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To: [BLM_OR_RMPs_WesternOregon](#)
Subject: Protect Precious BLM Forests
Date: Thursday, July 05, 2012 2:12:47 AM

As a concerned former resident of Oregon, who considers Ashland to still be my authentic home, I urge you to issue a new plan for BLM's forests in Western Oregon that breaks permanently and cleanly with the BLM's past practices of timber liquidation. I urge you to fully embrace an ecologically sustainable future that is more responsive to the current and future interests of Oregonians and Americans in an intact landscape. The prior Administration's "Western Oregon Plan Revision" constituted a straightforward mandate for the destruction of Oregon's federally owned forests, a destruction that might sadly be now be underway, had the BLM not been dragged with great recalcitrance back to reality via the courts. I sincerely hope that BLM will, in this latest iteration of its Western Oregon plan, voluntarily uphold its responsibility to protect our precious forests instead.

The prior WOPR's scale of logging and road construction was 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. It constituted an absolute repeal of the past two decades of scientific and social progress in forest management in the Pacific Northwest. I urge BLM to instead follow the prevailing trend in the Forest Service 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 must not attempt to re-ignite these insidious battles, particularly in the context of 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.

The BLM can best maximize America's net benefit from these ecosystems by protecting all remaining old-growth forests in Western Oregon, by keeping roads out of all remaining roadless areas, and selectively cutting only where efficacious and appropriate to restore historic stand densities. BLM lands in Western Oregon are riddled with second-growth forests that are already overstocked, fragmented, and degraded by past logging. The BLM could pursue 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 forest management that is more appropriate to an urbanized and heavily impacted Oregon. Too often, the BLM has advertised its timber sales as "restoration," only to mark large-diameter trees for cutting on the ground and exacerbate the very stand health problems it purports to address. If the BLM can, in the new Western Oregon management regime, match its employees' actions on the ground to the claims of its NEPA project documents, our forests will benefit greatly.

BLM must also staunch the metastasis of rogue mining claims across Southwest Oregon, spread by parasitic miners who convert our precious streams into muddy ditches for a few flecks of gold. These mining operations are enabled by a peculiar combination of sociopathic greed and a mining law that dates to an entirely different era of American history and landscape context. BLM must assert, once and for all, that this is not an appropriate use of BLM's lands that are worth far more to the American public with soil, vegetation, and wildlife than as disemboweled mud pits. Therefore, it must use the new western Oregon plan to withdraw all of its lands from new mining claims under the 1872 Mining Act, as its planning process allows if done before a claim is staked. BLM must also sternly police these withdrawals, as has already seen from its experience with various lawless criminal miners that any weakness of enforcement on its part will only invite further aggression.

A similar challenge in establishing rule of law exists in the management of off-road vehicle users. The plan should emphasize the closure of existing unauthorized, illegal, "user-created" routes that are bleeding soil into our streams. ORV use should be directed onto a finite number of clearly marked and mapped routes that can be policed and enforced with reasonable frequency given the staff time available. The plan must establish a clear, unambiguous, blanket prohibition on any off-route, cross-

country travel with civil fines commensurate with the level of resource damage this causes, and sufficient to meaningfully deter willful violators. The plan must also address the critical task of either repairing or closing and revegetating the backlog of old, unmaintained roads and trails. This is the first task to achieve before BLM even considers opening new routes or watersheds. The BLM should also not legitimize and reward bad behavior by designating "user-created" routes except through normal environmental analysis, and not give them an automatic leg-up in route consideration.

After so many decades of abuse, the BLM finally has both the scientific predicate and the legal imperative to protect and restore its precious lands and waters in Western Oregon. As a former resident of Ashland, I personally attest to the national significance of the forests that historical political contingency has bestowed upon the BLM, and which entrusted BLM with a stewardship mandate that it has often failed. I urge you to seize this opportunity, and secure a future for these lands that both current and future generations of Oregonians will be thankful for. Thank you for your attention to this urgent issue.

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