



B BAR K CASCADE RANCH

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*Via Certified Mail, Return Receipt Requested  
and Electronic Mail*

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Mark Brown  
RMPs for Western Oregon Project Manager  
Bureau of Land Management  
P.O. Box 2965  
Portland, OR 97208

Re: B Bar K Cascade Ranch, LLC, et al. Comments on Draft RMP/EIS for Western Oregon

Dear Mr. Brown:

This letter contains the comments of B Bar K Cascade Ranch, LLC, Chimney Rock Ranch, Little Butte Creek Ranch, BK Lost Creek Ranch, and Lake Creek General Store [collectively, "Ranch"] on the Draft Resource Management Plan/Environmental Impact Statement ("Draft RMP/EIS") for Western Oregon. The comments are submitted pursuant to Notices of Availability published at 80 Fed. Reg. 22992 (April 24, 2015) and 80 Fed. Reg. 23046 (April 24, 2015). BLM subsequently extended the comment due date to August 21, 2015, thus these comments are timely.

### **Introduction**

The B Bar K Cascade Ranch, LLC is headquartered east of Medford, Oregon. Its subsidiaries include the Chimney Rock Ranch, Little Butte Creek Ranch, BK Lost Creek Ranch, and the Lake Creek General Store. The Ranch employs 11 people full time as well as part time workers and outside contractors. It supplies housing to four of its staff. Currently the Ranch runs approximately 700 cow/calf pairs and has continued to improve both its beef production and the quality of the environment through selective use of irrigation, fencing, general repairs, improvements to water impoundments and irrigation ditches, elimination of noxious weeds, and state of the art animal husbandry. Capital investment in the Ranch has exceeded \$10 million over the last 9 years.

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The Ranch holds four grazing permits in the Ashland Resource Area under the management of the Medford, Oregon BLM District Office to graze cattle variously from May 1 to October 15 of each year on four allotments. These allotments are integral to the Ranch's successful production of beef. The allotments are intermingled with the Ranch's private lands, in some cases entirely surrounding private parcels owned by the Ranch and in some instances being entirely surrounded by Ranch private lands. Consequently, the Ranch and BLM are necessary partners in the utilization of the forage resource and in the protection of the environment that allows for continued production of forage year-in and year-out and continued protection of the environment where that forage grows. For these reasons, the Ranch is intensely interested in BLM's resource management planning process and its ultimate decisions on the BLM lands that are utilized in and around the Ranch. Poorly considered or arbitrary or capricious decisions have the potential to significantly adversely affect the Ranch's ability to operate as a cohesive ranching unit in an economic manner and, consequently, its ability to produce both environmental amenities and beef and other livestock byproducts. The environmental amenities include, but are not limited to, prime elk and black-tailed deer habitat and habitat for a host of other terrestrial and aquatic species including black bear, bobcats, cougar, coyote, California quail, chuckar, wild turkey (both Rio Grande and Merriam subspecies), ducks, geese, and native salmon in the waterways.

The Ranch appreciates this opportunity to comment and looks forward to the necessary changes in the Draft RMP/EIS addressing these comments. The Ranch's comments track the order of presentation in the Draft RMP/EIS to assist BLM in incorporating the comments into a supplemental DEIS and the eventual Final RMP/EIS and Record of Decision.

## **I. Draft RMP/EIS Summary**

The BLM summarizes the purposes of the RMP as addressing topics of sustained timber yield, conservation and recovery of threatened and endangered species, clean water, fire-adapted ecosystems restoration, recreation, and coordination with the Coquille Tribe. While this is an accurate summary of the stated purposes of the RMP, it demonstrates one of the consistent flaws of a Draft RMP/EIS which is the failure to give adequate consideration to other multiple uses found in the Federal Land Policy and Management Act ("FLPMA") and located in the Western Oregon Decision Area, specifically production of forage for livestock grazing. As the detailed comments, below, will amply illustrate, the Draft RMP/EIS should be supplemented to fully address the impacts of the plan on livestock grazing—a plan that may, by BLM's own admission, last for several decades once the Record of Decision is issued and any legal challenges are resolved.

## **II. Introduction**

BLM says it is preparing a single Draft RMP/EIS and a single proposed RMP/Final EIS that would be followed by two separate Records of Decision, one for the Southwest Oregon area including the Medford District and one for the Northwest Oregon area. The Draft RMP/EIS states that the proposed RMP/Final EIS will "more fully address the structure of the eventual

Records of Decision/RMPs.” (Page 3) It is unclear why the structure of the eventual dual Records of Decision cannot be fully addressed in the current draft so that the public may comment on this odd process of producing two RODs from one RMP/EIS. Thus, the public is denied the opportunity to comment on this structure including its efficacy and legality. BLM should include in a supplemental Draft RMP/EIS its explanation for the use of two RODs so that the public may have an opportunity to comment.

The Purpose and Need Statement at pages 5-6 is too narrow and at the same time too vague. Specifically, the purpose as stated is to enable BLM to deliver a predictable supply of timber from BLM lands. Other purposes include the impact of endangered species on timber production, the provision of clean water for recovery of listed fish and the failure to protect water quality and its impacts on timber production, and the need to address catastrophic wildfires and their impacts on timber production. Other purposes include providing for recreational opportunities and coordinated management with the Coquille Tribe. There is no discussion of other, numerous multiple uses of the BLM lands such as livestock grazing. As a result, the overly restrictive Purpose and Need Statement results in an overly restrictive list of action alternatives since the alternatives must respond to the purpose and need for the action. *See* BLM NEPA Handbook H-1790-1 (2008) at § 6.2.1 (“NEPA Handbook”).

The Purpose and Need Statement provides the framework for issue identification and forms the basis for the eventual rationale for selection of an alternative. *Id.* Consequently, an overly vague or narrow Purpose and Need Statement taints the entire analysis and renders the remaining alternatives analysis legally flawed. For example, under the Purpose and Need Statement, BLM cites FLPMA as requiring the public lands to be managed in a manner that will provide for outdoor recreation, citing 43 U.S.C. § 1701 (page 10). That same statute requires the public lands to be managed in a manner that will provide for “food and habitat for . . . domestic animals.” Yet, there is no mention of grazing as one of the purposes and a need for the RMP revision. BLM’s subsequent guidance for development of the action alternatives (pages 10-13) includes a two-sentence description of the designated lands that are available for livestock grazing and the need to identify the amount of forage available for that use, but this guidance is not contained within the Purpose and Need Statement as it should be, resulting in a dearth of analysis in the alternatives.

Tellingly, Appendix A, containing major legal authorities affecting the management of BLM lands omits any reference to the Multiple Use Sustained Yield Act of 1960, 16 U.S.C. §§ 528-531 (“MUSYA”). Inclusion of this Act and compliance with its requirements throughout the Draft RMP/EIS should be included in the supplemental DEIS that BLM should produce. Oddly, while BLM fails to cite or follow the MUSYA, it does cite the Greater Sage-Grouse Plan Amendments as existing decisions that will be carried forward into the Western Oregon RMP. BLM’s sage-grouse planning strategy for Oregon does not include any of the planning area addressed by the Draft RMP/EIS. *See* Figure 1-2 of the Oregon Greater Sage-Grouse Proposed RMP/Final EIS. The exclusion of the highly relevant MUSYA and inclusion of the irrelevant sage-grouse RMP is arbitrary.

### III. Alternatives

In the introduction to the Chapter 2, Alternatives, BLM correctly notes that the purpose and need for action dictates to range of alternatives that must be analyzed. Page 27, citing BLM NEPA Handbook. Again, because the Purpose and Need Statement is unnecessarily vague and constrained, the Chapter 2 alternatives are likewise inappropriately limited. For example, the summary of the resource-specific management objectives that are common to all action alternatives, pages 38-39, omits livestock grazing.

The detailed proposals for various uses will be addressed in the discussion of Chapter 3 describing the affected environment and environmental consequences. However, it is important at this juncture to make introductory comments about the alternatives as summarized in Chapter 2.

#### A. Alternative A

Alternative A proposes to make unavailable to grazing those allotments that have been vacant or inactive for five years or more. This is a bad idea. Given the fire-prone nature of BLM lands as discussed elsewhere in the Draft RMP/EIS, BLM should make vacant or inactive allotments available as forage reserves for livestock grazing in the event that forage on active allotments is rendered inaccessible due to wildfire, management prescriptions such as ACECs, or for other reasons. Forage reserve allotments are commonly utilized in both the BLM and Forest Service management of livestock grazing. Rendering vacant or inactive allotments unavailable through the RMP process would require an amendment to the RMP when, in subsequent years, active allotments become inaccessible and the vacant allotments are needed. Permittees should not be forced to go through the time consuming and difficult process, including additional NEPA analysis, to make previously available grazing allotments once again available for forage when those vacant allotments could be reserved now for those purposes. In addition, BLM has regulatory authority to increase permitted use where forage is available and demand exists. *See* 43 C.F.R. § 4110.3-1.<sup>1</sup> By permanently removing vacant or inactive allotments from availability, BLM unnecessarily constrains its options that are authorized by its regulations to increase permitted use.

Under Alternative A, lands with wilderness characteristics would be managed for their wilderness characteristics if those lands are not within the Harvest Land Base. As will be explained more fully below, BLM has been enjoined by Congress from managing lands for their wilderness characteristics because, to do so, creates de facto wilderness outside the Wilderness Act and in violation of FLPMA.

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<sup>1</sup> BLM grazing regulations set forth at 43 C.F.R. Part 4100 were amended effective August 11, 2006. *See* 71 Fed. Reg. 39402 (July 12, 2006). However, the implementation of those regulation amendments has been enjoined. *See W. Watersheds Project v. Krayenbrink*, 538 F. Supp. 2d 1302 (D. Idaho 2008), *aff'd in relevant part* by 632 F.3d 472 (9th Cir. 2011), *cert. denied* 132 S.Ct. 366 (2011). Citations to 43 C.F.R. Part 4100 in this letter are from the regulations in effect prior to July 12, 2006 as required by the injunction entered by the Federal District Court in Idaho.

## **B. Alternative B**

BLM's preferred Alternative B contains the same bad idea of making vacant or inactive allotments unavailable and management of lands with wilderness characteristics.

Recreation management would occur where it is not in conflict with primary uses of these lands. This is a good provision which should help prevent unnecessary and detrimental conflict between recreation and livestock grazing, a primary use of BLM lands pursuant to the grazing leases issued under the Taylor Grazing Act of 1934. However, Alternative B increases recreational use and increases protection for lands with wilderness characteristics, both of which are detrimental to livestock grazing if not in outright violation of the law.

It must also be noted that while Alternative B is the preferred alternative as required by NEPA and 43 C.F.R. § 46.425, BLM does not seem particularly wedded to its preferred alternative, noting as it does that BLM may modify Alternative B or develop a new alternative from the various alternatives within the Draft RMP/EIS as well as modify the preferred alternative when developing the Proposed RMP/EIS in response to public comments and feedback from cooperating agencies. While all of these potential modifications are contemplated by NEPA, it is important that BLM adhere to the principle that the proposed plan and its preferred alternative must be fairly within the bounds of the alternatives considered so that the public has an opportunity to fulfill one of the two major goals of NEPA, the review of and comment on the alternative ultimately chosen by the BLM.

## **C. Alternative C**

Alternative C similarly contains the ill-advised positions on abandoning inactive and vacant allotments and managing for wilderness characteristics.

## **D. Alternative D**

Alternative D completely eliminates livestock grazing by terminating existing grazing authorizations and making all allotments unavailable for grazing. This alternative should be summarily rejected due to its violation of FLPMA, MUSYA, the Taylor Grazing Act, the Public Rangelands Improvement Act, and their implementing regulations. Further, Alternative D would designate Extensive Recreation Management Areas on all lands where BLM has legal public access. This concept will simply exacerbate an already difficult situation where dispersed recreation is occurring on BLM lands often with the result that trespass occurs on intermingled private lands of the type owned by the Ranch. On the plus side, Alternative D would not include management for wilderness characteristics of any lands, in compliance with congressional mandates.

## **IV. Affected Environment and Environmental Consequences**

The scope of the analysis described at pages 93-94 states that there is no discreet section labeled as cumulative effects because of the nature of the analysis in this large-scale and long-term planning effort. This is an inadequate explanation. The Final EIS for the Oregon Greater

Sage-Grouse Resource Management Plan recently proposed to amend eight eastern Oregon RMPs, thus constituting an even larger-scale and similarly long-term planning effort. Chapter 5 of the Sage-Grouse RMP FEIS dedicated 186 pages to the cumulative effects analysis in a discreet, separate section. It is unclear why the Western Oregon planning effort could not similarly describe the cumulative effects as required by 40 C.F.R. § 1508.7. By combining the cumulative effects analysis within the discussion of the effects on each resource, the public is unable to discern what the cumulative effects will be for each alternative, especially since each alternative will have different direct and indirect effects. This approach is contrary to that recommended by the NEPA Handbook § 6.8.3.5. When BLM supplements the Draft RMP/EIS, it should follow the recommended structure for each cumulative effect issue described in that section of the NEPA Handbook. Failure to do so will make the Final RMP/EIS vulnerable to legal attack for insufficient cumulative effects analysis.

## **V. Areas of Critical Environmental Concern**

The discussion of ACECs is confusing because it is unclear which of the 126 existing and potential ACECs are already existing versus merely potential. It is not possible, therefore, to discern between those that are already in place and those which may be in place as a result of the action alternatives. As another example, at page 126, the BLM states that 17 of 32 nominated areas are recommended for further analysis as new potential ACECs but it does not identify those 17 potential ACECs. Tables 3-18, 19, and 20 are similarly vague, providing only numbers but not locations or names.

Appendix F provides more detailed information as does the interactive map available on the BLM website. The interactive map indicates, for instance, that the Lost Lake ACEC is in the no action alternative and all action alternatives whereas Table F-1 only addresses the action alternatives and does not explain that Lost Lake is also in the no action alternative, nor does it explain whether Lost Lake is an existing or potential ACEC.

Lost Lake ACEC is of interest to the Ranch because it is included in the Ranch's Lake Creek Summer grazing authorization. According to the Federal Register notice, if formally designated under this RMP process, the Lost Lake ACEC would continue to be closed to grazing. *See* 80 Fed. Reg. 23049 (April 24, 2015). There is no discussion, however, in either the Federal Register notice or in the Draft RMP/EIS section on ACECs or Appendix F as to why Lost Lake ACEC would continue to be closed if formally designated or why, instead, it could not be treated like other ACECs that are open to grazing with stipulations for fencing to control grazing or open to grazing with stipulations to monitor important values such as the nearby Hole-In-The-Rock ACEC. *Id.* The Lost Lake ACEC covers nearly the entire Section 35 in the easternmost portion of the Lake Creek Summer allotment, but the Ranch is unable to analyze BLM's rationale for proposed continued closure.

## **VI. Invasive Species**

BLM's analytical methods are suspect to the extent that BLM fails to measure the effects of general recreation use in addition to off highway vehicle use on the spread of invasive plant species, for instance through human and pet travel in the Decision Area as vectors for invasive

species. Additionally, here and in numerous other sections of the Draft RMP/EIS,<sup>2</sup> BLM states the assumption that OHV users would operate vehicles consistent with BLM decisions about OHV use. Noting that it possesses only some site-specific and anecdotal information about illegal OHV use, BLM states that it cannot predict the location or effects of widespread or systematic illegal OHV use. The Ranch has suffered extensive illegal OHV use, trespass, and poaching and has often cooperated with the BLM in an attempt to prevent or control such illegal use. This cooperation has resulted in monitoring of illegal OHV use and road closures. The benefits to the environment include less invasive species, less erosion, and less damage to other natural resources such as soils and native vegetation.

Where the BLM has incomplete or unavailable information, BLM cannot simply admit that to be the case and then base its analysis on assumptions. "If the incomplete information relevant to reasonably foreseeable adverse impacts is essential to a reasoned choice among alternatives and the overall cost of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement." 40 C.F.R. § 1502.22(a). Clearly, illegal OHV use is relevant to the adverse impacts that BLM must understand in order to make a reasoned choice among alternatives. BLM, thus, must include that information in the EIS. If the information "cannot be obtained because the overall cost of obtaining it are exorbitant or the means to obtain it are not known, the agency shall include within the EIS" more than just a statement that the information is unavailable or incomplete. *Id.* at (b). In addition, the BLM must include a statement of the relevance of the incomplete or unavailable information to its analysis, a summary of existing credible scientific evidence relevant to evaluating the impacts on the environment, and BLM's evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. *Id.* at (b)(1).

BLM's supplementation of the Draft EIS should include full compliance with the requirements in 40 C.F.R. § 1502.22 including use of theoretical approaches or research methods generally accepted in the scientific community to evaluate the impact of illegal OHV use in the Decision Area. As currently written, BLM's assessment of the risk of invasive plant species introduction and spread associated with OHV use is related only to legal use, thus incorrectly limiting the scope of the necessary analysis to analyze the impacts of invasive species. Additionally, BLM assumes that livestock grazing on BLM lands would continue to contribute to invasive plant species introduction and spread at current levels. *See* page 322. No basis is given for this assumption and no research is cited. Similarly BLM assumes that invasive plants occur in areas available for livestock grazing. *See* page 326. Again, there is no citation or supporting documentation for this assumption. And again on page 339, BLM states in a conclusory fashion that the no-action alternative would create the greatest risk of introduction and spread of noxious plants compared to action alternatives A, B, and C whereas Alternative D, with no acres available for livestock grazing, would have no risk. There is no quantitative, qualitative, or cited research in support of these statements. *See also* page 354. NEPA requires more of BLM than bald assumptions, as set forth in 40 C.F.R. § 1502.22.

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<sup>2</sup> *See, e.g.*, page 623, effect of OHVs on soil quality.

## **VII. Land and Realty**

The Lands and Realty section consists of a mere five pages and briefly mentions right-of-way avoidance areas and right-of-way exclusion areas without defining where those areas would be located. Consequently, the Ranch is unable to tell whether any of its allotments could be located in avoidance or exclusion areas that could have a significant impact on the Ranch's ability to access those allotments, including the potential impact on the Ranch's irrigation ditches. A passing reference is made to linear rights-of-way such as irrigation waterlines. The Ranch has irrigation ditches across the BLM Lake Creek Spring allotment that are vital to the Ranch's operations and that must be protected from either exclusion or avoidance. The long ditch that diverts water from the Lost Lake drainage has been maintained by the Ranch for more than 60 years and conveys a significant amount of water to 3,000 acres of irrigated pastures. The Ranch's water rights date back to 1895. Any disruption or loss of water rights or irrigation ditches would destabilize the Ranch and result in a taking of property rights related to the water and associated dams, spillways, and hundreds of miles of ditches from live water and seven lakes containing over 2,500 acre feet of storage. The Lands and Realty discussion should acknowledge valid existing water rights and irrigation ditch rights, protect those rights, and disclose any negative effect on those rights from the various action alternatives. Without further information, the Ranch is unable to ascertain whether its water rights, ditches and other linear rights-of-way might be in jeopardy.

The right-of-way avoidance and exclusion areas are not shown on BLM's interactive map. Only Table 3-86 gives some indication of what the avoidance areas are and Table 3-87 gives some idea of the exclusion areas. These include ACECs, previously discussed, including the Lost Lake ACEC. A significant portion of the Ranch's Grizzly Allotment is within the Grizzly Peak Trailhead and Grizzly Peak Trial Recreation Management Areas that are avoidance areas under various alternatives. Other than the two tables and two brief paragraphs, the Lands and Realty section is devoid of any analysis of the environmental effects from these proposed avoidance and exclusion areas. It is impossible to tell what these avoidance and exclusion areas, if implemented, will mean to the environment and what existing uses within those areas may be restricted to eliminated. It is noted, however, that BLM would strongly discourage rights-of-way and land use authorizations, such as grazing leases presumably, within avoidance areas unless BLM determines that a use is compatible with the purpose for which the area is designated and not otherwise feasible outside the avoidance area. *See* page 366. It is simply impossible for the Ranch to determine whether that means that the Ranch's grazing lease in the Grizzly Allotment would be significantly or completely terminated. BLM needs to supplement its analysis and make this clear to the Ranch and the public at large.

## **VIII. Lands With Wilderness Characteristics**

There are no designated Lands with Wilderness Characteristics near the Ranch's allotments. The closest one appears to be the Berry Creek LWC to the north/northwest and the Dakubetede LWC to the southwest. Nevertheless, because BLM's approach to LWCs is illegal and the potential that an LWC near the Ranch might be considered later in the planning process, the Ranch wishes to state for the record its position on LWCs and encourage the BLM to adopt its position.

Here and throughout the Draft RMP/EIS (*e.g.*, LWCs would be included in right-of-way exclusion areas, *see* page 366), the BLM states that it will manage LWCs to maintain all of the wilderness characteristics. *See, e.g.*, the statement on page 17, "BLM will consider whether to manage lands outside of designated Wilderness Areas for wilderness characteristics on public domain lands and acquired lands." Action Alternatives A, B, and C would protect all lands with identified wilderness characteristics to some degree. The environmental effects of these decisions are presented in one-half page at page 374.

BLM's plan to administer LWCs as though they are *de facto* wilderness is highly controversial and unsubstantiated in the law. Former Secretary of the Interior Salazar announced Secretarial Order 3310, Protecting Wilderness Characteristics on Lands Managed by BLM, on December 22, 2010. This so-called "Wildlands" order met with immediate public outcry and opposition since wilderness areas can only be established by Congress under the Wilderness Act. As part of Secretary Salazar's Wildlands initiative, BLM issued several manuals addressing consideration of wildlands in the inventory process and in the land use planning process. Congress intervened and the President signed into law a provision that defunded the Secretary's ability to enforce Secretarial Order 3310. *See* Department of Defense and Full-Year Continuing Appropriations Act, 2011, Pub. L. No. 112-10, 125 Stat. 38 (April 15, 2011).

Subsequently, on June 1, 2011, Secretary Salazar publicly stated that he would not designate any lands as "wildlands," effectively vitiating the two BLM manuals issued in support of Order 3310. However, BLM released Instruction Memorandum 2011-154 a month later which continued the policy and management practices of the illegal Order 3310 through BLM Manuals 6310 and 6320 which were nearly identical to the draft Wildlands Manuals 6300-1 and 6300-2 that were pulled back when Congress imposed its ban.

Congress once again discovered this renewed effort to use policy manuals to designate *de facto* wilderness. Members of the Senate and House wrote to Secretary Salazar in August 2012 urging him to immediately withdraw BLM Manuals 6310 and 6320. This has not been done and, in fact, the Draft RMP/EIS cites Manual 6310 for its support for inventorying wilderness characteristics and, without citing Manual 6320, identifies wilderness characteristics that would be protected under various action alternatives. *See* page 371. BLM would manage these LWCs with a variety of protective management initiatives including closures to motor vehicle, right-of-way exclusion areas, various surface stipulations, and the like. Manual 6320 is also currently being challenged in Federal District Court in Utah. In *Uintah County, Utah v. Jewell*, 10-cv-970-DB-BCW (D. Utah), state and local governments and private sector groups are suing the Secretary of the Interior for her continued use of BLM Manual 6320. The court denied various federal motions to dismiss the plaintiffs' complaints in July of 2014 and the court is currently allowing the parties to argue for completion or supplementation of the administrative record in the case.

BLM's alleged legal support for its management of Western Oregon LWCs for the wilderness characteristics and its extremely brief and incomplete analysis of the environmental effects of those decisions do not meet NEPA standards for a discussion of either the affected environment or environmental consequences of the proposed federal action as required by 40

C.F.R. §§ 1502.15, .16. Nor does it meet the agency's duty to ensure the professional integrity of the discussions and analyses in the EIS. *Id.* at § 1502.24.

## **IX. Livestock Grazing**

The Ranch has commented, above, on the inappropriateness of making currently vacant allotments unavailable for grazing in the future and the faulty elements of Alternative D that would preclude all grazing within the Decision Area. In addition, the impact of Alternative D would be felt throughout the intermingled private lands. As noted, the Ranch owns lands within BLM allotments and in some cases BLM lands are surrounded Ranch lands. A complete termination of BLM grazing would render great swaths of private land unavailable for livestock grazing due to federal prohibitions on fencing lands so as to enclose federal parcels. The result would be that use of private lands for grazing would raise the specter of potentially constant and unintended trespass on BLM lands.

Closure of all of the BLM lands to grazing runs counter to FLPMA's definition of domestic livestock grazing as a "principal or major use" of the public lands. 43 U.S.C. § 1702(l). When enacting FLPMA, Congress did not repeal or modify the grazing provisions of the Taylor Grazing Act. 43 U.S.C. § 1701(b). The Taylor Grazing Act authorizes the Secretary to regulate occupancy of the public rangelands for, among other purposes, their orderly use, improvement and development of the range. 43 U.S.C. § 315a. In addition, the Public Rangelands Improvement Act recognizes the need to manage public rangelands to be as productive as feasible for all rangeland values. 43 U.S.C. §§ 1701(b)(2), 1903(d). Eliminating grazing would disrupt the orderly use of the range, breach the Secretary's duty to adequately safeguard grazing privileges, be contrary to the protection, administration, regulation and improvement of public lands, hamper the government's responsibility to account for grazing receipts, and impede range improvements as authorized by both the Taylor Grazing Act and FLPMA (43 U.S.C. § 315i; 43 U.S.C. § 1751(b), respectively). Notably, reduction or elimination of grazing would significantly increase the risk of fire danger to both BLM and neighboring non-federal lands due to the build-up of fine fuels. The Draft RMP/EIS makes passing reference to this reality, but it deserves more analysis and discussion that should be included in a supplemental Draft EIS.

The information within the Livestock Grazing section of the Draft RMP/EIS on AUM numbers is also inaccurate. There is no statement of permitted use AUMs that reflect grazing preference. Instead, the BLM only accounts for active AUMs in Table 3-92 and does not account for temporarily suspended AUMs that are part of the overall permitted use. Tables 3-93 and 3-94 use vague terms such as "total AUMs" and "available AUMs" without noting whether those AUMs reflect permitted use AUMs or active AUMs. Also telling is that in Table 3-94, in the Medford District, "available AUMs" have declined by 41% in the 20 years between 1995 and 2014. Active allotments have been reduced by nearly 50%. BLM has failed to include any alternatives that would increase grazing use consistent with the numerous federal statutes supporting grazing as a valid and principal use of federal lands. Action Alternatives A, B, and C would retain all active allotments but make vacant allotments unavailable for grazing. Figure 3-122 is greatly inadequate for the public to determine where specifically the unavailable allotments are located given the wholly inadequate scale of the figure. The RMP interactive map available on the BLM's website does not include a grazing allotment layer. Consequently it is

impossible for the public to discern where the vacant allotments are located and whether those allotments might be useful as forage reserves or for potential increases in AUMs after converting the vacant allotments to active status.

The entire tone of the grazing section is one of reduction and restriction. *See*, for example, the sentence at page 384, “The BLM may decrease stocking levels through subsequent agreements or decisions as necessary.” There is no corresponding statement that BLM also has the authority to increase stocking levels through subsequent agreements or decisions as necessary to take advantage of the public rangeland resource. Additionally, the environmental consequences state “No increases in stocking rate would occur due to increased forage availability.” This paradoxical statement is unexplained and lends to the overall tone of livestock reduction.

Issue 2 in the Livestock Grazing section (pages 385 et seq.) needs to be completely redone. The “Background” discussion cites to regulations that are not in effect. Specifically, in addressing the issue of attainment of Standards for Rangeland Health and Guidelines for Livestock Grazing Management, the BLM quotes 43 C.F.R. § 4180.2(c)(1), referring to them as “the 2015 changes” in the regulations. No Federal Register citation is provided to the reader to find these “2015 changes.” The 2015 edition of the Code of Federal Regulations, Title 43, has not yet been promulgated. The October 1, 2014 edition of the BLM regulations contains the quoted passage and cites to the amendments promulgated in July 12, 2006. As noted in footnote 1, above, the 2006 amendments were enjoined by a Federal District Court. This means that the regulations cited in the Livestock Grazing section at page 385 as prior to the “2015 changes” are actually the current BLM regulations in place. These are the regulations that control the BLM and not those quoted and cited as the “2015 changes.” BLM needs to redo its analysis in light of the currently applicable regulations.

BLM also needs to check the information contained in Appendix K, Livestock Grazing, for accuracy. For example, the Table K-2 lists grazing allotments in the Medford District. It lists the Grizzly Allotment, No. 10119, as having 378 active AUMs and no suspended AUMs. This is inaccurate. In fact, the Grizzly Allotment has a permitted use level of 603 AUMs of which 378 are active and 225 are suspended. *See* Grazing Authorization Nos. 3602404 and 3602405. Questions also arise as to the categorization of allotments where, for instance, the Ranch’s Grizzly, Lake Creek Spring, and Lake Creek Summer allotments are all categorized as in need of improvements to manage and resolve a high level of resource conflicts and concerns. The Ranch’s Deer Creek Reno lease is categorized as custodial—managed to protect resource conditions and values. Yet all four allotments are listed in Table K-2 as not meeting rangeland health assessment standards for reasons other than livestock grazing. Why all four allotments are not custodial is unclear.

The Management Direction for the Medford District appropriately calls for resumption of livestock grazing when soil and vegetation have recovered from initial disturbance to a level that would support livestock grazing. *See* page 941. Additional support for grazing is encapsulated by the direction to allow grazing where it will not impede site recovery or where livestock are used as a tool to achieve certain recovery objectives. It is also appropriate and helpful to recognize, as the Management Direction does, that livestock can be used to control invasive

species, reduce fire danger, and accomplish other management objectives. While these management directions are appropriate and consistent with federal law, they are not reflected in the action alternatives other than through the brief statements contained in Appendix B. *See also* Management Direction for Alternative B at 953 and Alternative C at 966.

## **X. Socioeconomics**

Chapter 3's discussion of socioeconomics is robust but the discussion of the impact of grazing on the local economy is marred with meaningless comparisons. For example, Table 3-153 purports to compare the value of BLM AUMs based on the federal grazing fee to the market value for the same number of AUMs on private land and state land. Once again, the BLM uses active AUMs without reference to total permitted use AUMs and suspended AUMs. The chart, footnote 1, defines an active AUM "as a measure of the amount of forage available on land designated for grazing in a given year" but that is entirely incorrect given that suspended AUMs measure forage physically available on lands designated for grazing but administratively suspended by BLM for one reason or another. Thus, the chart woefully underestimates the amount of forage on BLM lands.

BLM compounds this error by assuming that the number of billed AUMs in a particular BLM district times a private forage price of \$16.80 per AUM reveals the market value of the BLM AUMs if they were available in the private sector. In an explanation in text below the chart, BLM states that the price of an AUM on BLM-administrative land "may not" compare directly to grazing fees on private land because private grazing fees may include other services such as fencing and water infrastructure that BLM allotments do not provide. This proposition is not in question; it is a certainty. The price of an AUM on BLM land clearly does not compare directly to grazing fees on private land and not just because of fencing and water infrastructure. Many other attributes of AUMs available in the private sector are not found on public lands including fences, oversight, labor, proximity to commercial activity, and no public access. Consequently, it is meaningless to simply multiply BLM AUMs times the private price of an AUM in an attempt to determine the market value of those BLM AUMs if they were in the private sector. The AUMs on federal lands are entirely incomparable and worth significantly less than AUMs on private lands. Table 3-153 leads the casual reader to the incorrect assumption that, on the Medford District, the private market value of BLM's billed AUMs is over \$115,000 whereas BLM is only collecting less than \$10,000 for a loss of over \$100,000 to the government. This type of misinformation needlessly fosters public mistrust of BLM programs and resentment of federal land ranching permittees. This information should be accurately depicted in the socioeconomics chapter.

Similarly, Table 3-159 suggests that the overall economic value of public lands grazing is limited the value of the grazing fees collected. (Compare Table 3-159 Economic Value of \$22,000 to Table 3-153 Total BLM Grazing Fee Revenues of \$22,000.) This table entirely discounts the value of the new wealth created from the sale of beef and cattle byproducts and relies solely on the BLM's grazing fees as a measure of the economic value of public lands ranching. There is also no calculation for the value to the local economies from the purchase of goods and services by ranchers in support of public lands ranching including employment, farm equipment, ranch supplies, vehicles and their maintenance, and the myriad goods and services

tied directly to livestock grazing on public lands. As noted at the outset, the Ranch has invested an average of more than \$1 million per year over the last 9 years, providing significant jobs and benefits to the local economy. In addition to the taxes generated by this activity, the Ranch benefits the Medford area and Jackson County with its large ranching and wildlife enhancement activities. BLM's summary of economic value epitomizes BLM's manifest inattention to the importance of livestock grazing in western Oregon and the overall failure of the Draft RMP/EIS to analyze the affected environment and environmental consequences of that activity.

## **XI. Trails and Travel Management**

The statement is made in the two points of this section that reciprocal rights-of-way agreements over O&C lands do not grant rights for public access and recreational use. However, BLM omits the key point that other BLM rights-of-way across private lands are not so limited and provide for full public access that can often cause significant management and resource problems for the burdened private lands. Otherwise, this section notes that BLM is deferring implementation of travel management plans that are scheduled to be completed within five years after the Western Oregon RMPs. Thus, little analysis is devoted to this important issue.

Cross reference is also made to Appendix P regarding OHV management guidelines. There, a statement is made that all motorized vehicles are prohibited from entering closed OHV areas unless authorized by the BLM for administrative purpose. (Page 1386.) BLM should also recognize that OHV use may be authorized by the BLM in execution of valid existing rights and leases such as grazing. Neither Appendix P nor the section on Trails and Travel Management includes provisions to recognize appropriate OHV use related to permitted activities such as grazing. Instead, as noted elsewhere, the BLM makes the unsupported assumption that all OHV use by the public is consistent with BLM decisions about OHV use. Illegal use of OHVs is of great concern to the Ranch and other permittees especially in light of BLM's admission that even under the most restrictive alternative for OHV use (Alternative C), the BLM would close less than 1% of its lands in the Decision Area to OHV use. (*See* page 640.)

## **XII. Best Management Practices**

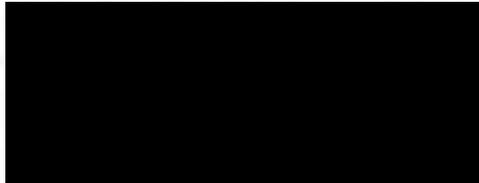
Appendix I contains various BMPs for authorized uses. The section on BMPs for range management focuses entirely on protection of riparian resources but there are no corresponding BMPs for development of upland water development sites for livestock. It is insufficient to simply promote BMPs to restrict livestock access to water without providing alternative water sources through development in upland locations. Livestock obviously need water and the BMPs are overly restrictive in the absence of upland water development proposals.

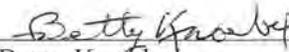
## **Conclusion**

The Ranch appreciates this opportunity to comment on the BLM's Draft RMP/EIS for Western Oregon. BLM has devoted significant staff resources and expertise to the development of the document and yet there are significant errors and omissions contained therein as detailed above. Where there are significant new circumstances or the BLM obtains significant new information relevant to the environmental concerns and bearing on the proposed action or its

impacts, BLM must prepare a supplemental Draft EIS. 40 C.F.R. § 1502.9(c)(1)(ii). The information provided by the Ranch presents significant new circumstances and significant new information that require supplementation. The Ranch looks forward to receiving the supplemental Draft EIS and the opportunity to comment on that supplemental draft so that the Final RMP/EIS and Record of Decision are fully defensible and provide the public with a full and clear explanation of the bases upon which the BLM makes its decisions.

Sincerely,



  
Betty Knoebel  
Manager

## Jasmine Benjamin

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**From:** m1allen@blm.gov on behalf of RMPWO\_Comments, BLM\_OR  
<blm\_or\_rmpwo\_comments@blm.gov>  
**Sent:** Friday, August 21, 2015 12:13 PM  
**To:** RMP-Comments@heg-inc.com  
**Subject:** Fwd: COMMENTS ON THE DRAFT RMP  
**Attachments:** 20150820131656467.pdf

----- Forwarded message -----

**From:** **Monica Jelden** <[MJelden@senecasawmill.com](mailto:MJelden@senecasawmill.com)>  
**Date:** Thu, Aug 20, 2015 at 2:02 PM  
**Subject:** COMMENTS ON THE DRAFT RMP  
**To:** "[blm\\_or\\_RMPWO\\_comments@blm.gov](mailto:blm_or_RMPWO_comments@blm.gov)" <[blm\\_or\\_RMPWO\\_comments@blm.gov](mailto:blm_or_RMPWO_comments@blm.gov)>  
**Cc:** Ted Reiss <[TReiss@senecasawmill.com](mailto:TReiss@senecasawmill.com)>, Todd Payne <[tpayne@senecasawmill.com](mailto:tpayne@senecasawmill.com)>, Dale Riddle <[DRiddle@senecasawmill.com](mailto:DRiddle@senecasawmill.com)>

Good afternoon,

Attached are the Seneca Family of Companies comments, which include Seneca Sawmill Company, Seneca Jones Timber Company and Seneca Sustainable Energy, regarding the proposed draft RMP. We appreciate the opportunity to comment and will also forward these comments via regular mail. Much of our timberland is intermingled with BLM ownership and as your immediate neighbor we experience first-hand the impacts on how proposed plans affect these lands. As a BLM timber purchaser and a reciprocal right-of-way permittee we view and travel this resource, both from a timber and transportation system, every day. As a family forestland owner, we know there is more opportunity in the management of this vast timber resource than the proposed alternatives present.

The best possible management of O & C Lands is vital to the local communities, families and economy of Western Oregon. As supported by law, let's do the right thing for the timber dependent communities of Oregon, they are counting on it.

Monica Jelden  
Land Use Manager  
Seneca Jones Timber Company  
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(541)852-0933 Mobile  
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[www.senecasawmill.com](http://www.senecasawmill.com)

*From humble roots, producing just 18-million board feet of lumber in 1954, today, Seneca Sawmill currently includes three sawmills in Eugene, Oregon and one in Noti, Oregon, with production levels exceeding 650-million board feet. Supporting these operations is Seneca Jones Timber Company which sustainably manages 165,000 acres of timberlands that produces raw material for our sawmills. Our newest facility, Seneca Sustainable Energy, utilizes by-products from our forest and sawmill operations to produce 19.8 MW's of renewable power (enough for 13,000 homes on an annual basis) which is utilized by our local community, plus steam for our on-site dry kilns. Collectively, these companies form the Seneca Family of Companies which support over 400 local family wage jobs.*

-- NOTICE: It is okay to print this email. Paper is a plentiful, biodegradable, renewable, recyclable, sustainable product made from trees that supports our economy by providing jobs and income for millions of Americans. Thanks to improved forest management, we have more trees in America today than we had 100 years ago. --

August 20, 2015

Mr. Jerome Perez, State Director  
Bureau of Land Management  
1220 SW 3<sup>rd</sup> Avenue  
Portland, OR 97204

Dear Mr. Perez:

Thank you for the opportunity to provide comment on the BLM's draft Resource Management Plan/Environmental Impact Statement (RMP). It makes for 1,500 pages of interesting reading and is just a little longer in length than Leo Tolstoy's great novel, War and Peace. After nearly 78 years following the passage of the O & C Act, there is a lot to be learned from the legacy in managing these lands on what they have contributed and provided in the past and potential opportunities that they can continue to contribute and provide for our future.

The O & C Act directs the primary mandate for 2,025,826 acres of O & C land and 74,598 acres of Coos Bay Wagon Road lands for permanent forest production. The timber thereon shall conform to sustained yield principles to promote timber supply, watershed protection and most importantly contribute to the economic stability of local communities and industries, and provide recreational facilities. Furthermore, the multiple use-management direction of FLPMA does not apply to the O & C lands that are suitable for timber production.

Despite the full force and effect of this Act, the allowable sale quantity (ASQ) listed in the RMP depicts alternatives providing an ASQ of 120 – 486 million board feet per year. In other words, the RMP alternatives provide a timber production level ranging from 57 board feet to 231 board feet per acre.

The RMP depicts a Total Harvest Land Base (Table 2-10) under the various alternatives, ranging from a low of 298,121 acres to a high of 691,998 acres. This suggests that the BLM is utilizing 67% to 86% of O & C lands for other purposes or deems this land is not suitable for timber production. The RMP should be clear that sustained-yield timber production is the primary or dominant use of the O & C lands in western Oregon.

It's extremely distressing that the BLM states "Moreover, the BLM does not accept that the O & C Act requires that this RMP provide an annual productive capacity of "not less than one-half billion feet board measure" of timber" (Page 82). Thereafter the BLM states in the next paragraph "*Changes to existing laws or repeal of existing laws are not within the authority of the BLM and would be beyond the scope of this action, . . . The purpose and need specifically includes providing a sustained yield of timber as required by the O & C Act.*" The O & C Act is clear "*Provided, That timber from said lands in an amount not less than one-half billion feet board measure, OR not less than the annual sustained yield capacity when the same has been determined and declared.*"

In 1940, the O & C lands had inventory volumes of approximately 46 billion board feet on 2,165,900 acres or 21.23 MBF/acre. In 2006, the RMP shows that both inventory volumes and acres increased to 73.3 billion board feet on 2,197,000 acres or 33.36 MBF/acre. This represents an increase in inventory volume over the period of 59%, despite increased harvest levels during the period from 1962 to 1990. Should timber inventories increase by 59% in a



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scenario guided by sustained yield principles or is this a leading indicator that O & C lands can support higher ASQ levels?

For the public and local communities of Oregon this increase in inventory should be excellent economic news and correlate to increased timber production. However, the 1995 Declared ASQ plummeted to 203 million board feet, a decrease of 59% over production levels set in the O & C Act. The alternatives described in the RMP suggest varying ASQ levels ranging from a low of 120 to a high of 486 million board feet. Regrettably, none of these ASQ levels meet O & C Act requirements, despite the significant increase in inventory.

Based on the Total Harvest Land Base (ranging from 298,121 to 691,998 acres) and the varying ASQ levels (ranging from 120-486 million board feet) each acre of O & C land will have a harvest level ranging from 402-702 board feet per acre, while each acre based on inventory contains 33,360 board feet per acre. Does this level adequately represent an annual sustained yield productive capacity? The BLM admits that between 1990 and 2006 harvest levels were below the maximum potential annual productive capacity (Page 256).

To further demonstrate timber production potential, in 2008 the BLM performed a reference analysis maximizing timber production which indicated that BLM-administered lands in the planning area are capable of producing approximately 1.2 billion board feet per year (Page 261). Despite this potential for timber production, existing and proposed ASQ levels on O & C lands are measurably deficient. The draft RMP should include an Alternative that meets or exceeds minimum O & C Act requirements.

More importantly what effects do these reduced harvest levels have to our communities, transportation system and future access needs?

Admittedly, the way the BLM manages timber is by far the number one issue of concern among community leaders. The primary concern is economic. Almost every community representative spoke of community financial stresses. The inability of some O & C counties to provide public safety services in the face of declining Federal payments is another major concern for both County and State officials. Many community representatives spoke of the impact of the reduction in timber payments to the counties, which have resulted in the counties reducing or cutting off funds to the cities. The community representatives share a common view that the BLM is party to a worldview that no longer allows for economic use of a timber resource that is both abundant and renewable.

Let's consider what these alternatives do to jobs at the local level and how job loss effects our communities and the private taxpayer. Admittedly, there are large differences between compensation for timber-related jobs compared to recreation related jobs in western Oregon. The average forest products industry job-holder earns approximately \$58,000 while the average recreation or tourism based job earns roughly one-third of this amount. Jobs and earnings associated with transportation of logs and lumber are not represented in Tables 3-175 and 3-176, but could be extrapolated based on known harvest and production levels, adding



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emphasis to the significance of timber related employment. The labor budget expenditures shown in Table 3-206, suggest that average BLM labor costs surpass even these levels. The proposed alternatives will have a detrimental effect especially on the economies of Roseburg and Coos Bay, which are more dependent on BLM timber harvests and key BLM District centers. In addition, BLM employment and jobs shift among the alternatives. With the exception of Alternative C, it appears the BLM will also experience job loss (Table 3-207). This analysis fails to consider the human condition on job loss and the potential impact on individual families who may experience wage loss. This analysis also fails to consider the cost of relocating these families or for families that cannot be relocated considering what job they may find. Will these local areas be able to generate jobs equivalent to the family wage jobs that are lost? This analysis should provide information on how any potential job loss affects the local taxbase. It appears an injustice to adversely affect communities and families with unnecessary timber related job loss, both from the private and government sector, from the implementation of an RMP.

Secondly, the BLM has responsibilities in maintaining the reciprocal right-of-way program on O & C lands, this analysis does not show the effects the proposed BLM job losses will have on this program.

The draft RMP focuses significantly on what O & C payments would have been under existing ASQ levels, but inadequately compares what O & C payments should be based on the annual productive capacity of the O & C lands. Table 3-191 describes Total payments to O & C counties by alternative in 2018 and 2028. This table demonstrates the No Action Alternative, and Alternatives A-D, but fails to perform a comparative analysis based on maximizing timber production. Under the O & C Act, this maximized analysis should be the base point on which all other alternatives are measured against and compared, to reflect the true economic value of what these alternatives are costing our local communities.

Table 3-191 shows stumpage prices decreasing in 2028 vs. 2018 levels, market conditions suggest this is highly unlikely. The BLM should provide historical information to determine if BLM stumpage prices correlate with market prices. If significant changes between BLM stumpage prices and market prices are either increasing or decreasing over time, other factors may be involved and should be a part of this analysis.

The RMP states that the timber industry has a long, national history of high volatility, alternatives with harvest volumes that exceed current levels are likely to introduce greater instability into local economies (Page 568). This analysis should focus on western Oregon specifically rather than the national timber industry. We can agree that the timber industry in Oregon is a cyclical business. However, the volatility the timber industry experienced is a culmination of factors, including the listing of the northern spotted owl, as well as reduced timber harvests on federal lands. The draft RMP inadequately examines the effect of reduced timber harvest overtime and how these harvest reductions impacted the Oregon timber economy, both in job loss and manufacturing capability. Rather, the RMP (Page 535) describes a shrinking of the wood products manufacturing industry since 2001 without adequate explanation.



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The public's demand and consumption of wood products continues to increase and western Oregon's ability to grow an abundant timber supply will help maintain Oregon as a national leader for the production of timber and timber products. The RMP does not address the public's consumptive need for wood products. Rather it suggests that an increase in public harvest will be offset by a reduction in private harvest. The RMP readily admits that it did not take into account the potential responses of other non-BLM timberland owners in analyzing market conditions. Given the checker boarded ownership between public and private land, this analysis should consider this input essential, similarly to the input provided by tribal and community leaders. We do agree that markets are constantly changing and once a change is introduced, timberland owners and producers will react to those changes. In this case, the results are more likely to be beneficial for increased jobs and economic benefits, rather than negative as suggested in this analysis.

The BLM harvest in 2012 yielded neither very large nor very small logs (Page 544). Composition of log sizes is an important element. In conducting a socioeconomic analysis, the BLM should consider the size and type of material in each alternative by District and the manufacturing/processing capacity unique to each District. The BLM's preferred alternative B appears to dramatically drop the ASQ harvest in Coos Bay, Medford and Roseburg, while increasing Salem's. How will these levels correlate to manufacturing/processing capacity in these areas? Failure to perform this specific analysis seems an injustice and could further adversely affect communities and local tax bases.

The RMP through the use of non-market valuation techniques, supports recreation value on BLM-administered lands at \$223 million in 2012, while the harvest value of timber for the same time period is \$23 million. There is incommensurate emphasis placed on recreation's non-market value and how that differs substantially from the intrinsic harvest value of timber, rather it appears that recreation is the most important value component on O & C lands. Under the O & C Sustained Yield Act permanent timber production is the most important component and the draft RMP should provide clear direction, rather the RMP suggests that timber activities degrade an areas' naturalness, impedes recreation and creates undue soil disturbance.

*"Legal public access is often not available where private lands surround BLM-administered lands. In such cases reciprocal right-of-way agreements, easements, and unsecured access rights across adjacent private lands all have a determining effect on public access, which in turn, influence visitor use"* (Page 466). The BLM has assigned either a secured or an unsecured legal public access status to every Recreation Management Area. It is difficult to determine in the recreation analysis acreage, which acreages represent which access category, given that legal access is an important component and that 75% of O & C lands are impacted by reciprocal right-of-way agreements (Map 3-6). If all areas are included, both secured and unsecured access, then it is important to insure that recreational conflicts do not create incompatibility with timber harvest activities. Several incompatible uses discussed in the RMP include OHV use, providing recreational target shooting and the spread of non-invasive vegetation.



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The BLM is a major provider of outdoor recreation opportunities throughout western Oregon. Participation on BLM-administered lands in western Oregon numbered approximately 10.8 million participants in 2013 and the BLM projects overall participation levels to increase, reaching 16.5 million participants by 2060. It would be helpful to have historical information reflecting recreational use and how these numbers are derived, as it directly correlates to use of our mutual transportation system.

The BLM owns and manages approximately 15,000 miles of roads (Page 635). It's disappointing that this RMP depicts roads negatively, as a soil disturbance and unnatural, when roads are a beneficial resource providing a plethora of uses for management, fire suppression and recreationalists seeking access. The biggest concern regarding roads is their condition and the size of the deferred road maintenance backlog. Currently the deferred road maintenance backlog exceeds \$300 million. The BLM is likely to continue to accrue new deferred maintenance in the first decade under any of the alternatives. As a reciprocal right-of-way holder, this is completely unacceptable and this RMP should discuss an alternative to alleviate this situation, rather than defer to the implementation of the Travel Management Plan which may not provide an opportunity to address or allocate resources. Additionally, the BLM indicates that the collected account has declined dramatically, from \$8 million annually 25 years ago, down to only about \$3 million annually currently (Page 647). This data fails to consider that many reciprocal right-of-way permittees perform user maintenance at significant levels and these dollars are not captured in this analysis, rather they are returned to the road to benefit the transportation system. The good news is that 85% of bridges and 97% of major culverts are in good condition.

As a reciprocal right-of-way agreement holder, both parties have mutually agreed to provide access to each other's lands. We note that the draft RMP discusses both Right-of-Way Exclusion and Right-of-Way Avoidance areas. These areas vary widely by each alternative.

Right-of-Way Exclusion areas include lands designated as:

- Wilderness
- Lands managed for their wilderness characteristics
- Designated and suitable Wild and Scenic Rivers
- Class I Visual Resource Management areas

Right-of-Way Avoidance areas include areas of:

- Critical Environmental Concern
- Recreation Management Areas
- Wilderness Study Areas
- Designated and suitable Wild and Scenic Rivers classified as scenic and recreation rivers
- Class II Visual Resource Management areas

The Right-of-Way Avoidance category includes Recreation Management areas, which once again places a higher priority on recreation over timber management. In addition to access



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restrictions, Visual Resource Management Class I and Class II lands seriously limit the harvest methods that can occur, in some cases to support a recreation management goal. The various alternatives also discuss including additional rivers to varying degrees (Little North Fork Santiam River, North Fork Siletz, Rogue River, Sandy River, Table Rock Fork Molalla, West Fork Illinois) that meet suitability criteria to the Right-of-Way Avoidance and Exclusion areas.

We have concerns that several of these classifications fall under FLPMA and should not unduly impede access to existing or future reciprocal right-of-way agreement permittees who have provided forest management access to the BLM. For all allocations, the Forest Management objective stipulates the BLM will "*allow road construction and maintenance, placement of yarding corridors and construction of skid trails and landings based on operational needs as well as for those with valid and existing rights*" (Page 916). This may adequately cover existing rights but may negatively impact future permittees access to private timberland without an existing agreement? The BLM will also consider whether to manage lands outside of designated Wilderness Areas for wilderness characteristics on O & C lands where management for wilderness characteristics would not conflict with the planning for sustained-yield timber production for the purposes of the O & C Act. Managing for wilderness characteristics will likely create additional reserve areas that will eventually be removed from the Harvestable Land Base.

Under the O & C Act, the BLM has no specific wildlife conservation mandate (Page 21). In the RMP there appears to be an inconsistency on which lands are included in the analysis. Some species analysis includes only BLM-administered lands, while other species include non-BLM administered lands and private lands. The scope of this analysis for all species, including plants and/or wildlife, should be limited to BLM-administered lands only. In the case of Black Tailed Deer and Roosevelt Elk for example, the BLM considers non-BLM administered lands as providing early-successional forest stages, rather than developing an analysis on how to increase early-successional, evenly distributed age classes on BLM-managed land to aid the species.

On all land ownerships in the planning area, the BLM also simulated the northern spotted owl (NSO) population response and hypothetical assumptions were derived for encounters and interaction with the barred owl. The NSO population is under severe biological stress. The draft RMP focuses on maintaining habitat conditions, while at the same time suggests that habitat quality and spatial arrangement are weak predictors of population performance (Page 782), i.e. NSO on BLM-administered lands are known to nest, and produce young, in habitat conditions that are well below Recovery Action 10 thresholds. A key point identified by the Fish and Wildlife Service is the east-west connectivity from the Oregon Coast Range to the Oregon Western Cascades. This analysis should include information on NSO migratory habits. In addition, little information is provided on how reduced harvest levels on BLM O & C lands over the past 20 years have impacted the survival of the NSO. The analysis is unclear, by improving habitat for the NSO, are we effectively and essentially improving habitat for the barred owl which outbreed and outcompete the NSO. Also, how does this plan address the potential opportunity for interbreeding between the two species?



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The BLM has a duty to find a way to concurrently implement all these laws, in a manner that harmonizes any seeming conflict between them, unless Congress has provided that one law would override another law, such as with the O & C Act and FLPMA. Certainly, the alternatives depicted in this RMP EIS do not meet the needs of the O & C Act, nor is it clear that sustained-yield timber production is the primary or dominant use of the O & C lands in Western Oregon. These lands possess an extremely valuable resource and play a vital role in contributing economic stability to local communities, industries and family wage jobs and there is a vast opportunity to do even more as intended by law.

*"Writing laws is easy, but governing is difficult"*      -Leo Tolstoy

Sincerely,

A handwritten signature in cursive script that reads "Monica Jelden".

Monica Jelden  
Land Use Manager

cc:    T. Payne  
      T. Reiss  
      D. Riddle

## Jasmine Benjamin

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**From:** m1allen@blm.gov on behalf of RMPWO\_Comments, BLM\_OR  
<blm\_or\_rmpwo\_comments@blm.gov>  
**Sent:** Friday, August 21, 2015 12:44 PM  
**To:** RMP-Comments@heg-inc.com  
**Subject:** Fwd: Public Comment: RMP DEIS  
**Attachments:** S-BLM\_RMP\_comment\_August\_2015.docx

----- Forwarded message -----

**From:** **Suzie Savoie** <[klamathsiskiyou@gmail.com](mailto:klamathsiskiyou@gmail.com)>  
**Date:** Thu, Aug 20, 2015 at 11:54 PM  
**Subject:** Public Comment: RMP DEIS  
**To:** [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)

Jerome E. Perez

ATTN: Mark Brown

Submitted via Email: [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)

RE: Resource Management Plans for Western Oregon Draft Environmental Impact Statement

Attached is a document containing my public comment concerning the Draft Environmental Impact Statement (DEIS) for the Resource Management Plans (RMP) for BLM forests and watersheds in Western Oregon.

Please let me know if you have any problems opening or reading the attached public comment document.

Sincerely,

Suzie Savoie

--  
Suzie Savoie



Jerome E. Perez  
State Director Washington/Oregon  
Bureau of Land Management  
P.O. Box 2965 Portland, Oregon 97208

ATTN: Mark Brown  
Submitted via Email: [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)

RE: Resource Management Plans for Western Oregon Draft Environmental Impact Statement

Dear Director Perez:

Below are my comments concerning the Draft Environmental Impact Statement (DEIS) for the Resource Management Plans (RMP) for BLM forests and watersheds in Western Oregon.

My passion for healthy forests, clean water and a sustainable economy comes from the many facets of my life: I am a hiker, backpacker, amateur botanist, naturalist, bird watcher, monarch butterfly enthusiast, native plant lover and native plant propagater, and I run my own native seed business called Klamath-Siskiyou Native Seeds. The health and integrity of BLM lands directly impacts both my personal and professional experience while using BLM public lands. As a long-time resident of Southern Oregon and the Klamath-Siskiyou bioregion, my perspective is through the lens of high botanical diversity, intact native ecosystems, and wild, clean rivers that the Medford District BLM has to offer.

Western Oregon's BLM land is renowned for their salmon, steelhead, botanical diversity and wildlife. My personal use of BLM land in Oregon spans the state, but I am most familiar with, tied to and attached to the lands that the Ashland and Grants Pass field office manage. These areas have amazing watershed and recreational values that are important to me, as well as the general public, including those that may not have the time to write an in-depth comment on the Draft EIS for the RMP.

General Comment on the DEIS

- The way the alternatives have been put together for the DEIS makes it difficult to access individual components of each alternative. It is clear that the BLM does not plan to pick one of the alternatives, rather components from each of the alternatives, and therefore, as a reader of the DEIS, I am perplexed by how you assembled the alternatives in the first place, as they essentially have no meaning or cohesion. You are simply throwing possible ideas out there, but the alternatives themselves have no actual purpose in and of themselves. I think you need to rethink the structure of the alternatives and present viable alternatives that don't have such discordant paths. NEPA's purpose is to help determine the different choices among alternatives. I believe the analysis must be redone to better highlight the

relevant differences among alternative, so the public can make better informed choices and comments in regard to each alternative as a whole, rather than piecemeal.

- After having attended numerous BLM meetings/presentations regarding the RMP process, I found the analysis behind the BLM's justification for increased logging and clearcutting very flawed. The "modeling" of forests in a computer does not, will not, and cannot accurately predict actual outcomes in real life, in real forests, in wild nature. Modeling is inherently flawed and it is acknowledged that what one sees in a computer model may not translate correctly in a natural ecosystem full of diversity and unpredictable events that modeling cannot account for. Computer modeling is not a substitute for on-the-ground data and real life experience. I think the BLM needs to rely less on computer modeling and more on on-the-ground data.

#### Water Quality

- BLM forests and watersheds provide drinking water for hundreds of thousands of Oregonians. From rural homesteads and rural businesses, to urban homes and businesses in the wildland-urban interface, Oregonians depend on intact, healthy forests to provide the clean water that we expect from our public land.

#### Carbon Sequestration and Ecological Services

- These forests sequester vast amounts of carbon that helps fight climate change. The RMP should not be increasing logging in a time that humanity's existence depends on the carbon sequestration provided by healthy forests.
- These forests provide ecological services that far outweigh any benefit from logging, mining or other resource extraction.
- It is estimated that 4 tons of carbon dioxide per acre, per year are emitted from cutting down forests. If we continue to log or increase logging we will exacerbate climate change, rising oceans and global insecurity.
- If you cut a 100-200-year-old tree, you can't get the carbon sequestered again for another 100-200 years. This makes keeping older forests that much more valuable.
- The DEIS should include the associated cost of cutting down trees with the increased contribution of carbon into the environment. The DEIS should include a recommendation for a carbon tax on logging older forests on BLM land in Oregon.

#### Applegate Adaptive Management Area

- Maintain the Applegate Adaptive Management Area (AMA)! As a resident of the Applegate River watershed, I know how useful the AMA could — and should — be to developing and testing innovative forestry and land management techniques. If the BLM does not allow for innovation it will be stuck in the past, using outdated and irrational land management methods that may do way more harm to native ecosystems than could be imagined.

The BLM needs to be adaptive and flexible in order to truly do the land justice. Residents of the Applegate Valley are in full and total support of the AMA, so why do away with something that the BLM could use as a tool to reach out to a community committed to innovative forestry techniques. As a community that values land stewardship, ecological restoration, outdoor recreation, sustainable, small-scale timber production, prescribed fire and collaboration with the BLM, there is more to be gained from the AMA than there is to be lost if the BLM were to end the designation. The AMA has never been used to its full potential and should be enhanced, not ended. Many projects in the Applegate have been collaborative in nature with the BLM and community members, something that Applegate Valley residents appreciate and value. The recent development of a Community Alternative for the Nedsbar Timber Sale in the Little Applegate Valley is a case in point. If the BLM is truly committed to community engagement and innovative forestry/land management techniques, you will keep the AMA and develop the idea further.

#### Survey and Manage

- Maintain Survey and Manage. The DEIS does not provide a compelling rationale for doing away with Survey and Manage. The BLM will adopt a very narrow purpose and need if the proposed cut to Survey and Manage happens, focused only on recovery of ESA-listed species. The exclusion of other, non-listed species will go against the Northwest Forest Plan's goal of keeping wildlife off of the list. BLM cannot avoid their duty to protect wildlife and rare plants and avoid analyzing the effects of failing to protect wildlife and rare plants.
- The Survey and Manage program contributes to a deeper understanding of how forest ecosystems work, by looking at specific organisms within that broader system. This detailed ecological knowledge would not be possible without consistent surveys in the field. If the BLM drops the Survey and Manage program it will drop its ability to contribute to science and long-term data collection that can truly inform management decisions, much better than any computer model can. Don't drop this crucial program that adds to human understanding and education about native ecosystems. You cannot put an economic value on the knowledge gained from Survey and Manage. It is priceless!
- Protect Pacific fisher under Survey and Manage. The DEIS states that the "BLM did not forecast population trends of fisher, because a quantified relationship between the specific number of individuals and the availability of habitat is unknown." This is ridiculous. You don't even have real data and you are deciding to cut the one program that helps inform and educate about this uncommon species? This is absurd. How can you help recover this species if you don't even know what's out there on BLM lands? An analysis is needed to identify lands with high habitat value for the fisher as proposed, but analysis also needs to identify where specific conservation actions are

needed. Some specific protections would be to protect all snags, live trees >32" dbh since these are used for denning. Fuels treatment projects are in conflict with fisher preferred habitat and analysis is needed to ensure that cumulative fuels treatment impacts do not harm fisher habitat. Fishers prefer undisturbed riparian areas. The robust riparian reserves in the no action alternative would best meet the needs of fishers and this conservation needs to identify for fishers.

- Protect the Siskiyou Mountain Salamander under Survey and Manage. Implementation of the action alternatives in the DEIS would undermine several key elements of the 2007 SMS Conservation Strategy that were deemed necessary in order to "maintain well-distributed populations" of the Siskiyou Salamander and "avoid a trend towards listing under the ESA." The Conservation Strategy indicates that it rests upon the reasonable assumption that "clearcut logging is no longer carried out on Forest Service or BLM lands within the range of this species." The RMP DEIS renders this assumption invalid, and therefore, the Survey and Manage should not be cut.

#### Late Successional Reserves

- Expand Late Successional Reserves (LSR) to protect critical habitat and habitat connectivity. LSRs provide critical refugia and dispersal for organisms of all kind. Maintenance of current old growth forests within LSRs is critical as humans face climate change. As the climate changes, species that are rare today could become much more important tomorrow. Conserving survey and manage species helps ensure that ecological processes will continue under changing conditions. LSRs are crucial for plants, animals and humans. Old growth forests are the cornerstone that forests depend on for good genetic inheritance and resiliency.

#### Aquatic Conservation Strategy

- Maintain Aquatic Conservation Strategy (ACS). There is no coherent reason set forth in the DEIS as to why the BLM feels there is a need to do away with the ACS. The ACS is critical in the recovery of salmon and steelhead, along with the aquatic ecosystem as a whole. In an era of increased strain on water resources and climate change, having the crucial restraints of the ACS are imperative for aquatic conservation, indeed the ACS has proven to help improve water quality. It would be asinine to do away with the ACS.
- Do not reduce streamside buffers. These buffers are critical for the recovery of our desperate anadromous fish, and coho salmon specifically, that need way more protection than they are currently getting in order to recover their numbers to a sustainable and healthy number. I am concerned that the DEIS emphasizes forestry classifications that are explained to be concerned with spotted owl recovery — for example the difference between wet and dry forest — while mostly ignoring the need for protection of riparian forests to recover coho salmon. The BLM needs to give coho salmon as much protection and emphasis in the DEIS as the spotted owl. BLM must not reverse the

policy decision to protect wide stream buffers absent a clear disclosure of a competing rationale in the DEIS and disclosure of the adverse effects of reduced protection for streamside forests.

- Do not minimize green tree and down wood retention standards.

#### Key Watersheds

- Likewise the BLM should not abandon protections for key watersheds for these same reasons. Spotted owls, marbled murrelets, and Pacific fisher all use key watersheds as well as coho salmon. All these imperiled species need increased protections to survive and thrive. Additionally, I recommend that the BLM eliminate grazing along occupied coho critical habitat.

#### Clearcut Logging/Regeneration Harvest/Sustained Yields

- Clearcut logging does not belong in the modern lexicon. The fact that you are even thinking about implementing clearcut logging again is unbelievable considering the science that shows how clearcutting negatively impacts hydrology, erosion, species diversity, fire safety, and wildlife.
- The DEIS shows that regeneration harvest is not needed to restore early seral-habitat. Early seral habitat is already over-abundant, full of fine fuels that are a fire hazard, and are likely to increase in the future as a result of climate change. Regeneration harvest is not needed for “community stability,” as the DEIS admits, because the timber industry is unstable and unpredictable and this instable market will actually reduce not increase community stability. Regeneration harvest is not needed for fire hazard reduction, because, as the DEIS shows, young forests resulting from such logging have higher fuel loads and are more hazardous than older, mature forests.
- Sustained yield according to the O&C Act: sustained yield is sought “for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities.” The BLM should focus its analysis so that these specific purposes are the primary focus, and sustained yield is secondary, not primary. Should you choose to keep it primary you will degrade watersheds and increase the likelihood of high-severity fire in the future.
- Forests do not need human intervention to be healthy. Forests have evolved for millennia to rely on natural disturbance such as fire and disease for renewal and rejuvenation. I am not of the zero-cut philosophy, as I feel humans can use some locally sourced wood products sustainably as byproducts of true forest restoration work, but I do believe that the more managed and industrialized forests become unhealthier and less resilient they become. With further threats of climate change and other anthropogenic threats on the horizon, it would behoove us, as humans, to err on the side of caution and leave older forests for the future, and allow for natural disturbance within those old-forest ecosystems.

- Under the O&C Act, O&C lands “shall be managed . . . for permanent forest production,” however, they are also subject to other constraints; permanent forest production is not synonymous with commercial logging. Commercial logging is just one use, whereas the O&C Act also mandates for forests to protect watersheds, stream flows, or recreation as well. Smartly, Congress clearly did not support maximizing timber production for short-term economic gain when defined the rules for managing O&C lands, and neither should the BLM. You need to take the needs of local communities into consideration. Most logging towns are doing very poorly, whereas towns that have recreation-based economies are doing much better economically.
- Court rulings have held that the BLM must comply with many other laws, in addition to the O&C Act, even if the effect would be one of reducing the amount of timber that can be produced on O&C lands. When Swanson Superior sued the BLM, the court held that timber industry Plaintiffs do not have standing to bring a claim against BLM for failing to offer 500 MMbf of timber per year. Clearly the BLM has the legal standing to reduce timber production where it is appropriate for local communities and for the health of the land and water.

#### Road Construction

- Do not increase road construction. There are already way more roads in the BLM road system and you cannot maintain what you already have. BLM already has a \$317 million-dollar deferred road maintenance backlog of which \$127 million is within the Medford District. There isn't enough money to keep roads up to standard, and therefore the roads create problems with erosion and negatively effect hydrological function. Roads impact wildlife movement and migration and the more roads we have, the more dissected and disconnected the remaining precious habitat left will become. All areas designated Lands with Wilderness Characteristics in the RMP process should be designated as Wilderness Study Areas. These areas need protections beyond just being recognized for what they are: wild. The BLM needs to manage these areas in a way that will retain their wilderness characteristics. The BLM needs to protect the few wild and roadless areas left on Oregon BLM land. These areas are crucial for the retention of intact native plant communities; they are examples of what unmanaged landscapes can look and function like; they are the best places for non-motorized recreation; they provide solitude for the public unlike any other landscape; they protect wildlife and rare plants; they help maintain good water quality; they are refugia for wildlife; they are valuable for carbon sequestration; they provide a reference point for ecological research; they are great for birders and botanists.

#### Recreation

- The RMP itself recognizes that recreation is the most common way that Oregonians experience BLM lands, and that recreation also provides the

greatest economic benefit to our local communities. It is important that the recreational opportunities are not diminished in this new RMP, and that the quality and quantity of recreational experience on BLM land is increased for future generations.

- As shown on Table 3-126 (page 448) of the DEIS, there are currently three times as many participants interested in wildlife viewing and nature study on BLM lands than in motorized off-highway vehicle travel. Similarly, driving on existing BLM roads, camping and picnicking, non-motorized travel and hunting all draw more than one million participants yearly and significantly exceed the demand for motorized ORV travel. In the Medford District the demand for non-motorized recreation compared to OHV use is even more pronounced. Page 462 of the DEIS projects 85,000 hiking trail users at sites within 30 minutes of Medford and only 18,589 ORV visits in the same area. Within an hour of Medford the BLM anticipates 137,371 hiking visits and only 30,041 ORV participants. Please note that page 493 of the DEIS clearly establishes that “the most common outdoor recreation activities, requiring the least equipment or specialized skill, have the greatest participation numbers, and...provide the greatest total net benefit.” Given that the public prefers non-motorized recreation and that it provides the most social and economic benefits, it is arbitrary and capricious for the BLM to continue to emphasize OHV use on tens of thousands of acres of public lands to the detriment of terrestrial and aquatic forest resources, neighboring landowners and other forest users.
- The RMP needs to do more to create a larger non-motorized trail system on BLM lands. Trail maintenance funds need to be appropriately allocated.

#### OHV Management

- You need analyze, document and monitor all OHV routes currently on BLM land. All user-created OHV routes should be reviewed and subjected to NEPA, just as hiking, non-motorized trails are. In my opinion no user-created OHV routes should be approved for use. This only justifies and sanctions illegal activity on BLM land, giving BLM’s approval for OHV enthusiasts to “take matters into their own hands,” and create illegal trails wherever, whenever, and in whatever way they choose. Continuing to sanction user-created OHV routes is a bad precedent that you need to end now and nip in the bud while you still can. The inequity and disparity of treatment that the BLM has in regards to OHV use is astounding: OHV users can make trails any time they like, while non-motorized hiking trail advocates must pay for and go through the lengthy and costly NEPA process.
- Prohibit OHV use in 5th field coho watersheds. Designate them as “closed” and prioritize law enforcement, physical barriers, signs, monitoring and outreach in these watersheds.
- The DEIS does not disclose or analyze the foreseeable impacts of illegal ORV use, instead the DEIS claims that “the BLM does not have a basis for predicting the location or effects of any wide spread or systemic illegal OHV

use.” The DEIS is not telling the truth here. In fact, if the BLM were to look at and analyze past illegal OHV impacts, it is reasonable to assume that these same sites that have been repeatedly trashed by OHV users will be trashed out and shot up again. The DEIS ignores the desperate need to create an OHV enforcement strategy rather than relying on a strategy of user compliance that has been proven ineffective. BLM must consider alternatives that consider closing more than a very small fraction of the planning area to OHV use.

- Please take note of the detailed work of Luke Ruediger, an Applegate Valley resident who documented, monitored, and wrote a lengthy report about illegal OHV use on the Medford District BLM. Luke’s project was funded through crowd sourcing, showing the community support for increased OHV monitoring and enforcement. Luke’s report can be found at the following link:

[https://drive.google.com/file/d/1Oo\\_nitoring\\_Report\\_d1](https://drive.google.com/file/d/1Oo_nitoring_Report_d1)

#### Timber Economy or Recreation Economy?

- 2015 has shown that Oregon is not as dependent on timber for economic security as we were before. Times they are ‘a changing, and the BLM should keep up with modern trends. Timber’s share of Oregon’s GDP is declining rapidly. In 1963 wood products were 12% of the GDP. In 1983, they were 6%. In 1999, 2%, and in 2007 wood products were a paltry 1% of Oregon’s GDP. So why is the BLM so reluctant to acknowledge that Oregon doesn’t need timber to have a robust economy. Counties that are unwilling to increase taxes to make up for the loss of federal timber receipts are responsible for themselves. Currently the timber industry’s ability to leverage economic growth is small.
- Timber jobs have shrunk for decades. 1950s: 60,000-90,000, 1980s: 50,000-80,000, and 2014: approximately 30,000. Stats provided by Lerner J. 2012, Oregon Office of Economic Analysis.
- Timber dependent communities correlate with reduced social wellbeing. According to the National Research Council, “In most cases timber dependency seemed to hurt rather than help communities.” Higher unemployment; lower income; more poverty; lower levels of education; older, lower-value housing; lower birth rates; higher death rates.
- Out of Oregon’s 1.7 million jobs, the outdoor recreation industry has 140,000 of those jobs, compared to a paltry 25-30,000 timber industry jobs.
- Amenity-driven growth in Oregon has a net migration rate. People want to come to Oregon for the quality of life that clean water, healthy forests and recreation have to offer, not for clearcutting and unstable timber jobs.
- High tech jobs in Oregon average \$100,000 and contribute 120,000 jobs to the economy, whereas lower wage timber jobs currently only contribute around 25-30,000 jobs.

## Impacts to Fuels and Fire Risks

- Proposed BLM timber management in the DSS will increase fire and fuel hazards in western Oregon forests. The proposal to increase even-aged, regeneration harvesting on public lands is irresponsible and will significantly increase fire/fuel hazards throughout western Oregon. Heavy canopy reductions in dry forests and the “skips and gaps” treatments proposed in the RMP will also increase fire hazards, fuels, and fire/fuel management concerns in southern Oregon. The RMP admits that many of the alternatives provided in the DSS will increase fire and fuel hazards by increasing logging slash, encouraging young age classes less resilient to fire and even-aged forest management. The proposal is contrary to the goals of community safety and forest resiliency, especially given the nature of BLM lands in western Oregon and their proximity to communities and rural homes. Even the cost of fighting fire in this modern era and the threat that fire poses to rural and urban communities in western Oregon, no alternative that increases fire/fuel hazards should be considered. This is, simply put, the largest forest management issue of our time.
- The future of our forests, our local timber industry, and many important wildlife species including endangered northern spotted owl and coho salmon may depend on our ability to manage wildfire and fuel hazards in the era of climate change. Many communities will be impacted by increased fuel hazards and fire management concerns due to BLM logging proposals. To knowingly increase fuel hazards in western Oregon is arbitrary and capricious. It is also unjustifiable economically when the cost of wildfire suppression and increased fire severity associated with BLM logging practices are taken into account. Increasing fuel hazards through discretionary management actions and decisions could be seen for what it is: the abandonment of rural communities and commitment to community protection needs.
- Plantations and even-aged forests, filled with “regeneration” and choked with logging slash are the most flammable and dangerous forest fuels, yet the DSS is proposing an increase in logging practices that promote these conditions. The presence of plantation forests and relatively even-aged forest regenerating from overstorey removal, shelterwood harvesting, clearcut/regeneration logging, variable Retention Regeneration harvest and heavy commercial thinning can increase fire severity and overstorey mortality in wildfire events. Overstorey removal and heavy canopy reduction can create shrub response, increasing understorey fuels in the years following treatment. This is especially true in the drier, more fire adapted forests of southwestern Oregon. The result is an increase in fuel hazards, including an increase in the density and continuity of live, wood understorey fuels. This creates excessive fuel ladders that threaten the remaining forest canopy or retention aggregates. Fine understorey fuels will also increase within treated stands following treatment. Logging slash, especially fine, slash-downed wood material will also increase due to

proposed logging practices. Both shrub response and increases in fine fuels can be attributed to heavy canopy reduction. The increased sunlight and soil disturbance associated with logging create these results. The subsequent increase in sunlight and exposure to drying winds will dry understory fuels, decrease fuel and soil moisture levels, fan the flames of wildfire, and increase drought stress due to impacts to forest canopies and micro-climate. The result will be increased fire severities and extended fire seasons, as well as increased fire severity and decreased community fire safety.

- Contrary to industry rhetoric, increased logging across western Oregon will only compound current wildfire concerns. Shortened regeneration logging rotations will only compound the problem even further by encouraging a larger percentage of young age classes and more even-aged, uniform forests that are highly susceptible to fire. With these forest types embedded within and adjacent to late seral forest fragments and LSR reserves, increased mortality in late seral forest types would be expected. This has negative implications that were not analyzed in the DSS. Increased mortality in late seral forest associated with the logging practices and their relationship to fire will negatively impact northern spotted owl, coho salmon, water quality, forest connectivity, wildlife habitat, watershed health, and future wildfire resiliency.
- A new emphasis is needed and should be proposed in the FMS as a viable and reasonable alternative. This alternative should focus on fuel reduction, not canopy reduction, prescribed fire, community protection, and restorative fire management.

#### Salvage Logging

- The RMP should have no allowance for salvage logging after wildfire. The cost of salvage logging far exceeds the benefit and makes us all worse off.
- There is a net loss in carbon sequestration due to salvage logging, whereas studies have shown that even in the large Biscuit Fire of 2002, the carbon it emitted into the air was still less than the carbon emitted from all logging in Oregon that same year.
- Salvage logging damages the fragile post-fire ecosystem that is crucial for many species in our fire-adapted forests in Southern Oregon.

Sincerely  
Suzie Savoie  
17607 Elliott Creek Rd.  
Jacksonville, OR  
97530

## Jasmine Benjamin

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**From:** fpaulete@blm.gov on behalf of RMPWO\_Comments, BLM\_OR  
<blm\_or\_rmpwo\_comments@blm.gov>  
**Sent:** Saturday, August 22, 2015 11:48 AM  
**To:** RMP-Comments@heg-inc.com  
**Subject:** Fwd: RMP's for West Oregon

----- Forwarded message -----

**From:** Linea Gagliano <[linea@traveloregon.com](mailto:linea@traveloregon.com)>  
**Date:** Fri, Aug 21, 2015 at 4:44 PM  
**Subject:** RMP's for West Oregon  
**To:** "[blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)" <[blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)>

Dear BLM,

Thank you for the opportunity to comment and share our thoughts on the proposed alternatives for resource management in western Oregon.

We understand and appreciate the economic impact that timber can bring to Oregon's economy. We also find that many communities throughout Oregon are turning to outdoor recreation and tourism as a vital economic multiplier. A diversified economy is crucial for the health of Oregon's communities. With that in mind, we want to make sure we maintain the state's scenic areas and viewsheds where visitors and residents seek out recreational opportunities.

Travel and tourism is an important economic driver and job creator for Oregon. The outdoor recreation economy is a key pillar in the tourism economy. In a Longwoods Visitor Profile study from 2013, it shows that 23 percent of visitors to Oregon say the outdoors is the main purpose of their trip. Only 14 percent of visitors seek the outdoors nationally, showing that Oregon has a distinct edge in attracting traveler dollars to the state due to our natural scenic splendor. And, that 23 percent adds up to huge economic impact for the state. The travel and tourism industry generates \$10.3 billion for the state's economy and directly employs more than 101,000 Oregonians. Bicycle tourism alone injects more than \$1 million a day into the state's economy, bringing in at least \$400 million every year.

In rural Oregon, travel and tourism is an essential industry to keep communities economically viable and vibrant. Overall, the travel industry is one of the three largest export-oriented industries in rural Oregon counties.

It's important we take into account the need for lands that are set aside for recreational purposes and maintain riparian zones to preserve the trails and infrastructure necessary for outdoor recreation. The role we play in the

lands today will help preserve and maintain Oregon's unique natural landscapes that support and grow travel and tourism and contribute to the health and development of the many communities throughout the state that depend on it.

## Linea Gagliano | Manager, Industry & Public Affairs

Travel Oregon/Oregon Tourism Commission

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RideOregonRide.com

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**From:** [eflc](#)  
**To:** [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)  
**Subject:** our forests  
**Date:** Tuesday, July 21, 2015 11:21:55 AM

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Dear Forest Managers,

As a resident of Coos County and owner operator of small sawmill I would like to comment on the your proposed Forest Plan revision. I find that once again you have failed to realize the importance of small scale manufacturing to the economic and social well being of our rural communities.

Your plan leaves out the small players and us who provide much needed employment and infrastructure for our rural communities.

You need a strong small sale programs that sells a wide variety of trees. This should include old growth salvage and hardwoods across your entire landscape.

With cooperation between our rural citizens and the BLM's extremely valuable wood resource you should be able to make our rural communities economically viable and

forests sustainable. This plan does neither. I believe you need to actively manage all your forest lands to insure that our children can have forests and their resources to enjoy and benefit from for generations to come.

The current Northwest Forest Plan have been a disaster for our forests and our rural communities. I can't see how this plans helps.

I would like to see more small sales of uneven aged trees including trees older than 80 years.

Sincerely,

Bob Sproul,

PO Box 275

Myrtle Point, Oregon, 97458

**From:** [Ernie O'Byrne](mailto:Ernie O'Byrne)  
**To:** [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)  
**Subject:** Comments on proposed Wolf Creek Environmental Education Site and Trail, p. 1280 E.I.S.  
**Date:** Tuesday, July 07, 2015 9:51:12 AM

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are writing in enthusiastic support of acre Wolf Creek Environmental Education Site and Trail, proposed in Alternative of the . . . . . Although we do not support Alternative as a whole, we hope this piece of Alternative will be included in the final Resource Management Plan. The Wolf Creek Environmental Education Site and Trail is located in , currently designated as State Accessional Reserve. The site includes a small, beautiful old growth forest near Cro , eneta, and gene. It is possible the old growth forest closest to gene. It has

near old trees  
di diverse ages of younger trees  
big Douglas firs, western red cedars, and western hemlocks  
diverse understory of shrubs, herbaceous plants, mosses, and ferns  
habitats suitable for spotted owl and marbled murrelet.

One part of the old growth forest is a narrow slice between Wolf Creek Road and a timber road to the north. Some of the oldest trees and most intricate understory are here. This part is easily accessible when hiking and there is roadside parking on the logging road. Steeper area north of the timber road goes downhill to Wolf Creek. These two areas of the forest, known as the Grandmothers' Roam, comprise acres and are nominated as an CCC in Alternatives and es and C and es a of the . . . .

Further south in section , there is another part of the forest, Timber Ridge, accessible from a timber road south of Wolf Creek Road. This area has more level ground and the trees there are not quite so old. It is home to ghost orchids. The ridge lies between the Wolf Creek and its watershed. Trees slopes south of the ridge are older and include many sites suitable for spotted owl and marbled murrelet.

Kate assert from Lane Community College and other teachers have been teaching their students about Oregon forests and bringing them on field trips to the Wolf Creek Environmental Education Site for over a decade.

The students are amazed and delighted by the forest. They learn a great deal there and gain a deeper appreciation and respect for Oregon forests. Neighbors and other interested people visit the site as well. Students return and bring their families. Informal trails, trimmed, slightly widened deer trails lead past ancient trees, snags, nurse logs, and Deer Creek .

We believe it is important to have an Environmental Education Site in the Coast Range and west of gene.

With gas prices uncertain and concerns about global warming, legislators' concerns about travel time and distance, it would help mandated educators and students to have an Environmental Education Site easily accessible to educational institutions in and near Crook, eneta and west gene. We also think it is important for students to have an Environmental Education Site that is near where they live, not a place that they travel a long time to get to, once a year if they are lucky. Far from a forest they visit may have much the same ecosystem as forests near home, but to students, it doesn't feel like their own neighboring forest, and they can't get there easily or often enough for significant Environmental Education to take place.

Environmental Education Sites are also a way that . . . . can give to the local community. Sites offer CCC goals, and the issue of renewable for rural communities, when forests are cut on . . . . land, it takes a beautiful, natural, recreation, carbon sequestration, and wildlife habitat from the environment and the people who live nearby. An Environmental Education Site gives something real and lasting to the community. The opportunity for children and adults to learn from the presence and complexity of an old growth forest near their homes.

We hope that this lovely, easily accessible old growth grove, which we have visited several times, ourselves, can remain growing as it is as an Environmental Education Site and Trail, for the benefit of new generations of students and for visitors from the neighborhood and beyond.

incerely ,

Ernie and Arietta O'Byrne  
North Estacada River  
Central Rd  
Gene OR

[www.blm.gov](http://www.blm.gov)

**From:** [Brad Peterson](#)  
**To:** [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)  
**Subject:** Please add more mountain biking trails!  
**Date:** Thursday, June 18, 2015 7:50:33 AM

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Dear BLM – The public PLM lands are a wonderful resource paid for by my tax dollars. I am an avid outdoorsman and enjoy camping, fishing, and mountain biking with my friends and family. The BLM has done a lot of great things to encourage these activities and I encourage you to add and promote more back-country mountain bike trails. This low-impact activity get people into the woods, promotes spending tourism dollars in more remote areas, and benefits the health and well-being of BLM stakeholders. Most trail building work and maintenance would be done by volunteers with proper planning and authorization.

Thank you,

Brad Peterson, Owner  
Superior Glass Works  
*High Performance Composites & Fabrication*  
503-829-9634 (shop) 503-830-3042 (cell)  
[brad@superiorglassworks.com](mailto:brad@superiorglassworks.com)  
[www.superiorglassworks.com](http://www.superiorglassworks.com)



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[www.avast.com](http://www.avast.com)

**From:** [David Norris](#)  
**To:** [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)  
**Subject:** resource management plan  
**Date:** Tuesday, June 09, 2015 11:00:36 AM

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Hello,

I am writing to comment on the proposed resource management plan and its alternatives. Specifically, these 2 quotes from the plan itself:

The annual harvest value of timber, compared to \$23 million in 2012, would increase under all alternatives; from \$37 million under Alternative D to **\$135 million** under Alternative C.

and:

All action alternatives would increase the acreage closed to off-highway vehicle use and decrease the acreage open to off-highway vehicle use when compared to the No Action alternative.

I vehemently disagree that pumping out as much timber as possible should be the top priority. It's time to stop selling out future generations to make a quick buck. It's quite pathetic when the most conservative option almost doubles the timber sales. What is going to be left? There are millions of acres of private land that can be sold for timber, and it's impossible to go anywhere on BLM land in this state without seeing countless scars from clear-cut timber operations. It's truly disgusting.

Recreation on the other hand, should be much more important. It's one of the few activities that doesn't have a significant downside, and in fact most people who camp/fish/OHV are very responsible and leave the place better than they found it. Volunteer recreation enthusiasts are responsible for most of the cleanup of the parks. We are doing your jobs for you, yet are completely unimportant in your plans. This is wrong.

Stop selling out our timber, protect the precious resources that you have been put in charge of, and invest more in recreation and particularly OHV trails.

Regards,

David Norris  
Owner, Fourth Wave Consulting  
<http://www.fourthwc.com>  
503.734.6150

**From:** [James Bleuer](#)  
**To:** [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)  
**Subject:** Resource planning  
**Date:** Monday, July 06, 2015 10:49:41 AM  
**Attachments:** [image001.png](#)

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Hello,

I just watched the video asking for input to the planning process, and am writing to request more singletrack biking access in Western Oregon. There is a lot of land in this area that is best explored by bike, and the bike community has proven they are respectful, clean, and willing to invest time and effort into building trail systems such as Sandy Ridge, with BLM as a partner.

Further, where possible the separation of horse and bike trails is ideal, as horse traffic can have a negative impact on the type of trail conditions that make riding possible.

Thanks,

**James Bleuer**  
Renewable Resources

Sandy Ridge Cell Resources, C  
PO Box 1000, Sandy, OR  
P 503.754.1111  
www.bridgewellresources.com

 **BRIDGEWELL**  
RESOURCES™  
[www.bridgewellresources.com](http://www.bridgewellresources.com)

**From:** [Ethan Furniss](#)  
**To:** [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)  
**Subject:** Wildcat Creek Trails  
**Date:** Wednesday, July 01, 2015 12:23:37 AM

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To whom it may concern,

The Wildcat Creek Trails are unique to the scope of mountain bike trails because they are 1. downhill specific and 2. on the challenging end of the spectrum of difficulty. This is essential to the community here. Without a little bit for everybody people lose sight of the other declines and how far people can take cycling in terms of skill and endurance.

Please realize the need for a riding area designated for downhill oriented trails.

Thank you.

Ethan

--

**Ethan Furniss**

[ethanfurniss.com](http://ethanfurniss.com)

Oxford Products | Dumonde Tech Racing Oils | Spider Grips | Chatterbox USA |  
Nutcase Helmets | Global Vision Sunglasses  
916.799.8024  
@etharfurning

**From:** [Jim Karn](#)  
**To:** [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)  
**Subject:** Wildcat Mountain Bike Trails  
**Date:** Tuesday, June 09, 2015 10:28:52 AM

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The mountain bike trails at Wildcat are an extremely valuable resource. They are the best example of technical, downhill-oriented trails in the entire Northwest. They provide a unique recreational opportunity for a constantly growing user group that desires steep, challenging terrain.

They are also historically significant as they were the first trails of that style in the area. Numerous riders from throughout the world visit every year including some of the most famous professionals in our sport.

I live in Bend, OR and I travel to Wildcat several times every year because there are no similar recreational opportunities in Central Oregon. I urge you to preserve and protect these precious trails.

Best Regards,

**Jim Karn**

Metolius Climbing  
63189 Nels Anderson Rd.  
Bend, OR 97701  
tel: (541) 382-7585  
fax: (541) 382-8531



**Umpqua Coquille**LLC  
SUSTAINABLE FORESTS

Aug 21, 2015

[blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)

RMPs for Western Oregon  
Attn: Mr. Jerry Perez  
State Director for Oregon and Washington  
Bureau of Land Management  
PO Box 2965  
Portland, OR 97208

**Re:** Western Oregon BLM Resource Management Plan and Draft Environmental Impact Statement

**Dear Mr. Perez,**

Thank you for providing this opportunity to provide input on the new Western Oregon BLM Resource Management Plan and Draft Environmental Impact Statement (“The DEIS”). Several comments follow.

BLM forest lands, across Western Oregon should always contain approximately 10% Natural Early Seral forest, assuming that early seral lasts until 30 years of age on the average. This conservative estimate is based on Swanson (2012), who places the range of early seral between 5 and 20%. One of the main reasons why early seral on BLM lands is important, is that current herbicide practices and reforestation densities on private lands have radically altered early seral habitat there, in the last decade or two. **Natural early seral plant species** can be observed to be in short supply in the watersheds of the BLM landbase despite the abundance of early seral land in these watersheds.

For example, grasses are observed to be the predominant cover in the Coast Range early seral on private land. The role of natural early seral on BLM landscapes plays a more important role these days, in the overall ecology of Western Oregon forests. This role is not discussed in The DEIS in the section starting on page 683, but it does relate to the forest hydrology, which is related to the volume of clean water in watersheds. The low amount of natural early seral on BLM lands is also due to the lack of regeneration harvest of timber in the last two decades, which has impacted species which depend on early seral habitat. It is commonly observed by foresters such as in the Coast Range, that bears are eating more and more bark of 15-30-year old trees than they did historically. Biologists tell me this is a learned behavior. It is interesting to speculate if the bears had blackberries, huckleberries, and other early seral species to eat, would they still go after the tree bark?

836 W. Military Av -- Roseburg, OR 97471 -- [rsohn@umpquacoquille.com](mailto:rsohn@umpquacoquille.com)  
C 541 430-6912 -- H 541 673-4222 – F 541 673-2180

RE the Nonaka and Spies (2005) paper on seral stage information (see page 683 ff of The DEIS.) This research paper is cited in The DEIS, but the discussion of early seral in the 2008 Western Oregon Plan Revision DEIS, is included in The DEIS only by reference to the 2008 DEIS. The context of the 2008 discussion is missing, misleading the reader into thinking that the Nonaka and Spies paper is representative of Western Oregon, when in fact it is only representative of the Coast Range Province. The Nonaka and Spies paper addresses the Coast Range province only and pegs early seral at 5%. Swanson (2012) suggested the range for Western Oregon is between 5 and 20%. It would be theoretically possible to repeat the methodology of Nonaka and Spies (2005) for all of Western Oregon, or some specific area such as the dry forest provinces. Absent such an analysis, extrapolation of the Nonaka and Spies data to the entirety Western Oregon appears flawed.

“Regeneration harvest with variable retention areas” is a superior term to “variable retention regeneration harvest” because it implies measurable components. Regeneration harvest should refer to the measurable acreage of the landscape that is converted to early seral by harvest, and Variable Retention areas should be the measurable areas of canopy cover within the Harvest unit boundaries. These quantifiable terms would provide clarity to the harvest practices on BLM lands. This change would support the purposes of providing a sustained yield of timber, and the Conservation of Threatened and Endangered Species, by indicating the acreages harvested and reserved, and contributing to these respective categories. Following the ideas of the structure-based management work of Chad Oliver, which are well-known, the regeneration harvest acres, within the areas of regeneration harvest with variable retention areas, should have no more than 6-10 dispersed trees per acre. This low density will allow intolerant species such as Douglas-fir to regenerate and reach maturity while at the same time competing with the legacy trees.

There is a subtle inconsistency in the Purpose and Need. Page 7, describing large contiguous blocks of late successional Forest, does not expressly call for fixed reserves, yet the alternatives themselves have varying sizes of fixed reserves. Although it acknowledges that other alternatives proposed in the past failed without fixed reserves, these past experiences are not necessarily a good predictor of the future because modeling is more sophisticated, and forests have grown and will continue to grow in the future. It is possible to create large contiguous blocks of late successional forest, without drawing lines around them and calling them reserves. The forest would be better suited to management that allowed entry of the late successional forest for the purpose of improving the late-successional habitat. There is a growing body of scientific information that indicates that fixed reserves are not necessary for owl populations and other old-growth dependent species. The current Alternatives have not explored managing the large blocks under the principles of sustained yield which can provide and maintain late-successional forest at the landscape scale.

Wildlife Biologist Barry Noon (in Spies and Duncan, 2009) wrote, “Because of the dynamic nature of forested ecosystems, the location of old-growth forests will change through time, and new reserves may be required to replace those lost through natural attrition. As a consequence, zoning of the landscape into a system of reserves and nonreserves may not be a successful long-term conservation strategy. To plan for a target amount of old growth with

spatial distribution changing over time requires that the forest be viewed in its entirety as a spatially dynamic system.”

Norm Johnson and Jerry Franklin (2013) recommend “shift(ing) portions of late successional reserves to sustained yield management” in moist forests. In dry forests: “Don’t create large reserves in which harvest is prohibited, since that will increase the probability that the forests within them will not survive.”

Steven Courtney (2015) argues for maintaining well distributed habitat across the landscape, rather than only in reserves. Concern is expressed about the effect of fire and the usefulness of active management to preserve habitats. “Significant support” from the scientific community is expressed for “long-rotation, ‘light touch’ and adaptive processes.”

The average O&C revenue for the last 50 years, in 2011 dollars, was \$134 Million (according to data from the O&C Counties). The 2028 projected revenue range of these alternatives, from \$18 million to \$66.5 million (preferred alternative at \$34 million, are less than 50% of the historical average. These numbers are so low that they do not represent the full range of alternatives required under NEPA for consideration. This is a violation of the mandate of the O&C Act to manage these lands to generate revenues for the benefit of rural counties

The Maximum Sustained Yield is not calculated in The DEIS based on the 2014 data. This historical benchmark was pegged 1.2 Billion Board Feet per year in 2006. Given the lack of harvest since the last estimate, it could be reasonable to expect that for the 2014 inventory, the Maximum sustained yield could be in the 1.4 billion board feet per year range. The Maximum Sustained Yield serves as a benchmark to relate to timber harvest for context to evaluate the current Alternatives which were determined with updated data. Knowing the maximum sustained yield for the current inventory would support the Purpose and Need for providing a sustained yield of timber. It could be argued that it is inconsistent for the timber inventory to go up and the sustained yield to go down, such as is shown in the trend of the revenue Table 3-191 (p 563).

One analysis shows that only 14-32% of the landbase is available for Sustained Yield management (Cadwell, 2015). Consistent with the increased forest inventory (such as Fig 3-70, p 257 and Table 3-57, p 256) and benchmark of maximum sustained yield, the range of alternatives presented by the BLM should include at least one alternatives with gradually increasing revenue and timber harvest volume over time, to a plateau after several decades. This is consistent with the increasing standing inventory at the proposed low rates of harvest in the alternatives, the need for early seral, and the need to manage for fire.

To clarify the history to the reader, and help to understand the purpose of providing a sustained yield of timber, Figures 3-143 and 3-144, which only show 14 years of data for total annual harvest value and average value per MBF should span the same 50-year time spans as Figures 3-141 and Figure 3-142, which show Harvest Volume and Stumpage Price. Otherwise important comparative information to understand the context and history of Gross Timber

Receipts is not being shared with the public. This directly affects understanding the purpose of providing a sustained yield of timber and revenues to Counties.

Table 3-173 page 526. This table is an economic analysis of goods and services. Economic values are monetized. Two different methodologies for monetizing are used in the same table. This table is misleading. All categories should be analyzed with the same methodology, or they should not be analyzed at all. By same methodology is meant the same extent of “apples to apples” comparison of indirect value of goods and services included.

Future growth modeling and projections by the BLM should be longer term, and be based on some kind of long term vision for the BLM lands. This aids in accountability and transparency to the public, and would keep planning from being so cumbersome each time, by building more directly on what had been done previously. Modeling for as long as 350 years is recommended because it reaches beyond the effects of legacy actions and reflects the life span of the forest.

Please make all of the public comments available on the internet as soon after the comment period closes as possible, in a format that is searchable on key words and organization that submitted the comment, because this is a logical part of transparency.

The noxious weed management program should be increased, because noxious weeds, including scotch broom, Himalaya blackberry, gorse, Japanese knotweed, yellow star thistle, tall fescue, velvetgrass, etc. are using up more and more valuable habitat that should be occupied by naturally occurring species. Eradication of noxious weeds in most cases, is prohibitive, due to the cost.

Thank you for the opportunity to provide this input.

Please let me know if there is anything I can do to be of further assistance. My contact information follows.

Sincerely,

---

Rick Sohn  
[rsohn@umpquacoquille.com](mailto:rsohn@umpquacoquille.com)  
(541) 430-6912

### **References Cited**

Cadwell, Chris. 2015. Overview of BLM Draft Alternatives for Management of the O&C BLM Lands Powerpoint Presentation to Douglas Timber Operators June 11, 2015

Johnson, K Norman and Franklin, Jerry F. 2013. Increasing Timber harvest Levels on the BLM O&C Lands While Maintaining Environmental Values. Revised Testimony before the Senate Committee on Energy and Natural Resources June 25, 2013. PDF File.

Nonaka, Etsuko and Spies, Thomas A. 2005. Historical Range of Variability in Landscape Structure: A Simulation Study in Oregon, USA. *Ecological Applications*, 15(5), pp. 1727-1746.

Spies, Thomas A. and Duncan, Sally L., 2009. Old Growth in a New World, A Pacific Northwest Icon Erexamined. Island Press.

Swanson, Mark E. 2012. Early Seral Forest in the Pacific Northwest: A Literature Review and Synthesis of Current Science. Produced for Willamette National Forest, Central Cascades Adaptive Management Partnership.

----- Forwarded message -----

From: **Tina Brannon (Rough & Ready Lumber)** <[hr@rrlumber.com](mailto:hr@rrlumber.com)>

Date: Thu, Aug 20, 2015 at 11:22 AM

Subject: BLM Resource Management Plan

To: [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)

None of the current RMP Alternatives are acceptable!

**The social & economic benefits of the local communities should be in the beginning of the development of any RMP - not an analysis done at the end!**

The O&C lands were designated to provide a secure source of funding for the local schools and provide a sustainable supply of timber for the local communities. These lands are different than those public lands identified as “public domain” or the majority of those managed by the USFS. These lands were not set aside for wilderness designation nor were they directed by the O&C act to only be partially managed. The directive from the act and its related amendments were to provide secure funding for local schools and communities through the “sustainable” harvest of timber from these lands.

The current lack of management and harvest directly impacts the local communities and schools. The lack of a sustainable timber source has led to the loss of thousands of family wage jobs since the implementation of the Northwest Forest Plan. This lack of income directly impacts local communities as can be seen by the number of families on government assistance in these rural communities.

An alternative that identifies and directs the harvest of 70%-80% of the annual growth off of these lands would provide a secure source of funding and promote healthy local economies. This level of harvest would promote healthy and productive forests. This level of harvest is sustainable. This level of harvest should be included in the new RMP.

Tina Brannon

Human Resources Department



Quality Lumber Since 1922

Rough & Ready Lumber LLC

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30365 Redwood Highway

Cave Junction, OR 97523

541 592-3116 541 592-3221 facsimile

**QUALITY LUMBER SINCE 1922**

----- Forwarded message -----

From: **Logs Accounting** <[logs@rrlumber.com](mailto:logs@rrlumber.com)>

Date: Thu, Aug 20, 2015 at 12:34 PM

Subject: RMP comments

To: [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)

To whom it may concern;

My concerns with the RMP are as follows:

**1. Failure to maintain a healthy forest is a major concern.**

None of the current Alternatives are acceptable.

The western Oregon BLM Districts over the last 20 years have failed to manage or even maintain a healthy forest ecosystem, from the moist forest region in the north to the dry forest region of southern Oregon. The lack of management has allowed an accumulation of forest biomass that is not natural or healthy. The surplus biomass is not made up of healthy trees, but rather it's made up of unhealthy or dying dominant and co-dominant trees with a dense understory of brush and shade tolerant species of trees that are robbing potential and existing mature trees of critical nutrients and moisture. The result of this lack of management cannot be fixed with the current RMP and any new RMP must address active management of our forests to maintain a healthy forest environment and sustain a healthy economic environment for our communities.

Current harvest levels are less than 1% of annual estimated growth. Forests are not static, the natural environment has been altered by human civilization during the past century and any RMP must consider the impacts and consequences on both our communities and our forests. At this point in time the idea or consideration of a "no action" alternative is both irresponsible and impractical. Additionally, the consideration of any alternative that does not provide a secure and reliable source of timber to the local economies is equally unacceptable. The O&C Act directed the sustainable harvest of timber off of the O&C lands for the direct benefit of the local communities and schools, none of the current alternatives meet that directive.

Please go back to the table and develop an alternative that provides for a secure, reliable source of timber and brings back a healthy sustainable forest.

**2. Carbon and Climate change**

None of the RMP Alternatives are acceptable.

The agency must use science when developing its RMP and not develop a plan that addresses climate change based on models that have been proven wrong and are outdated. Several things related to the changing climate can and should be addressed. The unnatural levels of biomass consume vast amounts of water that would otherwise be maintaining stream flows during the critical summer months, resulting in lack of water and increased water temperatures from reduced artesian influence. Completely shaded streams will still assume air temperature without the introduction of cooler ground water.

As a result of the increased biomass on our landscape and the increased amount of dead and dying organic material on the ground there is increased decay taking place. This increased decay releases carbon, but it also creates methane which has a much more severe impact as a “greenhouse gas” than carbon dioxide. If we are truly interested in Carbon Sequestration we should be looking at full suppression of all wildfires and focus on commercial harvesting.

The agency must not only consider the amount of carbon released from the increasing number of acres burned by wildfires, but also the continued release of the dead and dying trees after the fires. Commercial removal of wood, both green and salvage locks up large percentages of stored carbon in the form of lumber and panels used in buildings. Wood residues not made into building materials go into products such as paper and other biodegradable products that if not recycled are put into landfills and buried where the released carbon is trapped in the soil.

Please revisit the current RMP Alternatives and develop one that is based on true science. Develop a plan that provides for healthy forests and healthy local economies. We will all benefit from a well-managed and healthy forest.

### **3. Social & Economic Benefits**

None of the current RMP Alternatives are acceptable.

The social & economic benefits of the local communities should be in the beginning of the development of any RMP, not an analysis at the end. The O&C lands were designated to provide a secure source of funding for the local schools and provide a sustainable supply of timber for the local communities. These lands are different than those public lands identified as “public domain” or the majority of those managed by the USFS. These lands were not set aside for wilderness designation nor were they directed by the O&C act to only be partially managed. The directive from the act and its related amendments were to provide secure funding for local schools and communities through the “sustainable” harvest of timber from these lands.

The current lack of management and harvest directly impacts the local communities and schools. The lack of a sustainable timber source has led to the loss of thousands of family wage jobs since the implementation of the Northwest Forest Plan. This lack of income directly impacts local communities as can be seen by the number of families on government assistance in these rural communities.

An alternative that identifies and directs the harvest of 70%-80% of the annual growth off of these lands would provide a secure source of funding and promote healthy local economies. This level of harvest would promote healthy and productive forests. This level of harvest is sustainable. This level of harvest should be included in the new RMP.

Thank you for your time,

**Jackie Chidester**

Log & Timber Accountant

**Perpetua Lumber Company**

**Rough & Ready Lumber LLC**

**Perpetua Forests Company**

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Cave Junction, OR

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Quality Lumber Since 1922





August 20, 2015

RMPs for Western Oregon  
Bureau of Land Management  
P.O. Box 2965  
Portland, Oregon 97208

VIA EMAIL: [blm\\_or\\_rmpwo\\_comments@blm.gov](mailto:blm_or_rmpwo_comments@blm.gov)

RE: BLM Western Oregon Draft Resource Management Plans

To Whom It May Concern:

Thank you for this opportunity to present comments on the draft Resource Management Plans (RMPs) for Western Oregon. The approximately 2.5 million acres covered by these plans play an important role in the social and economic well-being of rural communities throughout Oregon.

Interfor has two mills in Oregon—both of which rely on timber from these lands. The Molalla Division consists of a stud mill that currently produces kiln dried Douglas-fir and Hem-fir studs. Molalla currently has 171 full time employees. Interfor is constantly striving to operate at full capacity and improve its facility to adapt to available log supply. Lack of log supply hinders Molalla's ability to operate at its full capacity. Increasing public supply would greatly improve our ability to achieve our goal of full capacity operation, and further allow Interfor to be an even larger provider of local employment for the area.

Interfor's Gilchrist Division is the major economic driver for the Town of Gilchrist, supporting 450 direct and indirect jobs. We've invested more than \$15 million on upgrades since we bought the mill in 2004. This includes \$5 million in 2014 to turn Gilchrist from a commodity mill to a specialty mill.

We are very disappointed with the inadequate range of alternatives. Perhaps even more troubling is the agency's preferred alternative B that provides a sustained harvest level of just 20 percent of the forest's annual growth while more than doubling the acreage of land set-asides. Less than 30 percent of the land would be open to timber management under the agency's preferred alternative and would result in an unequal distribution of timber and jobs throughout all districts. We believe all the action alternatives are inconsistent with the O&C Act.

Interfor U.S. Inc.

**Gilchrist Division**  
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Interfor.com

The BLM's own website states<sup>1</sup>:

"The O&C Lands Act placed management jurisdiction of the lands under the United States Department of the Interior, and directed that timberlands be managed:

*". . . for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the principal of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities . . .(43 U.S.C. §1181a)"*

There is simply no rational argument that the alternatives presented would comply with the above and particularly the requirement for "contributing to the economic stability of local communities and industries".

Alternatives that lock as much as 86 percent of BLM's forests from active management will lead to further declines in forest health, and will provide our communities no relief from severe and catastrophic wildfire.

For these reasons, the proposed alternatives should be discarded in favor of new alternatives that honor the O&C Act, keep our forests healthy, and create more jobs in our communities.

Thank you again for this opportunity to provide comments.

Sincerely,



Charles H. Burley, CF

Public Affairs Manager  
[chuck.burley@interfor.com](mailto:chuck.burley@interfor.com)  
(541) 876-7880



August 14, 2015

Mr. Jerry Perez  
BLM State Director  
1220 SW 3<sup>rd</sup> Ave.  
Portland, OR 97204

Dear Mr. Perez:

These comments are in response to your recently released EIS for the Resource Management Plan Update for the management of the O&C Lands in Western Oregon.

Douglas Timber Operators is a regional trade association representing the Forest Products and Allied Industries in Douglas, Lane and Coos Counties. We have approximately 140 members and represent the majority of milling, logging and timberland owners in what is the heart of timber production in Western Oregon.

Management of the O&C Lands is of critical importance to our members. The industrial timberland owners have a unique relationship with the O&C Lands for they manage the majority of the privately held lands in the checkerboard ownership. They share a common road system governed by long standing reciprocal right-of-way agreements that were promulgated by the BLM in the early 1950's. In addition, they share thousands of miles of common property lines with the O&C Lands and, as a result, a common interest in keeping forest fires under control.

Our milling and logging members have had a long history of buying and operating timber sales that provide a valuable raw material for the production of high value construction lumber, plywood and other value-added products to support home construction in the United States. Our other members provide basic services and supplies to our timber producers, providing a vital link to our local economies. Finally, all of us in Western Oregon rely on the clean water flowing from the intermixed ownership, habitat for wildlife and fish as well as a road system that provides year around recreational activities for all to enjoy.

We write to express our very profound disappointment in all of the alternatives the RMP has analyzed and considered for adoption. Between 68% and 86% of the land based was removed from consideration for management before the planning process was initiated. This is a plain and simple violation of NEPA, the law that was designed to give the public a wide range of alternatives for management considerations and the consequences and benefits they represent. Such a skewed initial planning step left considerations of any real management options impossible to meet. In fact, the proposed action alternative is no better than the management plan imposed by the Northwest Forest Plan in the mid 1990's which has been an abject failure in providing economic benefits to our rural counties and is in clear violation of the O&C Act.

More specifically our concerns are:

The alternatives analyzed are not tiered to the Critical Habitat established for the Northern Spotted Owl.

No scientific process was used to determine how to designate "Old Growth" stands resulting in cutoff dates varying from 80 to 160 years.

There is no attempt to provide legal certainty to the alternatives, thereby ignoring the main impediment to plan implementation, "analysis paralysis," widely acknowledged as making federal timberlands impossible to manage.

Shifting the meager harvest levels to the northern Districts away from Medford and Roseburg will have severe impacts on the remaining milling infrastructure in southwest Oregon, exacerbating the current economic conditions our struggling rural communities are trying to cope with.

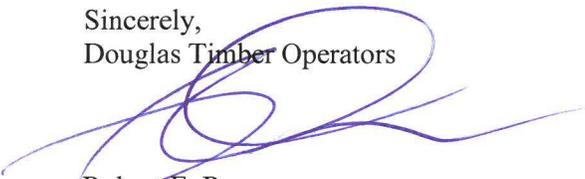
The preferred alternative is a clear violation of the principle of Sustained Yield governing the management of all federal forests for decades, a principle the public demands for governing the management of their forests.

The excessive designations of reserve areas to save the Northern Spotted Owl, which will do nothing to prevent their extirpation by the Barred Owl.

Continued emphasis on growing additional older stands of timber reserves will have severe forest fire consequences. Specific examples include the Douglas Complex and Timbered Rock Fire where regeneration of the burned landscape will take decades to occur. The dead trees left standing after these catastrophic events will not only endanger the new forests managed by adjacent private landowners, but also neighboring rural communities.

We cannot overstate how profoundly disappointed we are with this planning effort and what little it will do to improve the economic health of rural Oregon and the ecological health of our federal forests. A total makeover is clearly what is needed for this plan to be anything other than a total failure for all who live in western rural Oregon.

Sincerely,  
Douglas Timber Operators



Robert E. Ragon  
Executive Director

Cc: Douglas County Commissioners  
Coos County Commissioners  
Roseburg Area Chamber of Commerce  
Bay Area Chamber of Commerce