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OCT 05 2007

Ed Shepard, State Director  
Bureau of Land Management  
Western Oregon Plan Revisions  
P.O. Box 2965  
Portland, OR 97208

October 2, 2007

Dear Mr. Shepard,

As both Oregon citizens and landowning neighbors of the Bureau of Land Management (BLM) in several western Oregon counties (Benton, Lincoln, Polk and Lane), we would like to make comments on your August 10, 2007 draft Environmental Impact Statement (EIS) for the revision of the Resource Management Plans of the Western Oregon Districts and, in particular, on your preferred "Alternative 2" action plan identified in the EIS.

We appreciate the very extensive public outreach effort the BLM is making to inform and listen to citizens about your proposed land management changes in the draft EIS and it's three "action alternatives". Here are our thoughts:

### A Case for a New Management Plan For Western Oregon BLM Lands

Findings of the BLM that led to plan revisions:

- Current management is falling far short of timber harvest goals.
- Current management is failing to deliver statutory mandates under the O&C Act.
- Plan revisions could help the BLM lands mesh with new habitat goals, including early successional habitats.
- New harvest levels will be needed to compensate O&C counties for projected loss of the Secure Rural Schools (SRS) payments.

Three alternatives to the current management plan for western Oregon BLM lands were developed for the 8/10/2007 draft Environmental Impact Statement, to address the

deficiencies bulleted above. After exhaustive analysis which included studies on socioeconomics and ecological outputs of the three alternatives, your planners and managers selected Alternative 2 as their preference because, “this alternative would best fulfill our statutory mission and responsibilities” (from Ed Shepard’s EIS cover letter).

Reasons that we support the BLM findings and Alternative 2:

- The pending loss of SRS payments to counties is real and dramatic. Over \$100 million in annual funds will be lost, in total, to western Oregon counties if BLM management plans aren’t revised and harvest levels increased.
- Only Alternative 2 comes close to matching recent SRS payments to counties.
- Alt. 2 is projected to add 3,442 much needed rural jobs (\$136.5 mill.)
- Environmental standards are maintained, with a wider range of habitat types.
- The analysis predicts only a 1% shift in structural stage abundances between alternatives, within 100 yrs. All three alternatives accomplish this habitat goal. Alternative 2 will provide the broadest array of habitat types and provide multiple other benefits, in addition.
- Forest growth rates will continue to exceed annual harvest rates, assuring an increasing supply of older forest and associated habitats into the future.
- Fish, water quality, T&E species habitat, wildlife, fire risk, recreation, air quality, soil productivity all accounted for under Alt. 2, with assessments similar to the other alternatives.
- BLM lands cover 2.6 million acres of W. Oregon forests...enough to have a big impact on sustainability and the economic health of rural counties.
- Supporting Alternative 2 supports the extensive work of the multidisciplinary professionals who developed the EIS.

We agree that it is time to update Western Oregon BLM management plans in order to allow your agency to better meet it’s multiple objectives and statutory obligations. The clock is winding down on federal Secure Rural Schools payments to counties. It is time to put these forestlands back to work.

In summary, Starker Forests supports the 8/10/2007 draft EIS and your preferred Alternative 2 action plan. Thank you for considering our thoughts on this important proposal and please contact us if you have any questions.

Sincerely,



Bond and Barte Starker  
Starker Forests, Inc.