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

Dear Sir or Madam,

I am writing to provide my input into the public comments for the Western Oregon Plan Revisions.

As an elected official in Oregon, I am very concerned for the people I represent and my community that the Bureau of Land Management (BLM) is proposing to aggressively change its management of the 2.5 million acres of land it manages in trust for Oregonians and the American people.

In 1994 the Northwest Forest Plan was adopted by federal agencies for managing the Westside forests in Oregon, Washington, and Northern California. Leading up to the Northwest Forest Plan, our communities and region suffered from uncertain, unstable and unpredictable shifts in federal policy. This uncertainty led to the polarization of citizens and communities as well as creating an unpredictable regulatory environment where businesses and citizens could not reliably plan for the future. Often we witnessed one federal agency fighting with another federal agency in determining what should happen for land management in the Northwest. With the creation and implementation of the Northwest Forest Plan, there is coordination and unified direction from federal agencies for land management which has provide stability and predictability regarding the management on these federal lands, including the 2.6 million acres of BLM managed forests.

BLM has an opportunity to build community support for actively managing these forests but the alternatives presented seem to unduly focus on higher levels of timber production at the expense of all the other values that standing forests provide for communities and Oregonians. It is unfortunate that BLM chose to evaluate only a very narrow range of alternatives.

I am concerned that the DEIS does not tackle the job of quantifying the economic benefits that standing forests provide----real tangible benefits with price tags derived from ecosystem services such as providing a source of clean drinking water for communities. There is an analysis of the socio-economic impacts of timber, but the DEIS skirts over quantifying the economic benefits for fishing, hunting, recreation, tourism, impacts on drinking water and other societal benefits of these lands. As importantly, the DEIS does not articulate the substantial quality of life values provided by these public lands, and does not try to quantify the tangible economic benefits resulting from their protection.

I am also concerned that the BLM is investing so much of our nation's resources and the public's energy in presenting such a faulty plan that is not likely to be implemented. BLM anticipates that it will take two years to fully implement your preferred alternative. Given

such extensive public opposition, controversy and polarization caused by BLM's proposal, it is unlikely that the next administration will actually support this revision.

And while your stated inability to deliver the timber sales you'd like to deliver under the Northwest Forest Plan is due in part, according to your information, to the fact that you have not received sufficient funding over the last decade, it does not seem realistic to expect to receive a 60% increase in your budget, which BLM states would be needed to implement the preferred alternative.

I am very concerned that that climate change issues are not fully articulated or addressed—both its impacts on the forests on O&C lands and how those lands can help mitigate its impacts to our communities. Climate change issues are receiving substantial attention from the Administration and Congress. In August 2007, the General Accounting Office (GAO) released a report highlighting the need for federal land management agencies to consider the impacts of climate change in their management actions.

On a more local level, I am one of the many county commissioners from an O&C county who thinks the WOPR has been a disservice to both the American public and the residents of counties which have grown to depend on federal funds—whether from logging public resources or the US Treasury—to provide county services. I agree with the recent editorial in the Eugene Register-Guard:

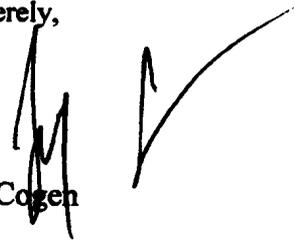
“By blindly plodding forward with this flawed plan, the administration is missing a prime opportunity to craft a forest management strategy that increases timber production through means other than clear-cut logging in old-growth forests. . . .

scrap the BLM's misguided plan and demand a new one that produces more timber, while at the same time protecting spotted owls, Northwest rivers and the fish that live in them.”

My constituents strongly believe we should protect our remaining old growth forests, and focus active management on those parts of the forest that need restoration. Such an approach would serve the additional goal of providing increases of timber commodities for timber mills. BLM has a wonderful opportunity to take such approach, and benefit from substantial public support for its initiative. Please do not squander this opportunity.

Thank you for considering these comments.

Sincerely,


Jeff Cogen