

stands is incredulous, but assuming that there is any such thing as tree stand “sustained yield management” is even more incredulous. **The outcome of incredulous DEIS tree stand biased information is an incredibly incredulous tree stand plantation system DEIS.**

“Selecting a Preferred Alternative” (Page 7)

“In selecting among the alternatives in this plan revision, the BLM will evaluate which alternative or combination of alternatives best meets the Purpose and Need.” (Page 7)

The WOPR DEIS Team incorrectly used a Glossary of tree stand definitions, consequently forest “Purpose and Need” assumptions incorrectly became tree stand purpose and need assumptions.

“An environmental impact statement must rigorously explore and objectively evaluate all reasonable alternatives. The range of alternatives is limited by the requirement to fulfill the purpose and need, which is the reason or reasons for the agencies to be proposing action. See Chapter 1 for the purpose and need.” (Page 104)

WOPR’s tree stand management assumptions, make reasonable Alternative assumptions relative to creating and sustaining tree stands, not forests. WOPR’s tree stand management purpose and need, served as rationale for rejecting forest ecosystem alternatives such as the NSA. WOPR’s rejection of forest ecosystem alternatives, means neither forest nor human community “purpose and need” would be achieved.

“Alternatives Considered but Eliminated from Detailed Study” (Page 104)

“An environmental impact statement must rigorously explore and objectively evaluate all reasonable alternatives. The range of alternatives is limited by the requirement to fulfill the purpose and need, which is the reason or reasons for the agencies to be proposing action. See Chapter 1 for the purpose and need.” (Page 104)

BLM states: “The range of alternatives is limited by the requirement to fulfill the purpose and need.” When purpose and need is based on tree stand management, the NSA can’t qualify. However, the NSA did meet the BLM Medford District EIS purpose and need, so why doesn’t it also meet the WOPR purpose and need?

If the NSA violates the usual and proper forest tree stand thinking that got us into this mess, those perspectives must be changed.

The WOPR states: “An environmental impact statement must vigorously explore and objectively evaluate all reasonable alternatives.” **BLM did not meet this criteria for the NSA alternative.**

“When an alternative is eliminated from detailed study, it is because it was found to be unreasonable in some way. An alternative may be found to be unreasonable when it:

1. Does not meet the purpose and need.

2. Is substantially similar to an alternative being considered in detail or it would have substantially similar effects to an alternative being considered in detail.
3. Would not be feasible or practical to implement.
4. Would be exorbitant to implement.
5. Cannot be analyzed for its effects because of its implementation being remote or speculative." (Page 104)

Forests and communities ignored

The NSA is an ecosystem centered natural selection based approach to retaining and sustaining forest ecosystem species and human needs; it uses the same basic relationships that the other species have been sustainably using for millions of years. It is based on the only proven sustainable regulatory system of forest relationships that has ever sustained forests. The NSA may be the only alternative that addresses virtually every major social, environmental and

economical issue, including timber production. When tree-stand management assumptions drive forest "purpose and need", alternatives such as the NSA that do meet forest and human species needs are rejected because BLM incorrectly claims they do not meet their criteria. **Creating tree stand forest management "Purpose and Need" assumptions for public forests, demonstrates that the WOPR DEIS Team lacks credentials for developing a sustainable Western Oregon Forest Plan.**

When tree-stand management assumptions drive forest "purpose and need", alternatives (such as the NSA that does meet forest and human species needs) are eliminated simply because they cannot meet the WOPR Team's tree stand management criteria, the WOPR becomes unacceptable.

Similarities

The NSA is definitely not "substantially similar to an alternative being considered in detail" and it certainly would not have similar effects" because it retains forests that look like natural forests, feel like natural forests, and function as natural forests. Unlike BLM's WOPR selected Alternatives, hikers in NSA forests are not generally inclined to notice that timber and other products are being extracted from them.

Unlike BLM's WOPR selected Alternatives, hikers in NSA forests are not generally inclined to notice that timber and other products extracted from them.

Exorbitant

If the NSA is "exorbitant" in some way, it wasn't identified. If it violates some law, none were identified. If the NSA violates the usual and proper forest tree stand thinking that got us into this mess, those perspectives must be changed. **The NSA was not credibly analyzed, and there is no credible justifications cited for rejecting it.**

Feasible or practical

No tree stand management plan, such as WOPR's Alternatives, has matched the NSA for sustaining private forests and their owners. If the NSA is best for private forests and their owners, then why isn't it more feasible and practical for public forests?

Analyzing for effects

The NSA extracts only the timber that is dying or dead, conditional upon meeting forest species needs. This means that only the timber that any given forest can sustainably produce at any given point of time is the maximum amount that can be removed. The NSA is about as simple as a timber extraction plan can get.

If the NSA "cannot be analyzed for its effects because of its implementation being remote or speculative," the BLM has no credentials for managing public forest land. **If the BLM WOPR Team can't analyze how much timber a natural forest produces, how can they be expected to analyze what a non sustainable tree plantation will produce?**

The BLM argument for the WOPR is, timber yields did not meet expectations. The simple reason timber yields did not meet expectations is, timber extraction exceeds what BLM-managed forests are capable of sustainably producing. BLM has always been wrong on their projections of sustainable timber yield from their managed forests. The NSA would force BLM to become honest.

"Purpose and Need for the Plan Revisions" (Page 3)

"The purpose and need for this proposed action is to manage the BLM-administered lands for permanent forest production in conformity with the principles of sustained yield, consistent with the O&C Act." (Page 3)

"Principles of sustained yield"

A credible WOPR DEIS must scientifically evaluate alternatives for meeting all forest ecosystem species, their peculiar functions, and their peculiar environments; it didn't. A DEIS must also evaluate other species needs to fulfill "permanent forest production" or "sustained yield;" it didn't. The DEIS "must rigorously explore and objectively evaluate all reasonable alternatives" for their ability to have a sustained yield of all forest values and uses; it didn't. **Omitting basic biological and ecological sustained yield requirements, causes the WOPR to not meet "purpose and need for it's plan revisions."**

The DEIS "must rigorously explore and objectively evaluate all reasonable alternatives" for their ability to have a sustained yield of all forest values and uses; it didn't.

Incredulous species separation

There is no scientific evidence which proves humans know how to manage forests for "permanent forest production." The O&C Act

The WOPR cannot achieve "permanent forest production" without first retaining forest species, their environments, and their needs.

requires “permanent forest production in conformity with the principles of sustained yield”, which requires retaining the species that created and sustained forest ecosystems across the landscape. The WOPR cannot achieve “permanent forest production” without first retaining forest species, their environments, and their needs. **Species cannot be segregated from habitats that sustain them, to habitats that can’t sustain them (like humans) and be expected to sustain forest ecosystems, but that’s what WOPR’s tree-stand Alternatives would do.**

Incredulous references

A credible DEIS would evaluate alternatives in terms of cumulative effects on biological, ecological, economical and natural selection outcomes. **The WOPR DEIS refers to other incredulous tree stand references instead of science to support its Purpose and Need assumptions.**

A credible DEIS would evaluate alternatives in terms of the cumulative effects on biological, ecological, economical and natural selection outcomes.

Incredulous values

A credible Balance Sheet analysis of proposed actions that show values of everything both before and after each action is just as essential for evaluating forest business sustainability as it is for other businesses. An outcome analysis of proposed actions is an essential ingredient to determining whether or not an Alternative would be sustainable. **The WOPR DEIS Purpose and Need disregards biological, ecological, environmental and economic outcome realities.**

An outcome analysis of proposed actions is an essential ingredient to determining whether or not alternatives are sustainable.

“Alternatives Considered but Eliminated from Detailed Study” (Page 104)

Natural Selection Alternative

The NSA is based on the same time tested and proven natural-selection-based relationships that sustained species for millions of years, whereas the Preferred Alternative is based on failed tree stand management experiments. The same thinking that causes forest failures, was used to develop WOPR Alternatives, including the Preferred Alternative that would hugely accelerate forest and community failures. **The community supported NSA would meet the Purpose and Need for forest and human community survival, the Preferred Alternative would not.**

The same thinking that caused forest failures, was used to develop all alternatives, including the Preferred Alternative that would hugely accelerate forest and community failures.

Dysfunctional thinking

The same thinking that caused our forest and community catastrophes, were used to write a Preferred Alternative that will worsen forest and community conditions. **Why isn’t achieving**

sustainable forest ecosystems and human communities a DEIS Purpose and Need? Why does the DEIS view, prioritize and treat forests as tree stands for timber when other biological and ecological values are enormously more valuable for sustaining forests and human communities?

“The Alternatives” (Page 64)

“This section describes what is unique between the individual alternatives. The previous section identified the land use allocations, management objectives, and management actions that would apply to the resources, programs, and land use allocations under the three action alternatives.” (Page 64)

The Natural Selection Alternative would have provided a solution (unlike the four Alternatives selected), but it was rejected.

“Management actions would be used only where and when necessary and practical to achieve management objectives. The following would be among the considerations in determining how and where to appropriately implement management actions:

Human needs from forests have historically been sustainably met from natural forests, not managed tree stands, and they would continue to be met through the NSA.

- Site-specific circumstances made the application of the management action unnecessary to achieve resource management plan objectives.
- Site-specific circumstances made the application of the management action impractical.
- The application of the management action would be inconsistent with other resource management plan decisions.” (Page 64)

WOPR management action has to address “site-specific circumstances” such as ecosystem subsets to achieve sustainable timber yields. The NSA does site specific analysis, and we think it is necessary. We think all management plans should be specific regarding management of forests.

Natural ecosystems all function in essentially the same basic ecological ways. Management becomes necessary when humans want to convert natural forests into something else such as tree stands. WOPR management

actions are inconsistent with retaining forests that other species create and sustain. **All WOPR DEIS chosen alternatives are inconsistent with sustaining natural sustainable forest ecosystems.**

WOPR management actions are inconsistent with retaining forests that other species create and sustain.

“Activities that are not specifically mentioned in management actions would be permitted if they are not inconsistent with management objectives.” (Page 64)

DEIS tree-stand “management objectives” are inherently inconsistent with sustaining healthy forests. The NSA is consistent with sustaining healthy forests, including optimal timber production; but the proposed alternatives are inconsistent with sustaining either forests or timber. **Why did the WOPR DEIS Team make such an incredibly huge mistake of not including the NSA?**

The NSA is consistent with sustaining healthy forests, including optimal timber production; but the proposed alternatives are inconsistent with sustaining either forests or timber.

“Preferred Alternative” (Page 64)

“The preferred alternative is the alternative that best meets the purpose and need (see Chapter 1). Based on the analysis in this draft environmental impact statement, the BLM identifies Alternative 2 as the preferred alternative. Considering the economic, environmental, social, and other selection factors, the BLM believes this alternative would best fulfill its statutory mission and responsibilities. Alternative 2 would:

- contribute to the recovery of species listed under the Endangered Species Act,
- maintain or improve water quality,
- reduce fire hazard risks in most districts,
- meet recreational demand with a variety of recreational settings, and
- produce the highest economic return to local communities from a sustained yield of timber.” (Page 64)

“Statutory mission and responsibilities”

“Considering the economic, environmental, social, and other selection factors,” the BLM cannot fulfill any one of its “statutory mission and responsibilities” through any one of its proposed tree-stand management Alternatives. All WOPR proposed Alternatives would use the same old forest management thinking and practices that did not meet what BLM mistakenly claims “Alternative 2 would do.”

The NSA achieves every one of these statutory missions; rejecting the NSA is rejecting an alternative submitted that could have met every statutory mission, and responsibilities.

Scientifically, the Preferred Alternative is the rejected NSA!

The NSA achieves every one of these issues; rejecting the NSA is rejecting the only alternative submitted that could actually address every one of these issues.

“The analysis assumes no change in climate conditions, because the specific nature of regional climate change over the next decades remains speculative.” (Page 491)

“Climate Change”

Global climate change is not speculative. Loss of forests is not speculative. Forest management being a contributor to loss of forest and climate change is not speculative. **Forest management is**

speculative, and a leading cause of the loss of forests and climate change; WOPR management Alternatives would hugely contribute to this dilemma.

Forest management

Climate change is a huge threat to forests and human survival. Every forest management EIS should evaluate the cumulative effects of individual actions on forests and climates.

The rejected NSA would contribute to restoring global climates. **The WOPR DEIS failed to evaluate the four selected management Alternatives for their adverse effects on climate change.**

The rejected NSA would contribute to restoring global climates.

Climate restoration

The NSA would not cause adverse climate change, and it is the only alternative that would contribute to restoring sustainable climates. **The NSA would restore forest climate, and cumulatively contribute to global climate restoration.**

The NSA would not cause adverse climate change, and it is the only alternative that could actually contribute to restoring sustainable climates.

Climate realities

Each peculiar species adapted to the peculiar climate where they live. If they hadn't, they wouldn't be here today. Climate change beyond a species range of adaptability, causes species extinction and more importantly loss of important functions. **Forest management practices cause climate changes that result in species extinction; why isn't this addressed in the WOPR?**

Climate change beyond a species range of adaptability, causes species extinction and more importantly loss of important functions.

Microclimates

Microclimate conditions determine which species (if any) can live in an ecosystem subset. Forest management practices have huge adverse effects on microclimates.

Human caused microclimate changes cause loss of forest species that sustain forests. **Sustainable alternatives retain microclimates; why isn't this addressed in the WOPR?**

Sustainable alternatives retain microclimates.

Cumulative effects

The cumulative effects of microclimate changes affects regional climates. Regional climate changes cause local microclimate changes. **Effects of DEIS Alternatives on climate change should have received highest levels of analysis, but they didn't; why?**

Ancient forests

Changing microclimates can cause ancient forest failures that last for at least as long as the oldest trees are old. Ancient forest restoration can only occur if all of the thousands of species that created each preceding successional ecological stage are available to change climates enough for each later successional species to survive. An EIS that disregards the effects of Alternatives on microclimates for each successional stage preceding and including ancient forest status, is not a credible EIS. A DEIS that disregards the effects of Alternatives on climate cannot be trusted. **A sustainable alternative would not cause forest microclimate changes that will result in loss of species and their functions, but all WOPR alternatives would; why isn't this addressed?**

A DEIS that disregards the effects of action alternatives on climate cannot be trusted.

Forest Management

Forest management realities

Millions of species are involved in creating and sustaining forests. Humans not only can't manage to perform the functions of any one of these species, they can't manage their own bodies sustainably. This is reality. **The WOPR Team mistakenly assumes humans can sustainably manage forests though no one has.**

Other species sustain forests

Virtually every forest management practice concept proposed in the WOPR has degraded forest biological and ecological values, and reduced tree productivity. No forest manager has managed to restore a single acre of cut down natural old late successional forest. Restoration of forests to original species conditions is only possible when all of the species that created them are still available to restore them. **The WOPR erroneously assumes that forest managers can cut down forests, "reforest" by planting trees, or convert natural forests into tree stands, and be able to sustainably meet long term timber production goals.**

Restoration of forests to original species conditions is only possible when all of the species that created them are still available to restore them.

The WOPR Team mistakenly assumes humans can sustainably manage forests though no one has.

Incorrect dominant use

Forest ecosystems consist of thousands of peculiar species performing peculiar functions to sustain peculiar subset environments, each other, and forests. Tree species are but a few of the countless species that sustain forests and humans. Forest trees, like humans, rely on countless other forest species for survival. **The**

Forest trees, like humans, rely on countless other forest species for survival.

WOPR DEIS uses incredulous tree stand plantation assumptions to frame incredulous tree stand plantation discussions and conclusions.

Natural Selection Alternative

Unlike other WOPR Alternatives, the NSA is an all-species ecosystem-centered natural-selection-based relationship approach to sustainable forest relationships and practices. The NSA is based on the premise that other species know how to create and sustain forests, and humans don't. The WOPR Team rejected the sustainable NSA in favor of management Alternatives that could not sustain forests or communities. **Why did the WOPR Team discard the only potential solution to the forest management crisis?**

The WOPR Team rejected the sustainable NSA in favor of management Alternatives that could not sustain forests or communities.

"Issues Identified / Wildland fire and fuels" (Page 21)

"How should the BLM manage federal lands to reduce the risk of wildfires and integrate fire back into the ecosystem?" (Page 21)

Forest management is a leading cause of increased forest fuel and fire hazards. Natural forests function to grow forests with large trees that have lowest fuel and fire hazard risks. Since the NSA functions to restore natural ancient forests where lowest fuel and fire hazards exist, it is obviously the best Alternative for reducing forest fire risks. **How can the WOPR Team justify selecting only Alternatives that would increase fuel and fire hazards?**

Since the NSA functions to restore natural ancient forests where lowest fuel and fire hazards exist, it is obviously the best Alternative for reducing forest fire risks.

"Alternatives Considered but Eliminated from Detailed Study" (Page 104)

"An environmental impact statement must rigorously explore and objectively evaluate all reasonable alternatives. The range of alternatives is limited by the requirement to fulfill the purpose and need, which is the reason or reasons for the agencies to be proposing action." (Page 104)

New plan, same old thinking

WOPR Alternatives are based on the same forestry tree stand management thinking that brought us to our current forest and community crisis; and that caused our current high fuel and fire hazards, biological, ecological, environmental, social and economical disasters. BLM's tree stand

BLM forest tree stand plantation management practices are not sustainable, have never been sustainable, and there is a lack of on-ground evidence to show they can be made sustainable.

Alternatives would not meet BLM's purpose and need, and it can't meet laws regarding sustainable practices. BLM forest tree stand plantation management practices are not sustainable, have never been sustainable, and there is a lack of on-ground evidence to show they can be made sustainable. **A credible DEIS would acknowledge that WOPR Alternatives are based on the same kinds of non sustainable forest management practices that caused today's forest catastrophes.**

Reasonable alternatives

The NSA uses the same basic proven sustainable relationships that other species have been using for millions of years. The NSA would retain natural forests for all their products and uses, including highest sustainable timber yields. **The WOPR Team did not rigorously explore and objectively evaluate the NSA.**

The NSA would retain natural forests for all their products and uses, including highest sustainable timber yields.

BLM's WOPR Alternatives are not science-based, but the NSA is. The WOPR Team did not rigorously explore and objectively evaluate the NSA. The NSA was not credibly analyzed, and there is no credible justification for not rigorously exploring and evaluating it.

The NSA was not credibly analyzed, and there is no credible justification for rejecting it.

The WOPR DEIS Team is obligated to explain in detail why tree-stand management assumptions were used to eliminate forest ecosystem centered alternatives such as the NSA.

"When an alternative is eliminated from detailed study, it is because it was found to be unreasonable in some way. An alternative may be found to be unreasonable when it:

1. Does not meet the purpose and need.
2. Is substantially similar to an alternative being considered in detail or it would have substantially similar effects to an alternative being considered in detail.
3. Would not be feasible or practical to implement.
4. Would be exorbitant to implement.
5. Cannot be analyzed for its effects because of its implementation being remote or speculative. (Page 104)

Elimination of alternatives

The NSA cannot be eliminated based on any one of these criteria. All of WOPR's selected Alternatives can. **The NSA is a reasonable alternative.**

The NSA cannot be eliminated based on any one of these criteria.

"Eliminated Alternatives" (Page 104)

"These alternatives, which were considered but eliminated from detailed study, were the result of proposals received from the public through the scoping process or proposed by

agency staff during the process of formulating reasonable alternatives that would meet the purpose and need." (Page 104)

Harvest Only Naturally Selected Dead and Dying Trees (Page 107)

"This alternative would remove only "naturally selected dead and dying trees, conditioned upon meeting the needs of other species." Timber harvesting of such trees would be accomplished with small equipment from a network of narrow roads." (Page 107)

This is the Natural Selection Alternative (NSA). The NSA waits until green trees have reached the end of their natural life to harvest. This hugely reduces the adverse effects of extraction on forest health, sustains long term timber yields, reduces fuel and fire hazards

providing the best in fire protection, hugely improves job security. In practice, the NSA has addressed virtually every major social and environmental issue.

In practice, the NSA addresses virtually every major social and environmental issue.

"This alternative was eliminated from detailed study because:

1. It would not meet the purpose and need, which states that the resource management plan revisions must meet all applicable laws.
2. One of the applicable laws is the O&C Act. The O&C Act requires that the O&C lands that are classified as timberlands are to be managed for permanent forest production following the principles of sustained yield, which includes determining and declaring the annual productive capacity of such lands with the timber from those lands (not less than the annual sustained yield capacity) being sold annually.
3. Also, while this management approach may be practical for managing a small woodlot on relatively flat terrain, such an approach is impractical for managing a landscape of the size and ruggedness that is managed by the BLM in western Oregon. The level of roaded access and survey efforts that would be necessary to identify and harvest the trees that die on BLM lands in western Oregon every year would be prohibitively expensive both in financial and environmental terms." (Page 107)

How to meet Purpose and Needs

The Natural Selection Alternative: 1) retains natural habitats for all of the species that create and sustain forests, the only alternative that achieves this need, 2) retains optimal forest health for optimum productivity, the only alternative that achieves this need, 3) has no

down time, the reason why it produces more timber than any WOPR managed tree stand Alternative, 4) retains and/or enhances natural visual, spiritual, historical, educational, cultural, recreational, and other more valuable non timber values, things that WOPR's forest management alternatives would not do, 5) would achieve far superior fuel and fire hazard reduction and

WOPR Alternatives don't come close to matching the NSA for sustaining forests, environments, timber, jobs, and community needs.

provide the best in forest fire protection through full time stewards that retain low fire hazard late successional forests and fire fighting capabilities; WOPR Alternatives would increase forest fire hazards and rely on people from far away places, 6) allows extraction to occur when trees have reached the dead and dying stage because this reflects what the forest can truly produce at any given point in time, not what someone mistakenly thinks it should produce as would occur with any WOPR Alternative, 7) is an appropriate, practical, universal and an economical approach from smallest to largest landscape scales, something that no WOPR Alternative would be successful at, 8) would shift from high impact and destructive logging methods to forest and community friendly permanent stewardships, providing a steady supply of predictable forest products in perpetuity; which is not a WOPR Alternative attribute, 9) would provide far better access for all products and uses WOPR Alternatives, and it would also reduce access road densities and impacts, and 10) it would hugely improve the forest ecosystem regulatory system over any WOPR Alternative. The NSA would shift away from high impact destructive tree stand management practices to forest and community friendly permanent trustees, providing a steady sustainable supply of forest products in perpetuity. WOPR Alternatives don't come close to matching the NSA for sustaining forests, environments, timber, jobs, and community needs. **The NSA is the only WOPR action alternative proposed that could truly meet BLM's forest and community purpose and need.**

Productivity

Forest productivity is relative to green plant foliage; the more green plant foliage, the more productivity. The NSA retains green trees until they die, thus retaining optimal productivity at all times. No WOPR Alternative does. **Logic should tell the WOPR Team that annual tree yield would be higher with the NSA than any green tree extraction alternative proposed simply because forest productivity is relative to green plant productivity.**

Green foliage

The NSA retains optimal green foliage across the landscape which is relative to productivity. The NSA yields far more timber simply because it has no down time in productivity like WOPR Alternatives do. Timber removed is relative to what the forest is truly capable of producing at any given point in time, not what someone thinks it might produce at some future point in time, which is never correct. **If BLM can determine timber yields from cut down forests that have enormous down time, then why can't BLM determine the yield from forests that have no down time?**

In practice, the NSA addresses virtually every major social and environmental issue.

Environment

Sustainable forests, and timber production, require retention of suitable environments for all of the species that create and sustain natural forests. BLM doesn't know how to manage for sustainable forest species environments.

The NSA is the only action alternative submitted that could sustain forest environments that would sustain their species.

No WOPR Alternatives would retain suitable environments for all of the species that create and sustain forests. The NSA is the only action alternative submitted that could sustain forest environments that would sustain their species.

Same processes

All forests function basically the same way.

All organisms have a life span and the environment determines when it will end.

Humans cannot sustainably make these death determinations, and there is no evidence to support the ideology they can. The NSA

overcomes this problem by relying on natural

selection processes to make these determinations, the same process that sustained species for billions of years. Since the NSA is natural selection based, the same principles apply to all ecosystems. Rejecting the NSA is rejecting the proven sustainable processes that created and sustained life on Earth, including humans.

Rejecting the NSA is rejecting the proven sustainable processes that created and sustained life on Earth, including humans.

Forest transportation system

Every forest extraction program requires a transportation system to serve civilization's needs. The NSA transportation system, unlike WOPR Alternatives, relies on a road system that serves all forest resource uses. The NSA transportation system retains forest species connectivity.

Forest integrity

Sustainable forests necessitate retaining suitable environments for all species that create and sustain forests, including trees.

Sustaining natural forests requires retaining suitable environments for all the species that

create and sustain them. BLM doesn't know how to manage for sustainable forest species environments. None of WOPR's Alternatives would achieve sustained yield objectives, forest or community needs. **The NSA is the only Alternative submitted that would sustain forest species and human needs, including trees.**

None of WOPR's Alternatives would achieve sustained yield objectives, forest or community needs.

Roads

I have a lot of experience with designing and constructing forest roads for the NSA. I have successfully designed and constructed roads on forest lands with a huge variety of soils, conditions and on slopes all the way from flat up to and including 120% slopes. I have built miles of roads on solid granite that required a full time crew drilling and blasting ahead of my bulldozer. I have personally designed and constructed roads in the U.S. and Canada for private forest land owners that would, if laid end to end, reach two thirds of the way across the state of Oregon. **How can the WOPR Team claim "the level of roaded access and survey efforts that would be necessary to identify and harvest the trees that die on BLM lands in western Oregon every year would be prohibitively expensive both in financial and environmental terms" when these roads proved to be the least expensive, most environmentally friendly, and only affordable road system for the forest land owners I worked for?**

Surveys

If BLM means cost of surveys to identify dead trees, there is virtually no cost. Trustees simply drive around, locate them, cut them down, load them onto a forwarder of some kind, and deliver them. No one from BLM needs to survey for dead trees. **Once again, no credible BLM analysis, no credible BLM conclusion.**

Incorrect WOPR assumptions

There simply is no credible data to support BLM's rejection of the NSA. The WOPR Team states: 1) NSA did not declare **"annual productive capacity"**. It was clearly stated in the NSA that naturally selected dead and dying trees would be removed, conditional upon meeting the needs of other species; it is up to BLM to determine these numbers. 2) BLM incorrectly states **"Oregon's forest land ruggedness"** makes NSA "impractical." Again there is no data to support this contention. 3) BLM incorrectly states the **"level of roaded access and survey efforts"** would be **"prohibitively expensive"**, even though these roads have cost far less to survey and construct for private owners. The BLM Medford District analysis showed that the NSA needed less square foot displacement for roads that achieved far more than current BLM practices. **None of the WOPR Team's reasons for rejecting the NSA are correct.**

None of WOPR's reasons for rejecting the NSA are correct.

The NSA fulfilled the purpose and need for the BLM Medford District South Deer Project; does the WOPR have a different purpose and need, and if so what?

Rejecting the NSA is arbitrary and capricious.

"Environmental Consequences / Introduction" (Page 475)

"Keep in mind that this draft environmental impact statement describes the generalized management-level actions and not the site-specific implementation-level actions." (Page 475)

Each action should be looked at from a cumulative basis. Individual action analysis is essential for arriving at cumulative effects analysis. Ignoring "site-specific implementation level actions," is ignoring the cumulative "generalized management level actions," and sustainability. The NSA, is the only Alternative with built-in criteria for analyzing individual actions for cumulative natural selection outcomes. **WOPR DEIS Alternatives fail to analyze the cumulative effects of individual actions.**

The NSA, is the only Alternative with built-in criteria for analyzing individual actions for cumulative natural selection outcomes.

"Ecology" (Page 192)

"This section of Chapter 3 analyzes the ecological condition of conifer forests. Forest stands can be described by their structure, composition, and function. This analysis will

focus on forest structure, because structure is the most easily analyzed, responds most predictably and apparently to management actions, and is closely related to many of the issues for analysis." (Page 192)

Ecology is the division of biology that deals with relationships and interactions between organisms and their environment. Focusing on the ecological condition of conifer forest stand structures, omits analysis of the far more important ecosystem ecological regulatory system. **How does WOPR DEIS focusing on forest stand structure address the needs of the regulatory ecosystem ecology?**

Focusing on the ecological condition of conifer forest stand structures, omits analysis of the far more important ecosystem ecological regulatory system.

Management assumptions

People in civilization-cultures are forced to rely on managers. People are taught that managers know how to manage forests sustainably, but there's no evidence to show they do. **Incorrectly assuming that**

managers know how to manage forests sustainably, allows them to control discussions and outcomes, and that is what the WOPR Team is attempting to do.

People are taught that managers know how to manage forests sustainably, but there's no evidence to show they do.

The NSA relies on the only time tested and proven ecological system of relationships. The NSA relies on other species to perform functions essential to sustaining forest ecosystem ecological health, not humans.

WOPR DEIS Alternatives would manage to override natural processes, a relationship concept well proven to cause forest ecological failures.

The NSA relies on other species to perform functions essential to sustaining forest ecosystem ecological health, not humans.

"Interim Off-Highway Vehicle Management Guidelines" (Page 1191)

Concentrated off-highway vehicle (OHV) usage is not compatible with the checkerboard of public and private land ownership in the proposed "Illinois Valley and Elliott Creek

Empahsis Areas." The WOPR lacks criteria in the DEIS for establishing Off Highway Vehicle (OHV) use. **Why did the WOPR create special Off-Highway Vehicle (OHV) Emphasis designations without meeting required criteria?**

The NSA doesn't allow tree stand management or ORVs.

Public forest vehicles

BLM's OHV designation confuses people. We think that what BLM is talking about, or should be talking about, is what kind of vehicles should be using public forests, and where. We're talking about all vehicles used in public forests, Public Forest Vehicles (PFV). PFVs are

necessary for civilization to be able to access the many uses that forests have to offer, but many of them have major conflicts with other uses and users.

NSA policies

The NSA promotes forest uses that: 1) protect and preserve natural forest resources, 2) retain the safety of all users, and 3) have minimal conflicts among users. Forest uses not permitted under the NSA include: No vehicles incompatible with other uses, and no vehicles

or heavy equipment off approved roads. NSA's special Contour Concentric Looping Access System (CCLAS) is a huge attribute to optimizing forest use and user diversity with minimal conflicts.

NSA's special Contour Concentric Looping Access System (CCLAS) is a huge attribute to optimizing forest use and user diversity.

South Deer Project

The community supported the NSA for the 7,400 acre BLM South Deer Project in Josephine County to accommodate as many forest user and uses as practical. Forest diversity and community economy is a huge motive. Five hundred acres has already been awarded for this project and the community is eagerly working to obtain the remaining requested part of this project. The designation of this area as an "OHV Emphasis Area," hugely conflicts with the community's long term vision for other uses.

Forest trustees

The NSA South Deer Project would have on-ground trustees to oversee resource extraction, uses, and users. Tours and seminars would be conducted to educate visitors about how forests function. A NSA research project is to

be part of this project, and the Siskiyou Field Institute headquarters is nearby to conduct it. Recreation is expected to be a major attraction. The NSA requires that vehicles, and their uses, be compatible with all other forest uses and users. **Collaboration, a directive under the Northwest Forest Plan, is being overridden by the WOPR DEIS Team through designation of the South Deer Project as an "OHV High Emphasis Area." Why?**

The NSA requires that vehicles, and their uses, be compatible with all other forest uses and users.

The Preferred Failure

The WOPR DEIS calls it the Preferred Alternative. The Preferred Alternative would not provide a sustainable supply of wood and other forest products as mandated by the O&C Act, or meet the requirements of other applicable laws. The Preferred Alternative would, as in the past, continue to degrade forest ecosystems that would or could conserve species that are listed under the Endangered Species Act. It also would not, as in the past, contribute toward meeting the goals of the Clean Water Act and the Safe Drinking Water Act; reduce the risk of wildfires, or integrate fire back into the ecosystem in a biological, ecological or scientifically responsible way; or provide for off-highway vehicle management to meet that demand while protecting other resources. **The WOPR Preferred Alternative is a classic management failure.**

The WOPR DEIS Team failed to fairly evaluate the proposed NSA which would meet the purpose and need and provide for and meet all of the above issues. **The WOPR Team has an obligation to reconsider the NSA.**

Accountability

Lack of accountability

Accountability is essential to sustaining forests. If we're going to survive as a species, we must achieve accountability. Government officials must be held accountable for causing forest destruction just like the rest of us. Lack of accountability in government is destroying our forests and communities.

Our two-class system

The lack of official accountability is largely due to our two-class culture. Our two-class culture incorrectly assumes the upper class knows how to sustainably manage forests and communities. The lower managed class hasn't been smart enough to recognize the upper class can't manage much of anything sustainably. Together, the manager and managed classes are destroying the forests that sustain all of us. **Why are the managed required to have credentials for what they do, whereas WOPR Team officials aren't? Why are government officials exempt from accountability? Why are government officials rewarded for destroying our forests while the rest of us are severely prosecuted for relatively minor violations?**

Together, the manager and managed classes are destroying the forests that sustain all of us.

The NSA provides a solution to our dysfunctional two-class cultural system. **Is there anyone smart and powerful enough to change this dysfunctional two-class prescription for human extinction?**

The NSA provides a solution to our dysfunctional two-class system.

"Coordination and Monitoring" / Public Collaboration (Pages 821-848)

Sustainable forest management practices require monitoring of the species that create and sustain forests. There would be no credible monitoring of forest ecosystem subsets under any WOPR Alternative. **The WOPR rejected NSA would monitor ecosystem subsets.**

There would be no monitoring of forest ecosystem subsets to assure that they remain viable communities.

"Ecology / Structural Stage Classification" (Page B-939)

Forests, ecosystem subsets of the biosphere, have countless smaller ecosystem subset communities that sustain the larger forest ecosystem. Micro subsets must be evaluated cumulatively as they are part of the larger

The NSA, by design, addresses each and every forest ecosystem subset, but the WOPR DEIS does not.

forest ecosystem subset. The NSA, by design, addresses each and every forest ecosystem subset, but the WOPR DEIS Alternatives do not. **The WOPR DEIS Alternatives are not ecologically credible.**

“Settlement Agreement” (Page A-929)

“Under the settlement agreement, the BLM agreed to revise its resource management plans in western Oregon and in that revision the BLM would consider an alternative that would not create any reserves on the O&C lands, except those reserves required to avoid jeopardy to species listed as threatened or endangered under the Endangered Species Act.” (Page A-929)

The environment determines whether or not a species can survive in its community. All of WOPR’s Alternatives would cause ecosystem subset environmental changes that would prevent species from surviving in them; the NSA would not. The NSA is the only

The NSA is the only submitted alternative that could “avoid jeopardy to species listed as endangered under the Endangered Species Act.”

Alternative designed to retain forest micro ecosystems subsets across the landscape. The NSA is the only submitted alternative that could “avoid jeopardy to species listed as endangered under the Endangered Species Act.” **All of the WOPR DEIS Alternatives would increase the “jeopardy to species listed as threatened or endangered under the Endangered Species Act.”**

Most of the species associated with natural ancient forests are in some kind of endangerment due to elimination of their habitats. These endangerments are almost always due to tree stand management. A BLM settlement agreement that would eliminate “any reserves on the O&C lands, except those reserves required to avoid jeopardy to species listed as threatened or endangered under the Endangered Species Act,” and then try to and eliminate the Endangered Species Act, demonstrates complete BLM and timber industry incompetence.

Public Awareness

Secret agendas

The WOPR is potentially the most catastrophic forest plan we’ve faced for protecting public forests and community health. Most people have no idea of what the WOPR is, many have never heard of it. Neither the timber industry or environmental community seem to have a good understanding of what the outcome of the WOPR could be. WOPR Alternatives would be devastating to private natural forests. Few people are aware of the potential irrevocable catastrophic forest and community consequences the WOPR would likely bring about if it becomes law.

Almost no one is aware of the potential irrevocable catastrophic forest and community consequences WOPR could bring about if it becomes law.

“Having an Impact on the Decisions” (WOPR Newsletter 7)

“Now that we know the expected impacts of the various alternatives, we’ve identified some areas where your comments and ideas could be most helpful in developing the revised resource management plans:

- How can we increase the fire resiliency of the forests in the Medford District and the Klamath Falls Resource Area of the Lakeview District?**
- How can we better manage the harvestable land base in such a way that will increase the rate of recovery of the northern spotted owl and the marbled murrelet in the short term, while still providing a consistent and stable timber supply?**
- How can we speed the redevelopment of structurally complex forests after regeneration timber harvesting?**
- What management techniques might we use to lessen the effects to special status species?”**

The best way to increase long term fire resiliency of forests is leave them alone. The rejected NSA, is the best way to increase the rate of recovery of the northern spotted owl, etc. while providing a consistent, stable and sustainable supply of timber. There should never be “regeneration timber harvesting.” No one can manage for the kinds of forest structure that other species need to sustain themselves and forests, and no one should bother trying. The best management techniques is to keep people from trying to manage forests. I haven’t managed forests for forty years and no one has managed a forest that equals these forests. I have no forest management costs, which unlike managers is how I stay in the forest business.

“As you share your interests and suggestions with us, your comments will be most useful to us if they address one or more of the following:

- Errors in our analysis .**
- New or missing information that would have a bearing on the analysis.**
- Suggestions of a new alternative or management principles that address the purpose and need of the plan revisions and meet all the statutory requirements applicable to the lands managed by the BLM in western Oregon. An example would be an alternative composed of parts of the other alternatives analyzed in the EIS.”**

I’ve volunteered to write about numerous errors in your analysis, but so far no one seems to be paying any attention. The problem is, each of you have your strong points and agendas, but you don’t seem to want to listen to the areas you have no expertise in. Politics seems to rule over science and that is potentially catastrophic. Like I said before, the already submitted NSA would address virtually every major social and environmental issue, but like before you’ll probably continue to reject it, and for political reasons.

We’re living in fantasy land. Incompetent politicians are selecting incompetent managers to do incompetent things and they all lie about everything. The rapidly growing political spin on

information makes it increasingly difficult to grasp whether information is truth or lies. We need truth to achieve sustainable solutions, but constant lying is preventing it.

There is enormous disparity between those who got paid to write this huge incredulous WOPR advertisement, and those of us who pay the salaries of those who wrote it, and the enormous cost to those of us who take the time to try and provide credible information. The disparity between those who wrote the WOPR and those who have to respond for their own survival, is not sustainable. What is the true cost of this WOPR, and why isn't that a part of the DEIS?.

Cumulatively, WOPR type assumptions are prescriptions for government and cultural failure, and we're witnessing this in every walk of life, on a rapidly escalating scale.

Conclusions

My family still owns the forest land where I was born (long before the chainsaw was invented). We live on the nearby land that my great grandparents homesteaded in 1912, now known as Camp Forest. Never in my entire lifetime of living and working in forests have I figured a way to sustain a forest using management techniques proposed in WOPR Alternatives, nor have I met anyone else that has either.

Through observations, and understanding how other species create and sustain forests, I've figured how to have sustainable relationships with them. It's easy to have sustainable relationships with forests, all you have to do is understand how other species function sustainably, and then let them do it. The main obstacle to sustainable forest relationships comes from civilization culture created political and legal ecological obstructions, such as a WOPR Alternative.

Civilization cultures have been destroying forests that sustain them for thousands of years. I questioned why so many people in civilization cultures would rather die for it than change their ways. Eventually I came to the realization that civilization culture's ecology causes it to self destruct, and I've identified twenty ecological reasons in my new book as to why its not sustainable. The solution to civilization's non sustainable ecological functions, lies in overcoming civilization's self perpetuating political and legal obstructions.

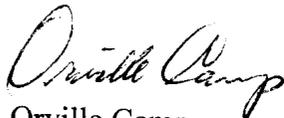
The NSA is an attempt to overcome civilization culture's non sustainable ecological functions. NSA concepts began on the ground at Camp Forest in 1967, it has been toured by people from many countries. Camp Forest has become a model for how to overcome civilization's ecological function problems, it's a story that needs telling.

Camp Forest demonstrates that the NSA is ecologically far superior to WOPR Alternatives. But few "officials" in civilization cultures think outside the box they're in, and the WOPR Teams rejection of the NSA without credible evaluation demonstrates this.

I am deeply concerned about the irrevocable damages WOPR Alternatives would cause to Oregon's forests and Camp Forest. My family's survival depends on Camp Forest. Camp Forest can't survive without the species that create and sustain it. WOPR Alternatives would destroy nearby forests, species, functions and environments that Camp Forest species depend on. The loss of Camp Forest would deprive my family and the world of a valuable model for how to achieve a sustainable ecological solution. Camp Forest is an incredibly important story that WOPR Alternatives would destroy.

Normally when all action alternatives are rejected there is the option of requesting a No Action Alternative. Since this No Action Alternative is actually an action alternative disguised as a No Action Alternative, we request the WOPR be abandoned.

Deeply concerned,


Orville Camp

CC:

Tim Reuwsaat Medford District Office 3040 Biddle Road Medford, OR 97504	Senator Gordon Smith 121 SW Salmon St. #1250, Portland, OR 97204 Email: www.gsmith.senate.gov	Senator Ron Wyden 1220 SW Third Ave. #585 Portland, OR 97204 Email: www.wyden.senate.gov
Rep. Peter DeFazio 405 E Eighth Ave. #2030 Eugene, OR 97401 Email: www.defazio.house.gov	Governor Ted Kulongoski State Capitol, Room 250 Salem, OR 97310	Board of County Commissioners Josephine County Courthouse 500 NW Sixth Street, Dept. 6 Grants Pass, OR 97526