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

Dear BLM,

There is so much wrong with the WOPR plan that it is hard to know where to start criticizing it. I own a home on 20 acres adjacent to a 200 acre parcel of BLM land with an historic spotted owl nesting site, the Calico Creek Site, 5 miles west of Cottage Grove, OR on it. I've walked on this BLM land to a special old growth patch bi-weekly for the past 17 years, and it is a central part of my spiritual life. In this spot, I feel connected to the center of all creation, to God. Under the WOPR, this patch would be clearcut; I do not want the government to destroy my church. I thought I had a right to the freedom of religion, and I would like to see this parcel spared. However, my objections to the WOPR extend far beyond this very personal reason.

The logging levels called for in the WOPR are not sustainable, calling for cutting 58,000 acres of old-growth in the first 10 years. Cutting down 7 times more old growth when we have so little left will leave us with zero old-growth ecosystems in a few decades. These old forests provide us with clean water, wildlife habitat, fishing, hunting, other recreation, carbon storage, & tourism. Although the BLM is legally bound by the O&C Act of 1937, the act "...does not specify the harvest methods, rotation length or silviculture regimes...nor does it establish a minimum level of harvest or a minimum level of receipts" (WOPR DEIS Vol. 1, p. 10). Therefore, clearcutting old-growth is not required by the O&C Act. The WOPR allows worst case clearcutting, with even less retention of green trees than the 2 per acre required by the Oregon Forest Practices Act. I question the WOPR's "sustained yield model", as slow growing old trees can not really be "balanced" by growth against rapidly growing young trees. The public relations pitch is that the new plan will cut less timber than what is grown. This definition of sustainability, so-called "sustained yield", where tree growth equals or exceeds timber harvest, is mandated on federal forestlands. Yet, any unbiased forester, or even an idiot like me, would question how biomass growth in cubic feet fairly compares to mature timber growth in board feet. Will seedlings replace 200 yr. trees in 60 years or even 3 times as long?

Old Growth ecosystems aren't easily replaced; we are just learning of the symbiotic relationships between mycelia & tree roots. Monocultured tree farms lack genetic diversity & are subject to devastating infestations & disease, while clearcutting destroys some of these natural processes that we are just discovering to be beneficial for all forest health. Reducing the diversity of our gene pool that could serve as tomorrow's best cure for cancer (remember where taxol comes from!) is more than just dangerous; it is dumb! Paul Stamets of Fungi Perfecti, a Washington based business, recently developed an antidote to anthrax from a fungi! These ancient forests are our libraries of real life information- gene pools of flora, fauna, mycorrhiza & fungi! There is very little exploration in the WOPR of the growing markets in mycology & the growing body of medical research from the forest and the important contributions they make to our communities. What economic value is assigned to one more life saved on this earth in the WOPR?

"Young forests on BLM-administered lands are predominantly high-density, even-aged managed stands. Most of these stands were established following timber harvesting & intensive site preparation practices. This management history has created stands with a homogeneous structure, uniform tree composition, and high tree density. These young forests are developing along a trajectory that is fundamentally different from that experienced by most of the existing structurally complex forests on BLM administered lands." Vol. 1, p.205-6, WOPR DEIS. These forests are more subject to wildfire, disease, bug infestation because they are crowded & lack diversity. How is the BLM "benefiting rural communities" when it is subjecting them to increased wildfire?

Under the "preferred alternative", reserves for spotted owls would be cut 36 percent - from 809,400 acres to 521,500 acres. Reserves would be 48% smaller than the minimum needed for legal compliance and recovery of threatened species. The administration's draft recovery plan for saving the owl is based on the leaky premise that they do not require large tracts of old growth forest - and that the invasion of the barred owl represents a more serious threat than habitat loss. Six separate peer reviews by outside researchers, five of them funded by the federal government, have agreed that the recovery plan downplays the importance of protecting the Northwest's remaining stands of old growth. In October, 113 scientists wrote to Interior Secretary Dirk Kempthorne urging him to yank the owl recovery plan and questioning whether political interference tainted its conclusions. Kempthorne should have done exactly that. Instead he offered half a solution, convening a panel of experts who will evaluate the best information available on the owl's habitat needs. This plan reeks of political collusion with the timber industry, and the tax-payer bearing the brunt of the plan. According to Joan Jewett, Fish and Wildlife's Portland spokesperson, the Draft Recovery Plan is now due to be released in the spring of 2008. Until the Draft Recovery Plan is revised, the BLM will not be able to use the revision to establish NSO critical habitat within the WOPR. What assurances do we have that BLM will follow a new Recovery Plan if that plan does not yet exist? I am particularly interested in the owl issue because I see one on my land & the BLM land adjacent to me on a regular basis; I do not want to see this bird dead.

Low elevation valleys like mine serve as wildlife corridors from the Coast to Cascade ranges. Since 1991 I've seen spotted owls & their babies, bears, cougar, coyote, elk, piliated woodpeckers, red tailed hawk, harrier hawks, families of fox, porcupine, pheasant, quail, numerous birds, lampreys, trout & crawdads on my & this BLM land. All of these creatures' habitat would be threatened by increased clearcutting in this sea of industrial forest land already cut. The WOPR DEIS index (pp. 923-925) does not have a listing for the connectivity corridor that links the Coast Range with the Cascades at the very southern end of the Willamette Valley. BLM representatives that we spoke with in both the Eugene and Portland offices mentioned that this is an area of scientific weakness in the WOPR documentation. We were, however, able to find one paragraph in the WOPR DEIS that discusses the "forested bridges" (p. 293) for the northern spotted owl, including the Cottage Grove area where we live. If the BLM clear-cuts much of its checker-board old-growth holdings here, there will be no protection for this corridor that links species' habitat from the South Willamette to the North Umpqua to the Rogue Umpqua to the Ashland area (p. 294). This is a major failing in the WOPR DEIS. A final Environmental Impact Statement must address connectivity for the northern spotted owl and the marbled murrelet.

The WOPR DEIS states, "... land use allocations under the current resource management plans are not aligned with designated northern spotted owl critical habitat, and the resource management plans do not include management direction specific to critical habitat units" (p. 285). The WOPR DEIS should not have been released without this extremely important component. Until management plans are aligned with NSO critical habitat, WOPR DEIS Alternatives 1, 2, and 3 are invalid.

In a GIS analysis by U of O master's student Cody Evers, he found that the preferred alternative significantly alters land use prioritization towards logging statewide, within Owls' Critical Habitats and in known Owl Activity Zones. Under Alternative 2, nearly 1/2 of all areas currently conserved for owl recovery will be changed to "achieve a high level of continuous timber production" with rotations between 80 & 100 years. In a sample analysis in and around Cottage Grove, 90% of spotted owl Critical Habitat, as managed for recovering endangered species numbers, is reallocated to timber-management. Of this area, 6 high conservation priority documented Owl Activity Zones will be threatened, as well as 13 medium priority zones. The preferred alternative does not meet the criteria of the ESA. Specifically Section 7 (a)(2) states "federal agencies are prohibited from authorizing, funding, or carrying out actions that 'destroy or adversely modify' Critical Habitats". Most provisions of the ESA are written to prevent extinction. The ESA supersedes the 1937 O&C Act.

In addition to the negative effects on spotted owls, the BLM's proposal would cut habitat for marbled murrelets by 16 percent. After 100 years, there would be a 40% reduction in marbled murrelet nesting habitat and spotted owl dispersal habitat. Both the spotted owl and murrelet are listed under the federal Endangered Species Act as threatened with extinction.

If the WOPR is implemented, watersheds that many communities rely on for their drinking water would be damaged; BLM lands provide drinking water for 76 communities in Oregon, including the large towns of Salem, Albany, Corvallis, Eugene & Roseburg. Private landowners near proposed BLM clear cuts risk having their wells, aquifers & small streams dry up as a result of the WOPR. Stream buffers are reduced by 75% in the plan. In August, EPA officials wrote letters expressing concern that hard-won water quality gains in the Northwest that have occurred under the Northwest Forest Plan could be lost under the proposed owl recovery plan. In addition, the EPA has criticized the reduction of riparian zones under the WOPR DEIS, pointing to the fact that the recommended logging under Alternatives 1, 2, and 3 will increase erosion, silt build-up, a rise in water temperature and stream turbidity. The Clean Water Act also supersedes the O & C Act & the BLM is again setting itself up for a lawsuit, wasting more of our tax-payer dollars. The BLM's proposal would add 1,000 miles of new roads and eliminate 57 percent of the tree buffers along rivers and streams where salmon spawn. More clear cutting & roads will make it harder to fix 600 miles of already polluted streams & rivers on BLM land. The Willamette River is listed for temperature, mercury & bacteria, all of which will be negatively impacted by upland disturbance proposed by WOPR. Fishermen, salmon, & tourists will all be negatively affected; where is the information about the economic impact to rural communities when our salmon continue to die and when our residents lack clean drinking water & when entrepreneurs lose their tourism & recreation oriented businesses? These impacts are unacceptable & can not even have a price tag put on them.

Given the U.S. Environmental Protection Agency's (EPA) harsh critique of both the WOPR DEIS and the U. S. Fish and Wildlife Service's Draft Recovery Plan for the Northern Spotted Owl (Draft Recovery Plan), which impacts the WOPR, it is unlikely that WOPR Alternatives 1, 2, or 3 will stand up to legal scrutiny. Therefore, I support the WOPR No Action Alternative as the only plausible WOPR option, or preferably, a complete recrafting of the plan. By now it should be apparent to the administration that there is little chance the courts would find the plan satisfies the Endangered Species Act. Instead of proceeding with this flawed plan, the administration should craft an alternative strategy that increases timber production and provides funding for rural counties by thinning crowded stands of younger trees, rather than cutting old-growth. Much success has been had in the Siuslaw National Forest, where timber sales for thinning young stands have been profitable & unlitigated. Thinning second growth could provide more than 2 billion board feet of commercially valuable timber & provide monies for counties & jobs for forest workers. Selective thinning of crowded plantation forests is the intelligent long-term choice for economic sustainability while protecting residents from wildfire & protecting old-growth forests.

The WOPR is fraught with pseudo-"science" & computer modeling that conveniently asserts that increased logging in riparian zones, degrading & fragmenting of habitat, & clearcutting of old-growth will somehow lead to a "sustainable" forest plan. In reality, the computer models that were used to craft the WOPR do not adequately take into account stochastic factors such as climate change, bug infestation, fire, soil erosion, invasive species, floods & other acts of god that a more sophisticated model, such as the Woodstock model from Nova Scotia takes into account. I think we need to get a more accurate plan that uses the most up to date & comprehensive computer modeling.

Subsequent to the recent winter storms in Oregon & Washington that resulted in mudslides that wiped out highways and residences, the Oregon Department of Geology and Mineral Industries cited clear-cutting as the cause of these catastrophic events (The Capital Press, 12/20/2007). The extensive regeneration harvesting in the WOPR DEIS on steep slopes will likely produce similar results in

areas where BLM lands are near or adjacent to private homeowners and public roads.

European satellites showed the melting & opening of the Northwest Passage on Sept. 14, 2007. The U.S., just this month, signed an international treaty acknowledging the need to cut carbon emissions world-wide. Also, on December 19, 2007, Congress agreed to raise U.S. auto emission standards to combat the warming of the earth's atmosphere. Yet, on page 491 of their DEIS, the BLM states, "The analysis assumes no change in climate conditions, because the specific nature of regional climate change over the next decades remains speculative." The IPCC of the UN, which received the Nobel Prize in 2007, declared that "warming is unequivocal"...If we go back to our SAT days, let's remember that speculative & unequivocal are opposites. I don't think there is any speculation any longer as to whether there is climate change or to whether trees help sequester carbon. Since forests absorb carbon emissions, it seems oxymoronic to clear-cut large chunks of remaining federal forest land when other federal regulations are attempting to reduce carbon emissions. Furthermore, the complete environment of the oldest forest biosphere absorbs the most carbon. Andy Kerr, one of Oregon's premier environmental spokesmen, has written that "If one looks at the forest carbon cycle over time, clearly the most carbon is stored for the longest time in old growth forests..." (<http://www.andykerr.net/EcosysBasedCarbSeques/EBCSpaper.html>).

Saving old growth now could serve as future carbon credits if a Carbon Reduction Investment Initiative were put forward & enacted by Congress (We could look to Europe to see how they have created a carbon credit system). According to a recent study by the UN Committee on Climate Change, one acre of old growth can sequester 1,000 tons of carbon emissions per month, compared to 100 tons by second growth plantation forests. This is a solution that already exists; we know its' benefits, let's not destroy this national & worldwide resource! New scientific information in the near future and subsequent legislation concerning global warming will also supersede the O & C Act. It is myopic to use 80-year old legislation to plan forest practices for 2106, as the WOPR does.

Recent Oregon Department of Forestry documents indicate that Douglas fir stumpage prices have fallen by up to 25%. The log prices estimated in the WOPR DEIS are unrealistic given the 2007 downturn in the housing market and the fact that numerous Pacific Northwest mills are on temporary layoff or have shut down for good. The log prices as projected in WOPR DEIS are therefore unrealistic in their projections for county payments & the supposed jobs it creates are over-inflated & volatile. Jobs in the timber industry are susceptible to loss by outsourcing, automation & mechanization. The WOPR, ironically, facilitates this by changing our forests into plantations for increased ease of operations with machinery.

Technological advances in GPS, GIS, aerial & satellite mapping & computer software are moving the timber industry into more efficiency with a greater reliance on computers & large capital inputs, with less jobs for people. The authors of the WOPR claim accelerated timber harvesting will increase jobs while ignoring the fact that an almost equal amount of timber & wood products are being exported by private industry. There's no shortage of available timber for local industry to process, just a multinational timber industry, ruled by profit, who lacks commitment to locally processing wood. More likely, old-growth logs will be squared off here & shipped abroad for milling into actual lumber. The accelerated logging that will flood both local & international markets, at a time when construction is declining, is, in essence, selling our heritage for the bottom dollar. This makes no economic sense; common wisdom tells one to sell an asset when the market is high, not low. With regard to processing, there are only a handful of mills in Oregon currently capable of taking large logs from trees over 80 years old. It is unlikely that there would be significant investment in old-growth mill capacity for a very limited supply over a short period of time, especially when the possibility of future legislation or lawsuits could eliminate the cutting of federal old-growth forests at any time. More likely, old-growth logs will be squared off here & shipped abroad for milling into actual lumber. A timber dominated economy is not defined by its stability of job security.

The footnote on the bottom of p. 6 of the DEIS states that the BLM interprets

the purposes of the O&C Act to be in support of sustained yield forest management rather than enumerating additional objectives for management which would serve the economic needs of people, businesses & industries in the O&C counties. In *Headwaters v. BLM*, the judge decided in regards to O&C lands that timber would be dominant over wildlife habitat, not over people, business, or other forest dependent industries such as real estate, tourism & recreation. The law makes no inference that the needs of communities & industries adjacent to O&C lands must be solely timber communities or timber industries: tourism, recreation, & real estate are dependent industries. There is no law that says that they need to take a back seat to the timber industry. The WOPR reduces the ability of rural communities to pursue alternative economic strategies that give us the ability to choose our own future.

On page XLIII of the WOPR summary of DEIS, "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 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 & industries, and other benefits from such management to watersheds, stream flows, and recreation." I actually see the WOPR as destabilizing economically to many of these former "timber communities", such as Cottage Grove. Taxpayers will have to bear the brunt of cleaning up water, cleaning up landslides, getting ill from exposure to smoke from slash burning & to toxic herbicide use. The government is supposed to protect us, not give us cancer, lung ailments & birth defects, thank you.

Homeowners near "regeneration harvests" will face marked decrease in their property values; the loss from this alone could equal many millions per year. I have seen estimates that clearcuts adjacent to land decreases property value by 5-10%. However, given the recent sluggish real estate climate (which Oregon is still doing better than most states), I would argue that my property could be rendered "unmarketable" with a clear cut view. If multiple properties are on the market, why would anyone choose a clear cut view? Many rural property owners might find themselves unable to move, unable to count on the money they have invested in their homes. Have these costs been calculated?

Let's face it, the idea of these communities in the O&C counties as being "timber communities" is outdated. Timber jobs are volatile, subject to loss through increased technology, automation, mechanization & globalization. Real estate, entrepreneurship, web-based businesses, tourism, & recreation bring in more money to most of these communities than timber. The economic advantages given by authors of the WOPR to the timber industry are achieved at the expense of decreasing property values & job loss in these other industries. Tourism jobs can not be outsourced; Crater Lake, the McKenzie River, the Rogue River, The Row River Bike Trail can not be moved to China! Tourism jobs are less likely to be lost to automation or technology because travelers seek personalized experiences. However, tourists will go elsewhere if the scenery that they are traveling here to see is destroyed. No standing green vegetation on hillsides & muddy streams are not attractions people will come to see.

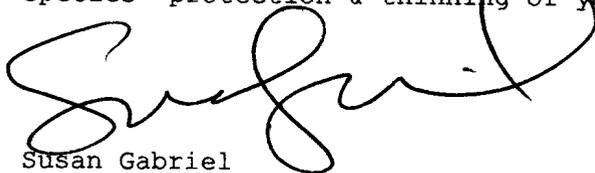
A recent study that compared environmental protection laws with economic performance on a state-by-state basis consistently found that states with high environmental standards led economic growth (Hall, 1994). Preservation of the environment stimulates economic development as new residents & businesses flock to areas known for clean water, access to recreation, strong environmental protection & overall quality of life. Many rural communities are becoming more aware that their ability to attract companies to relocate in their town depends upon their ability to provide the values & living environment that relocating companies seek (Crompton, 2007). Today, businesses are free to shop for an appealing location; they clearly prefer communities with high quality of life including an abundance of open space, parks, nearby recreation, clean water, forested landscapes, pedestrian friendly neighborhoods (Wells, 2002). A high quality of life is not just an amenity for local residents, it is increasingly a key determinant in attracting a states's leading industries (Center for Continuing Study of the California Economy, 1998).

innovation, & small business, all of which are considered to be the sources of competitiveness & growth for rural & urban areas (Manrique et al). Quality of life is a strategy of rural development & represents the collective incomes brought to a community by tourists, retirees, business owners, entrepreneurs & others who generate income & contribute to local economy (OECD 1999, Mc Granahan, 1999; Deller et al 2001, Egan & Luloff 2000). Prosperous rural counties that have more diverse economies & seek to support the establishment & growth of multiple specializations rather than a single industry are more successful (Isserman, Fesser & Warren, 2007; Harrison, Kelley & Gant 1996; Quigley, 1998). Quality of life appears to play an increasingly pivotal role in creating stable rural economies, a role that becomes more important as the traditional economies of industry & manufacturing are eroded by globalization (Salvesan & Renski, 2002).

Why do people move to the Pacific Northwest? Is it because they want to live next to regeneration harvests? Do they want to hike through slash piles? Do they want to breathe smoke-filled air? Do they want to kayak down muddy, debris-strewn rivers? Do they want erosion, floods, and mudslides on their streets and highways and in their living rooms and basements? Or do they move here because they want to live near pristine forests abundant with multiple species, clean rivers and streams that provide drinking water and recreation, and fresh air rather than smog? We think further development of communities in Oregon depends on the latter. Just in the last few weeks, I've met several new families who moved to Cottage Grove for the overall quality of life found here. They could afford the housing, are close by to recreation, have beautiful forested views, & are able to run their small home businesses here.

My neighbors & I are trying to get the word out to folks that our forests & native wildlife & ecosystems are again under attack. We have formed a group in Cottage Grove called, Forest Web, representing a diverse base of business people & we have collected over 400 signatures in opposition to the WOPR. We've contacted our local papers, been on KVAL news, have been interviewed on KLCC's Fresh Air (the story got picked up by NPR) & have invited the BLM to a talk at our Cottage Grove Community Center.

I have heard a majority of Lane county commissioners including Pete Sorensen, are opposed to the WOPR, even though they thoroughly understand the need for funding essential county services. Ron Wyden stated on KLCC on Dec. 22 that "He, and the majority of Oregonians, oppose any further logging of old-growth". While I'm fully aware that many Oregon counties have funded social services and road repair from federal regeneration harvesting revenue, I no longer believe that it is valid to destroy our valuable air, wildlife, wood, and water resources in order to run county governments. It is Congress' responsibility to protect U.S. property, and Congress, not the BLM, needs to find new ways to provide funding for counties with high percentages of untaxed federal land. Until then, hold that WOPR, I'll take mine without old-growth & with increased streamside vegetation, endangered species' protection & thinning of young forests. Thank you.



Susan Gabriel
79306 Replsleger Rd.
Cottage Grove, OR 97424

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