

January 11, 2008
To: BLM
Subject: WOPR comment
From: Roger W. Gracey
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I own Property located in T7S, R1E, section 1, adjacent to a BLM 40 acre parcel. Following are my comments concerning the WOPR.

1. In general, it is clear that the primary concern of the EIS is increased revenue from harvesting timber which is the focus of preferred plan action alternative number 2 and that other criteria is secondary. Revenue production as the primary criteria for management, especially of publicly owned land, is not proper planning.

2. My adjacent property contains a single family residential development and small wood lot, including mature merchantable timber. Other adjacent and surrounding properties include residential uses and Longview Fiber Co owned property.

3. The EIS fails to address the impact on adjoining wood lots of management and harvest practices on neighboring parcels. In my experience, logging of parcels, especially to the windward side, exposes adjoining wood lots to significant blow down and windfall damage. This negative impact potential on adjoining privately owned land has not been adequately considered, if at all, in the EIS action alternatives.

4. This BLM parcel is located in the Abiqua watershed area. The Abiqua creek is the source of the public water supply for the City of Silverton. While effect on watersheds are discussed in the EIS, the potential impact on public water supplies is not addressed.

5. Roads are discussed in the EIS, but only those roads within the BLM managed land. The effects of management and harvesting on adjacent public roads is not. This parcel adjoins a public county road, Briar Knob Loop. Clear cutting or regeneration harvesting could have a significant negative effect on this road from potential flooding and erosion given the fact it is located on the downhill slope from the BLM parcel.

6. Potential erosion, flooding and landslides is another concern. The recent flooding in Lewis County Washington is a recent example. According to news reports, the closure of Interstate 5 near Chehalis was, in large part, due to intensive logging.

7. Global warming was not mentioned in the EIS. The effects of global warming cannot

be denied. Equally apparent is that forests absorb carbon dioxide. No EIS or forest management plan can ignore global warming as a factor in adoption of the appropriate practice.

8. The Table 40 comparison demonstrates to me the reason for the preferred alternative number 2. It is the alternative which creates the most jobs and generates the most revenue, which is not to say that these are not desirable goals. However, it is out of balance with other relevant and crucial factors. In particular, it has the highest risk for intrusion of invasive plants, the most severe impact on NSO and MAMU habitat and botany risks, wilderness characteristics and soil disturbance.

In my opinion, based on the criteria included in the EIS, the no action alternative is the preferable choice. It is the superior choice of those considered related to all of the criteria except revenue production, which should be given the least weight when planning for the management of public land. That said, no final decision should be made without consideration of the additional factors mentioned above.

Respectfully submitted,

Roger Gracey
Carol DuBois