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BLM C/O MEDFORD OFFICE

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RECEIVED

JAN 11 2008

December 10, 2007

Bureau of Land Management
ATTN: WOPR Public Comments
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I write to express my strongest opposition to the BLM's proposed "Western Oregon Plan Revision," in the preferred "Alternative 2" that the BLM has put forward to excuse itself from ecological responsibility. ***The plan articulated by the BLM is an absolute repeal of the entirety of the past 2 decades of improvement, enlightenment, and scientific and social progress*** in forest management in the Pacific Northwest.

The sheer metrics of the plan are completely inappropriate in the contemporary southern and western Oregon that is increasingly urbanized, fragmented in landscape, and dependent upon its public lands as a last refuge for an array of plants and animals. To clearcut 140,000 acres and build 1,000 miles of new logging roads, in this region already crippled by similar forest exploitation in the past, represents a rejection of science, reason, and rationality in weighing of priorities. Shrinking streamside buffers down to an ecologically irrelevant 25 feet, as the BLM proposes in some watersheds, converting much of what remains of Oregon's ancient forests into 80-100 year rotation clearcuts, and deeply fragmenting Oregon's remaining roadless forests through ***these new roads would inflict crippling devastation on countless plant and animal populations, and seal the fate of an irreplaceable ecosystem.***

The ancient forests in which the BLM wants to increase logging are treasures at a global scale, and ***the moral imperative for their preservation vastly outweighs the BLM's petty and disingenuous claim that it is not meeting timber delivery commitments.*** This underlying premise, which the BLM has repeatedly presented in public, underlines a striking and contrasting hypocrisy - why is the BLM attaching hard, quantitative commitments to its timber targets, even as economic trends make them increasingly irrelevant, while seeking to jettison every last quantitative measurement of ecological sustainability? Why does the BLM want to discard the counts of red tree voles and northern spotted owls that act as critical indicators of the viability of Oregon's ancient forests? ***There is nothing in the BLM's charter that justifies such a disparity in the measurement of weighting of different outputs in the BLM's multiple-use system.*** Very little of Oregon's old-growth forests remain, and the BLM's proposal to cut deeply into what remains represents a complete failure of the BLM to implement its multiple-use mandate.

Just as Oregon is beginning to move beyond the "timber wars" by developing new methods of small-diameter timber harvest, genuine forest health restoration, and economic diversification in rural communities, the BLM is proposing to re-ignite these incredibly destructive battles, and initiate a new spiral of ecological decline and economic dependency. The horrifically ironic wastefulness of the

BLM's proposal is underlined by *the extremely low price for lumber in the current market*. Mills are shutting down and the US is engaged in a trade war with Canada due to global oversupply. Quite simply, the BLM is proposing to liquidate a resource that is precious and rare, and increasingly so, for a resource that the market is not asking for. This is the exact opposite of the approach that would resemble that of maximizing the total net benefits to America and the world. ***The BLM should produce more of those resources of higher value, and few of those resources of lesser value, not the reverse.***

The timber levels that the BLM is offering, and which it admits will contain a large portion of old-growth timber, is clearly unsustainable and therefore ***represents a false and dishonest offer to counties looking to replace federal timber payments from equally false and unsustainable harvest levels in the past.*** By presenting such a mathematically impossible volume of timber, the BLM is distorting the public policy discussion around public funding for county budgets. In essence, the BLM is trying to pretend that the Northwest Forest Plan, and the subsequent efforts by an array of public and private institutions to move toward a more stable and sustainable Oregon economy, never happened.

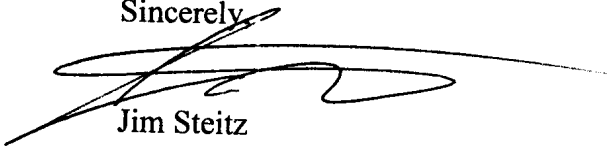
Therefore, the BLM's Alternative 2 represents the antithesis of responsiveness; it instead represents complete willful ignorance and defiance of reality. It pretends that timber is still a highly valued commodity with a substantial claim on Oregon's employment. It pretends that none of the advances in the science of forest ecology of the past 20 years ever happened. It pretends that Oregon still has a great reserve of unroaded ancient forests, and therefore plenty of extra forests to cut without consequence. ***Most of all, it pretends that the BLM can, at its own discretion, re-interpret its own legal charter by looking to the O & C Act to accomplish logging that has been barred by the courts*** under numerous environmental laws passed and enforced against the BLM since then. The BLM compounds this dishonesty with a blatant misrepresentation of effects of the proposed plan on fire risk, a popular hook for the BLM to hang its hat upon lately for logging projects. ***The BLM's own analysis concludes that Alternative 2's logging actions would make Oregon's forests, on the whole, more prone to catastrophic wildfire, not less,*** thereby conflicting with the BLM's own stated objectives. Again, the BLM seems to think that it can alter scientific and mathematical reality by pretending the contrary.

It is also deeply sad that the BLM would choose to waste public money and staff time preparing a plan that is in blatant violation of numerous laws, including the Endangered Species Act. The BLM has spent the better part of the past decade being repeatedly rejected in court for its efforts to avoid ecologically responsible management at the individual project level, and it is impossible that an official, region-wide campaign of ecologically irresponsible management would fare any better. As you know, the entire WOPR process emerged from a legal settlement with the timber industry in 2003, on a case that had already been dismissed in the government's favor, and which the timber industry had little chance of winning. ***The BLM cannot legalize its violation of the ESA and other laws, by hanging its hat on a friendly settlement of a meritless lawsuit, and the courts will say so*** if the BLM persists in trying to implement the WOPR.

Tragically, the BLM could be choosing a better path, and is ignoring it. BLM lands in the WOPR are riddled with second-growth forests that are already fragmented and degraded by past logging. ***The BLM could direct its resources toward ecologically sustainable and socially constructive consensus projects that restore these forests while supplying an honest, consistent, and abundant supply of small-diameter timber.*** The Forest Service has already made progress in taking these steps toward a forest management that is more appropriate to an urbanized and heavily impacted Oregon, and it is disappointing to see the BLM remain insistent on holding back reality by keeping its head in the sand.

I urge you in the strongest possible terms to withdraw the WOPR process in its entirety, or to design a new alternative that makes use of the current knowledge of forest science, as well as the BLM's legal obligations, to restore our degraded forests and create a sustainable future for Oregon's ecological, economic, and human systems.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Steitz", with a long horizontal flourish extending to the right.

Jim Steitz