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1/07/08

Thank you for the opportunity to comment on the WOPR (Western Oregon Plan Revisions). I feel it is important for every citizen to be given the opportunity to comment on this management plan revision which will so dramatically impact approximately 2.6 million acres in Western Oregon.

Before my comments let me give you a brief background. I hold a MS degree in geology. Upon retirement I spent considerable time and energy in developing some understanding of forest ecosystems and the impact of human activity. I have worked with many agency employes and the Applegate Partnership as well as teaching courses on NW Forest Ecosystems for retirees through Southern Oregon Learning in Retirement (an Elderhostel-type organization).

Unfortunately, the over 1600 pages of documentation are overwhelming to the average citizen (including myself) and will cause many interested parties to conclude it is too much of a burden to add to an already busy life. Partly because of this feeling, I am limiting my comments to a) Global Climate Change, b)"Regeneration Harvests" (actually clarcutting by a new name), and c) OHV Emphasis Areas.

(The "Summary of DEIS" while reader friendly does not enable the reader to pinpoint the many flaws apparent in the details. For example the reader would not be aware of "Regeneration Harvests" or the complete disregard of "Global Climate Change".)

a) Global Climate Change

The DEIS Pg. 49, dismisses the impact of global climate change

with a short statement "*The analysis assumes no change in climate conditions, because the specific nature of region climate change over the next decades remains speculative*". The audacity of this statement is almost beyond comprehension. The amount of documentation available to support the impact of global climate change goes far beyond the 1600 pages of your document. I would mention in passing the voluminous data available from the IPCC (the most prestigious scientific panel on climate change impacts). Also, on a local level the the Impacts of Climate Variability and Change in the Pacific Northwest, JISAO/SMA Climate Impacts Group, November 1999 report pp 62-74 gives a very definitive report on the forest impacts due to various human activities including clearcutting and forest fires. These impacts have only been reinforced by numerous reports in the years following. As an example the Department of Geoscience, Oregon State University, in their December 1, 2006 newsletter has an extensive article on the impacts of climate change in the Northwest.

To fail to include the impacts of Global Climate Change in your report invalidates the basic findings and conclusions.

b) Regeneration Harvesting

It is a well known fact in most scientific circles that you cannot justify an action by renaming it. And yet this appears what the WOPR Preferred Alternative has done with the renaming of "clearcutting" as "regeneration harvesting". The impacts of "clearcutting" are well documented in scientific literature as it relates to sedimentation of watersheds and anadramous fish survival. The recent Oregonian articles of December 18, 2007 related to Weyerhaeuser and OSU Forestry practices are just the latest examples of how clearcutting is not good forest management practices. On a less scientific level I refer you to the Trees to Know in Oregon, OSU Extension Service, April 2005, pp 127 and 129 where Siskiyou mixed Conifer Forests, and Ponderosa Pine Forests management practices are discussed for the lay person.

It would appear that following the preferred alternative would in the first decade of the plan create "regeneration harvests in 12 percent of the base land (143,400 acres). It would also reduce Riparian Reserves by 57 percent (from approximately 364,000 acres to 156,000 acres). Again there is no mention of what the impact of such actions would be with impending Climate Changes. This type of harvesting is no longer acceptable in Oregon.

c) OHV Emphasis Areas

In reviewing the section related to OHV Emphasis Area, I could find no criteria listed for the selection of the proposed areas. While the B LM recognizes the problems related to compatibility with other forms of recreation (WOPR Chapter 4, page 778) it offers no solutions as to how to mitigate these problems. The proposed areas would incorporate over 100,000 acres for OHV usage and yet the percentage of citizens who are OHV owners pales in comparison to the other outdoor people who use BLM lands. Also the proposal, while admitting the problem of OHV environmental damage, does not outline how these problems would be handled. Given the past record of enforcement and habitat damage by OHV user's it is unrealistic to claim "intensive management" will be the answer. While there may be a place for an OHV Emphasis Area in the future, the current proposal is long on wishful thinking and short on concrete solutions. Much more research is needed concerning the impact of OHV's on the landscape before an additional 100,000 acres should be proposed (if ever).

<u>BLM Philosophy:</u>

While there is no such section in the WOPR it seems that there is a need to approach the proposal from a philosophical aspect. Currently many Counties in Oregon are feeling the affects of loss of timber revenue which was easily available during the "harvest years". Part of this is due to a lack of foresight and a wish to return to the

"good old days". Unfortunately, there is no quick fix based on a comprehensive review of timber resources, a changing economy (many counties have shown growth of average median income, without the timber harvests) and incorporating such factors as Global Climate Change, timber prices and the changing demography of the counties. It is doubtful that the WOPR will even become a reality because ot the multitude of of federal environmental laws that were the result of poor timber management procedures (e.g.. National Cleanwater Act, National Environmental Policy Act, Endangered Species Act, just to name a few.) Rather than attempt to go back to the ways of the past, it is time to begin the process of forming coalitions of timber people, environmental activists, and common citizens to build a future that will protect our resources while providing renewable resources. There have been good examples of coalitions, such as the Lakeview group which are leading the way in creating compatible solutions to the timber problem. The current BLM "WOPR" proposal is unfortunately a step backwards rather than a step forward.

Sincerely,

James F. Moore Jr.

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