

DEAR BLM:

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RON SADLER'S ARTICLE BEST CONVEYS MY

JAN 11 2008

SENSE OF THE WORK.

IT BECOMES INCREASINGLY IMPORTANT TO
RESTORE THE NATURAL ENVIRONMENT AND TO FIND
THE FLEXIBILITY WITHIN OUR ECONOMIC SYSTEM
TO ACCOMMODATE SUSTAINABILITY AND PROSPERITY.
THANK YOU.

SINCERELY,

John White

OPINION

GUEST VIEWPOINT

BLM timberlands draft is a failure

By RON SADLER

The draft environmental impact statement for the revision of resource management plans governing Bureau of Land Management lands in Western Oregon is out for public review. It comes in three volumes, and weighs almost 10 pounds.

Given the wealth of data and analytical tools available, as well as lessons learned over the past decade operating under the Northwest Forest Plan, the BLM's draft statement could be and should be a paragon of logic and compliance with the intent of the National Environmental Policy Act.

It is not.

A review of the draft leaves one with the distinct impression that the BLM has carefully narrowed the description of the purpose and need for the plan revision in an attempt to justify limiting the subsequent consideration of alternatives to an extremely small range of options, all of which are variations on a prescribed theme.

The BLM states that the purpose and need for a land use plan revision is to find a way to "conserve habitat needed from these lands for the survival and recovery of species currently listed as threatened or endangered under the Endangered Species Act."

For more than 20 years, the BLM has been attempting to integrate the requirements of the Endangered Species Act with the timber-oriented O&C Act of 1937, which relates to Western Oregon lands once owned by the Oregon & California Railroad that are now managed by the BLM.

It has attempted to do this by considering only the needs of those species formally listed as threatened or endangered.

The BLM has failed to learn the futility of this minimal and piecemeal approach, even though the abject failure to maintain timber production under the Northwest Forest Plan is ample evidence of its inadequacy.

The BLM refuses to recognize that the scarce resource is not spotted owls, marbled murrelets or any of the other 300-plus plants and animals associated with old growth timber that are awaiting their turn to jam the timber production machinery. The scarce resource is the old growth ecosystem itself.

The real need is for the BLM to:

- ◆ Recognize the scarce nature of functioning old growth stands across all ownerships within Western Oregon.

- ◆ Determine the role to be played by the remaining remnants of old

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growth on BLM lands in order to meet the primary purpose of the Endangered Species Act, which is the conservation of the ecosystem upon which endangered species depend.

- ◆ Seek ways to integrate the ecosystem requirements of the Endangered Species Act within the timber production mandate of the O&C Act.

Once the purpose and need for a plan revision is correctly and properly described, the BLM could then move on to develop a comprehensive and realistic range of alternative ways to serve the stated purpose and meet the identified need. That need then could be analyzed in full accordance with the letter and intent of the National Environmental Policy Act, the 1969 law that created the environmental impact statement process.

Although the act states that an environmental impact statement even for "proposals of unusual scope or complexity shall normally be less than 300

pages," the BLM is offering the public 1,606 pages. Those who don't have the time or inclination to review all of those pages can at least let the BLM know they expect a legitimate, comprehensive and professional planning effort, not a narrowly focused, truncated attempt at justification of a pre-conceived idea. The agency will accept public comments until Jan. 11.

Only a planning effort that effectively addresses the role that BLM lands realistically can and should play in maintaining a viable distribution of the old growth ecosystem across all ownerships throughout Western Oregon has any hope of maintaining a predictable and uninterrupted flow of timber from the O&C lands.

Unless substantive changes are made between BLM's draft and final environmental impact statements, we can expect yet another decade of continuing lawsuits, appeals and protests.

Ron Sadler of Coast Bay is a retired chief of forestry planning for the Bureau of Land Management. In that capacity, he worked to implement the National Environmental Policy Act and testified as an expert court witness on lawsuits involving those act.