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Director (630), Bureau of Land Management,
U.S. Department of the Interior,
1849 C Street, N.W., Room 2134LM,
Washington, DC 20240, Attention: 1004-AE39
April 19, 2016
Dear Director:

Umpqua Watersheds, Inc. (UW) is a very nearly all-volunteer conservation, restoration, education and out reach environmental advocacy 501c3 non-profit, headquartered in Roseburg, Oregon.

UW commends the Planning 2.0 Team for its proposed beneficial modifications to the current BLM planning process. That *“The public would be provided opportunities to submit data and information and to review preliminary versions of key planning documents including a preliminary statement of purpose and need, preliminary alternatives and their rationale, and preliminary procedures, assumptions, and indicators to be used in the effects analysis.”* is, of course highly commendable, especially if it allows for the input, by independent, non-BLM sources, of important and up to date scientific and other data.

Problems with “Sustained” Yield As Opposed to Environmentally Sustainable Management

*“Reaffirmation of FLPMA Policy. The proposed rule would reaffirm the policy guidance in FLPMA requiring management of the public lands for multiple use and sustained yield and includes a definition of the concept of sustained yield emphasizing this tenet of public land management.”*¹

We note the mention of "sustained" yield in the fact sheet for Planning 2.0 forwarded to us. Please be aware that, without doubt, it was a misguided and sustained adherence, by the BLM (and the U.S.F.S.) to the “sustained” yield harvest/management model that played such a large part, for decades, in the liquidation of primary old growth/mature forest and the subsequent listing of threatened species in the Pacific Northwest Region, including in Western Oregon. We urge the BLM to recall that the term "sustained" should never have been, and should not now, yet again, become confused in planners' minds with a modifier of a very different meaning: "sustainable."

Concerning Landscape Level Planning

We remain particularly concerned with how the BLM relates to the adjoining private industrial timber lands in Western Oregon. BLM appears, to us, to be in denial about the deleterious impacts imposed on public forest lands by these clear cut, monoculture fiber farm, herbicide soaked, simplified (i.e., biodiversity-poor) private holdings, whereon that very "sustained" yield management paradigm referenced above, is still imposed upon the watersheds of Western Oregon, with abandon.

BLM gives the impression, in its current management and planning activities, that it exists alone on

1 Fact Sheet: BLM’s Proposed Planning Rule, p. 2

these watersheds and, thereby, need not consider the cumulative impacts of its management actions in combination with the vast clear cut sections on neighboring private lands in this, the infamous and most regrettable Western Oregon “checkerboard.” UW strongly recommends that Planning 2.0 fully account for the lasting and cascading effects of its own (as well as all other) past over extraction of primary old growth/mature forest across Western Oregon's many impaired watersheds. That is, UW insists that any overarching planning adjustments require regional BLM and districts in Western Oregon to fully consider the cumulative impacts imposed upon watershed health and high functioning across the “checkerboard” of private/public ownerships, landscape wide. And, to fully account for the several environmentally damaging harvest, road building, herbicide, monoculture plantation practices currently conducted on private industrial timber lands adjacent and proximate to public lands, under aegis of the Oregon Forest Practices Act. With this historic and current context in mind, BLM must adjust its planning and management proposals accordingly.

Further, BLM (as well as the U.S.F.S.), as a payer of the Oregon Forest Products Harvest Tax (OFPHT), does not speak up to protest the several and severe negative impacts imposed upon its public land holdings by the very retrograde harvest practices allowed under aegis of the Oregon Forest Practices Act (OFPA). To our mind, this silence does nothing to fulfill the sacred trust conferred on BLM by all of the citizens of the United States, in whose larger interest and for whose benefit, BLM manages these Oregon forest lands. In UW's view, the fact that BLM (along with the Forest Service) is dunned for this state harvest tax (currently assessed at about 0.05%/mbf) implies both a right and an obligation to provide the Oregon Board of Forestry with its objections to the outdated and very harmful "sustained" yield paradigm, as it is currently practiced on adjoining and proximate private sections within the infamous Oregon "checkerboard." That is, vis a vis how those private land practices negatively impact these public lands and concomitantly impose unacceptable limits upon BLM management/conservation/restoration options.

It is notable, that several millions of dollars from the OFPHT have been subverted over the years to produce televised and highly misleading propaganda advertisements on behalf of Oregon's industrial timber industry, as currently “regulated” by the environmentally destructive “sustained” yield parameters of the OFPA. Impacts from this retrograde law on public lands administered by the BLM in Western Oregon are significant. Private land harvests conducted under aegis of the OFPA negatively affect water quality, connectivity, sustenance and recovery of threatened and endangered species, climate change mitigation via carbon sequestration, etc. Adding insult to injury, over-spray and runoff from intense aerial application of a suite of increasingly toxic herbicides (e.g., Atrazine, 2, 4-D, Glyphosate, Imazapyr et al.), often applied in “witches brew” combinations with unknown synergistic effects, imposes toxic inputs upon the flora and fauna resident on these public forest lands, while also potentially harming human beings recreating or working on these same public lands within the infamous “checkerboard.”

Concerning the “Unholy” Alliance of O & C County Governments With the Industrial Timber Industry In Oregon

As a practical matter, O & C county governments largely stand against sustainable management of public lands and regularly advocate for their sustained yield management, thus too often placing them in direct opposition to groups such as U W and those individual citizens, who would conserve and restore the priceless, and put-upon, watersheds of Western Oregon. These O&C County Commissioners incessantly clamor for greatly increased, environmentally damaging extractive levels from BLM holdings. This crass advocacy, continuously indulged in regardless of likely environmental

consequences, ignores the deleterious impacts of past gross over-harvest of primary forest; this, so as to once again overflow county coffers with the ready cash made available by the vastly overindulgent public land timber harvest receipts of past decades.

In the same breath, many of these identical county commissioners continue to acquiesce in the fact that, since about the year 2000, large private timberland owners in Oregon (i.e. >5,000 acres) no longer pay accustomed harvest taxes (e.g., yield, severance), but rather a very minimal ad valorem property tax and the very minimal and previously discussed OFPHT. This lamentable, legislatively created (and legislatively correctable) revenue condition has resulted in a falling off of once accustomed harvest taxes available to the State of Oregon for redistribution to county governments of many tens of millions of dollars over the course of the past fifteen or so years. Thus are public forest lands under BLM management made responsible for most (if not all) environmental conservation, restoration, biodiversity, carbon sequestration burdens etc. in the checkerboard arrangement of alternating public and private lands. Likewise, they are tasked with supplying, by far, the lion's share of operating revenue for county governments, when compared with harvest revenue contributions from large private timber land owners (i.e., >5,000 acres).

It is also interesting, and noteworthy, to mark the close electoral relationship that too often exists between O&C County Commissioners and the private timber industry in Western Oregon, and thus county governance. That is, an examination of the public records that list campaign contributions by individuals and corporations toward commissioner election campaigns often reveals significant direct donations of relatively large amounts of cash to commissioner election campaigns by corporate and individual members of Oregon's private industrial timber industry; indeed, the very industry that champions and participates in the repeated imposition, upon our already badly degraded watersheds, of countless very large clear cuts that include minimal to nonexistent riparian protections, the aerial application of increasingly toxic herbicides (often in multiple combination with unknown resultant synergistic effects) and the monoculture restocking of these clear cut lands (i.e., sustained yield management). In short, that same private industrial timber industry is often in close and coordinated (if unofficial) association with many of Western Oregon's Boards of County Commissioners.

Proposed Truncation Of Comment Period

We understood, from our participation in the March 21st webinar, that BLM proposes, in this planning 2.0 update, to reduce from the current 90 to 60 days the time allowed for comment on such regional planning documents as the d.e.i.s. for RMPs (aka WOPRsr., WOPRjr.). For UW, as for other hard-pressed conservation individuals and organizations, in Oregon at least, this truncation of the period for public input is unacceptable. Here is why.

In its stated reaffirmation of FLPMA policy, and as outlined during the webinar, Cooperating Agencies (CA) will continue to include county governments, if they agree to the confidentiality and other parameters current in law and policy. (That has certainly been the case with the just-released WOPRjr.) As related above, here in Western Oregon, individuals and groups advocating for conservation and restoration of public lands managed by the BLM are often at direct odds with county commissioners. The Association of O&C Counties align themselves, often seamlessly, with the perceived needs and self serving demands of the industrial timberland owners of large acreages (i.e., >5,000 acres). That these counties, which are in agreement with the required FLPMA parameters, have prior access to data and planning proposals to which environmentally motivated individuals and groups, by law, do not, represents a de facto disadvantage for the latter. (In this regard, it may be useful to note that the

Association of O&C Counties has been hard at work gathering scarce local taxpayer funds in anticipation of filing suit, in Federal Court, against the BLM and the DOI over its latest, just-released RMP for Western Oregon! These county government level enablers/promoters of the “sustained” yield industrial timber industry engaged what is reported to be the most expensive law firm in the state to prepare this suit, well before the final RMP was made public. This represents a clear indication of the use the potential advantage of prior knowledge may afford local elected county governing bodies granted CA status. By extension and in view of the close relationship between the O&C County Commissioners and the industrial timber industry, that advantage potentially obtains, if indirectly, to the latter, as well.)

In the cases of the WOPR (withdrawn by DOI in 2009) and the current proposed RMP (aka WOPRjr.), our organization was confronted with many hundreds of pages of data and proposals in several volumes for our consideration and comment. The release of these volumes was both preceded and followed by many public meetings, presentations of alternatives, etc. To digest such voluminous information, as you may well imagine, is a daunting task for such an all-volunteer non-profit as ours. In the case of the latest D.E.I.S. for BLM lands in Western Oregon (aka WOPRjr.), along with other individuals and groups, UW requested and was granted an extension to 120 days of the usual 90 day comment period. This was hardly enough, but we made the best of it.

The Association of O&C Counties, in contrast, had (and has) access to taxpayer funds that allow them to hire expensive attorneys, and other experts, to help them formulate their positions. This allows these local governments, individually and in association, to leverage their exclusive access to preliminary data and proposals, potentially to their great advantage. And their position, in every case, is to drastically increase the extractive volume of timber over current levels. In other words, to return public forest land management to that very “sustained” yield model that so myopically extirpated much more than was ever sustainable, of the primary old growth and mature forest that once graced and benefited vast areas of the Oregon Coast and Cascade Ranges, in the decades between the end of WWII and the advent of the Northwest Forest Plan.

UW mentions these regrettable conditions (indeed, they comprise a significant portion of the historical context, which surrounds all BLM planning efforts in Oregon) so as to underline the built-in imbalance currently existing in BLM regional planning efforts, vis a vis enabling true public input and citizen empowerment therein. Oregon's all and/or largely volunteer conservation organizations already find themselves at a distinct and significant disadvantage when it comes to effectively influencing BLM's regional planning efforts in Western Oregon. Thus it follows that, in fairness and in the interest of the conservation and eventual restoration of our damaged watersheds, and in consideration of that sacred trust underlying all BLM management activities on public forest lands in Oregon and elsewhere, comment periods (as perhaps protest/objection periods too) need to be extended and not reduced in duration!

Sincerely,

Joseph Patrick Quinn