



Joseph Patrick Quinn
Volunteer Conservation Chair,
Umpqua Watersheds, Inc.
P.O. Box 101
Roseburg, OR, 97470
541 672 7065
uw@umpquawatersheds.org

Michael J. Korn, Field Manager
Swiftwater Field Office
BLM Roseburg District
777 NW Garden Valley Blvd
Roseburg OR, 97471
11/27/18

Dear Mike Korn:

Please accept this limited Protest, from Umpqua Watersheds, Inc., of the Kernel Klink Timber Sale, a portion of the Third Rock Harvest Plan EA (**DOI-BLM-ORWA-R040-2014-0014-EA**). Umpqua Watersheds, Inc. (UW) is a 501 C 3 non-profit conservation, restoration, education organization, with offices in Roseburg, Oregon.

PROTEST POINTS

- 1) Failure, by the BLM, to include the mandates, of the 1937 O&C Act, to protect watersheds, regulate streamflow and provide for recreation in its purpose and need statement for the Kernel Klink Timber Sale.
- 2) Repeated references made by BLM to the 2016 PRMP/FEIS and the 2016 NCO ROD/RMP, in Appendix B, of the Kernel Klink Timber Sale Decision Record, in response to issues raised by UW in its EA Comments; these references presented to NEPA participants without accompanying citation of volume number, page number or any other useful source reference in those documents.
- 3) Failure of the BLM to clearly and directly discover and disclose the environmental condition, terrestrial and aquatic, flora and fauna, of the adjoining and proximate private industrial timberlands in the Third Rock Analysis Area, in general and those of the Kernel Klink T.S., in particular.
- 4) Failure by the BLM to discover and disclose the current dismal nesting/reproduction data for the NSO, in the Kernel Klink Timber Sale Decision Record.
- 5) Lack of useful data for intervening private industrial timberlands as they relate to a strongly inferred and chronically depleted low summer flow condition, as well as opinions wrongly presented as

fact regarding this same condition as discovered and disclosed by the Perry-Jones Study.

6) Failure, to date, of the BLM to address the issue of onrushing, anthropocentrically caused climate change in a serious and effective manner.

7) Roads

Protest Point #1: Failure, by the BLM, to include the mandates, of the 1937 O&C Act, to protect watersheds, regulate streamflow and provide for recreation in its purpose and need statement for the Kernel Klink Timber Sale

In its comments on the Third Rock Harvest Plan EA, UW provided BLM with primary historic source material¹, researched, collated and presented by a BLM employee, in 2005. This material was clearly indicative of the critical importance, accorded by a principal author of the 1937 O&C Act, to the environmental constraints imposed upon the management of the O&C, from the inception of the Act. (Please see UW comments on the Third Rock Harvest Plan EA, pages 1-3.)

Rather than reflect and comment upon this source material in its response to UW, RBBLM offered the following: “*Previous court cases as well as the case to amend the 1995 RMP have stated the O&C Act's main use statute is for sustained-yield timber production. As such, 'managing O&C lands pursuant to sustained-yield principles by definition protects watersheds, regulates stream flows and contributes to the economic stability of surrounding communities.'* In addition, the 2016 NCO ROD/RMP contains protections to maintain and/or improve watersheds, water quality and stream flow.”² (emphasis, UW)

The above preposterous and clearly inaccurate claim that *...managing O&C lands pursuant to sustained-yield principles by definition protects watersheds, regulates stream flows...* would be laughable had the imposition of sustained yield (as that nebulous paradigm was so nefariously and wantonly **and unsustainably** imposed, across all ownerships, upon the shared landscapes of the O&C in the decades preceding adoption of the NWFP) not left such a lamentable legacy of degraded streamflows, diminished or extirpated species, aquatic and terrestrial etc., on the shared ownerships of those very landscapes. That there occurred a vast liquidation of primary old growth and mature forest, and its subsequent conversion, in so many instances to monoculture Douglas Fir plantations, for decades across all ownerships in the name of “sustained yield” is an incontrovertible fact. Indeed, as incontrovertible as the environmentally damaging consequences flowing from that poorly understood, ill-considered application of the sustained yield management paradigm; a model, which while it was certainly sustained for decades, was, in the end, hardly sustainable.

As we have stated numerous times before, in our various NEPA submissions to the BLM, such deeply damaging and far reaching ecological consequences were made irrefutably obvious, *ipso facto*, by the immediate necessity of applying the remedial strictures of the ESA, NWFP, Clean Water Act etc. to these very same landscapes and their badly degraded watersheds. In the event, we are not laughing, rather we are dismayed by an agency attitude that appears to have the temerity to offer such a poorly considered, nearly flippant, response to our very serious and well documented comment. In part, that dismay and subsequent environmental distress prompts our including the above comment/response in our first point of protest, and we do protest it.

¹ Price, Frank N., 2005, Protecting Watersheds, Regulating Stream Flow, and Providing Recreational Facilities: The Intent of this Language in the O & C Act, Early Interpretation and Historic Context.

² Kernel Klink Timber Sale Decision Document, Appendix B, page B-3, Comment #12

Protest Point #2: Repeated references made by BLM to the 2016 PRMP/FEIS and the 2016 NCO ROD/RMP, in Appendix B, of the Kernel Klink Timber Sale Decision Record, in response to issues raised by UW in its EA Comments; these references presented to NEPA participants without accompanying citation of volume number, page number or any other useful source reference in those documents.

These off hand referrals to management documents lack footnotes or other means of pointing NEPA participants to the appropriate sources of the references made by BLM in its responses to UW's comments/issues in Appendix B of the Kernel Klink Decision Record. Such unsupported statements, in our estimation, are of limited value to NEPA participants, for verifying the accuracy and/or relevance of claims made by RBBLM in its responses to the important, even critical, issues presented, in good faith, by Umpqua Watersheds. Indeed, some less kind might characterize these generalized responses as being more like bluster than credible replies. For its part, UW is of the opinion that such off hand responses will not do for the NEPA process and thus we protest them. [Examples of the very general references, when any are made at all, to "other ownerships" in the DEIS RMP (aka WOPRjr.) are listed in the bullets below, under Protest Point #3.]

Protest Point #3: Failure of the BLM to clearly and directly discover and disclose the environmental condition, terrestrial and aquatic, flora and fauna, of the adjoining and proximate private industrial timberlands in the Third Rock Analysis Area, in general and those of the Kernel Klink T.S., in particular.

Again on page B-3 of Appendix B, part of the Kernel Klink Timber Sale Decision Record, under comment #13 we read the following under the comment/issue heading: "*The BLM must acknowledge activities and conditions of private lands and their cumulative impacts 'before any definitive claims can be credibly made concerning the impacts, for better or for worse, of extractive activities on the adjoining and proximate public forestlands of this analysis area under management authority of the BLM.' Where in Third Rock EA are private land activities 'fully discovered and disclosed' as part of the cumulative effects analysis?*"

BLM's response: "*The PRMP FEIS considered activities on private lands in the analysis. Activities proposed for the Third Rock Harvest plan are consistent with direction in the NCO ROD/RMP and are within the effects described in the PRP FEIS.*"

For its part, UW reviewed all four volumes of the Draft Resource Management Plan/Environmental Impact Statement as well as the Northwestern & Coastal and Southwestern Oregon RODs and RMPs and failed to find much that was specific by way of useful data concerning the actual, current environmental condition of the adjoining and proximate private industrial timberlands mentioned above. Follows what we did discover in those volumes:

- On page 90 of Vol. I of the DEIS/RMP figure 3-9 shows a pie chart showing percentages of land ownership within the planning area.
- Regarding consideration of the past liquidation of primary forest, in Volume #1 of the same DEIS, on page 94, we read the following: "*Use of information on the effects of past actions may be valuable in two ways according to the Council on Environmental Quality guidance: for consideration of the proposed action's **cumulative** effects and as a basis for identifying the*

proposed action's direct and indirect effects.” (emphasis UW)

- Further down page 94, we read: “*Scoping for this project did not identify any need to list individual past actions nor to analyze, compare or describe environmental effects of individual past actions in order to complete an analysis that would be useful for illuminating or predicting the effects of the proposed action.*” Indeed, forget listing individual actions, insofar as we were able to determine, BLM did not waste any ink even listing **aggregations** of **past** clear and partial cutting of primary o.g./mature forest on the land it manages, either, let alone on the vast adjoining and proximate private timberlands in the checkerboard. If memory serves, there may have been some discussion of this in the Scoping volume for WOPR sr. Perhaps, but where are the tables discovering and disclosing the accumulated acreage of these clear cut acres, and their subsequent conversion to monoculture plantations, in the deis or in the final decision document? More to the point, where is this data discovered and disclosed in either the Third Rock Harvest Plan EA, or in the Decision Document for the Kernel Klink T.S.?
- Regarding current and future conditions on the intervening private, on page 95 of the DEIS, this is all we get: “*The BLM based these assumptions about future management on other ownerships on existing plans or current trends, and these assumptions are broad and general in nature. However, the broad assumptions are sufficient to provide context for evaluating the incremental effect of the alternatives.*” This is a “hard look?” Obviously it is not. The result of this flimflammy is that currently under the new RMP (as sometimes under the '95 ROD), BLM sites regens smack dab in the middle of large private clear cuts and very young monoculture fiber farm plantations. But, not to worry, says BLM, we have considered this context and there will be no harmful impacts resultant from introducing our own relatively large canopy openings into such a condition. A condition, on so very many of the watersheds of Southwestern Oregon, that is very badly degraded before BLM regens a single stem.
- Again, in Vol. #1 of the DEIS, on page 139, Figure 3-25 provides a pie chart (“A”) showing percentages of estimated greenhouse gas (ghg) emissions from harvest operations. While at least some very general accounting is thus provided, this one pie chart hardly constitutes and in depth or “hard” look at such an existential issue as carbon-sequestration etc vis a vis climate change. (See Protest Point #7, below.)
- In the roughly 50 pages of the Forest Management Section of Vol. 1 of the DEIS, UW found only one reference to private timberlands, Figure 3-59 on page 238 showing extractive levels, for BLM, USFS, State and Private from 1962-2008. On page 359, Figure 3-60 shows bar graphs delineating 10-year age classes on BLM. There is no comparable graph delineating the same for the vast acreage of the private industrial timberlands, which are, it goes without saying, the actual spatial context for the BLM lands in the checkerboard of alternating ownerships.
- Regarding data concerned with intermittent and perennial stream miles on the WOPRjr. Analysis Area, we do find Table 3-71, on page 290 of the same Vol. 1 of the DEIS. Tellingly, without specifying other ownerships, it reveals what a relatively small portion of each category is managed by the BLM in Western Oregon. We use the word “tellingly” because of its obvious implication of the importance of an all ownerships analysis of the landscapes and their

watersheds at play here. In and of itself, this table underlines the limited value of discovering and disclosing only the relevant environmental data extant on the public lands managed by the BLM and not the vast holdings of the intervening private ownerships.

- In the Hydrology Section of the DEIS RMP, there is no mention made that we were able to discover, of low summer streamflow on the analysis area. However, regarding non-BLM ownerships, we read the following on page 300 of Vol. #1 of the DEIS RMP: *“Second, the BLM used change detection methods rather than rule set described in Step 3 in the Planning Criteria to calculate the early-successional forest on non-BLM-administered lands. Using the Landscape, Ecology, Modeling, Mapping, and Analysis (LEMMA) satellite imagery and vegetation classification the BLM identified new regeneration harvest areas on non-BLM-administered lands for the base period with available imagery, 1996 to 2006, for each identified rain-on-snow subwatershed. The BLM projected this rate of regeneration harvest forward in 10-year increments for 50 years.”* So, if BLM was able to accomplish this analysis for “rain-on-snow” forestlands, why not use the same or comparable methods to discover and disclose relevant stand age and other data, whether credibly estimated or actual, to provide NEPA participants with the necessary spatial context parameters on the vast, intervening private industrial timberlands of Western Oregon, of the Third Rock Area in general, and of the Kernel Klink Timber Sale vicinity, in particular? In the event, insofar as UW was able to discover, this is about as detailed as BLM gets in such private land disclosure in any of the documents made available to we citizen volunteers that we have seen.
- Regarding all ownership road miles, within fine sediment delivery range only, discovered and disclosed in the analysis area for WOPRjr., we do find Table 3-72, on page 314 of Vol. #1 of the same DEIS RMP. Nice to see a few numbers at long last, however general they may be. Again, as with table 3-71, the lopsided balance here is indicative of the importance of discovering and disclosing road miles on private industrial timberlands and their condition.
- Regarding Comment/Issue #18 and the Response offered UW's comment: lacking specific volume and page references, we were unable to verify the extent and validity of the assertion that activities and roads on private lands were analyzed in the PRMP FEIS. Perhaps, given the many pages in four volumes of the d.e.i.s. and the two volumes of the decision record, we may have overlooked that data. Thus again, to be the most useful, references need to be more specific. (Also, please see protest point #7, Roads, below.)

Finally, regarding discovery and disclosure of stand age conditions on the vast adjoining and proximate private industrial timberlands on the Third Rock Harvest Plan analysis area in general, as on the Kernel Klink T.S. vicinity, in particular, we ask: where in the EA for Third Rock or the Decision Record for Kernel Klink, are comparable data rich tables, such as **Table 3-2**, labeled **Current Forest Stand Attributes** (and which relate to BLM holdings only)³ to be found? Since these vast private industrial timberlands, managed under aegis of the retrograde OFPA, form the actual spatial context for the public lands thereon, managed by RBBLM, lacking such crucial data, how on earth are citizen-volunteer NEPA participants, let alone agency personnel responsible for making management decisions of the highest scientific standards on these watersheds, supposed to proceed in a well informed and effective manner? Answer: lacking such discovery and disclosure, they cannot. Thus, UW's protest point #3.

³ Third Rock Harvest Plan EA, Pg. 21

Protest Point #4: Failure by the BLM to discover and disclose the current dismal nesting/reproduction data for the NSO, in the Kernel Klink Timber Sale Decision Record.

It has come to our attention that nesting/reproduction success for the NSO on the public lands managed by the Swiftwater Field Office has been a virtual failure for this year 2018! If we understand correctly, the same is true for the Oregon Coast Range, Southern Cascades, H.J. Andrews and other areas. Why was this important information not declared in the Kernel Klink Decision Record? Given that the public lands encompassing this timber sale are listed as critical by the USFWS, this dismal fact, accurate insofar as we have been able to determine on our own, most certainly should have been disclosed. And just as surely, extractive actions on this critical habitat ought to have been reexamined in light of this nesting/reproductive collapse. It was not and that is further cause for this protest.

In that vein, we quote from UW's EA comments, thus: *“Here is how BLM itself assesses impacts to the Harrington occupied nest site, one of only two on this analysis area: “The most substantial loss of dispersal-only habitat would occur within three core-use areas; regeneration harvest would remove 51 percent (74 of 145 acres), 61 percent (17 of 28 acres), and 73 percent (11 of 15 acres) within the Harrington Tribe, Lower Stoney Creek, and Pond View core-use areas, respectively (Table 3-9). Removal of dispersal-only habitat would reduce the amount of habitat available to facilitate movement between stands of NRF habitat in these habitat-limited core-use areas. As a result, these stands would no longer be available for NSO movement and dispersal between patches of NRF habitat within the analysis area. Dispersal function is not expected to return for approximately 40 years, when the stands reach a canopy cover of 40 percent or greater and an average diameter at breast height (DBH) of 11 inches or greater (Thomas et al. 1990).”⁴ (emphasis, UW) Recovery in 40 years, you say? Cavalier, indeed!⁵*

In its response to comment #15, on page B-4 of Appendix B of the Kernel Klink Decision Record, regarding the lack of NSO data in the Third Rock EA for the intervening private industrial lands, as cited by UW in its comments (page 8) on the Third Rock Harvest Plan EA, BLM responds as follows: *“The PRMP FEIS considered activities on private lands and the effects to NSO in the analysis.”* It did? Since no reference is made to volume or page number, figure or table in this response, we remain doubtful, rightly or wrongly, about the accuracy of this claim. (We have already protested this lack of proper document citation in protest point #2, above.) Given the dismal nesting/reproduction record for 2018, that skepticism begins to assume existential proportions, insofar as the continued persistence of this gravely threatened species is concerned.

Protest Point #5: Lack of useful data for intervening private industrial timberlands as they relate to a strongly inferred and chronically depleted low summer flow condition, as well as opinions wrongly presented as fact, etc. regarding this same condition as discovered and disclosed by the Perry-Jones Study.

In its comments on the Third Rock Harvest Plan EA, UW offered this quote from that EA followed by UW's own subsequent observation: *“The BLM's ecologically based forest management practices are unlike private industrial forest practices and the BLM's practices minimize streamflow changes.”⁶ in*

⁴ Third Rock Harvest Plan EA, Pg. 40

⁵ UW comments, Third Rock Harvest Plan EA, pp. 8, 9

⁶ Third Rock Harvest Plan EA, App. C, Pg. 95

*no way satisfies the “hard look” requirement made both by NEPA and the parameters of responsible management of the public's forested watersheds.”*⁷ UW stands by this statement and includes it as part of this protest point.

In response #14 on page B-3 of Appendix B of the Kernel Klink Decision Record, BLM offers the following: *“Streamflow is based on the 2016 PRMP/FEIS analysis. The detailed analysis included multiple aspects that affect streamflow including stand age and timing of hydrologic recovery, harvest intensity, stream periodicity, harvest practice, stream buffers and riparian reserves and watershed content.”* It does? Precisely where and what ownerships does this information cover? Or is it only germane to the public lands under management authority of the BLM? Without proper citation, how are we or any other NEPA participants to answer that question, and/or verify either the validity and applicability of this claim?

On pages 93 to 96 of the Third Rock Harvest Plan EA, we see the parameters quoted above (stand age and timing of hydrologic recovery, harvest intensity, stream periodicity, harvest practice, stream buffers and riparian reserves and watershed content) repeated and examined, at some length. Claims are made for progression of stand age away from those cited by Perry-Jones as having the most influence on low summer flows, for hydrologic recovery etc. *“Perry and Jones (2016) do not give an estimate of years to low flow hydrologic recovery, but Perry (2007, p. 102) does mention, based on limited information, that stand-level transpiration may return to near old-growth levels by 130 years in Douglas-fir dominated stands at which point the stands and associated stream networks may be considered hydrologically recovered.”*⁸ 130 years certainly seems to be wishful thinking when one considers the short (and shortening) clear cut rotations currently practiced on the vast adjoining and proximate private industrial timberlands of this analysis area. As well, when one considers the ubiquity of early seral and nearly mid seral stands on the Third Rock analysis area, across all ownerships, and the obvious paucity of mature and late seral stands thereon, again across all ownerships. At the same time, the imminence of large industrial clear cuts on sections adjacent and proximate to the public lands of Third Rock must be factored into this NSO analysis as well. It has not been and thus this protest point.⁹

In point of fact, other than this disclaimer: *“The BLM assumes that the age class distribution on private industrial forest land will be perpetuated, indicating regular and predictable cycles of low flow surplus and deficit according to information in Perry and Jones (2016).”*¹⁰ not much is discovered or declared for the benefit of agency personnel and NEPA process participants, concerning private land stand age conditions. Assumes, you say?

And, for the NEPA record, please tell us where such a claim, for the intervening private industrial lands, concerning predictable cycles of low flow surplus and deficit are made in Perry-Jones. It seems to UW, that for such a statement to enjoy much, if any, credibility, BLM would need to have prior scheduling knowledge of private industrial clear cutting and subsequent heavy plantation restocking with monoculture Douglas Fir; this schedule driven, as ever, by unpredictable market forces. The possible expression, via extractive management, of such external forces, it must be said, is hardly comparable to the kind of useful and relevant stand age consideration disclosed by BLM in its decadal figures (e.g., DRMP/EIS, Vol. I, Figure 3-30, page 239), age class distribution tables (e.g., DRMP/EIS,

⁷ See UW comments, Third Rock Harvest Plan EA, pp. 9-11

⁸ Third Rock Harvest Plan EA, App. C, page 92

⁹ See UW comments, Third Rock Harvest Plan EA, pp. 3, 4.

¹⁰ Third Rock Harvest Plan EA, App. C, page 93

Vol. I, Table 3-55, page 240) etc, for the public lands under its management authority. Indeed, most if not all of the aforementioned hydrological parameters discussed in the EA, pages 93 to 96, are most emphatically not related by BLM to management, conducted under aegis of the environmentally retrograde OFPA, on the proximate and adjoining private industrial timberlands of the Third Rock analysis area, in the Kernel Klink T.S. vicinity or anywhere else on the infamous and most unfortunate checkerboard of alternating ownerships, that we know of.

And that leads us to comment #17, which states the following, on page B-4 of Appendix B of the Kernel Klink Decision Record: “*The BLM is attempting to use the presently degraded low summer flow, chronic in our estimation, as the base line from which to gauge the impact of its management proposals.*” The “non-response response” #17, made to UW's above assertion: “*In conducting analysis for the Third Rock Harvest Plan EA, the existing condition was used in determining effects to streamflow and other resources.*” is effectively worthless, if one is trying to determine whether or not this and other similarly impacted watersheds are indeed experiencing the kind of chronically depleted low summer streamflows so strongly inferred by the Perry-Jones Study. Indeed, UW protests this example of unresponsive circular reasoning as unworthy of a NEPA document, because, of course, there is nothing in such an illogical scheme (i.e., “*...the existing condition was used in determining effects to streamflow and other resources.*”) with which to compare current streamflow or anything else, temporally speaking at least. **That is, historical flow data is not even considered and, after all, it is precisely a decline from that historic summer streamflow rate which preceded the liquidation of primary old growth/mature forest on these watersheds, and its subsequent and wide spread conversion to monoculture Douglas Fir plantations across all ownerships with which the Perry-Jones Study, as well as UW's EA comments and this protest have been, and are still, to a significant extent, concerned.**

Again, for emphasis: as posited by UW in numerous other NEPA submissions to RBBLM: discovery and disclosure of, then subsequent comparison with, actual historic streamflow data or credible modeling, where such data is lacking, is the only way we can see to arrive at a verifiably useful conclusion regarding the inference of a chronically depleted summer flow regime. After all, garden variety common sense strongly indicates that comparing same to same, temporally speaking, is no real comparison at all.

Regarding the comment/response #16, on page B-4 of Appendix B of the Kernel Klink Decision Record, we refer BLM to pages 12-14, the Hydrology section, of UW's timely submitted comments on the Third Rock Harvest Plan EA.

Finally, we draw BLM's attention to the most worrisome fact that here, near the end of November, 2018, rivers and their tributaries in the Umpqua Basin, the Coquille and beyond are experiencing drastically diminished flow regimes, very nearly the rates one might well expect them to have at the end of a typically dry summer. While it is true that 2018 has been described as a year of extreme drought for Douglas and other counties in western Oregon, onrushing climate change identified as a principal reason for the continuing drought, the implications of the strongly inferred chronically depleted summer low flow regime highlighted by the Perry-Jones Study argues forcefully that those implications deriving from that condition be considered adverse and harmful until proven otherwise. UW has made this position, plainly and emphatically, to BLM in more than one NEPA document. To date, BLM has not responded in a manner that reflects the environmental gravity of this critical situation. That lack of commensurate response is a significant portion of this protest point.

Protest Point #6: Failure, to date, of the BLM to address the issue of onrushing, anthropocentrically caused climate change in a serious and effective manner.

Having seen Table 3-25, Vol. I, page 139 of the DRMP/EIS, UW is better able to comprehend the following unhelpful statement, from the same document: “*The BLM used all Federal lands instead of all lands, as the data for privately-owned forests tended to be skewed towards younger age classes than is typically present on the Federal lands...*”¹¹ (emphasis, UW)

The intervening private is “...*skewed toward younger age classes...*,” you say? That is certainly an understatement, although it also implies more than intended, perhaps, about the deleterious impact of private industrial timberland management on the intervening sections of Third Rock and Kernel Klink. It says more than intended perhaps about all of the environmentally degrading impacts of OFPA style management, not the least of which is the dire impact of these short rotation private lands on carbon-sequestration/release as it relates to onrushing, anthropocentrically caused climate change.

The ecological condition, such as it may be, of these intervening private industrial timberlands is the obvious climate change context of the lands of Third Rock under management authority of the RBBLM. Impacts, carbon-wise, from any extractive activities carried out by BLM must be measured from a baseline that includes all lands, public and private. The logic that informs this studied opinion is very much the same as the logic that insists that all other environmental impacts (e.g., roads, imperiled species ESA listed or not, chronically depleted low summer flow, etc.) must be measured from the same contextual management state.

In response to the excerpted quote from the DRMP/EIS, above, we offer this excerpt from UW: “... UW offers the following excerpt from the publication, [Oregon Forest Carbon Policy, V1.0 12-11-17](#), prepared by Mr. John Talberth, PhD., President and Senior Economist with the Center for Sustainable Economy, in Portland, Oregon: “**Timber harvesting is the single largest source of greenhouse gas emissions in Oregon taking into account (1) stored carbon removed from site and lost in the wood products manufacturing process and subsequent decay of final products; (2) the lost sequestration capacity of clearcut lands and logging roads, and; (3) emissions associated with decay of logging debris.**”¹² (We strongly recommend Talberth's full paper to BLM's attention. Likewise, we strongly recommend review by RBBLM of UW's [Protest Concerning Carbon Issues](#), a portion of its Protest of the Canyon Breeze T.S., pp. 15, 16, 17, 18 and 19.)¹³”

The following excerpt from UW's Canyon Breeze T.S. Protest, including as it does, the quote from Law et al. Concerning climate change and forest management practices is particularly germane: “*Pressing the issue still further, a study¹⁴ released in January of 2018 had this to say on page one, under the heading **Significance: 'Regional quantification of feasibility and effectiveness of forest strategies to mitigate climate change should integrate observations and mechanistic ecosystem process models***

¹¹ Draft Resource Management Plan/Environmental Impact Statement, Vol. I, page 133

¹² Oregon Forest Carbon Policy, V1.0 12-11-17, Pg. 2 <http://news.streetroots.org/sites/default/files/Oregon%20Forest%20Carbon%20Policy%20Technical%20Brief%201.0.pdf>

¹³ UW comments, Third Rock Harvest Plan EA, page 13

¹⁴ [Land Use Strategies to Mitigate Climate Change In Carbon Dense Temperate Forests](#), Law, Beverly E. et al., Dept. of Ecosystems and Society, Oregon State University, Corvallis, OR; Dept. of Forest, Range, and, and Fire Sciences, University of Idaho, Moscow, Id. And EcoSpatial Services LL.C., Flagstaff, AZ

with future climate, CO2, disturbances from fire, and management. Here, we demonstrate this approach in a high biomass region, and found that reforestation, afforestation, lengthened harvest cycles on private lands, and restricting harvest on public lands increased net ecosystem carbon balance by 56% by 2100, with the latter two actions contributing the most. Forest sector emissions tracked with our life cycle assessment model decreased by 17%, partially meeting emissions reduction goals. Harvest residue bioenergy use did not reduce short-term emissions. Cobenefits include increased water availability and biodiversity of forest species. Our improved analysis framework can be used in other temperate regions.'¹⁵(added emphasis, UW)

Lending a particularly current urgency to this protest point is the release, by the United States Government, on Friday November 23, 2018 of its assessment of where we are as a nation, climate change-wise, and where we are headed if current practices and policies persist. To wit: **“WASHINGTON — A major scientific report issued by 13 federal agencies on Friday presents the starkest warnings to date of the consequences of climate change for the United States, predicting that if significant steps are not taken to rein in global warming, the damage will knock as much as 10 percent off the size of the American economy by century’s end.**

The report, which was mandated by Congress and made public by the White House, is notable not only for the precision of its calculations and bluntness of its conclusions, but also because its findings are directly at odds with President Trump’s agenda of environmental deregulation, which he asserts will spur economic growth.”¹⁶ (emphasis, UW)

This frightening report was preceded by an equally disturbing one of a like nature issued on October 7, 2018 by a highly respected international agency of the United Nations, the Intergovernmental Panel on Climate Change (IPCC). Again, to wit: **“INCHEON, South Korea — A landmark report from the United Nations’ scientific panel on climate change paints a far more dire picture of the immediate consequences of climate change than previously thought and says that avoiding the damage requires transforming the world economy at a speed and scale that has ‘no documented historic precedent.’”¹⁷**

The nation was sunk deeply into an existential challenge of a different kind, when President Abraham Lincoln included the following plea, in a message sent to Congress on December 1, 1862: **“The dogmas of the quiet past, are inadequate to the stormy present. The occasion is piled high with difficulty, and we must rise with the occasion. As our case is new, so we must think anew, and act anew. We must disenthrall ourselves, and then we shall save our country.”** Today, as the climate reports referenced above forcefully, frighteningly and unequivocally indicate, it is the entire world which we human beings, all of us, are called upon to save. Agencies of our own government cannot hide behind nebulous excuses, offering half hearted measures for mitigation. As all of us, the BLM “... must think anew, and act anew.” This protest point is thus both protest and plea.

Protest Point #7: Roads

During a field trip to the Third Rock Harvest Plan Analysis Area, in February of 2018, UW observed that several of the spur roads slated for renovation etc. were as heavily treed as the adjoining forest. A number of these roads were described in the EA as “existing,” a description which hardly seems to

¹⁵ UW Protest Canyon Breeze Timber Sale, page 17

¹⁶ N.Y. Times, Nov. 23, 2018 <https://www.nytimes.com/2018/11/23/climate/us-climate-report.html>

¹⁷ N.Y. Times, Oct. 7, 2018 <https://www.nytimes.com/2018/10/07/climate/ipcc-climate-report-2040.html?module=inline>

apply to prospective road prisms, where numerous trees as old as those of the surrounding stands were observed. In our estimation, this condition must render these as “new” roads and, given the strictures of the NEPA process, they should have been described and analyzed as such.

Photos of some of these “existing” roads observed on the occasion of this February site visit can be viewed by entering this link into the address bar of an internet browser:

<https://www.flickr.com/gp/umpquawild/6jwy62>

Sincerely,

Joseph Patrick Quinn
Volunteer Conservation Chair,
Umpqua Watersheds, Inc.