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BLM, Oregon/Washington State Office
Attention: Western Oregon Planning Revision (OR930.1)
P.O. Box 2965
Portland, Oregon 97208

Ed Shepard, Oregon/Washington State Director
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Re: Draft WOPR EIS Comments

I have comments on the Draft WOPR EIS in three general categories: the physical attributes of SW Oregon that make land management challenging, the proposed OHV use in SW Oregon, and the lack of this Draft EIS to reference any need for public or community collaboration (save regarding the OHV issue).

The Klamath-Siskiyou Province

The Preferred Alternative of the Draft EIS ignores the ecological differences between the northern and coastal stands and those in the Klamath-Siskiyou Province. For 15 years, the Applegate Partnership and other concerned residents of the Applegate have worked with the BLM and the Forest Service to appropriately care for our diverse forests, while still meeting the annual timber volumes. Implementation of Alternative 2 would deviate significantly from the practices that have been successful here in SW Oregon regarding commercial timber extraction. Such deviation would be detrimental to forest health, water quality, species habitat and wildfire risk in our area.

The WOPR Team is aware of the Klamath-Siskiyou Province and its unique and challenging physical attributes; Volume 1, page 183 makes this acknowledgement. Our Mediterranean climate provides multiple-species stands in our forests, multiple-aged stands, high wildfire hazard, and a significant variety of species that are threatened, endangered, or in some way under watch. Biodiversity abounds in so many ways, that those who only know the monogamous coastal stands can not comprehend the significance. And, many of our Applegate rivers and streams are habitat for the endangered coho salmon, providing one third of all coho spawning habitat in the Rogue Basin.

Unfortunately, many of these waterways are listed on the State's 303d list for limited water quality, due to high stream temperatures. This, global warming, and the high number of acres (52,506) and miles (387.9) of rivers within the Medford District that are "eligible" to be designated as wild and/or scenic rivers, should all be driving factors in riparian management for our region. Some items that should not be included in the Medford District Decision would be yarding corridors in riparian zones (Vol. 1, page 52), prescribed burns (thinning and burning of piles should be used instead) in riparian zones (Vol. 1, page 57), and additional new roads or

trails (as suggested in Vol. 1, page 49, 7th bullet). These “site-specific circumstances” do make the application of those Management Actions impractical, and inconsistent with Management Objectives for water (Vol. 1, page 57).

Even more significant in land management here is the diversity of our geology. To quote retired US Forest Service Ecologist Thomas Atzet, Ph.D., “Agency personnel and southwest Oregon locals have known for some time that southwest Oregon with its Mediterranean climate and unusually diverse and aged geology does not well respond to harvest strategies developed and used in adjacent ecosystems in the temperate ecosystems to the north. Together we have traditionally coupled professional expertise and local experience to collaborate and adapt state of the art science and modeling for the benefit of the ecosystems and local communities.”¹ In the Applegate we have not had a clearcut timber sale since 1992, and yet we can and have met timber volumes (even when other Resource Areas in the District did not). Any Decision for the Medford District needs to recognize the differences in our climate, soils, waterways, species diversity and forest stands, and it needs to incorporate them in regard to all aspects of land management.

All of this ‘variety’ contributes to our region having the highest wildfire hazard and risk ratings in the state of Oregon (according to local ODF personnel). Any change in federal land management in the Medford District must first and foremost address the wildfire hazard. Our forests need to become more fire resilient, and your Management Objectives, Vol. 1, page 33 are right-on. Those of us in the Medford District who have been rigorously treating our hazardous fuels (on both public and private lands) know that these efforts to date are still just “a drop in the bucket.” We have been doing many of the other Management Actions listed under wildfire, and feel that fuels thinning should occur in all age stands in conjunction with timber projects. Timber extraction procedures must, however, leave less woody debris on the ground than in past practices, must remove more snags than are presently being taken, and must leave the remaining stands multi-species, and therefore more fire resilient.

While I agree whole-heartedly with the 2nd Management Action for wildfire (on page 33) to prioritize fuels funding, I wonder how this would be implemented, given the current trends to give fuel reduction funding to communities that have just completed a CWPP and that have not received fuels dollars in the past. Federal funding for hazardous fuels reduction needs to be based on need, not cost per acre. It also needs to be separated from timber sales, and while I recognize that this is not something that the WOPR team has any control over, I feel that some sort of recommendations could be made by the State Office to Washington DC to call for a review of how fuels dollars are appropriated and utilized. What we have presently is quite inadequate.

The O & C Act was penned in 1937; we have had 70 years of fire suppression since that time, and the effects of this style of management are well known nation-wide. High fire hazard needs to be the top priority/management objective for the Medford District, so that careful land management can protect our public forests from catastrophic wildfire. So that in turn, there are trees to commercially harvest! This statement is not an attempt to override or trump the O & C Act’s mandate; this is reality, as referenced in Vol. 1, top of page 196. This cannot be ignored

¹ Atzet, Thomas, Ph.D.; from testimony in a Congressional Hearing by the Forests and Forest Health Subcommittee and the Committee on Resources, Feb. 14, 2006; Medford, OR.

in the WOPR Decision for the Medford District; to do so would be nothing short of irresponsible and criminal on the part of the BLM.

Proposed OHV Recreation Sites

Given the types of soil diversity and irregularity, the Management Objective to “Improve or maintain soil productivity” (Vol. 1, page 51), and the high wildfire risks in SW Oregon, it is completely unfathomable as to why 98% of the Preferred Alternative’s new OHV Emphasis Area acreage in western Oregon is targeted for the Medford District. Isn’t soil productivity (and also healthy, productive stands) dependent upon soil stability? The Preferred Alternative would add over 75,000 acres for a total of 100,751 acres (Vol. 1, page 143), which would represent 73.5% of the total designated acreage for OHV Emphasis Areas in the WOPR area.

Where did this idea come from? The only argument that the BLM has provided to residents in the Medford District is that there is currently OHV usage in these proposed areas, therefore they must be appropriate sites. Huh? If this type of reasoning is accepted, I would ask you this - since so many teenagers are smoking and drinking today while still under-age, should we therefore lower the legal age for both to 16, or even 15 years? The answer is obviously ‘no.’

The Medford District recently had to close a trail in one of the currently-open OHV areas due to extreme erosion; an area that’s not even been approved in a management plan. We here in SW Oregon have learned from experience. The designation of an additional 9 areas for OHV use must be considered as “specific on-the-ground activity” (as referenced in Vol. 1, page 23). Our waterways are currently suffering, our wildfire risk is increasing, and local BLM employees are becoming enemies of those private residents whose own property has been “taken” due to the natural expansion of OHV use through their property (and no, my property does not abut any of these areas). This OHV-caused divisiveness is destroying the good will, partnerships, joint fuels projects and initial seeds of trust that have developed over CWPPs and fuels reduction collaboration between SW Oregon’s communities and federal land management agencies. We know this down here; we live it daily, and it saddens those of us who are working with the BLM presently. Conflict would only intensify (not decrease as suggested on page LVIII of Vol. 1), if the number of OHV acres were to increase four-fold.

These are more than enough reason to not approve the designation of any land for OHV use in the Medford District, but I would add one more: funding to effectively patrol the increase in OHV acreage. There is inadequate staffing for such right now in the Medford District; to add even more areas would take funding away from every other facet of land management. Possibly more federal dollars for wildfire suppression, but for OHV patrol? Very unlikely. By establishing these OHV areas without the ability to effectively patrol and manage them, the BLM would be opening themselves up for a significant degree of safety liability.

The common Management Objective for recreation is to “Provide a diversity of developed and dispersed outdoor recreational opportunities...” (Vol. 1, page 49). After reviewing the Draft EIS’s Preferred Alternative, I would say that someone forgot the word ‘diverse’. Spread the OHV areas around to other Districts and regions. Medford has more than they can control. “Providing recreational facilities” is listed last as a reason for BLM to manage O & C lands. It shouldn’t be as high a priority in the WOPR Decision as wildfire safety, forest health and

timber extraction are. Does the BLM deem OHV use as more important than water quality, wildfire risk and the good will of its neighboring private land owners? I sincerely hope not.

Collaboration – Where Is It?

As someone who has been voluntarily working for seven years with federal, state and local wildfire agencies across the country² on CWPP & WUI issues, wildfire preparedness, forest health and stewardship topics, I am absolutely dismayed and outraged at the lack of mention of collaborating with the public in the Draft EIS. Assuming the 'search engine' is functioning correctly on the CD of the Draft EIS, the only two places the word collaboration came up in all 3 volumes was either in regard to cooperating agencies during the WOPR development, or in the discussion on OHV use. As well, the term 'public outreach' was only found in Volume 3 regarding OHV use.

So, I 'searched' for other phrases and federal laws or mandates that I know promote and/or require collaboration by federal land managers.

- *National Fire Plan*: showed up once in Volume 1, page 5 as an example of a new policy. No other reference.
- *Healthy Forests Initiative* or HFI: found once in Volume 2, page 913 as an entry in the list of References used. No details.
- *Healthy Forests Restoration Act* or HFRA: no references anywhere.
- Community Wildfire Protection Plans or CWPPs: found once, Vol. 1, page 25.
- "*A Cohesive Fuels Treatment Strategy*": found once in Volume 2, page 913, as an entry in the list of References used. No details.
- "*Cooperative Conservation*" (per Executive Order 13352, dated 08/26/04): no reference anywhere.

The lack of inclusion of these documents in a draft BLM resource management plan is incomprehensible, given the recognition on page 24, Vol. 1 that the opportunities in Table 14 are "common, dependent or interdependent with the BLM's resource management plans." And what about the recent creation of the document entitled "BLM Partnerships for a Purpose" by the Oregon State Office? Why isn't this document and its concepts mentioned anywhere in the WOPR in regard to implementation of the O & C settlement? In "Chapter 1 – Purpose and Need" page 17, it is recognized that "activities on adjacent private lands have implications for the management of the federal lands." It would seem to me that there is a good degree of inconsistency within the Draft EIS.

I admit, over the past two years the WOPR team has done a good job of providing the interested public with timely information on the process of developing the WOPR. There were many chances for "input" into both the process and the details or concerns of land management that we felt were important to our locale. However, the Preferred Alternative and in fact the

² FYI, I am the Coordinator for the Applegate Fire Plan, I am on the BLM Medford District's RAC, I am on the Western Governor's Association's Forest Health Advisory Committee, I'm the Chair of the Applegate Valley Fire District's Budget Committee, I'm active on the Jackson County Integrated Wildfire Protection Plan's Outreach & Education Committee and served on it's Executive and Fuels committees, I have worked on the development of two other local CWPPs, and have served on the board of the Applegate Partnership and the Jackson County Small Woodlands Association within the past 5 years.

whole Draft EIS does nothing to acknowledge working with local communities and residents (who many times abut BLM lands) to develop land management projects that are appropriate for their area's forests and ecosystems, will complement their CWPPs, will reduce their wildfire hazards and will also provide a locally sustainable timber supply. Could it be that BLM will not be collaborating with local communities and residents on forest management issues. I wonder whether this is a term of "the settlement" that is being kept under-cover?

The State Office of the Oregon/Washington BLM asserts in their recent "*BLM Partnerships for a Purpose*" that "Partnerships have proven to be an effective means of leveraging resources among cooperating organizations, improving working relationships, fostering trust, and recruiting a future workforce." For two years the Applegate Partnership has been asking the BLM WOPR team to commit to continued relationships in the management of federal lands in our watershed by acknowledging our past and our potential, to no avail. There is no mention in the Draft EIS of the Applegate Watershed's success as an Adaptive Management Area (including producing sub-basin watershed analyses for the entire 500,000 acre watershed, numerous stream enhancement projects, setting up riparian monitoring protocol that is now being used by local, state and federal agencies, establishing several hundred plot points across the watershed, and providing a public education instrument in the way of the *Applegator* newspaper for over a dozen years), nor of our role as leaders in the CWPP/community wildfire arena (first community-driven CWPP, a model other communities around the nation have used, public education campaign, over \$1.3 million in fuels grant dollars brought into the area, over 31,000 acres treated for hazardous fuels reduction, over 90% defensible space compliance, and lessons learned shared with other communities).

While I'm gratified to see recognition of the Klamath-Siskiyou Providence in Alternative 3 (this indicates that the WOPR team did get part of the Partnership's message!), I don't feel that the WOPR team "gets" the collaboration part of the AP's request. We've asked to have the AMA designation kept in place, to be used as a monitoring site, a 'forest laboratory' or whatever term fits the BLM's needs. The Draft EIS discusses the need for monitoring and evaluation throughout; we are a ready-built laboratory with significant community capacity and drive. The BLM should include acknowledgement of the Applegate's potential for this in the Decision Record for the Medford District so that we can all embark on a long-term course together. This is within the scope of the EIS, and should be done to honor the Applegate's past and to commit to the future.

Thank you for the opportunity to comment on the WOPR Draft EIS.



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