To: Western Oregon Plan Revisions  
P.O. Box 2965  
Portland, OR 97203

Fr: Dr. Dennis V. Higgins

Re: BLM proposed changes in western Oregon logging practices

November 2, 2007

You are to be credited for your clear presentation of data. However, two major sections of your DEIS demand response.

(1) Green tree retention: Your preferred alternative 2 provides none. (Your phrase itself is a nice euphemism for "clear-cutting"). More consistent with informed silviculture would be leaving on each acre 60 trees (of 11" diameter @ 4' height). This emendation would be environmentally sounder than alternative 2 allows.

It would also be economically more profitable to local communities, by generating forest jobs (conservation work, non-mechanized thinning) in addition to logging. Framing BLM bidding procedures in "stewardship contracts" could easily effect this change.

(2) Hidden postulates underlying "Socioeconomics": Your tables charting putative future economic impacts may or may not be tenable. Comparing, however, those "BLM projected county payments" to "historic payments" evades the truth: those "historic payments" were based on unsustainable levels of logging. BLM juggling cannot compensate for unrealistic conceptualizing at the highest levels of the current federal administration.

Thanks again for your hard work.