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Bureau of Land management
Western Oregon Plan Revisions Office
P.O. Box 2965
Portland, Oregon 97208

RECEIVED

JAN 11 2008

Re: WOPR

Dear Folks at BLM,

It strikes me that logging is quite similar to commercial construction, particular the excavation phase. My experience as a professional engineer and designer is that more and municipalities and counties are requiring ever more involved methods of erosion control during construction, particularly on sloped building sites. These imposed controls are often costly and sometimes quite extensive, and were not imposed lightly, without extensive study and deliberation. As I'm sure you know, disruption of the natural landscape can create very significant erosion and result in pronounced degradation of surrounding water ways. I'm sure you are well aware of the impacts of logging and are well versed regarding the current BLM rules and regulations aimed at limiting the detrimental effects on rivers and watersheds from erosion associated with logging.

When I researched on-line, the requirements for erosion control on BLM (and USFS) lands compared to requirements for construction on similar slopes within our city limits, I was amazed at the difference. My view is that we have a long ways to go in adequately protecting our waterways once we are outside city limits. I am very concerned for our coast range watersheds if the proposed plan revision goes forward with the current erosion regulations, particularly in light of the magnitude of effected acreage. If anything, I believe logging activities should be curtailed until more extensive erosion-controls are required and enforced.

Water quality is my primary concern. Public safety is a secondary concern. Given the number of occurrences of landslides and mudslides that have occurred in recently logged areas of Western Oregon this fall and winter, I think we need to put the brakes on any proposal that seeks to increase the number of acres of destabilized slopes in our state.

Thanks you for the opportunity to comment.



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