Eberhard Logging Inc.

67138 Moses Creek Lane
Elgin, Oregon 97827

Ph. (541) 437-6745

245

RECEIVED
OCT 3 2007

Dear Ed,

Our unhealthy West-Oregon BLM forests continue to face destructive losses from wildfire, pests, disease and storms. Also, the vitality of Oregon's rural communities and forest sector infrastructure suffer from declining federal forest management and timber supply over the past 17-years. The BLM draft Western OR Plan Revision (WOPR) preferred Alternative 2 is important progress to improve rural economies, timber infrastructure and forest health, and to prevent destructive losses.

Although Alternative 2 would be progress forward, I recommend that a new *"Modified Alternative 2 Plus"* be developed—which manages greater forest acreage and higher intensity. A *Modified Alternative 2 Plus* would be the best management approach to meet the immediate funding needs of local counties, while working to protect our environment. I urge you to apply due diligence to finalize the WOPR, and ensure that adequate funding is sought to implement the Plan. The WOPR should adhere to the following key principles:

1. Develop a new *"Modified Alternative 2 Plus"*— integrating greater management intensity and acreage
2. Harvest 960 million bdft annually; or 80% of the annual timber growth capability
3. Expand the harvestable land base to 60% of BLM forestland, to provide a stable timber supply
4. This increased timber supply would sustain a more vibrant Oregon timber infrastructure—manufacturing, logging, transportation, forestry, and other induced business
5. Increase the fire resiliency of the forests in Southwest Oregon by using active mechanical harvesting
6. Speed the redevelopment of structurally complex forests after regeneration timber harvesting by retaining 2-6 reserve trees/acre, down wood and diverse riparian trees
7. Accelerate recovery of damaged/killed forests—reduce waste of valuable timber and increase county revenues—by more aggressive use of salvaging, site prep, vegetation control and reforestation
8. Help recover the northern spotted owl and marbled murrelet, by: a) mechanical harvest to provide a range of different structures that maintain a dynamic forest landscape over space & time; and b) adopt improved species take avoidance strategies that utilize mechanical harvest for desired habitat diversity
9. Timber harvest to generate over 100% of annual county subsidy paid from Secure Rural Schools Act
10. Minimize threat of destructive loss on BLM lands, and BLM threats spreading to non-federal neighbors
11. Improve road access & easements through BLM lands for non-federal property access and rights-of-ways, as well as for BLM management and recreation uses
12. Favor active management for habitat maintenance, rather than passive "reserve" strategies
13. Avoid unnecessary restrictions that become barriers to road construction and active harvesting
14. Encourage local management flexibility and professional discretion tailored to local conditions

Of the three alternatives being considered by the BLM, I urge you to adopt a new *"Modified Alternative 2 Plus"*— that would harvest 960 million bdft annually. This *Modified Alt. 2 Plus* would meet the funding needs of local counties, provide needed timber supply and improve forest health, while also protecting our environment. I look forward to working together toward finalizing the WOPR Plan, and ensuring that it receives adequate funding to be fully implemented.

Thank you for understanding the importance of economic vitality in Oregon's forest sector, and its vital contributions toward rural communities, Oregon's economy, and health of BLM forestlands.

Sincerely,

Kenneth F. Eberhard