

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

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Dear BLM,

This letter is to register my comments on BLM's WOPR: the new proposed management plans which "incorporates the recent results from the last ten years of research under the current plan".

As a woodlot owner/operator and neighbor to the BLM plot southeast of Cottage Grove (next to the mile-5 marker on Mosby Creek road), I attended your technical review meeting in Eugene with great interest; here the scientific justification for the new plans were presented professionally by a competent staff. Unfortunately, the management directives for the study criteria do not reflect current reality (ecologically or economically) and the sophisticated simulation models, which we were shown, have not yet been validated.

While recognizing that trees provide a great renewable resource for lumber and energy (biomass) and with proper management, can be sustained indefinitely, we must also recognize the critical importance of forests in regulating the biosphere of our planet. In the 2006 OFRI sponsored conference on "Forests, Carbon, and Climate Change", we learned that the great forests of the planet (rain forests and the Pacific NW forests) along with the oceans dominate the absorption of CO₂, although not enough to keep up with manmade release. The detailed "cradle-to-grave" studies of carbon sequestering by trees and wood products all indicated optimal rotation periods of 150 years and higher, some even claiming the old growth forest was optimal. Unfortunately, the current BLM management directive calls for the most simplistic definition of "sustainable" yield, namely that based on equivalent volumetric yield; at the next level, we might argue for sustainable in kind (replacement of high quality 150 year growth with its equivalent), and from the perspective of flora and fauna, a sustainable ecosystem. By taking the narrow interpretation of sustainable yield, the present BLM directive trades short term economic gain against the longer term costs to our environment.

The quantification of forest regeneration and riparian impact by detailed computer modeling is, of course, highly desirable and provides rationale for good decisions. In my previous work as an aerospace engineer, we used detailed computer models for turbulent fluid flow, structural analysis, engine performance: each model verified by thousands of tests in wind tunnels and test stands. Yet, the models for simulation of an old growth forest, many times more complex than jetliner or space rocket, have not been verified by even one complete test. In "Forest of Time, A Century of Science at Wind River Experimental Forest" by Herring & Greene, OSU Press 2007, we see one hundred year old experiments still underway and producing surprising results; in short, we have yet to "reconstruct" an old growth forest. At the present immature stage of "forest" simulation computer models (not to mention climate

change modeling), cautious interpretation and conservative action is called for versus the optimistic use I witnessed at the technical review meeting.

My next comments concern the BLM proposed plans for the Mosby Creek watershed in which we live. Mosby Creek watershed starts at the Calapooya divide and flows north until Mosby Creek (really a small river) joins into the Row River; this watershed is about 100 square miles in area and more or less "pristine" in the sense that industrial logging came late, was never dammed, and very little mining activity. The forest land beyond the 9-mile mark is mostly private industrial forest and BLM. The land before the 9-mile mark is composed of small woodlots, some industrial forest, and some agriculture. Survey by small airplane reveals some scattered tracts of old growth forest, mostly along the bluffs which circle around the valley and extending up to about 5000 feet at the divide. Although not directly confirmed, I suspect all of this old growth is on the BLM lands. In addition, there is a 40 acre parcel of old growth on the BLM land which corners my property. Incredibly, ALL of this old growth forest would be taken out of reserve under the BLM desired alternative 2 plan. The proposed WOPR plans are in contradiction with the recommendations made in the BLM November 2000 report: "Mosby Creek Watershed Analysis"; it is incredulous that forest science has changed this much in the past seven years. The BLM plot adjacent to our property contains trees with measured dbh values over 6 feet along with huge snags and so on; experienced foresters have indicated their age is probably over 300 years; this is unique habitat bounding Mosby Creek. The clear-cut areas in our watershed are already extensive, especially on the west side of the valley. While the short term experience with 2nd and 3rd rotations has been favorable for current Douglas fir regeneration practice, the complete story is still uncertain and the small amount of remaining old growth in this valley should be saved as reserve. Certainly, BLM should not log closer to our fish-bearing creeks which flow into Mosby Creek.

Given the critical importance of our forest land at every level: its economic value as a renewable resource, the planet's biosphere, our water supply, enjoyment of the forest, BLM should reconsider the proposed WOPR and account for the longer term impacts. Government forest land should be managed under the highest level of care: prudent and with a long term vision of use for the people. In particular, BLM should reserve what true old growth is left, should set an example for industry by developing 150 year rotations so that large-timber mills do not have to rely on destruction of remaining old growth, and should develop alternative practices to enhance sustainable harvesting such as: thinning, mixed tree species to improve resistance and value (e.g. cedar, redwood, alder, etc), mixed rotation, more reasonable sized clear-cuts, etc.

Sincerely,



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cc. Gov. Kulongoski, Sens Ron Wyden & Gordon Smith, and Reps. Greg Walden, David Wu, Earl Blumenhauer, Peter DeFazio and Darlene Hooley.