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Comments of James E. Nielsen
Revising the BLM's Resource Management Plans in Western Oregon

I have reviewed the Draft Environmental Impact Statement for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management Districts. After doing this I firmly believe that alternative #2 should be selected for implementation. My reasons for this opinion are as follows:

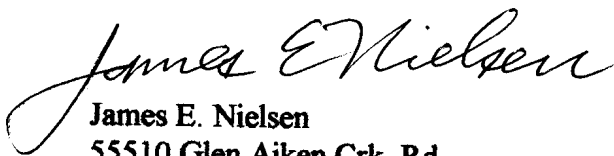
1. I have retired as a forester and silviculturist from the U.S. Forest Service and have felt that the decisions made in the Northwest Forest Plan (NWFP) were unbalanced from the standpoint of social and economic values. This combined with the appeals and lawsuits of the environmental preservationists has resulted in an implemented plan that has violated 2 of the 5 key guiding principles of the NWFP. Alternative #2 avoids these wrong decisions, and provides a level of timber harvest that fairly balances social, economic and environmental values.
2. The aquatic conservation strategy of the NWFP required, based on my experience, excessively large buffers on all classes of streams. I fully support the watershed and fisheries protection measures in alternative #2.
3. Recently, Congress decided not to renew payments to counties under the Secure Rural Schools and Community Self-Determination Act of 2000 (county payments). These payments were being made to reimburse timber dependent counties for the severe loss of revenue they sustained from the dramatic reduction of timber harvest on federal forest land from the implementation of the NWFP. I believe, then, that federal timber harvest should be increased to make up for this loss in county payments. Alternative #2 does this and I believe that it should serve as a model for timber harvest increases on all federal forest land - BLM and Forest Service.
4. Currently our country is experiencing massive trade and budget deficits. I believe that alternative #2 will help correct both of these very serious economic problems our country is experiencing. It will incrementally ameliorate the trade deficit by increasing the amount of domestically available timber rather than having mills import logs from Canada or, even worse, having companies import finished wood products from this and other countries. As the chart on page 236 shows, Canada has dramatically increased log imports as the volume of timber from federal forest land has decreased since 1997. Canada is the #3 country in the world as a source of our trade deficit.

Alternative #2 will also incrementally decrease the budget deficit since rather than depending on federal appropriated funds counties will gain revenue from the sale of federal timber and the economic multiplier effect of having federal timber processed into finished products by local mills and their supporting industries. This will increase employment and economic prosperity for timber dependent communities. From a social and economic values standpoint this is a much better solution than a federal handout which increases the budget deficit.
5. From reviewing the environmental consequences section, it is my opinion that while the environmental effects of alternative #2 may be somewhat higher with some resources than other

alternatives this is certainly within acceptable limits for a management plan that truly integrates and balances social, economic and environmental values. I believe that the environmental consequences section adequately documents this situation. The NWFP (No Action Alternative) certainly does not integrate and balance these values; the loss of timber industry jobs from this plan's inception and the fiscal crisis that many counties are now or will suffer is an obvious reflection of this failure. The trade and budget deficits are extremely serious threats to our country now and in the future. We can no longer afford to make decisions that optimizes environmental over social and economic values.

For these reasons I urge you to select alternative #2 for implementation.

Sincerely,



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cc:

Rep. DeFazio
Senator Wyden
Senator Smith