

Dear OR/WA State Director Shepard:

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Please accept the following comments on the BLM's DEIS for the Revision of the Resource Management Plans for Western Oregon:

- None of the three alternatives presented in the DEIS meet the requirements of the O&C Act because they do not manage the land for the dominant use of timber production. Reserving the majority (52%) of the suitable timberlands for the purpose of a listed species is contrary to the O&C Act.
- Because of the unique nature of these lands, by law they are not available to be part of a reserve system designed to recover a listed species. The BLM should consider active management for the protection of all species and their habitat before adopting reserve strategies. The final plan should be one that will not jeopardize the continued existence of listed species.
- The BLM must develop and analyze at least one alternative that maximizes the amount of land in timber production and receipts to local county governments, and meet its no-jeopardy obligation.
- Congress and the President must ensure that when the Plan is finalized that there is adequate funding to fully implement it. When implemented, the Plan must adhere to the following principles to live up to the full commitment made to local counties:
 - Timber sale revenues must generate at least an amount equal to the funding that was provided to local counties through the Secure Rural Schools and Community Self-Determination Act on a yearly basis.
 - All BLM administered land should be managed to minimize the threat of catastrophic wildfire on these lands and surrounding state and private lands.
 - Access should be maintained through BLM administered lands for private land access, fire suppression, as well as recreational uses, such as hunting, fishing, boating and sightseeing.

In summary, the economic viability of our rural communities and the overall health of our federal forests are of vital importance to me. I ask that you give these comments full consideration as you prepare the FEIS and select the final management plan.

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Sincerely,

Signature: *Paul S. Wachter*

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