



Wicks, Robyn <rwicks@blm.gov>

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## Trail Creek Forest Management EA - comments

2 messages

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**Doug Heiken** <dh@oregonwild.org>

Mon, Mar 3, 2014 at 2:35 PM

To: BLM\_OR\_MD\_Mail@blm.gov

Cc: j5willia@blm.gov, George Sexton <gs@kswild.org>

FROM: Doug Heiken, Oregon Wild | PO Box 11648, Eugene, OR 97440 | 541-344-0675 |

[dh@oregonwild.org](mailto:dh@oregonwild.org)

TO: [BLM\\_OR\\_MD\\_Mail@blm.gov](mailto:BLM_OR_MD_Mail@blm.gov)

ATTN: Jean Williams

CC: [j5willia@blm.gov](mailto:j5willia@blm.gov), [gs@kswild.org](mailto:gs@kswild.org)

DATE: 3 March 2014

**RE: Trail Creek Forest Management EA - comments**

Please accept the following supplemental comments from Oregon Wild regarding the proposed Trail Creek Forest Management EA, [http://www.blm.gov/or/districts/medford/plans/files/TrailCreekEA\\_web1.pdf](http://www.blm.gov/or/districts/medford/plans/files/TrailCreekEA_web1.pdf). Oregon Wild represents approximately 10,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife and waters as an enduring legacy.

Public lands should be managed for public values like: clean water, fish & wildlife habitat, carbon storage, recreation, and quality of life. Unfortunately, for many decades BLM management focused on commodity production to the detriment of these public values. Now the forests need to be carefully conserved and protect so the damage of past practices can heal and so that in the future these lands can provide public values in abundance.

Timber production for economic reasons degrades and diminishes most of these public values and it is simply not necessary because the wood supply can be provided from non-federal lands.

Certain aspects of this project do not appear to be consistent with the public interest, in particular:

- Construction of new roads is not in the public interest. Roads have serious adverse effects on soil, water, wildlife, weeds, and carbon. There are already too many roads on BLM lands, which prevents these public lands from meeting public objectives. Building more roads will make things worse, when BLM should be emphasizing efforts to reduce roads density.
- When conducting active management in suitable owl habitat, we urge BLM to retain OPTIMAL levels of large trees, canopy cover, snags, dead wood, and understory vegetation, rather than the bare minimum levels that define suitable habitat.
- Logging large trees will not advance but rather set-back restoration goals. Large trees both live and dead play important ecological roles. There is no valid ecological rationale for removing them. The EA needs to more clearly describe the ecological costs of large tree removal.
- Regeneration logging will cause several significant adverse effects, including: increased fire hazard, reduced habitat values, significant and long-lasting carbon emissions, etc.

BLM's excuses for regen harvest are not ecologically sound. The slowing of stand growth is a natural process. Stands continue to grow and add biomass for centuries after CMAI. Competition between trees is also a natural process. It causes selective mortality which increases the diversity of habitat structures within a developing late successional stand. These are not reasons to log, but reasons to conserve forests that are experiencing natural processes.

- Logging in riparian reserves is prohibited, unless it is "needed" for ecological reasons. BLM must provide any compelling rationale before logging in riparian reserves. Logging will do more harm than good if it removes commercial sized logs that can provide aquatic and terrestrial function.

Page 141 of the EA discusses the problem of drought stress which can lead to carbon starvation. If the EA is going to use this as a justification for density reduction, they should also discuss the fact that the atmosphere has 30% more carbon than it did 100 years ago. This means that plants do not have to leave their stomata open as long in order to get the carbon they need. The current CO<sub>2</sub>-enriched atmosphere thus makes plants more drought tolerant, so the need for density reduction may not be as significant as described in the EA.

The EA should also discuss the effect of logging on carbon storage. Logging will transfer carbon from the forest to the atmosphere. This will exacerbate global warming and cause serious effects around the world.

Sincerely,  
/s/

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Mon, Mar 3, 2014 at 2:50 PM

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