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To: Western Oregon Plan Revisions  
P.O. Box 2965  
Portland, Or 97208

Date : January 8<sup>th</sup>, 2008

From : Mitch Williams  
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Mr. Shepard:

After thorough review of the WOPR I have come to the following conclusion: Alternative 2 should not be chosen. The NO ACTION ALERNATIVE is the only responsible chose for the following reasons:

- 1) The ASQ in ALT 2 is not sustainable. 727 mmbf ASQ = increase of 2 2/3 volume. This is unsustainable. The 1<sup>st</sup> decade equates to 224 square miles clearcut. This is NOT sustainable.
- 2) There is no defendable / rational economic analysis. The wholesale liquidation of OUR natural resources to fund recurring annual expenditures within the Oregon O & C counties is malfesance. The Federal Governments lack of sound economic analysis is abominable & indefensible.
- 3) In chapter 4 - pg 491- Environmental consequences -section on climate change -there is reference to "SPECULATIVE" concern for climate change. The documents handling/ position is overtly political with a complete aversion & recognition of the vetted science. The conversion from old growth (" structurally complex" as WOPR refers to ) acres into even aged stands ,sets the stage for cataclysmic wildland fires.
- 4) The reduction & loss of more than 2/3rds closer to 3/4ths riparian reserve does not contend with and completely ignores on going species recovery & habitat conservation strategies . As required under multiple Federal acts. The buffer reductions could impact adjacent non-BLM land owners and will certainly impact fish & wildlife. The effects will also impact domestic water users & providers by negatively effecting Quality ,Quantity & Temperatures.
- 5) The economic & environmental effect of increasing by twofold the road construction (volume 2, pg 493) is not analyzed at all. With climate change ,comes increased precipitation & landslides .Effects on wildlife , fish & other aquatic species & game animals ( i.e. ELK ) was not considered at all. Nor is the cost analysis of maintenance & or construction. The backlog of maintenance needed on existing public lands "roads" is in the hundreds of millions of dollars. No mention nor dialog was included in the WOPR analysis regarding these effects.
- 6) Invasive weeds / plants analysis in Alternative 2 does not comply with Executive Order 13112 on pg A936. The statement on pg, 631 in Alternative 2 would "have the greatest risk of introducing invasive plant species infestation " . This is contrary to the Federal Governments established orders and is not appropriate.

In closing I reiterate that Alternative 2 should be abandoned, and the NO ACTION ALTERNATIVE - I.E. the NW Forest Plan should remain intact

Please include my comments into the Federal record and keep me on your mailing list.

Respectfully,

Mitch Williams P.O. Box 291 Brightwood, Oregon 97011

