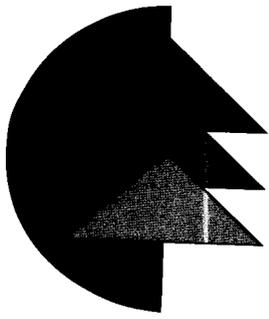


1876



**OREGON
LOGGING
CONFERENCE**

P.O. BOX 10669
EUGENE, OREGON 97440
(541) 686-9191
FAX (541) 686-0176

December 29, 2007

RECEIVED

JAN 11 2008

Bureau of Land Management
Western Oregon Plan Revision Office
Attn: Mr. Ed Shepard, State Director
P.O. Box 2965
Portland, Oregon 97208

Dear Mr. Shepard:

The Oregon Logging Conference Board of Directors wish to submit the following comments on the BLM's Draft Environmental Impact Statement (EIS) for the Revision of the Resource Management Plans for Western Oregon.

The preferred alternative represents a significant step towards restoring the intent of the O&C Act and the commitment it made to the economic development and maintenance of western Oregon counties dependent on federal forest resources. However, in our opinion, none of the presented alternatives fully meet the legal mandate of the O&C Act. The act has been consistently interpreted by the courts to be a "dominant use" law, placing the sustainable production of timber as the primary use of the O&C lands. The preferred alternative, which produces the most timber of the three alternatives, would manage less than half the suitable forest land for timber production. While we appreciate the fact that you must comply with other laws, such as the Endangered Species Act (ESA), we believe leaving over half the land in reserves is inconsistent with the law. The BLM must display an alternative in the final EIS that maximizes the amount of O&C lands in timber production and receipts to local county governments consistent with meeting a no jeopardy opinion under the ESA.

In general, we believe a reserve strategy for protecting species listed under the ESA is inconsistent with the O&C Act. The BLM should consider active management for the protection of listed species and sensitive species utilizing the most current scientific information available before resorting to set aside reserves. It is important, however, that the final alternative selected is one that will not jeopardize the continued existence of listed species within its entire habitat range.

As you know, counties in western Oregon where the federal government is a major landowner are facing tremendous financial uncertainty. The O&C Act was intended to provide a permanent and reliable source of revenues to fund county functions. The Northwest Forest Plan adopted in 1994 has failed miserably in fulfilling this commitment. The Western Oregon Plan Revision presents a historic opportunity to restore the financial pipeline

from the forests to the communities that were once told they could rely on this source of funding. The welfare of these communities should be the most significant factor in making a final decision.

Finally, questions have been raised regarding the sustainability of the alternatives presented in the draft EIS. We believe the data show that, if anything, the alternatives present very modest levels of harvest that will allow the continued growth of timber inventory. This could lead to a serious forest health problem similar to what is occurring on the national forests. Between 1946 and the early 1990's over 40 billion board feet of timber was harvested off the O&C lands while the standing inventory volume remained between 46 and 50 billion board feet. The BLM was harvesting approximately what was growing every year. The Northwest Forest Plan reduced harvest levels dramatically. Consequently, today, there is over 70 billion board feet of standing inventory on these lands. This could be a recipe for environmental disaster if left unchecked. The final decision should be the adoption of an alternative that establishes a harvest level that approximates annual growth.

The Oregon Logging Conference Board of Directors appreciates the opportunity to comment on the Western Oregon Plan Revision draft EIS.

Sincerely,

Oregon Logging Conference Board of Directors