

ATTACHMENT 1

PUBLIC COMMENT TO MARI KELSEY TIMBER SALE IN THE KELSEY WHISKY LANDSCAPE MANAGEMENT AREA AND BLM RESPONSE

The Kelsey Whisky Landscape Management Area planning involved the public through three public scoping meetings in June, July and October, 1999; through accepting comments on development of alternatives and analysis of effects through March, 2001; through a 90-day comment period for the Draft Environmental Impact Statement (DEIS) from April 12 through July 12, 2002; and through a 30-day comment/protest period for the Final Environmental Impact Statement (FEIS) from March 21 through April 21, 2003. BLM received comments from the scoping as well as the two document review processes (DEIS: 145 comments; FEIS: 48 comments). The comments from the DEIS were evaluated and incorporated when revising the FEIS text. The evaluation of the comments is included in the FEIS as Appendix 15.

Two protests dealing with the exclusion of the Area of Critical Environmental Concern (ACEC) from the preferred alternative were filed with the Director of the BLM and were resolved in July 2003. From the protests the Director identified two major issues which concerned maintaining a late-successional corridor and inconsistency with the purpose and need by not designating an ACEC. The Director found the cumulative effects to be consistent with the goals and objectives of the Medford RMP and the Northwest Forest Plan, and would not diminish future opportunities for management. RMP Amendment decisions were made under the *Record of Decision for the Medford District Resource Management Plan Amendment in the Kelsey Whisky Landscape Management Area*.

To date, there have been four separate records of decision issued relating to the *March 2003 Kelsey Whisky Landscape Plan and Resource Management Plan Amendment and Final Environmental Impact Statement* (FEIS). The first is the Record of Decision, Medford District Resource Management Plan Amendment in the Kelsey Whisky Landscape Management Area, September 2003; the second is Record of Decision, Forest Health and Fuels Treatments in the Kelsey Whisky Landscape Management Area, November 2003; the third is the Record of Decision, Upper East Kelsey Timber Sale, November 2003; and the fourth is the Record of Decision, California Gulch Timber Sale, November, 2004.

Since the signing of the last Record of Decision (ROD), the Bureau of Land Management (BLM) has received 278 comment letters. BLM responses to public comments are found below and were considered in reaching a final decision for the Mari Kelsey Timber Sale.

If a number of comments are identical or very similar, agencies may group the comments and prepare a single answer for each group. Depending on the volume of comments received, responses may be made individually to each substantive comment or similar comment may be combined and a single response made. CEQ (40 CFR 1503.4) identifies five possible types of responses for use with environmental impact statements.

1. Modify alternatives including the proposed action.
2. Develop and evaluate alternatives not previously given serious consideration by the agency.
3. Supplement, improve or modify the analysis.
4. Make factual corrections.
5. Explain why the comments do not warrant further agency response, citing the sources, authorities or reasons which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.

The below organizes responses to comments submitted to BLM after the signature date of the last ROD.

1	Rich Penfield	2	Matthew A.	3	Kiley Faubian
4	Sharon Prow	5	Rose	6	Lauren Spector
7	George Wuerthner	8	unidentifiable	9	Clair Highfield
10	Brook Colby	11	Amber V.	12	Milhinzie Dillon
13	Jessica Dahl	14	Chad Derusier	15	Zachary Scholze
16	Jay Harold	17	Carol Ampil	18	Bridgette Luffe
19	unsigned (4-22-05)	20	Deidre Deen	21	Rachael Schneider
22	Mat Marr	23	Noah	24	Nicole Kay
25	Bryan Hathaway	26	Kristine Folds	27	Lauren Spector
28	Elizabeth T.	29	Bennett	30	K.G.
31	Jolaina Peltier	32	Camille & Emily	33	L.F.
34	Sara Anglin	35	Ada	36	Alison H.
37	Mark Breeden	38	Dirk Price	39	Janelle Krause
40	Walter Simpson	41	Golden	42	Alycia
43	Keven Sutton	44	Marsha Small	45	John Speere
46	unsigned	47	Rachel D.	48	Reed Bentley
49	unsigned	50	Haney	51	Kendra Werd
		52	Scott Becker	53	Jenna Gray
54	Amy Baldo	55	Autumn Higgins	56	Erika Read
57	Scarlett Hart	58	Jennifer J.	59	David Myers
60	Mariel C.	61	S. Kooli	62	Russell Wiegel
63	Katie Kleaveland	64	Mark Schott	65	Stacy Stanfill
66	Sarah Praskievicz	67	Tom Keenl	68	Gretchen Handke
69	Corey Webber	70	Jarrett Davidson	71	Cali S.
72	Laura Rost	73	Caleb Peterson	74	Kathryn Moon
75	Tara Brown	76	J.P.	77	Cole H.
78	Chris Ramsby	79	Kate F.	80	Rob Kaster
81	Angela Lenire	82	Matt Jost	83	Kevin K.
84	Nick Levine	85	Brooke A.	86	Hesid Branelov-Ysrael
87	Lane Bergeron	88	Jimmy Wu	89	Barbara Saliol
90	Jon Bergstrom	91	N.B.	92	Matt Tucker
93	Chris Schmidt	94	Lorrain Gonzileg	95	Adeline W.
96	E.K.	97	Diana Hensley	98	Blake Wilson
99	David Berretta	100	Jessica Lee	101	Will Sears
102	Kellie Johnson	103	Ax Prince	104	unidentifiable
105	Matthew Gantz	106	M.L.	107	Shannon Ludas Manuel
108	Lea Ford	109	Erick Bengil	110	Amy S.

111	Chris Colossi	112	Drew Geller	113	Katina Emrick
114	Pat Mayfield	115	Kristin M.	116	unsigned
117	R.H.	118	Chelsea Gustafson	119	Emily Benz
120	D.S.	121	Phil Clark	122	R. Kaska
123	Elizabeth	124	unidentifiable	125	Bailey Boemand
126	Ian Dooley	127	Ryan Holt	128	D. Spur
129	Ashley Arnoux	130	Jossalyn Bradbury	131	Nicola R.
132	Tom Graham	133	Sam Sorrentino	134	Jane Palmieri
135	Matt R.	136	M. Lubber	137	Pamela Freidel
138	Allison Moffitt	139	Lisa R.	140	M. Soti
141	Ian Taylor	142	Stephanie Jacobson	143	unidentifiable
144	Chris Downie	145	Tamra Perry	146	Adam Kelly
147	Jen Brown	148	James C.	149	Blaike B.
150	B.M.	151	Megan Donegan	152	Robin Bansen
153	B. Workinan-Mooralli	154	Liza Tran	155	Eric Lorsen
156	Ellen Falkner	157	Matt F.	158	Sean Smith
159	Tomas M.	160	Alice DiMicele	161	Catherine F.
162	Esther Goldberg	163	Ian Gadberry	164	Diana Kuhlke
165	Justin Rohde	166	Sarah Hale	167	Rose
168	R.T.	169	unidentifiable	170	Danielle McNeill
171	Terry Terrall	172	C. Cotton	173	Peter McCarville
174	Jessica Harris	175	Matt M.	176	Daryl Jackson
177	Carole Jale	178	Alice Reid	179	Kate Lindstrow
180	Nina L.	181	Judy Gin	182	Brian Clark
183	Lyn Wardell	184	Dayton Yamashita	185	Greg
186	Tom Peil	187	Sean Nelson	188	Ann Marie Larquier
189	Cathleen Katz	190	Aaron Maxwell	191	Darby Fallen
192	Jim Freeberg	193	Katie K.	194	Alison Blakeslee
195	Nate Moon	196	Bekkah McAlvase	197	Alexandra Rundle
198	Luke Ruedleer	199	Malena Marvin	200	Craig C.
201	R.C.	202	Shelly Pickett	203	Marsha King-Rosine
204	Dylan Clark	205	Stephanie Skidmore	206	Patrick R.
207	K. Reynolds	208	Savarino Parisi	209	Kristin Robinson
210	Colin Murphy	211	Suzia Fakukeide	212	Shannon Bigham
213	G. Myer	214	Trevor Hagstrom	215	Erin Mayfield
216	Joy Kieras	217	Jeff Markland	218	D.D
219	Jody Folkedale	220	unidentifiable	221	Eva
222	A.T.	223	Anne O.	224	Katy Mike Sonaistria
225	Renee Waterhouse	226	unsigned	227	T. Kelly
228	L. Carnis	229	Jeshna	230	Liby L.
231	Georgia Prince	232	Callie Smock	233	unidentifiable
234	unidentifiable	235	Kelsie Pakenbush	236	Shane Records
237	J.C.	238	Steve Ryan	239	J.R.
240	Spencer James Godard	241	Shadassa Ourshalimian	242	Shana Nunneley
243	Gabrel Gonzales	244	Nevin Freeman	245	Vanessa Blount
246	Laura Newton	247	Marjorie Gosling	248	Michael Bulkin
249	Josh Williams	250	Caitlin Maddigan	251	Ellie Armstrong

252	Sylvia Van Ausdal	253	Gina Tritz	254	Patrick Burton
255	Ursula Barton	256	Katrine Dowell	257	H. D.
258	Leticia Gonzilez	259	J. Lane	260	Pat T.
261	unidentifiable	262	unsigned	263	unidentifiable
264	unidentifiable	265	Susan Menanno	266	Suzanna Mariner
267	Helen	268	Carolyn Eckel	269	Holly Christiansen
270	Sharon Bywater	271	Brian Bodah	272	Lydia Garvey
273	unidentified phone message	274	Sally	275	Don Brown
276	David Mildrexler	277	Yoko Silk	278	Robert Merriam

Comment 1: *A number of letters from the public refer to the opposition of old growth logging or timber harvesting in general within the Kelsey Whisky Planning Area, and/or interchange the word clearcutting with regeneration harvesting that leaves at least 6-8 trees per acre (commenters: 1, 4-9, 11-21, 23-35, 37- 40, 42-45, 47, 49-54, 56-58, 60, 61, 64-67, 69, 70, 72, 74, 75, 77- 85, 87, 88, 91, 93-102, 104, 105, 107-109, 111-114, 116-119, 121-125, 127-130, 132-134, 136-142, 144-148, 151, 152, 154-167, 169-175, 177-180, 182, 183, 186, 188, 189, 192, 197, 198, 200, 201, 202, 204-206, 208-210, 212, 213, 215, 217-221, 223-227, 229, 230, 232-235, 241-261, 263, 264, 266, 267, 268, 269, 270, 271-278).*

BLM Response: These similar comments regarding the concern of cutting old growth trees were responded to under Appendix 15 of the FEIS (A-160):

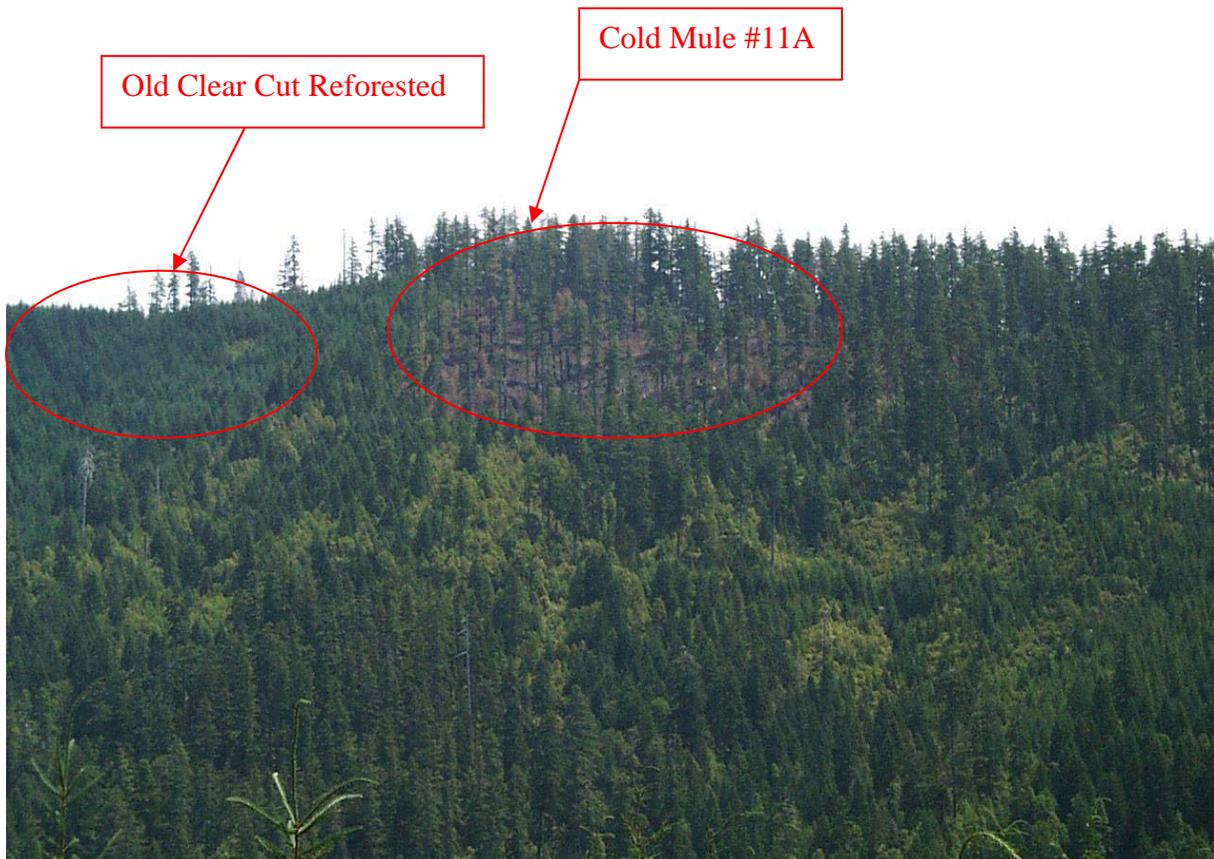
The concerns of whether to harvest old-growth trees, whether to allow commercial timber harvest of these lands, or whether to use timber harvest in general, to achieve landscape management objectives was already decided upon. The Medford District BLM has already completed an Environmental Impact Statement for the Resource Management Plan, known as the 1995 Medford District Resource Management Plan/Environmental Impact Statement (RMP-EIS). The RMP is itself an implementation of the Northwest Forest Plan (NFP) which was also prepared by federal agencies, including the BLM. These EISs, and the corresponding RODs [Record of Decisions], specifically contemplated the ecological significance of the areas in which commercial and non-commercial timber harvest activities would be planned. The Kelsey Whisky EIS conforms to the analysis of these impacts already contained in these programmatic EISs.

The Glendale Resource Area of the Medford Bureau of Land Management has invited local residents and environmental groups to attend three public meetings conducted since 1999, including a field trip to the Project Area in January 2005 with Southern Oregon University students and several members of the interdisciplinary team of the FEIS to explain the timber project development, interdisciplinary input and the National Environmental Policy Act (NEPA) process for environmental analysis.

The below photos are provided to demonstrate the after affects of harvesting and have been acknowledged by local residents as representative characterizations of BLM post harvest effects. The first photo is taken of Unit #3 of the Lost Fortune Timber Sale after harvest. Approximately 10 large trees per acre were retained in this overstory removal.



Below is a recent photograph of Cold Mule unit #11A, which was treated with a regeneration harvest in 2000. Unit #11A is located in the center of the photo and retains approximately 7-9 trees per acre, as required by the Medford Resource Management Plan. In comparison the young stand to the left is an old “clearcut” harvest from the 1960’s now reforested.



Comment 2: *“There are plenty of places to log. Why use this forest?” (57, 87, 256)*

BLM Response: The Mari Kelsey Timber Sale is located on matrix lands which are designated for permanent sustainable forest production. Since Matrix lands compose only 20% of the Medford District’s land base, flexibility for selecting areas for harvest is limited with meeting the objective of harvesting stands before culmination occurs. Stand harvesting may occur at any age above a minimum harvest age set to meet economic and logging-practicality requirements. The sustainable harvest level is highest if minimum harvest age is set at the lowest economically practical age. Over time, however, rotation lengths would approach the age of culmination of

mean annual increment (CMAI). For most regimes and sites in southwestern Oregon, CMAI occurs near 100 years of age (RMP, p.181). The Medford RMP identified a minimum age for regeneration harvesting at 100 years (RMP, p. 74).

Comment 3: *Commenter 172 stated their disfavor for selling these lands.*

BLM Response: There appears to be a misunderstanding by the commenter. The timber is proposed for sale, not the land. The land would remain as public land, managed by the BLM.

Comment 4: *Several commenters expressed concern for future generations to see and enjoy the forests. (10, 25, 39, 11, 49, 71, 73, 82, 86, 88, 92, 94, 108, 131, 137, 141, 155, 156, 158, 163, 170, 178, 180, 185, 191, 197, 206, 217, 224, 245, 247, 253)*

BLM Response: The Northwest Forest Plan (NFP) was developed in response to controversy over the northern spotted owl and old-growth federal forests of the Pacific Northwest. President Clinton at that time set forth five principles to guide the development of the NFP. The land allocations and Standards and Guidelines in the NFP satisfy the objectives by the President, which comply with the requirements of federal law, are based on the best available science, are ecologically sound, will protect the long-term health of the federal forests, and will provide a steady supply of timber sales and non-timber resources that can be sustained over the long term without degrading the health of the forest or other environmental resources (NFP ROD, pp. 3, 4).

Comment 5: *This commenter (46) stated, the six to eight leave tree for regeneration harvest seemed a bit heavy and has concern that too much regeneration harvesting would cause an increase in ladder fuels. "I do support logging fir around sugar and ponderosa pine to increase pine regeneration. Fir regeneration in southern Oregon however, is a problem, not the solution." Other commenters had concerns about the increased risk for wildfire after harvesting (269).*

BLM Response: Plantations, although they may present an area with increased fire rates of spread due to the presence of flashier fuels, may also provide areas in which effective and efficient fire suppression operations can occur (Martin, C., 2006. Fire Ecologist, Medford District, BLM. *Personal communications to run Behave3 and FMAPlus 2 fire behavior computer models.* May 31, 2006. Medford, OR). For example, air attack operations with air tankers and helicopters are generally less effective in stands with taller trees and closed canopies. Also, access through managed areas is already in existence, meaning mechanical equipment such as dozers can be used in a much more efficient manner. Existing fire barriers, such as roads and firelines, may also already exist in managed areas, meaning fire control lines take less time construct than in older stands, in most instances (Martin, 2006)

Scientific evidence exists supporting the notion that plantations are vulnerable to fire and may exacerbate fire behavior, particularly during times of dry conditions and in stands that have received slash-producing maintenance treatments (such as pre-commercial thinning) where the slash remains on site and is not mitigated (Martin, 2006). However, in most instances, monitoring plots taken in older stands in the local area reveal that the number of small trees (up to 8 inches dbh) with varying heights are at such levels of abundance that these stands are also

vulnerable to fire and have the potential to produce catastrophic fire behavior during dry conditions (Martin, 2006). Computer modeling provides a method for comparing the effects of various management prescriptions on fire behavior. Behave3 allows the user to input local stand characteristics and weather parameters in order to determine flame length and rate of spread. Recent sample data generated for a similar timber sale within the Glendale Resource Area produced the following results: the high end of the range for flame lengths in mature stands (8 feet) exceeded the high end in early seral stands (7 feet) and mid-closed stands (3 feet) that are indicative of plantations.

The commenter has not identified how fir regeneration is a ‘problem’ in southern Oregon. Douglas fir is a natural component of forests in southern Oregon and is the natural dominant tree species for this region as identified in the Kelsey Whisky FEIS (Appendix 13. Silvicultural Prescription for Alternative 1, p. A-91), “Stands proposed for treatment can be categorized as being Mixed Evergreen or Mixed Conifer as described by Franklin and Dyrness in Natural Vegetation of Oregon and Washington (1973). Units are in the tanoak and Douglas fir series. Douglas fir is the primary conifer species. Ponderosa pine, sugar pine, and incense cedar occur within the project area. Primarily hardwood [evergreens] and shrub species include Pacific madrone, golden chinquapin, tanoak, canyon live oak, rhododendron, and salal.”

Comment 6: *“I don’t want forest fires in the Zane Grey Roadless Area. Cutting old-growth is not the way to accomplish this goal.”* (103)

BLM Response: The primary objective of the Mari Kelsey Timber Sale is not hazardous fuels reduction, but rather timber extraction. Refer to response to Comment 5 regarding fire hazard after harvest.

Comment 7: *Several commenters recognized the need for timber to produce materials, however they questioned the sustainability, stand recovery, and economics of harvesting old growth. “I understand the need for lumber and income which could come from the Kelsey-Whisky timber sale. However, the truth is income wouldn’t be great and the timber would run out sooner or later.”* (142, 241). *“Yes, wood is an important and valuable resource commodity and replanting is viable, but it would take approximately 1,000 years to re-grow an old-growth forest with the essential ecosystem for the particular species that depend on these limited few remaining areas.”* (242). *“I do believe that logging is necessary for many reasons, like manufacturing, yet it seems that cutting down portions of the old-growth forest is extremely unnecessary. If logging companies say they re-plant trees in these areas that have been cut down, then there should be no reason for them not to cut down those trees.”* (63, 129, 252). *“I realize the BLM like many government agencies is in economic decline, and the few remaining old-growth sales would produce revenue. I do not believe that there are enough old growth forests left to rejuvenate government employment. Moreover, it is critical that our forest management practices begin to focus on managing in a sustainable fashion. There are plenty of second and third growth forests to provide a reasonable working timber and product industry.”* (126).

BLM Response: The Medford RMP (p. 9) provides management direction for old-growth and mature forest habitat. Of the total 859,096 acres of Medford BLM managed lands, 497,500 acres are to be managed for retention and development of older forest (LSRs, riparian reserves and

other lands not available for timber harvest). The RMP identifies that lands available for scheduled timber harvest total 191,000 acres. Given the amount of acres available for harvesting, there is no risk of rapidly cutting old growth or commercial timber on Medford BLM managed lands.

How do we manage in conformance with Sustained Yield under the RMP?

The determination of the annual productive capacity is based upon the calculation of the Allowable Sale Quantity. In this calculation the current forest inventory is used to project over many hundreds of years the management practices outlined in the plan to demonstrate the harvest levels are sustainable. With plan revisions and new inventories the annual productive capacity is reassessed and is declared in the Record of Decision for the next implementation period.

Given that prior to the NFP the BLM was enjoined and not harvesting timber and under the NFP 80%+ of the lands have been managed for late-successional forest objectives, and the harvest rates in the matrix have not met anticipated levels over the last decade it could be expected that we are gaining in standing inventory over previous estimates.

Comment 8: *Several commenters questioned the sustainability and economics of harvesting old growth. Short-term profit of logging old-growth does not compare to the cost of restoring damaged watersheds created by logging. Logging may bring profit at first, but what about ten years from now? There are many employment opportunities available through work in road decommissioning and closure, manual treatment of fuel loadings, and plantation thinning. Recent polls indicate that 75% of Oregonians do not support old-growth logging, and in rural counties that depend more directly on the wood products industry, 67% do not support old-growth logging. (4, 225, 228, 234). “It is time the region recognizes the need to find alternative, sustainable income sources, and move away from logging.” (72). When most timber sales are sold at a loss, it is evident that the BLM priorities are private interest. I believe that the conservation of our forests exceeds the requirement of utilizing the natural resources that the Oregon land has to offer. The only foreseeable gain would be the temporary increase of jobs. But, as an industry that conducts business in a self-destructive manner of both the industry itself and the environment, there are only minor short-term gains and a future of devastation. (249).*

BLM Response: See response to “7.” One of the primary objectives identified in the RMP is implementing the O & C Lands Act which requires the Secretary of the Interior to manage O&C lands for permanent forest production in accord with sustained yield principles (ROD/RMP, p.17).

Comment 9: *Several commenters expressed stand recovery concerns. “During the Dutch Kelsey Timber Sale in 1983, 305 acres were clearcut, and now only small trees and shrubs have grown over the past twenty years. With 9.8 million feet logged, this would take years and years for small trees to grow back.” “With this project, 20% of the old growth forest, the spotted owl’s habitat, would be destroyed. 60% of the canopy of the forest is going to be removed by commercial thinning and up to 12 million feet can be logged.” (45, 251)*

BLM Response: See response to “7.”

Comment 10: *“Our ecology is fine the way it is and the ozone is tearing the more we burn trees.” (229).*

BLM Response: The burning of trees does not contribute to the depletion of the ozone layer. If you are referring to the ozone hole, it is caused by chlorine and bromine gases in the stratosphere that destroy ozone. These gases come from human-produced chemicals such as chlorofluorocarbons, otherwise called CFCs.

Comment 11: *“Please protect all LSRs even after a forest fire. Allow the forest to regenerate on its own and not by timber companies who salvage log damaging the fragile post fire ecosystem and then plant tree farms causing hot intense fire.” (262)*

BLM Response: The Mari Kelsey Timber Sale is located in Matrix land not an LSR. This timber sale is not a post fire salvage sale.

Comment 12: *“There is no reason for you or the BLM to choose a site with such high recreational use.” Several commenters stated they use the area for hiking, fishing, camping, rafting, kayaking. One identified hiking within the Wild and Scenic Rogue River corridor. Other commenters requested this stretch of the Wild and Scenic Rogue River be preserved. (5, 12, 18, 20, 23, 40, 49, 52, 53, 56, 62, 64, 67, 68, 69, 70, 75, 89, 94, 95, 100, 130, 137, 144, 148, 149, 151, 152, 153, 166, 176, 177, 185, 186, 193, 207, 209, 211, 216, 220, 226, 231, 260, 268, 269, 276, 277).*

BLM Response: The decision has already been made to allocate these lands as Matrix for the primary purposes of timber production under the Record of Decision for the Northwest Forest Plan. Twenty percent of the federal ownership of the federal forests in the Pacific Northwest are Matrix, while the remaining 80% are designated as reserves (Congressional, riparian, and late successional) for the purpose of developing or retaining old-growth. The effects to recreational use in the Planning Area was analyzed in the FEIS, “All alternatives would present little or no impact on existing recreation uses within the area...recreation use in the planning area is focused and concentrated within the boundaries of the Rogue National Wild and Scenic River. Recreational activities occurring within the river corridor would be minimally affected by any of the alternatives, if at all. Neither the Grave Creek to Marial or Galice-Hellgate National Back Country Byways would be adversely affected by any of the alternatives. Dispersed recreation activities which occur along the other existing roads and those activities in unroaded areas within the planning area would not be affected by any of the alternatives. Those areas would continue to remain open to the same type of use it currently experiences.” (FEIS, pp. 4-41, 4-42).

The Mari Kelsey Timber Sale does not propose any harvest units within the Wild and Scenic Rogue River corridor so recreational use of the river would not be affected.

Comment 13: *Several commenters noted the value of tourism on Oregon’s economy. Others stated eco-tourism is the route to increase jobs and clearcutting does not support our long-term economy. A compilation of comments stated the economic, recreational, historical, and spiritual benefits of preserving this land exceed the short-term profit of old-growth logging. The state of*

Oregon gains extensive revenues from these pristine areas that are completely unique upon the face of this Earth, travelers come from around the world to see, visit and explore these areas for the unique experience that is like no other place on Earth through hiking, fishing, swimming, animal viewing, and various boating experiences. Forests provide millions of dollars to the surrounding Rogue Valley in commercial activity every year. (4, 16, 21, 31, 42, 48, 57, 66, 115, 183, 199, 213, 253).

BLM response: See response to comment 1 regarding the decision to log old growth forests. See response to 8.

Comment 14: *“Last year I wrote an extensive paper on old growth forests. Through my research, I interviewed several professionals and they all told me the same thing: old growth forests are invaluable.” (37).*

BLM Response: Twenty percent of the federal ownership of the federal forests in the Pacific Northwest are Matrix, while the remaining 80% are designated as reserves (Congressional, riparian, and late successional) for the purpose of developing or retaining old-growth. The Mari Kelsey Timber Sale is located on matrix lands which are designated for permanent sustainable forest production.

Comment 15: *“The damage done by the removal of this old growth area would be more devastating compared to the benefits. Only 5% of old growth forests are left here in the west coast.” (257) Another commenter states, “This area makes up part of the 3% of virgin old growth forests left in the nation.” (112).*

BLM Response: The Salem, Eugene, Roseburg, Coos Bay, Medford, and Klamath Fall BLM Districts are revising their resource management plans into one consolidated management plan for western Oregon named, “The Western Oregon Plan Revision”. A series of documents were released to the public that provides the structure for this revision including the “Analysis of the Management Situation” (AMS) document. This document summarizes updates and findings of the current conditions for western Oregon’s BLM land as well as identification of current concerns. Since the BLM does not have jurisdiction over lands managed by other federal, state, and local governments, nor private land, it cannot control the harvesting of old growth timber on such lands. However, page 22 of the AMS notes that “15% of BLM land in western Oregon is old-growth” and is defined as trees greater than 200 years of age for purposes of this inventory.

Comment 16: *Several commenters mentioned the majority of comments received on the Draft Kelsey Whisky EIS (140 out of 144 letters received) opposed timber harvesting in the project area. Such commenters made statement. They questioned whether the BLM has not given the necessary consideration of this public input and voiced it is the responsibility of your organization to take into account the views of local, politically active citizens, as well as the important environmental impact. (4, 28, 45, 51, 61, 115, 124, 199, 223, 243, 244, 245, 249, 251, 254, 255, 271, 276, 278).*

BLM Response: While the BLM encourages public input on this and other National Environmental Policy Act (NEPA) documents released for public comment, this input is not a

form of voting. Rather the purpose of this input is to ensure adequacy of statements made or identification of site specific issues that individuals may have additional information on to incorporate as part of the analysis. As stated in response to comment 1, the decision to log old growth forests has already been made through the Northwest Forest Plan and Medford District Resource Management Plan.

However, it is important to recognize that frequently the volume of comment letters received on such projects are focused on opposition while those that support such projects in the community may submit a few letters or remain silent. Therefore, BLM does not believe that there is any true “social consensus” regarding the BLM’s management of timbered lands in Oregon. If there is a “social consensus,” it is found in the Congressional directive of the O&C Act to produce a sustainable supply of timber from these lands. Until Congress provides different direction, BLM will continue to follow present management direction. The Glendale Resource Area extensively responded to the comments received through the 144 comment letters received on the Draft EIS (FEIS, pp. A-160-172).

Comment 17: *“I am writing to you as a concerned community member for the safety and preservation of the old growth forests within the Kelsey-Whisky region. Most of the proposed logging is in areas where spotted owls thrive. Old growth forests are their only habitat, as well as a few other animals. How can we take away the only habitat they have left? I also question the long term effects, the impact on which the logging will have on the area. We are not talking selective thinning, but commercial logging. 930 acres will be subject to this, including approximately 1.5 miles of clear cutting to make way for roads and other spaces to accommodate the retrieval of the timber.” (Direct quote from 245, similar comments received on the concern for the spotted owl from 198, 213, 247, 248, 250, 251, 252, 253, 245, 276).*

BLM Response: Neither the Mari Kelsey Timber Sale nor any other timber sale produced from the Kelsey Whisky FEIS would eliminate the remaining portion of spotted owl habitat. Consultation on acres proposed for removal and degrading for the Mari Kelsey Timber Sale was initiated with United States Fish and Wildlife (USFWS) through the FY06-08 Biological Assessment. The USFWS replied with a Biological Opinion in August 2006, stating among various other management activities proposed, the Mari Kelsey Timber Sale would not contribute to jeopardizing this species or need to list this species from threatened to endangered.

Comment 18: *A few commenters believed the BLM is a private timber company. (235, 249)*

BLM Response: The BLM is not a private timber company. It is part of the Department of Interior, formed to implement multiple resource use objectives, including sustainable timber production. The U.S. Congressional directive of the Oregon & California Act of 1937 directed the BLM to produce a sustainable supply of timber from these lands. The BLM will continue to follow present management direction until Congress provides different direction.

Comment 19: *Several commenters made general statements regarding concern for wildlife harm or survivability as a result of timber harvesting. (18, 21, 55, 63, 65, 68, 81, 88, 92, 95, 103, 112, 119, 124, 131, 133, 147, 150, 156, 158, 179, 180, 189, 191, 193, 200, 231, 268, 276). Others voiced concern for endangered species and critical habitat (6, 188, 198). “By cutting down this*

forest area over 45,000 acres are endangered.” (28). “Species are becoming more and more endangered by these kinds of aggressive resource extraction. I’m strongly against this logging, it is more valuable than just its lumber.”

BLM Response: Chapter 4 of the FEIS contains a detailed analysis of the anticipated effects on wildlife and critical habitat from the proposed timber harvesting. Also see response to comment 17 concerning compliance with the Endangered Species Act.

Comment 20: *Several commenters have general concerns about air quality as a result of harvesting or others stated a concern about the availability of oxygen. One individual mentioned concern to an increase in asthma risks (3, 47, 55, 114, 119, 131, 178, 181, 194).*

BLM Response: The scale of this timber sale or the other proposed harvesting within the Kelsey Whisky FEIS, would not affect oxygen availability nor increase the risk for asthma. Areas harvested by regeneration harvest will be planted within the same year so the cycle of oxygen produced by trees may continue.

Comment 21: *A few commenters stated they oppose new road construction or did not understand the need for additional road construction in consideration of the amount of roads on public land, new road construction would be unnecessary. (147, 230).*

BLM Response:

Temporary and permanent road construction is proposed to access treatment units where no roads exist or road conditions are overgrown and inaccessible. Units without current accessibility considered helicopter logging.

Helicopter yarding is used instead of tractor or cable yarding methods for such reasons as limited access due the high cost of building roads or risk sedimentation from mid-slope road building. The costs for helicopter logging are much higher than conventional harvesting systems. The appraisal costs for helicopter yarding with the Boeing BV-234 is \$5,400 an hour with a consumption of 405 gallons of jet fuel an hour. A heavy helicopter such as a Boeing BV-234 can lift up to 10,000 pounds and would be needed for trees with over 1,000 pounds (greater than 24 inches DBH). A small heavy helicopter such as a K-Max can lift up to 5,000 pounds and can be used for logs less than 1,000 pound (less than 24 inches DBH). Move in costs would be approximately \$10,000 per ship.

As an example the appraisal cost of helicopter yarding came out to \$302/mbf, the cost for cable yarding system came out to \$139/mbf on the Willy Slide Timber Sale.

Temporary roads do not contribute to the overall road density since they are decommissioned after use (ripped with a winged subsoiler, waterbarred, mulched and seeded).

Comment 22: *One commenter expressed concerned clearcutting will cause mud slides (234).*

BLM Response: The BLM has not practiced the “clearcutting” method of harvesting since the Record of Decision of the Northwest Forest Plan, 1995. “All harvest units as well as proposed

road locations would be on stable ground” (FEIS, p. 4-4). The proposed timber harvesting with the implementation of Best Management Practices to minimize soil disturbance would not cause mud slides to occur. Refer to response to comment 1 for photographs of regeneration and overstory removal methods of harvesting timber under the Northwest Forest Plan.

Comment 23: *A number of letters from the public refer to the Kelsey Whisky area as the Zane Grey Area and regarding it as roadless area or wilderness area. There were numerous comments requesting no logging, no additional roads be built within this area, and requested it to be designated as wilderness. In fact, several commenters refer to it as “one of the only roadless areas in the U.S.” or as “the largest roadless area in the U.S.” Others stated the long-term ecological, economic, and recreational values of the Zane Grey better serve the American public than the short-term profit of logging. Other commenters believe the “Zane Grey is one of the only old growth forests left in Oregon”. (48). “Despite overwhelming opinion to protect old-growth and roadless forests, including 2/3rds of Oregonians, the BLM continues to convert the public’s old growth forests into tree plantations. Elected officials, fishermen, rafting companies, the Native Plant Society, local landowners and concerned citizens have asked that the BLM spare the older forests in the Kelsey-Whisky project area, and to protect the Zane Grey as a Wilderness Area.” (commenters: 9, 12, 15, 18, 20, 21, 23, 25, 29, 33, 34, 38, 39, 45, 61, 66, 68, 70-72, 77, 83, 89, 92, 95, 97, 98, 101, 107, 112, 118, 121-123, 127, 129, 132-134, 138-142, 144, 145, 151, 154, 157, 160-162, 165-167, 174, 175, 177, 179, 181, 183, 188-190, 195-197, 201, 203, 205, 213, 215, 218-220, 222, 224, 230, 258, 264, 268-271, 276, 277)*

BLM Response: The Federal Land Policy and Management Act (FLPMA), section 603 required the BLM to conduct a one-time wilderness review, which included an inventory of roadless areas. In compliance with FLPMA, a wilderness inventory of the Zane Grey Unit 11-16 was completed in 1980 with boundaries that were drawn to conform to the appropriate sections of FLPMA and the Oregon and California Railroad Act. At the end of the inventory phase, the unit was removed from further study as it was found to lack sufficient wilderness characteristics. The Oregon Wilderness Coalition filed a protest in 1980 and an appeal in 1981. The Interior Board of Land Appeals affirmed the decision of the Oregon BLM State Office, February 2, 1983 (IBLA 81-626).

Since the area referred to as the Zane Grey area does not fit the official criteria for a “roadless area”, it can not be the largest or one of the few “roadless areas” left managed by the BLM.

In addition, the FEIS notes, “a high percentage of the area [“Zane Grey Area”] is land allocated for Late Successional Reserve by the Northwest Forest Plan. An extensive area is also identified as the corridor for the Wild and Scenic Rogue River.” These portions of the “Zane Grey Area” will be unaffected by the Mari Kelsey Timber Sale as it is limited to the Matrix land use allocation.

Also refer to response to comment 15 regarding the amount of old growth forests left in Oregon and response to comment 16 regarding “public opinion” on old growth forests.

Comment 24: “Zane Grey provides some of the best Salmon and Steelhead habitat in the Rogue River watershed...Zane Grey is the largest, and one of the most biologically rich, forested roadless areas administered by the BLM in the nation.” (4, 77, 198, 204)

BLM Response: A Biological Assessment describing the project and its effects and maps detailing the project location was submitted to National Marine Fisheries Service (known as NOAA Fisheries at the time at the time of consultation). The Service replied in a Letter of Concurrence, that a “not likely to adversely affect” determination was found. The FEIS also states (p. 4-39), “Because all proposals are consistent with the Aquatic Conservation Strategy (ACS), they would prevent or minimize any adverse effects on aquatic species, their habitat, and to water quality.”

Comment 25: *Several commenters expressed their concern for water temperature, fish species survival, water availability, and water quality including risks of erosion and sedimentation. (63, 22, 138, 141, 143, 158, 172, 176, 181, 198, 269, 276). “I am also worried about the impact on the nearby water sources, especially the Kelsey and Meadow Creeks. With the general heating up of the planet, we should be supplying water in ways with as much coverage as possible, instead of diminishing it. With the destruction of the surrounding forests the creeks are going to heat up quickly killing fish and hurting other aquatic life.” (247).*

BLM Response: “Temperature regimes in all of the streams are likely to be maintained over both the short term and long term since full ACS [Aquatic Conservation Strategy] compliance has been prescribed for all action alternatives.” All streams and each riparian zone adjacent to proposed activities and units will receive Riparian Reserve buffers as established by the Northwest Forest Plan and noted in the Medford District RMP (pp. 26-27) to maintain and restore riparian structures and functions such as the primary and secondary shade zones for temperature. See response to comment 24 regarding fish survival. As such along with the implementation of Best Management Practices, it is not anticipated that there will be any affect on water availability. The FEIS (p. 4-7) acknowledges some affects regarding sediment, “Both Alternative 1 and Alternative 2 would likely result in some unquantified sediment transport in the immediate vicinity of the disturbance caused by road building. It is unlikely to have any effect on streams since the road locations are ridge top and upper slope and avoid unstable areas. Sediment generated by construction activities would not be expected to move more than 100 feet off site (USDA 1989). In compliance with the RMP, straw mulching exposed areas, installation of water dips, surfacing roads, and gating of other roads in the area are all efforts that would be employed to stop or minimize sediment transport to streams.” Kelsey Creek is a fish bearing stream and is functioning properly (FEIS, p. A-158). Meadow Creek is also properly functioning from a hydrologic standpoint.

Comment 26: *“I hold that Oregon possesses the greatest wealth of diversity and beauty in its wild lands. The wilderness of the Rogue River watershed is key in maintaining Oregon’s priceless beauty. (30, 20, 22, 205).*

BLM Response: The Kelsey Whisky FEIS does not propose any activities in the Wild Rogue Wilderness Area. It is located to the west of the Project Area. See Map 4 – Alternative 1 Proposed Vegetation and Road Treatments of the FEIS. Also refer to response to comment 23.

Comment 27: *Several commenters supported the practice of thinning previously harvested stands to reduce wildfire risk or as a source for wood products. (39, 40, 43, 63, 105, 154, 250, 269)*

BLM Response: See response to comment 2 concerning stand harvesting method and response to comment 5 concerning fire risk.

Comment 28: *Commenter expressed frustration with the proposed Area of Critical Environmental Concern (ACEC) dropped.*

BLM Response: The Mari Kelsey Timber Sale does not propose any harvest units within the proposed ACEC and as such, would not diminish future opportunities for management.