



MEMORANDUM

To: Obama Transition Team
From: Oregon Heritage Forests Campaign¹
Re: BLM's Western Oregon Plan Revisions
Date: 17 November 2008

Background on the Western Oregon Plan Revisions

The Northwest Forest Plan is a comprehensive, long-term management plan that contains standards and guidelines for managing Forest Service and BLM lands in Washington, Oregon, and northern California in the range of the threatened Northern spotted owl. The NWFP is based on extensive scientific research by a highly credentialed team and was jointly adopted by the Forest Service and the BLM in 1994. The NWFP was upheld by federal courts in challenges both from the timber industry and from conservation groups.

Immediately following its adoption, timber industry groups filed a lawsuit ([AFRC v. Clarke](#)) in the U.S. District Court for the District of Columbia challenging the plan. Almost a decade later, following two rulings by the district court dismissing the industry claims – while an appeal to the D.C. Circuit was pending – the Secretary of the Interior entered into a settlement agreement with the timber groups. Under the 2003 settlement agreement, BLM agreed to revise its resource management plans in western Oregon and agreed to consider substantial increases in the land available for timber harvest. The settlement agreement is available at:

www.blm.gov/or/plans/wopr/settlement/files/settlement_agreement_image.pdf

In the 2003 agreement, BLM committed to finalize its revision of the resource management plans for the six Western Oregon districts by December 31, 2008. BLM began the process of revising its resource management plans in western Oregon with a formal scoping process for the Western Oregon Plan Revisions (WOPR) during September and October 2005. The Draft Environmental Impact Statement was released in August 2007 and made available for public comment until January 2008. The BLM received approximately 29,500 comments on the draft environmental impact statement, the vast majority of which harshly criticized the plan for a variety of reasons. The WOPR FEIS is available at www.blm.gov/or/plans/wopr/index.php.

On October 9, 2008, the BLM released its Final Environmental Impacts Statement (FEIS) for the WOPR. The Proposed Resource Management Plan (PRMP) described in the FEIS defines a dramatic shift for Western Oregon BLM by removing it from the science-based management of the Northwest Forest Plan. This shift in management is based on the Bush administration's new interpretation of the 1937 Oregon and California Lands Act (O&C Act) as a timber dominant statute, elevating timber production above maintaining

¹ Oregon Heritage Forests is a coalition of BLM neighbors and conservation groups in western Oregon concerned with the WOPR. Contact Joseph Vaile (541) 488-5789, joseph@kswild.org for more information. www.oregonheritageforests.org



clean water, fish habitat, the value older forests provide for their carbon storage capacity or recovering endangered species.

Summary of the WOPR PRMP

Harms Water Quality: The WOPR would remove 130,000 acres of protective streamside buffers, known as riparian reserves. Aquatic Conservation Strategy (ACS) objectives of the Northwest Forest Plan related to stream process and function are eliminated. The ACS was developed to improve and maintain the ecological health of watersheds and aquatic ecosystems associated with Pacific salmon. The PRMP will result in almost 1,300 miles of new roads where there is already a backlog of crumbling logging roads known to harm watersheds and already at-risk salmon runs.

Threatens the Climate: The WOPR massively undervalues the contribution of western Oregon's ancient forest ecosystems to carbon sequestration. It fails to consider the best available and most current science on this issue. Over the next 100 years, the PRMP will result in 180 million tons more carbon in the atmosphere compared to a "no harvest" alternative. This is the equivalent to the greenhouse gas emissions from 1 million cars driven for 132 years.

Risks Old-Growth Ecosystems: The WOPR would remove 364,000 acres of protected "Late-Successional Reserves" and re-allocate these lands so that logging will be the dominant use. Logging would increase by more than 400% from current levels and 71% of the volume would come from clearcutting. These clearcuts would mar the landscape and further threaten old-growth dependant species. Complex forest ecosystems that are already struggling to recover after decades of over-harvest would be converted into tree farms that are biologically deficient and more susceptible to unnatural fire behavior.

One Step Forward, Three Steps Backwards: The adoption of the 1994 NWFP was an unprecedented landscape-level management decision for the Pacific Northwest. The WOPR is an outdated and simplistic approach to a complex social and environmental issue and represents a failure of national leadership. By effectively removing BLM forests from the NWFP, the WOPR risks unraveling this scientific and legally defensible plan. National forests and rural communities require 21st century solutions. Economists and ecologists agree that national forests need a restoration program that creates jobs by thinning small trees, removing unnecessary roads, using controlled fire and recovering struggling salmon runs. Treating national forests as tree farms negates the enormous value these ecosystems play in providing clean water, stabilizing the climate, supplying fish and wildlife habitat and offering future generations a natural refuge.

How to Change Course

The Bush administration plans on issuing six Records of Decision implementing the WOPR in December of 2008. We urge an immediate halt to implementation of the WOPR based on lack of ESA consultation. Then issue a new Record of Decision adopting the no action alternative and upholding the scientific integrity of the Northwest Forest Plan. This may require the development of a new record in a supplemental EIS.