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Western Oregon Plan Revisions

Bureau of Land Management

PO Box 2965

Portland, OR 97208

Greetings,

Please accept these comments regarding implementation of the Western Oregon Plan Revisions (WOPR) Draft EIS, basically a plan to roll-back environmental protections on 2.6 million acres of BLM land in Western Oregon.

BASIC FACTS IGNORED IN THE WOPR:

The facts listed below are not in dispute. Global Warming is based on hard scientific evidence that is not in doubt.

1. Global Warming is a process that has arrived. It is well underway.
2. The next step in the process of Global Warming is global Climate Change. The predicted consequences threaten life on earth as we know it. The impacts will be felt by our children and grandchildren, people everywhere, and millions of other life forms worldwide.
3. The impacts of Climate Change are manifesting themselves much faster than those predicted by the atmospheric scientists who addressed the U.S. Senate and Congress 20 years ago.
4. The widespread destruction of forests has drastically reduced the ability of the Earth to naturally regulate, and reduce carbon dioxide.
5. Since the atmosphere is a global conveyer of Green House Gases, no parcels of land are insulated from lands elsewhere on Earth. Actions in one area affect the whole.
6. Forests are the only effective, proven, regulator of Greenhouse Gases known to man. Period. While reduction of emissions and all sorts of other plans to reduce emissions are good --- trees are the only thing we currently have that removes carbon dioxide gas

from the atmosphere. It works. It's ready. And the techniques are simple and easy to understand.

BENEFISTS VS HARM:

Therefore, I respectfully submit to you that the proposed WOPR is an archaic dinosaur of a plan that stands to do far more damage than any good that would be derived. The WOPR, with all of its alternatives, does not include any information about Global Warming. Yet Global Warming is a greater threat to life than all of the other environmental issues combined. I believe the law requires you to analyze the environmental impacts related to global warming.

IGNORING SCIENTIFIC EVIDENCE:

As a governmental agency, it is your duty to use the best science available in preparing a plan such as this DEIS. Ignoring current scientific data places you in violation of the law. And I believe the production of this document without considering all of the scientific evidence places it well outside the law, and as such it is doomed to fail challenge in court.

ENVIRONMENTAL JUSTICE:

Consider the remarkable statement in your Draft EIS called "Environmental Justice". The opening letter from the State Director asked to have any errors in the Draft EIS pointed out. I would like to bring to your attention your largest glaring error.

Permit me to quote the "Environmental Justice" section, word for word.

"No high or adverse human health or environmental consequences have been identified for any of the alternatives. The consequences of the alternatives are not expected to fall disproportionately on minority or low-income populations."

The errors in this section are blatantly obvious, and monumentally stupendous.

First, the machinery used in logging operations all emit greenhouse gases: From chainsaws, to heavy equipment, and helicopters, miles of new road construction, and the transportation of logs to mills that also consume energy -- all of it adds carbon to the atmosphere.

Second, the destruction of large trees which are in their prime for removing carbon dioxide from the air will compound your error. Additionally, the trees in question are evergreens, meaning they remove carbon dioxide all year long, compared to the seasonal uptake of deciduous species.

So, the BLM is basically proposing a large-scale plan which would actually increase greenhouse gas emissions dramatically, and at the same time, drastically reducing the one proven process that removes greenhouse gases from the atmosphere. It's incredible! And to state that there are no adverse human health or environmental consequences is dead wrong.

Third, as for the misleading falsehood that the consequences are not expected to fall disproportionately on minority or low-income populations, nothing you could possibly say or do could move you farther away from being honest, and telling the truth.

During Hurricane Katrina, wealthy people, and most white folks drove away in their cars. It was the low-income and minority folks who bore the brunt of the consequences in low lying areas. And this is exactly how the consequences of Global Warming are expected to play out. These facts have already been documented. As ice melts, and seas rise, the brunt of the harm will be borne by minorities and low-income people who have fewer options. There is absolutely no doubt.

Amazing! The Environmental Justice section of your EIS consists of two of the most bizarre paragraphs I have ever seen. They stand as a powerful monument to the short-sightedness of a government bureaucracy, and dismally poor leadership at it's very worst.

These claims are so outrageously wrong that I will personally feel compelled to hire an attorney, and challenge you in court. I would like to see you people try to explain your twisted logic to a Federal Judge. It would be costly, but well worth the cost.

PROPOSED NEW ALTERNATIVE:

To really be honest, and since Global Warming is undoubtedly the largest environmental issue of all time, with more dire consequences for all life on Earth, you should produce an Alternative that utilizes public forests to their absolute maximum to reduce the impacts of Global Warming.

I believe that all of our public lands will be singularly dedicated to this goal. It is not a matter of if, but when. Your agency has the trained professional staff to make this happen pretty quickly. And no one could do a better job in a short amount of time.

We need more trees, not fewer. And we need big trees. The immediate, most compelling need is for the BLM to survey its forests, and find those trees that are in the life phase of maximum carbon uptake. These will vary from species to species. As a rough guideline the trees from anywhere from 50 to 100 years old and older are in their prime right now. Simply, this is the time in the lives of trees when they are really

starting to bulk up, put on weight, and where they will stand there for several centuries removing all the carbon from the air that they possibly can. It's the time when their growth-rings really start to widen out.

BLM should dedicate its efforts to caring for the forests and ensuring that the land is doing its best to meet our needs and keep us safer. It should also be relatively easy to inventory areas and come up with calculations showing how much carbon can be removed from the atmosphere, and turned into wood.

Replanting your clearcuts and other areas with tiny seedlings won't do the atmosphere of our planet any good until 5-10 more decades have passed. There is need to act now.

I strongly suggest you recycle this dinosaur of a WOPR plan, and use our public lands to start doing something about Global Warming. You manage the only public resource that can begin working immediately to reduce the impacts of Global Warming.

CARBON SINKS VS. CARBON UPTAKE:

Many on the BLM staff seem to think a carbon sink is a growing forest. Not true. A carbon sink is a stand of massive, mature old growth-trees which contain a lot of carbon. A growing forest should be referred to and measured in terms of carbon uptake.

I think it's only a matter of time until our forests are dedicated to this singular goal. If you proceed with the WOPR as written in draft you will only reduce the options of the next generation. Only a matter of time until more catastrophes such as Katrina happen, that the BLM's emphasis switches from rampant destruction to using what forest we have left to doing some good in the world.

CONSEQUENCES OF 80-100 YEAR ROTATIONS:

Alternative 2, the chosen Alternative, talks about 80-100 year rotations between logging cycles. Again, the BLM is contributing to a destructive process by proposing to destroy trees when they have just reached maturity and are just beginning to remove larger amounts of carbon dioxide from the air. Again, incredible! The forest gets to a point where it would actually start doing some good work, and you propose to cut them down.

SLASH BURNING:

I did not find anything in the EIS about slash, the leftover wood in the forest after the loggers have moved on. Just let me say that burning slash is really, really out. If you

are talking about burning slash, then you are proposing to take carbon and directly put it in the atmosphere. It's capable of remaining in the atmosphere for centuries, your longest lasting legacy.

CONCLUSION:

Finally, your plan is so horribly obsolete and inadequate that it is worthless. This is not the latter part of the 20th century. This is not 1975. Nor is it 1982, or any of the other years in that era. That was a long, long time ago. All of the rules have changed. There are new and unparalleled threats. We now recognize them clearly. Such a plan as the WOPR is a full four decades too late.

You talk about Spotted Owls, and Marbled Murrelets – two key species. I'm talking about thousands of species whose existence is on the line --- including humans. You're talking about road construction and putting more carbon in the air, and the polar icecaps are melting. More people than ever are starving, and you are talking about expanding desertification. The forest-fire season in the West is getting longer, by over two full months, and you dare to suggest more clearcutting. And there has never, ever been a logging plan that made the forests safer from catastrophic wildfire. And those wildfires simply place more greenhouse gases in the air. The WOPR is not partially wrong, it is 100% dead wrong.

If you can't do anything right, then just leave the forest alone, and stay out of the woods. Oncoming generations will know what to do. And political change may come along long before you think.

Personally, I suggest BLM employees should stand up en masse, as an organization of highly-trained professionals, and tell your superiors in Washington just how horrible this plan is. You might be amazed to see how quickly a majority of Americans would stand up and support you.

Sincerely,


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