2087.2

RE: MUSTY SARDINES SCOPING COMMENTS

1614 (OR 115)

This letter offers scoping comments from the Klamath-Siskiyou Wildlands Center (KS Wild) the Cascadia Wildlands Project (CWP), the Siskiyou Project and Umpqua Watersheds (UW) regarding the Musty Sardines Timber Sale.

PLEASE THIN THE PLANTATIONS AND RETAIN THE OLD-GROWTH

While the vast majority of the public, as well as corporations such as Boise Cascade, Kinko's, and Home Depot have foresworn old-growth logging, the Medford BLM seems unable or unwilling to change with the times. We urge the Butte Falls Resource Area to take its own rhetoric regarding "healthy forests" to heart and to cease converting socially and biologically valuable old-growth forests into fiber plantations.

The Butte Falls Resource Area often contends that it is unable to even consider (let alone implement) second-growth thinning projects in the matrix land use allocation due to the mandates of the Northwest Forest Plan (NFP). Yet the Resource Area has little hesitation in proposing large diameter logging projects in the LSR land use allocation for "economic rather than ecological purposes." Indeed, the Butte Falls Resource Area's proposal to log large diameter snags from deferred watersheds, critical habitat, and key watersheds within the Timbered Rock burn, demonstrates to us that the BLM strictly adheres to NFP land use allocations only when they call for logging. Further, since the BLM has elected not to implement the survey and manage and ACS provisions of the NFP (see the 2004 RODs Supplementing the NFP) we believe it is disingenuous of the agency to contend that the NFP mandates that the BLM must develop old-growth liquidation timber sales in the matrix.

When analyzing the impacts of this proposed timber sale, please include the foreseeable and inevitable impacts of eliminating the late-successional and riparian reserves as per the WOPR RMP revision process. The Musty Sardines NEPA analysis cannot rely on riparian reserves and late-successional reserves to mitigate or lessen the impacts of this particular late-successional timber sale on wildlife habitat and aquatic health because the Medford BLM is currently in the process of eliminating those very reserves.

Further, since the BLM has elected not to implement the survey and manage and ACS provisions of the NFP (see the 2004 RODs Supplementing the NFP) we believe it is disingenuous of the agency to contend that the NFP mandates that the BLM is constrained to only develop old-growth logging alternatives in the matrix. Again, the BLM seems to pick and choose which portions of the Northwest Forest Plan it considers worthy of implementation.

When the BLM does propose harvest treatments that may actually result in healthier forests, KS Wild is happy to endorse those timber projects. See the Hellgate HFI pilot project and Peavine Thin timber sale as examples. Unfortunately the Butte Falls Resource Area is not know for proposing projects that avoid the conversion of old-growth forests in fiber plantations. Timber planners in the Siuslaw National Forest have actually exceeded their

NFP timber targets by focusing exclusively on the thinning of second-growth plantations. Attachment #1 to these comments is an editorial from the Oregonian in which the editorial board recognizes the success of the Siuslaw approach and states that "Instead of clawing for more old-growth, the industry should be pushing for more timber sales and a more predictable supply of logs from the tens of thousands of acres of Western Oregon that are covered with too-thick, even-age stands planted 30 or 40 years ago." Everyone except the timber planners in the Medford BLM seems to agree on this. By continuing to push old-growth timber sales, the Medford BLM is willfully harming ecosystems, ignoring the public, and creating social conflict. You need to step away from the old-growth and demonstrate that you are capable of managing the thousands of acres of plantations that you have already created.

Even the current Chief of the BLM knows that old-growth logging should be a thing of the past. Attachment #2 is an August 27, 2002 article in which Ms. Kathleen Clarke makes many statements that led us to believe that the BLM valued both public collaboration and late-successional forests. In particular Ms. Clarke stated that "The projects I've been out on, they are leaving all the big trees and going in for the smaller ones -that is the standard practice out there now." Please note it is NOT the standard practice in the Butte Falls RA. In fact, the average diameter tree/snag proposed for logging in the Elk Creek LSR (Timbered Rock) was 26 inches in diameter. Also, please note that Ms. Clarke made the statement at least a year before any "Healthy Forest" projects had been implemented. In other words, the projects "she had been out on" were part of the existing BLM management program before implementation of the HFI. KS Wild would very much like to follow Ms. Clarke's advice and work with the BLM to thin smaller trees to create forests that are similar to those before aggressive fire suppression began. But the Butte Falls Resource Area seems unwilling or unable to propose management activities that do not target large diameter trees old-growth trees for harvest.

We also bring to your attention attachment #3 which is a 8/23/03 article by former Forest Service Chief's Mike Dombeck and Jack Ward Thomas advocating that the federal land management agencies "declare harvest of old-growth forests off-limits and move on." We couldn't agree more.

It is reasonable to follow the advice of the Oregonian Editorial Board, the current Chief of the BLM, and the past two Chiefs of the Forest Service and focus active management and fiber production on thinning small diameter material in plantations. We formally request the development and implementation of an action alternative that thins existing fiber plantations and small diameter material while retaining late-successional forests. We suspect that the Medford BLM will reject this request out of hand and instead follow the familiar route of attempting force the regeneration of late-successional forests on an unwilling public.

CITIZENS ALTERNATIVE

KS Wild, CWP the Siskiyou Project and Umpqua Watersheds hereby propose an action alternative for the Musty Sardines project in which:

- Existing plantations are commercially thinned so as to increase vigor and provide wood fiber to meet the intent of the Medford RMP and the O& C Act;
- Remaining late-successional forests are retained;
- No new permanent or "temporary" logging roads are constructed;
- Existing roads are upgraded;
- And road density is reduced.

We hope that the BLM will develop and implement a timber sale that follows those parameters.

NORTHERN SPOTTED OWLS

- What is the current condition of the nearby LSRs? Are they functioning?
- What is the status of connectivity in the matrix?
- Does the BLM have a NSO recovery plan?
- Does the BLM anticipate "take" from this timber sale?
- We strongly recommend consideration of an alternative that does not degrade or remove suitable, or critical NSO habitat.

SURVEY AND MANAGE

Please be advised that the 2004 ROD eliminating the survey and manage program so as to expedite old-growth timber sales violates FLPMA and NEPA. If you tier to this document the timber sale may be enjoined. Also please be advised that in addition to the NFP, your RMP relies on the assumption that the BLM will implement the survey and manage program. Please be explicit in analyzing and disclosing how the project complies with the survey and manage provisions of the Northwest Forest Plan.

CUMULATIVE IMPACTS

- What is the relationship between the proposed Musty Sardines timber sale and prior planning efforts that were done pursuant to the Cleveland Railroad and Musty Donut timber sales? How will units that were "considered but eliminated" from those projects be treated in the Musty Sardines project?
- What is the percentage of late successional old-growth (LSOG) habitat remaining on federal lands in the watersheds were this project is located?
- How is the BLM calculating and identifying the mandatory 15% retention of late successional forests in watersheds were little remains? Please clearly address these questions and concerns in the NEPA document for this project.

COARSE WOODY MATERIAL

Coarse woody material densities should support the natural range of biota for the site. Snags and down logs build soil and provide habitat for a variety of organisms critical to ecosystem recovery after natural disturbance. The adaptive management direction of the NFP encourages site-specific research and planning for CWM retention.

SOILS

Soil integrity is a key issue for this timber sale.
Please address soil chemistry, productivity, hydrology, and biological integrity on a site-specific (i.e., unit-by-unit) basis. Please map soil types and composites using field reconnaissance data and include the maps in the NEPA document. Include a qualified, journey-level soil scientist on the ID Team. Design actions and mitigation after you have collected field reconnaissance data on soils at every site proposed for action.

AQUATIC CONSERVATION

Threatened and sensitive fish species exist downstream of the project area. Aquatic conservation is therefore a significant issue for this action. Direct, indirect, and cumulative effects of proposed activities on hydrologic function, sediment regimes, stream temperatures, nutrient cycling, pH, and habitat connectivity should be evaluated in detail. Consider both positive and negative impacts. Implement the ACS at the site scale and meet its objectives immediately after the project's implementation, not in the "long-term" several years out.

Please analyze and disclose potential impacts to Coho Salmon and Steelhead trout in the planning area.

Please be advised that the ROD to weaken the ACS violates NEPA and FLPMA. If your analysis tiers to this document, rather than implementing the ACS as required by the Northwest Forest Plan, your project may be enjoined.

NOXIOUS WEEDS

Intensive forest management and log extraction risks introduction and spread of noxious weeds. Vehicular travel is the highest risk vector for alien plant invasions. Be explicit about mitigation measures and their empirical effectiveness under similar site conditions. Learn from past operations. Do not blindly rely on generic mitigation measures from the Land and Resource Management Plan.

PLEASE AVOID NEW ROAD CONSTRUCTION

Attached to these scoping comments (attachment #4) you will find a peer-reviewed article by Trombulack and Frissell (2000) detailing some of the negative impacts of road construction and use on Terrestrial and Aquatic ecosystems. The BLM must address and avoid the harmful impacts detailed in this study. The abstract for the article reads as follows:

Roads are a widespread and increasing feature of most landscapes. We reviewed the scientific literature on the ecological effects of roads and found support for the general conclusion that they are associated with negative effects on biotic integrity in both terrestrial and aquatic ecosystems. Roads of all kinds have seven general effects: mortality from road construction, mortality from collision with vehicles, modification of animal behavior, alteration of the physical environment, alternative of the chemical environment, spread of exotics, and increased use of areas by humans. Road construction kills sessile and slow-moving organisms, injures organisms adjacent to a road, and alters physical conditions beneath a road.

Vehicle collisions affect the demography of many species, both vertebrates and invertebrates; mitigation measures to reduce roadkill have been only partly successful. Roads alter animal behavior by causing changes in home ranges, movement, reproductive success, escape response, and physiological state. Roads change soil density, temperature, soil water content, light levels, dust, surface waters, patterns of runoff, and sedimentation, as well as adding heavy metals (especially lead), salts, organic molecules, ozone, and nutrients to roadside environments. Roads promote the dispersal of exotic species by altering habitats, stressing native species, and providing movement corridors. Roads also promote increased hunting, fishing, passive harassment of animals, and landscape modifications.

Not all species and ecosystems are equally affected by roads, but overall the presence of roads is highly correlated with changes in species composition, population sizes, and hydrologic and geomorphic processes that shape aquatic and riparian systems. More experimental research is needed to complement post-hoc correlative studies. Our review underscores the importance to conservation of avoiding construction of new roads in roadless or sparsely roaded areas and of removal or restoration of existing orads to benefit both terrestrial and aquatic biota.

-Trombulak, S.C. and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. Conservation Biology 14(1): 18-30.

FIRE HAZARD AND RISK

Disclose the effect of leaving untreated logging slash in the timber sale units even for a short period of time. Be explicit about potential wildfire behavior and risk of escape from initial attack prior to slash clean-up.

Please address the conclusions found in the recently published peer-reviewed paper:

Odion, D.C., E.J. Frost, J.R. Strittholt, H. Jiang, D.A. DellaSala and M.A. Moritz. 2004. Patterns of fire severity and forest conditions in the western Klamath Mountains, California. Conservation Biology 18(4): 927-936. Attachment #5.

SUMMARY OF THE ODION PAPER

Contemporary wildland fires in the western Klamath Mountains exhibit severity patterns consistent with those of historical fires.

Low-severity fire effects predominate with variable amounts of moderate and highly severe effects creating landscape patches. Only differences in mapping criteria applied to fires in 2001 and 2002 reflect severity patterns different from those of historical fires.

Long absence of fire predicts low severity fire effects. Absence of fire enables closed canopy forest vegetation to replace shrub and open forest vegetation through succession. Shade reduces available fuel below the canopy as well as its potential surface heat output during fire events, making canopy fires less likely to occur. Therefore, severe fire effects are not correlated with the age of woody fuels. Instead, weather and climate dictate canopy fire behavior in closed canopy forests.

The proportion of highly severe fire effects in 1987 was greatest in open forest and non-forest vegetation. High-severity effects to vegetation communities dominated by shrubs, hardwoods and young trees tend to maintain that vegetation over time, just as fires of lower severity in closed canopy forests tend to maintain that vegetation type. This heterogeneity of fire effects may be an important contributor to landscape structure and biodiversity. Stand replacing fires, to some degree, are ecologically beneficial.

The spatial distribution of highly severe fire effects in 1987 was strongly associated with the previous occurrence of fires that exhibited high-severity effects in the same locations. Much of the observed high-severity "reburn" effects happened where post-fire salvage logging in 1977 had left behind flammable slash and tree plantations.

Tree plantations, which typically follow high-severity fires under traditional forestry practices, exhibited "twice the burn severity" of closed canopy forests (20 percent), even though they accounted for only four
(4) percent of the study area. The relative combustibility of structurally homogenous tree plantations supports a self-reinforcing "feedback" dynamic of high-severity fires, and the authors anticipate continued high-severity fires in roaded and planted portions of the landscape.

MANAGEMENT IMPLICATIONS OF THE ODION PAPER

The central conclusion of the paper is that long absence of fire predicts low-severity fire effects in Klamath mixed evergreen forests. This conclusion has four management implications:

1. The fuel build-up model formulated for southwestern ponderosa pine forests does not apply to Klamath mixed evergreen forests, and fuel treatments intended to prevent crown fires based on this model are misdirected.

2. Fuel treatments designed to impose a low-severity fire regime may be ecologically detrimental because highly severe fire effects, to some degree, support diverse vegetation community structures and habitats for which the Klamath region is globally unique. Some fuel treatments also may adversely affect soils, water quality, wildlife habitat, and spread noxious weeds.

3. Fuel treatments may be ecologically beneficial in tree plantations where past logging left behind unnatural fuel profiles.

4. Naturally ignited wildland fires may be beneficial to a variety of conservation objectives in Klamath forests. Home ignitability mitigation in the wildland-urban interface may increase options for backcountry wildland fire use.

LOGGING CREATES DANGEROUS FUEL CONDITIONS

The proposed logging could substantially increase available fuel loads by relocating tree crown material (i.e., tree tops, limbs, needles) that is not currently available to burn to the soil surface, where it would become available fuel for flaming combustion. Relocating flammable biomass from the canopy to the soil surface would dramatically change the fuel complex in the project area and significantly increase the immediate risk of a severe fire.

The National Fire Danger Rating System assesses fire behavior and determines whether control efforts will be effective. That model considers heavy logging slash to generate the highest fireline intensity of any wildland fuel type when it is dry (Andrews and Rothermel 1982). The change in the fuel model resulting from logging would cause higher rates of fire spread and greater flame lengths when an ignition occurs. Logging without timely treatment of slash is the single most important factor contributing to an increase in the severity of wildfires (Stephens 1998, van Wagtendonk 1996, Weatherspoon 1996).

Direct attack of fire would not be possible under certain weather conditions, so indirect suppression measures would become necessary. This, in turn, would increase the size and cost of the next wildfire. It also increases the likelihood of severe soil heating in the logging units, and it threatens fire fighters and rural residences near the project area by making wildfires more erratic and difficult to control.

NEPA requires federal agencies to assess the direct, indirect and cumulative effects of the proposed action, as well as the past, present and reasonably foreseeable future effects of federal and non-federal actions (40 C.F.R. 1502.16, 1508.7). Hence the agency must assess the environmental impacts that will result from leaving slash in the logging units.

EVEN AGE TREE PLANTATIONS ARE UNNATURALLY COMBUSTABLE

Tree planting authorized in the project would establish even-age plantations containing unnaturally combustible fuel complexes, further increasing the severity and difficulty of control of the next fire. Plantations are far more susceptible to severe fire effects than unmanaged forests (DellaSala et al. 1995), especially where logging slash remains untreated (Weatherspoon and Skinner 1995). The elevated susceptibility of plantations to severe fire is due to:

a.. Structural characteristics that promote high heat energy output by fire (Sapsis and Brandow 1997).
a.. Warm, windy and dry microclimates compared to what would exist in an unlogged forest that possessed more structural diversity and ground shading (Countryman 1955, van Wagtendonk 1996).
a.. Accumulations of fine logging debris on the ground surface (Weatherspoon and Skinner 1995).

The number and distribution of even-aged plantations has altered fire behavior and effects at both stand and landscape scales (Hann et al. 1997, Huff et al. 1995). The existence of very combustible even-age tree patches on a forest landscape creates the potential for "a self-reinforcing cycle of catastrophic fire" that the project would perpetuate (Perry 1995). Most plantations occur next to roads, which spread invasive and exotic plants with poor resistance to fire (DellaSala and Frost 2001), and increase the risk of human-caused ignitions (USDA 2000).

Effects of even-age plantation establishment on the local fire regime require disclosure and assessment in an EIS because the project threatens public health and safety in a rural interface area, is likely to be highly controversial, and presents unique and unknown risks that are significant (40 C.F.R. 1508.27(b)(2), (4) and (5)).

The Butte Falls timber planners should be aware that the Timber Rock Fire burned through 27,000 acres in the Elk Creek Watershed on the Upper Rogue River. The Damage Appraisal Report by the Oregon Department of Forestry found that of the forests 200 years and older that burned only 10% burned high intensity, while 100% of the tree farms less that 35 years old burned so intense that all the trees died.

The Musty Sardines ID Team may be less familiar with the findings of the March 2003 Wildfire Effects Evaluation Project conducted by the adjacent Umpqua NF. This report found that:

"The young vegetation, including plantations, experienced a disproportionately high amount of stand replacement mortality caused by crown fires as compared to older, unmanaged

forests. Seventy four percent of the plantations that were less than 20 years old were lost. Plantations had a tendency to increase the rate of fire spread and increased the overall area of stand-replacement fire effects by spreading to neighboring stands."
Page 4

"Fire burned most plantations with high intensity and spread rapidly through the canopy of these young stands." page 20.

"Plantation mortality is disproportionately high compared to the total area that plantations occupied within the fire perimeter.
In fact, mortality in plantations accounted for 41 percent of all mortality on the fires, while the plantation area represented only 22 percent of the total area within the fire perimeter." page 26-27.

"As noted previously, these early seral stands cover a greater portion of the landscape today than occurred historically. Crown fire spreads readily through these young stands: rates of fire spread can be high, and significant areas or mortality can occur in and adjacent to these stands."
page 32.

"The extent, and dispersed pattern, of managed, regenerated stands prior to the fire was outside the range of natural variability in most landscape areas. This early-seral vegetation pattern, and the types and arrangement of fuels present, increased the fire's rate of spread and the area of stand-replacement fire effects." page 64.

And finally the report says that the fire behavior in the old growth was normal--

"The pattern of mortality in the unmanaged forest resembles historic stand-replacement patch size and shape." page 64.

TRACTOR YARDING

We are very concerned about the proposed tractor yarding. Please note that ground-based logging causes higher incidences of root damage and scarring of residual trees (compared to skyline systems).
Kellog, L., Han, H.S., Mayo, J., and J. Sissel, "Residual Stand Damage from Thinning-Young Stand Diversity Study," Cascade Center for Ecosystem Management.

Soil loss with respect to method of harvest is directly related to the amount of soil disturbed and bared by harvest activity, especially the density of skid trails and roads required to access the timber. Megahan (1981) found tractor logging on granitics to result in 28 percent of the soil disturbed, ground cables with 23 percent, suspended cables with five percent and helicopter logging with two percent.Similarly, Swanston and Dyrness (1973) found tractor yarding in granitics to result in 35.1 percent bare soil, hi-lead in 14.8 percent and skyline in 12.8 percent. In a Trinity County study on mixed soil types, skid trails averaged four to eight percent (6-12 km/sq.km) for clearcut areas (Scott et al., 1980).

http://www.krisweb.com/biblio/klamath_srcd_sommarstrometal_1990.pdf

MATURE/LATE SUCCESSIONAL FORESTS & INSECTS AND DISEASE

"Logging is not a surrogate for natural fire process. No mechanical means of fuel reduction - grazing, timber harvesting, thinning, or biomass utilization- can duplicate the unique ecological effects of wildland fire, such as soil heating, nutrient cycling and alteration of community composition and structure."

-Deadman's Palm EA, page III-18.

"Late-successional forest communities are the result of a unique interaction of disturbance, regeneration, succession and climate that probably can never be created with management. At present, we do not even fully understand the structure, species composition, and function of these forests. The best we can hope to accomplish through silviculture is to at least partially restore or accelerate the development of some of the structural and compositional features of such forests. Because they will be regenerated by different processes during a different period from that of the existing late-successional forests, it is highly likely that silviculturally created stand will look and function differently from current old stands that developed over the last 1,000 years. Consequently, conserving a network of natural old-growth stands is imperative for preserving biodiversity into the future."

-FEMAT IV-31,32.

The scoping notice for this project indicates that "[C]ompetition for water and nutrients in overstocked forest stands reduces tree vigor making them more susceptible to dying from insect attacks, drought, and uncharacteristic fire."

The EA for this project must address the significant scientific controversy reflected in the following peer-reviewed documents and studies concerning logging to influence insects and disease.

A recent report by the Xerces Society includes a summary of relevant studies on the importance of insects to forest function and the methods used to control forest "pest" insects, and a compilation of summaries of over 150 scientific papers and Forest Service documents.

The report may be downloaded in .pdf format from
http://www.xerces.org/Forest_Pest_Myths/Logging_to_Control_Insects.htm

See Black, S.H. 2005. Logging to Control Insects: The Science and Myths Behind Managing Forest Insect "Pests." A Synthesis of Independently Reviewed Research. The Xerces Society for Invertebrate Conservation, Portland, OR.

Key findings in the report include:

- Native forest pests have been part of our forests for millennia and function as nutrient recyclers; agents of disturbance; members of food chains; and regulators of productivity, diversity, and density.
- Fire suppression and logging have led to simplified forests that may increase the risk of insect outbreaks.

- Forests with diverse tree species and age classes are less likely to develop large insect outbreaks.
- There is no evidence that logging can control bark beetles or forest defoliators once an outbreak has started.

Although thinning has been touted as a long-term solution to controlling bark beetles, the evidence is mixed as to its effectiveness. The report also outlines general guidelines to follow when considering pest insects and forest management.

"The findings are very clear," said Scott Hoffman Black, executive director of the Xerces Society for Invertebrate Conservation and author of the report. "A review of over three hundred papers on the subject reveals that logging is not the solution to forest insect outbreaks and in the long run could increase the likelihood of epidemics."

While the BLM must examine, incorporate and respond to all of the relevant peer-reviewed citations regarding insects and disease contained in the Xerces Report, we hereby especially highlight four papers for your consideration.

Schowater, T.D. 1990. Consequences of insects. In Symposium Proceedings. Forests -Wild and Managed: Differences and Consequences. January 19-20, 1990, pp. 91-106. University of British Columbia, Vancouver, BC.

Summary: Forest insects and pathogens do not threaten forest resources unless changes in forest conditions facilitate population growth.
Healthy trees in diverse forests are protected from potential pests by defensive compounds that kill or deter plant-feeding pests, and by the abundance of non-hosts that increase the distance between hosts and chemically hide host trees. Contrary to numerous assertions, old-growth forests are highly productive and remarkably resistant to potential pests.

Aber, J., N. Christensen, I. Fernandez, J. Franklin, L. Hidinger, M. Hunter, J. MacMahan, D. Mladenoff, J. Pastor, D. Perry, R. Slangen, and H. van Miegroet. 2000. Applying ecological principles to management of U.S. national forests. Issues in Ecology No. 6. Ecological Society of America, Washington, D.C.

Summary: The authors identify major ecological considerations that should be incorporated into sound forest management policy and their potential impacts on current practice. There is no evidence to support the view that natural forests or reserves are more vulnerable to disturbances such as wildfire, windthrow, and pests than are intensively managed forests. Indeed, there is evidence natural systems may be more resistant in many cases. The spread of native and exotic pests and pathogens in many forest systems can be linked to the simplification and fragmentation of the forest. From an ecological standpoint, the strategy with the greatest probability of long-term success in protecting forests against pests and pathogens is one that encourages the maintenance of a diverse set of controls, such as occurs in nature.

Franklin, J.F., D.A. Perry, T.D. Schowalter, M.E.

Harmon, A. McKee, and T.A. Spies. 1989. Importance of ecological diversity in maintaining long-term site productivity. In Maintaining the Long-Term
Productivity of Pacific
Northwest Forest Ecosystems, ed. By D.A. Perry, pp
82-97. Timber Press,
Portland Or.

Summary: Disease and insect problems may be worse in managed stands than in natural stands. The authors suggest that old-growth forests have greater diversity of insect predators, which may in turn limit pest insect populations. They also suggest that damage by herbivorous insects could increase as the area of old-growth forests diminishes.

Schowater, T.D. 1995. Canopy arthropod communities in relation to forest age and alternative harvest practices in western Oregon.
Forest Ecology and
Management 78: 115-25.

Summary: The author compared arthropod community structure in replicate Douglas-fir and western hemlock canopies in intact old-growth stands; natural, mature stands; and regenerating plantations in western Oregon. Species diversity and abundance for several taxa, especially predators and detritivores, were significantly lower in plantations than older forests. Old-growth stands had less variability (tighter clustered) arthropod diversity and abundance than partially harvested stands. The data suggest that Douglas-fir canopies may largely recover old-growth structure by 150 years. The author concludes that the recent conversion of large portions of old-growth and mature forests to young plantations (in Oregon's Willamette National Forest) likely has reduced regional populations of many predator and detritivore species. Reduced predator diversity increases the probability that herbivores will escape regulation by predators, which could lead to a greater likelihood of pest outbreaks.

RIPARIAN RESERVES

The scoping notice indicates that the BLM is contemplating logging activities in Riparian Reserves.

- How will yarding activities in Riparian Reserves contribute to the attainment of the objectives of the ACS?
- Will existing snags be felled in Riparian Reserves to facilitate logging activities?
- Are Riparian Reserves in the project area currently functioning?

CONCLUSION

In conclusion we urge the BLM to begin the process of restoring trust with the public that your agency is truly interested in healthy forests and providing sustainable wood fiber, rather than simply converting late-successional forests into fiber plantations. There is widespread social and scientific consensus that the BLM can and should be thinning the 6 billion board feet of 12 inch DBH and smaller trees on the District that are located near to the existing road system. Please see the BLM's Small Diameter Material Inventory, December 1, 1999, File Code 2430. We urge you to change course and work with the public to establish truly healthy forests and communities by thinning the plantations that you have already created.

Sincerely,

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Since the first wagon trains made their way to Oregon, 95 percent of the state's old-growth forests have been logged. To prohibit clearcutting of the remaining ancient forests on public land was one of the objectives of the Northwest Forest Plan, enacted in 1994.

But now the federal government has devised the Western Oregon Plan Revisions or WOPR, a plan to clearcut our remaining forest heritage on Bureau of Land Management lands. The Oregonian reports that the draft plan would boost logging of trees 200 years and older by 700 percent over the next decade.

Unless this proposal is halted, protected streamside forests and old growth reserves on an area larger than Rhode Island and Delaware combined would be open to logging. That counts about 33,000 acres in Yamhill County, including at least four federally designated areas of critical environmental concern: The Butte, Walker Flat, Sheridan Peak and Yampo.

Right now, BLM is cutting trees up to the edge of volunteer-built trails along the Molalla River in Clackamas County. Trees in our favorite local outdoor areas could be next.

The motivation for WOPR appears to be economic. In 1916 when O&C Co. railroad lands went into public ownership, the federal government promised to reimburse local jurisdictions for lost revenue. Because the federal government owns more than half of Oregon land and does not pay property taxes, its commitment has been crucial here.

But in 2003, the timber industry group American Forests Resources Council sued, alleging that the Northwest Forest Plan had not appropriately considered the O&C agreement. This is how it worked: When the lawsuit was dismissed by a D.C. District Court judge, as expected, it was appealed and subsequently settled out of court.

Normally, such settlements entail give-and-take by both parties, but the Bush Administration "capitulated without a whimper," as described by the Audubon Society, and the AFRC got exactly what it wanted. Under this plan, timber production will become the dominant use of forests. The settlement actually requires that forest protections be removed before President Bush leaves office.

Oregon Rep. Peter DeFazio called the deal a "troubling sweetheart settlement."

To make it more palatable, the plan has been given a spin: Rural counties

will lose O&C revenues if the rest of the old growth isn't converted to "revenue production," i.e. clearcut. Tellingly, no mention is made of what happens to counties after the plan has been implemented and no old growth is then left to be logged. Once this land is logged, its value as habitat cannot be recovered for centuries.

If the federal government honored its commitment, as it should, the schools, libraries and sheriff's department in our county would have a sustainable funding base, just like the counties that chopped down their forests years ago.

The Northwest Forest Plan protects ancient forests, wild and scenic rivers, municipal drinking water, prized fishing and hunting grounds, as well as critical habitat for rare species and several wild salmon runs. Thus, it ended the timber wars of the 1980s and '90s. Leading conservation biologists believe that removing the BLM lands from the forest plan would violate the Endangered Species Act.

The Western Oregon revision is based on greed for timber, not science-based forest management. Its proposals unrealistically assume that no big fires such as Biscuit or the B&B Complex will again affect BLM forests. Its alternatives would revert to forest management practices of the 1980s.

To make all that clearcutting possible, BLM would have to build 1,000 miles of logging roads each decade. The timber industry would succeed in converting pristine ancient forests into monoculture tree farms, at public expense. Old-growth habitat would be irretrievably lost.

Scientists from Willamette Riverkeeper note that implementation of WOPR would inevitably result in decreased stream shade and increased water temperatures, in violation of the Clean Water Act. It also ignores the harmful effects on global warming when large, old-growth trees are lost in deforestation.

DeFazio has concluded that this "plan is no way to manage these valuable public lands." He has introduced bills directing the Forest Service and BLM to concentrate on thinning fire-prone and overstocked plantations rather than logging old-growth forests that are resistant to fire.

But the timber industry wants access to more profitable old growth, and since public sentiment won't accept that, this complicated sneak attack was formulated.

"Along with the legally required no-action alternative, (WOPR proposes) one that would spare some old-growth yet gut streamside protections; and two

alternatives that would abolish all old-growth protections and log everything, one a bit more slowly than the other," an editorial in the High Country News (Peonia, Colo.) stated. "In other words, the choices range from bad to worse to worst."

What can we do to prevent the government from welching on its promises and clearcutting old growth and destroying sensitive habitat?

The BLM has made a great show of asking for citizen input, with dozens of poorly attended presentations in McMinn- ville and other communities this fall. The deadline for written comments, which can be submitted on its website, is Jan. 11.

But in the past, public comments about clearcutting were brushed aside by government representatives as "commentary on broad issues ... not containing any specific recommendations." The recent "show" in McMinnville made it plain that we can expect no better this time. The WOPR website and paper information takes weeks to read and digest, anyway.

We must make our wishes known in Congress, where agency actions can be stopped. Congress could legislate a solution to the ongoing problem, a problem "that continues to leave our precious old-growth forests, clean water and salmon-bearing streams in jeopardy," according to the Klamath-Siskiyou Wildlands Center.

Let's not wait for stumps to dominate our public lands. Contact our congression-al delegation. Ask for legislation to make permanent the federal reimbursements to rural counties and to protect the remaining old-growth habitat on public land.

Contacts
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