

October 19, 2007

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Mr. Edward Shepard  
State Director  
PO Box 2965  
Portland, OR 97208

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RE: Western Oregon Plan Revisions

Dear BLM:

My first comment addresses the introduction by Mr. Shepard in Vol. 1 regarding his request for substantive and useful comments to the DEIS. Looking for errors in analysis; missing information; perhaps even suggesting a definition of a new sum-of-the-parts alternative that meets the BLM interpretation of statutory sufficiency; or how to develop structurally complex forests; and techniques to increase fire resiliency in Southern Oregon... all within a 1600 page document that took the BLM how many years and people to prepare seems to me a ridiculous expectation. Therefore I will not attempt to analyze what "Collapsing the Stratification into Modeling Groups" means within the scope of the DEIS but I will comment that LMSA's that do not produce sustainable harvest levels over time because stands mature and become ineligible for thinning past 80 years of age (Q-1565) is a crock and not compatible with the O&C mandate.

The BLM has identified the O&C Act as the mandated legal authority for managing BLM-administered lands in Western Oregon. However, it appears from all the alternatives presented in the DEIS that the sustained yield of timber principle is not being given the emphasis intended by the Act. In looking at the preferred alternative, which provides the most socioeconomic benefits to communities, the amount of land in the most productive timber growing districts, Roseburg and Coos Bay, is less than 50% of the total land base. I believe that adjustments need to be made to the LSMA's in Alternative 2 to increase harvests while maintaining suitable stand structures for protected species, possibly by using management techniques in Alternative 3 that allow for not only catastrophic salvage but also annual salvage, more intensive thinning regimes unrestricted by age, and selective regeneration cuts. In other words, use intensive management options to achieve more diverse stand structures in a shorter time across at least 70% of the landscape.

Alternative 2 is more progressive in looking at landscape issues than the current Plan but it does not go far enough in eliminating the hyper-focused reserve mentality of species and habitat management. Active management through timber harvest achieves a broader spectrum of environmental and socioeconomic benefits than passive management with its inherent catastrophic risks. The land use allocation for the Timber Management Area in Alternative 2 should therefore be increased by incorporating more of the LMSA allocation. This provides much greater flexibility for long-term management and sustainability of forest resources even if certain species or habitats may fluctuate from

some mythical optimum over time across the landscape. An equal balance of all resources at all times is neither possible nor preferable. Since the guiding principle of BLM administered lands emphasizes sustainable timber production then it should be the dominant decision making factor within legal constraints.

Another issue that concerns me is that historically the BLM has cooperated with private landowners for access across BLM lands. In recent years onerous procedures have unreasonably delayed use of private lands and increased the catastrophic risks to those lands due to lack of access or deferred maintenance. Enough protections are already in place, including state regulations, that to require lengthy and expensive environmental analyses subject to frivolous appeals should be addressed in the DEIS and final Plan so that access is protected and the process is streamlined.

BLM managed lands have enhanced my quality of life because of the employment opportunities timber harvesting provides and because I have access to recreation experiences made possible by BLM road systems. There is abundant wildlife and it is my observation and experience that scenic, water, and fish resources are healthy. Collaborative efforts in restoration and enhancement of stream and fish habitat are important but hopefully the long-term landscape will be enhanced by the new improved Plan. That plan should be an enhanced version of Alternative 2 that brings the LMSA's into more intensive management and production.

Sincerely,

A handwritten signature in cursive script that reads "Michael Boyd".

Michael Boyd  
Roseburg, OR