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January 9, 2008

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Mr. Ed Shepard
State Director
Bureau of Land Management
PO Box 2965
Portland, OR 97208

Dear Ed:

These comments are in response to your request for public input on the Western Oregon Plan Revision. Douglas Timber Operators is a regional trade association representing 140 members in forest products and related industries in Lane, Coos and Douglas Counties. Our members rely on BLM lands for raw material for their mills and road access to manage their private timberlands, which are predominantly the alternate sections in the BLM checkerboard ownership. In addition our employees regularly recreate in the forest enjoying hunting and fishing opportunities with your open road access policy. For all of the above wide variety of interests our members are vitally concerned about the proposed management plan revision that your agency has published.

DTO is also a member of the American Forest Resource Council, which has been actively involved in providing input to your agency in the development of this plan revision. In this position we strongly endorse AFRC's input to the WOPR and urge you to carefully review the legal and technical foundations of their work. While we believe that your development of Alternative 2 and its selection as the preferred alternative is a major step away from the reserves overlaid on the BLM lands by the Northwest Forest Plan, we are concerned that the spirit and intent of the O&C Act is still not being met with your new proposal.

More specific to the plan are our issues and concerns listed below:

Timber Supply

The timber industry in southwest Oregon is the major source of economic mainstay for our communities. We provide over half of the total lumber produced in Oregon and well over half of the panels used in home and industrial construction. These products are shipped by rail and truck to our primary markets which include California, Nevada, Arizona and New Mexico. Each shipment brings new money back into our communities that supports the infrastructure that the public desires and has come to expect, including good roads, public safety, libraries, schools and health care for the poor and elderly.

The available timber supply is the lifeblood of our industry. In this region we have for too long relied on importing a major portion of this supply from Washington State and British Columbia. This unsustainable situation was created with the shutdown of our federal forests in the early 1990's. Unfortunately the Northwest Forest Plan has failed miserably to provide as promised by the Clinton Administration even a small fraction of the raw material needs for our mills. In addition, a major part

Douglas Timber Operators, Inc. • 3000 Stewart Parkway • Suite 208 • Roseburg, Oregon 97470
Phone (541) 672-0757 • Fax (541) 672-3833

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of our logging industry has withered away since the logs we now manufacture are produced in distant locations.

The timber deficit we have been coping with in this region is roughly 600 to 700 million bd. ft. per year. New harvest levels that are proposed in the WOPR will go a long way toward eliminating this deficit. In addition we have documented that a major portion of the wood we process is larger in diameter than what can be produced in a commercial thinning or a regeneration harvest of our second growth forests. A recent study that we conducted of logs scaled in western Oregon in 2004, 2005 and 2006 shows that over 56% of our current mill capacity consumes logs over 12" in diameter on the scaling end. This equates to trees larger than 17" DBH using a 70 form class. Logs generated by regeneration harvest off the O&C lands will clearly fill this size deficit as well.

Growth of the Standing Timber Inventory

This past year we were allowed to do some modeling work with the State of Oregon for the Elliott State Forest, a 93,000 acre block of timberland located just west of Coos Bay. That modeling work allowed us to evaluate a new allowable cut proposed for the Elliott that harvested approximately 50% of the annual growth of the forest. Not surprisingly the preferred alternative of the BLM plan for the O&C lands does the same thing, harvests half of the growth. What was particularly enlightening in this analysis was to project over time what happens to the standing inventory of the forest over the planning horizon, which in the case of the Elliott was 150 years. The model showed that the Elliott's inventory would increase from 1.4 Billion bd ft to over 3.4 Billion, an increase of 240%. We know that the inventory on the O&C lands stood at 50 Billion Bd Ft. in the early 50's before significant timber harvest occurred and the most recent inventory stands at 73 Billion Bd Ft. We believe the public needs know what you project that standing inventory to be at the end of the planning horizon based on the management prescription of alternative 2. I realize you projected a major increase in Spotted Owl habitat under alternative 2 but I think the public deserves know how large the inventory gets and quite frankly what the discounted value of that inventory is in today's dollars.

Receipts to Counties

The O&C Act could not be more specific in its direction that these timberlands are to be managed for the economic benefit of local communities. Receipts from timber sales provide discretionary funds to county governments that allow them to provide essential services, including law enforcement, health care for the poor and elderly, good roads and libraries, schools and many other services. Congress and the Administration have made it abundantly clear that the federal safety net that has been used to prop up county government since the adoption of the Northwest Forest Plan is now at an end. No one has come up with an alternative to cutting trees and using the receipts to fund these essential services.

The Commercial Thinning Myth

We were very pleased to see the analysis in the plan that shows commercial thinning of the plantations in the old clearcuts can only be sustained on an average of 5 years in the five western districts. After giving it a little thought to this information, no one in their right mind could expect these plantations to produce significant volume. They just aren't old enough, and thinning is just that, taking out only a part of the merchantable volume. Further, anyone with a little practical knowledge of logging systems and costs

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knows that the cost to cable thin is often triple the cost to cable log a clearcut. That extra cost coupled with road reconstruction requirements renders the resulting stumpage from commercial thinnings so low that it is of little help in providing receipts to the counties.

Wildlife

An active timber sale program will allow the agency to restore roads, replace culverts and close roads that were not environmentally located when they were originally built. Fish and their habitat will benefit from these activities. Big game and other wildlife that need larger openings with an edge effect will all benefit with a renewed timber sale program. Hunters, fishermen and general recreationists who drive for pleasure all benefit from active forest management. Old myths prevail in this area too. Many of the hunting public does not know that big game, elk, deer and the species that prey on them all need large openings to provide summer forage loaded with protein that is so essential for their survival during the winter months. New research clearly shows that the body fat these animals store in the summer is what carries them through the winter. Winter forage and the need for thermal cover play little role in their winter survival.

Road Access

The checkerboard ownership has created a working relationship between the industrial landowner and the federal government that has been mutually beneficial for both parties. However, the present road system is in dire need of being restored to its original construction standard. Crushed rock needs to be replaced on almost all major access roads and asphalt roads are in need of patching and sealing. Roadsides are often choked with brush making them impassable. All of this essential restoration work can only be done with an active timber sale program. Furthermore, it has been made abundantly clear that Congress has not and will not provide appropriated funds to do this work. We use those same roads to haul logs, actively manage our plantations and suppress fires. Because access has been relatively good we have been successful in keeping losses from wildfire in the checkerboard ownership to a manageable level.

Carbon Sequestration and Storage

With all of the hype in the world today about global warming and greenhouse gases it seems only reasonable that a chapter be added to the final EIS discussing the beneficial effects of harvesting timber and growing trees. A recent presentation by Dr. Bruce Lippke of the University of Washington illustrated the key benefits of this process. Most folks know that trees sequester carbon through photosynthesis which combines CO₂ with water and other minerals to store carbon in the form of wood. The key part which most environmental activists conveniently like to ignore is that the best way to store that carbon is to harvest the tree, manufacture it into wood products and store them in buildings. Old growth trees because of slow growth rates do not aggressively sequester carbon. Moreover, as they die, which is a rather common occurrence, the carbon stored in the cellulose escapes back into the atmosphere rendering them almost useless over time in the process of storing it. Dr. Lippke is the president and founder of CORRIM and his Website is a virtual fountain of information on carbon sequestration and storage. The BLM plans for actively managing the O&C timberlands should identify this process as one of the key benefits for the implementation of the preferred alternative for the WOPR.

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Jobs for Rural Oregon

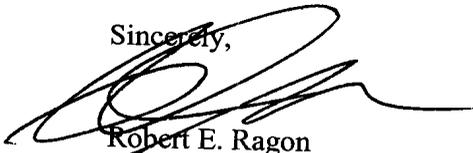
Since the listing of the northern spotted owl in the early 90's we have lost over 40,000 jobs in both manufacturing and logging. While those who oppose timber harvest on federal lands attribute this loss to mill automation, a simple trip around the state visiting abandoned mill sites is ample testimony to the real reason these jobs were lost. The annual harvest of these federal lands exceeded 5.0 Billion Bd. Ft. annually and nowhere has a replacement for this lost timber supply been found. Certainly the fact the federal government controls 57 % of the forest lands in Oregon cannot be ignored when discussing jobs for rural Oregon. The WOPR predicts job increases in excess of 3,000 under Alternative 2. What needs to be emphasized is that not all jobs are created equal. Many of the jobs that replaced the lost woods jobs are service related and are often at minimum wage with no benefits. Most forest products workers whether employed in the mills or woods are paid wages that can support a family and also include health insurance and retirement benefits. Sue Shaffer chairperson of the Cow Creek Band of the Umpqua Indians once made a very profound statement related to government services. She said "We don't need higher taxes in Oregon we need more taxpayers." Implementation of Alternative 2 as a minimum will provide those new taxpayers.

One other aspect of the availability of family wage jobs relates to schools in our rural communities. Schools that traditionally depend on families whose main wage earner works in the woods or the mills are seeing a precipitous decline in the school age student population. This decline has had a devastating impact on schools financial resources and limits severely their opportunity to add programs and staff that would improve educational opportunities in the effected communities. Under the currently restricted forest management policies on federal lands, these economies will only get worse and their school systems will suffer, for all children.

Conclusion

Development of the WOPR has been a profound and painstakingly difficult process that the BLM should be commended for undertaking. The level of detail and exhaustive analysis in the WOPR will rank this planning effort as truly one of the best of the 21st. century. We do believe however that you can shoot higher in developing the new allowable harvest level to fulfill the obligations of the O&C Act. Since the reauthorization of the Secure Schools Act is unlikely to happen, the implementation of new harvest levels under the WOPR is the only real hope our rural counties have to continue to provide basic levels of community support with opportunities for betterment for our citizens. Thank you for the opportunity to comment.

Sincerely,



Robert E. Ragon
Executive Director

cc: Governor Ted Kulongoski
Senator Ron Wyden
Senator Gordon Smith
Representative Peter DeFazio
Representative Greg Walden
State Senator Jeff Kruse
State Senator Joanne Verger
State Senator Floyd Prozanski

Representative Susan Morgan
Representative Bruce Hanna
Representative Wayne Krieger
Douglas County Commissioners
Coos County Commissioners
Roseburg Area Chamber of Commerce
Bay Area Chamber of Commerce