

Bureau of Land Management
Western Oregon Plan Revisins
POB 2965
Portland, Oregon 97208

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SEP 17 2007

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Sept. 13, 2007

Dear BLM Administrators:

I am a resident of rural Oregon and own, with my wife, about 90 acres of timber land. I understand that Alternative 2 of the W.O.P.R. is likely to be adopted, perhaps with some modifications. Unfortunately Alternative 2 is so grossly flawed that no amount of modification can avoid serious troubles for the BLM, the forests, threatened and endangered species, rural communities, and the people of Oregon. Specifically:

1. Scientific research indicates that forest recovery after a fire occurs fastest if there are no salvage cuts. Alternative 2 allows salvage cuts, including in Late Successional Management Areas. This is bad science, and it will encourage forest arson, which will impact not only BLM lands but private lands as well.
2. I live in a part of a county where, because of budget problems, law enforcement except for the most serious crimes, has effectively been eliminated. W.O.P.R. is supposed to remedy this kind of thing. The proposed increase in harvest is estimated to be as large as 7 times current levels. However, this cannot be sustained for long. Counties may enjoy timber revenues for a few years, but without non-timber sources of money, county revenues will inevitably crash, and we will be back where we are now, except with fewer trees.
3. In a time of global warming the role of forests for carbon-sequestration should not be ignored, even if the legal tools for defending this are only beginning to be forged. Recent court rulings, such as the Supreme Court's classification of carbon dioxide as a pollutant subject to EPA regulation, suggest that advocating increased cuts at this time shows willful ignorant of the situation, is confrontational, or both.
4. Reduction of the size of riparian zones will eliminate wildlife corridors and dispersal habitats, which will have especially serious consequences for some threatened and endangered species.
5. Alternative 2 takes substantial areas out of late successional reserve, and moves them into "Timber Management Areas" subject to increased cuts. This will result in the destruction of forests that are maturing, but not yet technically old-growth. Habitat for many species, including some that are threatened or endangered, will be further fragmented. The consequences will be especially serious in BLM units that under the Northwest Forest Plan have served as corridors from the Coast Range to the Cascades.
6. Alternative 2 promote aggressive clearcuts. It does not even require

leaving noncommercial snags and downed wood. Scientific studies indicate that snags and downed wood left in place help forests recover from cuts.

7. Alternative 2 reduces critical habitat units for spotted owls and marbled murrelets. These creatures are not only indicator species, but "charismatic". What this means to me is that when their survival is put at risk to serve nothing more than politics as usual and short-sighted economic interests, many people will get upset.

8. The reason there has not been an outpouring of public concern about W.O.P.R is that much of the literature put out by BLM has been technical, jargon-ridden, and difficult to understand. The draft summary is 1,600 pages long - almost unreadable for non-experts. Summaries are either buried in the text, overly simplified, or both. Meetings have not been well-publicized, and at least the ones that I have attended have been very poorly run. Newspapers have been late to pick up on the story. This may be because the Northwest Forest Plan, although far from perfect, has worked fairly well for the majority of Oregonians. The attitude is, if it ain't broke, don't fix it. There is a certain amount of disbelief that has had to be overcome. In short, it is a mistake to say that the public has really had an opportunity to become educated about this issue and speak out.

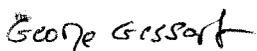
9. Judge Dwyer ruled that the Northwest Forest Plan had to be followed - "to the letter" I believe were his words - because it offered minimal protections for wildlife as spelled out in the Endangered Species Act and other legislation. Any compromise of the Northwest Forest Plan - which Alternative 2 proposes to do, as well as Alternatives 1 and 3 - will be in violation of the law and result in lawsuits. If the past is any indication, these will be expensive, time-consuming, and set citizen against citizen.

Alternative 3 is even worse than Alternative 2. Alternative 1, although in some details better than 2, compromises the Northwest Forest Plan, and so will lead to many of the problems that I have already mentioned.

The best alternative is the "No Action Alternative". The Northwest Forest Plan is flawed, and some counties, including my own face serious financial difficulties as a consequence of Congressional inaction. However, the proposed deviations from existing practice will make a less-than-ideal situation far worse.

Speaking more personally, no matter which alternative is chosen, please keep T.19S. R.06W. Sec. 17 as a Late Successional Reserve/Late Successional Management Area. This section, which is just a few miles from where I live, contains an exceptionally beautiful old-growth grove, called the Grandmothers of Wolf Creek. I visit it often to refresh my spirit and recall just how beautiful this land can be when lived with lightly.

Sincerely,



George Gessert