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January 2, 2008

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

RECEIVED

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RE: Comments on Draft EIS for the Revised Resource Management Plan

Dear BLM:

These comments represent the concerns of the 250 members of the **Umpqua Valley Audubon Society**.

General

Our major issue is the DEIS's focus on logging of **Old Growth Stands of Trees**. As you know, these stands have essentially been eliminated on private lands and the BLM lands represent one of the few areas where fragments of old growth forest remain. It takes hundreds of years for a young plantation to develop into an old growth stand with the characteristics necessary to support old growth dependent wildlife. If short-sighted timber harvest practices destroy these old growth trees, there is no way to bring them back. Therefore, we feel your final preferred alternative **must include the preservation of critical old growth trees.**

The O&C act was passed in 1937, over 70 years ago when there was little recognition of the importance of Old Growth Species to wildlife and to the esthetic beauty of the area. The Act did recognize the importance of **sustainability**. We feel that if the act were passed today, sustainability would definitely include sustainability of our all wildlife populations. We urge you to include this balance in the final recommended Alternative. Otherwise, you will face tremendous obstacles in trying to implement your new plan from the community who values wildlife and believes in protecting its critical habitat.

Specific

Non-Listed Wildlife. Although the Alternatives in the DEIS claim to address wildlife that is listed under the Endangered Species Act (such as spotted owls). The plan does not adequately address other non-listed species and the probable negative impact on these species of increased logging. Especially the reduction of stream-side buffers and the logging of old growth stands.

OHV Use. The DEIS also includes increased land that allows Off Road Vehicles. OHV use is extremely damaging to the land and the wildlife. We urge you not to increase the areas that are designated for OHV use.

Proposed Alternatives. We feel the No Action Alternative – Northwest Forest Plan Management is the only acceptable alternative. Of the action alternatives, Alternative 3 is the least damaging to our forests. BLM’s proposed Alternative 2 is totally unacceptable to us. BLM should focus its forest management on commercial and non-commercial thinning of the thousands of acres of second growth stands and make them truly sustainable and fire resistant.

Sincerely,

A handwritten signature in black ink that reads "Stanley Vejtasa". The signature is fluid and cursive, with the first name "Stanley" written in a larger, more prominent script than the last name "Vejtasa".

Stanley Vejtasa
Conservation Chair
Umpqua Valley Audubon Society
312 Impala Drive
Roseburg, OR 97470-8883

CC: Gladys Claiborne, President UVAS