

**Richard Spotts**

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**From:** "Richard Spotts" <spotts@infowest.com>  
**To:** <orwopr@or.blm.gov>  
**Sent:** Saturday, January 05, 2008 3:01 PM  
**Subject:** My WOPR comments

January 5, 2008

Bureau of Land Management

Western Oregon Plan Revisions Office  
333 SW 1st. Avenue

Portland, OR 97208

**RE: My comments on BLM Western Oregon Plan Revisions**

Dear BLM officials:

Please accept this letter with my comments on the above-referenced matter.

I strongly oppose BLM's proposed management of nearly 2.6 million acres of federal forests under the Western Oregon Plan Revisions. The changes that the BLM is contemplating will unravel the protections of the landmark Northwest Forest Plan, and may lead to water pollution, degraded habitat, and increased conflict and controversy.

Your current proposal is unacceptable. The agency proposes to increase old-growth logging on public lands in western Oregon by 700%, build 1,000 miles of new logging roads in the next decade and clearcut at a 9-1 ratio to thinning. This is a myopic and backwards proposal that depletes our natural resource base for future generations by weakening protections for forests, creeks and salmon. Shockingly, the proposal ignores the role that these forests play in regulating the climate.

Most Americans want federal land managers to embrace thinning second growth forests, safeguard communities from wildfire and protect what remains of our nation's ancient forests. By focusing on previously logged public forestlands - many of which are now overgrown and in need of thinning - they are providing wood to local mills while actually improving conditions for fish and wildlife and keeping saws out of precious old-growth forests.

In contrast, the WOPR proposes to inflame the controversy by increasing old-growth clear-cutting for a short-term economic fix. The WOPR puts water quality at-risk and would destroy some of Oregon's most special places. We should protect our remaining mature and old-growth forests on public land, not clear-cut these natural treasures as the WOPR proposes to do.

It is disappointing that at a time when public consensus for old-growth protection and second-growth thinning has never been stronger, the BLM is proposing to clear-cut forests older than our nation and turn complex ecosystems into flammable tree farms.

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While BLM claims that the O&C Lands law requires old-growth logging, and therefore limits its management discretion, I believe that this legal interpretation is suspect and self-serving for the Bush Administration that is pushing the timber industry's agenda. The federal Endangered Species Act was passed after the O&C Lands law, as were a number of other modern environmental laws. Under standard conflicts of law court decisions, more recent legal requirements can supersede or at least modify older legal requirements. BLM apparently does not want to acknowledge an arguably more progressive or ecologically enlightened legal position vis-a-vis WOPR because this would undercut its ability to give the timber industry what it wants. This approach is myopic and contrary to the national public interest.

For the preceding reasons, please abandon the current proposal. In its place, please develop a proposal that will protect remaining old-growth forests, focus active management of BLM lands in already logged-over areas, and concentrate job opportunities in restoration forestry that would benefit watersheds and generate wood products without multiplying past mistakes.

Although I am not an Oregon resident, I am a frequent visitor. I enjoy hiking and wildlife watching on BLM lands in Oregon. Since these BLM lands are owned by all Americans, and my taxes help support BLM management programs, I believe that I am a "stakeholder" to provide WOPR comments.

Thank you very much for considering my comments.

Sincerely,



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