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December 31, 2007

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State Director - BLM
PO Box 2965
Portland, OR 97208

RE: Revision of Resource Management Plan (RMP) for West Oregon
Western Oregon Plan Revision (WOPR) DEIS Comments

Dear Sir:

I am taking this opportunity to urge you to select the No Action Alternative for the DEIS. I do make this recommendation lightly. BLM has a history of mismanagement of O&C Lands in the recent past including unwise clearcutting, unwise and ineffective replanting, and allowing harvested lands to become dense with thickets of small trees susceptible to fire, disease, and wasting the land base on which they site. Because of this history of mismanagement, the economic and environmental health of Oregon's communities has suffered.

The current management of the BLM O&C Lands in conformance with the 1994 Northwest Forest Plan has probably saved western BLM Oregon forests from irreparable harm. BLM has failed miserably in sustainable harvesting, instead running the forests into the ground-just look at the Suilaw-you should be very very ashamed.

Stated Basis of WOPR - The stated basis of the current plan revision is to meet 1937 O&C law for sustainable yield. You indicate a lawsuit settlement agreement legally requires BLM to increase harvesting. That is in fact in error; the agreement states the BLM revise its resource plan to 1) consider at least one alternate that limits reserves needed to comply with the endangered Species Act, and 2) all alternatives comply with the O&C Lands Act. Nothing requires the BLM to return to higher levels of harvest that further jeopardize endangered species such as the spotted owl and marbled murrelet, and water quality. Furthermore it does not require BLM to move away from 1994 Northwest Forest Plan management over BLM lands.

BLM was required to provide one alternative that reduces reserves (LSRs), instead all of BLM's alternatives do. LSR as a percentage of land base for No action is 36% and LSR percentages in Alternates 1, 2, and 3 are 28%, 9%, and 0% respectively. In addition, riparian reserves as percentage of land base for No action is 14% and riparian reserves percentages in Alternates 1, 2, and 3 are 9%, 6%, and 7% respectively. Taken cumulatively, it appears that BLM does not have an adequate harvestable land base (matrix) without taking both endangered species and reducing water quality and meeting projected plan harvests (275,000, 450,000, 727,000, and 480,000 board foot annually for No Action and Alternates 1, 2, and 3 respectively).

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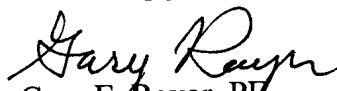
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I also believe that BLM's analysis of what land is needed for recovery of endangered species is flawed and must be revisited. I have been carefully following the developing scandal of a Bush Administration official, former Deputy Assistant Interior Secretary Julie MacDonald, who falsified the results of environmental studies leading to flaws in changing listing and ongoing recovery criteria. Unless BLM can certify it is in compliance with current law that has or in the process of being overturned, BLM must postpone the DEIS process, and rewrite necessary portions for a new legal DEIS.

I additionally support No-action 1 because all alternates result in loss of habitat for both spotted owl and marbled murrelet by 2016. Unfortunately, loss of habitat for an endangered species is more than numbers; it may mean the difference between recovery and extinction. Currently there are 458,000/373,000 acres of available habitat for the spotted owl/marbled murrelet in the land base. In 2016, the DEIS estimates that under No-action and Alternates 1, 2, and 3 these become are 490,000/unreported, 485,000/unreported, 300,000/ unreported, unreported/unreported respectively. Where unreported is shown, BLM give the acreage capable for supporting the subject species and not the actual available habitat (apples and oranges comparison). What this tends to say is BLM does not know how much actual viable habitat it has for endangered species, but general knows that all alternatives decrease habitat through 2016. How BLM calculates any of the alternatives will contributes to recovery is speculation, arbitrary, and capricious.

BLM takes other poorly justified positions in evaluation of alternates including harvesting by clearcut (not considering green tree canopy retention similar to current USFS practice), harvesting old growth trees and stands, and not performing thinning to improve forest health. In addition, BLM as a major producer of timber does not address sustainability, marketing its products as green (because they historical are not), global warming, climate change, EU ISO 9000, 90001, and 14000 sustainability practices, and similar non-standardized concepts in North America.

In summary, BLM is ill-advised to pursue this RMP. As a resource agency, BLM reveals several things with this RMP: we are here to lose money, we are here to deliver the public very little, we are here to sell the future generations legacy, we are here to give timber away in a non-environmentally sensitive way, and we are here to obfuscate the real issues to a caring public.


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