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2008-01-11

Bureau of Land Management
Western Oregon Plan Revision Office
P.O. Box 2965
Portland, OR 97208

Re: Comments to the Draft Western Oregon Plan Revision

Please accept the following as my official comments to the Draft Western Oregon Plan Revision. They are timely. I incorporate by reference the comments submitted by the Oregon Chapter of the Sierra Club, the Natural Trails & Waters Coalition, Klamath Siskiyou Wildlands Center, Siskiyou Regional Education Project, and Deer Creek Valley Natural Resources Conservation Association.

WOPR, apparently a popular acronym, strikes an unfortunate parallel in 1983's movie, *War Games*. WOPR (pronounced "Whopper") is an acronym for **War Operation Plan Response**, Stephen Falken and John McKittrick's fictional military computer featured in the movie and novel *WarGames*. WOPR is a form of artificial intelligence, programmed to play numerous strategy and war games, including one called *Global Thermonuclear War*, the purpose being to enable itself to optimally respond to any possible enemy nuclear attack.

In *War Games*, David Lightman (Matthew Broderick), a teenage computer hacker unwittingly makes contact with WOPR. He hacks into WOPR, finds a list of games and gives the command to play the Global Thermonuclear War scenario. In the process, WOPR begins running the simulation on the main screen at NORAD, making the staff there think the Soviet Union is readying their missiles for a first strike. Characters are only able to persuade WOPR to stop when they trick it into playing tic-tac-toe against itself, which almost instantly creates a long string of stalemates. The learned concept of futility in an unwinnable game extends to WOPR running through all the possible scenarios of nuclear war, which all end in stalemates (mutual assured destruction) as well. In the face of this data, WOPR concludes that nuclear war is a pointless exercise and stands down, stating:

"A strange game. The only winning move is not to play."

The analogy may have to be explained to those who threw together the Western Oregon Plan Revision. Many of us have been asking BLM to revise their RMP as dictated in the Northwest Forest Plan, but to no avail. It takes a legal action contrived by the Bush Administration to get the remaining northwest timber for its timber industry backers. It is a strange game we play with BLM and the corporate bureaucrats. WOPR, a ten-pound, three volume, 1600+ page paper monster, is padded with ignorant conclusions

using inadequate and bad science designed to replace the Northwest Forest Plan (NFP). Like the playground bully, when BLM management can't win the game, it changes the rules. This Draft WOPR insults the American public, violates their trust and shows BLM's total disrespect for the property and home owners adjacent to and near these checkerboard BLM/O&C lands.

“Greed, political influence, shortsightedness and fear mongering are on the agenda for the Bureau of Land Management in Oregon. Big timber wants the last surviving stands of Oregon old growth and the bureaucratic systems that are supposed to manage our resources are stonewalling public opinion while our biodiversity circles the drain.” Doug Heiken

I choose not to play this dangerous game presented by the BLM's WOPR. The WOPR is a no-win proposition. The no action alternative isn't. I reject the WOPR and all of its alternatives. I vote to stay with the NFP. The courts will prove this out. WOPR is rejected because:

1. There is no wide range of alternatives is offered. The environmental analysis fails to adequately consider a range of alternatives. The National Environmental Policy Act requires that the BLM study, develop and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources. ^{(42 U.S.C. 4332(E))}
2. There is no true “No Action Alternative” offered.
3. WOPR will not generate taxes for counties. Property values will decline up to 20% because of BLM's proposed “intensive management” and OHV Emphasis Areas.

“Natural areas can increase property value by an amount of about 5% for properties within view of forested landscapes and 6% for homes within a short proximity of the logged lands (Tyrvaainen and Miettinen, 2000; Garrod and Willis, 1992a; 1992b). Some estimates for the influence of natural areas on the value of nearby property go as high as 20% including areas where the forest interfaces with suburban neighborhoods (Crompton, 2001; 2007 Lutzenhiser and Netusil, 2000; Hammer, Coughlin and Horn, 1979; Moore, Stevens and Allen, 1988). Properties adjacent to naturalistic parks and open spaces are typically valued at about 8 to 20 percent more than comparable properties (Crompton, 2001). Other estimates place the increase of value for properties abutting a forested area at 3 – 7% higher for a home and 20 – 35% for a vacant lot (Thorsnes, 20020). Properties with wooded areas compete better for buyer attention and generally sell quicker than land without trees (Seila and Anderson, 1982).” Roger Brandt; 2007)

As for OHV Emphasis Areas, SCORP, found at:
http://egov.oregon.gov/OPRD/PLANS/scorp_review.shtml, is updated by State Parks

every 5 years and includes data on recreation “demand” for 2002 and projections of demand through 2007. Our area, region 5, shows on Table 2.5 that we have the second highest amount (or “supply”) of Unpaved Backcountry Roads (at 13,918 miles!) of the state’s 11 regions. Table 3.5, shows that residents in Region 5 who participated in “quiet” trail-based recreation (hiking, equestrian, backpacking and biking) comprise almost 40 percent of the population whereas only about 24 percent participated in OHV recreation (ATV riding, dune buggy, 4WD driving and motorcycling). Table 3.9, shows a “Relative Needs Priority Index” (or demand). For Region 5, there was no existing (2002) unmet demand listed for OHV recreation. Table 3.10, shows “Relative Needs Priority Index – 5 year Projections” (that is, for 2007). For Region 5, again shows no projected unmet demand for OHV recreation. Most remarkably, Table 4.15 (page 4-24) shows the following trends in outdoor recreation from 1987 to 2002 for Region 5 and 8 (Klamath County) combined:

a. Participation in day hiking and backpacking increased significantly (a percent change of 40% and 168%, respectively) and horseback riding increased by a respectable 7% and nature/wildlife observation increased a whopping 226%; whereas

b. Participation in OHV activities (with the exception of snowmobiling, which increased a remarkable 1,733 %?!) all showed a significant decrease in participation with the percent change for four-wheel driving (-46%), ATV riding (-20%) and motorcycling (-30%). The decrease in ATV participation for these regions buck a trend of strong (positive) growth in ATV-related recreation elsewhere in the state.

These latter statistics demonstrate that non-motorized activities are far more popular in your region than are motorized recreational activities and that the trends of rapidly declining participation in (summer-time) OHV activities throws into serious question the BLM’s proposal to designate OHV Emphasis Areas in Region 5.

Page 88 of the 1995 BLM Resource Management Plan for the Medford District is about the Rural Interface Areas. We are aware that the WOPR is technically a revision to the 1995 RMP and the BLM can toss out (or enhance) concepts like the Rural Interface Areas each time it revises its plan. And apparently case law has indicated that BLM doesn’t have to legally implement concepts in its RMP, something difficult for the public to grasp. Nonetheless, the BLM in its decision to reverse a concept (Rural Interface Areas) that recognizes the potential for BLM management actions to adversely affect residents, particularly as it relates to OHV use is arbitrary and shows the ultimate disrespect to landowners adjacent to and near O&C lands. This is a violation of the O&C Act.

Even concepts in the current Administration’s revised Land Use Planning Handbook have largely been ignored by BLM planning teams, what the public sees as a breach of public trust.

4. There is no criteria for BLM’s decision to designate the proposed OHV Emphasis Area which violates Executive Order No. 11644 (1972 as amended by Executive Order

No. 11989 (1977) and 43 C.F.R. § 8342.1 requires the BLM to ensure that ORV areas and trails are located:

- To minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness and suitability;
- To minimize harassment of wildlife or significant disruption of wildlife habitats, and especially for protection of endangered or threatened species and their habitats;
- To minimize conflicts between ORV use and other existing or proposed recreational uses of the same or neighboring public lands and to ensure compatibility with populated areas, taking into account noise and other factors; and
- Outside officially designated wilderness areas or primitive areas and in natural areas only if BLM determines that ORV use will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established.

5. WOPR pulls BLM forests (checkerboard amongst homes and private property) in major basin areas out of scientific framework of the Northwest Forest Plan and violates the public trust when lands were purchased adjacent and near BLM lands at top value.

6. WOPR violates previous agreements and BLM decisions on prior projects for fire protection and thinning stewardship and moves those lands into clearcut/intensive management and OHV-advertised use. BLM does not have, nor will it get money to successfully monitor and police any new OHV designated areas. BLM must present its Planning Criteria which accurately reflects the requirements of 43 C.F.R. § 8342.1. BLM does not have accurate records regarding what routes existed on these lands. It should update those inventories of 1995 before it does anything. The WOPR must include criteria that assesses the appropriateness of establishing OHV play areas. Among those criteria must be the amount of intermingled or adjacent private lands and residences. There are higher priority issues such as the condition of public land resources, health of wildlife habitat and protected species, and avoidance of conflicts with other (non-motorized) recreational uses. BLM's assumption that the current trend in recreational demand will remain constant throughout the next decade is not supported by BLM's ill-chosen statistics on all-terrain vehicles. The motivation to manage BLM lands with a primary recreational focus on meeting perceived OHV demand pales in comparison to what appears to be a much greater need to focus on the provision of non-motorized trail opportunities.

7. WOPR does not state criteria for OHV decisions. It does not define roads and trails. Wildlife and other quantitative thresholds for important variables such as noise, soil loss, and sedimentation, must be documented and used to determine environmental impact and, in turn, appropriate road and trail densities throughout the planning area.

8. It violates the O&C Act. The outcome would be inconsistent with the Oregon & California Lands Act (O&C Act) and other laws. The plan to virtually clearcut the O&C lands is NOT sustainability. The 1937 O&C Act didn't not have ATV, dirt bikes, quads and such to contend with, therefore this whole OHV Proposed Emphasis Area is outside the scope of the Act. "(Nonmotorized forms of recreation would be dissuaded from using these areas." So what about the people living adjacent or nearby?

9. It violates Clean Air and Clean Water Acts. How is BLM assuring that domestic water for the homes adjacent to the proposed treatment areas stay clean and safe?

10. It is not sustainable as per O&C Act and FLPMA.

11. Local economies and quality of life are ignored. The BLM knows that this plan WILL NOT improve the local economies. This violates the O&C Act

12. WOPR does not show methodologies for intensive management.

13. It violates the Aquatic Conservation Strategy by reducing riparian buffers to nil.

14. It violates the Endangered Species Act. This plan will "yield" 40% reduction in marbled murrelet nesting habitat and spotted owl dispersal habitat after 100 years. The BLM should consider all factors that affect spotted owl viability in the transition zone between the Coast Range, the Cascades Range and the Klamath Province. The NFP FSEIS and the RMP FEIS deferred to project-level cumulative effects analysis for this information. BLM does not know enough about Fishers and is not willing to survey for them in the likely occupied areas. We demand BLM to actively survey for the Pacific Fisher in the Project areas.

We find it interesting that the BLM believes the owls are recovering "overall". Could it be that the timber sales in litigation and the inability of BLM to log has helped the owls?

15. It will dramatically increase fire hazard in communities. BLM does not have a plan, nor the money to continually treat clearcut lands to reduce the fire hazard around private lands and homes. Communities threatened by fire. Logging will convert fire-resilient old forests into dense young forests that are prone to high severity fire.

16. It will cut remaining low elevation Old Growth Legacy trees, contrary to Nation public opinion. There will be a seven-fold increase in old-growth clearcutting. 58,000 acres of old-growth will be clearcut in the first ten years. There will be fewer, smaller old-growth reserves. Reserves are 48% smaller than the minimum needed for legal compliance and recovery of threatened species. Please explain how the BLM determined that the logging of a significant number of old growth trees is not a significant federal action.

17. It reduces retention to two trees per acre, creating a moonscape to match nearby clearcut corporate timber lands. Most of the sections in the Anderson West Project are

“islands” surrounded by private and industrial lands that have suffered degradation by over-cutting or clearcutting.

Indeed, the Medford BLM has a long embedded habit of targeting large, fire resistant trees in its landscape projects. It is wrong to characterize these timber harvest projects as authentic fuels reduction and represent “volume grab” as necessary for forest health. The failure to incorporate community concerns and focus fuels reduction around homes, in tree farms and in the understory is truly egregious.

It does not need to be that way. BLM could provide alternatives more consistent with a true forest health prescription such as Natural Selection. On-the-ground, there is a stark contrast between forest health choices with a focus on what is left, and Anderson West that focuses on what will be taken. An alternative based on forest health authentically helps the community by providing jobs and wood locally, instead of shipping them off to large industrial operators. Where is BLM’s business plan for our Illinois Valley and particularly Selma Community? It is apparent that placing one BLM mission as a priority above all others is business as usual, but actively doing harm to the physical environment, economic potential and viability of local businesses maybe a new low.

19. It cuts remaining Old Growth Legacy trees. There is volume to be had in the watershed that would not extirpate LSOG associates or be as controversial as the LSOG units you are proposing.

20. BLM states capriciously that its management alternatives will not likely influence the physical setting characteristics of recreation facilities. This virtual “clear-cut” of all BLM lands at the basin level, including the last stands of Old Growth Legacy trees in the watersheds underplays the obvious adverse effect and cumulative effects that intensive management will have on BLM’s ability to provide and maintain quality recreational opportunities. BLM must state any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.

21. WOPR ignores the best science available on biodiversity, sustainability, fire behavior and global warming.

22. It will adversely affect fish populations. More clearcutting and roads will make it harder to fix 600 miles of already polluted streams on BLM land. There will be dramatic reduction in protection for streams. Stream buffers will be reduced by 75%. Small streams get only one small tree every 175 feet along streams. Unchanneled valleys (swales) should be identified as potentially unstable areas and marked for riparian protection. These areas experience overland flow during winter months and are susceptible to surface erosion, slumping, and gullyng. Swales and unchanneled valleys are found immediately upstream and adjacent to class 4 channels. Failure to protect unchanneled valleys and swales from logging is likely to result in erosion and destruction of hyporheic areas.

Due to the lack of detailed, site-specific analysis of soil and hydrologic resources, the BLM cannot credibly conclude that WOPR would meet Aquatic Conservation Strategy (ACS) objectives.

Several riparian habitat features were found to be in an impaired condition. The BLM's proposal would add insult to injury and not maintain the water quality in Deer, Anderson and Squaw Creeks. There's no reliable sediment monitoring data for any of these creeks. However, we do know that road density in that sub-watershed is huge, especially after the Biscuit Fire.

Logging, construction of new roads, skid trails and landings would displace and/or expose soil and potentially add non-point sediment pollution to Squaw, Clear, Anderson and Deer Creeks. BLM must disclose the current condition of riparian reserves in the project area and their ability to filter sediment.

Logging and road building can trigger sediment and turbidity problems even when these activities take place outside of Riparian Reserves (USDC 1997). The distance that sediment can travel from the point of disturbance depends on the type of management activity and the condition of the reserves (Ketcheson & Megahan 1996). Concentrated sources of sediment, such as road cross-drains, can produce large volumes of sediment that have the potential to reach streams regardless of how far upslope they are (NMFS 1997). Sediment travels farther through Riparian Reserves that are degraded by logging and/or road building than undisturbed reserves because roads and ditches form pathways for sediment to travel downslope that do not exist in undisturbed reserves (Chamberlin et al. 1991).

Undisturbed Riparian Reserves would not necessarily buffer streams from soil erosion and sediment delivery. Even if there were no timber cutting inside reserves, the BLM never analyzed the existing condition of reserves and private land hydrologic conditions. Many reserves and stream courses on private land are degraded from past disturbances.

The EA even demonstrates that riparian conditions are poor and admits there will be increased sedimentation - so how does the BLM plan to meet the ACS or protect domestic water?

In watersheds subjected to roading and clearcut logging, changes in the drainage network, soil compaction, less interception of precipitation by vegetation, and reduced evapotranspiration by trees can significantly increase soil moisture and water yield (Chamberlin et al. 1991, Hicks et al. 1991, Satterlund and Adams 1992). Accelerated drainage from highly roaded and logged watersheds may increase the volume and frequency of peak stream flows, and may also alter the volume of base flows (USDC 1997). Altered flows can degrade stream channel morphology and aquatic habitat.

WOPR will directly increase open road density, remove most/all canopy and increase soil compaction. When combined with extensive logging and road building in the past, the planned activities likely will trigger increases in peak stream flows.

In portions of the planning area with a rain-dominated hydrologic regime, logging activities would increase soil moisture and enable more precipitation to become available

as surface runoff (Keppler et al. 1990). Roads interact positively with clear-cutting to modify water flow paths and speed delivery of water to channels during storm events, producing much greater changes in peak discharges than either clear-cutting or roads alone (Jones and Grant 1996). WOPR will have a significant impact on the hydrologic system and associated species in the Deer Creek Watershed.

23. BLM has yet to reveal methodologies for its results on cumulative impacts, disturbance/erosion, compaction, soil disturbance, sediment due to skid roads, haul roads and landings, fire hazard, etc. The BLM needs to demonstrate there will be prevention of cumulative soil disturbance in the project area. We would like to see a site-specific analysis. Tractor logging systems are known to impact soils. The WOPR lacks information about site-specific soil compositions and management history in each cutting unit. Generic approaches to soil management lead to uninformed decision-making and can create problems for site productivity and hydrologic function. Specific soil types and topographic positioning demand different management and mitigation practices.

Tractor logging is generally unacceptable as it exposes soil, causes compaction and loss of soil at the site. Soil disturbance caused by logging activities triggers erosion that adversely impacts both soil and water resources. The existing level of soil disturbance has not been measured and disclosed so the BLM cannot say with any factual basis whether RMP standards will be met. Existing soil impacts must be measured and future impacts estimated so that a cumulative impact analysis can be prepared and included in this project. Monitoring data fails to distinguish between detrimental compaction caused by recent logging activities from the cumulative effects of past management.

24. The effects of past actions in the project area, the currently projects in planning/scoping/implementing/held up in litigation seven projects for the Illinois Valley and the many BLM projects being planned must be described in detail for the decision-maker and the public to fully understand the cumulative impacts of the WOPR. The Deer Creek Watershed is a "marginal watershed" to begin with. The production of both optimum quality and quantities of water is the reflection of "good watershed conditions." But the Deer Creek Watershed does not reflect those conditions, and WOPR clearcuts and OHV Emphasis areas will worsen the watershed's overall health and that of the Illinois Valley.

Extensive logging and numerous roads built in the watershed adversely effect both its wintertime and summertime water production and characteristics. Additionally, past timber management, including salvage activities has decreased large woody debris recruitment and the ability of any areas in the watershed to develop late-successional forest structure. The BLM must weigh the cumulative impact of WOPR's degradation of late- and mid-successional forest habitat (especially snag removal) in light of past actions. There are few references to cumulative impacts of areas adjacent to the project area, nor of the cumulative impacts of the action.

The key to understanding cumulative impacts is finding the right set of key resources to analyze. The NFP's Aquatic Conservation Strategy intends to protect and restore riparian

and aquatic resources, so in that context, the mandate is to consider (when making decisions about individual actions): 1) how all things together affect species population viability and the limiting factors of aquatic habitat productivity such as large pool formation and maintenance, clean gravel interstices or over wintering habitat; 2) how all things together affect water quality including temperature, sedimentation, turbidity, nutrients, and pH; 3) how all things together affect peak flows, percent of cobble imbeddedness, large woody debris recruitment, large pool habitat, and so on. The BLM has not analyzed these important considerations in the WOPR DEIS.

In a more general sense, the BLM has failed to convey an understanding of cumulative impacts because their perspective on environmental consequences is too narrow and limiting both in terms of natural processes and geographic scope. Scientists such as Reid (1993) note that many past cumulative impact analyses have failed because they focus on too small an area for important processes to be recognized. In "Cumulative Effects of Forest Practices in Oregon" Robert Besechta et al. (1995) reviewed nine different methodologies for analyzing cumulative impacts, many of which are used on federal lands in the Pacific Northwest, and concluded behaviors such as change in peak flow were expected to occur.

Unfortunately, there is often insufficient data available to support limitations on the amount of basin harvesting that occur at any one time nor is there good evidence or an agreed upon procedure for determining what the magnitude of those limitations or thresholds should be. Other problems of current cumulative impacts methodologies are their general emphasis on peak flows as the driving force behind downstream channel changes. Many of the earlier developed procedures did not consider the effects from sedimentation, woody debris management, or riparian management. In addition, there is very little allowance made in many methods for natural variability amongst basins. Finally, many cumulative impacts methods fail to identify monitoring needs that will confirm whether cumulative impacts goals are being attained. ...

Traditional cumulative impacts assessment is problematic because of hydrological functioning and responses associated with forest practices. In most cases, the approach has been to determine those areas most at risk and then attempt to manage them by reducing or minimizing potentially adverse hydrological effects, while concurrently applying standard forest practices to other "non-risk" areas. Thus, only those areas of a watershed that appear to be at risk of catastrophic changes are likely to receive special management consideration. Gradual or chronic changes in watershed functioning or condition for the remaining watershed are largely ignored.

In a May 13, 1996, Position Paper on the Oregon Forest Practices Act, NFMS points out that:

Cumulative effects of forest practices may include changes in sediment, temperature, and hydrological regimes, resulting in direct, indirect or eventual loss of key habitat components (e.g., clean gravel interstices, large woody debris, low temperature holding pools, and protected off-channel rearing areas) necessary for spawning and

rearing of anadromous salmonids. These changes often are not expressed "immediately" at the project site, but instead may occur subsequent to triggering events (fire, floods, storms) or are manifested off-site (downstream) of where the effects are initiated.

The prevention of potentially adverse impacts at the project site is indeed necessary, but not sufficient to avoid cumulative effects (CEQ 1971). As Reid (1993) states: "The BMP approach is based on the premise that if on-site effects of a project are held to an acceptable level, then the project is acceptable, regardless of activities going on around it. Interactions between projects are beyond the scope of BMP analysis, and operational controls are applied only to individual projects."

While the BLM says the project has minimal effects of individual actions, it still does not address the cumulative impacts of multiple actions occurring in the watershed. The proposed actions may still be significant, in their totality, and have undesirable consequences for beneficial uses such as salmon populations and salmon habitat. ...

Besechta et al. (1995) also identified several conditions precedent for accurate analysis of cumulative watershed effects, including: 1) accurate understandings of natural variation in environment; 2) reliable baseline information at the local and regional scale (ideally from "reference" sites); 3) accurate assessments of the probable effects on key resources of past, present and foreseeable future activities; 4) development of reliable models that relate resource conditions within a dynamic spatial framework; and 5) establishment of levels of acceptable change in the environment.

BLM has continually thrown caution to the wind in the face of scientific uncertainty.

25. The assumption by BLM that "there would be no adverse effects to soils in riparian reserves," when there will be tree removal in the RR's.

26. The Deer Creek Watershed Analysis is now nine years old, never been updated, and still contains the inadequacies protested in the Deer Mom Timber Sale, Anderson West Project and South Deer Project.

27. The potential damage to areas where medicinal mushrooms exist in the sales was also discussed. The Department of Defense has awarded grants to the study of medicinal mushrooms, which have the capacity to cure cancers and other diseases. These mushrooms are indeed found within the sale areas, but BLM is not required to survey for them.

28. There is barely any mention of the fire hazard danger BLM was pressing on the public. Why has this emphasis now changed? Has the fire danger lessened? Broadly, we agree with the BLM that there is an urgent need in many low-elevation fire suppressed plantations for the reduction of fuels. This need is the greatest near homes and most effectively carried out in the form of small diameter treatments and brush reduction around residences. This should be mentioned in the WOPR. Apparently BLM's

“concern” for the public’s safety as it related to fire hazard has changed to potential destruction of private lands due to the catastrophic fire hazard BLM will create with massive clearcuts and the ensuing brush grow-back. Throw in a bunch of OHV’s, no security policing and potentially abusive OHV riders and you have the greatest fire hazard imaginable.

29. This 1600 + page document wastes an enormous amount of paper on “prize-winning” and very expensive obfuscation. The BLM defends the WOPR, pits conservationists against OHV organizations, violates the public trust and opening seeks to polarize interested parties.

Tic Tac Toe, anyone? Not me, thank you. **Dump the WOPR. Keep the Northwest Forest Plan and abide by its rules.**

Sincerely,

Elaine Wood

Cc: Representative DeFazio

Senator Wyden

Senator Smith

Josephine County Commissioners