

From: [Deborah Noble](#)
To: [BLM_OR_RMPs_WesternOregon](#)
Subject: Scoping Comments
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Scoping Comments

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Offer thinning sales in small units which would be accessible to/and affordable by local small timber operations without access to expensive equipment.

My husband , Peter Noble, and I are in the lumber trading business. We own West Wind Forest Products (Eugene, OR)which is a distribution center for Glulam Douglas fir which is bought from mills throughout the Northwest and sold to laminators who make beams. Harvesting in small units by local timber operators will add value to the forest products when used for laminated beam production as our products are more expensive than dimension lumber. Very young trees can be used for milling fir for lamination.

I urge the BLM to consider the following points:

Continue to adhere to the Northwest Forest Plan guidelines to ensure the health of our watersheds and to provide clean water for our communities. Ban regeneration harvests (clear-cuts) and steep slope logging.

Increase environmental protections for old-growth and mature second-growth forest habitat. Plan for true long-term sustainability of the native forest, watersheds, and related ecosystems and species

- Completely preserve critical habitat for threatened and endangered (T&E) species
- No logging of old trees anywhere, defined as trees more than 75 years old
- No logging in previously unlogged native forest
- Create strict and substantive protection of riparian corridors, pocket wetlands, and remaining native uplands

Plan for true long-term sustainability of the native forest, watersheds, and related ecosystems and species

Ban the use of pesticide and herbicide spraying in our watersheds.

Maintain federal control and regulation of the O&C lands currently managed by the BLM. Do NOT relinquish management of BLM lands to non-federal agencies or private concerns as suggested in Congressman Defazio's O&C Trust, Conservation & Jobs Act (O&CTCJ Act).

Work on legislation to overturn the 1937 O&C Act which mandates our forests are to be managed as timber plantations.

The BLM should actively seek and promote other sources of revenue for our counties to replace timber

sales such as:

- BLM should support legislation for an increased severance tax (“harvest tax”) for large industrial timber owners, and increased property taxes for large timber owners, who currently pay minimal property tax and receive large rebates in the form of credits, refunds and incentives.
- **Seek increased revenue from recreational use not by simply raising fees, but by actively promoting BLM forests as educational resources and for eco-tourism, leading hikes, camping, etc.**
- Allow the public access to areas soon-to-be-harvested or which have been recently harvested for foraging and firewood gathering;
- Actively managing to create habitat for non-forest timber products such as mushrooms, edible plants, medicinal plants, decorative greens;
- Enroll in a carbon credit system to compensate Oregon for the carbon sequestration provided by our public forests.

The BLM should tighten local milling requirements for timber harvested from its public lands to increase domestic jobs, which are lost when logs are minimally milled and exported.

Study and employ other methods of timber harvesting that focus on the sustained health of the forest instead of the sustained amount of board feet harvested.

Regarding Process:

Use a formal collaborative community process, not just focus groups, not just an agency internal project

-- Use a deep consensus-building process involving a full spectrum of political, economic, environmental, social, and geographic interests

-- Listen deeply and respectfully to plan critics and potential critics around the spectrum of interests and concerns

-- Support constructive interaction and conflict resolution among plan critics and potential critics, rather than trying to carry all conflict resolution on the agency's own shoulders

Thank You,
Deborah Noble