

**Public Comment to the Environmental Assessment For Pilot Joe Demonstration Project
DOI-BLM-OR-M060-2011-0016-EA
U.S. Department of the Interior Bureau of Land Management, Medford District, Ashland Resource Area**

"All of the tools are at our disposal. All of the key players are at the table. All of the factors are right. Now it's time for us to get to work and find a way to provide timber for harvest and habitat for the conservation of Federally listed species."

--BLM Director Bob Abbey at the Dialogue on BLM Western Oregon Forest Issues, December 8th 2010

Addressing the concept of the Secretarial Forestry Pilot Projects

Characteristically BLM has taken great effort to avoid considering and documenting Impacts to those who are not "...all the Key players". Yet, there is an important Stakeholder group that this agency consistently fails to represent in their approach to forest management in western Oregon. This Stakeholder group is, in fact, the group most likely to be impacted by any landscape-level practices employed by BLM. I speak as one of them: the rural residents of the State of Oregon, Americans living in every other square mile of O&C lands and on the valley floors surrounded by BLM-managed lands.

O&C Act is superceded by the Homestead Act and others that the US. Federal Government created to encourage settlement by American citizens. The western Oregon lands occupied at that time remain occupied today, but the occupants have become a unrepresented constituency with State and Federal congressmen, their majority numbers and relative economic value trumped by industrial interests of short-tem prospect and minor economic value. I maintain that my rights as an American citizen to own and occupy this land without being physically and economically threatened by agency employees who serve not the citizens of Oregon, but answer to industrial minorities. This statement is verifiable truth to every stakeholder not in government or timber industry employ.

Also trumped by short-term economic gains for a few is the long-term health of Western Oregon forests and symbiotic salmon runs. Risking the long-term health of Oregon's forests risks Ecosystem Services at a regional scale, not to mention the conflict that can easily rise should dry season water shortages start affecting the Americans that dwell within the lands adjacent to BLM O&C holdings with industry's attempt to access the last of Oregon's large trees. On the current trajectory, that conflict will arise. Don't blame me, I'm just the messenger.

Evaluation of hydrology, and geology (including slope stability) are essential tools in determining Effects to the Human Environment. BLM has consistently failed to perform adequate evaluation of these critical elements of the environment in SW Oregon. If the EPA can determine that other businesses, agencies, and Departments must value the worth of a human life in the millions of dollars, then BLM should do the same and quit hedging on what Americans living in rural Oregon value most. And yes, It is our lives, our health, our livelihoods that are put at risk. I beg BLM, Congress, and the Secretary of Interior to remember this fact when going forward with forest management in western Oregon.

Having said that, I applaud the efforts by our Congressmen and Drs. Jerry F. Franklin and K. Norman Johnson in creation of the Secretarial Pilot Projects. If BLM were to follow the rules and guidelines of their current Land Use Plan, know as the Northwest Forest Plan, on a state-wide scale, the Dry Forest Restoration Principles of forest management they describe in the "Restoration of Federal Forests" report could indeed provide a reasonable way forward to fulfill the Department of Interiors' promise to practice legal and sustainable management of Public Lands. While the Secretarial Forestry Demonstration Pilot projects hold great promise, the real question is this:

Can the Secretary of Interior actually keep that promise?

Gauging from the actions of BLM employees when not engaged in Forestry Pilot Project activities currently under way in SW Oregon, the answer is no. Please make the promise of viable forest management in Western Oregon reality by implementing the Johnson and Franklin Federal Forest Restoration Principles in keeping with the letter of the law. BLM will continue to intentionally fail the American Public otherwise.

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