

**Response To the Western Oregon Plan Revision  
Draft Environmental Impact Statement**

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January 10, 2008

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**RE: Response to Western Oregon Plan Revision Draft Environmental Impact Statement**

Dear Ed Shephard, Dick Prather and WOPR Project Team,

**Objections**

I am submitting these comments on behalf of myself and the Deer Creek Valley Natural Resources Conservation Association (DCV) as their advisor. We object to the 1600 page Western Oregon Plan Revision (WOPR) Draft Environmental Impact Statement (DEIS) tree stand definitions, assumptions, information, and conclusions. **We object to DEIS omissions of essential information and the omission of realistic adverse effects that proposed Alternatives would have on forest ecosystems and human communities.**

**Assumptions**

When you have wrong assumptions you debate wrong issues, and arrive at wrong conclusions. **The WOPR Team has wrong assumptions, wrong debates, and wrong solutions!**

When you have wrong assumptions you debate wrong issues, and arrive at wrong conclusions.

**Credentials**

A fatal flaw in WOPR assumptions is that forest managers don't have the credentials needed to sustainably manage a forest. No one on the Team has sustainably managed a forest ecosystem using any tree stand management strategy proposed in WOPR's Alternatives. Contrary to DEIS claims, all WOPR Alternatives would cause increasing species extinctions, and worsen Oregon's existing irrevocable forest and community catastrophes. **WOPR DEIS Alternatives demonstrate a lack of Team credentials for developing a Western Oregon Forest Plan, and reason for abandonment.**

Contrary to DEIS claims, all WOPR Alternatives would cause increasing species extinctions, and worsen Oregon's existing irrevocable forest and community catastrophes.

## "Glossary" (Page 855)

### Definitions

"This chapter provides the definitions of terms used in this document that cannot be found in a standard dictionary." (Page 855)

### Background

The timber industry assumes special agricultural growing status and privileges. The timber industry is the only crop processing industry that assumes forest land has been set aside specifically for growing trees to serve its own special interests. Forest tree interests are incorrectly prioritized at the expense of virtually every other forest value. The timber processing industry crafted forest terminology to serve tree crop objectives. **The WOPR Glossary incorrectly assumes timber processing industry crafted, self-serving, tree stand terminology.**

The timber processing industry crafted forest terminology to serve its profit driven objectives.

### Incorrect assumptions

WOPR's tree stand agendas and assumptions, are camouflaged in the DEIS Vol II Glossary (Page 855). Glossary terms conceal tree stand agendas through omissions. Creating a tree stand Glossary, shifts perceptions from forest ecosystems to tree stand perspectives.

Creating a tree stand Glossary, shifts perceptions from forest ecosystems to tree stand perspectives.

**DEIS subjects are loaded with tree stand terminology, assumptions and conclusions that are erroneous, arbitrary and capricious.**

WOPR's focus on tree stand Alternatives, incorrectly shifts public awareness away from ecosystem centered alternatives such as the Natural Selection Alternative (NSA) that would retain biologically and ecologically healthy forest ecosystems. WOPR's tree based language tricks people into supporting non sustainable tree stand management alternatives instead of sustainable ecosystem centered alternatives. **All WOPR Alternatives would cause devastating consequences to Oregon's forests and community health, but the DEIS is incorrectly inferring forest and community health would be improved.**

The WOPR is tricking people into supporting non sustainable tree stand management alternatives instead of sustainable ecosystem centered alternatives.

WOPR's DEIS tree stand management conclusions might make a few timber people money rich, but it won't prevent irrevocable forest and community catastrophes. **A forest ecosystem environmental impact statement**

WOPR's DEIS tree stand management conclusions might make a few timber people money rich, but it won't prevent an irrevocable forest and community catastrophes.

**that omits analysis of human actions on species, their functions, and their environment is not a credible EIS.**

A credible EIS requires science based assumptions and analysis, the WOPR DEIS has neither. The WOPR Team has the responsibility of developing a credible DEIS. No one can know everything needed to make it credible, and that's ok. But when the Team thinks they know something they don't, that's not ok. **When the WOPR Team refuses to hear what others with far better credentials are saying, that's unacceptable, and that makes the WOPR unacceptable.**

When the Team thinks they know something they don't, that's not ok.

**Fatal assumptions**

The WOPR is written in ways that conceal tree stand crop agendas through omissions of countless critically important forest ecosystem data. **Incorrect WOPR Glossary term definitions create a foundation for incorrect forest assumptions and data.** For example:

WOPR's Glossary is written in ways that conceal countless important forest values.

**"Forest land: Land at least 10 percent stocked by forest trees of any size, and including land that formerly had such tree cover and that will be naturally or artificially regenerated." (Page 862)**

This 'forest land' definition, "stocked by forest trees" incorrectly defines forest land stocked with trees as stocked forests. When forests are clear-cut, simply planting trees meets forest land tree "stocking" requirements. "Stocked by forest trees" does not mean stocked by forests. **WOPR's Glossary incorrectly omits the definition of the forest BLM is supposed to be managing.**

"Stocked by forest trees" does not mean stocked by forests.

Defining 'forest land' as land stocked by trees, fraudulently implies that forest land planted and "stocked" with trees, is a forest. Managing forests for trees is managing for forest liquidation. **Defining, and managing "forest land" for tree stocking is incorrect, and misleading.**

Managing forests for trees is managing for forest liquidation.

No one can sustainably grow tree stands without the rest of the forest. Defining 'forest land' as land stocked by trees is an incorrect definition. Writing a plan for managing tree stands is not a sustainable plan, and managing forests for tree stands

Writing a plan for managing tree stands is not a sustainable plan, and managing forests for tree stands liquidates forests.

liquidates forests. **Excluding a scientific definition of the forest to be managed from the Glossary, effectively excludes Oregon's forests, which makes this WOPR an erroneous forest plan.**

Forests are ecosystems with thousands of species and millions of interconnected, mutually dependent organisms functioning as a regulatory body to sustain environments required to sustain each of its parts and the forest as a whole, including trees. Trees require this regulatory system for survival. Anyone writing an acceptable forest land definition, or accepting one, must be aware of the ecosystem that surround trees. Definitions are critical to developing correct forest plan assumptions. A credible forest plan Glossary must include a scientifically credible forest ecosystem definition. **The failure of the WOPR DEIS to identify and define the forest ecosystem that surrounds and sustains trees, makes all WOPR Alternatives erroneous.**

A credible forest plan Glossary must include scientifically supported forest ecosystem definitions.

The WOPR DEIS is clearly a politically driven advertisement to sell the ideology that public forests need to be cut down, converted into tree stands, and managed as tree stands. All of this would be, unbeknownst to taxpayers, at their expense. **WOPR's Glossary provides the framework for volumes of erroneous tree stand assumptions and conclusions which also means all Alternatives are erroneous.**

None of the WOPR DEIS Alternatives would, or could, sustain forests.

## Northwest Forest Plan

### “Background / Northwest Forest Plan” (Page 8)

“The management direction contained in the 1994 Northwest Forest Plan (NWFP) was designed to respond to the need for both forest habitat and forest products (NWFP ROD, p. 25). In selecting Alternative 9 (which became the NWFP), ... we adopt the alternative that will both maintain the late-successional and old-growth forest ecosystem and provide a predictable and sustainable supply of timber” (NWFP ROD, p. 26) (Page 8).

The NWFP is a tree stand plan with ecosystem inferences. Because it is a tree stand plan, it failed to adequately respond to the need for both forest habitat and forest products.” The NWFP failed to maintain late-successional and old growth ecosystems, it failed to “provide a predictable and sustainable supply of timber” using any tree stand management option. The NWFP is a failed forest management experiment and WOPR's tree stand Alternatives would result in even greater failures. **The only way a Western Oregon Forest Plan Revision can be truly sustainable is**

The NWFP is a failed forest management experiment and WOPR's tree stand Alternatives would result in even greater failures.

through science-based premises which neither NWFP nor WOPR have.

"The decision to select Alternative 9 was an attempt to balance the two purposes of forest habitat and forest products. The balancing was primarily accomplished through land allocations — .

### Forest habitat versus products

Balancing the "two purposes of forest habitat and forest products," regardless of what this actually means, requires retention of ecosystems that other species create. People can't create sustainable forest ecosystems, we have to rely on other species, and that means retaining essential ecosystem species, functions and environments. Retaining the natural regulatory system across the forested landscape is required for achieving a sustained yield of forest products. Forest ecosystems can't be sustained through designated tree stand plantation allocations. **WOPR "Land allocations" are inconsistent with sustaining forest regulatory systems that will "provide a predictable and sustainable supply of timber."**

Forest ecosystems can't be sustained through designated tree stand plantation allocations.

### Management assumptions

No one knows how to sustainably manage for the functions that other species do. No one has ever restored a forest, no one knows how to, and there is no credible evidence to indicate anyone ever will. **The WOPR incorrectly assumes that humans can sustainably manage natural forests as tree stand plantations.**

No one has ever restored a forest, no one knows how to, and there is no credible evidence to indicate anyone ever will.

## "Introduction" (Page 3)

"The existing RMPs are consistent with the 1994 Northwest Forest Plan, adopted by the Department of the Interior and the Department of Agriculture for federal forests within the range of the northern spotted owl as an "ecosystem management plan for managing habitat for late successional and old-growth forest related species." The proposed action is to revise the RMPs with land use allocations and management direction that best meet the purpose and need. (Page 3)

### The problem of managing for spotted owl habitat

Forest management is far the leading cause of lost spotted owl habitat, and risk of their extinction. There is a lack of data to support the contention that existing RMPs are consistent with sustaining ecosystems suitable for the spotted owl. There also is no data to support the contention that WOPR

The fatal flaw lies in the contention that humans can develop a forest management plan that will do better than Nature.

Alternatives would be better than the NWFP, and a lot of data which indicates they would be worse. The fatal flaw lies in the WOPR contention that humans can develop tree stand management plans that will do better at sustaining forests than Nature.

We live in a culture that mistakenly believes people need to manage forests for trees, and occasionally some other essentials. Its evident to me that no forest manager has improved on forest health or its productivity, and I've yet to see data to support the ideology that anyone can. We simply have no evidence to support the belief that humans can manage forests sustainably, and by continuing to do so we are increasing other species risks of extinction, and ours.

We simply have no evidence to support the belief that humans can manage forests sustainably, and by continuing to do so we are increasing other species risks of extinction, and ours.

### Spotted owl solution

The WOPR rejected NSA, is the only Alternative currently demonstrating on the ground at Camp Forest where these concepts originated, its ability to restore, retain and sustain habitats for many threatened species, including the spotted owl. I haven't managed Camp Forest (where NSA concepts

originated) for forty years and I challenge the WOPR Team and politicians to show me a better way to improve on forest health, timber productivity, spotted owl habitat, or any other forest use. I've yet to see anyone manage a forest for greater sustainable yields or more uses than the other species that create and sustain forests. **The WOPR Alternatives are not sustainable solutions to loss of spotted owl habitat.**

I've yet to see anyone manage a forest for greater sustainable yields or more uses than the other species that create and sustain forests.

"The BLM is proposing to revise existing plans to replace the Northwest Forest Plan land use allocations and management direction because (1) the BLM's plan evaluations found harvest levels have not been achieving the timber harvest levels directed by existing plans, and the BLM now has more detailed and accurate information than was available in 1995 on the effects of sustained yield management on other resources. (2) there is an opportunity to coordinate the BLM management plans with new recovery plans and re-designations of critical habitat currently under development and (3) the BLM has re-focused the goal for management of the BLM administered lands to the objectives of its statutory mandate to utilize the principles of sustained yield management on the timber lands covered under the O&C Act of contributing to the economic stability of local communities and industries, and other benefits from such management to watersheds, stream flows, and recreation." (Page 3)

The BLM's proposed alternatives, are based on the same forestry deforestation management practices that caused our current

BLM's Preferred Alternative would not and could not meet BLM's own purpose and need, nor will it meet all applicable laws.

high fuel and fire hazards, biological, ecological, environmental, social and economical disasters, and brought us to our current forest and community crisis. BLM's Preferred Alternative would not and could not meet BLM's own purpose and need, nor will it meet all applicable laws. **BLM forest tree stand plantation management practices are not sustainable, never have been sustainable, and cannot be made sustainable.**

### **Range of alternative assumptions**

**"The selected alternative for the Northwest Forest Plan was selected because it would maintain the late-successional and old-growth forest ecosystem and provide a predictable and sustainable supply of timber, recreational opportunities and other resources at the highest level possible." (Page 3)**

The NWFP did not "maintain the late-successional and old-growth forest ecosystem" nor did it "provide a predictable and sustainable supply of timber, recreational opportunities and other resources at the highest level possible." A much better alternative in the form of a tree-centered version of the Natural Selection Alternative (NSA) submitted for WOPR consideration, was previously submitted for the NWFP, but it was rejected, this time without giving any reason. Had the tree-based version of the NSA been adapted, it would have retained far healthier forests than Option 9 did and it would have met legal requirements.

### **"Purpose and Need for the Plan Revisions" (Page 3)**

**"The purpose and need for this plan revision is focused on specific legal requirements and intended benefits of the BLM's unique mandate under the O&C Act, distinct from the mandate to the U.S. Forest Service under National Forest Management Act." (Page 3)**

If the WOPR plan would focus on an alternative that would sustain both forest ecosystem and human needs, legal requirements would likely be met. The NSA may be the only alternative that meets both legal and National Forest Management Act requirements.

### **Sustained yield assumptions**

**"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, consistent with the O&C Act." (Page 3)**

"Permanent forest production in conformity with the principles of sustained yield," requires retention of environments that will sustain all of the species that create and sustain them.

### **Dominant use**

**"The plans will also comply with all other applicable laws including, but (Page 3-4)**

**"The Ninth Circuit in *Headwaters v. BLM*, 914 F.2d 1174 (9th Cir. 1990) confirmed that in the O&C Act Congress mandated timber production as the dominant use of these**

Anyone that "mandated timber production as the dominant use of these BLM-administered lands" is out of touch with forest and community realities. Why would timber production be mandated as a dominant use when it destroys forest ecosystems that sustain optimum sustainable timber yields? Why would timber production be mandated as a dominant use when it costs taxpayers money to implement. Why would timber production be mandated as a dominant use when it adversely affects virtually every forest value and use, including timber production? **If this WOPR statement is not incorrect, the Ninth Circuit Court ruling must be.**

### **What is an ecosystem?**

The **biosphere** is the part of Earth within which life occurs. It includes the layer of gases that surround Earth, water in all forms, and outermost crust. **Gaia** is based on the idea that planet Earth can be seen as a living organism, where all things are connected. **Cosmos** expands the Gaia idea to include the universe. An **ecosystem**, a contraction of "ecological" and "system," is a collection of components and processes that comprise a loosely connected biosphere subset community. Ecosystems can be an ocean, continent, island, lake, forest, meadow, watershed, or a dead tree. Each ecosystem subset has its own peculiar self governing regulatory system.

**Forests** are major biosphere ecosystem subsets that have trees. Forests have countless numbers of smaller ecosystem subsets, each with peculiar climates, species, communities, structures, and regulatory functions. Forests host tens of thousands of species and countless ecosystem subsets, each with their own peculiar survival strategies adapted to surviving in their own peculiar ecosystem subsets. We are hugely dependent on forest species, their functions, and their regulatory system to sustain forests and us. Thousands of species are involved in creating and sustaining forests, none of them humans. This is not the forest ecosystem that WOPR Alternatives would be managing for!

This is not the forest ecosystem that WOPR Alternatives would be managing for!

**The WOPR DEIS failed to assess forest ecosystems, their subsets, their functions, or their importance for sustaining life. Why?**

**A credible WOPR DEIS would analyze the cumulative effects of forest management on ecosystem subsets which cumulatively affect the biosphere, life on Earth, and our survival; it didn't. Why?**

**A credible WOPR DEIS would analyze the adverse impacts of forest management on forest species, their environments, and how this adversely affects us; it didn't. Why?**

**A credible WOPR DEIS would acknowledge and deal with ecosystem basics, it would address the needs of forest ecosystem species so that human needs can be met; it didn't. Why?**

**A credible WOPR DEIS would analyze whether or not alternatives would retain basic ecosystem essentials; it didn't. Why?**

**A credible WOPR DEIS would analyze the kinds of human relationships needed to retain healthy sustainable forest ecosystem subsets, not how to cut them down and manage them as tree stands; it didn't. Why?**

### **Ecosystem Subsets**

Forest species adapted their peculiar traits and survival strategies over thousands of years to peculiar environmental subset conditions. Each species relies on relatively stable subset conditions for their continued survival. Everything in the biosphere is connected. We are not separate from these biosphere ecosystems, and we depend on them in countless ways to provide our needs.

All WOPR Alternatives would require increased management of forest ecosystem environments, insuring even more environmental incompatibility with the countless numbers of species that depend on them, including ourselves.

All WOPR Alternatives would require increased management of forest ecosystem environments, insuring even more environmental incompatibility with the countless numbers of species that depend on them, including ourselves. **A credible WOPR DEIS would evaluate the cumulative effects of forest management in terms of sustaining each peculiar ecosystem subset, its species, its environment, and humans; it didn't. Why?**

Sustainable forest relationships, necessitate retaining suitable environments for all of the species that create and sustain forests, including trees. Humans don't know how to do this. Managing forests as tree stand plantations has not sustained forests or tree productivity. The species that create and sustain forests must be allowed to continue doing it. **None of the WOPR Alternatives would retain forests.**

#### **WOPR Alternatives**

Tree stand management practices have not been sustainable, nor are they likely to become sustainable. WOPR Alternatives use the same tree stand deforestation management practices that brought us to our current forest crisis, and they will not bring sustainable solutions. **WOPR Alternatives are based on faulty assumptions.**

#### **Who's Purpose and need**

WOPR's management Alternatives are based on the same incredulous thinking that caused forest and community catastrophes. These are the same kinds of forest management practices that caused our current high fuel and fire hazards, biological, ecological, environmental, social and economical disasters. **The WOPR Alternatives would result in BLM continuing the forest conversions into tree stands, doing the bidding for the timber processing industry, paying for restoration costs, and at taxpayer expense. WOPR Alternatives would not, and could not, meet its Purpose and Need.**

## Trait-Environment Compatibility

Increasing human disregard for the species that sustain us, is causing their extinction and increasing our risks. Understanding how other species create and sustain forests, and humans, helps us to achieve sustainable relationships with them. **A credible WOPR DEIS would recognize that humans can't manage to restore cut down forests; it didn't. Why? A credible DEIS would analyze the kinds of human relationships required to achieve a sustainable forest plan; it didn't. Why?**

Increasing human disregard for the species that sustain us is causing their extinction and increasing our risks.

## Ancient Forests

All WOPR Alternatives would contribute to the destruction of our last remaining islands of natural ancient forest ecosystems. Species that depend on ancient forests for survival would go extinct, and there would be no way for these species to restore or sustain ancient

forests. Cutting down the last remaining islands of natural old forests would prevent cut down forests from being restored. **We object to WOPR DEIS omissions of information relative to extinctions caused by past forest management practices.**

Cutting down the last remaining islands of natural old forests would prevent cut down forests from being restored.

## "Alternatives" (Page 27)

**"Chapter 2 of this draft environmental impact statement defines the alternatives that were developed for the six resource management plans of the planning area that are being revised." (Page 27)**

WOPR Alternatives, are tree stand management alternatives

## "Introduction" (Page 29)

**"This chapter describes the No Action Alternative and three action alternatives. The No Action Alternative would continue the management of the current resource management plans, which were approved in 1995 and subsequently amended." (Page 27)**

A "No Action Alternative" is supposed to be just that. This statement clearly "describes the No Action Alternative and three action alternatives." It also clearly states that "the No Action Alternative would continue the management of the current resource management plans." Most people including myself rightly thought the No Action Alternative meant what this statement said. Few people likely read a much later imbedded statement on page 65 that completely contradicts this one.

"The three action alternatives consist of a range of management strategies that are designed to meet the purpose and need discussed in Chapter 1. These management strategies encompass management objectives, management actions, and land use allocations." (Page 29)

"• **Management objectives.** Descriptions that specifically describe the desired outcomes from the management of particular resources, which are usually expressed in terms that are quantifiable and measurable." (Page 29)

"Desired outcomes" (implied by Glossary definitions but not specifically stated), are forests managed for tree stands.

"• **Management actions.** Proactive measures that will be applied to activities to achieve the management objectives for resources." (Page 29)

"• **Land use allocations.** Identifiers that designate which activities are allowed, restricted, or excluded in all or part of a planning area." (Page 29)

"Some management objectives, management actions, and land use allocations are common to all three action alternatives and some vary by action alternative. These differences would result in a variance in the degree or rate in which they achieve the identified purpose and needs for the proposed action." (Page 29)

Note that this discussion refers to "three action alternatives."

### "Management Common to All Action Alternatives" (Page 29)

"This section identifies the management objectives and management actions that would apply under the three action alternatives. The next section identifies what is unique between the individual alternatives." (Page 29)

Note that this statement continues referring to three action alternatives.

"Management actions would be used only where and when necessary and practical to achieve management objectives. For example, the BLM may decide not to take a management action when:

- Site-specific circumstances would make the application of the management action unnecessary to achieve resource management plan objectives.
- Site-specific circumstances would make the application of the management action impractical.

- The application of the management action would be inconsistent with other resource management plan decisions.

Activities that are not specifically mentioned in the management actions would be permitted if they are consistent with management objectives." (Page 29)

BLM says: "Activities that are not specifically mentioned in the management actions would be permitted if they are consistent with management objectives." In other words, whatever the management objectives are, or might be (and who knows what that might be), they are consistent with this plan. It seems to me that anything consistent with managing forests for trees meets the

objectives of this plan. **Why do we need a 1600 page forest plan to meet this objective?**

### **“The Alternatives” (Page 64)**

“This section describes what is unique between the individual alternatives. The previous section identified the land use allocations, management objectives, and management actions that would apply to the resources, programs, and land use allocations under the three action alternatives. Management actions would be used only where and when necessary and practical to achieve management objectives. The following would be among the considerations in determining how and where to appropriately implement management actions:

- Site-specific circumstances made the application of the management action unnecessary to achieve resource management plan objectives.
- Site-specific circumstances made the application of the management action impractical.
- The application of the management action would be inconsistent with other resource management plan decisions.

Activities that are not specifically mentioned in management actions would be permitted if they are not inconsistent with management objectives.” (Page 64)

What is not “unique between the individual alternatives” is tree stand management objectives. How that is achieved doesn’t seem to have parameters, and that is scary. **WOPR tree stand management objectives are not credible.**

### **“Preferred Alternative” (Page 64)**

“The preferred alternative is the alternative that best meets the purpose and need (see *Chapter 1*). Based on the analysis in this draft environmental impact statement, the BLM identifies Alternative 2 as the preferred alternative. Considering the economic, environmental, social, and other selection factors, the BLM believes this alternative would best fulfill its statutory mission and responsibilities. Alternative 2 would:

- contribute to the recovery of species listed under the Endangered Species Act,
- maintain or improve water quality,
- reduce fire hazard risks in most districts,
- meet recreational demand with a variety of recreational settings, and
- produce the highest economic return to local communities from a sustained yield of timber.” (Page 64)

Wrong! Forest stocking assumptions, tree stand analysis, and tree stand conclusions make the WOPR Preferred Alternative not a preferred forest ecosystem or community alternative. It cannot fulfill its true “statutory mission and responsibilities” if for no other reason than the fact that forests are not simply tree stands as this WOPR implies.

There is no data to support the contention that any tree stand alternative would “contribute to the recovery of species listed under the Endangered Species Act. In fact quite the opposite would occur. Data doesn’t support the contention that any alternative would “maintain or improve water quality” wherever they implemented, much less “in most areas.” These are the same management practices that are leading causes of our high forest fuel and fire hazard conditions. Opening up canopies and converting old forests into young tree plantations causes increased fuel

and fire hazard risks. Natural forests have highest recreational values by far and these alternatives would liquidate them, leaving thrashed forests to recreate in.

Economic returns are relative to forest net worth. Forest net worth is relative to green foliage and natural forests have the most. None of the tree stand management practices proposed have produced “highest economic return to local communities from a sustained yield of timber,” and there is no data to support the contention they will, or can.

“Comments from state and federal agencies, local governments, tribes, and the public on this draft environmental impact statement will assist the BLM in preparing the proposed resource management plans and the final environmental impact statement. These comments can be used by the BLM to modify an action alternative to create a proposed decision. Examples of modifications that the BLM will consider in developing the proposed resource management plans are:

- Increasing the fire resiliency of forests in the Medford District and the Klamath Falls Resource Area of the Lakeview District.
- Ways to manage the harvest land base that will increase the rate of recovery of the northern spotted owl and the marbled murrelet in the short term (less than 50 years) while suitable habitat develops in the large blocks managed for long-term recovery.
- Speeding the redevelopment of structurally complex forests after regeneration harvesting.” (Page 64)

If the past is an indication, BLM will simply try to cover their legal obligations and try to force some version of these incredibly incredulous experiments down our throats. The NSA would have provided far the best alternative for “speeding the redevelopment of structurally complex forests after regeneration harvesting,” but only if the thousands of species that create and sustain them are still around, which they’re not likely to be. Once again, incredulous forest land assumptions lead to incredulous forest management assumptions.

### **“No Action Alternative” (Page 65)**

This is the disclaimer chapter from what was stated in earlier chapters. This chapter is an attempt to close the door on any alternative that would retain current forest management practices or change from tree stand management to ecosystem centered practices, such as the NSA uses.

“Implementation of these two plan amendments would change the effects of the No Action Alternative from the effects analyzed in this environmental impact statement.” (Page 65)

BLM’s WOPR disclaimer from the earlier “No Action Alternative” comes in the form of “two plan amendments.” **The title of this chapter should be “Amendments,” or “Disclaimers,” not “No Action Alternative.”**

“For details about the No Action Alternative, refer to the 1995 resource management plans for the districts of Salem, Eugene, Coos Bay, Roseburg, and Medford, and the Klamath Falls Resource Area of the Lakeview District, as amended.” (Page 65)

“The No Action Alternative, as analyzed in this environmental impact statement, includes

Survey and Manage standards and guidelines consistent with the January 2001. Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines in Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl, but does not include the March 2004. Record of Decision to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines in Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl or the March 2004. Record of Decision. Amending Resource Management Plans for Seven Bureau of Land Management Districts and Land and Resource Management Plans for Nineteen National Forests Within the Range of the Northern Spotted Owl. Decision to Clarify Provisions Relating to the Aquatic Conservation Strategy. The two March 2004 Records of Decision have been the subject to litigation, and their implementation is uncertain at this time." (Page 65)

A "No Action Alternative" is supposed to be just that, which is what page 29 says. Most people, including myself, would be likely skip over this section if they weren't planning on reading the entire 1600 pages simply because they would assume a No Action Alternative would mean things would stay the same. Wrong! Here is where BLM slipped in a huge disclaimer.

"Implementation of these two plan amendments would change the effects of the No Action Alternative from the effects analyzed in this environmental impact statement. However, the effects of such a changed No Action Alternative would still be within the range of effects analyzed in this environmental impact statement. That is, these amendments to the No Action alternative would change the effects of the No Action Alternative to be more similar to the action alternatives. For example, an amendment that would remove the Survey and Manage standards and guidelines from the No Action Alternative would result in effects more like the action alternatives, all of which do not include the Survey and Manage standards and guidelines. Plan maintenance for the 1995 resource management plans is documented in the district annual program summary and monitoring reports that were published from 1996 through 2005. These district annual program summary and monitoring reports are incorporated by reference. See Map 2 (Land use allocations under the No Action Alternative) that follows this discussion. Also see the map packet (Maps 1, 5, and 9) for detailed views of the land use allocations. (Page 65)

Up to this point the reader has mistakenly been led to believe that the so-called "No Action Alternative" means just that, and that nothing would change from what existing laws require. Now we're told the "No Action Alternative" isn't a No Action Alternative at all, but rather an "Action Alternative" that BLM is calling a "No Action Alternative!" BLM is now disclaiming the earlier "No Action Alternative" but not changing the name. Wow!

We're also told that the "No Action Alternative" eliminates virtually all significant restrictions on cutting down the last remaining forests. **BLM, through the creation of four action alternatives only, is trying to close the door on any possible alternative that could prevent liquidation of Oregon's last remaining forests.**

How can the WOPR “No Action Alternative,” that would increase timber yields, be a No Action Alternative? All WOPR proposed alternatives, including the so-called “No Action Alternative,” would increasingly destroy habitats and the species that depend on them. All WOPR

Alternatives would cause more of the species that created and sustained Oregon’s forest ecosystems to go extinct; no longer would they be available to restore forests, and humans can’t do it. **Converting the last remaining natural forests into tree stands would cause the worst irrevocable forest ecosystem catastrophe in Oregon’s history.**

All WOPR alternatives would cause more of the species that created and sustained Oregon’s forest ecosystems to go extinct; no longer would they be available to restore forests, and humans can’t do it.

### **Sustainable Relationships**

When forest management practices cause species to become less functional, forests become less productive, and we become less able to meet our needs. Human survival requires mutually beneficial human-forest relationships. If humans want to be around for hundreds more years, we have to restore relationships that retain the biosphere species that sustain us. **A credible EIS would evaluate the effects of species extinction on forest ecosystems and human health.**

If humans want to be around for another hundred years or so, we have to restore relationships that retain biosphere species that sustains us.

Humans can’t perform essential functions that forest species do, and we can’t manage forests sustainably, we must let other species perform their own unique functions. We don’t know how to sustainably manage the thousands of species that create and sustain forests. Our survival, depends on whether or not we retain the peculiar ecosystem subsets we live in so that they remain compatible with our peculiar traits and functions. Sustainable forest practices require relationships that retain forest species, their peculiar functions, and their peculiar environments. **The Natural Selection Alternative (NSA) provides a plan for achieving sustainable relationships; the WOPR DEIS ignores it, and develops Alternatives that won’t.**

Sustainable forest practices require relationships that retain forest species, their peculiar functions, and their peculiar environments.

### **Environment**

The environment is the aggregate of external circumstances, conditions, and things that affect the existence and development of life. Species, including humans, have adapted their genes to peculiar environments, and they depend on it for their survival. Anyone not concerned about their environment is neglecting their needs, their family’s well being, and human survival. **A credible EIS would evaluate the adverse impacts of proposed action alternatives on forest species, their functions, their environments, our communities, and human survival.**

Anyone not concerned about their environment is neglecting their needs, their family’s well being, and human survival.

## WOPR Plan Credentials

### Assessments

Humans must retain environments within the range of variability that will sustain forest species, and ourselves. The DEIS doesn't define forest ecosystem biological or ecological health, and it fails to evaluate it.

We don't find the DEIS to be a credible forest ecosystem, environment, or community impact assessment. **We assert that the WOPR planners, who accept the tree stand definition of forest land as the definition of a forest, are not qualified to write the Western Oregon Forest Ecosystem Plan, or DEIS.**

I don't find the DEIS to be a credible forest ecosystem, environment, or community impact assessment.

## Giant Political Advertisement

### The great tree stand advertisement

The WOPR Team created one of the most convoluted tree stand based EIS advertisements we've seen for generating public consent to timber sales and paying for managing public forests as tree stands. We think few people will be knowledgeable enough about forest ecosystems to keep from being trapped into unknowingly accepting

WOPR's tree stand framed management terminology and agendas. We object to paying for timber sales, paying for cutting down Oregon's last remaining islands of old forests, and paying for converting forests into tree stands. **The DEIS fails to evaluate tree stand management impacts on forest ecosystems, and like most other advertisements deceptive information is being used to generate public consent.**

WOPR Newsletters, and the DEIS, are taxpayer paid advertisements designed to generate public consent for converting Oregon's last remaining old forests into young tree stands.

### "Fire and Fuels" (WOPR Newsletter 7, Page LXII)

"The analysis of fire and fuels divides the planning area into two areas:

- the Salem, Eugene, Roseburg, and Coos Bay districts (north of Grants Pass), which generally have a low-frequency and high-severity fire regime; and
- the Medford District and Klamath Falls Resource Area of the Lakeview District (south of Grants Pass), which generally have a high-frequency and low-severity fire regime."

I am familiar with the Medford District fire situation, having been on the local district volunteer fire department for 15 years beginning in 1967, and being on many large forest fires in this area, I am particularly concerned about the incredulous strategies being proposed for dealing with forest fire issues.

"Fire severity, hazard, and resiliency can generally be equated to broad descriptions of vegetation conditions. Under moderate and extreme conditions, the primary source of high-severity fire would be in stand establishment and young forests that consist of even-aged stands."

These tree stand plantations have been a major threat to the most resilient forests. I've witnessed time and time again where young tree plantations have burned up old growth forests that most likely would not have burned if the natural forest was still standing.

**"All four alternatives would reduce fire severity and hazards north of Grants Pass, because all four alternatives would reduce the combined abundance of stand establishment and young forests. The No Action Alternative and Alternative 1 would result in the largest decrease and Alternative 2 would result in the smallest decrease."**

If "Alternative 2 would result in the smallest decrease" it means the natural old highest resilient forest likely isn't being retained. If its not being retained, neither is productivity or sustained yield. Why then is it a Preferred Alternative?

**"All four alternatives would reduce fire severity and hazard in the Medford District, but the amount of decrease would vary widely among the alternatives. The amount of decrease is relative to the reduction in acreage of stand establishment and young forests compared to the current condition."**

Sustainable forest management practices would not reduce the acreage of trees, or the forest that surrounds these trees. This indicates a lot of clearcutting would be done under such names as "selection" or "regenerative" cuts. The NSA would increase the amount of acreage with trees, not reduce it. This indicates an incredulous WOPR assessment of forest and fire conditions.

**"The No Action Alternative would result in the most decrease and Alternative 2 would have the least decrease."**

Most fire fighters know that quick response is the best way of preventing small fires from becoming major catastrophes. The NSA has permanent resource trustees assigned to large blocks of land with fire fighting equipment. The NSA has far the best approach for keeping small fires from becoming catastrophic ones.

**"In both the Medford District and Klamath Falls Resource Area, the No Action Alternative and Alternative 3 would increase the acreage of fire-resilient forests from current conditions, because they would create forests with structural legacies."**

Three things are essential to forest fires: 1)fuel, 2)oxygen, and 3) heat. Young tree plantations have highest fuel hazards, oxygen availability, and heat. There is also less moisture. Old natural forests have lowest fuel, oxygen and heat conditions.

Oldest forests with closed canopies have the most fire-resilient forests. How can anyone "create forests with structural legacies" that "would increase the acreage of fire-resilient forests from current conditions" without eliminating the forest around the trees? It sounds like the forest will be eliminated from around a few trees. If that is true, we know that these conditions soon cause less resilient forests.

It seems the same kinds of forest management strategies that caused our high forest fuel and fire

hazards would now be mistakenly relied on more than ever to get us out of this mess. **No credible EIS would create Alternatives that cause high fuel and fire hazards, but the WOPR DEIS does. Why?**

## **Consequences of Converting Forests to Tree Stands**

### **Extinctions**

Converting forest ecosystems into tree stands changes the environment. Environments that species rely on for their survival, are destroyed. The species that do survive are forced to relocate in other generally less compatible environments, if there are any

left. Forest species risks of extinction increase and so do ours. Species extinction means forests cannot be restored because the species that created and sustained them are no longer available to restore them. **The WOPR DEIS omits analysis of the adverse impacts of converting natural forests into tree stands. Why?**

Species extinction means forests cannot be restored because the species that created and sustained them are no longer available to restore them.

Forests could not be restored because the species that created and sustained them would be extinct. Tree stands would fail because the species that sustain them would be extinct.

The WOPR forest plan would likely cause the worst forest ecosystem catastrophe in Oregon's history. **The DEIS omits analysis of the worst adverse impacts of alternative options on Oregon's forests and humans. Why?**

The WOPR forest plan would cause the worst forest ecosystem catastrophe in Oregon's history.

## **"The Natural Selection Alternative" (NSA)**

### **DEIS "Introduction" (Page 3)**

"The BLM is proposing to revise existing plans to replace the Northwest Forest Plan land use allocations and management direction because

1. the BLM's plan evaluations found harvest levels have not been achieving the timber harvest levels directed by existing plans, and the BLM now has more detailed and accurate information than was available in 1995 on the effects of sustained yield management on other resources.
2. there is an opportunity to coordinate the BLM management plans with new recovery plans and re-designations of critical habitat currently under development and
3. the BLM has re-focused the goal for management of the BLM-administered lands to the objectives of its statutory mandate to utilize the principles of sustained yield management on the timber lands covered under the O&C Act of contributing to the economic stability of local communities and industries, and other benefits from such management to watersheds, stream flows, and recreation." (Page 3)

BLM's "harvest levels have not been achieving the timber harvest levels" the timber industry wants, which far exceeds what Oregon's forests have been capable of yielding under "sustained yield" principles. **WOPR Alternatives would increase timber production which would further conflict with sustained yield.**

The statement: "BLM now has more detailed and accurate information than was available in 1995," is an argument serving timber extraction interests, not sustained yield interests which have not changed. When the forests cut down have been restored to natural old forest environments and species, which will take at least as long as the trees were old, then we might consider extraction in the last remaining natural forested islands. But, forest restoration occurs only when everything goes according to plan which it rarely if ever has. The truth is, no one has ever restored one of these cut down forests, and no one knows how to, an obvious reason why all WOPR proposed Alternatives would cause irrevocable catastrophes for Oregon forests.

The truth is, no one has ever restored one of these cut down forests, and no one knows how to, an obvious reason why all WOPR proposed Alternatives would cause irrevocable catastrophes for Oregon forests.

All sustainable forest management plans must demonstrate how they will retain all of the species that create and sustain forests, but none have. Proposing to cut the last remaining islands of natural old forests before any cut down forest has been restored to original species conditions, demonstrates that WOPR does not have a sustained yield management plan.

Proposing to cut the last remaining islands of natural old forests before any cut down forest has been restored to original species conditions, demonstrates that WOPR does not have a sustained yield management plan.

BLM says "there is an opportunity to coordinate the BLM management plans with new recovery plans." But, WOPR's so-called "new recovery plans" are the same as the old ones except more aggressive. True recovery plans would restore natural old forests with all of the species that created and sustained them, none of WOPR's Alternatives would. The NSA is truly a "new recovery plan." The NSA recognizes and would retain all forest ecosystems, including for example the most important wildlife habitat in our area, Critical Habitat OR-72 in the Deer Creek watershed, that would be eliminated under the WOPR.

Forest tree stand perspectives, assumptions and conclusions make neither WOPR Alternatives, nor it's DEIS, support BLM's recovery claims. Referencing other incredulous tree stand based documents, omitting important relevant information, constant misleading information, and often outright lies, makes the WOPR incredulous. Assuming that forests are tree

Assuming that forests are tree stands is incredulous, but assuming that there is any such thing as tree stand "sustained yield management" is even more incredulous.