

From: [Sierra Club](#) on behalf of [Sam Holden](#)
To: [BLM_OR_RMPs_WesternOregon](#)
Subject: Comments on draft Western Oregon BLM Resource Management Plans
Date: Thursday, June 21, 2012 10:17:43 PM

Jun 22, 2012

Oregon BLM
PO Box 2965
Portland, OR 97208

Dear BLM,

I am writing to offer comments on the Resource Management Plans for Western Oregon BLM. I support greater protection for mature and old growth forests across all 2.6 million acres of BLM forests in Western Oregon, and the maintenance of existing Northwest Forest Plan protections.

BLM lands provide tremendous value to communities across western Oregon, including clean water, salmon habitat, and mature and old-growth forests. They contribute to the quality of life that brings new businesses to Oregon, and provide millions of dollars to local communities from travel and recreation.

Please protect streamside and mature and old growth forests on these public lands and ensure that the many special places on BLM remain intact for future generations. Clearcutting should not be allowed and mining activities that threaten clean water and Oregon's iconic salmon should be removed.

I also support enhancement of non-motorized recreation opportunities on western Oregon BLM lands. BLM land should not be a playground for Off Highway Vehicles (OHV). Rare plants, clean water and other recreational uses can be harmed by incompatible OHV use. Please ensure that OHV damage is limited, and that cross-county travel on OHV's on BLM lands is prohibited.

Please ensure that the Western Oregon BLM RMP's do the following:

- 1) Shift BLM priorities away from regeneration harvest (clearcutting) of mature and old growth forests and toward forest and watershed restoration, with a focus on previously managed stands and the existing road network.
- 2) Create jobs through diverse restoration activities - enhancing salmon streams, thinning young plantations, removing crumbling roads and improving fish passage, removing brush and flammable underbrush from areas near communities.
- 3) Protect from logging all remaining mature and old growth forests on these lands, regardless of current land management allocation.

THE WILDLIFE AND WATERSHED CONSERVATION ACT

A.) WILDERNESS PARTITIONS: All timber lands must be partitioned into continuous areas no larger than 10 square km, and 33% of each partition

is declared a wilderness area, never to be harvested again.

B.) WILDERNESS DISTRIBUTION: Any harvested section of timber land may not be more than 1 km from a Wilderness area.

C.) FIRST LIMIT: Harvesting is not allowed within 50 meters of any waterway

D.) SECOND LIMIT: No more than 33% of the area in any one partition may be harvested at a time, with half the commercial growth period separating each harvest.

E.) THIRD LIMIT: Timber lands must be harvested in a way that maintains alternating strips of forested and felled area, with each strip not exceeding 150 meters in width.

Satellite imagery and the availability of the likes of Google Earth makes what was formerly impossible, possible. Under this act, timber companies would be responsible for regulating themselves, and any individual using Google Earth and its tools could spot a violation and report it, this violation being verified by Forest Service officials with the power to fine irresponsible harvesters.

Violations and penalties would be a much more complex subject, and there are numerous conditions to be included in the law, e.g timber harvesting on privately owned lands smaller than 10 square km are not subject to these rules, commercial thinning is not harvesting, etc. The final penalty for an organization who repeatedly violates its timber reserves under these rules should be a public auction of the violated partition(s.)

Thank you for the opportunity to comment on these plans.

Sincerely,

Mr. Sam Holden
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