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765 Mesa Verde Drive  
Cave Junction, OR 97523  
January 11, 2008

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

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To Whom It May Concern:

The Western Oregon Plan Revisions fail to meet compliance with the following standards. These criteria are followed by comments on ethics and sustainability issues involving the potential implementation of WOPR.

**Process:**

The BLM is violating the National Environmental Policy Act (NEPA) by not implementing Section 102(2) (A) B Interdisciplinary Process. This states "...All agencies of the Federal Government shall utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and social sciences and the environmental design arts in planning and in decision making which may have an impact on the human environment." If this requirement is not met, the WOPR will not be in compliance with these standards and applicable criteria and will be illegal.

If BLM is to revise the current multiple resource management plans for Southern Oregon, with a single overlay plan, the Western Oregon Plan Revisions (WOPR), and a single EIS, they must utilize a regionally experienced interdisciplinary team that is capable of interpreting and integrating the needs of locally forested zones. Although many of the processes and standards for this single plan may be identical, the people, the issues, and the micro-ecologies of this region are unique. The allocation of specific prescriptions for thousands of acres throughout Southern Oregon should be accomplished by interdisciplinary teams and local managers who are knowledgeable about these specific resources and issues – not by some distant bureaucrat issuing blanket rules and regulations. NEPA, by law, must be shown compliant with the standards of its authority over actions by the BLM.

**Fire Hazard and Regrowth:**

It's been well documented that areas of clear-cuts produce an extreme fire danger, not a reduced danger. Clear cuts do not regenerate trees, but highly flammable buck-brush as is evidenced by the BLM property next to our housing development. This clear cut is already putting our housing development at risk. As neighbors of BLM, we are already suffering from poor management decisions.

**Off-Highway Vehicles:**

These designations invariably degenerate into wastelands in which riders first widen trails, then ignore trails entirely in favor of more exciting / challenging experiences, trespassing, interfering with pedestrians and equestrians and other erosion-causing antics. We would be pleased to guide you to botanically sensitive areas in our valley which have been completely ruined in this way.

**Summary:**

The proposed Western Oregon Plan Revisions generated by back-room politics in Washington, DC is the most destructive and unsustainable way to proceed with our public lands. Obviously, in light of years of consistent and continual mismanagement of our public lands, the BLM needs to be removed from this process. The Forest Service has provided slightly better oversight.

Tying police protection, county payments, road maintenance and children's education to clear-cuts is unconscionable. **Our economically distressed region would lose our single remaining industry – tourism – for a short-term gain of a few months for a handful of fat cats.**

The WOPR is unacceptable in every sense. Throw it out and start again.

Sincerely,

  
Judy Hoyle