre Millicoma Tree Farm, and notes they had been recently renamed Late Successional Reserves. They include both Roseburg and Coos Bay District LSRs.

The Millicoma HCP is based on the 4th recommendation of the Final Draft Recovery Plan (1992) for the NSO, which recommends maintenance of habitat conditions conducive to the dispersal of juvenile spotted owls between the DCA (now LSRs). “This is the basis for the Millicoma HCP.”²⁰ The USFWS assumed that “Much of the BLM ownership to the northeast, east, and south of the tree farm will be managed as reserves to benefit the spotted owl and other late-successional forest species.”²¹

Under the WOPR DEIS, all of the BLM ownership to the south of the tree farm, is losing their LSR protections, completely skewing the Millicoma HCP assumptions. If those LSRs are removed, as proposed the DEIS, the Weyerhaeuser Millicoma Tree Farm HCP will have to be renegotiated. The DEIS should have disclosed this and considered the HCPs in cumulative effects.

The USFWS estimated that the “projected future capacity of the three DCAs [LSRs near the Millicoma Tree Farm] ranges from 15 to 17 pairs of potentially reproductive spotted owls.... therefore below optimum in size. The maximum recommended distance between DCAs of fewer than 20 pairs is 7 miles to allow for adequate dispersal of juvenile owls from one DCA to the other. The two DCAs lying on either side of the Millicoma Tree Farm are separated by approximately 12 miles, suggesting that dispersal could become a

¹⁸ Elliott State Forest 1995 HCP. Pages IV-2 and IV-3

¹⁹ Elliott State Forest 1995 HCP. Page IV-3

²⁰ Habitat Conservation Plan for the Northern Spotted Owl. Millicoma Tree Farm. 02-1995. Pg 2-6.

²¹ HCP Millicoma Tree Farm. 2-95. Page 4-4.

limiting factor in the future maintenance of owls in the DCAs.”²² “ The size and spacing of the DCAs leaves them at increased risk of local extinction unless adequate dispersal occurs... Dispersal habitat will exist between these two DCAs only if provided by Weyerhaeuser.”²³

Elliott 2005 Draft HCP:

Another HCP to consider is the draft of the Elliott’s proposed HCP, meant to replace the current HCP in 2008. In the new HCP, the Oregon Department of Forestry (ODF) depends on federal lands to protect the owl even more than the current HCP.

“Large amounts of the federal lands near the Elliott State Forest lands are designated as late successional reserves. These reserves will be managed to protect and enhance habitat for late successional and old growth-related species, including the spotted owl.”²⁴

This HCP will establish Conservation Areas to “Provide stepping stones of advanced structure between late-successional reserves on adjacent federal forest lands.”²⁵

The ODF says that, for Late Successional Reserves:

“...the management emphasis is for “restoration and maintenance of late-successional forest habitat” (USDA Forest Service et al. 1994a). These commitments are currently being implemented by the Federal Northwest Forest Plan adopted in 1994, which defines the Federal land contribution to northern spotted owl recovery.”²⁶

ODF assumes:

“The specific contributions necessary from any given nonfederal landscape will vary depending on many factors, especially the distribution and condition of federal lands in the area. In general, these contributions to recovery will ...

- Provide habitat near or adjacent to late successional reserves ... that are, in themselves, not wholly capable of supporting a population cluster large enough to remain viable due to isolation, small size, or limited habitat conditions.
- Provide habitat sufficient to accommodate movement and interaction of owls across landscapes that separate individual habitat reserves or population clusters. Overall, the contribution to recovery by non-federal lands will be to enhance the viability of the local or regional owl population beyond that which is possible solely through federal land conditions.”²⁷

The 2005 Elliott HCP assumes: “Adjacent federal lands are being managed to provide future habitat in late successional reserves.”²⁸ It also assumes:

“A network of late successional reserves creates the foundation of the federal conservation strategy (USDA Forest Service et al. 1994a). These reserves and other

²² HCP Millicoma Tree Farm. 2-95. Page 4-18.

²³ HCP Millicoma Tree Farm. Page 4-19.

²⁴ ODF proposed HCP for ESF. 2005 page 3-5.

²⁵ ODF proposed HCP for ESF. 2005 page 5-9

²⁶ ODF proposed HCP for ESF. 2005 page 6-3

²⁷ ODF proposed HCP for ESF. 2005 page 6-3

²⁸ ODF proposed HCP for ESF. 2005 page 6-4

designated areas (e.g., Congressionally withdrawn lands) encompass approximately 89 percent of the estimated marbled murrelet habitat on lands managed by the U.S. Forest Service and Bureau of Land Management. Suitable habitat within these designated areas will be protected, and stands that are not currently suitable will be protected or managed to develop characteristics that support nesting marbled murrelets.²⁹

If the BLM removes the LSRs in the vicinity of the Elliott State Forest and the Millicoma Tree Farm, adjoining Coos Bay and Roseburg BLM LSRs in the southern Oregon Coast Range, as proposed in the WOPR DEIS, these Habit Conservation Plans will need to be renegotiated. The DEIS should have disclosed and considered this impact to private and state lands.

Scientists developing the Millicoma HCP (next to Roseburg and Coos Bay BLM LSRs) found:

“As of 1992... roughly half of the known owls (47%) were found south of State Highway 38 in the Southern one-quarter of the [Oregon Coast Range] province... The higher density of owls in the southern portion of the province was attributed to the greater amount of federal land with suitable spotted owl habitat south of Highway 38.”³⁰ The Recovery Team considered the most severe threats in the Coast Range province to be low and declining populations; little nesting, roosting, and foraging habitat; poor distribution of the remaining owls and habitat, isolation of the province from other populations of spotted owls, and high levels of predators.³¹

Nothing has improved since 1992. Weyerhaeuser has cut some of their old-growth under the HCP, and the latest Owl Survey on the Elliott (2003) found barred owls moving in. Removing the LSRs these HCPs relied on could have dramatic effects in the functioning of the HCPs. The BLM must add this impact to the WOPR FEIS.

6. ASQ is 32% higher under no-action alternative (or, no-action does not comport with NEPA's requirements for no-action)

According to the DEIS, the WOPR no-action alternative is not the current Resource Management Plans (RMPs) being implemented. Instead, the ASQ is 32% higher under the so-called no-action alternative than under current RMPs.

[T]he allowable sale quantity for the No Action Alternative would be 268 mmbf per year, which would be 32% greater than the 203 mmbf per year that was declared as the allowable sale quantity in the 1995 resource management plans³².

The BLM would never have been able to increase the current ASQ of individual districts without consideration under NEPA. In fact, the 3rd year evaluations already considered if

²⁹ ODF proposed HCP. 2005 page 7-3

³⁰ Millicoma HCP. 2-95. 4-16.

³¹ Millicoma HCP. 2-95. 4-16.

³² DEIS for the Revision of the RMPs of the Western Oregon BLM Districts. Page 566.

the ASQ needed to be changed, and in 2001, the BLM decided they did not. It is a now violation of NEPA to call an increase in ASQ a "no-action" alternative.

An example of the increase of the ASQ is on page 560, which shows the Roseburg BLM no-action alternative ASQ at 56 mmbf per year, when the current RMP is 45 mmbf³³. Coos Bay no-action ASQ is 48 mmbf, when it is currently 32 mmbf. The reason given on page 566 for the increase in no-action ASQ is that there are less Riparian Reserves then thought in 1995, there is new inventory data, and revised growth and yield information.

An increase in ASQ by 32% means an increase in road building, yarding disturbances, broadcast burning, hauling next near streams, sediment delivery to streams, and an increase by 32% of every other disturbance that logging causes. The ASQ is not just a number that has no effect if it is changed. An increase in all logging disturbances by 32% must have a NEPA analysis. Considering it as a no-action alternative, without comparing it to a real no-action alternative, violates NEPA.³⁴

Individual BLM districts RMPs require NEPA before increasing the ASQ by 32%. For instance, Roseburg BLM RMP says: "The actual sustainable timber sale level attributable to the land use allocations and management direction of the resource management plan may deviate by as much as 20 percent"³⁵, not by 32%. A Plan Amendment would be needed, which requires it's own EA or EIS.

"An amendment shall be made through an environmental assessment of the proposed change, or an environmental impact statement.... In all cases, the effect of the amendment on the plan shall be evaluated"³⁶

The BLMs "Land Use Planning Handbook" is also clear the BLM cannot have a no-action alternative that increases logging by 32% from the current condition: "a. The BLM must consider all reasonable alternatives, including the no action alternative (the continuation of present levels or systems of resource use)."³⁷ FLPMA reinforces this by saying: "One alternative shall be for no action, which means continuation of present level or systems of resource use."³⁸ The BLM must comply with the Federal Land Policy and Management Act (FLPMA).

The BLM NEPA handbook also defines no-action: "... the no-action alternative generally means that the proposed activity will not take place."³⁹ Does the BLM think that if the proposed activity does not take place, all BLM ASQ's will suddenly increase by 32%?

³³ Roseburg BLM RMP. 1995. page 60: "Declare an annual allowable sale quantity of 7.0 million cubic feet (45 million board feet)."

³⁴ 43 CFR 1508.25 Scope... "agencies shall consider... (b) Alternatives, which include: (1) No action alternative..."

³⁵ Roseburg BLM RMP. 1995. page 61.

³⁶ 43 CFR 1610.5.5

³⁷ BLM Manual. 3/11/05. Page 20

³⁸ 43 CFR 1610.4-5

³⁹ BLM NEPA handbook IV-4.

The BLM NEPA handbook says: "The no-action alternative should describe what would occur if the proposed action or other alternatives were not implemented. In some cases, no action would be defined as no change from current management direction or level of intensity, not a freezing of the existing situation. In other cases, such as for project proposals, no action would mean not allowing the proposed action or any reasonable alternative to be implemented; denying the action."⁴⁰ Again, the BLM is not using any of these definitions in the WOPR EIS. Instead, the BLM is increasing logging and associated logging impacts by 32% from the real no-action.

The BLM already rejected an ASQ increase in 2001. The Roseburg BLM RMP says: "As part of these third year evaluations, the allowable sale quantity will be reevaluated, to incorporate the results of watershed analyses; monitoring; further inventory; and site specific, watershed specific or province-level decisions. If an evaluation concludes that the plan's goals are not achievable a plan amendment or revision will be initiated."⁴¹

The evaluation, released in 2001, concludes:

The allowable sale quantity has been reevaluated as part of this plan evaluation to incorporate the results of watershed analyses, monitoring, further inventory, and site-specific, watershed specific or province-level decisions. The allowable sale quantity in the Roseburg District RMP ROD was described as BLM's best assessment of the average amount of timber likely to be sold and awarded annually in the planning area over the life of the plan (Roseburg District RMP ROD pg 61). Based on the information available from this evaluation of the RMP which included information through the end of Fiscal Year 1998, **there is no indication that the Roseburg District allowable sale quantity should be changed.**⁴²

By 2001, most watershed analysis and further inventories were complete. The WOPR DEIS has no basis to claim ASQ should be 32% higher in the no-action alternative simply because inventories were incomplete.

Even if the 3rd year evaluation did recommend a change in the ASQ, the RMP describes the process: "If the evaluation concludes that land use allocations or management direction need to be modified, a plan amendment or revision may be appropriate. An analysis will address the need for either. If the analysis determines that amending the plan is appropriate, the amendment process set forth in 43 CFR 1610.5-5 or 1610.5-6 will be followed. If amendment is not appropriate, NEPA procedures will still be followed before the modification is approved"⁴³

The BLM cannot now just assume an increase of 32% is appropriate to describe the current RMPs, with virtually no public disclosure, and more importantly, no NEPA on a plan amendment increasing the ASQ by one third.

⁴⁰ BLM NEPA handbook V-18.

⁴¹ Roseburg BLM RMP. 1995. Page 79

⁴² Roseburg BLM 3rd year evaluation, July 30, 2001. Emphasis ours

⁴³ Roseburg BLM RMP. 1995. page 79.

If anything, **the no-action alternative should reduce the ASQ to what the BLM has been able to legally perform.** It is unrealistic to think that a 32% increase in the ASQ is legally possible considering the new information on the spotted owl since 1995 and other ESA constraints. Yes, the ASQ is just an estimate, but looking at what the courts have said about BLM's implementation of the Northwest Forest Plan, it was an estimate that was too high, not 32% too low.

7. Intermittent Streams

There is no definition of "intermittent" in the glossary. Because the determination of intermittent is critical to the amount of riparian buffer acres, the BLM should be clear on not only the definition that will be used when implementing the WOPR, but also if that definition is the same as the definition the computer model used for developing the WOPR. This definition should be in the glossary so that it can be applied uniformly across the region.

We were told at the Medford technical workshop that the computer model used for the WOPR assumed the definition of an intermittent stream was a stream that dried up at least 3 months out of the year. It was assumed that **if a stream dried up only 2 months out of the year, it was not an intermittent stream. It was a perennial stream.**

The presenter at that workshop indicated that the ROD, or individual district managers, could choose their own definition. For instance, district managers could define an intermittent stream as one that dries up at least one month out of the year. If the computer models assume 3 months, and one month is implemented, there will be many more streams that can be clearcut right over with a 0-foot tree buffer than what was considered in the DEIS.

Definitions used should classify any streams that coho use during wet spring months as fish-bearing, even if those streams dry up during part of the year.

The DEIS does mention in a footnote on page 364: "Intermittent streams have a dry period, which is normally for three months or more." Is a footnote an enforceable definition? How will it be determined what is intermittent? Will surveys be required?

There must be consistent implementation through out the planning area. Otherwise, environmental impacts considered in EISs or BAs or BOs will be inaccurate. The implementation must follow the computer model was used in developing the DEIS.

Intermittent Stream buffers are inadequate:

The DEIS shows a picture on page 731 of what intermittent stream buffers would be under alternative 2, leaving 12 trees per acre on a 25 foot riparian buffer. The FEIS should correct this picture as it gives very misleading information. Leaving 12 trees per acre in a 25 foot buffer equated to about one tree every 170 feet. The picture shows about one tree every 50 if the trees in the picture have a 50' crown width. There should be one

tree in the picture IF the BLM was to have an accurate representation. And the one tree could be a seedling or a snag according to the current specifications.

The FEIS should explain what is the purpose of one small tree every 175 feet. It is not for down-stream wood, as debris-flow stream buffers cover that. I asked the BLM what the purpose of that one tree is and I was told that a frog could live there. If this is what the BLM really had in mind, the FEIS should disclose this.

The DEIS, page 501, says that "Alternative 2 would create a very small acreage of stand establishment with structural legacy when regeneration harvesting within riparian management areas along intermittent non-fish-bearing streams that are not prone to debris flows..." This statement is incorrect and should be removed. Alternative 2 would NOT create any stand establishment with structural legacy by retaining one small tree every 170 feet along streams.

Sediment Delivery: The sediment models in the WOPR were developed for roads and broadcast burning, not from the logging itself. The DEIS never justified ignoring this sediment delivery. The DEIS failed to consider that much of the logging in western Oregon occurs during the rainy season, when intermittent streams are running at full bank. Logging virtually every tree along these streams, including trees hanging over the streams and trees whose roots hold in the stream bank while the streams are running, is not only irresponsible, it was also not considered in the sediment delivery models.

The computer model failed to consider trees being yarded right across flowing streams, or yarded up steep hillsides above these small streams with no tree-buffers. Additionally, the BLM should have considered the effects of sediment delivery to streams from storm-events soon after logging, while there is still exposed soil on steep hillsides above the denuded stream banks.

The BLM has no basis to assume a 25' foot duff buffer will catch it all.

An exception is burning. "Approximately 50% of the regeneration harvest units would be broadcast burned." On these 50% of the clearcuts, "Under Alternative 2, approximately 200 acres per year of broadcast burning would occur along 33 miles (less than 0.5% of the total BLM intermittent stream miles) of non-debris flow, non-fish-bearing intermittent stream channels. There would be widely distributed, short-term sediment delivery for up to one year while new groundcover vegetation is being established. Fine sediment from short-term soil loss would be delivered to streams when burning within riparian areas to reduce fuel hazard loadings or for restoration purposes."⁴⁴

The BLM failed to justify how it concluded that sediment caused by broadcast burning would be caught by the 25' unburned riparian buffer along intermittent streams. The DEIS also failed to explain how any "soil loss" is "short-term". Soil takes centuries to build up – the loss of soil is never short term.

⁴⁴ WOPR DEIS page 763.

The buffer on intermittent streams is about the same as it is under the Oregon Forest Practices Act (OFPA). The BLM simply needs to look at active logging operations in the checker board to see how brown the intermittent streams run from sediment caused by the logging, not just by broadcast burning or roads.

National Marine Fisheries disapproves of WOPR Riparian buffers: In 1998 the National Marine Fisheries Service considered the effects of the Oregon Forest Practices Act (OFPA, the regulations that apply to private timber operators) on fish habitat. They concluded the OFPA riparian buffers (which are the same as, or wider than the proposed WOPR buffers) were inadequate to protect salmon:

“The loss of riparian vegetation above coho salmon habitat may increase instream temperatures downstream. Upstream reaches, including intermittent and ephemeral streams, carry sediment, nutrients, and woody debris down to salmonid habitat. The quality of coho salmon habitat is determined, in part, by the timing, speed, and amount of organic and inorganic materials transported downstream from reaches above salmonid habitat (Chamberlin et al. 1991).”⁴⁵

“ODF Riparian rules do not provide adequate buffers for small non-fish perennial and intermittent streams to provide even basic water temperature protection, let alone allow for adequate LWD recruitment to small streams for sediment storage, channel roughness and pool formation (moderates flows during peak events and during late season low flows).”⁴⁶

The NMFS gave far more importance to small, intermittent headwater streams for the survival of Coho salmon, than the BLM does in WOPR alternatives:

“Like many species of anadromous salmonids, coho salmon have a wide-ranging life cycle—depending for their survival on high quality environments from the headwaters of coastal streams down to the estuaries and on to the far reaches of the North Pacific Ocean.”⁴⁷

The NMFS determined that the OFPA was inadequate and that more “conservation measures should be employed to help ensure salmon survival”⁴⁸ For intermittent streams, as opposed to the 0’ tree-buffer BLM is proposing, the NMFS thought that a riparian management zone should be 75 to 100 feet wide in the coastal mountain range, measured horizontally.⁴⁹ “This RMZ may be partially entered for limited silvicultural treatments aimed at growing and retaining mature trees (e.g., pre-commercial and commercial thinning). Within the RMZ, a relative density of at least 30 would be maintained... RMZ widths include allowances for windthrow of about 15% within the first decade after the canopy has been removed in the adjacent upland forest, so there would generally not be a need to extend this RMZ to account for windthrow.”⁵⁰

⁴⁵ A Draft Proposal Concerning Oregon Forest Practices. Submitted by the NMFS to the Oregon Board of Forestry MOA Advisory Committee and the Office of the Governor. February 17, 1998. Page 62.

⁴⁶ Id. Page IV-5

⁴⁷ Id. Page 15.

⁴⁸ Id. Page 41

⁴⁹ Id. Page 45.

⁵⁰ A Draft Proposal Concerning Oregon Forest Practices. NMFS. February 17, 1998. Page 45

If this is what the NMFS recommended for private landowners in 1997, the BLM failed to justify why at least this buffer zone width was not in the preferred alternative, or why there is no allowance for windthrow on any buffers.

Windthrow: Clearcutting, leaving straight-edge riparian buffers, whether they are 100 feet under alternative 2 for fish-bearing streams, or 50 feet under the Coquille Cooperative Forest Management area, or the one lonely tree every 170 feet next to most streams, the riparian buffer will likely have significant impacts from blow down. The DEIS failed to consider this Windthrow, as well as other edge effects to Riparian buffers. Instead, the DEIS assume that there will be a certain area of late-successional forest within those buffers. But there will not be as much as the DEIS considered because the edge effects will significantly degrade the lineal forest habitat. Windthrow could even occur all the way to the stream being buffered.

Large Wood: The DEIS says, page 344, “The majority of wood that falls into stream channels from adjacent forests occurs within a distance of one tree height away from the channel”. Therefore, by having only a 100’ buffer on fish-bearing streams, in areas where the average site-tree height is 220 feet, the BLM is depriving those streams of about 50% of the wood that falls into the streams. The BLM is especially depriving those streams of the upper half of trees, the crowns, from falling into streams. The DEIS failed to explain the value of crowns in trapping sediment and providing effective pools, as opposed to large boles that often fall over the stream and take more time to break and fall into the streams.

In other words, the upper half of the trees that fall into streams, from 100 to 200 feet away, provides an important niche in the ecosystem of riparian areas. The BLM failed to recognize this or account for it in the DEIS.

8. Marbled Murrelets

The WOPR fails to fully protect Marbled Murrelets, as required by the Endangered Species Act. Alternative 1 states that LSMAs include the areas of “contiguous marbled murrelet habitat and recruitment habitat (stands capable of becoming habitat for the marbled murrelet within 25 years) that are within 0.5 mile of any occupied site.”⁵¹ But in alternative 2, the LSMAs only include “the areas of contiguous marbled murrelet habitat and recruitment habitat (stands capable of becoming habitat for the marbled murrelet within 25 years) that are within 0.5 mile of occupied sites identified as of the end of the 2005 field season.”⁵²

In other words, any murrelet site identified after the 2005 field season could be clearcut. Known murrelet sites discovered in the 2006, 07 and 08 field seasons would be allowed to be destroyed. Additionally, no additional surveys would occur, thus any nesting birds

⁵¹ WOPR DEIS page 68.

⁵² WOPR DEIS page 76.

in proposed clearcut units would not be able to reproduce. This amount of take should not be allowed for these imperiled birds.

The DEIS failed to consider the impact to the population with this level of nesting disturbance. Instead, the DEIS says that “effects to populations were not analyzed because population size is affected by numerous factors other than habitat”⁵³ such as ocean conditions. The impact on nesting habitat should have been considered in the DEIS anyway. Science shows that quality nesting habitat increases the health of a population. Instead, the DEIS is saying that even if all but a few nesting sites were eliminated, there would no impact on the health of the population. There is no basis for this assumption. The DEIS analysis is dependent onto the new proposed recovery plan which eliminates 95% of the nesting habitat. This is just a proposal which is scientifically flawed and will not be implemented.

The DEIS tell us that under some of the existing CHU’s, murrelet nesting habitat would increase under alternative 2 – “nesting habitat would increase under alternative 2 from 218,000 acres to 287,000 acres... in critical habitat units” in 100 years⁵⁴ But what is unclear is how that compares with the total CHU now protected on BLM lands, 462,953 acres⁵⁵. Also not clear is the quality of the habitat. The BLM is relying on **in-growth** of existing plantations and burned over areas to calculate an increase in murrelet “nesting habitat”. In fact, what appears to happen is that quality habitat would be clearcut, and in-growth would be relied on to provide lower quality habitat. The BLM failed to consider, disclose, or analyze this in the DEIS.

“Actual nests and behaviors indicate that marbled murrelets select old-growth forests for nesting.”⁵⁶ Yet for this plan revision, “nesting habitat was modeled as those stands in the mature and structurally complex structural stages of forest.”⁵⁷ Instead, the plan revision should have modeled on high quality, old growth habitat.

The DEIS says that “data used for this analysis [acres of nesting habitat] does not distinguish between the 30 inch and greater diameter class, the assumption is that the majority of those stands would fall into the structurally complex structural stage classification.”⁵⁸ That assumption is likely wrong. In 100 years, recovered plantations at the coast could have many trees over 30 inches, yet large limbs needed for nesting and other complex structural stage indicators would be missing. Or perhaps the “majority”, or 51%, of stands over 30” DBH would be structurally complex, but 49% of stands that are not will doom half the murrelet nests.

The WOPR’s claims that habitat will increase in 100 years is based on the assumption that the decreases in habitat in 50 years won’t extirpate the birds. “In the shorter term (50 years), there would be an overall decrease in marbled murrelet nesting habitat of 16%

⁵³ WOPR DEIS 674

⁵⁴ WOPR DEIS page 1060

⁵⁵ WOPR DEIS page 307.

⁵⁶ WOPR DEIS page 302.

⁵⁷ WOPR DEIS page 203.

⁵⁸ WOPR DEIS 675

under alternative 2 and 14% under alternative 3 compared to the current condition.”⁵⁹ The areas with the best quality nesting habitat, Coos Bay and Roseburg BLM, will decrease the most. “The Coos Bay and Roseburg districts show decreases at 10, 20, and 50 years under Alternatives 2 and 3.”

The areas that currently have the poorest quality habitat, Salem and Eugene BLM, will increase habitat the most⁶⁰, demonstrating how the BLM will clearcut the best habitat, and rely on in-growth to provide poorer habitat in the future, assuming there are any murrelets left after 50 years.

9. Northern Spotted Owl

The DEIS described the status of the owl, but studies cited stopped at 2005. The FEIS should update this information. If the FEIS is released in 2009, those studies will be about 5 years old. The world of the spotted, vs barred owls is rapidly changing. For instance, in the Roseburg District, in the Tye study area, 1/3rd of the owl population has declined in just the last two years. This was an area that is always touted as “stable”. The DEIS assumes it is stable. But current information shows it is rapidly declining. The FEIS must use the current information.

To comply with the requirement to ensure habitat for 20 pairs of spotted owls in the LSMAs, they will have to expanded to include almost all old-growth available on BLM lands because of the declining spotted owl population.

10. 3P fall, buck, sampling, should not be an administrative action

The DEIS has defined *3P fall, buck, and scale* sampling method as an administrative action. This is wrong. Administrative Actions are benign routine actions that require no further NEPA, whereas 3P sampling in older stands involves cutting down hundreds of old-growth trees before any site-specific NEPA decision is made to implement a timber sale. Logging hundreds of old growth trees, perhaps thousands of old growth trees over several years, even stream-side old growth trees in Riparian Reserves, is not benign, and must have site-specific NEPA analysis. For more details on this subject, see the Umpqua Watersheds 9-7-00 appeal of Roseburg BLM 3P Fall, Buck and Scale Cruising. Also see Umpqua Watersheds et al comments to the BLM on 2-22-06 regarding the Draft Revisions to Chapter 11 of the DOI’s NEPA Manual. There we detailed the problems of including Sample Tree Felling in Administrative Actions and the requirement for a NEPA process to consider before this type of destructive sampling in old growth forests is implemented.

⁵⁹ WOPR DEIS page 678

⁶⁰ WOPR DEIS figure 233.

11. Principles of sustained yield, and fertilizers

The DEIS states that “The purpose and need for this proposed action is to manage the BLM-administered lands for permanent forest production in conformity with the principles of sustained yield...”⁶¹ While “sustained yield” was in the glossary, the “principles” were not. The DEIS failed to enumerate how many principles there are, and what they are.

In the Roseburg BLM district alone, 26,000 acres of 200+ year old forests would leave the current reserves and be put into timber management areas under alternative 2.⁶² Which principle of sustained yield does this action fall under? The BLM should be clear on the principles, because the Webster definition of “sustained” would require the wildlife dependent on those reserves to be sustained. Since the BLM has developed as-yet-undisclosed principles that apparently differ from the standard definitions, the DEIS should have listed the principles.

Is dependence on fertilizers to meet ASQ targets one of the *principles*? There is a lot of information on the harmful impacts of fertilizers in the environment that was never considered in the DEIS. Please refer to past comments from Umpqua Watersheds (10-21-05 and 3-14-06) concerning the question on if the BLM has indeed been logging according to the “principles of sustained yield”, and the harmful effects of fertilizers. According to reasonable principles, the BLM should stop all logging of native forests and concentrate on thinning in managed plantations.

12. Cubic feet vs. board feet

The BLM should revert to selling timber in cubic feet. It is a much more accurate measurement to determine volume in today’s market that uses whole lots for a variety of purposes. The BLM will have an easier time meeting any target if cubic feet is used because it is a more accurate measurement. The Forest Services sells in cubic feet. Only the BLM is left in the dark ages. The 1995 RMPs decided to sell in cubic feet⁶³, but for unexplained reasons, the BLM never made the leap. Now is the time.

13. Rural Interface Areas

The current RMPs contain “Rural Interface Areas”, but these have been eliminated from even the no-action alternative of the WOPR DEIS, without disclosure or explanation. In the current Roseburg BLM RMP, Rural Interface Areas are “acres considered for alternative management practices” and “acres where clearcutting, herbicide spraying, and prescribed burning [are] excluded”. This is BLM’s good neighbor policy. Because of the checkerboard nature of BLM’s lands, the BLM has many rural families and farms next to

⁶¹ WOPR DEIS page 3

⁶² Email from Robert Hall, Roseburg BLM, 10-31-07

⁶³ Roseburg BLM RMP page 61.

public lands. Many of these rural families have historically depended on the adjoining public forests for their household drinking water and an aesthetic resource for themselves and for increasing their property value. As such, the BLM has cared for "rural interface areas" with these values in mind. The restrictions on rural interface areas should have been strengthened, not eliminated in the DEIS! This oversight must be corrected. One impact of eliminating Rural Interface Area protections could be the spraying of 2,4D and other nasty chemicals where children play and closer to water-intake spring boxes.

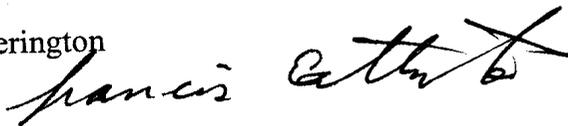
14. Economic Impacts

The DEIS fails to fully consider the economic impact of leaving public forests standing and beautiful, in a new age of high-speed internet. Now, more than ever before, people can live where they want while retaining business clients around the world. Just in Roseburg alone, a new professional class is emerging providing business income and jobs that are dependent on clients in Los Angeles and Tokyo. Recently, a web-designer business relocated to Roseburg, because it provided a high quality-of-life, while retaining their major client, Nike. Another new business in town sells drilling equipment. Because their business is web-based, they can locate anywhere in the world, and still sell drilling equipment to anywhere in the world.

Now, more than ever, timber-dependent communities have a chance of diversifying their economies. The best chance for Roseburg is by offering a high quality-of-life choice, and that quality of life comes, in a large part, from the BLM checkerboard around our houses and towns. The DEIS failed to fully consider the negative economic impact of clearcutting these public forests.

Thank you for the opportunity to submit these comments. Please develop another alternative that retains all remaining mature and old growth forests, while thinning overstocked tree plantations. We incorporate by reference the scoping comments of Umpqua Watersheds, dated 10-21-05, and WOPR DEIS comments from Oregon Wild.

Sincerely
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