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Edward Shepard
Oregon State Director
Bureau of Land Management
P.O. BOX 2965
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Dear Mr. Shepard:

First of all I would like to thank you and your staff for your time and effort putting together the Western Oregon Plan Revision (WOPR). As a forester I understand and appreciate the scope of your task. Overall I think you have done careful analysis and have juggled numerous influencing factors well.

I may be one of the few who have actually read the entire three volumes and nearly all of the 1600+ pages of the Draft Environmental Impact Statement (DEIS). I have also attended numerous presentations on the WOPR as well as a field tour that the Coos Bay District in coordination with the Bay Area Chamber of Commerce put on September 13, 2007. **Overall, I endorse Alternative 2 as the preferred alternative and will support any plan that has at its core the intention to actively manage our federal forestland.**

The following comments are provided as my input into the WOPR EIS process.

It's important to remember and state up front that the O&C lands are not "typical" federal property to be managed like our National Forests and National Parks. When the federal government was granted management authority of these revested O&C lands, the act specifically spelled out that *"timber shall be sold, cut, and removed...for the purpose of providing a permanent source of timber supply..."* This revenue is important to the local economies due to the high percentage of federal ownership within many Oregon counties. Since this land is off the tax rolls, all federal timberland and especially the O&C lands should be paying their fair share back to the counties. Alternative 2 will allow the BLM to do this without subsidies from the Federal Treasury. I think that harvesting half of the annual growth more than balances the timber production and watershed/wildlife protection requirements of the act. **I also think that more emphasis should be put on the fact that these lands are growing approximately 1.2 billion board feet per year and we will only be harvesting 727 million board feet per year under Alternative 2, just more than half of the annual growth.** Anyone who understands compound interest will see what will happen to these forests, these forests will be growing and not being decimated like some interest groups would like the public to believe. Adding a graph of total volume on these lands over time may be a good way to show this.

Riparian areas are another area of concern for me. As a forester who must follow the Oregon Forest Practices Act (OFPA) with strict RMA rules, I feel that the plan under Alternative 2 is more than generous. **I believe that the OFPA requirements for streams, lakes, and wetlands should be adopted into your WOPR EIS.** This would protect fish bearing streams with buffers from 50-100 feet on each side, which would provide adequate large woody debris and shade. RMAs that extend beyond one tree height from the high water mark are not providing these benefits to the stream; they will provide secondary and tertiary benefits to the ecosystem, but not directly to the stream. **Additionally, RMA widths should be set distances and not tied to canopy closure and effective shade.** These measurements are not required under the OFPA and will just increase the cost of harvest layout, reducing revenues back to the O&C counties.

Since this plan designates over 50% of the land base for uses other than timber production, **I feel that you must match up all known Northern Spotted Owl (NSO) and Marbled Murrelet (MM) Critical Habitat Units with Late Successional Management Areas (LSMA).** Because the purpose of these LSMAs are principally to restore NSO and MM numbers, the WOPR and the recovery plans for each species should match up exactly. Additionally, language should be in the plan in case one or both of these species is taken off the Endangered Species List. Some forethought on this issue will save headaches later if this should ever happen. **Taking land out of timber production for a species that is no longer endangered does not make sense to me.**

One subject that I do not think Alternative 2 addresses adequately is green tree retention. Again I feel that the OFPA addresses this issue well. For every acre harvested, two green trees must be retained somewhere within the harvest unit boundaries. These leave trees can be clumped or scattered throughout the unit. **Alternative 2 should be revised to include some green tree retention** not to exceed 5 trees per acre that can be clumped within the unit boundaries.

Another concern of mine is salvage of dead trees. Because this land is to be managed for timber production, **all opportunities to commercially salvage dead and/or dying timber should be "fast tracked" through the planning process and value should be extracted.** Stand replacement disturbances should be defined as wildfire, insect, and windthrow events. The timber should be salvaged and that revenue should be used to replant and restore the damaged area. It's a win-win situation. Timber is harvested, our forests are replanted, trees will return rather than brush and weeds, and fire fighting costs can be offset, all without undue financial burden on the taxpayers. Additionally, the language on page 33 that requires *"aggressive initial attack"* is great. By aggressively attacking wildfire, we can reduce the size of the fires and the associated costs both economically and ecologically.

Chief among my concerns is the possibility of **collaborating government agencies** specifically, National Marine Fisheries Service, US Fish and Wildlife Service, US Environmental Protection Agency, and the Oregon Department of Environmental Quality, **reopening negotiations/filing a lawsuit after a final EIS is submitted and wanting further protections/set asides.** Since these agencies have been involved from the beginning of this planning process, I feel that time for them to provide input into the plan is now, and not after a final document has been created. Because all interested parties have negotiated the details in good faith to a compromise in the middle, any action after the fact by a government agency will lead to a final document that is skewed in to the benefit of that agency and not all collaborating parties. If there is any way to prevent this type of "reopening of negotiations" after the fact, it should be incorporated into the WOPR EIS.

Thank you for allowing my input into the WOPR planning process.

Sincerely,
Jeff Bunnell

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