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P.O. Box 192  
Butte Falls, OR 97522

Western Oregon Plan Revisions  
P.O. Box 2965  
Portland, Oregon 97208

Dear BLM:

Please accept the attached 5 pages of comments on the WOPR.

Thank you,



Richard Harrington

## **Northern Spotted Owl (NSO)**

It is unclear how the WOPR Preferred Alternative (PA) can legally proceed with the “destruction or adverse modification” of inventoried NSO activity centers in the “matrix” lands in view of the ESA. In paragraph 2, on page G-1042, “critical habitat” is defined, and paragraph 3 states that Federal agencies are directed “to insure that their actions are not likely to result in the ‘destruction or adverse modification’ of designated critical habitat....” According to the **Standards and Guidelines (S&G)** of the Northwest Forest Plan, 100 acres of “the best northern spotted owl habitat” around all known (as of January 1, 1994) spotted owl activity centers are to be managed as Late Successional Reserves (LSRs) (S&G, P. C-10-11 and C-45).

I have personal knowledge of several such activity centers/designated critical habitats in the Butte Falls Resource Area. These local activity centers are, in fact, shown as small LSRs distributed over the checkerboard landscape on Map 5, consistent with the S&G. However, on Map 7 (for the PA), such “designated critical habitats” are eliminated, in apparent violation of the ESA. According to BLM, “[u]nder the [PA], the average suitable habitat on BLM-administered lands in critical habitat units would decline to 51% in 2016...” (p.G-1043). This willful destruction of inventoried NSO activity centers under the PA seems to be at odds with BLM’s reading of *Gifford Pinchot Task Force v. US Fish and Wildlife Service* (p. A-932), and the agreement that allowed reserves on O&C lands “required to avoid jeopardy to species listed as threatened or endangered under the [ESA].” (p. A-929).

BLM seems to be offering token mitigation for this decline by promoting “large blocks of suitable habitat that is distributed across a variety of ecological conditions and is spaced so as to facilitate owl movement between the blocks” and “providing dispersal habitat within and between large blocks”. The problem with this counterintuitive scheme is that such blocks currently exist and NSO numbers are declining. By reducing critical habitat by 49% and relabeling areas on the map, BLM does not make a convincing case that the PA will both provide for the survival and lead to the recovery of the species.

The obvious and likely consequence of this plan is the extirpation of the species. In such case, we will no longer need these “large blocks of suitable habitat”, and we can then proceed to efficiently clearcut these additional lands.

## **Visual Resources**

BLM states that the “Federal Land Policy and Management Act [FLPMA] provides the authority for the protection of scenic values.... However, the O&C Act prevails over the Federal Land Policy and Management Act with regard to the management of timber resources on O&C lands.” (p. 14). BLM also states that it “[c]an protect scenic values as identified through a visual resource management inventory on O&C lands where protection would not conflict with sustained yield forest management in areas dedicated to timber production” (ibid.). One could

reasonably expect, therefore, that as long as the demand for “sustained yield forest management” was satisfied, scenic values could be protected.

However, scenic values will not be protected in the majority of existing VRM managed lands because clearcutting is the almost exclusive harvest prescription. An examination of Table 32 and 33 (p. 82) reveals that BLM interprets “sustained yield forest management” to mean clearcutting. For example, in the Medford District, only 1.07% (14mmbf) of the timber for a 10 year period would come from commercial thinning, compared to 98.93% (1,296mmbf) from clearcutting (“regeneration harvest”). The result is that for the western Oregon planning area, 137,144 of the 199,296 acres of VRM Class II lands (68.8%), and 526,055 of the 586,715 acres of VRM Class III lands (89.7%) (Table 21, p. 55) would be degraded to VRM Class IV.

In the Environmental Consequences section (p. 789-792), BLM notes that visual resources would be degraded, but does not discuss the consequences of this degradation, such as the impacts on tourism, recreation, hunters and fishermen, local residents, property values, loss of annual county property tax revenue from existing and potential future residences, etc. While the O&C Act is for the economic and social benefit of the affected counties, the cumulative annual negative economic and social impacts of scenic degradation must be fairly estimated and weighed against the 60 year minimum rotation harvest profit from a clearcutting management scheme.

It should be noted that this DEIS fails to rigorously explore and evaluate reasonable alternatives. On pages 104 through 109 are presented some alternatives to clearcutting rejected by BLM, but this list is far from exhaustive of the possibilities. For example, the Medford District’s August 1992 Draft RMP and EIS discusses others such as “shelterwood cutting”, “selection cutting”, “partial cutting”, “patch cutting”—alternatives lying somewhere between no cutting and clearcutting that have been omitted from consideration in this DEIS. Harvest practices that do not degrade visual resources would not necessarily violate “sustained yield” demands, and in fact, may prove more sustainable and economically profitable upon a more serious analysis. Failure to consider reasonable harvest systems other than clearcutting resulted in the very narrow range of clearcutting “action alternatives” presented. This biased approach violates NEPA and is a very serious flaw of this DEIS document.

## **Climate Change**

The very brief discussion on climate change (p. 491) is inadequate in the face of almost daily reports of global weather extremes. BLM states that “[t]he analysis assumes no change in climatic conditions, because the specific nature of regional climate change over the next decades remains speculative.” This assumption of “no change” because “the specific nature ... remains speculative” is not logical. If “sustained yield timber management” is the highest priority, prudence demands a rigorous NEPA analysis that considers the effects of a range of likely potential regional climate changes over the short, mid, and long term for a range of timber management alternatives. For example, it appears that we are trending towards longer, hotter,

and drier summers. Under such a scenario, could high seedling mortality on replanted clearcuts possibly lead to widespread reforestation failures, hence an end to assumed “sustained yield” under intensive harvest (clearcutting) which, ironically, BLM appears to have chosen in an expectation of maximizing timber profits? Under the same climatic scenario, what would be the effect of lightly harvesting established stands in terms of “sustained yield”? It may turn out that extensive thinning across the landscape may be the only way to save our forests from the advancing ravages of climate change. Until such an analysis is performed, this decision-making process should not go forward.

On the other hand, it is not sufficient to only consider the potential adverse effects **from** climate change to “sustained yield” and O&C revenues under different management alternatives. The impacts **from** each proposed alternative to local and global climate change must also be considered—more is at stake here than short-term timber revenues to the O&C counties. BLM must present a serious analysis comparing reasonable alternatives with regard to their impact on climate. Which alternative will result in the production of the least amount of greenhouse gases; result in the least amount of temperature increase; conserve the most precipitation; contribute the least to fire susceptibility, etc.? These considerations are essential because we in the O&C counties will share in the consequences of our own negative contributions to global warming, including the potential loss of timber revenues from O&C lands.

In addition, BLM needs to address its treatment of slash under all alternatives. Burning of slash and unmerchantable timber may be considered carbon neutral”, but rapidly releases it into the atmosphere where it is not now wanted. Using it as biomass for the production of electricity or for home heating will reduce the burning of fossil fuels; and mulching the forest floor with slash will sequester at least a portion of the carbon as humus, while at the same time conserving soil moisture.

### **Clearcutting (“Regeneration Harvest”)**

In addition to the unquestionable negative impacts of the PA from clearcutting to visual resources, clearcutting has a long list of other negatives, among which are the following:

1. Successful reforestation is not guaranteed. Medford BLM has had problems in the past with failed clearcut reforestation, with some plots requiring as many as 2 additional replantings. As the summer climate trends toward hotter-drier-longer, reforestation may reasonably be expected to become more challenging.
2. In addition to climatic factors in reforestation, clearcuts are subject to an explosion of gopher populations, the consequence being seedling tree mortality and negative effects to precipitation run-off and soil erosion through their extensive tunnel systems (although they do reverse some soil compaction). Control is either by trapping or poison, neither of which are especially effective or cheap, or without controversy.

3. Clearcuts are also typically plagued by the invasion of weeds. These not only help sustain the gophers, but seriously compete with the young trees for soil moisture, and can become a public nuisance in the case of, for example, Bull thistle (*Cirsium vulgare*), which send airborne seeds throughout the countryside, including onto private lands. Control is generally by herbicides, which increases costs, and is socially contentious.

4. As BLM is well aware, clearcuts affect watershed hydrology in negative ways. Peak flows can be exacerbated in times of exceptional weather events because of clearcutting. Snowpack accumulates in clearcuts, whereas a forest canopy intercepts snow and slowly releases the melting water to the absorbent and often unfrozen forest floor when air temperatures are above freezing. This snowpack can be a hazard in the event of rain falling on the snow and rapidly melting it during periods of sudden warming. Thus clearcutting increases the danger of catastrophic flooding in the populated lowlands downstream. This represents potential costs to individuals and to municipal, county, Oregon, and Federal governments that are being ignored under the PA when calculating harvest profits.

In addition to the untimely loss of precipitation noted above, because soil compaction in clearcuts is less than perfectly reversed by ripping following harvest, runoff during normal and exceptional rainfall events is increased. While this may or may not result in flooding downstream, this increased runoff results in lower dry season streamflows, exposing more of the typical bedrock stream channel to solar radiation and ambient warm air, leading to warmer water temperatures, increased evaporation, and reduced oxygen. This impacts the fishery (which must be considered under the ESA), and therefore recreational and commercial fishery income, and also irrigated agriculture income. Because "protecting watersheds and regulating stream flow" are some of the objectives of the O&C Act, impacts to summer flows resulting from clearcutting under the PA must be addressed in the DEIS.

Beyond soil compaction, runoff during winter months as a result of clearcutting is potentially increased due to the fact that without the benefit of the forest canopy, exposed wet soils are subject to freezing. While perhaps not the hazard of a rain-on-snow event, nevertheless, a substantial rain at the freezing point will result in the loss of a substantial amount of this precipitation. Moreover, should there be snowpack over frozen soil (not otherwise frozen in the absence of clearcutting), a rain-on-snow event can be much worse than one in which the soil is not frozen. BLM is strongly urged to reconsider its choice of PA.

These potential negative impacts to watershed hydrology must be considered in the context of the existing watershed condition for each watershed. Most of the corporate industrial forestlands in the checkerboard ownership pattern in the Medford District have been heavily cut, often with rubber-tired skidders yarding throughout the rainy season and much unmitigated soil compaction. In addition, many of these same watersheds are heavily roaded. Many watersheds cannot withstand further clearcutting impacts to their hydrology. BLM must consider the cumulative impacts of prior logging and existing road density across all ownerships when selecting a PA.

5. Disregarding global climate considerations, clearcutting has a negative affect upon nearby forestlands by virtue of the fact that day time temperatures in the summer are hotter in and around clearcuts than they are in the shade of a nearby forest canopy. To the extent that this hotter air raises local forest temperatures, it creates water stress, slowing tree growth, reducing live fuel moisture, and increasing fire danger.

6. Replanting clearcuts with "superior" nursery trees carries with it the danger that locally adapted gene pools will be diluted by less locally adapted ones with less diversity, potentially having long term unanticipated effects on a forest's health. Furthermore, in the past BLM has been known to plant only one tree species on what had been a mixed species forest, and replace predominantly Doug fir forests with Ponderosa pine . These practices ignore the subtleties of forest ecology and may result in disease or insect infestations.

7. Clearcutting creates windthrow hazards to remaining adjacent stands. On January 4, 2008, a BLM parcel near my residence that had been heavily thinned in its southern one-third in the past 2 years experienced severe windthrow, with the loss of hundreds of very large trees (some over 200 years old) well beyond the thinned area. The problem probably originated with the thinning of trees all the way to the edge of that parcel where it borders on a brushfield over which the wind arrived. Notably, other portions of this forest which had not been so thinned experienced a much smaller amount of blowdown. Conifers that have grown under crowded conditions tend to grow tall straight trunks but are unprepared for exceptional wind events when their cohorts are removed. In the case at hand, the wind-unadapted trees fell like dominoes some 100 to 200 yards into the unthinned area. This is not an uncommon or unexpected phenomenon on the border of clearcuts. I bring this to your attention because this phenomenon presents a hazard to ownerships adjacent to BLM lands, and the PA will create many more opportunities for windthrow. With global warming, the frequency and intensity of exceptional weather events is expected to increase. BLM must address this unavoidable consequence of clearcutting.

The above windthrow observations are relevant to the proposed width reduction of riparian zones through clearcutting. Such action could result in the loss of significant amounts of the remaining riparian zone conifers during exceptional wind events, thereby exposing streams to direct solar radiation that the PA hopes to prevent with its minimal riparian width. BLM should reconsider its width reduction plan.