OR/WA State Director Edward Shepard Western Oregon Plan Revisions **Bureau of Land Management** PO Box 2965 Portland, OR 97208



Dear OR/WA BLM State Director Shepard:

I do not believe it should be a cut and dried decision saying our forests cannot be harvested because of endangered species. I also believe with the undergrowth we are seeing in our forests it is a fire bomb waiting to happen. It is sickening to see all of the wasted wood in the forests rotting away. Please use common sense when making your decisions on how to control our forests.

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

- While the Preferred Alternative 2 best represents the management alternative that I would support due to the fact that it provides the highest harvest level and funding to the Counties of the alternatives presented, none of the alternatives in my opinion meet the requirements set forth by the O&C Act because they do not manage the forested O&C lands for the dominant use of timber production as stated in the Act.
- 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 under the endangered species act.
- The BLM should consider active forest management for the protection of listed species and their habitat before adopting non-management reserve strategies. Disallowing timber harvesting in the majority (52%) of the forest land suitable for timber production is an ill-advised and scientifically unsound method of recovering a listed species and is contrary to the O&C Act. In the Southern Oregon area, timber reserves that do not allow harvesting have little chance of long term survival due to the high fire hazard that often exists in these forested lands. Areas that are designated to preserve characteristics that the owl and other listed species prefer should have a network of fuel breaks, roads and other forest management structures and techniques that will help to prevent the forest from being destroyed by wild fire.
- Only those areas where BLM ownership is large enough to make a significant contribution to the recovery of listed species should be allocated to that purpose.
- 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.
 - 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 plans.

aren Elmberger Karen Eilenberger 2302 St James Way

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