



January 9, 2008

1965
WASHINGTON COUNTY

OREGON

Ed Shephard
State Director for Oregon/Washington
Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

RECEIVED

JAN 14 2008

Re: Western Oregon Plan Revisions EIS Comments

I am writing to provide my input into the public comments for the Western Oregon Plan Revisions (WOPR). I am writing in my capacity as one Washington County Commissioner, representing Aloha, Beaverton and Cooper Mountain. My district contains over 125,000 residents.

I am concerned 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. BLM has an opportunity to build community support for actively managing these forests but the alternatives it presented unduly focus on higher levels of timber production at the expense of all other values that standing forests provide for communities and Oregonians. "Other values" that also make for sustained timber yield.

It is unfortunate that BLM chose to evaluate a narrow range of alternatives. Specifically, I am concerned the Draft Environmental Impact Statement (DEIS) does not quantify the economic benefits that standing forests provide---real tangible benefits with price tags derived from ecosystem services such as providing 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 BLM is investing so much resources and the public's energy in a faulty plan not likely to be implemented. BLM anticipates it will take two years to fully implement its preferred alternative. Given such extensive public opposition, controversy and polarization caused by this proposal; it is unlikely that the next administration will support this revision. Every day we move ever deeper into the 21st Century and further from the 19th!

Beyond my expectations re our changing times and ever better understanding of timberlands, is BLM's own stated inability to deliver the timber sales it'd like under the Northwest Forest Plan due to sufficient funding over the past decade to make such deliveries. It does not seem realistic that your agency will receive the 60% budget increase you state is needed to implement the preferred alternative.

Board of County Commissioners

155 North First Avenue, Suite 300, MS 22, Hillsboro, OR 97124-3072
phone: (503) 846-8681 • fax: (503) 846-4545

I am also concerned 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 now receiving substantial attention from the Administration and Congress. In August 2007, the General Accounting Office 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 think 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. . . . [S]crap 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,



Dick Schouten
Washington County Commissioner for District # 1 (Aloha, Beaverton and Cooper Mountain)

Cc:

Washington County Board of Commissioners
Robert Davis, County Administrator
Dennis Mulvihill, Government Affairs Officer
Shelby Rihala, Government Affairs Assistant