

4910 Crowson Ave
Baltimore, MD 21212
January 11, 2008

Bureau of Land Management
Western Oregon Plan Revisions Office
333 SW 1st Avenue
Portland, OR 97208

I am writing in opposition to the new WOPR plan revisions, as outlined in the Draft Environmental Impact Statement, on the basis of two positions:

1. As the representative of my wife, who owns a residence in Medford, OR, where we expect to move within two years, I am dissatisfied with the devastating environmental destruction which the draft EIS seeks to justify with pseudo-scientific data.
2. As a subject matter expert with considerable experience in writing the environmental noise sections of draft EIS documents, I find your discussion of noise impact, particularly the impact from Off Highway Vehicles (OHV), to be completely inadequate!

First, let me speak to the adverse impact of your proposal on my wife and myself as future residents of Medford. I have hiked in the area where the BLM draft EIS proposes to allow clear cutting. It is beautiful and pristine, and one of the reasons why my wife and I are preparing to take up stakes and move to Oregon. By logging near streams, the WOPR reduces important protections for clear water and Pacific salmon. I have read that BLM lands in western Oregon contain about 1 million acres of our remaining older forests. The WOPR would increase logging of forests over 200 years sevenfold, and threatens some of Oregon's best remaining ancient forests. I have read that 2,000 square miles of forest (an area the size of our neighboring State of Delaware) would be put in "Timber Management Areas," where clear cutting is encouraged. Wildlife depends on BLM forests such as elk and black bear and threatened species like the northern spotted owl and the marbled murrelet. The WOPR would reduce protections for wildlife populations and diminish habitat for countless plant and wildlife species. An increase in noxious and invasive weeds is predicted under WOPR. In a world where every tree is needed to sequester the carbon dioxide which is raising the sea level in places as close to our current home as the Chesapeake Bay, I find it morally reprehensible that any responsible citizen would endorse such wide scale destruction of forest!

Second, let me speak as a subject matter expert in drafting noise sections for EIS documents. My very first project concerning noise on BLM land was in 1975. The work was done to support the Army's proposal to renew their agreement on the withdrawal of BLM lands in New Mexico for use by Fort Bliss. At that time, I was a CPT, US Army

Medical Service Corps. Even though our equipment would be considered primitive by today's technical standards, we carried out extensive measurements of the ambient background noise to include an analysis of the effects of helicopter noise on the pronghorn antelope. [The work on the prong horn antelope was published in the Journal of the Acoustical Society of America.] During the subsequent years when I served as the Program Manager for Environmental Noise at the Army Environmental Hygiene Agency (retiring in 2003), I touched base with BLM on a number of projects. I was always disappointed, because the technical competence of BLM officials in regards to the preservation of natural quiet lagged far behind those of your sister agencies, the Forest Service and the National Park Service. In regards to the current draft EIS, there is not even a separate Appendix on noise and the preservation of natural quiet. Vast amounts of research conducted by experts (such as those at Penn State University, the Army Construction Engineering Research Laboratory and the Army Corps of Engineers Cold Regions Engineering Research Laboratory) on the propagation of noise through forests has not been adequately integrated into the analysis.

As an expert, I would be pleased to discuss these shortcomings with the writers of the draft EIS on a pro bono basis. I can be reached at 410-433-3547 or by email:

Luz_Associates@msn.com

Sincerely,

George A. Luz, Ph.D.

Cc: Senator Barbara Mikulsi
Senator Benjamin Cardin
Representative Sarbanes