Clippings Attached

2645.1

RECEIVED

JAN 11 2008

6125 SW Alosch Rd
Portland, Or 97239
10 January 2008

Edward W. Shepard
State Director
Bureau of Land Management

Re:- Draft EIS for Revision of Management Plans of W. OR BLM Districts

Dear Mr. Shepard-

I am submitting brief comments at the next-to-last-day because I really didn't want to. The sight of the developed Alternatives made me feel upset and sick. I have spent most of my adult life in Oregon, a foot soldier in the fight to save the old growth forest. It is now down to 15% of the forest. The painful compromises of 1993 in developing the Northwest Forest Plan and the long legal struggles weren't the end- Here we are again, chipping, chipping. chipping away at what is left of a precious irreplaceable resource.

A Federal judge ruled the the NWFP was barely adequate, yet your team proposes to cut the o.g. reserves leaving from 57% to 75% standing. Of course the impacts of entry + salvage are minimized

In the last few months, several events have suggested to me that you modify your choice or even scrap the entire project — in spite of the time and great cost that have been invested in it -

- The entire Dept of Interior is under a cloud as the full extent of the pressures to falsify scientific studies is being uncovered. As your study relies on USFWS studies, they are now suspect. The one plan and the salmon plan are before judges who are plainly furious with the agency.

• The n-spotted owl is declining rapidly. It won't do to blame the barred owl because the barred owl thrives on edge habitat and the more you reduce o.g and the more you open it up, the greater the threat to the owl, the more likely are violations of E.S.A and the more likely law suits.

• Your DEIS proposes a purely experimental management technique — thinning + forcing growth to imitate older forest characteristics. The State of Oregon is following such experimental techniques in the Tillamook + Clatsop Forests. They stupidly have put the groves which remained through the Burns on the cutting plan — There are to be no "control groups" for the experiments and no older trees that are naturally adapted to their sites

Why would you wish to emulate ODOF? you have the chance to maintain the o.g. reserves thereby providing the "control group" for the ODOF "experiment".

In the halcyon days of FLPMA (1976) the old growth groves were seen by the biologists as "stepping" stones and wildlife corridors. When you write about allowing trees to become o.g. I have to laugh a bitter laugh — promises promises, who'll be here to check up on you? What do the plants + animals do in the meantime?

• We are now in a housing slump. Economists think it is going to get worse and not be brief. Therefore, there isn't a great demand for the wood. The mills are now adapted to smaller logs. What

BLM. DEIS. W. OR RMP. Revision

is to be done with the old trees? Ship them to Japan? Make paper out of them? They are much more valuable standing as trees.

I have followed these controversies since the early 1970's as an amateur. I persuaded the supervisor of the Willamette N.F and the Eugene District BLM to sponsor a conference on old growth that stimulated interest among citizens. Because I read timber sales at the Eugene District BLM office when only buyers did, I was appointed to the Advisory Board. I have been watching BLM for over thirty years. It's always been difficult to get the right balance in the planning, but never so bad as now with the Bush Administration's relentlessly undercutting all environmental laws, policies + regulations + budgets. But the nightmare will soon end. Meanwhile, it is imperative that BLM stall off on this most unfortunate plan. The only real option is the NO ACTION, Northwest Forest Plan, because it barely meets the minimum legal requirements.

I apologize for submitting hand-written comments. Thank you for encouraging participation. Your mailings that appeared at intervals after release of the DEIS were well constructed + attractive, as is your Website on the subject. You have made a real effort to reach out, so I am succumbing / overcoming my distress at confronting these Alternatives. Please stand up to the pressure! Go for the NO ACTION in the FEIS.

Sincerely

P. Sydney Herbert

P. SYDNEY HERBERT