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Bureau of Land Management
Western Oregon Plan Revision Office
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RE: Comments on the Draft Western Oregon Plan Revision (WOPR)

Please accept the following as my official response to the WOPR, which are timely. I incorporate in full the comments submitted by the Oregon Chapter of the Sierra Club, the Natural Trails and Waters Coalition, the Klamath Siskiyou Wildlands Center, The Siskiyou Regional Education Project and the Deer Creek Valley Natural Resources Conservation Association.

The BLM has, on a number of occasions, cited violations of the O&C act as a primary motivation for WOPR. The claimed basis is that underproduction was evidence of the violation of O&C directives pertaining to the nature and size of timber production. Apparently BLM has been aware of the number of cases it has lost in court and is attempting to prevent further losses by changing the rules and law.

I am struck by a comment reportedly made in September of 2007 on a NPR talk show. Medford District BLM director Tim Reuwsaat was asked why BLM is driven to log old growth trees and responded by saying that if thinning were the only allowed logging activity, the district would be out of marketable timber in three years. To me, that statement is testimony to BLM's inability to log sustainably, a key element of the O&C act. It prompts these questions:

1. Is BLM claiming its unsustainable logging practices are unimportant in the O&C act and is free to change rules in order to log at will? Doesn't BLM's record of continuing losses at court settle as litigated that sustainability is the pre-eminent O&C requirement? And doesn't that record negate BLM's claim that it must log more to cease violating the O&C act?
2. Since past BLM practices clearly were not those of forest-sustainable logging, doesn't the WOPR become a strategy to allow the same irresponsible practices in old growth?
3. Does BLM have any sense of responsibility towards the future economic, aesthetic, developmental and security issues faced in the Illinois Valley?

Over years of debate with BLM, I have concluded the agency's preferred forest is a tree farm. Trees would be spaced for convenience of mechanical harvesters, paper mills and

similar commercial/corporate activities. There would be no consideration of species; habitat needs, alternative forest products, birding and hiking in an intact forest or real estate values driven by those opportunities.

How is it possible that a government agency can so enthusiastically participate in accelerating global climate change? There is no question as to the importance of forests in protecting the planet. BLM conducts unconscionable manipulations of law and rules to advance global climate change and produce high-value old growth lumber for a collapsed housing market. The only possible explanations for these suicidal behaviors are to fulfill political promises and advance the wealth of a few at the expense – actually lives – of the many. BLM projects re-growth sufficient in 60-100 years to reestablish species populations WOPR would decimate. But scientists project climate change impacts to human populations and plant/animal species before BLM's projected recovery. I am being urged to use only efficient lighting while BLM rapes hundreds of thousands of planet-protecting acres!

How is it possible that a government agency could advance riparian destruction knowing the history for fish stocks that destruction has already engendered? WOPR riparian destruction promises reduction in fish population and all that means for the fishing industry and the health of the ocean.

How is it possible that a government agency could so willfully invite OHV vehicular traffic into critical and sensitive sites? Dunes have been protected from even hiking intrusion for years to help nesting birds, yet BLM doesn't see the same necessity for forests? The very smallest outcome of this action is the increased burning of fossil fuels; The greatest is the hypocrisy of "intensive management" claiming to help forests when timber and satisfying ORV manufacturers' lobbying successes are the driving forces. There are no BLM-developed criteria to guide OHV site selection. The process is therefore open to either political choices or making choices to advance logging desires.

Past BLM studies on soils and cumulative impacts have been self-serving at best and criminal at worst. Surveys used are old and not site-specific. Cases that BLM loses are often lost because BLM did not conduct the surveys it says it did or it chose to ignore the requirement. WOPR is no different.

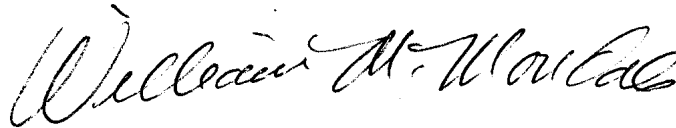
The scale of the WOPR makes substantive comments an overwhelming task to most of us. I am well aware of expert and comprehensive discussions and insights on WOPR written by environmental scientists and legal experts. I rely on them for the substance I am incompetent to provide.

There is nothing new or different about WOPR from concerns I have expressed in the past on other projects. WOPR's scale, however, is radically different as will be the impacts on most aspects of our forest-dependent lives. The tragedy is that BLM readers of public comments will dismiss comments like mine as non-substantive. These comments address the most substantive issues any of us could possibly consider. I have

known several BLM employees who understand how unacceptable to social, economic and environmental imperatives the WOPR is. Is there nothing you can do? Did you go this far in BLM employment to end up so helpless?

Even the "No Action" alternative is not what it says it is. I therefore oppose the WOPR in all respects and see no patchwork relief. Please end this assault on our homes, our water, our real estate and our beauty.

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A handwritten signature in cursive script that reads "William M. Mondale". The signature is written in dark ink and is positioned to the right of the typed name and address.

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