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**Comments on the Draft Environmental Impact Statement of the  
Western Oregon Plan Revisions (WOPR)**

Prepared by: Arthur Farley, 1667 Fairmount Blvd. Eugene, OR 97403

*1. The premise that the timber harvest levels for Western Oregon need to be increased beyond existing Northwest Forest Plan levels is not supportable.*

You argue for the increase due to the wording in the O&C Act:

“ . . . for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the principal of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities . . .(43 U.S.C. §1181a)”

Sustained yield is a term that has a variety of meanings with the associated timber extraction levels depending on what values of the forest you are intending to protect and provide and to what level. The proposed plan revisions would greatly reduce watershed protection and stream flow regulation. We have nearly a century of records indicating the increased flooding, landslide, and siltation problems associated with clear-cut logging in the Pacific Northwest. Thus, the proposed revisions are not consistent with the O&C Act, as it calls for adequate provision of stream protection, as well. In addition, the Endangered Species Act adds habitat protection and recovery of threatened species to those aspects of the forest ecosystem that must be considered and provided, thus modifying the O&C Act and the meaning of sustained yield. External, independent reviews by biologists indicate the proposed revisions fail to provide for adequate endangered species protection and recovery.

*2. The problem is BLM management, not the Northwest Forest Plan.*

The BLM states on its WOPR web-page,

“After 10 years of plan implementation, timber harvest levels have not been meeting the levels directed by the existing plans. Through those years, BLM has gained experience and more accurate information upon which to base future actions.”

The BLM has had to adjust its management practices in response to the Northwest Forest Plan, which was an agreed upon result of successful legal actions against the BLM and Forest Service. It has taken the BLM time to gather the information it needs to plan timber sales under the new constraints. Now that information has been gathered, and timber sales should proceed under the existing plan based on that information. There were no required timber levels, only stated targets, under the Northwest Forest Plan.

3. *There are legal agreements on both sides of the issue that preclude change.*

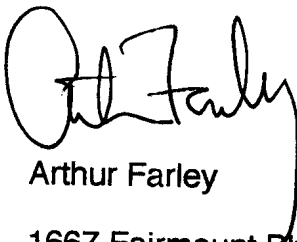
Much is made by the agency of the need to propose this plan revision as a result of legal challenges to BLM management practices from the timber industry. However, these legal agreements do not directly mandate increased timber harvest, though one element does require analysis on at least one alternative that tries to ignore all aspects of forest management other than endangered species. Unfortunately, independent reviews by biologists indicate the proposed revisions fail to provide for adequate endangered species protection and recovery, as stated above.

What is most important to remember is that the Northwest Forest Plan is itself a compromise agreement stemming from legal action by the environmental community that established inadequate management of the public forests by the BLM. Any move to abandon that compromise plan will serve to violate that legal agreement. The survival status of the northern spotted owl has further degenerated in the last 10 years. Lawsuits to reinstate that prior compromise agreement will have to demand even further restriction on any forest actions aimed at resource extraction, not fewer restrictions. The Northwest Forest Plan has provided a delicate balance for these past ten or so years. Adopting the preferred alternative (or any action alternative) of the WOPR would upset that balance and will never be implemented, as it would only lead to prolonged legal action and eventually even greater reduction in the agency's ability to realize what it sees as balanced forest management.

The only feasible alternative is the **No Action Alternative**, to continue management under the Northwest Forest Plan and increase both resource productivity and habitat protection as is best possible given the new information gleaned as results of the resource evaluations and environmental planning done to complete the WOPR.

Thank you for this opportunity to comment on your proposed action.

Sincerely,

A handwritten signature in black ink, appearing to read "Arthur Farley". The signature is written in a cursive, somewhat stylized font. The first letter "A" is large and loops around the first few letters of the name. The signature is positioned above the printed name and address.

Arthur Farley

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