

Bureau of Land Management
Western Oregon Plan Revisions
P.O. Box 2965
Portland, OR 97208

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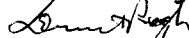
Dear Ladies and Gentlemen:

In the previous round ("scoping") of public comment on the Western Oregon Plan Revisions, I believe I understood that a large majority of the comments expressed a desire that the Bureau of Land Management deemphasize regeneration harvests (essentially clear cuts, though you don't call it that anymore) and concentrate more on thinning, recreation and tourism, and other less harsh and less extractive practices. Since my own thoughts and comments were similar, I was pleased to learn this. Yet, in your draft Environmental Impact Statement, all the alternatives, especially the preferred alternative (#2), (except of course "no action"), drastically increase timber production and regeneration harvests. For you to ignore public opinion in this way is not against the rules, but it shows an arrogance unbecoming in public servants.

The O&C Act requires you to manage the O&C lands for sustained yield. I am sure that I have understood BLM employees to say that this means such a level of harvest that you can expect to harvest as much or more each year, indefinitely. Or, to put it another way, that you take only the "interest" that the forest produces, and do not dig into the "natural capital". I am perfectly willing that you manage the forests at this rate. Thinning a forest can readily be adjusted to do this. But regeneration harvests take virtually all of the natural capital in a small area. Even some clear cuts can be tolerated, provided that you leave other portions of the forest untouched. I do not believe that alternatives #1, 2, and 3 do this to a sufficient degree. Furthermore, in the 1980's, the BLM harvested Oregon forests at a very high rate. You were cutting deeply into the natural capital, and in the 1990's you were compelled to reduce harvests. Alternative #2, and perhaps alternatives #1 and #3, returns harvests to approximately (or perhaps more than) 1980's levels. Such rates could not be sustained then; they cannot be sustained now. (Table 26, p. 71, and Table 32, p. 82. Also Fig. 4, p. LV, though the graph and the tables do not seem to agree.) To comply with the O&C Act, you cannot choose Alternative #2, and probably not #1 or #3, either. Your only legal option within the revision process as it stands is to choose the no action alternative.

This means that all your work on the consequences of alternatives #1-3 was a waste of your time and effort. Nor is the no action alternative really satisfactory either, from anyone's point of view. A better choice would be to start fresh. Scrap the revisions process and its product to date. Come up with some real alternatives which are consistent with the O&C Act and the EPA. I know for sure that some have been suggested. Pay attention to public opinion this time around. Solicit advice from the Forest Service, which I believe is doing a good job managing its forests. This will surely delay the process, but if you do this, you will have the public supporting you instead of against you.

Sincerely yours,


Lennart Pugh
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