

From: [Gordon Lyford](#)
To: [BLM_OR_RMPs_WesternOregon](#)
Subject: Scoping Comments for Western Oregon RMPs
Date: Wednesday, July 04, 2012 10:28:40 AM

Dear BLM-

Scoping Comments for Western Oregon RMPs.

The O&C Act requires:

- Permanent forest production in conformity with the principal of sustained yield
- Permanent source of timber supply
- Protecting watersheds
- Regulating stream flow
- Economic stability of local communities and industries
- Providing recreational facilities

The BLM has never complied with these O&C Act requirements and has routinely and consistently violated the letter and intent of the law as well as other laws such as the Clear Water Act, Clean Air Act, and Endangered Species Act.

My hope is that the BLM, under a new RMP, will decide to obey these laws for the first time. Under a new RPM the BLM should put the public interests ahead of the special industrial corporate interests. The reverse has been the case during BLM's entire history to date.

Therefore:

1) To provide for permanent forest production in conformity with the principal of sustained yield, clear cuts and regeneration harvests should be banned. A tree farm is not a permanent forest. Sustained yield means that it can be done forever without changing the character of the natural forest. All native species and age classes must remain after a thinning harvest. Hazardous fuels reduction thinning should be the primary goal until the forests recover from past BLM abuse.

2) A permanent source of timber supply must be based on a true sustained yield of all native species. The EIS should disclose the annual average sustained yields expressed in mbf per acre for each timber species. The theoretical sustained yields should be reduced to account for potential losses due to disease, insects, fires, droughts, and to provide for a safety factor.

Tables should be developed showing by 50 year age class groups of each tree species the average number of stems per acre for natural conditions, present conditions, and desired future conditions for each unit and treatment. Tables should also be presented showing how many

mbf each timber species stem contains by 50 year age class groups. Further tables should show how many stems per acre will be logged and how many will remain for each timber species by 50 year age class groups for each treatment. This will allow the public to better understand the magnitude of each proposed treatment, and would reveal whether or not the BLM plans are truly sustainable or not. Most people want to know how many large trees will be cut and how many will remain following logging. Not until these tables have been prepared and presented in the RMPs will it be possible to judge the efficacy of the BLM action alternatives. The RMPs should clearly describe the desired future conditions of the BLM lands using such tables, and drawings or diagrams.

3) Protecting watersheds means preventing soil erosion. Soil erosion is prevented by maintaining soil cover and preventing soil compaction so that runoff is minimized. Regulating stream flow means slowing surface runoff and maximizing water infiltration into the soil so that flooding is reduced and summer time stream flow is maximized through subsurface flow into the streams.

4) Economic stability is provided through special forest products and not just by logging. The rule should be "take a little and leave a lot".

5) Recreational facilities should include camping, biking, hiking, wildlife viewing, wildflower viewing, and hunting. OHV uses should be discouraged and minimized or banned. OHV uses are incompatible with the principals of sustained yield. No cross country OHV use should be allowed and only designated roads should allow OHV uses. No OHV uses should be allowed where residences can hear them, probably more than two miles away from private property. All sensitive areas should be closed to OHVs.

Sincerely-

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