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CC: Oregon Congressional delegation

Clement Stockard
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January 9, 2008

Dear BLM,

As an introduction, my name is Clement Stockard. I am a third generation Oregonian. I have lived the last 34 years on rural property adjoining BLM administered forest. I have managed my forest throughout that time, thinning, planting, harvesting and using fuel reduction practices. For over ten years in the 1970s & 1980's I was a "Forest Labor Contractor" and worked throughout the Pacific Northwest. After that I owned and ran a secondary wood product business for over a decade. Currently I am contracting wildlife surveys services in southwest Oregon. I am also a "Master Woodland Manager" certified through the OSU Extension Service. I feel I have a good overview of forest issues for our area.

In studying the WOPR, I have many concerns. It is such a vast document that covers such a large area. I find it overwhelming trying to make comments on so many issues. But, what I see is a return to the past and trying to extract as much as possible from our lands and decreasing protections to our streams and wildlife. In the following I will try to touch on a few of my concerns.

1. **Road Building.** Too many miles of new road construction are proposed. No matter how well planned they are, roads can cause multiple problems including erosion, disruption of wildlife habitat and increased OHV use. In the drainage directly behind my home the BLM built a new road for a timber sale even though it was protested as being in a steep unstable location. Even BLM engineers expressed doubts about its stability. To make a long story short, the road was built and consequently failed causing massive landslides, which resulted in thousands of dollars of damage to my property. I was forced to file a tort claim against BLM and

was finally awarded thousands of dollars to try to repair the damage. Over ten years later I still have problems related to this issue. As part of the settlement they also decommissioned that whole road to the cost of much more money (I believe the cost was around \$100,000 +). My point being that building roads in unstable areas should not be done. Other roads in that timber sale area were to be blocked off after the sale was completed but that was inadequately done and now are used frequently by OHVs and others, disrupting wildlife, dumping trash and causing vandalism. The BLM doesn't have the resources to adequately maintain their current roads, do law enforcement (poaching, drugs, resource theft), and haul out garbage and abandoned vehicles. By adding more roads these problems will only get worse. Road building should be kept to a minimum and only in stable areas.

2. **Riparian Protections.** Most if not all proposals in the WOPR decrease streamside protections. If anything they should be increased. To try to get more board feet of timber out of a sale is usually not worth the risk of all the benefits that these buffers provide. Stream buffers provide essential wildlife corridors, mitigate erosion problems from adjacent activities and help keep streams cool for fish, among other benefits. I realize it is harder to lay out sales to work around streams but there are many good reasons to keep better buffers. Maintain or increase stream buffer sizes.
3. **Old Growth Forests.** In the past few years I've become a believer in moving away from any harvesting of "old growth". It is irreplaceable in our lifetimes. There is so much acreage on previously managed lands with small diameter timber, which could provide jobs and materials. We should move our efforts there. Studies show it can be done. After the last logging the BLM did in my creek's drainage, the amount of old growth left in it is less than 5% by their estimates. It is sad to have so little left here and in so many other drainages.
4. **Social Economics.** There are proposals to prescribe what amounts to clear cutting large acreages in the WOPR. While it is easier to lay out and implement, it can be argued that there are other viable methods to go about it. I have been exposed to hundreds of these units while working in the woods, so the shock to me is a lot less than to the average general public. But to even me, when I travel on vacation to areas like Western Washington (especially the coastal area) and I see their huge and many "regeneration cuts" I am shocked. At this time I have no desire to visit that area again. I feel if we as a state are going to promote Oregon as a tourist destination that this practice especially will have a negative impact on tourism. Tourists will go to other places rather than come to Oregon to recreate if our forests are dominated by large clearcuts.

5. **Wildlife** protections under all proposals except the “no action alternative” are decreased. Where are the alternatives to give more and better lives to our native animals? If better protections aren’t offered it’s a guarantee that there will be legal delays in any alternative chosen. Retain and obey all current provisions in the “Endangered Species Act”, the “Migratory Bird Treaty Act”, the “Clean Water Act” and NEPA regulations.
6. **Fire** is a major concern of everyone. Around 40 acres of the 48 acres I own burned in the 1992 East Evans Creek Fire. It was a mix of damage. Some of the area was a total stand replacement fire while in other areas it was a beneficial under burn. The WOPR proposes to incorporate large regeneration cuts (clear-cuts) as a harvesting method. After harvesting and reforestation, these plantations are at a high fire risk for many years because of their close spacing and high flammability. While thinned larger older stands are more fire resistant. On my property where there were older trees along with areas on BLM lands with old growth characteristic forests these places survived with much less damage after the fire. More commercial and non-commercial thinning could help prevent catastrophic fires while providing timber for sale. When logging sales happened in earlier decades money to manage our forests wasn’t set aside. If timely planting and thinning was done on all harvest projects there would be much more timber available today without having to be cutting the little old growth that is left, along with having a more fire resistant landscape.
7. The use of and damage from **off highway vehicles** is expanding so rapidly and is bound to get worse as populations grow. I believe the best option is to restrict their use to defined general areas and to designated trails and roads in those areas. Unlicensed, non-street-legal vehicles should not be allowed on other public BLM roads. Under-aged operators should likewise be banned on those public roads. Adequate engine muffling system should be required to mitigate conflicts with neighboring landowners and wildlife.
8. The “**green tree retentions**” provisions that are proposed should be rejected and the number of green trees left after a harvest should be increased instead of decreasing them to fewer or none. I can’t believe a majority of BLM’s own biologists or botanists and probably their silviculturists would agree with those proposals in the WOPR.

The new plan will be in effect for 10 to 15 years. In that amount of time irreversible damage will have occurred. The O & C act states that along with timber production it also requires BLM to protect watersheds, regulate streamflow, contribute to economic stability of local communities and industries and provide recreational facilities. These are all of equal importance. What BLM is proposing does not protect watersheds it most certainly degrades them. It’s

questionable if their proposed plans help in the economic stability of Oregon when you consider tourism along with fishing, hunting and all other outdoor activities.

If we want to get timber sales developed, sold and completed we need to make them acceptable to more of the general public. If we don't, we will end up in court for years, further hurting the current timber industry. We need to look at just how to get more timber sales out by making better sales. I don't believe that the BLM administrators looked at the best-balanced options for the economics and environment when they wrote the WOPR. Maybe it was felt that if they wrote proposals that are so extreme then the public would be happy with anything more conservative than the BLM's preferred choice. I believe it should be re-looked at again and to actually listen to the public and experts, including all their own employees.

None of the alternatives would get my vote if that were allowed. The current alternatives are all unacceptable except the no-action option. I feel that the suggestions from the committee for the Jackson County Commissioners are well worth a serious look. They seemed to have a well-balanced approach from members of both the timber industry and environmental interests.

Sincerely,



Clement Stockard

CC:

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