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To: [BLM OR RMPs WesternOregon](#)
Subject: Public Scoping Comment
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Public Scoping Comment to Oregon BLM's proposed resource management plan (RMP) revision.

BLM's attempt to limit scoping issues and dialogue to the presented menu of questions suggests that the agency will not be considering comments that don't fall within these particular sideboards. Please use the NEPA process properly when evaluating the public's scoping comments for this proposed action and adjust your sideboards accordingly. I will attempt to relate my comments to the limited format presented, but what BLM is presenting as the most important issues to be addressed by this RMP revision aren't necessarily the only important issues from a biological or socioeconomic point of view as specified in the NEPA process.

What new or innovative ideas should BLM consider in this planning process?

As a former Oregon BLM employee, experienced forest management practitioner and adjacent landowner, I can state with assurance that the most innovative new idea BLM should consider is this: try actually following the current Land Use Plan and associated RMPs instead of figuring how to avoid compliance with the biologically sound practices of Ecosystem Management. Any "failure" of the NW Forest Plan within BLM's jurisdiction can largely be attributed to the fact that the majority of Resource Areas in Western Oregon Districts never really implemented the NW Forest Plan. The production losses created by extensive litigation are BLM's fault. The agency would not have been in court had they simply followed the law instead of dragging foot or pushing the envelop of revisionist practices in constant attempts to get around the Land Use Plan in favor of industrial practices that degrade important natural resources. This degradation was not just the nation's resources being managed in trust by BLM: the ownership characteristics of O&C lands causes BLM actions to directly affect neighboring landowners every other square mile. BLM needs to acknowledge that agency actions affect these intermingled ownerships, greatly expanding the scope and scale of the effects BLM actions generate.

How can BLM lands contribute to local economies and support local communities?

By considering other industries besides the timber industry in economic analysis. There many other values BLM lands contain, and several have greater short and long-term economic value than timber extraction.

How can BLM provide habitat for fish and wildlife and contribute to the recovery Endangered Species Act listed species?

How should BLM manage forests to protect property and ensure our forests are fire resilient?

How should BLM-administered lands be managed to contribute to clean water and safe drinking water?

Use of "science" is meaningless unless the data used to evaluate a proposed action is relevant and correct. BLM routinely uses inaccurate or inadequate data to make the analysis fit the desired project goal. Modeling forest cover from decades-old aerial photos instead of using current GIS-based imagery as Medford District does is a perfect example of specious use of "science" that should not be allowed to continue. This agency can't achieve any of the above goals unless it starts evaluating effects from real and current data.

How should BLM-administered lands be managed to contribute to clean water and safe drinking water?

Geologic characteristics of much of Oregon's BLM-managed landscape are largely ignored by BLM analysis, at the risk of public health and safety. Water quality and soil conservation through proper evaluation and informed planning go hand in hand. BLM has and still does threaten public safety with on-going forest management practices that fail to evaluate on their own management directives. Washington needs to treat all citizens the same for a change.

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