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**To:** [BLM\\_OR\\_RMPs\\_WesternOregon](#)  
**Subject:** Scoping Comments for Western Oregon RMPs  
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Comments submitted by Alison Center, [scottnalison@epud.net](mailto:scottnalison@epud.net), 78588 Cedar Park Road, Cottage Grove, OR 97424

Scoping comments for the new Western Oregon RMPs:

Follow the spotted owl and marbled murrelet recovery plans. Recognize critical habitat as a land use allocation. Preserve all mature and old growth forests. Protect active spotted owl and murrelet sites. Thin younger stands with a goal of producing forest stands with old growth characteristics. On districts (Eugene) where very young stands were precommercially thinned with wide spacing and tree releases to promote several open grown trees per acre, re-treat with thinning to encourage these trees to grow large branches and diameters.

When seeking to produce high quality early seral forest habitat, do not sacrifice mature stands over 80 years old or old growth stands. Use younger stands under 80 years old. Manage the "connectivity zones" (South Lane County/North Douglas County and around Glendale south of Roseburg and the Siskiyou) to promote dispersal of forest species, especially spotted owls, between the Cascade forests and Coast Range forests. Manage the land is such a way that there is always dispersal habitat available (generally considered to be stands between 40 – 79 years old), not only for juvenile owls to move through in a day or two, but also to support first year owls over the winter with shelter and prey.

Keep the riparian reserves from the present RMPs as a land use allocation. This will ensure clean water, it will protect "survey and manage" species, provide dispersal habitat for a variety of species including spotted owls, and promote salmon runs.

The Johnson's hairstreak butterfly is becoming rare. Its habitat is mistletoe in hemlock stands. Keep some of these stands throughout the landscape to maintain populations of Johnson's hairstreak butterflies. Do not harvest hemlock stands with an objective of destroying all of the mistletoe. Use what was learned on "survey and manage species" listed in the NW Forest Plan in order to maintain these species. In some cases, a species might have been found to flourish in a multitude of conditions and nothing more needs to be done. Other species might need a riparian reserve of a certain size or areas of closed canopy. In some cases, surveys might be necessary but in many cases, maintaining certain forest features across the landscape will be enough to ensure that these species continue to thrive in BLM forests.

When doing economic analysis, analyze timber and special forest products in the same way. If the timber analysis includes the sale of the trees, the sale of the processed lumber, and the sale of finished construction projects and all of the jobs supported by timber along the way, the analysis of special forest products should be the same. Don't stop with the cost of the special forest products permit. For example, a person buys a permit to cut salal which is sold to a florist who uses it in a flower arrangement and sells it again. Or, someone permitted to pick mushrooms sells them to a mushroom buyer who then sells them (sometimes at a considerable markup) to restaurants, grocery stores and markets (including some overseas) which also sell them again. Special forest products are valuable and do create a variety of jobs.

Thank you for the opportunity to comment and for the visit by the Eugene District team to Cottage Grove. Alison Center