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September 30, 2007

Western Oregon Plan Revisions
P.O. Box 2965
Portland, OR 97208

Re: BLM DEIS COMMENTS

With a few strokes of the pen the Bureau of Land Management casually proposes to dismiss its mismanagement of the O&C lands during the past 17 years. Although millions of dollars have been lost, thousands of livelihoods destroyed, and an entire industry decimated, the agency does not accept the responsibility or the blame for the economic havoc it has wreaked on Western Oregon.

Golly, "the BLM has not been achieving the timber harvest levels directed by the existing plans...." Oh well, let's just forget the nearly two decades of mismanagement and lost resources. Let's just deny the fiscal crisis foisted on county governments. Let's pretend there is no forest health crisis. Let's ignore a forest road system that has cost millions of dollars to build. Instead, let's just make a new plan and re-focus to comply with the legal mandate required by the O&C Lands Act of 1937. We've ignored that law long enough!

And we'll all live happily ever after.

The Northwest Forest Plan of 1995 directed and provided for a minimum and predictable harvest level of federal timber. Since the Plan's inception, neither the BLM nor the US Forest Service has ever come close to offering that level of timber for sale. While the timber industry was forced to accept the

small, seldom-seen seabirds. This bird is already living at the edge of its habitat range in Oregon, thus accounting for its low population. The BLM is concerned that the murrelet ought to flourish where it has barely survived for centuries. No, there should be no extreme provision to protect this bird on O&C lands. There will still be millions of wilderness acres, parks and protected areas in Oregon and Washington to provide habitat for these robin-size birds.

Most access roads in the forest have already been built and paid for by timber companies. These roads have, for the most part, stabilized and offer a very low risk of failure or sedimentation. If the BLM no longer wishes to maintain these valuable improvements, the agency ought to seed, waterbar, and gate these roads rather than pursue its expensive road obliteration program. A gated road will still offer hikers, hunters, and horseback riders access into our back country. Seeded with grass, the road prism will be stabilized while offering valuable forage to deer, elk and other wildlife. In fact the decommissioning and obliteration of roads can actually increase the amount of sediment delivered to streams for many years. Without a system of forest roads, only a few healthy hikers will use the forest. Fire fighting efforts will be hampered as crews will be forced to hike miles to a fire that might otherwise have been controlled by a 250-gallon pumper truck.

Alternative 2 proposes to harvest dead, down and dying timber in the years to come. It seems downright silly for the BLM to obliterate roads now and then offer a salvage sale that requires roads to be built into the same area. Isn't it more logical to simply seed and gate these roads that may someday be reused for fire suppression and timber harvest?

"Clear cut" and "timber harvest" are not some profane and dirty words to be avoided in polite society. These practices have both silvicultural and social benefits that preservation management cannot provide. Douglas fir does not grow in the dense shade of towering trees; it must have full sunlight offered by a clearcut or crown fire. Jobs are not created by a dozen Sierra Clubbers hiking into a remote mountain valley; loggers and mill workers have jobs when the timber is harvested.

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Alternative 2 would allow timber harvest on just 54% of the O&C lands, a considerable increase from the 20% outlined in the Northwest Forest Plan. Even this new proposed harvest level will be carefully planned and monitored to protect environmental quality while 46% of the forest will see no timber harvest. Zealots may again cry that the timber industry will rape and pillage our federal forests, but the 54-46% ratio is a reasonable compromise of management and preservation.

And, we must remember that the BLM lands represent only a small part of the entire forest. There are still millions of acres managed by the US Forest Service, National Park Service, Fish & Wildlife Service, and the State of Oregon where trees are preserved. Additionally, there are millions of acres of private timber land protected by the Oregon Forest Practices Act.

It is past time for the Bureau of Land Management to return to its roots, to return to its original and legal mandate as approved by the US congress in 1937:

“for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the principle of sustained yield for the purpose of providing a permanent source of timber supply...and contributing to the economic stability of local communities and industries....”

Sincerely,


Mickey Bellman