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Ed Shepard
Bureau of Land Management
333 SW 1st Avenue
Portland, OR 97124

As one Commissioner, I respectfully request a 120-day extension to the 90-day public comment period for the Bureau of Land Management's Draft Environmental Impact Statement for the six western Oregon BLM districts (respectively "BLM" and "BLM DEIS").

I am not in a position right now to support the BLM DEIS' preferred alternative. I feel this way for several reasons.

First, I simply haven't had enough time to fully digest this document. The BLM DEIS is 1,650 pages long.

Second, a preliminary review of this document suggests that the preferred alternative is a dramatic change of direction for the relevant BLM's lands—back toward an industrial timber model. For example:

1. During the first decade of the plan, the BLM's Preferred Alternative #2 sets the Salem District with the highest annual timber output of all five BLM Districts—184 million board foot (MMBF) (DEIS Vol. II page 569). Why would the BLM locate their highest timber management output near Oregon's population centers? This proposed volume ramps up timber cutting by an increase of almost 160% of the current management plan.
2. Alternative #2 designates all BLM lands in Washington and Columbia Counties (except for new reduced riparian protection areas) as an intensive "Timber Management Area" and fails to designate any agency land in our region as Late Successional Management Area. This seems odd in view of the expressed concerns over clearcutting by voters in Washington County (as revealed in many polls) and our need for quality recreation opportunities.
3. The current forest plan (DEIS No-Action Alternative) designates much larger riparian protections and protects a modest area of older forest in Washington and Columbia Counties. The proposed alternative does not. DEIS Vol. II page 731 illustrates the severe reduction in stream protection between Alternative 2 and the current management plan.

4. The BLM uses the term "regeneration harvest" for timber cutting instead of clearcutting. Terms like "regeneration harvest" provide little insight into what actually will occur on-the-ground and raises suspicion over the agency's intentions. DEIS Vol. II page 578 indicates that the majority of timber cutting in the preferred alternative for the Salem District will be clearcutting. This is totally unacceptable.
5. DEIS Vol II page 543 indicates that the high timber production Alternative 2 will provide a gain of 90 jobs to Washington County over the current forest plan. A gain of 90 jobs at the expense of riparian and rare older forest protections makes little economic sense for this County.

My concern was further heightened when I read the enclosed editorial by Dave Toler, Josephine County Commissioner (Oregonian, 23 Sept, p. D6). I too am skeptical that the volumes of timber suggested in that editorial for western Oregon will materialize, or are appropriate.

BLM ought to provide interested parties and public with a 120-day extension to comment upon the above resource management plans and BLM DEIS. What we now have is a short 90-day public comment period, much of which time has already transpired. I think an additional 120 days for public comment would put me and many others in a far better position to make good comments, better protect our County's forest resources, and better meet the needs of Washington County's 520,000-plus residents.

Sincerely,

Dick Schouten

Washington County Commissioner Dick Schouten (Aloha, Beaverton and Cooper Mt.)

Enclosure

Cc: Board of Washington County Commissioners (with enclosure)
Robert Davis (with enclosure)
Dennis Mulvihill (with enclosure)
Shelby Rihala (with enclosure)
Senator Ron Wyden (with enclosure)
Senator Gordon Smith (with enclosure)
Representative David Wu (with enclosure)