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To: Bureau of Land Management  
Western Oregon Plan Revision Office  
333 SW 1<sup>st</sup> Avenue  
Portland, OR 97208

January 10, 2008

Re: Western Oregon Plan Revision DEIS

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I have lived in southwest Oregon for 32 years and have worked in the woods for the past 26 years. After reviewing the Western Oregon Plan Revision (WOPR) DEIS, I was disappointed to read that this plan revision reflects going back to the old mindset of managing timber with regeneration management without green tree retention (clearcuts) on O&C lands. That may be an appropriate way of management in areas where trees grow well but in southwest Oregon where we have a harsh climate and soils it is not a wise way to manage.

I understand that this plan revision was done in response to a court order and that at least one of the alternatives would provide for forest production across O&C lands without reserves and I believe that this DEIS does do that. I do not believe that the other alternatives considered have enough range when considering sustained yield, water quality and quantity, fire hazard reduction, rare plants and wildlife, invasive species, and OHV management.

**Sustained yield** – The DEIS glossary mentions that sustained yield includes producing a continuous output of renewable resources “without impairment of the productivity of the land”. Productivity of the land includes the soil and maintaining the nutrients/mycorrhiza etc. needed for trees to grow. If you are clearcutting and have so many young stands (rotation age of 80-100 years) how do you plan to maintain the productivity of the land?

**Water Quality and Quantity** – Water quality is very important to the community and the ability to prevent floods and landslides. Reducing the amount of large trees along riparian areas will contribute to more sedimentation and the potential for increased floods and landslides. Clearcuts do not hold soils well.

**Fire hazard reduction** - Wildfires have become an increasing concern to the community the past 10-15 years. Fires are becoming larger and harder to control. Increasing the amount of young stands will only contribute to this increased fire danger. A large percent of the area burned in the 2001 Quartz Fire in the Applegate Valley were plantations of up to 20 years old which burned intensely. Having more younger stands and less old growth trees will make our area more prone to wildfire hazards. I am concerned at present about the ability to grow larger trees in plantations in southern Oregon over the long term because of their susceptibility to wildfires. Making more clearcuts will make it more difficult to grow older trees.

**Rare plants and wildlife** – Southern Oregon is a very diverse place with many unique plants and wildlife. Having too many young timber stands without complex structures will reduce this diversity. This will trend towards listing of some species as Threatened or Endangered. Connections are important for wildlife species to move through habitats, especially for old-growth related species. BLM lands are important in keeping connections to the national forest lands for movements of species.

**Invasive species** - BLM has a great problem with noxious weeds in southern Oregon. These weeds often grow along roads, streams and areas where equipment moves off roads. These weeds are very harmful for the ecology of the land. Increases in land-based logging, road construction/re-construction, off-road vehicle use, use of infested seed or other material can introduce these weeds or spread existing sites. Over the past 20 years I've watched noxious weeds move aggressively in the Applegate Valley on BLM lands. The alternatives proposed in the DEIS will continue this practice.

**OHV Management** – I'm very concerned about the amount of area being considered for OHV use on the Medford District. This is a very controversial public issue and every year I see more damage from off-road use – people driving across meadows (not just once but numerous tracks across) and invasive weed infestations. There has been a great deal of impact in the Wagner Gap area where indiscriminate off-road driving has occurred. This is adjacent to the proposed Anderson Butte area.

One reason given for looking at 10 areas in the Medford District was that was where people had been using OHVs. Just because someone has been driving through there doesn't mean that it is a good idea. OHV use off of roads is causing soil disturbance, loss of vegetation, erosion, and movement of invasive weeds. My family enjoys the use of OHVs but I encourage their use on existing roads which we have plenty of and does not impact soils or vegetation.

I understand that the action alternatives would reduce the broad open areas that exist now which I do support but I would not like to see so many designated use areas proposed on the Medford District. We have seen in the John's Peak area that the motorcyclists do not stay on trails and also trespass onto private lands adjacent to the BLM areas. Even traveling over Endangered species in some instances. Due to the problem with being able to enforce authorized use in these areas, impacts to soils/vegetation, and potential for invasive species introduction/spread I urge you to reduce the areas being considered to just the John's Peak area.

**Alternative Selection** - I urge you to consider the "no action" alternative to maintain the existing management or design an alternative that is less impacting to the area while allowing for true sustained yield without impairing the productivity of the land. I believe that would be the best for the land, the community, and to sustain our ability to remove timber resources over the long-term. Here are a few reason (taken from the DEIS) why I believe that the No Action alternative is better than the Proposed Action (Alternative 2).

### **No action**

- Most decrease of fire severity and hazard in Medford District
- Lowest risk of invasive plant introduction
- Increase the acreage of fire-resilient forests
- Retention of structural legacies in regeneration harvested areas would result in structurally complex forest that develop almost twice as fast after harvesting compared to Alternatives 1 and 2
- Would reduce fragmentation in most physiographic provinces
- Little risk of loss of rare plant populations and extirpation or extinction of bureau sensitive plant species or bureau assessment plant species

### **Alternative 2**

- Least decrease in fire severity and hazard in Medford District
- Greatest risk of introduction of invasive plants based on levels of timber harvesting
- Decrease acreage of fire-resilient forests (creates forests without green tree retention)
- No retention of structural legacies in regeneration harvested areas would result in structurally complex forests that develop less than half as fast after harvesting compared to the No Action and Alternative 3
- Would increase fragmentation in most physiographic provinces
- Some rare plant populations on O&C lands would be lost and the risk of local extirpation or extinction to bureau sensitive plant species and bureau assessment plant species would increase

Thank you for consideration of my comments. BLM lands in southern Oregon are very important not only for providing economic return but for providing habitat for plants and animals and people in the community. To provide true sustainable yield we need to also provide for the health of the forest to grow trees well to replace those that are cut. Clearcuts of the past are not the way to manage a forest. Clearcuts in the past provided quick cutting of trees but have taken a longer time to attempt to re-grow a forest, especially in the hot, dry southwestern part of Oregon.

Sincerely,



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Cc: Tim Reuwsaat, Medford District BLM Manager  
Senator Ron Wyden  
Senator Gordon Smith  
Rep. Greg Walden  
Jackson County Commissioners