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Greetings:

As a botanist subcontractor who surveys for rare plants, lichens, and bryophytes on BLM lands in southwest Oregon, I am deeply concerned about the proposed Western Oregon Plan Revision (WOPR). Although the size of the documents makes it difficult for a citizen such as me to conduct a thorough review, I will respond to several of the problems with this plan. Certainly a deeper analysis would find many other reasons why this plan is unacceptable. On some issues such as the effects of the WOPR on wildlife, I will defer to my colleagues who have submitted specific critiques within their areas of expertise.

Southwest Oregon is the most botanically diverse area of North America west of the Mississippi river. Here where many mountain ranges and ecosystems come together, we have plant communities and habitats that are found nowhere else in the world. These places draw plant enthusiasts from around the world and serve as living laboratories for students who regularly come from as far as Seattle to study our unique ecosystems.

It is almost unbelievable that in this day in age anyone could think that causing rare plants and wildlife to become extinct or extirpated from their historical ranges could be considered as a forest management strategy—yet this is what the WOPR proposes.

According to the Draft Environmental Impact Statement, “conservation measures would not be applied to populations of [bureau assessment status or bureau sensitive status rare plant] species in the conifer habitat group that occur within the O&C harvest land base unless 20 or fewer populations of a species are known to exist” (quoted from the Botany section of ch. 4, Environmental Consequences, WOPR DEIS). From a scientific perspective, this plan makes no sense; allowing a plant to decrease to 20 populations is like asking for extinction. It would inevitably allow the loss of interspecies genetic diversity that is necessary for a plant population to be resilient.

All proposed action alternatives propose eliminating Late Successional Reserves, but it is not apparent that the effects that such changes will have on rare organisms have been thoroughly analyzed. Many of our rare organisms are dependent on old-growth forests and will likely

experience significant population declines as these forests are fragmented and destroyed. Lichens such as *Chaenotheca furfuracea*, *Chaenotheca ferruginea*, *Nephroma occultum*, *Pseudocyphellaria rainerensis*, and *Usnea longissima* are known to be old-growth obligates. Certainly many of our rare vascular plants would suffer similarly from the elimination of the LSRs; these issues will be addressed in more detail in letters submitted by my colleagues. It is clear that the WOPR could cause widespread extirpation or extinction of a great many organisms.

Noxious weeds are already widespread on BLM land and all three proposed alternatives would only make their dispersion worse, according to the DEIS. Noxious weeds compete with rare plants, so their distribution through the execution of the WOPR would be another nail in the coffin of many of our rare species. Proposed clearcuts would turn our lands into weed-ridden desert.

Besides the fact that the WOPR advocates extinction and extirpation of our rare plants and wildlife, it is unworkable for a number of other reasons. Contradictions and inaccuracies are found throughout the DEIS; I will give a few examples below:

According to the DEIS, "All four alternatives would maintain similar levels of availability and quantity of special forest products" (DEIS ch.4, environmental consequences, "Special Forest Products" section). From a scientific viewpoint, this is impossible. Clearcutting, as proposed in the WOPR, would compact soil, change light levels and temperatures, and eliminate host trees that micorrhizal fungi depend on. As mushroom pickers know, all of our most economically valuable fungi are mycorrhizal. Certainly this kind of management would damage other special forest products as well, such as shrubs that are used in floral arrangements.

The BLM claims to favor multiple uses for our public lands, but there's no question that the WOPR would favor timber harvest at the expense of most other land uses. Many tourists come to western Oregon for the amazing forests and hiking opportunities. In the DEIS the BLM dodges this issue by saying that, under the alternatives, "naturalness of BLM areas would also be little changed overall. The alternatives would maintain a mix of naturalness settings that provide a variety of opportunities and experience for visitors."

By "mix of naturalness settings," one can only assume that the BLM is referring to clearcuts interspersed with a handful of standing trees here and there, as that would become the increasingly dominant landscape under the WOPR. Surely the public can not be expected to believe that clearcuts will have no effect on "naturalness." Anyone who has walked through the dense, thorny brush that quickly springs up in clearcuts can tell you about the "variety of opportunities and experience for visitors" that such landscapes provide.

The BLM's fundamental assumption that our forests are a renewable resource is scientifically flawed. Although forests of some sort will often grow back from clearcuts, albeit very slowly, they will not necessarily resemble the old growth forests that were lost. Certainly many plants and animals from ancient forests will not reestablish themselves after decades of having no habitat. Thus the BLM's assertion that the WOPR would increase the amount of habitat for rare wildlife over the long run cannot be correct.

A management strategy of clearcutting makes no sense from an economic perspective. Clearcutting causes far greater rate of erosion than selective logging. The soil that is lost through erosion after a clearcut has a high economic value, since it is essential for the reestablishment of forest. However, there is no evidence the BLM has factored the economic value of the soil into its figures.

As an explanation for why more conservation-oriented alternative plans were not analyzed in depth, the BLM repeatedly sites the "O&C Act's requirement to manage the O&C lands that are classified as timberlands for permanent forest production following the principles of sustained yield." (DEIS ch. 2, Alternatives, "Alternatives Considered but Eliminated from Detailed Study" section) This law is used to justify clearcuts in the DEIS, but a realistic, contemporary interpretation of this mandate would mean practicing truly sustainable harvesting, such as selective thinning, which over the long run can produce more timber with far less damage than clearcutting. The WOPR violates the mandate of the O&C act to provide a permanent timber supply, and it places an unreasonable burden on our children who would have to deal with its ecological consequences.

The only case the BLM has made for advancing this destructive plan is for the economic benefit of rural Oregon counties. But in the long run, this plan will be seriously detrimental to local economies. It is clear that the economic analysis provided in the Environmental Impact Statement neither looks to the long term, nor considers the economic damages the WOPR would bring—thus offsetting the theoretical benefits.

According to the DEIS, Alternative 2 would net around 7000 jobs as compared to the no action alternative, but there is no mention of how long the jobs will last or what the workers are to do once all the trees are cut. A boom and bust scenario can hardly be considered a benefit to the local economy. There's also no mention of the jobs that would be lost upon the implementation of the WOPR—such as those of biologists--or the waste of the millions of dollars the BLM has spent surveying for rare organisms on its lands over the years. And what about devaluation the many private properties that border patchwork BLM lands where new clearcuts will be happening? In the long run, this kind of management will decrease the economic stability of western Oregon.

Although the DEIS admits that the WOPR will lead to increased wildfires, it is not clear that potentially massive losses of economically valuable timber have been factored into this economic scheme. If this plan causes as many fires as scientists predict, it is very unlikely that the plan will come anywhere close to meeting its projected economic goals.

The BLM's preferred alternative, number 2, is projected to generate a net value of \$962 million (if everything works out perfectly) over 50 years. In relation to overall federal spending that total, less than \$20 million per year, is not large, and pales in comparison to the damage the plan would cause.

I call on the BLM to consider alternatives to the alternatives. Instead of basing our economy on

the destruction of irreplaceable resources, we could bring about economic development and reach timber quotas through sustainable logging practices such selective thinning and very small clearcuts in selected areas. Increased focus on non-timber forest products and encouragement of ecotourism on BLM land would also build a truly diverse and much more resilient economy to support western Oregon.

In a time when we have more scientific data and knowledge of sustainable forestry than ever before, proposing a plan that ignores everything we have learned over the last decades does not serve the American people well. Squandering what remaining resources we have, rather than stewarding them through sustainable harvest, would hurt our children in the long run. In the meantime, it would have an immediate detrimental effect on our rare plants and wildlife, on the beauty of the places where we live, on the water quality of our creeks and rivers where salmon and other fish live.

The list of consequences just keeps on going

The WOPR is a poorly-planned document that seems to be politically motivated. Any scientist can see that it is not grounded in modern forestry science.

Many great civilizations have destroyed themselves through exhaustion of natural resources—have we learned anything from history, or must we repeat it?

Sincerely,



Jesse Miller

CC: Oregon Congressional delegation

Senator Ron Wyden

Senator Gordon Smith

Rep. Peter DeFazio

Rep. Greg Walden (R-2nd)

Rep. Earl Blumenhauer (D-3rd)

Rep. Darlene Hooley (D-5th)

Rep. David Wu (D-1st)