

MY OPINION FROM BEHIND THE GREEN DOOR

About face

BY CHRIS BRATT

If you live anywhere within the Applegate, there have been a lot of opinions expressed these past few months about the Bureau of Land Management's (BLM) proposed Forest Plan Revision. BLM and their proponents claim the Revision Plan will economically "benefit our county" and still meet the agency's environmental obligations. Specifically, they say the Revision Plan will fund critical county services up to 94 percent of historical levels. These Forest Plan Revisions, which will affect a major part of the Applegate watershed, are being touted by BLM, county officials and timber interests as reconnecting "communities to forest management." They state their goal is to "meet the economic needs for local communities and protect our forest for generations to come."

In my judgment, the above statements and conclusions don't represent the real state of things, events or facts about BLM's forest management for our public lands. The truth is that BLM is planning to reverse management direction from their present conservation-oriented Forest Plans to a Revised Plan that places timber production above other uses.

The present BLM Forest Plan is being revised solely to provide a lot more profitable products for the timber industry and perhaps some additional revenue for our inept counties. Where federal judges and scientist have determined that BLM's present Forest Plan is the bare minimum needed to meet the legal requirements of the

Endangered Species Act and other laws, BLM's plan revision is recommending far lower protections for species and their habitats. One has to ask, how can BLM's Forest Plan Revision, which proposes a three-fold increase in logging and places timber production over other land uses and values, not dramatically reduce the health of the land and resources they manage?

Whatever happened to the conservation land ethic that BLM adopted in their present Forest Plans in 1994? Where are the voices of foresters who embraced that ethic?

A recent essay by Curtis White in the August 2007 *Harpers* magazine identified for me the rationalizations we humans and agencies like BLM use in our practice of forest conservation. Curtis White says: "We are willing to think that what we need is a balance between the requirements of human economies and the 'needs' of the natural world. It is as if we were negotiating a trade agreement with the animals and trees unlucky enough to share space with us. What do you need? We ask them. What are your minimum requirements? We need to know the minimum because we're going to consume any 'excess,' unless, of course, you taste good. There is always room for an animal that tastes good."

I also think of the famous forester/essayist Aldo Leopold, and

what he might have said about BLM's Plan Revision and land ethic. In 1966 he wrote, "Many foresters are quite content to grow trees like cabbages, with cellulose as the basic forest commodity. A system of conservation based solely on economic self-interest is hopelessly lopsided." Leopold and I believe economics should not determine all land use. In this case, BLM can't see the forest for the economic value of the trees.

Whatever happened to the conservation land ethic that BLM adopted in their present Forest Plans in 1994? Where are the voices of foresters who embraced that ethic? They have, no doubt, been silenced by the economics of keeping their jobs.

The agency's vision and strategy in 1994 states that they would manage the land and natural resources "to help enhance and maintain the ecological health of the environment and the social well-being of human populations." They also said, "Resource management must be focused on ecological principles that reduce the need for single resource or species management." Now they are planning to manage for a single resource (timber) as the dominant use of the forest, across 2.6 million acres.

If implemented, BLM's Forest Plan Revision will become a disaster for our public forestlands. Based on faulty assumptions, it will trigger a huge increase in logging levels, worsening a host of environmental problems here in the Applegate. In addition, BLM is disposing of our present

**For more information on
commenting on the
Draft Western Oregon Plan
Revision (WOPRI),**

**visit our website
oregonheritageforests.org**

**Send your comments to:
BLM WOPRI Office
1000 NE Oregon Street
Portland, OR 97209**

Applegate Adaptive Management Area (AMA) designation. In its place, our watershed will become an intensive Timber Management Area (TMA). The alternative management strategies successfully implemented over the past 13 years will give way to "getting the cut out." Without the protection of the Applegate AMA designation, we are bound to see a lot more negative impacts to resources throughout the watershed.

So, if you value these public forest lands beyond their capacity to supply board feet for timber interests and inconstant money to the counties, be sure to let BLM and your Congress folks know how you feel. BLM's official comment period for addressing their Draft Revision Plan ends on December 10, 2007. But it is important to send your comments even after that date. Most local conservation groups in the area already have made their evaluations of BLM's plan revision and could help you with your comments. If you have trouble, let me know.

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BEHIND THE GREEN DOOR

BLM: PRESSED TO LOG

If you live anywhere within the Applegate watershed, you're probably familiar with the BLM acronym. BLM officially stands for the Bureau of Land Management. When mocked by critics concerned with a particular issue, BLM has stood for Bureau of Livestock and Mining, Bureau of Land Mismanagement and many other names far more derogatory and comical. The BLM operates within the U.S. Department of the Interior, "The Nation's Principal Conservation Agency." It is the primary part of the Interior Department that is assigned to administer our public Lands.

Nationwide, the BLM manages 572 million acres, about a fourth of the United States, mostly in the west. Here in Oregon, the BLM oversees approximately 16 million acres with 2.4 million of those acres being public forest lands. Thirty percent of all the land in the Applegate Valley is administered by the BLM.

These are some of our countries most valuable and vulnerable public lands and the BLM's management priorities have long been the focus of bitter controversies over the health and use of them. Antiquated mining laws, oil and gas drilling, grazing, hunting, endangered species protection, offroad vehicle access, old growth logging etc., are just a few of the issues and problems the agency faces and seldom resolves in favor of the environment.

The BLM is at the center of these bitter controversies for lots of reasons, but at the top of the list is the lack of a clear mission for use and protection of our public lands. Under more recent Federal laws like the Clean Water Act and the Federal Land Policy and Management Act the BLM is obligated to preserve these public lands for the good of people at large. On the other hand, they are obligated by outdated and ineffective laws like the General Mining Act of 1872 and the Oregon and California Lands Act of 1937, to make these public lands available to commercial interests for private benefit and profit.

This commercialization of our public lands has become an impediment to BLM's conservation mission. It has continually lead to the manipulation of the agency's rules, regulations and orders by conservative appointees serving special interests. This political manipulation has resulted in the BLM viewing these public lands as a property right for private rather than public benefit. This agency bias favoring corporate interests has produced many flawed policies and a long list of environmental abuses. Many conservationists, former BLM employees and government auditors have often testified that the use of political appointees in top BLM management positions has frequently skewed policies in favor of cattlemen, miners, loggers and other consumptive users.

Presently here in the Applegate and throughout Oregon we are faced with a perfect example of this perverse political interference. Scientific processes are being tampered with to accommodate timber interests while accelerated old growth logging is being planned on all of BLM's public forest lands. Even though BLM's present Resource Management Plan (Forest Plan) has achieved a good balance between retaining healthy forest habitats and removal of forest products, they are now seeking what they call "a better way to do business."

The BLM has gone back (with lots of political help), to a previous interpretation of their antiquated Oregon and California Lands Act of 1937. They say this is a law where timber extraction trumps protection of the environment. Although the BLM's present Forest Plans

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were judged by them to meet all legal, scientific and ecological requirements, new anti-conservation forces in charge of the agency have pressed to cut more timber. These forces have compelled the BLM, through a Settlement Agreement with the timber industry to revise their Forest Plan. This Forest Plan Revision provides for huge increases in timber sale volumes.

From my perspective, the BLM has favored commercial timber interests with more than adequate amounts of timber for sale this past decade. In fact, annual timber sale quantities need to be revised further downward to protect the environment. The BLM has over estimated their ability to accomplish the intensity of management called for in their Forest Plans. In addition, reductions are needed in their annual sale quantities for failing to factor in the difficulties they have encountered using untested and untried management techniques. Also, the continuing decline of the Northern Spotted Owl, brought on by the extensive cutting in owl habitat these past 13 years require those further reductions in annual sale quantities to prevent the extinction of this endangered specie.

In any case, the heavy corporate hands of the BLM hierarchy are quite apparent and they expect to prevail in these proposed BLM Plan Revisions. The BLM will be pillaging the environment if we let them eliminate the existing habitat protections of the current Forest Plan. It's time we as concerned citizens call a halt to the political manipulation, exploitation and degradation of these public forest treasurers. This is the time to get involved and respond to the BLM and our congressional representatives. Tell them you support maintaining the current Resource Management Plans of the BLM and resent the political interference that has forced these Plan Revisions in the first place.

See the BLM Plan Revision side bar showing how you can comment and participate. Give me a call if you run into trouble.

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(SIDE BAR FOR BEHIND THE GREEN DOOR ARTICLE)

BLM'S DRAFT FOREST PLAN REVISIONS AVAILABLE FOR REVIEW AND COMMENT

By the time you receive this newspaper the Bureau of Land Management's (BLM's) Western Oregon Plan Revision Draft Forest Plan will be available for review and comment. These forest plans will decide the management direction for BLM's public forest land in Oregon and here in the Applegate for approximately the next fifteen years. The draft document is expected to contain approximately 1700 pages or more with many large printed maps. You have several choices on how you would like to review and comment on the document including:

Review the document at your local library (if it's open) or at your local BLM office in Western Oregon.

Review the document on the internet in a form similar to its printed format or through interest-based and map-based tools being developed for the web.

Request that only a summary document be mailed to you in-lieu of the complete document or

Request that a complete document and a map packet be mailed to you.

The public review and comment period is 90 days from the issuance of the draft plan.

BEHIND THE GREEN DOOR

BLUEPRINT FOR DISASTER

The Bureau of Land Management (BLM) is moving backward, backward into the dark ages of forestry, when the BLM considered their sole mission was to design and implement timber sales. Forced by increasing political pressure from the Bush Administration and the timber industry, the BLM has begun revising all of their present Resource Management Plans (RMPs) in western Oregon. Through this two year RMP revision process, the BLM is intending to change all the major land and resource allocations on more than 2.5 million acres of public land they manage.

The purpose of these revisions is to abandon the present safeguards on the BLM-managed lands allocated to Riparian Reserves, Late Successional Reserves, Adaptive Management Areas and Connectivity/Diversity Blocks. These RMP revisions intend to disregard the sound scientific principles now in place and dismantle the existing forest Reserve System that protects all elements of the forest environment. Instead of continuing to pursue the worthy objectives of the existing RMPs, which for 10 years has guided and emphasized the management goals of protecting the long term health of forests, wildlife and waterways, the BLM is moving toward the past by emphasizing the short term goal of pursuing a more substantial amount of timber to sell from public lands.

BLM State Director, Elaine Brong, says, in support of these proposed radical RMP revisions, that they were initiated because, "We (BLM) have not been able to meet our commitments to counties and local communities to make a sustainable supply of timber available for sale." She also states that the existing RMPs, "have proven extremely controversial," and "that the (existing)plans have not been able to operate as envisioned."

Ms Brong seems to forget that she and other BLM managers are managing the public forests for all Americans and not just the timber industry. She also seems to have forgotten that BLM's commitment to long term health and sustainability of ecosystems is more important than a commitment to sell timber. The production of timber is only one important objective of the existing RMPs. But it becomes a risky focus when our forests are in trouble and need to be managed carefully to restore and enhance our environment.

The BLM says they still believe in the key principles that have guided the existing RMPs. If this is truly the case, changing the priorities to sell more timber is out of order. The desired outcome of the existing RMPs was sustainable forest management, not increased timber cutting. Our forest lands can only continue to meet the ecological, social and economic objectives for future generations if we continue to put healthy forests and sustainable ecosystems before commercial gain for special interests.

Since the implementation of the existing RMPs in 1995, the BLM has embraced the concepts of ecosystem management and a broader management perspective than they had done in the past. I see no compelling reason for the BLM to return to increased timber production over their declared emphasis on providing habitat for late-successional and old growth forest related species and maintenance of water quality. The BLM's own recent evaluation documents assure us they are meeting the objectives of the existing RMPs. For example, the eighth year evaluation document of the Medford District's RMP in 2004 determined, "that, with the exception of a few program areas, all RMP program management actions/ objectives were being implemented at or near 100 percent

completion rate." This local BLM determination certainly differs from Ms. Brongs statement, "that the (existing) plans have not been able to operate as envisioned."

There are other important factors that the BLM managers administrators and decision makers have failed to consider before embarking on these ill-fated RMP revisions. Many timber sales that plan to cut large trees are often singled out by polarized opinions, controversy and protests. The existing RMPs recognized the changing public values about forest management and emphasized the need to collaborate with communities like the Applegate in making timber sale decisions. The BLM does not have the staff or money to invest in more timber sale projects that have little public support and are very costly to analyze and implement. Also the latest science and case law that has emerged from timber sale challenges continues to raise the standards BLM planning documents must meet. These new standards for BLM's environmental documents make BLM's timber sale programs more costly and legally vulnerable.

Isn't it time for the BLM to get serious about embracing their proclaimed status as "The Nation's Principle Conservation Agency," and that they have the responsibility for "fostering the wisest use of our land and resources (and) protecting our fish and wildlife?" This enormous revision effort to satisfy the timber industry and "get the cut out" is in direct opposition to BLM's declared mission statements and existing RMPs. The outrageous cost and effort being expended by BLM to insure an increase in timber cutting is to tally out of bounds and beyond reality. It is time for the BLM to recognize and embrace the intent of their existing RMPs. The BLM must provide for watershed health and ecological sustainability as the desired outcome in the balance between protecting and using the land. The existing RMPs make this provision.

This revision process will include an alternative that, if chosen, will allow the BLM to continue their management under the existing RMPs. There is also an established framework for public participation in these RMP revision decisions. We all need to work hard to use this opportunity for public involvement to convince the BLM to continue to manage our public lands in the best interest of our future generations. Call or write the BLM and tell them you like the existing RMPs and you are not interested in forest management projects that are just excuses to cut more timber.

Let me know if you have any excuses for not participating.

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BEHIND THE GREEN DOOR

LAND SACRIFICE IN THE APPLGATE

How do you like the idea of having an ever increasing number of motorcycles, all-terrain vehicles (ATVs) and other off-highway vehicles(OHVs) having easy access to thousands of Applegate Valley acres to "recreate"? Well, like it or not, the Bureau of Land Management (BLM) is intent on moving forward with their OHV Plan to permanently establish a vast OHV playground here in our backyard.

This scheme called the Timber Mountain/ John's Peak OHV Management Plan (OHV Plan), spirals far beyond the confines of Timber Mountain and John's Peak just west of Jacksonville. The OHV Plan will provide a designated destination playground for OHV enthusiasts on a minimum of 16,250 acres of public land and afford access to thousands of additional public and private land acres. The OHV Plan includes roads that lead all the way to Grants Pass along the northern ridges of the Applegate Valley.

The BLM got off to a bad start when they proposed this OHV Plan more than 10 years ago in their 1994 resource management plan (RMP). The following paragraph shows the extent of BLM's remarks in their RMP document: "Three areas, Ferris Gulch (2,200 acres), Timber Mountain/John's Peak (16,250 acres) and Quartz Creek (7120 acres) will be managed to provide for OHV use. See Table 8." (Table 8 says all three areas will be "limited to existing roads and designated trails.") The accompanying Recreation Map #9 for the RMP does not even list these three OHV areas nor does it locate any OHV areas on the map. BLM designated these three OHV areas in their RMP with virtually no public participation in the planning process, no available onsite data and incomplete information about exactly where these areas were located.

Prior to their RMP decision, the BLM did not do the required analysis to determine whether their OHV Plan would be in serious conflict with local communities and landowners surrounding the proposed project. Neither did the BLM do the required surveys of the lands within their OHV Plan Area to determine the extent of OHV damage that had already occurred from decades of extensive illegal trail building (an OHV damage assessment in the use area is still not available from BLM). BLM also failed to consider, prior to their RMP designation of 16,200 acres, the extent of future adverse environmental impacts as a result of their contemplated dramatic increase in ORV use in the area or the staff and money available for area rehabilitation, law enforcement, education programs, etc.

BLM has failed to fully assess these and other problems prior to designating these 16,250 fragmented and scattered public land acres for long term OHV use. This failure has exacerbated the conflicts between the BLM, local Motorcycle Riders Association, affected communities, environmental groups and concerned area landowners. In addition, during the past few decades, BLM has not shown the willingness or ability to control or limit OHV use as required to "existing roads and trails" on the lands they manage in the OHV Plan Area. What the BLM has allowed to happen in the OHV Plan Area and throughout the Medford District by not banning or containing illegal ORV use is unlawful. It would be kind to say, BLM's commitment and follow through to their required procedures outlined in their Management Plans and Executive Orders has been missing or unreasonably delayed.

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There are two other significant unresolved matters that BLM has refused to consider thus far in their OHV Plan. One is the ongoing timber sale programs of both the BLM and the industrial forest land holders within and adjacent to the OHV Plan Area. These timber sale programs continue to open up forest lands and build roadways providing additional access for OHVs. This logging and road building will continue to expand the roads and trails within and outside the OHV Plan Area. BLM has not considered these problems with their added environmental concerns either in their timber sale planning documents or their OHV Plan thus far.

The second significant unresolved matter that the BLM must consider is the City of Jacksonville's recent decision not to sell their 1800 acre watershed area to the local Motorcycle Riders Association. This decision and a 900 signature petition from concerned Jacksonville residents about OHV use may prevent OHV users from crossing the city's land will further fragment BLM's OHV Plan and necessitate additional planning and management decisions. The 900 signature petition drive to block Motorcycle Riders Association is also an indication of how the concerned residents of both the Applegate and Rogue River watersheds will respond to BLM's OHV Plan when the details of the Plan are known. I believe there will be widespread opposition to the present OHV Plan.

The BLM's stated purpose for developing this OHV Plan "is to better manage this OHV use." But how can BLM possibly better manage this OHV use when it was clear that their plan contained virtually no public participation in the original designation process, no information as to where these OHV Areas would specifically be located and no available on site data revealing the extent and nature of OHV problems. It is also clear that the BLM has made an arbitrary decision to push ahead in this indefinite OHV consideration area of 16,250 acres with their present, ill-fated OHV Plan. It is not incumbent on the BLM to reestablish or sanction the illegally built OHV trails even in this area with heavy historical OHV use. Neither has the BLM the right to include thousands of private land acres within the boundary of their OHV Plan. Better management of OHV use will not take place under these unresolved conditions affecting this proposed OHV Plan. A better purpose for developing an OHV Plan would be to reform the way we designate and establish OHV areas on public lands.

We presently have the opportunity to reform all BLM's OHV Area designations. The solution to the problems we face in the OHV Plan can be addressed in BLM's Western Oregon Plan revision process. This RMP Plan revision will consider BLM land use designations of "open," "closed" or "limited" ORV use for all lands in the Medford District. It is essential to hold off any decisions about the timber Mountain/John's Peak ORV Management Plan until these new ORV land use designations are recommended and considered by the BLM and the public. We don't have to sacrifice all this land to OHVs. Are you "open" to a change?
Let me know.

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BEHIND THE GREEN DOOR

TEARING IT UP

I subscribe to an excellent biweekly newspaper called High Country News (For People Who Care About the West). One troubling article I read recently (March 19, '07 issue) was called, Driven To Fight. The story was an interview with a retired Bureau of Land Management (BLM) special agent (law enforcement officer) who now finds herself battling the very agency she once worked for. The fight with BLM, her former employer, is about the damage the BLM is letting off-roaders do to invaluable archaeological and historic sites in southern Utah.

After working for the BLM for 27 years, this retired law enforcement officer, Lynell Schalk, says BLM's philosophy about archaeological protection has changed, "and the BLM and county are hell-bent on destroying a unique resource." She believes the BLM's emphasis has shifted from preservation to motorized recreation and is having great difficulty protecting resources while managing off-road vehicles.

The BLM's difficulties at the Utah site include: Most of the land has been designated as an "open area," (meaning off-road vehicles can drive anywhere), not enough BLM managers on the ground, failure to prosecute potential cases of damaged resources, off-road trails are not designated and once a trail is created by users it is considered existing and therefore essentially legitimate.

Ms Schalk claims, "There is a land giveaway going on out there and the public doesn't even know about it." She adds, "I see agency malfeasance here."

Her contentions are supported by another former BLM employee and noted area historian. He, too, is disturbed by the BLM's lack of commitment to archaeological preservation. He has watched a number of sites across Utah go, "from pristine to devastated," due to off-road vehicle access.

Does any of this tale sound familiar? A version of it has taken place on BLM lands across the country. Like the Utah story above, there is a BLM public land giveaway to off-road vehicle enthusiasts going on here in the Applegate and surrounding communities. There is also a local battle raging between these communities affected by this land giveaway and the BLM. The main question is whether it is appropriate to have such large scale off-road activity so close to our rural residents at all. The serious threats posed by off-road vehicles that use remote regions is bad enough, but many times worse when you add the serious conflicts of being close to so many people who live nearby.

The situation has worsened locally because the BLM is poised to implement their Timber Mountain/John's Peak Off Road Vehicle Plan (TM/JP Plan). The Plan was formulated without public scrutiny. The public can't debate a Plan that doesn't exist. Yet the BLM introduced and approved the TM/JP Plan with no maps, boundaries or environmental analysis in their 1994 Resource Management Plan (RMP). The BLM, in cahoots with the Oregon Department of Parks and Recreation and the Motorcycle Riders Association, set aside 16,250 public land acres vaguely situated somewhere northwest of Jacksonville for an off-road vehicle playground. Within this vast mysterious location our local BLM has allowed off-roaders to run amuck for more than three decades from Jacksonville to Grants Pass.

Tearing It Up - 2

Although the BLM's 1994 RMP called for restricting off-roaders to BLM roads and designated trails, they have never designated any trails. In fact, off-roaders have roamed completely uncontrolled, tearing up the ground and making their own trails. Consequently, hundreds of miles of illegal user-built roads and trails have been blazed over the years. Because no trails have been designated or closed by the BLM, off-roaders currently travel unrestricted in and out of the forest at will, on both public and private lands. In addition, a number of BLM and private timber sales have been overlaid in the same areas now designated by the BLM as their off-road vehicle area. The new roads, skid trails and open ground from thinning trees and shrubs has increased access, extending and encouraging soaring off-road use.

It is obvious from just the Utah and Applegate experience that the BLM has no coherent national or local off-road vehicle policy or control strategy. The agency is struggling with the dramatic increases in off-road use and the accompanying environmental degradation. Participation in off-road activities has increased by 42 percent between 1999 and 2004 with no agency oversight. It is also obvious that the BLM has no idea what the extent of the effects off-road activities have on the land and resource health. My observations over the past few years indicate the BLM has no land health assessments for determining the travel impacts of off-road vehicles across various ecosystems. Neither have they much (if any) monitoring or research data.

Despite the ongoing trite assertions the BLM keeps making about all the opportunities our community has to influence their TM/JP Plan process, many of us don't believe it. There is overwhelming public support against this plan. From its start in 1994 up to the present, the BLM planning process has been flawed. The public has never been given a real opportunity to question the original TM/JP Plan decision. This area is the wrong place for off-roaders and the BLM must revisit the appropriateness of their 1994 RMP designation.

My suggestion for is the BLM dispense with the present plan proposal (tear it up) and start a process that begins with enforcing their existing executive orders. Today the BLM operates under the 1972 Presidential Executive Orders that require off-road vehicles to "be controlled and directed so as to protect the resources of those lands..." and if damage occurs the agency, "must immediately close such areas or trails." Once BLM fulfills their Executive Order obligations by repairing and closing down open areas that have been misused, they can start work on a more comprehensive off-road vehicle plan, a long range plan that considers all the land in the Applegate watershed. This new plan could allow for some road and designated trail use in appropriate places, but more importantly we need a firm commitment from the BLM that unrestricted cross-country travel in the Medford District will end.

If off-road vehicles tear you up, let me know.

Chris Bratt

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BEHIND THE GREEN DOOR

SACRIFICE ZONES

The former chief of the U.S. Forest Service, Mike Dombeck, had it right when he said, "There is no reason the richest nation on earth should be funding the education of kids at the expense of our national forests."

Unfortunately, Federal lawmakers haven't heard his plea. They continue to tie the cutting of trees with the yearly funding of many Oregon county governments and schools. After decades of dependence by counties like Jackson and Josephine on logging revenues and more recently "safety net" payments from Congress, we still have no stable and adequate funding for public education or other basic community services. It has become obvious to me that the continuing reliance on county funding generated from the fluctuating timber revenues from cutting down our public forests is very destructive to the natural resources contained in those forests. Further, if we continue to rely on the periodic funding whims of Congress to renew or extend direct "safety net" payments (timber replacement funding), we still end up with degraded forests and no guarantee of stabilized funding. We need a fair, reasonable and dependable funding source to sustain our rural communities and forests.

I believe these affected counties deserve compensation, given that many of them have fifty percent of their land base under Federal management. They receive no tax revenues from these Federal lands and have become dependent on the shared money from cutting trees. We need a more reliable and less destructive system of payments directly from the Federal government.

I recommend a direct payment each year from the U.S. treasury in lieu of taxes that could be collected by the counties if these lands were in private hands. The initial amount of revenue the counties receive would match the present "safety net" figure, adjusted annually for inflation.

Funding affected counties based on this formula will end the ongoing debate about cutting more trees to pay for community services and schools. It will also allow public forest managers to concentrate on protecting the environment as their prime motivation rather than getting out a maximum timber cut. This funding solution might even improve cooperation between the various factions interested in sustainable forest management and prevent making a sacrifice zone out of our natural heritage forests.

Another untapped revenue source that needs consideration for funding Oregon's rural schools and community services is the tax on Oregon corporations. Presently, there is a huge disparity between the taxes Oregon residents pay and the taxes that corporations who do business in Oregon pay. Oregon residents are expected to pay \$10.6 billion in taxes between 2006 and 2008 while corporations are anticipated to pay a paltry \$705 million. No state in the USA. asks business to pay a lighter share of its state budget than Oregon does, according to the Council on State Taxation which represents big business.

In addition to \$40 million in new and expanded corporate tax breaks a year, the Oregon Corporate Tax Rate was lowered to 6.6 percent in 1987 while households by contrast on most incomes pay 9 percent on state income taxes. Also, under a policy known as "single sales" Oregon taxes business firms solely by where they sell goods and services. Under this "single sales" policy, Oregon companies that sell nation wide could cut their state tax bill

by 90 percent.

Besides all those benefits, Oregon has a minimum corporate tax rate of only 10 dollars, the lowest in the nation. We also have the states kicker law which gave corporations an automatic 36 percent discount on their tax bills in 2005. If Oregon corporations paid their fair share of taxes, it would certainly help rural communities from becoming economic sacrifice zones.

A large number of residents in the Applegate and adjacent communities are very concerned about another sacrifice zone called the Timber Mountain/John's Peak Off Highway Vehicle Management Plan (OHV Plan). This OHV Plan is the brain child of the Bureau of Land Management (BLM), Motorcycle Riders Association (MRA) and the State of Oregon, Parks and Recreation Department.

The OHV Plan is soon slated to create a "Recreation" Park for off road vehicles (motorcycles, etc.) in our midst. The plan will make tens of thousands of public and private land acres accessible to off roaders on the ridges between Jacksonville and Grants Pass. Hundreds of people have organized to question whether this is the appropriate place for an off road playground (read "sacrifice zone") given the proximity to so many rural communities and residents.

It's worrisome enough to think of the environmental and social impacts of this OHV Plan alone, but now the BLM has begun to overlay large timber sale projects that share the same geographic areas as the OHV Plan. Recent timber sale projects like the upcoming Galls Foot Forest Management Project are adding huge negative impacts to the declining cumulative conditions already apparent in each watershed throughout the OHV Plan/Timber Sale Area and beyond.

BLM's decision to implement these and other timber sale projects in the same area as the OHV Plan is a mistake. This action will result in irreparable loss for the environment and community support for future projects. What action will you take?

Let me know.

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BEHIND THE GREEN DOOR

MONEY DOESN'T GROW ON TREES

When I was a child and wanted something the family couldn't afford, my mother would say to me, "You know Christopher, money doesn't grow on trees." Well the reality is, I need to repeat my mother's admonition to the Bureau of Land Management (BLM), U.S. Forest Service, county officials, and many of my fellow Oregonians.

The fact is, we can no longer expect to pay for the ever expanding social needs of our society with the money we receive from Federal timber receipts. Selling and cutting trees from our public forests to support vital public services such as libraries, public health, law enforcement, county road maintenance, etc. will never again provide the level of financial relief needed for these services across rural Oregon.

The U.S. Congress, in passing the Oregon and California Lands Act of 1937 (O and C Act), agreed to give one half of the receipts from Federal timber sales to the western Oregon counties that contained O and C lands. For many years these timber receipts were enough to enable these counties to fund basic county services. But today, smaller trees are being sold because of past overcutting of our old growth forests, new more stringent laws are protecting the environment and more science-based management plans are being implemented. The revenue picture has changed dramatically including the fact that many offered timber sales have no buyers. The dream of money from trees has faded for Oregon counties. The revenue from selling public timber can only provide a small fraction of the needed county funds.

Due to some progressive thinking by previous Clinton Administration officials, local environmental groups and some elected representatives, Congress has continued to provide financial relief to Oregon's O and C counties for more than a decade. Counties have received additional Treasury funds when annual timber sale revenues fall below the highest amounts counties received in the mid 1980s. Although this formula was not intended to provide permanent funding, it has stabilized county revenues. It has also broken the century-old practice of linking the funding of vital public services with fluctuating timber harvests.

After the last rural county funding legislation outlined above expired in September 2006, Oregon's Congressional delegation has only recently been able to secure a one-year extension of these county timber payments. In the meantime, Jackson County libraries have closed and soon other public agency layoffs are anticipated throughout southern Oregon. The Bush Administration and many in Congress are not wanting to extend the legislation or provide another replacement for O and C county timber revenues.

Unfortunately, the Bush Administration and their political appointees managing the BLM and Forest Service have an idea of their own. Guess what? They once again want 18 Oregon counties to rely strictly on Federal timber receipts to fund their vital services. They want to revise present agency timber management plans to allow more trees to be cut from public forests to fund these counties

Cutting more trees to get more money for Oregon's counties is not a new idea. It's just an old bad idea that will further degrade our forests by lowering environmental protections now in place. It is the same destructive forest management scheme that the BLM and Forest Service had practiced for decades prior to implementing the Northwest Forest Plan in 1995. It is an idea put forward by the timber industry, and one that the Bush Administration has

promised to
p.2, Money

implement before leaving office. It is simply an excuse to supply more wood for timber interests.

The BLM and Forest Service admit that in the late 1980s and early 1990s timber sales on Federal land and the resulting revenue to counties decreased sharply. These Federal agencies still contend the drop in timber money for counties was caused by "legal challenges and harvest adjustments to meet the habitat needs of the Northern Spotted Owl," and not their disregard for the Owl or Federal laws such as the Endangered Species Act. We can rest assured that if these agencies continue to break the law or don't meet their own legal requirements, there will be further legal challenges and again sharply reduced county revenues.

As I've suggested before, it would be a lot simpler to have the Federal government send payments to rural counties in lieu of property tax for the lands the agencies manage. (Approximately 50 percent of Jackson and Josephine Counties are managed by Federal agencies). Any moneys received from timber sales would then go back to the U.S. Treasury. The rural counties would also have a fair, reliable and permanent solution to their funding dilemma.

Maybe the solution is too simple. But if you agree with my mother that money doesn't grow on trees, let the agencies know. And while you're at your computer or desk, ask them to maintain their current management based on the Northwest Forest Plan in their upcoming Western Oregon Plan Revisions.

Give me a call if you need help.

Chris Bratt
846-6988

BEHIND THE GREEN DOOR

INVASION OF THE OFF-ROADERS

The title of this article sounds like a new horror movie, doesn't it? Well, if the Bureau of Land Management (BLM) and the Off-Highway Vehicle (OHV) operators and boosters have their way, OHV use in the Applegate will become more horrible than any movie you have seen.

If you haven't already heard or read, the BLM is presently planning a dramatic increase in OHV activity in Southern Oregon and here in the Applegate in particular. It seems we are slated to become the off-road vehicle mecca for the rest of the state and beyond.

Over 105,000 acres out of BLM's total 860,000 acres they manage in the Medford District (12 percent of the District's land base) are being considered for OHV "Emphasis Areas." Although many of us consider these OHV "Emphasis Areas" as off-road sacrifice areas, the BLM says they are just "where OHV use is more concentrated and intensively managed."

BLM is looking to establish thirteen potential OHV "Emphasis Area" sites (see map), all located adjacent to or near private land in rural residential areas. These particular OHV "Emphasis Areas" were never identified through any public process. They were chosen by the BLM strictly because they were "currently receiving a moderate to high level of OHV use."

Here in the Applegate, five of the thirteen OHV "Emphasis Areas" are being considered by the BLM. Two "Emphasis Area" holdovers from the present Forest Plan are the very contentious Timber Mountain/John's Peak OHV Area of 16,375 acres and the Ferris Gulch OHV "Emphasis Area" of 2,222 acres. Both of these "Emphasis Areas" are in the Middle Applegate and stretch from Jacksonville to beyond the town of Applegate. The other three OHV "Emphasis Areas" in the Applegate are new BLM proposals. They are: Anderson Butte OHV "Emphasis Area" consisting of 11,742 acres bounded by Sterling Creek and the Little Applegate River; Spencer Creek OHV "Emphasis Area" containing 7,468 acres, east of Murphy Creek near the town of Murphy; and Elliot Creek OHV "Emphasis Area" with 3,931 acres in the Slate and Cheney Creek Areas. All of the above "Emphasis Area" acreage numbers only include BLM lands that are interspersed with many other private landowners who will be affected by these designations.

Although BLM states that OHVs using these "Emphasis Areas" will eventually be limited (within five years) to "designated roads and trails," there are presently no road or trail designations in place. BLM has failed to make or enforce any road or trail designations during the past 13 years. Neither has there been any environmental analysis made public of existing OHV impacts to natural resources. No surveys of negative impacts to rural residents or critiques of the effectiveness of BLM's enforcement and management guidelines on any OHV "Emphasis Area" designation have been done either. BLM is required to do this kind of analysis before these OHV designations are made. Also, if these proposed OHV "Emphasis Areas" are approved by the BLM, citizens will have no further opportunity to question whether these "Emphasis Areas" are in appropriate locations for this extensive and intensive OHV activity.

In addition to these thirteen high intensity OHV "Emphasis Areas," BLM is also proposing to designate a total of 825,188 acres (96 percent of the Medford District BLM lands) for "limited" OHV use. BLM is assuming that they can confine OHV use to designated roads

and trails not only in "Emphasis Areas," but in the rest of the Medford District as well.

Practically every acre in the Medford District will now be considered for some level of OHV use and most with a lot less oversight than others. The proposed redesignations of OHV areas to accommodate motorized activities at such a large scale will bring OHV use to the doorstep of every rural land owner.

These BLM OHV proposals will certainly increase OHV opportunities, but will also cause the curtailment or prohibition of all other non-motorized recreation potential across the whole Medford District. Not many people will want to conduct a non-motorized recreation activity in the midst of a loud, smelly, erosive beast.

The BLM claims that all their OHV designations are based on the protection of natural and cultural resources, public safety and limiting visitor conflicts. But, while making those claims, they exhibit a lack of due care or concern for the control of OHVs and the protection of our natural or cultural resources. BLM's proposals for designating these OHV areas has been and continues to be, arbitrary and lack the objective criteria to support their claims. The ongoing threats to our public lands and rural residents that these OHV designations impose are the result of BLM negligence over many decades.

Even though the BLM seems hell-bent on enforcing their extreme OHV agenda, they are not having much luck in convincing the public. In fact, residents from all around the John's Peak OHV "Emphasis Area" have presented 1,665 signatures on a petition to BLM and legislators objecting to BLM's OHV plans and requesting removal of the OHV "Emphasis Area" designation. If BLM would like to avoid this kind of ire from adversely impacted neighbors and begin to obey the law at the same time, I have a modest proposal.

The BLM should begin their motorized recreational program by declaring all the lands in the Medford District temporarily "closed" to OHV use. Then, they could sort out which of their lands, in conjunction with US Forest Service lands throughout Southern Oregon, are appropriate and available for OHV use. Both agencies could then begin a united systematic effort, based on an Environmental Analysis, to open small scattered areas to "limited" OHV use. These small OHV areas could be expanded or closed depending on the impacts they receive and how strict guidelines are followed. A guiding OHV management plan would be written by both agencies to insure consistent, positive and environmentally responsible OHV management of our public lands.

Do you have a modest proposal? Let BLM know by January 11, 2008.

CHRIS BRATT 846 6988

ADDITIONAL ATTACHMENTS TO CHRIS BRATT'S COMMENTS ON BLM'S WOPR DEIS

December 27, 2007

BLM, Oregon/Washington State Office
Attention: Western Oregon Planning Revision (OR930.1)
P.O. Box 2965
Portland, Oregon 97208

Ed Shepard, Oregon/Washington State Director
Bureau of Land Management
333 SW 1st Street
Portland, OR 97204

RE: BLM Draft WOPR Comments;
2005 Applegate Adaptive Management Area Collaborative Watershed
Restoration Proposal

Mr. Shepard and the Western Oregon Planning Revision Leadership Team,

This communication is submitted as official public comment on the *Draft Western Oregon Plan Revision*.

Our response addresses three primary issues:

- 1) Special acknowledgement and collaborative management of the Applegate Watershed.
- 2) Unique ecosystems of southwestern Oregon
- 3) Historical national and international recognition of the Applegate Partnership and/or the Applegate Watershed

We have also included an addendum, which summarizes our involvement with our response to the WOPR.

1.0 Special Acknowledgement/Designation

The Draft WOPR makes no mention of the Applegate Adaptive Management Area (AMA) nor the collaborative land management with Applegate Partnership. The Applegate Partnership recognizes that it would be pre-decisional for the BLM to *designate* the Applegate Watershed as a special management area prior to BLM making a decision as to which alternative, or combination thereof, will finally be chosen to guide management of O&C lands. It has been suggested by the BLM that the proper vehicle to make this designation should be accommodated through a Memorandum of Understanding (MOU) with the Applegate Partnership at the Medford District Level. *While necessary, an MOU does not entirely meet our needs.*

The Applegate Watershed was established as an Adaptive Management Area as part of the Northwest Forest Plan in 1994. The Applegate Partnership has had MOUs in place with both the US. Forest Service and the Bureau of Land Management since that time. These MOUs established the collaborative nature of land management alternatives and decisions that have guided the development of various treatments of these lands over the past 12 years.

These MOUs have been given land management backbone *only* because of the specific designation of the watershed as an AMA through the Northwest Forest Plan. Success has been achieved on the ground in the Applegate AMA because:

- 1) The federal land managers in place (District and Resource Area Managers for the BLM and Forest Supervisor and District Rangers for the USFS) have generally been either receptive or *proactive* to managing the Applegate watershed *collaboratively* and in keeping with the *landscape-level ecosystem* approach; and,
- 2) Partnership personnel and affiliated organizations and individuals have similarly dedicated thousands of hours of personal time to make this work in an environment that is highly charged with strong voices from both the timber interest and the environmental community.

We understand and acknowledge that much of the detailed land management activity that we are seeking for the Applegate Watershed is best delineated and more appropriate in the new Medford District Resource Management Plan (RMP), rather than in the WOPR. *The Applegate Partnership agrees that a MOU is a useful tool for collaborating with various community groups, but we feel it is not entirely sufficient in the case of the Applegate Watershed.*

An MOU is a mutually agreed-upon, non-binding agreement between both parties. We are not willing to rely on the use of an MOU to codify the collaborative relationship between the Applegate Partnership and the BLM, because either party can easily dismiss the MOU without cause. While outright termination of an MOU concerning the Applegate Watershed is highly unlikely, the success is based *solely* on the personal style and interest of the federal lands managers in charge. We are concerned that *benign neglect* by an agency manager not interested in collaboration, nor dedicated to the ecosystem-wide approach to land management, could easily undo more than fifteen years of successful land management collaboration and progress.

In essence, we are seeking assurance that the agency will be *required* to continue to work with the community on this watershed planning process, regardless of individual likes or dislikes of the ever-changing personnel within the agency, or because of the guaranteed policy shift with each administration change every four or eight years.

We have invested 15 years in this highly successful process, and today there is only one agency person at the District level in a position of authority who has any historical perspective of what has transpired between the agency and the Applegate community since 1992. *This lack of surety does not give us great confidence that the nature of our work has any long-term viability or sustainability with an agency that is conditioned with perpetual change.*

In light of this history, the Applegate Partnership is asking the BLM to acknowledge (not designate) that there exists within the O&C lands areas of special interest or unique landscapes that offer valuable collaborative land management opportunities to the BLM, the details of which will be developed by each BLM District and included in their RMPs. One such opportunity is the Applegate Partnership and the Applegate Watershed.

The Applegate Partnership is further requesting that the *acknowledgment* of these special or unique landscapes be applicable to all of the Alternatives, rather than just in

the No Action and Alternative #3, and that this be codified within the WOPR documentation regardless of the Alternative chosen. Any specific management plan developed at the District level can then be tiered back to the specific acknowledgment in the WOPR, which in turn *provides assurance to the community that the Agency is willing to put its money where its mouth is*. Without this specific reference in the WOPR, communities such as the Applegate will continue to be vulnerable to the whims of changing personnel and changing policy, neither of which is beneficial to long term, responsible management on our public lands.

Our request for the BLM's *acknowledgement* of the uniqueness of the Applegate's collaborative land management is based upon our success on the ground, as well as on many federal mandates regarding collaboration.

The *Healthy Forests Initiative* and the *Healthy Forests Restoration Act* state that land management agencies must provide the time and opportunity for public collaboration, particularly when dealing with wildfire and hazardous fuels mitigation efforts. Unfortunately, no mention of the significance of either of these documents was found in the WOPR, except for the listing of the HFI in Volume III, "References". There is also no mention of required "Community Wildfire Protection Plans" which we all know are a significant part of today's forest health/wildfire issues. The *Applegate Fire Plan*, a recognized CWPP written in 2002, addressed hazardous fuels reduction, forest health, prescribed fire, ecosystem health, species diversity, and fire-resilient stands; and it is being implemented. More than twenty-two strategic, priority projects are currently being implemented or have been completed on private and public lands within the past five years. *We feel this is an exceptional measure of success that cannot, and should not be ignored by the BLM.*

The *National Fire Plan*, although not a single, cohesive document, also propounds working with local communities. Collaboration with the public and communities is "the cornerstone" of *A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment: 10-Year Comprehensive Strategy Implementation Plan*, which guides implementation of the National Fire Plan. Please note that the title refers to risks to communities and the environment, something that the Applegate Fire Plan clearly addresses. Why is neither document mentioned in the Draft WOPR, save a brief reference to the National Fire Plan as an example of a "new policy" on page 5?

Executive Order 13352, dated August 26, 2004 is entitled "*Facilitation of Cooperative Conservation*". Its Purpose is to ensure that the Department of the Interior (and others) implements "laws relating to the environment and natural resources in a manner that promotes cooperative conservation, with an emphasis on appropriate inclusion of local participation in Federal decision-making, in accordance with their respective agency mission, policies and regulations." We found no reference to this Order, or the phrase "cooperative collaboration" in the Draft WOPR. Frankly, we found it unsatisfactory that the word 'collaboration' was only used in the Draft WOPR in the context of cooperating agencies, or in dealing with OHV use.

Title 1, Congressional Declaration of National Environmental Policy Sec. 101[42 USC § 4331] subsection (c) states, "The Congress recognizes that each person should enjoy a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment." The second priority in the Bureau of Land Management's Vision, Mission, Values and Priorities statement clearly

addresses community involvement as a priority. In the recently-completed document entitled *"BLM Partners for a Purpose"* it states *"Purpose – To develop and implement a strategy for enhancing the Bureau of Land Management (BLM) capacity to manage public lands and deliver services for the American people. Given our current challenges and the proven success of effective partnerships, Oregon/Washington will seek and strategically utilize partners and volunteers."* We suggest that working with the Applegate Partnership is an excellent opportunity to achieve these goals in the Applegate Watershed.

And finally, in 2002 Interior Secretary Gale A. Norton expounded upon the "4 Cs" – "Consultation, Cooperation and Communication all in the name of Conservation." Again on September 7, 2005, she noted in her *Public Lands USA: Use, Share, Appreciate Cooperating to Conserve the Nation's Resources* statement, "I believe that handshakes of agreement produce far better results than heavy-handed mandates. The President and I want you (the public) to be involved with the process of conservation. We will continue to empower you when you do." While there is no mention of these concepts in the Draft WOPR, the Applegate's collaborative land management has put these words on the ground time and time again. In requesting the BLM to acknowledge the Applegate as unique, *we are asking you, the BLM, to be as involved in the process of cooperative conservation as we in the Applegate are.*

2.0 The Klamath-Siskiyou Province¹

The Klamath–Siskiyou Province is unique and different from most of the O & C lands and this diversity must be acknowledged in the BLM chosen WOPR alternative; to not do so would be ecologically (and therefore economically) irresponsible.

Agency personnel and southwest Oregon locals have known for some time that southwest Oregon with its Mediterranean climate and unusually diverse and aged geology does not well respond to harvest strategies developed and used in adjacent ecosystems in the temperate ecosystems to the north. Together we have traditionally coupled professional expertise and local experience to collaborate and adapt state of the art science and modeling for the benefit of the ecosystems and local communities.

The Applegate Watershed, a microcosm of southwest Oregon diversity, hosts Port-Orford-cedar and tanoak on its west edge, representatives of the coastal marine influence. In contrast, a variety of true oaks and pines thrive on the eastern extremes and on low elevation shallow soils and sometimes ultrabasic soils where they are competitively dominant, and surprisingly productive. The combinations of climatic influences provides varied habitat that is subject to all classes of fire regimes.

Consequently, the Applegate has enjoyed, along with the Siskiyou, the reputation of being one of the most floristically diverse watersheds in the world, particularly with reference to its conifers. The residents take pride in its diversity and beauty as well as their long-time involvement in the stewardship of its sustainability and resilience. We jointly agree that achieving a major goal of the WOPR, healthy social and economic communities, depends on maintaining healthy and viable ecosystems.

Less commonly known is that southwestern Oregon has been, until recently, comparatively free of insect and disease epidemics. Conventional wisdom and several

¹ Much of this section is from testimony by Thomas Atzet, Ph.D., in a Congressional Hearing by the Forests and Forest Health Subcommittee and the Committee on Resources, Feb. 14, 2006, Medford, OR.

scientific studies theorize that both species diversity and frequent fire has been instrumental in prevention. The fact that fire is so frequent and universal indicates that the system is both productive and resilient. Fire needs fuel to burn; our ecosystems are capable of rapidly and repeatedly producing fuel, including a variety of sprouting hardwoods and shrubs, to assure the ecosystem is judiciously reset and sanitized. Ours is a dynamic system that evolved with frequent and sometimes intense disturbance; a high degree of protection is likely to be counterproductive to resilience, resistance, long-term health and natural selection. As such, it is a prime candidate for active management. It is probable that trying to protect the system from fire may be more costly and environmentally unsound than working with nature to incorporate frequent disturbance and renewal through mortality, growth and regeneration.

In addition to the exclusive conifers of the Klamath-Siskiyou Province, there is also a complement of rare plants and animals. Rarity is always prized. And although active management is indicated, caution and deliberation is needed to assure maintaining the viability of the rare. This is why our partnership with the agencies and universities has been so fruitful and critical. Traditional strategies, tools and applications have been put under the imaginative eye of experimentation and adaptation. This partnership and integration has been well accepted and can continue to be a social and ecological asset. The objective has been to nurture creativity, involve the community and keep the decisions out of the courts. *Applegate citizens have been active players; sitting on the bench is not an option.*

Another conspicuously absent piece in the Draft WOPR is the issue of global climate change. The BLM is aware of this issue and will undoubtedly rectify this shortcoming in the final version of the WOPR, but we would point out that it is imperative that changing climate be factored into the management of all forested landscapes, particularly in transition zones similar to southwest Oregon's fire adapted ecosystems. Global climate change begs for rigorous analysis and the Applegate's proposal should be acknowledged as a process that at least moves us in the right direction for long term sustainability of unique landscapes under increased climate change stresses.

The Applegate Partnership recognizes the timber management mandate of the 1937 O & C Act. We expect the BLM to harvest timber on Applegate O&C lands, but not at the expense of our bio-diversity, quality of life, and not such that fire resiliency is lost. Plantation-like, even aged management is inappropriate in the Applegate; it fosters fire prone forests, spreads noxious weed and fosters degradation of our biologically diverse ecosystems.

We would like to close on this issue with the sage words spoken by Abraham Lincoln in the 1800's that apply equally well to today's issues, "You cannot escape the responsibility of tomorrow by evading it today."

3.0 Historical Recognition of the Applegate

We would again like to provide our social/community component background, to give context to the proposal that we submitted to you in October, 2005. The Applegate Partnership began in 1992, and since then has received state, national and international recognition for our collaborative land management work.

We have hosted the Secretary and Under Secretaries of the Departments of Interior and Agriculture, numerous agency dignitaries from Washington DC, Governors,

Congressmen, Senators, international leaders, foundations, environmental organizations, timber industries, media representatives, universities and many individuals and/or organizations from around the country. We have hosted visiting leaders from China, Bosnia, France, Germany, Russia, Japan, Mexico, Chile, Argentina and Brazil. They *all* came to the Applegate to more closely study our community collaborative process in action.

We have been invited to meet with two Presidents (one Republican and one Democrat), three Chiefs of the Forest Service and two BLM Directors. We've attended two planning sessions in the administrative wing of the White House, testified before Congress on numerous occasions, and participated in many administration and agency presentations in Washington DC. The Applegate Partnership's leadership of Jack Shipley was recognized during the United States Forest Service's Centennial Celebration, with the first-ever *National Community Leadership Award*. During Oregon's 150 Year Celebration, *The Oregonian* newspaper recognized Jack as one of 150 "Luminaries" in Oregon's history for work accomplished by the Applegate Partnership.

Our environmental partners abandoned us during the years when the Democrats occupied the White House, and our timber industry partners abandoned us during the years the Republicans occupied the White House. This political "on again, off again" participation by the "communities of interest" illustrates how fickle special interest groups are, based on which way the "wind is blowing" inside the Beltway.

This inconsistent behavior by special interest groups is a compelling reason for land management agencies to recognize and embrace "communities of place" (like the Applegate Partnership) who desire the consistency and continuity necessary for quality natural resource management on public lands in and around their communities.

The Applegate Partnership, through the Applegate River Watershed Council, has been recognized for its stellar work on natural resource restoration projects both on public and private lands to the tune of somewhere between \$500,000 and \$750,000 annually since 1995. And, through the efforts of the Applegate Fire Plan, more than \$1.3 million in grant funding has come into the Rogue Valley for hazardous fuels mitigation and fire prevention. This, and our successful restoration and monitoring program illustrates that "we perform", and are not just talking out of our hat.

It should be noted that the Applegate Partnership is a volunteer Board and all travel expenses for our public involvement are paid by the participating members and not out of some organizational travel fund.

In Closing

There has been ample recognition that partnering plays an important role in public resource management. The notations above are compelling statements that illustrate the need for federal agencies to embrace public involvement, but the absence of reference to them within the Draft WOPR is disturbing. We feel the WOPR *is* the appropriate place to put into action the community involvement component that the agencies have espoused time and time again.

The Applegate Partnership and its involvement with local federal agencies in the Applegate AMA has been a stellar example of a community attempting to participate in

the civic discourse as identified by NEPA, the Secretary of the Interior and the agency priority statement. We feel it is imperative that the special nature of the Applegate Watershed and desired collaboration by the Applegate Partnership be acknowledged in the WOPR as having special geological, ecological and social significance, and that the detailed *designation* of such will be developed between the Applegate Partnership and the District Manager when the Medford RMP is developed. *Additionally, we request this be done before the local District managers and Resource Area managers move on to other positions.*

Thank you for the opportunity to comment on the Draft Western Oregon Plan Revision. We eagerly await your proactive response to our input and request.

Respectfully submitted,

Jack Shipley, Chair
Applegate Partnership Board of Directors
6941 Upper Applegate Road
Jacksonville, OR 97530

CC: Tim Reuwsaat, Medford District Manager
Dirk Kempthorne, Secretary of the Interior
Jim Caswell, Director, BLM
John Gerritsma, Ashland Resource Area Manager
Senator Ron Wyden
Senator Gordon Smith
Congressman Greg Walden

Attch: Addendum A

Applegate AMA Collaborative Watershed Restoration Proposal: Addendum A

This list illustrates the level of participation the Applegate Partnership has been involved in the Western Oregon Planning Revision process.

- October 19, 2005 (Applegate, Oregon): The Applegate Partnership submitted the *Applegate Adaptive Management Area Collaborative Watershed Restoration Proposal*
- June 15, 2006 (Corvallis, OR): Five Applegate Partnership members participated in BLM's WOPR, State-of-the -Science Review Workshop at Oregon State University.
- July 17, 2006 (Medford, OR): Four Applegate Partnership members met with Medford District Manager Tim Reuwsaat & staff to review & expand on our Proposal.
- August 22, 2006 (Redmond, OR): Applegate Partnership testifies before Secretary Kempthorne & Washington DC staff concerning the Applegate WOPR Proposal.
- August 31, 2006 (Portland, OR): Four Applegate Partnership members make presentation of the Applegate Proposal to the BLM State Director Brong & WOPR Team.
- February 09, 2007 (Medford, OR) Applegate Partnership Board makes presentation of our Proposal to the BLM State Director Shepard & Medford District Leadership Team.
- April 27, 2007 (Applegate, OR) Four Applegate partnership members meet with BLM Area Manager and staff to review BLM/Applegate Partnership MOU & the WOPR.

Spotted owl plan under fire

Threatened species' recovery could be set back decades, eco group charges

By **BILL KETTLER**
Mail Tribune

OCT 3, 07

More than 100 scientists called on the U.S. Department of the Interior Tuesday to scrap its draft recovery plan for the northern spotted owl, suggesting political pressure produced a plan that would open more federal forest land to logging.

At the same time, 23 members of Congress sent their own letter to Interior Secretary Dirk Kempthorne, asking him to dismiss the draft plan and assemble a team of independent scientists to redo it.

The owl is a threatened species under the Endangered Spe-

cies Act. If implemented, the plan would alter forest management in Washington and Oregon because it would open more federal forest land to logging, said Dominick DellaSala, executive director of the Ashland-based National Center for Conservation Science & Policy.

DellaSala said both options being considered in the draft plan would reduce by one-quarter to one-third the amount of old-growth forest currently protected for owl habitat. He said if the plan were enacted it would effectively dismantle the Northwest Forest Plan, which has been the guiding document for forest management in the region since the mid-1990s.

The recovery plan "has a failing grade within the scientific community," DellaSala said in an interview.

DellaSala testified about the inadequacy of the draft plan in May, when he appeared before the House Natural Resources Commit-

tee on Capitol Hill. His signature was at the top of the list of 113 scientists who signed the letter.

Their letter notes that Fish and Wildlife policy requires recovery plans to be based on the "best available science," but the plan seems to conflict with scientific findings.

"Based on our understanding of the ecology of the spotted owl, we see no scientific basis for either reducing habitat protections for the owl ... or departing from a conservation strategy that is rooted in the fixed reserves (for owl habitat) of the Northwest Forest Plan," the scientists' letter says.

David Wesley, deputy regional director for Fish and Wildlife's Pacific region and recovery team leader for the spotted owl, told the Associated Press that the scientists' figures were "speculation on their part. I'm concerned about what's right for the owl."

see OWL, Page 3B

Owl

from Page 1B

Five independent peer reviews of the plan, funded by the U.S. Fish and Wildlife Service, also suggest it downplayed the need to protect old-growth forest to preserve habitat for the owl. A sixth independent review conducted by The Wildlife Society determined that the plan "would reverse much of the progress made over the past 20 years to protect this species and the habitat upon which it depends."

Correspondence from the Environmental Protection Agency also expressed concerns that the plan would degrade water quality and the agency's ability to implement the Clean Water Act.

The Congress members' letter notes that the recovery plan is linked to the Bureau of Land Management's proposals to increase logging in Western Oregon.

The Congress members' letter notes that the recovery plan is linked to the Bureau of Land Management's proposals to increase logging in Western Or-

gon. Those BLM lands include thousands of acres in a checkerboard pattern across Jackson and Josephine counties.

"The proposed options are not supported by any reasonable interpretation of the best available scientific information," the letter says.

All 23 signers of the letter were Democrats. Rep. Earl Blumenauer was the only member of the Oregon delegation to sign the letter.

DellaSala said if the plan is approved as written it would open so much more old-growth forest to logging that it could ignite a new era of conflict over forest policy.

"This thing is headed for a train wreck," he said. "If we go back to the timber wars of the

1990s we all lose."

The letters come just as the public comment period for the draft plan is coming to a close. The Interior Department will accept public comment on the plan through Friday.

Wesley, the regional Fish and Wildlife director, said the Interior Department has received more than 80,000 comments on the plan, and is reviewing them along with the peer reviews. "I understand where they say we erred," he told the AP. "I'm more than happy to go back and look at it."

Reach reporter Bill Kettler at 776-4492 or e-mail: bkettler@mailtribune.com

The Associated Press contributed to this story.

Mail Tribune

The Mail Tribune offers its opinion pages to stimulate discussion and understanding of issues important to our community. Editorials in this column reflect the opinions of other Oregon newspapers.

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OREGON EDITORS SAY

Ignoring science invites lawsuits

Timber counties will suffer if owl plan, WOPR are litigated

The (Roseburg) News-Review

SwEEPING changes recently have been proposed to the way Oregon's federal forest lands are managed and the manner in which threatened species such as the northern spotted owl are recovered.

The Bureau of Land Management is working on its Western Oregon Plan Revisions (WOPR) at the same time the U.S. Fish and Wildlife Service is revising strategies for reviving the spotted owl.

Counties such as Douglas that historically have depended on revenue from timber harvests for vital public services, not to mention jobs, should welcome any plan that gets us back in the woods while preserving our natural resources. But it's worrisome to learn the Fish and Wildlife Service's Draft Recovery Plan for the northern spotted owl recently bombed in a review by independent scientists. The BLM is relying upon the plan to guide its land-management decisions as it seeks to ramp up logging.

Scientists with The Society for Conservation Biology and The American Ornithologists' Union were asked by Fish and Wildlife to review its Draft Recovery Plan. All four who reviewed the plan were skeptical about the two options for recovery of the spotted owl, and questioned whether "the best available scientific information" had been used, as is required under the Endangered Species Act. Additionally, more than 100 scientists and 23 members of Congress recently urged the agency to scrap the plan and start anew.

Considering the extent to which environmentalist lawsuits have tied up timber sales, it's difficult to imagine how a recovery plan that doesn't take all the available science into consideration is likely to avoid lawsuits.

Plans such as the WOPR are being counted on to replace county safety net funds whose future is, at best, uncertain. But if the hoped-for timber sales are forever tied up in litigation, county coffers will still be left bare.

The Fish and Wildlife Service announced last week it had disbanded the original work group that came up with the Draft Recovery Plan. In its place, a private contractor will sift the estimated 80,000 comments the agency has received on the plan, while three work groups will focus on key areas of spotted owl recovery: fire, habitat management and barred owls.

Let's hope this new tack helps the agency come up with a more scientifically sound approach to spotted owl recovery rather than providing more fodder for lawsuits.