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31750 Peoria Road  
Albany, OR 97321  
January 8, 2008

Western Oregon Plan Revisions  
P.O. Box 2965  
Portland, OR 97208

Gentlemen and Ladies:

Thank you for giving me the opportunity to review your Draft Environmental Impact Statement for the western Oregon BLM Districts. It is a comprehensive, thorough, balanced document, and the project staff listed on pages 830-844 should be commended for their fine work in preparing it.

I do not have solid data to refute or even challenge the quantitative information and statistics included in your detailed tables, clear figures, and beautiful maps. After spending 40 years as a professional forester, however, I do have enough technical training and field experience to question your preferred Action Alternative. My comments and questions are listed below.

If the BLM has not been achieving the timber harvest levels directed by existing plans, why must new plans be implemented to increase harvest levels? Not meeting harvest levels set by the existing plan isn't the result of a faulty plan -- it's the result of not following that plan. Harvesting the volumes proposed under existing plans would ameliorate the present underharvesting problem without going to the extremes proposed in Alternative #2.

Eighty- to 100 year rotations for timber management areas are logical and praiseworthy. Rotations of 40 years in the western hemlock and tanoak vegetation series and 60 years in the Douglas-fir and true fir series are not long enough to fully utilize the sites involved, however, and they should not be employed. At age 60 most Douglas-fir stands are in their maximum growth period. Furthermore, many hot and dry or frost-prone sites in the Roseburg and Medford Districts do not regenerate satisfactorily for 10 or 20 years after harvest. Examples include dry southwestern aspects in the Roseburg District and the Dead Indian Plateau in the Medford District.

Halving the width of current riparian reserves seems like a poor way to increase harvest volumes. Similarly, eliminating green-tree retention after regeneration harvesting probably would be a mistake -- an unnecessary bias toward timber production over wildlife habitat and the development of structurally complex stands.

The No Action Alternative probably would not increase the allowable sale quantity sufficiently to ameliorate the economic and social problems now being experienced in timber-dependent counties, and retaining 73% of the forested acres in a nonharvest classification does not seem like wise use. Alternative 2 seems excessive, however, and its economic benefits probably would not be worth the severe ecological impacts involved. Indeed, Alternative 2 appears to be aimed at "getting out the cut" with insufficient attention to wildlife, recreation, and water quality. This is illustrated by the proposed policy for marbled murrelet management, where surveys for the murrelet would not even be attempted under Alternative 2.

Alternative 1, Subalternative 1 appears to be the best option listed in your Draft Environmental Impact Statement. It would accomplish the thinning needed in many western-Oregon stands and increase allowable sale quantities while not seriously affecting spotted owl habitat. It also would better meet the habitat needs of aquatic-and riparian-associated species, have less risk of invasive plant introduction and spread, increase the abundance of structurally complex forests, and maintain existing visual resource quality more than Alternatives 2 and 3.

Please note that the subalternatives listed in Table 39 on page 111 do not agree with the subalternatives described on pages 560-563. I assume that pages 560-563 are correct, and that subalternative 1 specifies no regeneration harvesting until thinning opportunities are exhausted.

Whatever alternative is selected, I hope that regeneration harvesting will be done in site-specific ways that are designed to assure adequate regeneration and not just maximum efficiency in harvesting.

Sincerely,

A handwritten signature in cursive script that reads "Don Minore".

Don Minore,  
Retired Research Forester