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Bureau of Land Management
Western Oregon Plan Revisions Office
333 SW 1st. Avenue, Portland, OR 97208

RECEIVED
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Re: BLM Western Oregon Plan Revisions

As a resident of the Applegate Valley in Jackson County, I have studied the WOPR draft EIS. The more I examine the proposal the greater are my concerns. The changes put forth in the WOPR will negate the protections gained by the NWFP and will lead to degraded habitat and water pollution, exacerbate fire hazard, and increase conflict and controversy leading to unnecessary legal confrontations. The BLM should move past trying to justify land management based on a 70 year old law and practices rejected by a majority of citizens. BLM should be the leader in developing a plan that utilizes the best available science and forestry practices to manage the forest responsibly. Over the past decade, the community and timber industry have been coming together around plans to do extensive thinning in our Northwest forests, especially in areas managed as tree plantations. This is the kind of forest management that is needed where consensus and compromise are the result.

Please address the following issues in your proposal:

- Relying on studies from 2001 and 2004, the WOPR fails to assess the effects of climate change because "the nature of regional climate change over the decades remains speculative"(page 491). This is a gross distortion of current scientific concensus and certainly makes a mockery of using the best available science. How can you justify ignoring such a significant issue other than that it inconveniently conflicts with the ability to harvest at the levels you propose? Furthermore, how do you justify ignoring a 2001 order from the Secretary of the Interior which states:

  > "Each bureau and office of the Department will consider and analyze potential climate change impacts when undertaking long range planning exercises, when setting priorities for scientific research and investigations when developing multi-year management plans and/or when making major decisions regarding the potential utilization of resources under the Departments purview"

- In an area related to the above point, the WOPR states the acreage of stands with a high fire hazard is significantly increased across all districts over the No Action Alternative. In addition, the management plan fails to reflect the fact that there is higher fire risk in the Medford District than elsewhere in the planning area. The BLM to should focus to a greater extent on linking timber harvest to the reduction of fire risk with the goal of improving the fire resiliency and health of the forest. How can the WOPR justify actions that would significantly increase risk to forest lands and adjacent private property?

- A key underpinning of the BLM plan for western Oregon is a new Spotted Owl Recovery plan that has been shown to be heavily politicized and deemed scientifically unsound many experts. In October, 113 scientists wrote to Interior Secretary Dirk Kempthorne urging him to rescind the owl recovery plan. How can your proposals conform to the Endangered Species Act without this bogus justification?

- The WOPR analysis reports that across all districts the acreage of stands with a high fire hazard will be significantly increased over the No Action Alternative.The management plan also fails to reflect that there is higher fire risk in the Medford District than elsewhere in the planning area. The BLM to should focus to a greater extent on linking timber

harvest to the reduction of fire risk with the goal of improving the fire resiliency of the forest. How can the WOPR justify actions that would significantly increase risk to forest lands and adjacent private property?

- Consideration of the visual resource management (VRM) aspects of the NWFP has been eliminated. The BLM has previously justified such actions based on an interpretation of the O & C Act allowing timber production as the "primary use" for these lands. Complete lack of evaluation of the VRM appears to be interpreting timber production as "sole use" rather than primary use. Was the elimination of the visual resource management (VRM) aspects of the NWFP evaluated for social and economic impact and how will that affect tourism and property values?

- WOPR proposes reducing riparian reserves from 100 feet to 25 feet. This is well below scientifically recognized stream-buffer widths for minimizing impacts and problems with landslides, floods and fisheries. According to David Powers of the EPA, recent surveys have shown that from 1998 to 2003, under the Northwest Forest Plan, 57% of watersheds were improved , 40% were stable and only 3% worsened. What justification do you have that the reduction of reserves will not jeopardize these gains and lead to problems with the Clean Water Act?

The BLM has selected alternative 2 as its preferred choice. Even allowing for the ability to select some combination of actions from the 3 alternatives, it is my belief and recommendation that the only reasonable choice now on the table is the no action alternative. If BLM is not satisfied with remaining with the status quo, I encourage the BLM to adopt a complete revision of the alternatives, following the best available science rather than forcing actions based on 70 year old laws to justify poor and destructive practices, and offer a plan that recognizes that differences in soil and climate of the Medford district.

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