

Data Submitted (UTC 11): 8/11/2022 4:00:00 AM

First name: Joseph Patrick

Last name: Quinn

Organization:

Title:

Comments: Dear Deputy Chief French and Director Stone-Manning:

I feel increasing despair about the rapidly deteriorating condition of our natural world and its capacity to sustain the wide variety and abundance of life, including human life, that we have long been accustomed to, here on Planet Earth. That said, I am not without hope, and with that hope in mind, I write to you today concerning the pressing need to conserve all that is possible of the primary old growth and mature trees still extant on our precious public forestlands.

Christopher and Tracy, with your extensive education and experience, with your obvious dedication to public service, I know that you are keenly aware of the vital part our nation's remaining older trees, whether as individual stems, or contiguous in older stands, play in the mitigation of onrushing, anthropocentrically influenced climate disruption. As you know, these older, sometimes ancient, trees absorb carbon dioxide at many times the rate of younger stems. And, their capacity to store this gathered carbon for decade after decade, century following century, is unsurpassed. This is not to downplay the vital part primary forests, stands and stems, play in assuring abundant clean water, air, biodiversity and yes, aesthetic, even spiritual blessings on we human beings and our societies.

Here in western Oregon, roughly 90% or more of the once nearly ubiquitous primary old-growth/mature forest has been felled and removed. This "great falling" of primary forest occurred in the decades before the adoption of the Northwest Forest Plan Amendment, and across all ownerships, including, on the public lands under management authority of the USFS and the BLM. Today, the forested holdings of the several districts of the BLM in western Oregon are often sited within what is euphemistically called the "checkerboard" of alternating ownerships. That is, quite often every other section is owned and managed by private industrial timber entities, which are increasingly constituted as Real Estate Investment Trusts (REITs) or Timber Management Organizations (TMOs).

The operations of these interspersed private sylvan behemoths are "regulated" under aegis of the environmentally retrograde Oregon Forest Practices Act (OFPA). Typically sited directly adjacent or proximate to public lands of the BLM (and, in some cases, of the USFS et al.), these "fiber farm" plantations are "managed" on a short (and sometimes shortening) 40 or so year rotation between clear cuts, road building, extensive aerial herbicide spraying and dense monoculture restocking. Short shift is accorded to natural function thereon. Management goals, kept relatively short term in order to satisfy the quarterly bottom line demands of Wall Street investors, are paramount. The long term health of watersheds and their denizens, including we humans, come last, if at all.

Across this notorious western Oregon "checkerboard" virtually the only primary forest, the only older trees one will see, explore as one might, are on the public lands managed by the BLM, the USFS and some other public management agencies. Please don't take my word for it. By way of example, just open Google Earth and in the search bar of that application enter "Bone Mountain, Coos County, Oregon" in order to get a bird's eye view of the not atypical legacy left behind by the now dissolved Plum Creek REIT et al. Note the remnant stands of BLM lands scattered in that ecological disaster area, some of which have been subject to varying rates of extraction, including regen., by the Coos Bay District of the BLM, in its Upper Rock Creek Harvest Plan.

And yet, in the face of undeniable and unarguably calamitous climate change, both the USFS and the WA/OR BLM continue to propose the virtual liquidation of selected primary old growth/mature stands, here in the "checkerboard" and elsewhere in Oregon. At the same time, operatives at these agencies are well aware of just

how dismissive of (and contributive to) that existential threat (as well as deteriorating natural systems in general) these private forestland ownerships too often are. The clear cut practices of these REITs and TIMOs may well be described as environmentally barbaric. Hyperbole? Not once one has seen what this management paradigm looks like, on the ground!

A glaring example of a recent regeneration harvest (read clear cut "lite") proposed by the South River Field Office of the Roseburg District of the BLM is the MITA regen. tentatively slated for Township 29S, Range 8W, Section 7. (N.B.: MITA allows the BLM to extract stems that are <40" dbh and which have not sprouted before 1850! Outside of riparian reserves that are often only half the width they were under the Northwest Forest Plan, a miserly 5 to 15% of pre-harvest basal area is to be retained, overall. These parameters potentially doom countless trees that are 100, 200, 300 or more years old!) I have endeavored, over a number of years, to get the BLM to acknowledge and correct silvacutlural mapping errors on this section, which borders my home. Instead of indicating the several stands of primary o.g./mature trees intermingled with a decades old clear cut on district maps and in management descriptions, the Roseburg District persists in lumping them together with the "dog hair" regrowth left behind following BLM's clear cut operations here sometime in the the early 1960s and/or early 1970s. (Please see the attached Scoping Comments for 29-8-7, a portion of RBBLM's 42 Divide proposal.)

It is cavalier extractive proposals such as this, taken one after another, that amount to a significant further cumulative depletion of carbon sequestering and storage capacity, not to mention the further degradation of already severely impacted natural systems. In short, given the existential threats represented by the on-rushing climate emergency and the frightening destruction of biodiversity and natural function in general, such heavy-handed actions are confounding if not outright shameful. At the very least, primary stands (and stems) >80 years old must be conserved at this time. Our very lives and the welfare of our progeny as well as of the too often voiceless denizens of our once awesome watersheds deserve no less.

I have included with this a copy of the Scoping Comments I filed last December with the Roseburg District bearing upon its proposal for Twp29S, R8W, Sec.7. I feel the facts and sentiments expressed therein are generally applicable across the board, if not across the nation. From those comments, I offer this excerpt: "More than 150 years ago, our nation was enmeshed in 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.'" Indeed!

SCOPING COMMENTS FOR THE 42 DIVIDE PROPOSAL AS IT RELATES TO TWP29S-R8W-SEC 7 (DOI-BLM-ORWA-R050-2022-000 1 -EA)

IMAGE: see page 1 of 15

Dear Sarah Bickford:

Please accept these Scoping Comments related to a portion of the 42 Divide proposal (DOI-BLM-ORWA-R050-2022-000 1 -EA). Of course, at this time, I do not know what the final management plan will be for this section. Nonetheless, these comments are directed specifically toward the MITA regeneration extraction proposed for Township 29S, Range 8W, Section 7. That is: MITA, the most heavy-handed extractive model allowed by the 2016 RMP (aka WOPRjr.) appears to be indicated across BLM's holding on section 7, if however tentatively, on Map #3, included with the 42 Divide Scoping Announcement, dated November 8, 2021.

(Please note: these comments and included documents are being submitted on behalf of myself and my family, by me, under my name, as an individual citizen and adjacent property owner located within section 7. Although points raised in these comments may well have wider application on the 42 Divide Assessment Area, at this time

they are not meant to represent any other individual or organization, nor should they be received and read as such. With that disclaimer in mind, please direct any communications regarding these comments to the address in the heading above.)

In company with these comments, and central to their relevance, I have included copies of the following documents etc.:

- 1) A copy of a letter sent by me to Ms. Kristen Thompson, dated October 11, 2019
- 2) A copy of a letter sent to me on behalf of Ms. Sarah Bickford, dated January 24, 2020
- 3) A copy of a letter sent by me, in response, to Ms. Sarah Bickford, dated January 29, 2020
- 4) A copy of a letter sent by me to the Protest Coordinator, dated April 26, 2016
- 5) The folder, Documents for Protest, 29-8-7
- 6) The folder, Photos for 29-8-7, Plan Amendment Petition
- 7) A copy of a cover letter for A Petition for a Plan Amendment, sent by me to Mr. Mark Brown, dated January 5, 2017
- 8) A copy of the COP 26 Forest Climate Sign-On Letter, dated October 28, 2021
- 9) Beverly Law, phd testimony before a committee of the U.S. Senate, November 18, 2009
- 10) The folder, Communications Protest-RMP Amendment

(Note: #6, Included folder, Photos for 29-8-7, Plan Amendment Petition. is available on the thumb drive, included with the hard copy of these Scoping Comments.)

#### Actions Taken Regarding Mapping Errors on 29-8-7

Note Well: I have had direct communication with BLM, oral and written, regarding the existence of these old growth/mature stands for a number of years. The cartographic errors that have persisted in omitting these stands on 29-8-7 from BLM maps have been the principal focus of written submissions to BLM. Many of these communications were made well before adoption of the 2016 RMP.

- 1) ACEC Nomination filed with BLM, December 1, 2005

(see #9 within included folder #5, Documents for Protest)

- 2) A letter sent by me to Steven D. Lydick, South River Field Director, December 26, 2013

(see # 2 within included folder #5, Documents for Protest)

- 3) A letter sent by me to the office of U.S. Senator, Ron Wyden, February 8, 2014

(see # 1 within included folder #5, Documents for Protest)

- 4) An e-mail sent by me to Steve Lydick, November 26, 2014, regarding the letter with map I mailed to him,

December 26, 2013 (#2 above)

(see # 3 within included folder #5, Documents for Protest)

5) An e-mail string including a response from Steve Lydick to me, December 3, 2014, regarding the inquiry made by me to him, November 26, 2014, (#4, above)

(see # 4 within included folder #5, Documents for Protest)

6) An e-mail sent by me to the office of U.S. Senator, Ron Wyden, December 22, 2014, regarding uncorrected map inaccuracies (see #3, above)

(see # 5 within included folder #5, Documents for Protest)

7) An e-mail sent by me to Mr. Abe Wheeler, RMP Plan Forester, May 12, 2015, regarding unresolved mapping errors on 29-8-7, and including a map I made of those older stands

(see nos. 6 & 7 within included folder #5, Documents for Protest)

8) An e-mail response sent to me by Mr. Abe Wheeler, May 12, 2015, including a LIDAR image of 29-8-7, clearly showing the old growth/mature stands, thereon

(see nos. 8a & 8b within included folder #5, Documents for Protest)

9) Comment filed through the comment portal of the RMP deis Interactive Map regarding mapping errors on 29-8-7 (see #10, below)

10) An e-mail string between myself and Sarah Levy et al., April 19, 2016 regarding a comment filed through the deis Interactive Map comment portal

(see nos. 1 & 4, within included Folder #10, Communications for Protest)

11) A Protest filed with the Protest Coordinator, April 26, 2016, regarding persistent mapping errors on 29-8-7 (see included item #4)

12) E-mail strings between myself & S. Levy, and between myself & C. Rossbach & M. Williams 8-12-16, 8-31-16 (see nos. 1 & 2, within included Folder #10, Communications for Protest)

12) A meeting at RBBLM, September 26, 2016. Present: myself, Cheyne Rossbach, Ms. Abbie Josie, Mr. Abe Wheeler, Mr. Craig Kintop, Mr. Chris Foster, and Ms. Michelle Roberts.

(see #4, within included Folder #10, Communications for Protest)

14) As suggested by RBBLM, I filed a Petition for a Plan Amendment, January, 2017

(see included item #7)

15) Letter sent by me to Ms. Kristen Thompson, October 11, 2019, regarding salvage on 29-8-7

(see included item #1)

16) Letter sent to me on behalf of Ms. Sarah Bickford, January 24, 2020

(see included item #2)

17) Response sent by me to Ms. Sarah Bickford, January 29, 2020

(see included item #3)

## INTRODUCTION

Of significant relevance to these comments is the fact that I and my family have resided on Twp29S-R8W-Sec7 for more than 40 years. Happily, we continue to do so. Our home is located on property we own, free and clear, that is bordered on two sides by the Roseburg BLM's Coos Bay Wagon Road (CBWR) holding, located within this same section. This is, of course, the same public land, directly adjacent to our home, which the Map #3 mentioned above, indicates is being considered, however tentatively, for MITA regeneration extraction; and, according to the coloration of that map, in its entirety. It is my understanding that MITA is the most extreme extractive model currently allowed by the 2016 RMP. And, with riparian reserves on BLM significantly reduced in size, with stems outside of a very modest 5 to 15% pre-extraction basal area green tree retention stricture, and with stems <40" dbh and which BLM does not also identify as having sprouted on or before the year 1850 subject to being felled, MITA is as close to a classic clear cut as any green tree extraction currently permissible on federally managed public lands that I know of. Within the primary old growth/mature stands on 29-8-7, which I have long-since identified, how many of the biggest trees (i.e., >40" dbh) per unit of measure would be needed to satisfy the miserly 5 to 15% retention? One, two? Perhaps unlike some at BLM, most people seeing such a thing would call it a clear cut and nothing else. A clear cut "lite" maybe, but a clear cut, nonetheless.

Various likely harmful impacts to my home and property, myself and my family, were MITA regeneration extraction to be imposed upon Twp29S, R8W, Sec7

### 1a) Maintenance of BLM Road 29-8-7

\* During the more than 40 years we have used Road 29-8-7, the sole vehicular access to our home, we have always been appreciative of the occasional maintenance work undertaken here by BLM maintenance folks. However, it is important to note that a good deal of the effort involved in keeping this road in relatively good and year round passable condition has been expended by myself and my family.

\* These efforts include the construction, by hand labor, of numerous water bars and their proper drainage. (Unfortunately, a number of these water bars were torn out during the salvage operation referred to in included items nos. 1, 2 and 3.)

\* Likewise, the excavation and reconstruction of an original poorly constructed portion of this road was undertaken by myself, using pick, shovel, wheelbarrow, pickup truck and various materials, all supplied by me. (Unfortunately, this repair was partially damaged during the salvage operation referred to in included items nos. 1, 2 and 3.)

\* Regular excavation, by me, of drainage ditches with pick, shovel and wheelbarrow.

\* Occasional purchase, hauling and placement, by myself and my sons, of crushed rock, using my pickup truck, shovels and wheelbarrow, time and energy.

### b) Impacts to BLM Road 29-8-7 from MITA regeneration extraction & associated activities

\* Possible structural damage done to this road, and to my maintenance efforts over years, by the kind of heavy hauling associated with large scale logging operations.

\* Interruptions to my own and my family's ingress and egress by various machinery and transport vehicles. Such interruptions, although one would prefer to think them unlikely, might delay, or even prevent, necessary or even

timely emergency medical, fire, or other needed aid. Likewise, ingress and egress for employment or the delivery of goods might well be delayed or prevented by the activities and traffic associated with regeneration or other extensive extraction.

2) Greater resistance of older forests vs plantations to the severity of wildfires and the rapidity of wildfire spread

Sited within the WUI, it would be ill-advised of BLM to replace, via MITA or other extensive extraction, structurally complex older and other stands with a relatively heavy restocking of seedling firs etc. By BLM's own admission, such an action would very likely increase the threat from wildfire to adjacent homes and properties, including my own. (see #2, page 11 of these scoping comments)

3) Potential adverse impacts to surface and ground water, quantity and quality

Removal of older stands and their replacement with young, plantation style restocking is likely to have an adverse impact on surface and ground water, including our own well and those of our neighbors, as well as the already drought-challenged summer flow in the adjacent Middle Fork of the Coquille River. I have kept an extensive vegetable garden and a small apple orchard for 40 or so years on this property. A diminution in the capacity of our well to supply domestic needs or to provide needed irrigation during the increasingly hot and dry months of our climate-changed year will very likely impose economic, health and even emotionally damaging impacts on myself and my family.

(see #3, page 12 of these scoping comments)

4) Impacts to recreation by imposing MITA or other extensive extraction on 29-8-7

Such extreme management activity as MITA would most certainly badly degrade the close-by, "walk-to" recreation opportunities enjoyed for more than 40 years by myself and my family, as well as for numerous other citizens, who have and continue to enjoy and benefit from outdoor activities on 29-8-7. In particular, the primary old growth/mature stands I have striven to bring to BLM's needed attention and to conserve are not a common feature on public, or any, forestlands in the immediate vicinity. Folks, including myself and my family, have enjoyed and benefited from the opportunities afforded on 29-8-7 to stroll, collect mushrooms, take photographs, hunt etc. as well as to simply and healthfully enjoy the aesthetic pleasures of these stands of older and heretofore unlogged trees.

(also, see #9, ACEC Nomination, within included folder #5, Documents for Protest)

IMAGE see page 5 of 15

5) Likely adverse impact of MITA or other extensive extraction on 29-8-7 to our property

value. It stands to reason that surrounding our home and property on two sides with what, for all practical aesthetic (and environmental purposes), amounts to a clear cut, can only badly impact the value of that home and property, much to the detriment of myself and my family, now and well into the foreseeable future.

6) Danger imposed upon ourselves, our home, our property and personal safety by possible wind throw, devolving from the removal, by MITA or other extensive extractive action, of the forest cover on the surrounding public lands of 29-8-7 Situated, as our home is, on the second highest ground present on section 7, the threat of wind throw subsequent to MITA, or other extensive removal of forest cover, especially of nearby older stands, would very likely imperil our home and our growing trees, as well as our very safety. MITA or the like action would also leave our garden and growing trees subject to increased strong and increasingly hotter winds, leading to unwanted drying of soil, needle and leaf etc, likely amplifying the already considerable detrimental impacts of

long-term drought.

## BACKGROUND

### Concerning the 2016 RMP

Tiering briefly to the 2016 RMP: while in my former capacity as Volunteer Conservation Chair for Umpqua Watersheds, Inc., I filed several NEPA submissions: comments, a protest etc. emphasizing, among other concerns, the inadvisability, at that time (as at present), of BLM turning its back, in effect, on the Aquatic Conservation Strategy of the Northwest Forest Plan; as well as the likely damaging environmental impacts of a reintroduction of regeneration extraction on the land it administers, in trust, for all of the people of the United States.

Broadly speaking, there were two overarching reasons for such concern. First, the historical management context surrounding, and bearing directly upon, BLM forestland management in western Oregon. That is, in the decades preceding adoption of the Northwest Forest Plan, primary old growth/mature stands were clear cut with abandon across all ownerships, public and private, including from lands administered by the USFS and the BLM. Just one, among several, glaring results of this ill-advised mass extraction is the current paucity of old growth/mature stands in the Oregon Coast Range, in general, and on BLM holdings, in particular. The fall out from this "get rid of the decadent old growth, replace it with vigorous young plantations" madness is well evidenced by diminished and extirpated species, aquatic and terrestrial. It is revealed by the reduced summer flows this extraction bears some significant blame for.

Second, the management context current on so much of the private industrial timberlands adjoining or proximate to those lands managed by the BLM, in western Oregon. In many, too many instances, one need only to step across the property line between BLM and private industrial timberlands to see the import of what the Oregon Forest Practices Act (OFPA) has for far too long, and continues, to allow; i.e., to have the clear cut barbarity present thereon slap one full in the face. The environmental degradation condoned and even encouraged by the OFPA spills over those property lines onto the adjoining public lands managed by the BLM. There is no denying this, it is fact and never simply opinion. If nothing else, the resultant fragmentation, alone, ought to have been reason enough for the BLM planning team et al. to think carefully about further damaging already impacted catchments by means of the imposition, by public land managers, of yet more relatively large canopy openings, within the infamous and most unfortunate checkerboard of alternating ownerships, however euphemistically they might be labeled.

In the end, when it came to a renewal of regeneration extraction, the 2016 RMP planning team et al. appears to have brushed the overall degraded condition of so many of the watersheds of western Oregon aside, perhaps from inappropriate political pressure or from the outdated management purview of certain agency operatives, or? I do not know. In my reading, this amounted, in the end, to a tacit admission that so many of these lands were and remain, in effect, environmental sacrifice zones. For my part, in trying to prevent a return to such anachronistic management practices, on behalf of myself, my family and friends, as well as the too often voiceless non-human denizens of these once breath taking landscapes, perhaps I was simply jousting windmills? Perhaps. However, I do not regret those good faith, if quixotic, efforts. I only regret that my efforts fell short of the mark.

### LEGACY STANDS, NOT INDIVIDUAL LEGACY TREES

As stated by me in several previous submissions to the BLM et al., both NEPA documents and otherwise, which range in date from 2013 to the present (see page 3 of these scoping comments), but also, in a general way, by the ACEC nomination I submitted to the BLM, in 2005 (see #9 within included folder #5, Documents for Protest):BLM's maps and various descriptions relating to the remaining primary old growth/mature stands and

their distribution on the Coos Bay Wagon Road holding (CBWR) 29-8-7 were in error. And, judging by the uniform coloration of Map #3, attached to the 42 Divide Scoping Announcement (11-8-2021), this still appears to be the case. That is, this scoping map #3 omits, as other BLM maps before it, the remaining primary old growth/mature stands extant on 29-8-7.

N.B.: I emphasize the word "stands" here, as opposed to use of the word "trees," as that word is used by BLM in the excerpt of the below letter sent to me and dated January 24, 2020; this emphasis, so as to reiterate an important point. To wit: from the first page of that letter, sent me by BLM, on behalf of Ms. Sarah Bickford, South River Field Manager, one reads the following: "Within Section 7 there are older trees interspersed with younger stands. Map 2 displays an area you have identified as having older trees that the BLM has delineated, based upon your request, using LIDAR (Light Detection and Ranging) imagery. However, across BLM lands in Oregon, having small inclusions of older trees in younger stands is relatively common." (emphasis J.P.Q.)

It is obvious that the above-referenced BLM LIDAR image (see #8b within included folder #5, Documents for Protest, 29-8-7) most emphatically does not simply show older trees dispersed among younger stands, as Director Bickford appears to maintain in her letter to me of 1-24-21. No, that LIDAR image most definitely, and quite clearly, as I believe, to the unbiased eye, shows older unlogged primary forest stands dispersed among younger, formerly clear cut stands! This condition is one that ought to have been represented on all BLM maps, just as it is on the aforementioned LIDAR, and as it is on the diagrammatic maps I submitted with various comments, a protest, a petition for amendment, and now in these Scoping Comments. (see page 1 of these Scoping Comments)

Furthermore, it appears to me, based upon Mr. Abe Wheeler's communication with me (see #8a within included folder #5, Documents for Protest, 29-8-7), to have been his interpretation of that LIDAR image, as well. Signing himself as the "Plan Forester," Mr. Wheeler, in part, said this in response to my communication with him in that same #8a: "Usually taller trees are older, so your map is a pretty good representation, but actually an underestimate of where the older trees reside." Note well: "an underestimate," this agency forester has stated. (see page #1 of these comments) Also of note: both this LIDAR image and the accompanying e-mail to me from Forester Wheeler were included in the Protest, regarding 29-8-7, that I filed with the Protest Coordinator, April 2016 (see included item #4), as well as in the Petition for a Plan Amendment, sent to Mr. Mark Brown et al, January 2017 (see included item #7).

As Ms. Bickford appears to contend, in the letter dated 1-24-2021, sent to me on her behalf, and as I have personally observed over the years, there are indeed older, individual "legacy" trees dispersed among countless old BLM clear cuts. (Counter intuitively, some of these old clear cuts that I have visited are listed by BLM as Late Successional or Riparian Reserves, although the so-called "dog hair," long-neglected condition of these, perhaps erstwhile, reserves currently appears to belie their official reserve designations. In my estimation and, I assume, in that of others perhaps more qualified than I, some "light-handed" and true, science-based, restorative work within such erstwhile reserves might well be appropriate, if not long overdue. However, be that as it may.) Needless to say, it is in these young and often unkempt and overgrown stands, be they designated as reserves or so-called matrix or HLB holdings, wherein many would like to see the agency directing its limited resources. At present, there appears to be no scientifically credible need to enter, by means of regen. extraction, surviving primary stands, of whatever size, context or land use designation. Nor is there nearly enough "social license" in the general public to support still more logging of old growth/mature, stems or stands.

Occasionally, the above-mentioned individual "legacy" old growth stems provide some idea (other than what is afforded by the ubiquitous interspersed, very large old stumps, thereon) of what such once-primary stands might have looked, and functioned like, before the vaunted sustained yield management paradigm was imposed upon them, as upon countless other holdings managed by the BLM the USFS and most other ownerships, public and private, in the decades preceding adoption of the Northwest Forest Plan Amendment. Such large and very large old stumps, as well as numerous large old logs, felled and left in place or bunched into makeshift decks, bear



similar witness on the previously clear cut portions of 29-8-7, today. But this kind of legacy remnant (i.e., stumps, felled and rejected large "cull" logs or the occasional large, isolated, still standing green stem) is emphatically not what the remaining primary stands I have identified and tried to bring to BLM's attention represent. Again, those on 29-8-7 are legacy stands of primary old growth/mature. For the most part, and as the LIDAR discussed above clearly shows, they are contiguous groupings of older stems, and not, as BLM, through Ms. Bickford or her representative, seems to contend, scattered individual legacy trees. Again, the LIDAR makes that point very well, particularly in company with the whole of these and my past comments etc.

Nonetheless, from my past experience trying to resolve this lingering issue, I find it necessary to reiterate the above argument yet once more, for emphasis, as in the past it seems not to have been understood, acknowledged and acted upon, as repeatedly requested. To wit, the following is an excerpt from my response letter, of the 29th of January, 2021 to Ms. Bickford (see included item #3): "Furthermore, the statement made in the last paragraph, page 1 of BLM's letter (Sarah Bickford, 1/24/2020) concerning older trees interspersed with younger stands is largely irrelevant to the stands I have delineated on 29-8-7. I say this because as Mr. Abe Wheeler identified and explained and as stated in that letter, there are approximately two acres of LSR already identified and included on the maps. Two acres, not ten or twenty or one hundred, two. However, regarding those two acres, as Mr. Wheeler stated in his e-mail to me dated 5/12/15 (See included Items #2): "The stand east of the road with the 1780 birthdate is protected as older forest reserve under alternative B and D, but you can't see it on the spatial viewer because riparian reserves are on top." The stands I identified and mapped were clearly visible on the Lidar image sent me by Abe Wheeler. Indeed, Mr. Wheeler confirmed to me that my map was reasonably accurate. Only, he told me, I had not included all such older stands in my conceptual maps. There was still more! And, for the most part, they represent actual units, and not scattered, individual, remnant "legacy" old growth/mature stems or the like, as they appeared to have been characterized in BLM's letter of 1/24/2020." Thus, this salient fact: i.e., the difference between individual dispersed old growth/mature "legacy" trees and the contiguous stands of such trees on 29-8-7, has been made by me repeatedly, and well before the advent of the 2016 RMP or the 42 Divide Proposal. Herein, it appears that I have had to argue its validity, yet again.

#### CHANGED CIRCUMSTANCES/NEW INFORMATION

The final paragraph of the letter (see included item #2) sent to me on behalf of Ms. Bickford, dated 1-24-2021, states: "The BLM will not be considering an RMP amendment to change the land use allocation of this parcel at this time. The BLM is scheduled to conduct plan evaluations on a 5-year schedule. At that time, the BLM will assess whether changed circumstances or new information have created a situation in which the expected impacts or environmental consequences of the plan are significantly different from those anticipated in the PRMP/FEIS (ROD/RMP, P. 34). Through the plan evaluation, the BLM will make a finding of whether or not a plan amendment or plan revision is warranted, consistent with 43 CFR 1610.4-9."

The basic sylvacultural condition, what ought to have been subsequent corrected cartological facts, and the appropriateness of subsequent management proposals on Twp. 29S, R8W, Sec.7, relevant to my petition for an amendment to the RMP, have not, to my knowledge, changed significantly since that petition was filed by me in January of 2017. (see included item #7, Cover Letter for Petition to Mr. Mark Brown, dated January 5, 2017) That is, except for the limited salvage logging that BLM permitted, over my oral and written objection (see included item #1, a letter sent by me to Ms. Kristen Thompson, dated October 11, 2019); this objection made, at least in part, in light of the fact of my still-pending plan amendment petition. In the event, that salvage went forward and while it is true that the several removed stems were less than 40" dbh, nevertheless, a ring count showed some to be well over the 200 year upper limit mentioned in the 42 Divide Scoping Notice. From this direct data, one is led to believe that in any future MITA Regeneration Extraction, such as tentatively indicated on Map #3, stems less than but approaching the 40" limit might well be in the 300 year old range, or more.

1) Importance of old growth/mature trees for carbon storage and carbon sequestration

Regarding the "...expected impacts or environmental consequences..." mentioned in the above excerpt of Ms. Bickford's letter to me of 1-24-2021, one need only look to the recently concluded COP 26 media reports and releases regarding primary forest preservation and its critical importance, vis a vis runaway climate change. After all, it requires no great effort on my part, nor, one might reasonably assume, on the part of dedicated, well educated and well informed public land managers, to realize the degree to which this planet, and this particular region of the planet, is already badly impacted by this onrushing, human-influenced phenomenon. To wit: extreme, perhaps unprecedented drought; increased severity of wildfire, record shattering high temperatures, massive floods in places unused to such events, increasing downward pressure upon biodiversity etc. etc. With the existential nature of the climate crisis in mind, a letter (See included item #8.), dated October 28, 2021, titled Conserve Older Forests in the United States to Fight Climate Change, and signed by some 132 interested organizations and noted individuals, many possessing outstanding scientific credentials, was sent to: the Honorable John Kerry, United States Special Presidential Envoy for Climate; the Honorable Gina McCarthy, White House National Climate Advisor; the Honorable Tom Vilsack, United States Secretary of Agriculture; and the Honorable Deb Haaland, United States Secretary of the Interior. Follows excerpts from that timely and important communication to members of the current Administration, including the head of the Interior Department: "Conserving our last remaining older (mature and old-growth) forests and trees on federal public lands in the United States is one of our country's most straightforward, impactful and most cost-effective climate solutions in addition to rapidly reducing greenhouse gas emissions across all sectors of the economy."

And: "Unfortunately, thus far the Forest Service and Bureau of Land Management have not produced credible proposals for combating climate change nationwide, or for conserving carbon-rich older forests and trees on the lands they manage." (emphasis, J.P.Q.)

And: "Older forests are important from a climate change mitigation perspective for at least two reasons. First, they store vast amounts of carbon accumulated over decades to centuries. Cutting those forests down emits the majority of that carbon back to the atmosphere. Second, older forests are sequestering vast amounts of carbon from the atmosphere— a critical tool as emissions reductions alone are an insufficient strategy for countering the worsening climate crisis.

The benefits of protecting older forests do not stop there. They are essential biodiversity reservoirs--the profound complexity of older forests sets the stage for the abundance of life found in these areas. And with a rapidly changing climate producing more droughts and greater storm events, older forests are well springs for clean water and flood control."

In her November 18, 2009 statement (see included item #9) before the United States Senate Subcommittee on Public Lands and Forests, Dr. Beverly Law, Professor of Global Change Forest Science at Oregon State University, said this: "To manage federal lands in the public interest of carbon sequestration, we should strive to preserve mature and old forests to avoid losses of carbon associated with harvest. Many of the mature and old forests are on public lands, so they are uniquely positioned to act as carbon reserves. For example, in the Pacific Northwest, biomass carbon is usually higher on public lands, primarily because of the younger forests on private lands (Hudiburg et al. 2009). Activities that can contribute to increasing carbon sequestration include: planting forests in areas previously harvested (reforestation), and on lands suitable for growing forests (afforestation). Such forests can be expected to accumulate carbon for many decades." (emphasis, J.P.Q.)

And: "The moist forests have evolved with very infrequent high severity disturbance regimes (e.g. wind, fire) where mosaics of stand replacement have occurred. Old-growth moist forests have had little human impact and management treatments are generally not needed to maintain them in the foreseeable future. The dry forests have evolved with more frequent low and mixed severity wildfire as the primary disturbance regime, and the structure and function of old forests has been altered by ingrowth of less drought and fire tolerant species. Historically, these forests had relatively low densities and with scattered older trees of highly drought- and fire-resistant species. (emphasis, J.P.Q.)

It is an almost universally acknowledged fact, and not simply my personal opinion, that the rapidly worsening cascade of enormously damaging, and glaringly obvious, impacts of anthropocentrically influenced climate change, are being seen and experienced around the globe, as well as here in western Oregon and Douglas County. Given that ominous, indeed very nearly terrifying context, for the BLM to cling to its position that any addition to the atmospheric carbon pool via release, by logging, of old growth/mature stands and the subsequent cessation of carbon sequestration that inevitably follows such extraction; to maintain that this damaging activity is only temporary, and that in 20, 30, or however many years following, things will balance out carbon-wise, is specious at best and highly irresponsible at worst.

Note well: This world, these United States, this western Oregon does not have decades to expend on such widely disproven management mistakes if there is to be much or, indeed, any hope of ameliorating what we humans have done, and are doing, to this planet, its natural systems and its flora and fauna, including ourselves. Echoing the dire sentiment recently expressed by the U.N. Secretary General in his powerful address to the COP 26 gathering, in Glasgow: should we ignore the climate crisis and continue on, as we have before, we will be digging our own graves and the graves of our children and theirs and theirs! To paraphrase what Christ Himself recommended: They who have ears, let them hear! To which I have the temerity to add: They who have eyes, let them see!

## 2) Greater resistance of older forests vs plantations to the severity of wildfires and the rapidity of wildfire spread

In their seminal 2018 paper: Severe fire weather and intensive forest management increase fire severity in a multi-ownership landscape, authors Harold S. J. Zald and Christopher J. Dunn[1] had the following to say under the "Management Implications" heading, on the final page of their study: "However, in the landscape we studied, intensive plantation forestry appears to have a greater impact on fire severity than decades of fire exclusion. Second, higher fire severity in plantations potentially flips the perceived risk and hazard in multi-owner landscapes, because higher severity fire on intensively managed private lands implies they are the greater source of risk than older forests on federal lands. These older forests likely now experience higher fire severity than historically due to decades of fire exclusion, yet in comparison to intensively managed plantations, the effects of decades of fire exclusion in older forests appear to be less important than increased severity in young intensively managed plantations on private industrial lands."

It is true that, although nearby, there are no private industrial plantations, such as those referenced in the above-study, directly bordering BLM's holding on 29-8-7. However, if BLM should opt to include, in any future MITA or other regen., the legacy old growth/mature stands that I have gone to such great pains to identify, and thereby protect, and which either have been deliberately or inadvertently omitted from agency maps (I prefer to think the latter.), most of 29-8-7 might well then be relatively heavily restocked, following. Allowing Zald and Dunn at least a modicum of deserved credibility, this restocking could very well pose a potentially significant increase in the risk of wildfire severity and rapidity of spread; an increased risk to myself and my family as well as to adjoining persons and private properties. As BLM has often maintained in previous NEPA documents, this increased threat might well persist for some decades.

Please recall: BLM is operating within the WUI, here in Camas Valley. Given the above discussed increasing hazards posed by climate change, relative to severe wild fire, my own and surrounding properties and homes should not be forced to live with a significantly raised level of wild fire risk, for whatever duration, imposed by short sighted extractive actions for short term benefits; ironically, such putative management actions undertaken by a public agency supposedly operating, at least in part, with the long term public good foremost in mind.

## 3) Potential adverse impacts to surface and ground water, quantity and quality

Such seminal studies as Perry-Jones[2] and Segura et al.[3] strongly suggest that logging older, primary forest

stands and replacing same with plantations can have detrimental impacts upon summer streamflow regimes. Imposing relatively large canopy openings, particularly of older primary stands by means of MITA or other excessive extractive proposals, on 29-8-7 (as elsewhere in the Coast Range) must, by reasonable inference, most likely have adverse impacts on intermittent streamflows, springs and ground water, thereon. My own well, those of neighbors, as well as streamflow in the beleaguered Middle Fork of the Coquille River, which passes through Section 7, should not be put at still more hydrologic peril. After all, as all can readily see, drought, even extreme drought with accompanying record high temperatures has already had adverse impacts on all of these hydrologic features. It would most certainly appear to be both unwise and irresponsible to put these critical resources at still further risk via regen of old growth/mature stands or other heavy handed extraction, given the obviously worsening symptoms of anthropocentrically influenced climate change. After all, anyone, who witnessed 2020's extreme drought and how it, and record high temperatures, imposed hardship on all water users, human and otherwise, will realize the importance of preserving, and helping to increase, the stock of old growth/mature stands on our public lands, not reducing that stock. (Judging by the rainfall figures, as measured at the Roseburg Airport, for the water year that began 10/01/2021, such extreme drought might well be part of the new, climate crisis normal.)

4)Increased downward pressure on imperiled species, ESA listed and otherwise, resulting from imposition of more large canopy openings, such as by MITA regeneration extraction on 29-8-7

As described in my ACEC Nomination of 2005 (see included item #9, within included folder #5, Documents for Protest, 29-8-7), numerous native fauna reside on or move through the stands on section 7. Indeed, as just one example, more than a few of the old growth trees in the stands I have identified here have branches wide and high enough for nesting by the greatly threatened Marbled Murrelet. It is important to note that the other older and mature stems around these suitable nesting trees serve to provide cover for these unique birds. To deprive our fellow creatures of still more habitat, given all of the vast amount of late seral and other habitat that has been "slicked off" by entities, public and private, during preceding decades; to engage in this kind of short-sighted management, driven, it often seems, by co-opted political and other pressures, ill becomes the BLM. Protect watersheds, regulate streamflows, provide for recreation: these stipulations were written into the very first paragraph of the 1937 O&C Act. To the best of my knowledge, they remain in that paragraph and deserved to be honored.

## RECOMMENDATIONS

Given the witches brew of threats posed by the obviously accelerating Climate Crisis, if extractive management is deemed necessary, I have the temerity to suggest the use of Variable Retention Thinning (VRT) on the already clear cut portions of 29-8-7. Considering the potential, discussed above, for increased wildfire risk, adverse impacts to surface and ground water, downward pressures on biodiversity etc., and, of course, the total release of additional CO<sub>2</sub> into the already swollen atmospheric carbon pool, such a management model would very likely be considerably more adaptive, vis a vis climate change and its several dire implications, than reimposing the kind of large canopy opening onto 29-8-7 represented by MITA regen. The VRT model is endorsed by such silvicultural luminaries as Thomas Spies, Jerry Franklin, Norm Johnson et al. in their seminal study, focused on this very issue:

"Use variable density thinning in dense young stands to provide more resources to surviving individuals and promote resilience and species and structural diversity.

Spatially heterogeneous thinning of dense young stands has promoted the growth and survivorship of remaining individual trees and, more recently, been used to accelerate the development of structurally and ecologically diverse conditions (Thomas et al. 1999). Such thinning could, in theory, also promote growth and vigor of the tree layer under warming climate, but no studies have examined this question. However, the duration of this effect and the degree to which it promotes undesirable understory growth is a major uncertainty. In addition, thinning

and associated management activities can increase occurrence of invasive plants." [4]

As regards the stands of primary old growth/mature I have identified in this and past submissions to the BLM, the following is what that same study had, in part, to say:

"Maintain existing older forest

Large conifers are more resistant to drought and have lower mortality rates than smaller individuals (Phillips et al. 2003), and may be found in moist parts of the landscape that may be buffered against the effects of climate change. This resistance may result from deeper roots and greater water holding capacity than younger trees. Although mortality rates in old-growth forests have increased over the last few decades (van Mantgem et al. 2009), the very existence of centuries-old trees demonstrates that they can persist in the face of some level of climate variability." [5]

This same Spies, Johnson, Franklin et al. paper observes the following regarding the likelihood of significant disruptions to natural systems, due to Climate Change, and the need for adaptive planning to meet these challenges:

"Large changes in the climate of the PNW are highly likely to occur but the effects will vary significantly across this topographically diverse region. Many of the policies and practices that were established to conserve biodiversity under the assumption of a stable climate appear to provide a good starting place for conserving biodiversity under a changing climate. However, undesirable and unanticipated changes will occur, but these may be tempered by planned adaptive actions. These actions include changes in stand and landscape management practices as well as in approaches to planning. The strong and spatially prescriptive laws and policies that are now in place do provide some flexibility for taking adaptive actions." [1] (emphasis, J.P.Q.)

## CONCLUSION

Given the experience of decades, restoration of mature and late seral stands on the vast private industrial acres of western Oregon is highly unlikely to occur any time soon. And, as BLM well knows: it is virtually pointless to discuss conservation of older stands on these vast private industrial timberlands, if, indeed, many (or any) such primary stands were still to be found, thereon; primary stands, that is, which have not been clear cut long since, victim, as it were, of the insatiable appetite of the Financial Forestry/Sustained Yield management model, as practiced on the lands of these large Real Estate Investment Trusts and Timber Investment Management Organizations etc. On the one hand, the remaining, if reduced amount, of old growth/mature stands on BLM and other public forestlands store and continually sequester huge amounts of atmospheric carbon. On the other, the limited volume of carbon stored and subsequently released by short rotation clear cut logging of well sprayed monoculture plantations does little if anything to ameliorate the present climate crisis. Rather, it worsens it at the same time that it worsens the already degraded state of too many natural systems.

Thus, like it or not, on the Oregon Coast Range and the west slope of the Cascade Range, the old growth/mature on our public forestlands is, in effect, the only show in town! Although greatly diminished in extent across western Oregon, the older primary forest that still stands, continually growing, on public lands, including on 29-8-7, storing past emitted carbon, and that continues to sequester ongoing carbon emissions, is virtually all that remains. For the BLM (or the USFS, for that matter) to persist in proposals to log any of these remnant stands must signal the agency's de facto disinterest in ameliorating the increasingly damaging impacts of our rapidly and palpably worsening climate crisis; either, that is, the BLM's disinterest in amelioration, or its denial, de facto or deliberate, of the climate crisis and its anthropocentrally influenced sources and solutions.

More than 150 years ago, our nation was enmeshed in 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 various climate related challenges 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, while, in the same breath, ordering the liquidation of older stands, such as those I have identified and striven to protect on Twp 29S, R 8W, Sec 7. Repeating over and again, as it were: Oh, this little bit more is only a drop in the worldwide atmospheric carbon pool. Its impacts are negligible, and will not make much, or any, detectable difference. Any precocious child might rightly answer such a less than useless notion by replying that the world's atmospheric carbon pool itself is composed of countless individual molecules, each contributing its share, however minute, to the whole. These impacts are cumulative for, after all, 1+1 still equals 2 by most reckonings . In these increasingly perilous times the BLM "...must think anew, and act anew." In the end, we, all of us "... must disenthrall ourselves..." so that our world and its living creatures, including we human beings, may be saved and continue to thrive!

Sincerely,

ATTACHMENT: Wherein We Audit the Forest.pdf

#### FOOTNOTES:

[1] Note the following, appearing under the Acknowledgments heading of the Zald and Dunn research paper: "Funding for this research was in part provided by the USDI Bureau of Land Management (Cooperative Agreement no. L11AC20137/L01540). We thank Krissan Kosel at the USDI BLM Roseburg District for assistance providing Calvert Station RAWs weather data, as well as thoughtful review and discussions of prior versions of this manuscript." (emphasis J.P.Q.)

[2] Perry, T.D. and J.A. Jones. 2017. Summer streamflow deficits from regenerating forest in the Pacific Northwest, USA. *Ecohydrology*, 10(2), e1790.

[3] Segura et al.: Long term effects of forest harvesting on summer low flow deficits in the Coast Range of Oregon

[4] Climate change adaptation strategies for federal forests of the Pacific Northwest, USA: ecological, policy, and socio-economic perspectives; Thomas A. Spies [bull] Thomas W. Giesen [bull] Frederick J. Swanson [bull] Jerry F. Franklin Denise Lach [bull] K. Norman Johnson, 2010, Page 8

[5] Climate change adaptation strategies for federal forests of the Pacific Northwest, USA: ecological, policy, and socio-economic perspectives; Thomas A. Spies [bull] Thomas W. Giesen [bull] Frederick J. Swanson [bull] Jerry F. Franklin Denise Lach [bull] K. Norman Johnson, 2010, Page 8

[6] Ibid. Page 13