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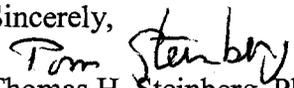
To the Bureau of Land Management:

The Western Oregon Plan Revisions (WOPR) proposal presents 4 action plans ('alternatives') that must be evaluated under the requirements of several federal laws, including the O & C Act and the Endangered Species Act. Under the aegis of economic development, the BLM literature states a preference for Alternative 2, stating that this plan provides the best economic consequences while meeting the requirements of other federal legislation. But the economic argument relies on the simple assumption that the major value of the O & C lands resides in the volume of timber that is taken. Continuing timber and sustainable production from O & C lands should be a revenue source, and it must be evaluated in the context of current and anticipated trends.

A fundamental flaw in Alternative 2 and, to a lesser extent in alternatives 3 and 4, is that the intrinsic value of standing ancient (.200 years) forests is grossly underestimated. This unfortunate error has two major sources: (1) it's not easy to place a "dollar value" on these unique, complex assemblages of flora, fauna, soil, and water; (2) until very recently -- within the last 100 years -- the Old Growth forests were widespread and were a primary source of timber. Times have changed, and we must adjust to the reality that the old, intact ecosystems are becoming rare and fragmented and thus more valuable as intact entities than as sources of timber which can be obtained from the vast plantations that have already replaced the old forests.

It's also clear, on the basis of peer review of, among other things, the Spotted Owl recovery proposals, that the "science-based" arguments and conclusions of the BLM draft proposals are almost certainly not sound. Further, it doesn't appear that there is any depth of thought in proposals that rely on such assumptions that climate conditions will be static (p 491). Any scientist or citizen who is well informed regarding the current -- and almost certainly future -- anthropogenic Global Warming phenomena must be skeptical of a draft study that makes such staggeringly unrealistic assumption and ignores the realities of the 21st century.

I want to remind BLM that the "no action" alternative is in fact an action plan. The Northwest Forest Plan was written for valid reasons after careful consideration. The BLM's "re-focusing goals for sustained yield management" will do more economic harm than good in the long run by shortsightedly ignoring negative ecological impacts of the 3 alternative plans". The current low timber yields are the consequence of reckless over-harvesting in previous decades. It will be best to take the medicine of low timber yields for a while than to extend previous folly.

Sincerely,

Thomas H. Steinberg, Ph.D.