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January 6, 2008

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Resource Advisor
Eugene District BLM
P.O. Box 10226
Eugene, OR 97440

To: BLM Resource Advisor/Wayne Elliott

I am writing to you as an individual to comment on the BLM W.O.P.R. and the Alternatives proposed.

As a Board Member-at-Large with the McKenzie River Watershed Council, I was privy to the first slide presentation on the WOPR and the 3 Alternatives that were presented to the Council in early October. During that period, Council members had the opportunity to interact with members of your staff and question them on aspects of the various options within your voluminous plan proposals and support data.

I will share with you that the McKenzie River Watershed Council is composed of many of the main various governmental and corporate agencies and public institutions that have interests or impact the McKenzie River Valley watershed, approximately 15 in all. We are a consensus organization and any action we take must have unanimous approval by all the voting members.

As a result of the presentation, we as a group drafted a three page document that highlighted concerns we had with the various Alternatives in the Plan, with specific reference to how they would impact on the McKenzie River Watershed. Because one of our institutional members could not sign off on it based on a directive of the head institutional counsel, we could not forward that document to you, although I do have a draft and would share it if you wished to see it. Or I would think Mr. Larry Six, the Executive Director of the MRWC, could make a determination about sharing if officially.

Short of providing the entire letter, it does point out four areas that need attention: riparian area management strategies would benefit from greater sensitivity to risk; the costs associated with the spread of invasive species deserve special consideration; lands currently managed as Late Successional Reserves provide critical baselines for watershed restoration projects; cumulative effects across the broader landscapes of actions on BLM lands merit analysis and discussion.

I make mention of it only because aside from those governmental organizations that had to recuse themselves from voting, the largest number of our members save one agreed

that there were shortcomings in your WOPR that needed to be addressed or changed before any endorsement could be forthcoming as a Council for any of the WOPR Alternatives.

Because we are a consensus group, we individually move to the middle to find common ground. So I want to be clear that the views I will express here are solely mine, and if I am not as accommodating in my criticisms of your Plan as more gentle criticism might be from the Council group, that is because I am speaking for myself only in this letter to you.

During the BLM slide presentation, these were some of the salient points I noted in opposition to any of the 3 Alternatives in WOPR. And I wish to be clear at the outset that I recommend the "No Alternative" option to your Plan.

These were some of the personal recommendations I made to the Council subcommittee that was chosen to draft a letter response to WOPR:

1.

Suggest the Watershed Council recommend that the riparian zone in all Alternatives remain at least as much or more than the one currently operative in the NW Forest Plan: 380-390 feet. As a Council, we have a primary responsibility to ensure healthy riparian zones, especially in the McKenzie River watershed, and should aim for the highest allowable protection under the Cautionary Principle; i.e., that if there is not unanimity or significant agreement among scientists, the least invasive option needs to be exercised as a precaution to forest and riparian zone health..

(Editorial comment: The riparian zone reduction proposed in Alternative 1 alone calls for half (50%) of the existing guidelines for a riparian zone under the Northwest Forest Plan (aka "Option 9" under the FEMAT and Clinton science panel recommendations). The current N.W. Forest Plan calls for a 380' or 390" buffer, if I understood the presenters correctly. When I asked why the change, the comment was the BLM/agency affiliated scientists determined only half that buffer was necessary, as the other half (to be eliminated) only concerned "terrestrials." When I asked, "Is something wrong with terrestrials?" The answer was negative. Another question elicited that there is no other guideline in the Alternatives that creates an ecology strip or corridor that protects those riparian zone "terrestrials" being impacted or conceivably eliminated because of the reduced riparian zone. As a watershed council, the proposed new Alternatives should not be endorsed for this alone.)

2.

The Watershed Council should request that the WOPR Plan be peer reviewed in its entirety by a panel of scientists outside the agency. This is a standard procedure for good science. As a Watershed Council, we should be insisting on good science for any proposal that impacts the McKenzie River watershed.

(Editorial comment: I asked the presenters if ANY of the science in this BLM proposal had been peer reviewed outside the agency scientists—a standard procedure for good science. The answer was negative. Peer review would conceivably include, many of the same scientists who worked on FEMAT, the 6 six agency group of scientists who developed the original options in the NW Forest Plan, and include if possible Jack Ward Thomas and Jerry Franklin.

The new BLM proposal should meet all the criteria of original Plan options: *The plan, adopted in 1994, called for an extensive system of late-successional and riparian reserves (LSR's) along with some timber harvest on the intervening lands under a set of controls and safeguards. It has proven more successful in stopping actions harmful to conservation of old-growth forests and aquatic systems than in achieving restoration goals and economic and social goals. Thomas and Franklin made three suggestions that would allow the plan to achieve its goals: (1) recognize that the Northwest Forest Plan has evolved into an integrative conservation strategy, (2) conserve old-growth trees and forests wherever they occur, and (3) manage federal forests as dynamic ecosystems.* <italics from an abstract of an article by Jack Ward Thomas and Jerry Franklin.>

Given a penchant for this current Administration to silence or attempt to silence scientists who oppose the politics of the Administration, there is reason to assume that pressure—direct or indirect-- would or could have been applied to the BLM scientists who signed off on WOPR. The compelling case of the head NASA scientist being restricted and nearly silenced for his views on global warming should be a red flag to us all.)

3.

There needs to be a clearly defined limit to the size and age of trees allowable to be cut under all of the Alternatives in WOPR. Clearly defined old growth forests need to be kept intact for forest health in the McKenzie River watershed. The amount of old growth forests left in tact should equal to or exceed in acreage those currently protected under the current NW Forest Plan

(Editorial comment: As presented by BLM staff at our meeting, Alternative 1, the most restrictive option of the three new Alternatives in terms of logging, has NO provision that limits the age or size of tree that can be cut under WOPR. That has great implications for forest health and diversity and watershed impact, two issues relevant to the McKenzie River Watershed Council. This provision or lack of needs to be clearly spelled out and some established LSR's or their new appellation under WOPR need to be kept in tact if we want healthy watersheds and healthy forests.

Giving the BLM carte blanche to log any tree of any age or size will, in my mind, clearly result potentially in all of the big trees being logged at any time. That I had to elicit this information from the presenters—that in the Alternatives there is no limit to the age or size of trees cut anywhere on their lands-- indicates to me a lack of transparency with this proposal that should not exist. It is also bad science in terms of protecting on some rotational basis the forest stands--from those recently cut to second growth stands, as I

believe the ancient forests and their gene pool of biota should be left intact for a wealth of legitimate reasons.. Were the LSR's to be logged, all the diversity that comes with mixed forest stands could be eliminated at any time without any environmental protection, thereby causing potentially irreparable harm to the riparian zones and watersheds and the flora and fauna that are part of our forest ecosystem,.)

4. The Council should ask for a more detailed elaboration of the sustainability of forest health under all the logging operations recommended in the WOPR Alternatives. What LSR's will remain in tact under these Alternatives in 5, 10, 20 years? Spelling this out in specifics as they apply to the McKenzie River watershed needs to be done if it is not spelled out in the current WOPR Plan.

(Editorial comment: I question the statement that Alternative 2, the preferred option by BLM, is sustainable for the next 200 years, as so commented by one of the BLM presenters.. This flies in the face of the conclusions by the six agency group of scientists who comprised the Forest Ecosystems Management Assessment Team ("FEMAT") in the Clinton Administration., that the proposed level of cut can be accomplished and still maintain forest and riparian health, which is or ought to be fundamental objectives of this or any other watershed council.)

(Further editorial comment in general: This proposal seems to me on a political level to be the current Bush Administration offering up the vast national heritage of our BLM forests for logging almost without restriction. The fact that this proposal has not been offered for peer reviewed to scientists outside the BLM gives a sense of a rush to get the WOPR out and passed under the current Administration. The WOPR could and likely would result in a vast number of clear cuts and tree farms and no LSR's as we currently know them, as opposed to the healthy diversity that comes from mixed stands. It can lead to a vast monoculture of tree plantations that is a far cry from a healthy ecology. The result would be irreparable damage to watersheds and riparian health in our lifetime.).

Since that initial presentation by BLM to the Council, BLM had a day-long meeting of the scientists who helped draw up the WOPR and the 3 Alternatives. One of my Board colleagues from EWEB attended that meeting and said that when pressed about peer review of the scientific assumptions upon which the WOPR was based, the BLM scientists referred to other work done in the field, new work, that also lacked the required scientific peer review. So it looks like a bunch of smoking mirrors instead of good science in your Plan, substantiating the concern that this Plan was drawn up under current Bush Administration pressure to log as much as possible, regardless of the environmental consequences. We as a country, and the BLM as a legitimate agency, deserve better, much better, than the 3 Alternatives proposed in WOPR. As Americans, we have a right to expect the stewardship of national forests to be given the highest priority and not be largesse for timber company interests counter to our best national interests.

I recently heard Paul Stamets, a mycologist working for the Homeland Security Administration, note that there is a specie of mushroom (Agarikon fomitopsis

officianalis) found only in Pacific NW old forests that contains properties against anthrax. It may be the only identified natural plant in the States to have those properties. One has to ask what is gained in terms of national interests when we put forth plans that could seriously reduced or eliminate that mushroom specie from our biota in the interest of short-term financial gains?. And this specie is but one of many that can only be found in our old forests and may have healing properties of enormous potential..

If one reads the Register Guard, he or she will find some compelling op-ed pieces from various scientists and even the former head of BLM criticizing the WOPR as scientifically and environmentally unacceptable. The newspaper itself on two occasions that I know has condemned the Plan as not meeting sound standards in its staff editorials. (From one RG editorial: To say scientists haven't embraced this plan is an understatement. Six separate peer reviews by outside researchers - five of them funded by the federal government - have agreed that the draft recovery plan wrongly downplays the importance of protecting the Northwest's remaining stands of old-growth forests.) And only today there is an article on the number of outdoor recreational groups adding their voice to the disenchantment with the Plan.

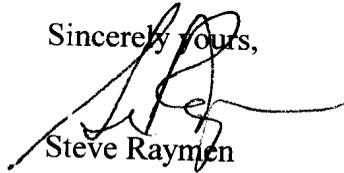
One has to ask if the problem is that not enough timber is being extracted from our public lands to meet the Northwest Forest Plan objectives, does it not make more sense to tweak the current Plan to make that happen, if it can happen and still meet sound environmental practices, rather than spend years of time and a large staff under salary to come up with 3 Alternatives, none of which comes close to meeting scientific scrutiny and all of which basically decimate the safeguards in place for the flora and fauna of our national timber lands? As it is, the entire WOPR and 3 Alternatives come across as an incredible waste of taxpayer money to develop a Plan with such little credibility and so much intended damage. It does not do BLM kindly and comes across as an insult to the intelligence.

That this WOPR Plan is presented to our populace and our politicians as a way to replace lost O&C revenues strikes me as the worst kind of attempt to manipulate and convince. We as a country and we as Oregonians can do much better. When I had an education media business, I saw the pernicious efforts of Mr. Chris Whittle and his Channel 1 Communications to install tvs, monitors and VCR's into poor school districts, but only if the school district made it compulsory for all the students to watch his morning news program, replete with candy and Coke ads and all the kinds of foods that have led to the current obesity epidemic in our schools. It set a shameful example that only now are schools addressing by canceling many of these soda pop contracts that put soda machines in the schools. The WOPR Alternatives appear no less pernicious. Let us clear cut your old forests, impact the flora and fauna without regard to good science, and in return we will give the Counties and school districts some revenue for awhile. This is a shameful, transparent display that the BLM should not be party to.

What if a Man gain the world only to lose his soul?, the Bible asks. Indeed.

Thank you for reviewing this letter recommending the No Alternative option. I sincerely hope that you and the BLM agency will see clearly that WOPR is not the way to go and we need to reevaluate our priorities and how the stewardship of the lands under our jurisdiction shall be realized..

Sincerely yours,



Steve Raymen

NB: One of the Eugene Register Guard editorials:

Owl plan doesn't fly
A Register-Guard Editorial
Published: Saturday, October 6, 2007

The Bush administration's efforts to reduce protections for the northern spotted owl in order to open Western Oregon's old growth forests to clear-cut logging have drawn well deserved allegations of political interference and tainted science by independent scientists and lawmakers from across the nation.

The administration proposes lifting restrictions on logging in 23 percent of the land now designated as critical owl habitat, arguing that spotted owls do not necessarily require large tracts of old growth forest. The draft plan for saving the owl is also based on the industry-favored premise that the invasion of the barred owl represents a more serious threat to spotted owls than habitat loss.

To say scientists haven't embraced this plan is an understatement. Six separate peer reviews by outside researchers - five of them funded by the federal government - have agreed that the draft recovery plan wrongly downplays the importance of protecting the Northwest's remaining stands of old-growth forests.

This week, 113 scientists sent a letter urging Interior Department Secretary Dirk Kempthorne to toss out the agency's draft recovery plan and replace it with one free of political manipulation. "We are greatly concerned that, according to scientific peer review recently conducted by owl experts and three of the nation's leading scientific societies, much of this science was ignored," the letter states.

The scientists also asked Kempthorne to review the owl plan to determine whether high-ranking administration officials politicized what should have been a purely scientific plan.

Given the Bush administration's record of politicizing scientific decisions, whether they involve salmon survival in the Columbia River Basin or mercury emissions from power plants, the scientists would have been better advised

to inquire which government officials messed with the science - and their respective ties to the timber industry.

Another letter to Kempthorne from 23 Democratic members of Congress was more direct and included a short list of administration officials who they believe may have politicized the plan.

Not surprisingly, they include Julie MacDonald, a former deputy assistant interior secretary, who resigned last spring amid allegations that she had intimidated and overruled scientists working on recovery plans for endangered species. MacDonald was a member of the Washington Oversight Committee, which directed the spotted owl recovery team to add an option to its draft recovery plan that would open Northwest forests to increased logging.

Others on the list include Interior Deputy Secretary Lyn Scarlett and Department of Agriculture Undersecretary Mark Rey. Scarlett is Kempthorne's top assistant, and formerly headed a California think tank that opposes government regulation, while Rey is a former timber industry lobbyist who now oversees the Forest Service.

The recovery plan is vitally important for Oregon. It lies at the heart of the administration's push to dramatically increase logging on federal Bureau of Land Management lands and to restore timber revenue to Lane County and other rural counties throughout the Northwest.

It should be clear to the administration by now that there is little chance that the draft plan will survive judicial review. By moving forward with it, the administration is missing a prime opportunity to achieve a much needed increase in timber production by means other than bringing back clear-cut logging in old-growth forests and putting the spotted owl at heightened risk of extinction.

Kempthorne should heed the concerns of scientists and lawmakers, and send this flawed plan winging back to the drawing boards. Meanwhile, he should suspend any major forest management decisions regarding BLM lands until the government produces a new recovery plan, one based on scientific evidence rather than political machinations