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Bureau of Land Management, Western Oregon Plan Revisions Office
333 SW 1st Avenue, Portland, OR 97208

January 9, 2008

Re: BLM Western Oregon Plan Revisions

To the BLM,

I have read through a significant amount of your draft EIS for WOPR and also went to a WOPR open house and a town meeting that included BLM. I am writing to express my strong disappointment that BLM would put out plan revisions with 3 unacceptable alternatives to choose between. As is, your non-alternative "No Action" is the only "alternative" that is acceptable to me, but of course, it does not increase timber production. All of your alternatives increase or even emphasize logging of mature/late successional stands and none emphasize second growth thinning which is needed and which also could increase timber production in place of clearcutting "old-growth". I know you requested specifics for feedback and I'm going to give some, along with some general feedback that is crucial in all of this.

That the Bush administration would not challenge the timber industries lawsuit (re: O&C Lands Act) and just "settle" is no surprise, but the BLM could at least have produced one alternative that would not reduce "old-growth" acreage and environmental protections. The lawsuit settlement did not require the BLM to reduce "old-growth" and environmental protections. The O&C Lands Act does have some range of interpretation (as is obvious) and at your open house, BLM staff admitted this directly to me when I questioned them about BLM's view of it. The lawsuit settlement does not release the BLM from Northwest Forest Plan oversight. The O&C Lands Act also does not trump the Endangered Species Act, NEPA, or the Northwest Forest Plan, but your 3 alternatives appear to be strongly based in this view. The BLM did have the option of having an alternative that would more balance the competing laws and still not increase old-growth logging or reduce environmental protections, but your agency chose not to. The settlement only required that you provide one alternative that might reduce reserves. Why did the BLM have all 3 reduce environmental protections and reserves and increase old growth logging?

The salvage provisions in alternatives 2 & 3 are way too vague. Considering how "salvaging" has been used as a pretext in the past, it leaves a huge loophole to further reduce the mature/late successional stand (old-growth) base further. These two alternatives also do not provide for moving mature/late successional land from the Harvest land base to "protected" to make up for that lost to "salvaging". There inevitably will be fires and the salvage provisions could even encourage arsonists of a certain mindset to start them. These salvage provisions undermine the entire foundation of the draft EIS of WOPR and make it's projections a farce. I think there should be no salvage provisions for reserves/"protected old-growth" in any of the alternatives.

Your projections of tree growth out to 2106 and your assumptions of being able to create new old-growth habitat out into the future are extremely questionable. This is true especially considering they don't take into account the great unknown of how western Oregon's climate will change in the next 100 years and how that will affect tree growth. It also doesn't take into account that mature forests help create and maintain moister climates, and your reducing old-growth along with a possible hotter, drier future climate may not allow for today's young stands to ever develop into "old growth" habitat.

WOPR assumes that suitable habitat for spotted owls is a lot broader and more flexible than it actually is and it's assumptions do not have the science behind them. The science is behind spotted owls needing "old-growth" habitat and not WOPR's broader inclusions. Even given WOPR's unrealistic inclusion of habitat acres that inflate the numbers, WOPR's 3 alternatives all

result in reduced habitat in some regions. All 3 alternatives result in the spotted owl's necessary habitat, old-growth, being reduced. This is a direct threat to the species and will very likely be shown to be illegal. WOPR's projections of increasing mature/late successional stands in the future (ones that could provide real, essential habitat for spotted owls) are of course dependent on the climate not changing the equation. WOPR's old-growth logging and its disabling of the Northwest Forest Plan will likely be a recipe for extinction. Related to this issue of extinction, why specifically was your current ACEC on Wasson Creek deleted under Alternatives 2 and 3 and instead placed in the timber base? Wasson Creek contains one of the densest concentrations of spotted owls in the coast range and should not be included in the timber base in any of your alternatives.

WOPR's economic projections and assumptions are also very questionable. Our county governments do need stable sources of funding, but timber dependent money can never be a stable base. The timber industry is a boom and bust industry and current stumpage prices are very low. Your projections are based on higher prices. There is also so much opposition to old-growth logging on public lands that even when they happen, they are often held up and have additional delay costs. Until demand for lumber picks up again, the BLM's proposed harvest will add to the current "glut" and reduce stumpage prices even further.

Another factor is that WOPR would create financial damage/costs for the very same counties that WOPR/O&C funding is supposed to help. Tourism, private property values, fishing and other recreational opportunities all are damaged and result in hidden financial losses to individuals and to the counties when there is increased logging on public land. This is especially true of old-growth logging, clearcuts (under alternatives 2 & 3) and narrowed riparian zones that are proposed under WOPR. Many Oregonians live next to BLM O&C lands and will be negatively affected by WOPR. Increased erosion problems, landslides, mitigating environmental degradation, recovering wildlife/fisheries habitat and ongoing road maintenance are all added costs created by public land logging and need to be put in the equation of determining costs and benefits. BLM needs to include these costs in their EIS analysis. There are also less obvious values that WOPR should have taken into account but did not. These include storage of climate regulating carbon, preserving the remaining old-growth forests for future generations, and biodiversity protection.

I do not see the current WOPR as salvageable due to the above listed problems, along with many more I did not go into. Its proposed increase in old-growth logging and its undermining the Northwest Forest Plan ensure a huge amount of opposition and more seemingly endless quagmires and stalemate over public forests. In the process, I think the BLM has wasted a lot of taxpayer money in producing a draft EIS that is so skewed to one side. The timber industry is not owed clear-fir and peeler logs from public lands. Western Oregon counties need a much more stable base for funding than they can get from timber receipts. The BLM will not be able to solve the counties funding problems via alternative 2. The costs are way too high with it and the opposition to it, along with court challenges, would stall it from producing increased timber receipts for the counties. For the BLM to meet its obligations with the settlement and also existing laws, an acceptable WOPR EIS that increases timber production can be fashioned that is based on second growth thinning while not increasing old-growth logging.

Sincerely,
David Tvedt
David Tvedt

CC: Rep. Peter DeFazio, Senator Ron Wyden, Senator Gordon Smith and Oregon Governor Ted Kulongoski