

----- Forwarded message -----

From: **Annette Parsons** [REDACTED]
Date: Mon, Aug 17, 2015 at 6:59 AM
Subject: Our comments on Draft RMP
To: blm_or_rmpwo_comments@blm.gov
Cc: [REDACTED]

Attached are our comments on the draft RMP. Thank you.

Jim Clover and Annette Parsons
[REDACTED]

Jerome E. Perez
State Director
Washington/Oregon
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97208

DATE: August 17, 2015
ATTN: Mark Brown

RE: Comments on the Draft Resource Management Plan for Western Oregon

Dear Director Perez:

We are owners of forestland in, and residents of the [REDACTED] in southwest Oregon for over 20 years and are active non-motorized users of our public lands for hiking, running, horseback riding, and camping.

We have some concerns with the BLM's Draft Revisions of the Resource Management Plan for western Oregon, and in particular, for the Medford District, where we spend so much of our time.

We realize that creating a management plan for such a grand land base is no simple task, but the confusing presentation of data and alternatives, and the many inconsistencies in data and figures makes it extremely difficult for we mere mortals to analyze the data and options presented and to be able to make meaningful and constructive comments. We support the more detailed and substantive comments provided by the Environmental Coalition, Siskiyou Upland Trails Association, and Applegate Trails Association, and we share the values and concerns they address.

The Bureau of Land Management lands that surround our home and all of the many homes in the Rogue Valley and surrounding mountains are extremely valuable to us all because they are integral to our community. The forests and rivers managed by the BLM are essential to the clean drinking water, native salmon runs, and the expanding recreation economy of southern Oregon. We urge the management of BLM lands to support our community values and:

Uphold the Northwest Forest Plan: The Northwest Forest Plan is designed to use an ecosystem management approach to forest management to protect rivers, old-growth forests and populations of native plants and animals. It has only been about 20 years since the NWFP was implemented, about the time horizon when beneficial ecosystem effects might have been expected to begin showing up. Why throw the baby (and the science) out with the bathwater? And rather than assume newer findings about barred owl competition with spotted owls being the sole cause of spotted owl decline, why not question why there is this increasing encroachment of barred owls in the first place? Could it have to do with decreasing habitat for both is favoring the more aggressive barred owl? It seems it would be a more scientific approach to conserve the habitat for both in order to further determine relationships, rather than plowing ahead and increase harvest, further decreasing habitat which can only increase the competition between species and further accelerate the spotted owl decline.

Uphold the Aquatic Conservation Strategy: A key principle of the Northwest Forest Plan is the Aquatic Conservation Strategy (ACS) which includes designated buffer zones around streams where logging is not allowed and dozens of other important provisions to protect streamside forests, clean water, and fish. With increasing intensity of logging that is occurring on private lands that are interspersed with

BLM lands in Oregon, and the rapid increase in adverse effects of erosion, sedimentation, habitat loss/fragmentation, now is NOT the time for BLM to increase its intensity of timber harvest and decrease riparian protections by decreasing the width of riparian zones.

Protect Ancient Forests: It is critical to a livable climate to manage forests to increase diversity, preserving mature trees over one hundred years old. Protecting biodiversity is essential for healthy forests, and we cannot assume that private industry will plan for diversity and old forests. Again, with increasing intensity of logging that is occurring on private lands that are interspersed with BLM lands in Oregon, and the rapid increase in adverse effects of erosion, sedimentation, habitat loss/fragmentation, now is NOT the time for BLM to increase its intensity of timber harvest and decrease protections in forests of large, mature trees.

In particular, the remaining fragments of mature forests and wildlife corridors that occur in the lower elevations of the Applegate Valley provide rare habitat that is important for species that have been driven to smaller and smaller areas of appropriate habitat. We know for certain that these refugia are home to many bears, cougars, elk, deer, owls of many species, birds and many many other creatures, based on our own “wildlife cams” that we have placed about on our own lands bordering these BLM old growth areas. Please do not decrease their viability for these animals by putting in more roads and removing mature forest ecosystems. In particular, we are referring to the area of the Slagle Creek watershed, the north-facing forested slopes, and the “bowl” headwater area in which we live. The remnants of old growth and mature forest here are healthy ecosystems supporting a great diversity of large and small wildlife species. To further fragment this remaining wildlife habitat by roads and logging, especially clear cutting, would be a travesty and a violation of the public trust. Please keep these forests in the Slagle Creek watershed intact, they are crucial for low elevation wildlife population sustainability and migration in this area.

Carbon sequestration is an increasingly important component of combating climate change. Mature forests are prime areas for carbon sequestration. Opening them up to more roads and reduced canopy closure increases the rate of carbon contributions to the atmosphere and further exacerbates climate change.

Protect Clean Water: Preserving the clean water supply that supports family farms, small businesses, individual wells, and community water supplies. Do not decrease riparian zone widths.

Protect Lands With Wilderness Characteristics: The new plan must safeguard “lands with wilderness characteristics” and roadless areas such as the Wellington Wildlands and the Dakubetede areas. Many of us moved to this area for its wilderness characteristics, which continue to attract people to this area to live and to recreate—providing a growing source of revenue for the local economy. Other commenters, including the Environmental Coalition and Siskiyou Upland Trails Association have cited studies and data, some of which are state studies and some are BLM’s own, that show that non-motorized recreation is one of the fastest growing sectors in public land users, and it brings in far more economic contributions to our local communities than do timber harvest and motorized recreation. It is also a longer-term sustainable contributor to local economies, versus the short-term interests of timber and county ‘welfare’ payments from timber harvest. It is a step in the right direction for all counties formerly dependant on the income from federal timber sales, in order for them to become more sustainable and less dependent on the payments from timber.

It is getting harder and harder to find areas where one can experience solitude and wilderness feelings on BLM lands in our area. We are fortunate here in the Medford district to have some rare remnants of lands with these characteristics within short distance of our communities. Please protect what we have left.

Reduce Fire Risk to Communities: A cost-effective way to reduce fire risk and fire fighting costs is through through fire prevention planning. Investing in thinning, stewardship contracting, and fuels reduction focused next to communities not only stimulates the local economy, but also will save money in fire-fighting costs over the long term. We have done much forest work on our own lands. Balancing forest management for fire resilience with the needs for carbon sequestration is a special challenge in mature forest ecosystems. Clear cuts and increased commercial harvest are not the answer in mature forests. They are too valuable for so many other purposes than timber commodity.

Use Existing Roads: Use only the existing road network to conduct any thinning or fuels reduction projects as prescribed by the forest or fire management plans. Building roads increases pollution and diminishes the open space needed by animals (and humans) and fragments crucial habitat. Blocks of open, contiguous space are consistent with BLM's forthcoming Resource Management Plans. The BLM has obvious problems maintaining and managing its existing road network, and adding new roads will only make this worse, leading to continued increase in erosion and sedimentation from the road network and the associated loss of water quality and habitat. Further, BLM has been ineffective at enforcing road closures and consequently, resource damage and public safety risks are occurring. Bottom line: NO NEW ROADS.

Use Best-Available Peer-Reviewed Science: Ensure all forest management recognizes the need for reduced timber harvest levels in the fragile, dry forest ecosystems of southwestern Oregon. Re-growth of southern Oregon forests is dramatically slower than those of more northern, wetter Oregon forests. This approach will preserve the sustainability of timber harvests for generations to come.

Preserve the Applegate Adaptive Management Area: Preserving the Applegate Adaptive Management Area (AMA) and all other special areas as a designated area in which the BLM must use a collaborative, community-based decision-making process that directly involves the community in forest management decisions. As citizens and neighbors we have the right to help guide actions that affect our lives and livelihoods.

Preserve All Areas Of Critical Environmental Concern (ACEC's): The O&C Act directs that BLM management of lands in Western Oregon mandates "protecting watersheds, regulating stream flows, contributing to the economic stability of local communities and industries, and providing recreational facilities." The retention of established and proposed ACECs, such as Hoxie Creek, Moon Prairie, contributes to all of the above objectives delineated by Congress.

We are concerned that several ACECs designated for their special values are proposed to have less protection or be dropped from ACEC status including; Hoxie Creek, Moon Prairie, Spencer Creek, and Upper Klamath. Page 129 of the DEIS indicates that under the agency's preferred action alternative the BLM intends to eliminate ACECs or reduce their size in order to "avoid preclusion of sustain-yield production in the harvest land base." The proposal relies on a misreading of the O&C Act and a misunderstanding of the timber capacity of the ACECs at issue.

Comments Specific to Recreation:

Trying to understand what is being proposed under the various mix and match alternatives in the RMP EIS is impossible. Without knowing what combination of actions might be selected in the end, it is difficult to support a given alternative over the others. However, we are concerned that the Draft RMP promotes plans that would resume clearcut logging, reduce streamside buffers, increase road construction, and reward damaging motorized off-road recreation on BLM forest lands.

It is pretty clear, however, that recreation is not given the weight it deserves in determining management direction, based on most recent studies which indicate that recreational uses are a much larger contributor to economic benefits derived from public lands than is timber harvest and the associated road building. Recreation should be a top priority in BLM's management of our public lands.

Non-motorized recreation has become a dominant player in the economic benefits provided by public lands, and is one of the most rapidly growing components of the recreation sector. We need a plan that protects, promotes, and creates more opportunities for non-motorized recreation. The more damaging effects of motorized recreation use should be confined to designated areas and designated roads and trails.

Specifically, we are concerned with recreation management areas in the Medford District that are popular with non-motorized users and contain remnants of low- and mid-elevation mature forests. These include the Enchanted Forest, Wellington Wildlands LWC, the Sterling Mine Ditch Trail system (a designated Oregon State Scenic Trail), Dakubetede LWC, the Jack-Ash and Applegate Ridge trails and their existing and future access trails, the Pacific Crest National Scenic Trail, Lake Semac area trails, the Grayback Trail, the Kerby Peak trail, and the Howard Prairie area. Protecting the forests and watersheds and habitat in these areas and keeping them separate from motorized uses and from target practice shooting will help preserve these areas, they are increasingly popular with non-motorized recreation users, and BLM should manage to promote user experience and safety. Recreation Management Areas should receive emphasis on maintaining visual quality to preserve the recreational user experience, thus logging activities should be limited in these areas. Further, target shooting should be banned in ERMAs and SRMAs and confined to specifically designated target shooting areas.

We have concerns about the very NAME of the Enchanted Timber ERMA, since it links, in the mind of the reader, the Enchanted Forest area (non motorized!) with the Timber Mountain area (motorized). This seems to be suggesting that these areas are both open to motorized uses, and they are not and should not be. The Enchanted Forest area/trail and Felton trail are popular with hikers and equestrians. These trails are easily damaged by wheeled vehicles. Over the years, I have noted that even one pass from an occasional motorcycle has done more to damage trail tread and channelize water than all the years of hiking and horseback riding has done. The Enchanted Forest area and Felton trail are and should remain closed to motorized uses, and should have protection from motorized use thru regular patrol and enforcement. The area should also be closed to target practice, as it is highly popular with hikers and equestrians, many of whom are families with small children, and who enjoy the special quiet beauty and solitude of this small remnant of low elevation old growth forest, not to mention the owls and wildlife who depend on the corridor for connecting to other habitat areas.

Even the Timber Mountain ERMA is inappropriate for motorized use due to steep slopes, resource sensitivity and close proximity to many residential areas. But in any case, there should be NO physical or visual or conceptual connection with the Enchanted Forest area, as this would encourage motorized users to stray into the Enchanted Forest Area. WHY is the Enchanted Timber area named thusly? The polygon as shown in the interactive map is not connected nor close to the Enchanted Forest and that should remain the case. We request that the BLM remove the word "Enchanted" from the name of this ERMA! This is ridiculous.

The Left Right Center Foots ERMA should be closed to OHV use, as it has caused resource damage and conflict with nearby residential areas. It should also be closed to target practice for obvious safety reasons, discussed further near the end of this letter.

In Chapter 3 and Table 3-127, the document discusses a BLM evaluation of activity specific recreation demand based on a web survey. The results displayed in the table give the impression that the demand for

mountain biking and OHC riding is much higher than for hiking or horseback riding. I suspect these numbers reflect a skewed response from user groups mobilizing fellows to participate. As equestrians, runners, and hikers we do not remember even hearing about this web survey, so I suspect many others in these under-represented activities did not either. A more scientific study might yield very different results. The figures in Table 3-126 would seem to support our contention that Table 3-127 under-represents the hiking and equestrian communities, although we do not find anything explaining where the numbers in Table 3-126 came from. Moreover, in Chapter 3, page 445, under Recreation Demand, the document states

“The BLM estimated recreation demand by considering the estimated number of visitors projected to participate in a particular recreation opportunity from 2014-2024 and beyond.”

Read this out loud: “The BLM estimated recreation demand by... estimating the number of visitors....” An estimate based on an estimate, and I have not found where it explains how these estimates and estimates of estimates were based. I doubt this type of “analysis” would pass scientific scrutiny. A recently released study by Oregon Parks and Recreation indicates a vastly different picture than the BLM’s figures in these tables portrays. That study indicates non-motorized user activity days per year outnumber motorized recreation activity days per year by about 62:1.

Target Shooting:

A HUGE problem we have observed on BLM lands in the Medford District that is adversely impacting public safety and the safety of nearby residents and communities is uncontrolled target practice shooting. The associated trash and public safety hazards that currently exist must be addressed. We have personally experienced the sound of bullets whizzing past us as we were hiking on trails in the Grub Gulch and Anderson Butte area. We have witnessed beer-drinking target shooters shooting targets they placed on the other side of the road. They were shooting ACROSS the road at their targets which, in this case, were pumpkins, but in other instances have been discarded television sets, computers, or furniture, with the obvious trash and health hazard debris left behind when they were done. Their beer cans are often placed on the hood of their car, within easy reach. They are usually wearing ear protection and do not hear us when we shout and whistle and holler to try to let them know we are approaching. This has happened to me on several occasions, one when I was horseback, one when I was on foot, and another time when I was in a vehicle.

Besides the obvious safety concerns, there is a huge problem with trash left at these landings and places of target shooting, not to mention the horrendous noise endured by nearby residents from the frequent gun shooting, and worse still, the upsetting noise and fire hazard from exploding targets.

The draft RMP does not go far enough to control target practice and the associated safety and trash concerns. Target practice must be confined to designated areas ONLY. These areas must be situated away from popular roads and trails, for public safety, they must be far enough away from populated areas so as not to create a ‘war zone’ atmosphere for residents, and target practice in all other areas must be banned. This ban must be enforced. Further, exploding targets should be banned from all BLM lands. They are unsafe, unnecessary, and present significant safety and fire hazards, as well as leaving shrapnel and sharp fragments all over the area from objects they are placed in or on.

We could spend another few weeks at least, reviewing the draft EIS, the maps, interactive maps, web documents and all the other information available for review and comment, and even with the extension of the comment period there is still not enough time for an average public to adequately review, digest,

and understand the options presented. How can we comment meaningfully on such a mass of confusing and conflicting information. We have done our best.

We request that any personally identifying information is not released to the public.

Sincerely,

Jim Clover and Annette Parsons



----- Forwarded message -----

From: **RMPs_WesternOregon, BLM_OR** <blm_or_rmps_westernoregon@blm.gov>
Date: Fri, Aug 21, 2015 at 10:53 AM
Subject: Fwd: Comments on Draft RMP
To: BLM_OR RMPWO_Comments <blm_or_rmpwo_comments@blm.gov>

Resource Management Plans for Western Oregon
Bureau of Land Management
web: www.blm.gov/or/plans/rmpswesternoregon

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Before including address, phone number, email-address, or any other personal identifying information in your comments, be advised that your entire comment, including personal identifying information, may be made publicly available at any time. If you wish us to withhold your personal information you must state this prominently at the beginning of your comment. While individuals may request that the BLM withhold personal identifying information from public view, the BLM cannot guarantee it will be able to do so.

You have received this email because you have previously submitted a request to be on the mailing list, stakeholder list, submitted a comment, feedback or survey response and/or indicated interest in the RMPs for Western Oregon.

----- Forwarded message -----

From: **Serena Rittenhouse-Barry** [REDACTED]
Date: Fri, Aug 21, 2015 at 10:49 AM
Subject: Comments on Draft RMP
To: blm_or_rmps_westernoregon@blm.gov

RMPs for Western Oregon

Bureau of Land Management

P.O. Box 2965

Portland, Oregon 97208

blm_or_rmeps_westernoregon@blm.gov

Re: BLM Draft Resource Management Plan/Environmental Impact Statement for Western Oregon

BLM alternatives in the DEIS would not provide a sustained yield of timber; would fail to adequately address climate change and species extinctions; would increase fire hazards instead of restoring fire adapted ecosystems; would degrade water and natural community ecosystems; would harm recreation, tourism and our local economy. They are not supported by best available science. They are not sustainable and would lead western Oregon counties and our rural communities into environmental, economic and social decline.

The Natural Selection Alternative (NSA), based on the best available science, offers a solution for long term economic stability and social health. The NSA would achieve BLM stated objectives while minimizing environmental impacts.

The community supported NSA resolves conflicts concerning resource uses on BLM lands including, the recovery of threatened and endangered species, providing clean water, restoring fire adapted ecosystems, producing a sustained yield of timber products, and providing for recreation opportunities.

The NSA will best address: the U.S. Fish and Wildlife Service's recovery plan and proposed critical habitat designations for the Northern Spotted Owl; new scientific information related to forest health and resiliency; carbon sequestration and climate change; and the socio-economic needs of western Oregon communities.

I request the BLM include the NSA for detailed analysis in the Final EIS for the RMPs for Western Oregon. The NSA meets all environmental protection legal requirements as it places ecosystem health first. This in turn lays the foundation for all forest products and uses at a sustainable level, providing community long term economic stability and social health.

Name: Serena Rittenhouse-Barry

[REDACTED]

[REDACTED]

[REDACTED]

August 18, 2015

RMPs for Western Oregon
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97208

Sean Burgett

[REDACTED]
[REDACTED]

In a number of sections, the Bureau of Land Management's Western Oregon Draft Resource Management Plan/Environmental Impact Statement states the probability is more than likely that the Spotted Owl will be extirpated from the Oregon Coast Range physiographic province within the next 34 years. This being said the BLM Salem District's lands in the Coast Range physiographic province would be of significant importance to the possible survival of the Spotted Owl within this administrative area, as the Western Oregon Draft RMP/EIS states, "a network of large blocks of forest to be managed for late-successional forests" and, further as, "maintaining older and more structurally complex multi-layered conifer forests"(pg. xxiii). These are two Spotted Owl recovery objectives based on sound science as found through the BLM's own research.

Moreover, the Western Oregon Draft RMP/EIS bases all management assumptions on computer modeling methods that may or may not produce scientifically sound data. Studies by Carrol and Johnson (2007) found the statistical models used by the United States Fish and Wildlife Service to draft the 2007 Spotted Owl recovery plan may have given misleading results in regards to owl distribution and thus population models would be erroneously misleading also. This is the same statistical model the BLM used in the Western Oregon Draft RMP/EIS. Further, Carrol and Johnson (2007) state the following: "the relationship between habitat and owl persistence at broader spatial scales remains a subject debate, due in part to uncertainty regarding the effects of latitudinal variation in prey community composition." How can a recovery plan be based on science that is largely uncertain and be in compliance with ESA Section 2 (16 U.S.C. § 1531)?

The BLM Salem District's lands represent a major portion of acreage that is not being managed as industrial timber resource lands, i.e., Hancock Timber Resource Group or Plum Creek Timber Company. That being said more clear-cuts are not what the Coast Range physiographic province needs.

Sincerely,

Sean Burgett

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From: **Romain Cooper** [REDACTED]
Date: Fri, Aug 14, 2015 at 9:39 PM
Subject: comments on the BLM western OR RMP DEIS
To: blm_or_rmpwo_comments@blm.gov

Hello BLM,

Please find attached 2 word documents that constitute my comments regarding the BLM Western Oregon Resource Management Plan DEIS. Please let me know that you have received my comments and feel free to ask any questions or address any concerns.

Thank you, Romain Cooper.

Romain Cooper
[REDACTED]

This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>

From: Romain Cooper



To: BLM Oregon
Attn: RMPs for Western OR Planning Team
<blm_or_rmpwo_comments@blm.gov>

Re: comments re: RMP for Western OR RMP DEIS; BLM (hereafter: WORRMP-DEIS)

8/14/2015

Dear BLM,

Please consider the following comments:

- The Illinois Valley (IV) has an incredibly diverse and interesting botanical resource. Ultramafic communities, oak woodland communities and closed canopy mixed evergreen forests (both xeric and mesic) are co-mingled in small patches to create an outstanding botanical landscape. The IV has high plant species diversity and a concentration of endemic and "listed" species. Much of the Illinois River "interior valley" (and adjacent near-valley slopes) is in private ownership. However, BLM ownership (both O&C and PD) is co-mingled with the private ownership. In recognition of the IV's exceptional botanical values, the Medford District RMP (1984) allocated much of the IV's BLM lands to the Illinois Valley Special Use Botanical Area. The 1984 IV Botanical Area had very weak management directive. Please include in the current RMP an IV Botanical Area with provisions similar to the 1984 Cascade/Siskiyou Ecological Emphasis Area provisions (please refer to Oct., 1994 Final RMP/EIS - Chapter 2-35). Such provisions would protect the outstanding botany and preserve the unique interplay of the various plant communities and allow natural process to operate.

Why isn't an IV Botanical Special Use Area included in the DEIS? In introduced legislation, Senator Ron Wyden included an "Illinois Valley Salmon and Botanical Area". BLM should include a similar designation in the administrative EIS process (as I requested during scoping). This IV Botanical Area should have strong protections against ORV use, a recommendation for mineral withdrawal and restoration logging only.

- Specific to the Illinois Basin, all ACECs and RNAs should be considered for mineral withdrawal. The "relevant and important values" of all existing and "potential" (nominated) ACECs and RNAs can NOT be protected from mining activities.
- Specific to the Illinois Basin, all ACECs and RNAs should be "closed to off-highway vehicle use" (as is French Flat). Significant resource degradation of the botanical resource (a "Relevant and Important Value" of most Illinois Basin ACECs) is occurring on a regular basis. In addition, this "outlaw" use of ORVs is creating a fire hazard during fire season and impacting the recreational experience for many public land users. It would be defensible for BLM to allow ORVs in ACECs on specific designated roads and trails perhaps. But the "wide-open" language "limited to existing roads and trails" allows ORV users to create their own trails over native ground then use them. There are so many "existing" roads (old skid roads, mining roads, etc.) and trails (user created) that this language may do very little to protect a world class botanical resource.

- The Waldo-Takilma ACEC (WT ACEC) is a "potential" ACEC that is recommended for ACEC status in all alternatives. I support this. I see (2) glaring problems with the way BLM proposes this ACEC in the DEIS.
 - ORV use: The "Limited to existing roads and trails" specification will not adequately protect listed plant species, unique plant communities and the "relevant and important values". The specification should be a recommendation of "Closed to off-highway vehicle use".
 - Spatial problems - I'm not sure what's happening on this concern? I had requested from BLM and received (& have in my possession) maps showing the BLM lands contained in the Potential Waldo-Takilma ACEC. To my knowledge, the maps in the DEIS don't show the boundaries. I did find an interactive map on line http://webmaps.blm.gov/GeoCortex/Html5Viewer/Index.html?viewer=rmpwo_interactive_map and found a mapped version of the Waldo-Takilma. To my surprise, I noted that the land base of the ACEC is different and lesser than shown on the previously supplied BLM Waldo-Takilma maps. BLM parcels in T40S-R8W section 35 and T41S-R8W sections 3 and 10 are OMITTED from the ACEC in this map. Is this a mistake or has something else happened? Please note, these lands are PUBLIC DOMAIN and not subject to the O&C Act. Please advise what is going on?
- Though the above comments relate mainly to botanical resources, Wildlife and Fish resources are often of great importance and these values can be furthered through an ACEC / RNA system and, in the IV, an ACEC/ RNA system that is "backed up" by an IV Special Interest Botanical Area".
- The Illinois River contains regionally important salmon stocks. The valley is a stronghold for the ESA listed Transboundary Coho stock. Additionally, the Illinois River Fall Chinook stock is important but precarious. The best spawning and rearing habitats for these two stocks are in the "alluviated" Illinois Valley. Coho utilize the smaller, low-gradient streams while the Chinook more often utilize the mainstem and larger forks and tribs. Much of these river and stream reaches are on private ownership where habitat impacts are to be expected. This is why it is important for BLM to identify and protect the salmon habitat. ACEC and RNA allocations can help and the Aquatic Conservation Strategy also is an important part of BLM salmon conservation. Please do not reduce buffer widths and other protective strategies of the Northwest Forest Plan's Aquatic Conservation Strategy. Fish and wildlife populations will suffer if you do.

Thank you for the opportunity to comment.

Romain Cooper

From: Romain Cooper



To: BLM Oregon
Attn: RMPs for Western OR Planning Team
<blm_or_rmeps_westernoregon@blm.gov>

Re: comments re: RMP for Western OR Planning Criteria; BLM (hereafter: WORRMP-PC)

Please consider the following requests as you develop a DEIS for the Western OR RMPs:

1. Please analyze and develop an alternative that examines all the ACECs (existing, potential and proposed) in the Illinois Valley and include protections that recommend mineral withdrawal, off road ORV use prohibited and no programmed timber harvest (only restoration timber prescriptions).

I read on pg. 8 (The O&C Act & FLPMA; WORRMP-PC) that ACECs will be subject to the O&C Act. I would like to suggest, in the analysis and formulation of alternatives, a more liberal interpretation of the O&C Act. The document states:

"Based on the language of the O&C Act, the O&C Act's legislative history, and case law, it is clear that sustained-yield timber production is the primary or dominant use of the O&C lands in western Oregon. In managing the O&C lands for that primary or dominant use, the BLM must exercise its discretion to determine how to manage the forest to provide for sustained-yield timber production, including harvest methods, rotation length, silvicultural regimes under which these forests would be managed, or minimum level of harvest. In addition, the BLM must conduct this management "for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities." Finally, when implementing the O&C Act, BLM must do so in full compliance with a number of subsequent laws that direct how the BLM accomplishes the statutory direction."

I may be mistaken, but it appears that the document (WORRMP-PC) then gives direction that indicates that every single acre of O&C land that is suitable for commercial production of timber must be "on the timber base" and "contribute to the sustained yield". If BLM is making this argument, my opinion is that this is a "reach". It is my opinion that the BLM should analyze issues and formulate alternatives without requiring that every acre of BLM land contribute to an "ASQ" or that every acre be subjected to commercial timber harvest. Past interpretation of the O&C Act has allowed BLM to take this route re: ACECs and I don't know any case law that forbids some O&C acreage to be "out of the timber base".

2. When analyzing the potential Waldo-Takilma ACEC, please keep in mind that this area is composed of PD lands only and that there are multiple confirmed fisher, red tree vole and northern spotted owl detections in this area. Please examine the "Remarkable and Important Values" of this area. It is my contention that the "Remarkable and Important Values" for the Waldo-Takilma ACEC include botanical and ecological values. These "R&I" Values are not just for rare and listed plants on the ultramafic soils but are for a scientifically and "remarkable and important" interplay between the land patches of ultramafic soils (and their plants and plant communities) and the land patches of "closed canopy" forests (including late successional forests). This very diverse landscape (along with the discreet parts of it) deserves recognition and conservation due to its "remarkable and important value".

3. Please analyze and develop at least one alternative that contains an "Illinois Valley Salmon and Botanical Special Interest Area". As the title indicates, such an area would 1) recognize the very special and unique botanical resource of the Illinois Valley and its BLM lands and 2) recognize the significant fisheries contribution (particularly for chinook and ESA listed coho salmon) of the Illinois Valley.

In recognition of the IV's exceptional botanical values, the Medford District RMP (1984) allocated much of the IV's BLM lands to the Illinois Valley Special Use Botanical Area. The 1984 IV Botanical Area had very weak management directive. Please include in the current RMP an IV Botanical Area with provisions similar to the 1984 Cascade/Siskiyou Ecological Emphasis Area provisions (please refer to Oct., 1994 Final RMP/EIS - Chapter 2-35). Such provisions would protect the outstanding botany and preserve the unique interplay of the various plant communities and allow natural process to operate.

- a. Botanical Wonderland - The valley, particularly on its ultramafic soils and on oak-pine woodlands and chaparral dominated landscapes, is know for spectacular wildflower displays, endemic plant species, listed plant species (including ESA listed species), and varied and unusual plant communities. The biological diversity of the general landscape is very high. The interplay of varied plant communities is of great biological and scientific interest. The small patch size of distinct vegetation types (due to fire history, aspect, and, especially, geologic diversity) contributes to the biological and scientific values. This includes the interplay of "open" ultramafic landscapes and patches of "closed-canopy forest" (As mentioned in point 2).
- b. Wild Salmonid Stronghold - The Illinois Basin is a stronghold for ESA listed "transboundary" population coho salmon and is also an important basin for "lower Rogue-Illinois River" stock of fall chinook salmon.

The best spawning and rearing habitats for these two stocks are in the "alluviated" Illinois Valley. Coho utilize the smaller, low-gradient streams while the Chinook more often utilize the mainstem and larger forks and tribs. Much of these river and stream reaches are on private ownership where habitat impacts are to be expected. This is why it is important for BLM to identify and protect the salmon habitat on public lands. ACEC and RNA allocations can help and the Aquatic Conservation Strategy also is an important part of BLM salmon conservation. But BLM should consider an additional allocation that will protect fisheries spawning and rearing habitat.

4. Socio-economics - Economy and Quality of Life - When analyzing the economic impacts of alternatives, please try to quantify and give fair value to the economy that depends on the natural environment of the Illinois Valley and remember that the BLM parcels on and adjacent to the valley floor are a very important and a critical contributor to what many of us consider a very high quality of life.

The economy of the Illinois Valley depends on small, "footloose business"; retiree population, and public sector employment. The individuals and businesses that comprise this economy are often able to locate in many places. The Illinois Valley is a home for many because of qualities that include scenery, "piece and quiet", recreational opportunities (trails for hiking, dog walking, etc.), wildflower & wildlife viewing, and open space. The economic benefits associated with the amenity values are not necessarily compatible with industrial style logging in the suburban interface. While logging jobs are relatively easy to calculate, the amenity related jobs are more difficult. Yet they may account for appreciably more employment and economic stimulus.

5. Off Road Vehicle Recreation - Please analyze and incorporate into alternatives ORV regulations that ban ORVs from going "off road" & "off trail". Please analyze monetarily and in environmental impacts, the cost of ORV use in alternatives and the savings when the machines are kept from driving "off road". The world class botanical values on BLM lands are at risk from off-road abuse.

I do not believe there is an imperative or obligation for BLM to provide off road users a land base to tear up the ground. I do not believe that the problems associated with off road vehicle use will be lessened by BLM allocating (at great expense) an Off - road sacrifice area. It's more likely such an area will spawn more trespass and more habitat degradation. As a valley resident for the last 43 1/2 years, I know that the current ORV phenomena is a relatively new (but growing) one that is NOT a part of the "traditional culture" of this valley.

Please designate the Illinois Valley BLM lands as "Closed to Motorized Use". I assume this is only "closed" for off-road use and road systems will still be accessible to public vehicle use (unless physically closed with a barrier or gated).

6. Please analyze the Port Orford Cedar Root Disease issue - Data should be current with maps of the infected and infection-free POC stands. Infection is a dynamic condition and PO Cedar is an essential ingredient to our aquatic habitats especially.

I am including below the scoping comments I submitted on 7/2/2012 so that the issues can be incorporated into this phase of planning when appropriate.

Thank you for the opportunity to comment.

Romain Cooper

Scoping from Romain Cooper on the Western OR RMP - July 2, 2012:

7/2/2012

To: Bureau of Land Management <BLM_OR_RMPs_WesternOregon@blm.gov>

Re: Scoping for Western Oregon Resource Management Plans

Dear BLM,

Please consider the following scoping comments:

- The Illinois Valley (IV) has an incredibly diverse and interesting botanical resource. Ultramafic communities, oak woodland communities and closed canopy mixed evergreen forests (both xeric and mesic) are co-mingled in small patches to create an outstanding botanical landscape. The IV has high plant species diversity and a concentration of endemic and "listed" species. Much of the Illinois River "interior valley" (and adjacent near-valley slopes) is in private ownership. However, BLM ownership (both O&C and PD) is co-mingled with the private ownership. In recognition of the IV's exceptional botanical values, the Medford District RMP (1984) allocated much of the IV's BLM lands to the Illinois Valley Special Use Botanical Area. The 1984 IV Botanical Area had very weak management directive. Please include in the current RMP an IV Botanical Area with provisions similar to the 1984 Cascade/Siskiyou Ecological Emphasis Area provisions (please refer to Oct., 1994 Final RMP/EIS - Chapter 2-35). Such provisions would protect the outstanding botany and preserve the unique interplay of the various plant communities and allow natural process to operate.

- BLM utilizes ACECs and RNAs as land allocations to protect BLM situated landscapes and ecosystems that have remarkable ("relevant & important") values. In the WOPR ROD, several "potential" ACECs and RNAs, were officially allocated.
 - This new analysis should include & analyze all of the potential ACECs & RNAs that were contained in the WOPR. All the nominations are "on file" with the BLM.
 - This new analysis should consider additional protections (from those suggested in and/ or afforded by the WOPR). This is for the potential and existing ACECs/ RNAs. Especially important in Southwest OR are provisions that recommend withdrawal from mineral entry. (Due to the language in the 1892 Mining Act, it is virtually impossible to protect natural values from mining.)
 - This new analysis should consider additional areas for ACEC and/ or RNA allocation. Citizen nominations should be included but also nominations should come from within BLM.
- Specific to the Illinois Basin, all ACECs and RNAs should be considered for mineral withdrawal. The relevant and important values of all existing and "potential" (nominated) ACECs and RNAs can NOT be protected from mining activities.
- The Waldo-Takilma ACEC (WT ACEC) was "finalized" in the WOPR ROD. However, since the decision is now "pulled", the WT ACEC is (I presume) now back in "potential" category. Please include analysis of this remarkable landscape in the new analysis. BLM has the nomination and its own WOPR internal documents on file. If more information is needed or desired, please contact me.
- Though the above scoping issues relate mainly to botanical resources, Wildlife and Fish resources are often of great importance and these values can be furthered through an ACEC / RNA system and, in the IV, an ACEC/ RNA system that is "backed up" by an IV Special Interest Botanical Area".
- The Illinois River contains regionally important salmon stocks. The valley is a stronghold for the ESA listed Transboundary Coho stock. Additionally, the Illinois River Fall Chinook stock is important but precarious. The best spawning and rearing habitats for these two stocks are in the "alluviated" Illinois Valley. Coho utilize the smaller, low-gradient streams while the Chinook more often utilize the mainstem and larger forks and tribs. Much of these river and stream reaches are on private ownership where habitat impacts are to be expected. This is why it is important for BLM to identify and protect the salmon habitat. ACEC and RNA allocations can help and the Aquatic Conservation Strategy also is an important part of BLM salmon conservation. But BLM should consider an additional allocation that will protect fisheries spawning and rearing habitat.
- Regarding the larger Western Oregon area, the Aquatic Conservation strategy should be "codified" in the new plan. Additionally, BLM should identify and protect fish habitat and, especially, anadromous fish habitat. A "new" allocation to protect aquatic resources should be considered.

Please keep me informed throughout this planning exercise.

Thank you very much for considering my input.

Romain Cooper - [REDACTED]

----- Forwarded message -----

From: RW [REDACTED]

Date: Wed, Aug 19, 2015 at 1:11 PM

Subject: Wildcat Creek Trails

To: BLM_OR_RMPs_WesternOregon@blm.gov, blm_or_rmpwo_comments@blm.gov

Dear Oregon BLM,

The Wildcat Creek Trail system is a true gem in the mountain bike community. This trail system allows off road cyclists the opportunity to challenge themselves in ways that are unavailable anywhere else in Oregon. These trails are truly unique in both the outstanding quality of the trail tread, the usage of natural terrain, and the wide level of difficulty offered. Just like skiers and snowboarders, mountain bikers with expert-level skills greatly enjoy the challenge of advanced “black diamond” terrain, and the Wildcat Creek trails challenge even the most skilled riders.

The Wildcat Creek trail system is one of the best kept secrets in mountain biking, but the word is out, and people come from far and wide to enjoy this unique experience. The unique challenges of the Wildcat Creek trails is exactly what attracts adventure tourism. Expert level riders from all over the world have enjoyed the Wildcat Creek trails, including riders from Australia, Europe, Canada and all over the United States. This trail system is a critical asset to Oregon’s recreational community, and must be preserved so that mountain bikers from all over can enjoy the trails and spend money in our region.

Downhill mountain biking has been a rapidly growing user group over the past 20 years and is currently growing more quickly than ever before. The preservation of the Wildcat Creek Trails would be a significant and progressive step forward to addressing this increasing need. This is a huge opportunity for the BLM to address this need.

The Wildcat Creek Trails are unique because they are extremely well made and very challenging. They are also unique because they are built by a trail building expert who is a mountain biker, and they are built solely for the purpose of downhill mountain biking. They aren’t built with a bulldozer, they aren’t over engineered, they aren’t built for equestrians, and they are not built for uphill travel. There are no other trail systems like these in Oregon, and only a handful in the entire western USA.

Please designate the Wildcat Creek trail system as a recreational area and preserve the trails. Keep it open for the usage of downhill mountain biking. If the trails are “sterilized” and made easy for beginner mountain bikers, then they will lose their unique quality and they will feel like any other trail system.

Wildcat Creek Trails are a gem in Oregon’s adventure tourism crown, and a unique treasure to the downhill mountain biking community. Please keep the trails open.

Sincerely,

Richard Whitekettle



August 18th, 2015

P.O. Box 2965
Portland, OR 97204

Dear Bureau of Land Management,

I would like to provide my comments to your proposed Draft RMP/EIS for western Oregon. I live in [REDACTED] and recreate on BLM lands and care deeply about their health and values associated with them. While I tried to find a provided alternative that both considered a sustained yield of timber and did not denigrate all other values besides fiber, I was unable. All alternatives increase logging while decreasing habitat protections promised by the Northwest Forest Plan (NWFP.) The BLM aggressively logged her holdings until 1994. We have had twenty years to start addressing all the harm. To toss such a valuable regional ecosystem approach to forest management is unwise. No alternative will help the recovery of threatened and endangered species such as the Norther Spotted Owl and the Marbled Murrelet. As you develop your final plan, please adopt these elements into the chosen alternative:

Road Impacts- With approximately 14,000 miles of roads on western Oregon BLM lands, no more should be constructed. Any alternative that greatly increases this unsustainable number should be rejected. Some alternatives would add up to 800 new miles! Some BLM watershed under the NFP are so heavily roaded that they do not comply with current Aquatic Conservation strategies. Any alternative should seek to thoughtfully reduce road system miles, and the fragmentation, sedimentation, and conduit for invasive species they cause in watersheds. Instead of increasing these harmful effects associated with road density, protect values like water quality, aquatic and terrestrial habitat, and reducing economic costs associated with an aging and expanding road infrastructure. Oregon BLM has a maintenance backlog of \$300 million dollars. The Federal Government will never fund this. When factoring in nearby Forest Service lands and adjacent private holdings, there should be no more increase of road densities.

Stream Buffers- It is unacceptable that stream buffers will be slashed in half in nearly all the alternatives proposed in the RMP. Stream-side buffers are essential to shade waterways and keep temperatures cool for salmonids and municipalities. Already across the West this summer, fish are dying because of high riparian temperatures due to global warming, low snowpack, and past land management. NOAA has reported that up to 80% of this years' returning sockeye population (Columbia River Basin) could die as a result of these above-average temperatures. In Oregon, lands adjacent to BLM lands have less protective stream set-backs under The

Oregon Forest Practices Act. It allows harvest on almost any steepness, and allows logging to within 20 feet of perennial streams, and no buffers on intermittent streams. With such terrible practices on adjoining lands, no reduced stream buffers should be allowed. Also, under the NFP much restorative logging was done in riparian areas on BLM lands. Your direction should be to continue to restore the lands you have degraded over the past decades. Riparian reserves are needed to facilitate spotted owl movement between reserves. BLM lands have a responsibility to owl connectivity, over the region, so these corridors should be increased not reduced. It feels like a slight to log riparian areas, then thin them for twenty years to speed their habitat potential, and then log them again without restoring such critical parts of the landscape. Ironically, stream buffers assist filtering polluted runoff from roads and logging areas. By keeping present BLM's current Aquatic Conservation Strategy (ACS) and Key Watershed standards, forest health will continue to improve and provide great *assets*.

Clearcutting- The science under the NWP regarding clearcutting was sound. They left 15% of the standing green trees behind to maintain structural diversity, contribute to downed wood and stream complexity, and provide carry over between rotations. These leave trees provide habitat, refuge, and ameliorate site conditions that plantations don't. We do not need more clearcuts. So much of BLM lands are plantations in need of continued thinning. The BLM plan allows clearcutting under most of the alternatives. It is not sound science, especially with spotted owl and marbled murrelets doing so badly on BLM lands. A return to "staggered setting" checkerboard pattern logging with clearcuts will increase "edge" habitat" which is already abundant on BLM lands and degrades habitat quality for species such as the spotted owl. Clearcutting also destroys the work done to provide corridors to help species safely move. With the landscape drying out, this harvest method is only a benefit to industry.

Old-growth- Older stand are in deficit on BLM lands. The BLM should protect all mature (80 years and older) and old-growth forests and fragments. With the RMP re-designating mature forests, it is unclear whether some previously protected forests will be offered for harvest. The Siuslaw National Forest and the Eugene BLM has done great work thinning forests under the NFP. Thinnings, restoration projects, and fuels reduction around homes and communities will raise revenue and contribute to forest health. Only twenty years into the NFP, one day there will be more older stands to harvest. It should not be done now when older forests are in deficit. Carbon storage is no longer a dismissible fancy, but an important component to our climate crisis. Increased clearcutting will not allow us to use this great resource to its fullest.

Recreation- I urge you to expand and protect recreational opportunity for people enjoying public lands. Recreation on BLM forests is a multi-billion dollar industry and growing while extractive industries are in a decline. Even if the most recreation-focused alternative (D) is chosen, it would only manage 3% of BLM lands "primarily" for recreation. Why does the BLM not really value growing recreational pursuits like hiking, boating, photography, wildlife-watching,

and many other forms of non-extractive outdoor activities? Management costs are a fraction to those associated with building and maintaining logging roads.

Survey & Manage- Maintain a program for protecting sensitive species which is similar to the Northwest Forest Plan, but based on current & reliable numerical population data, including the protective standards & guidelines of the Survey & Manage program. This program was designed for “species that seem to depend on old-growth forest conditions for some or all of their life needs.” Continue to survey prior to land disturbance to protect these rare plants and animals. The BLM’s Special Status Species policy was not working well, so Survey & Manage was needed. Your new proposal eliminates this category of species for conservation mandates. There is no analysis in the RMP of these particular omitted species. These species were categorized earlier as Bureau Sensitive Species, but the BLM states that it will only be providing conservation measures for these species in consideration of a tier below O&C Act purposes (fiber production.) “Proposed to be listed species deserve ESA protections, but the FWS is unable to address these protections given other higher priorities” and insufficient budget due to politics. These species should deserve special treatment under the plans, as they did under the NFP. The BLM proposes to disrupt planned new reserves that protect Survey & Manage species with commercial timber harvest. This will degrade habitat and reduce late-successional habitat these species need. Without maintaining the Survey and Manage program on reserve lands, the BLM cannot assume Survey & Manage species will thrive. “Merely conserving to the extent compatible with the O&C Act will lead to conflicts with the ESA,” and potential future listings of these species and lawsuits. It is irresponsible not to protect species like the red tree vole on BLM lands because these species are afforded more protection on Federal lands than on State Forest and private lands close by.

Post -Fire Logging-

Any harvest post forest fires should be prohibited, with the exception to protect public safety in the immediate vicinity of roads and recreation areas. With a resource area already suffering from too many roads, your agency should prioritize road decommissioning, and suspension of grazing after fires. The burned areas need to recover and maintain their hydrological properties post-fire forests. Fire salvage sales can always be rationalized by Federal managers. Please do not use salvage as a way to provide fiber to industry.

Marbled Murrelets-

Under the NFP, marbled murrelet occupied sites were given a half mile buffer. Two of the BLM Alternatives in the RMP propose to reduce this buffer to 300 feet. This will reduce size from 500 acres to 6.5 acres in size! The BLM provides no analysis or

scientific justification to support this reduction and assure that new buffers will ensure protection of the nest sites. This is an attack on this listed species, and will most likely result in a failure or predation of that nest site. There is much research to corroborate this statement. This BLM assumption that these nest sites will not be “taken” is incorrect, hostile, and is not based in science. This will result in further violations of the “ESA, the MAMU Recovery Plan, the 5 Year Review Recommendations, and the NWFP Recommendations.” It will continue litigation and public distrust of your management of our public lands. Also, do not reduce the distance from the coast where marbled murrelet are expected. The RMP notes that it will have protocols for these birds only to 35 miles from the sea. These birds can nest up to 55 miles from the sea.

Spotted Owls-

The RMP has done analysis for spotted owl habitat on a large macro level, and many smaller fragment of habitat may be lost to this big picture view. With the new definitions of what is considered high-quality habitat (tree height, dbh., canopy cover, etc.) I fear that that much potential habitat may be discounted. With the owl in such steep decline as highlighted on page 747-748, all high quality habitat is needed for owl recovery, and all sites need to be protected. All survey should not be discontinued. If under the NFP and all it's strategies for owl recoveries did not work, will shifting these various layers of protection to one land allocation based approach work? All quality habitat under the NFP and thinned LSR's and thinned riparian areas should be left alone to develop more decadent characteristics to benefit old growth dependent species.

Thank you for time and consideration of my comments. Please keep me informed and contact me with any questions.

Sincerely,

Peter Saraceno

----- Forwarded message -----

From: [REDACTED]
Date: Sun, Aug 16, 2015 at 11:32 PM
Subject: substantive comments on the draft RMP / EIS
To: blm_or_rmpwo_comments@blm.gov

Dear sir or madam,

Attached please find my substantive comments on the draft RMP / EIS.

Please do not publish my name with my comments.

Thank-you,

[REDACTED]

Mr. Jerome E. Perez
State Director
Washington/Oregon Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97208
blm_or_rmpwo_comments@blm.gov

RE: Resource Management Plans for Western Oregon Draft Environmental Impact Statement

Dear Director Perez:

I live in the [REDACTED] BLM District of southwest Oregon. The property that my wife and I own is bordered on three sides by BLM forest, so I am immediately impacted by BLM actions. We see [REDACTED]. I care about our forests and the land: we have a professionally prepared Forest Management Plan, and my wife and I have actively reduced fuels on our property, in part through several grants from ODF. I am also a member of the board of the [REDACTED]. I am actively involved with the [REDACTED], which has a goal of linking the trail systems of Jacksonville and Ashland by trails running along the ridgetops. I have advanced degrees in science [REDACTED] and I actively consult to the [REDACTED] industry in solving complex problems. For the past four years I have participated in the [REDACTED]. I am writing as a private citizen to express my concerns about the BLM's draft RMP.

First of all, the draft RMP / EIS has increased attention paid to recreation, relative to the WOPR. Paying more attention to recreation on BLM lands is most appropriate. Thanks.

Following are my substantive comments.

The BLM needs to actively address, monitor, and control target shooting on BLM lands. In the past 10 years target shooting has risen dramatically to high levels on BLM lands; for instance, target shooting occurs so often on [REDACTED] that **there are perhaps 5 days in a year when we do not hear target shooting.** Within a recent three-week span twice we heard shooting, including semi-automatic or automatic weapons, after 11 PM. (Note: this period occurred in July – August 2015, when we are very concerned about fires.)

The BLM should not wait to address target shooting until someone is maimed or killed by target shooting. A local example is the saga of Glen Bogart, who was shot by accident in 2006 on a Forest Service Road northeast of Ashland. Bogart had a fist-sized hole ripped through his back and then his arm when he stepped out of his vehicle for a bathroom break. A hunter had fired a shot from his 7 mm rifle and hit Bogart instead of a deer. The shot traveled 319 feet, across the Forest Service and through Bogart. Bogart struggled for his life. Eventually he had to give up

his job in an autobody shop.¹ This story illustrates the life-changing result from a misdirected bullet.

Below are some of the larger shells that I have collected from various sites on BLM roads on [REDACTED]. Shattered televisions, microwave ovens, beer cans, and dolls indicate that target shooting has occurred at these sites.

<u>shell found on Anderson Butte</u>	<u>distance a bullet can travel</u>
7 mm Remington Magnum	5 miles (TPWD) ²
.25-06 Remington (live)	
.30-30 Winchester	2.5 miles (TPWD)
.44 Remington Magnum	
.22-250 Remington	1 – 2.5 miles for .22 short - .22 magnum (TPWD)

At 500 yards a .22 bullet still has enough energy to put an eye out.³

Three (3) BLM employees have told me that they faced fire when driving on roads on Anderson Butte.

One of our neighbors whose property is surrounded by BLM land on [REDACTED] won't leave his house when he hears bullets, fired from above his home, pinging off nearby trees. In effect he is being held hostage by the shooters.

My wife has ridden her horse on BLM roads on [REDACTED], hoping to ride home in a loop. She has stopped when she heard weapons being fired, for fear of being fired upon: because many shooters wear ear protectors, we fear that shooters won't hear the shouts of people approaching them. Furthermore, the frequent presence of beer cans at shooting sites makes one suspicious that the judgments of shooters may be impeded. So my wife has turned back, and gone home the way she came. In effect she is being held hostage by the shooters.

My wife and I have called BLM law enforcement when we have heard shooting, especially semi-automatic and/or automatic shooting, on [REDACTED] after dusk. As we have grown to expect, the calls have been transferred to the [REDACTED] County Sherriff's department. The response from the Sherriff's department has been, "Have you seen shooting across roads?" We are not about to drive up to the BLM roads to determine whether shots are being fired across roads. I can't help but wonder if the Sherriff's department wanted to avoid facing fire themselves by not driving up to those roads – certainly that is how we feel.

¹ See *Mail Tribune*, October 14, 2006 and subsequent articles.

² TPWD = Texas Parks and Wildlife website:

<http://tpwd.texas.gov/education/hunter-education/online-course/firearms-and-ammunition-1/bullets>

³ http://www.answers.com/Q/How_far_can_a_.22_caliber_rifle_bullet_travel

██████████ seems to be a destination resort for shooters. Unfortunately it is in a heavily populated area, and many people are affected by target shooting. (And some of our neighbors have been so annoyed that they have shot back.)

Target shooting also occurs over the Sterling Mine Ditch Trail, which is primarily on BLM land. This trail was recently designated by the Oregon Department of Parks and Recreation as a Scenic Trail, the only Scenic Trail in southwest Oregon. People working on the trail have heard bullets whizzing overhead. Many people use this trail for recreation, which greatly outstrips logging as an income generator for Oregon. It would be irresponsible for the BLM to ignore the problem of target shooting on Anderson Butte and nearby areas and spoil the enjoyment of (and decrease the economic benefit from) people who drive out to enjoy the SMDT and this area in general.

Target shooting also puts at risk the resources that BLM is charged to protect. For instance, the ██████████ Fire on ██████████ Butte was caused either by target shooting or by an ATV driver.⁴

One approach is to halt unsafe target shooting during daylight hours. We have seen that target shooting on BLM lands occurs at trailheads, across roads, towards houses, and over trails. Some areas can be closed to target shooting, as the Spokane District closed Konnowac Pass.⁵ Some areas can be made physically inhospitable to target shooting. For example, on some roads on Anderson Butte there are sharp bends with extended corners; these corners are promontories or saddles that may have been used for staging logging operations. Now these areas have been used for parking, shooting at targets, and shooting into space. The BLM could mound up dirt and gravel in the extended corner of the bend so that there is room only for parking one row of cars, parked parallel to the road, hence discouraging target shooting. Another action is for the BLM to post SAFETY ZONE: NO SHOOTING signs on the roadsides. This would be appropriate since there are so many houses within close proximity to ██████████ Butte.

I urge the BLM to outlaw target shooting after daylight hours. It is inconceivable to me that people can be shooting safely after dusk. I realize that the BLM has limited law enforcement resources; however, unless there is a rule banning target shooting after dusk, the BLM LE has no means of halting such unsafe activity. I also realize that ██████████ County has no ordinance prohibiting noise; this fact is irrelevant since the BLM can set rules for behavior on federal land. The BLM can and should implement a rule banning target shooting after dusk.

The approaches above use the “stick,” not the “carrot.” The BLM could also designate areas for target shooting that would attract target shooters away from dangerous areas. These areas could be in little valleys, so that backstops could be put in place to catch stray bullets. These areas should not be close to homes. The BLM could provide targets for shooters.

It is obvious that target shooting is a major, continuing problem on ██████████ Butte, and on other areas within the wildland – urban interface. If the BLM does nothing they are allowing an attractive nuisance, to continue. I urge the BLM to address the problems of target shooting on ██████████ Butte in the RMP. What are the BLM’s plans to address shooting in the WUI?

⁴ *Mail Tribune*, Thursday August 2, 2012.

⁵ http://www.blm.gov/or/districts/spokane/files/FY13NR_0009_Konnowac_Pass_Closure.pdf

It is irresponsible for the BLM to clear-cut or allow clear-cutting on BLM land. In this regard I regard as “clear-cutting” the practice of cutting down all or the vast majority of trees on any portion of BLM land. Hence by “clear-cutting” I include various phraseologies, such as the “no-green tree retention zone,” “regeneration harvest,” and so on.

Reason: I do not believe that the BLM has sufficient resources to protect our land after clear-cutting. One reason to preclude clear-cutting is to protect our resources, federal and private, in the event of fire. Fires can destroy timber and habitat for animals, and extremely hot fires can break down the organic matter in soils, effectively sterilizing them. After clear-cutting and replanting trees grow up as a monoculture; the resulting even crown heights permit fires to jump throughout the canopy, spreading fire more readily. This was pointed out in the WOPR, and although BLM employees have told me that the science has changed regarding logging in riparian areas, I cannot believe that this assessment about the aftermath of clear-cutting has changed. I recognize that safer forests can be created through suitable treatment of the forest, such as thinning and limbing up and removing slash from such operations. Unfortunately I do not believe that the BLM has resources to responsibly handle post-logging activities such as thinning, limbing up, and removing slash.

I make that statement based on personal observations. On or about November 20, 2014 a crew contracted by the BLM conducted a pre-commercial thinning on BLM property off BLM road [REDACTED]. Our property abuts this BLM land. The trees, branches and shrubs cut by this treatment were left on the ground, creating a dense mass as much as 3 feet thick in some places. The ground was hardly visible as I clambered up the steep slope to BLM road [REDACTED] the following week. This operation created a massive fire risk for us. With the vegetative growth on the ground the risk of a fire spreading is severe. Professional foresters have looked at the current situation and estimated that it would take 10 – 20 years or even longer for the vegetation to rot on this north-facing slope, hence a high risk of fire may persist for many years. When my wife called the BLM person responsible for this operation, he told her that this pre-commercial thinning should have been done years ago – and obviously it hadn’t been done. He told her that he would have a meeting and get back to her. We have heard nothing, and nothing has been done to clear the downed vegetation or mitigate the risk of fire spreading from BLM land onto our property. Based on this irresponsible behavior I conclude that the BLM does not have the resources (time, money, interest) to responsibly care for forests after clear-cutting, which requires additional attention.

Even long-time logger and pro-timber activist Ed Kupillas believes that clear-cutting is wrong in southern Oregon:

“Clear cutting is actually a professionally accepted method of timber harvest in the right place. Here in southern Oregon other types of timber harvest are more appropriate most often.”⁶

I believe that none of the logging alternatives offered in the draft EIS will help the northern spotted owl population, and I expect that clear-cutting will send the NSO closer to extinction.

I wish to bring your attention to a 2015 publication on the NSO written by The National Council on Air and Stream Improvement.⁷

“Conservation planning for spotted owls (*Strix occidentalis*) hinges upon retaining late-successional and old-growth forests....We also found evidence for a positive influence of proximity to riparian zones on probability of use of harvested stands....our study suggests that judicious applications of partial-harvest forestry, primarily commercial thinning, have the potential to improve foraging habitats for spotted owls.”⁸

The abstract from this manuscript states that late-successional and old-growth forests are important to the NSO, but some partial thinning is okay. Riparian areas are also important to the NSO, and implicit is the statement that clear-cutting is not beneficial.

The big question: Why is the spotted owl declining? The answer offered at the June 17 BLM Forest Workshop meeting in Medford was that the barred owl was out-competing the NSO. From my study of ecology this answer seems too simplistic, as many factors usually interact to produce an outcome in complex biological systems. For instance, if the barred owl is the problem, then are there factors that drive the barred owl into the territory of the NSO? Does the NSO require more contiguous forested space? I have seen maps showing that the amounts of old-growth forests have declined in Oregon precipitously since the 1940s, and that there is scarcely any left. The USFS has opined that the BLM has allowed federal land to be overcut from the prescription that was sold; is it possible that excessive logging in the past two or three decades is responsible for the drop in the population of the NSO? In that case the BLM should consider cutting less timber.

Another question is why people want to scapegoat the NSO. The NSO is a bellwether for a diverse ecosystem found in old-growth forests, not a devil or something that should be easily discarded. Old-growth forests and riparian areas are homes for diverse species, species that may not be pretty, but provide different genes. Biodiversity is a bank of genes, which allows plants

⁶ Ed Kupillas, guest opinion, *Mail Tribune*, July 12, 2015.

⁷ The NCASI states on its website that “The National Council for Air and Stream Improvement is an independent, non-profit research institute that focuses on environmental topics of interest to the forest products industry. Membership is open to forest products companies in the U.S., Canada, and beyond.”

⁸ “Forest ecosystem restoration: Initial response of spotted owls to partial harvesting” Larry L. Irwin, Dennis F. Rock, Suzanne C. Rock, Craig Loehle, and Paul Van Deusen, *Forest Ecology and Management*; [Volume 354](#), 15 October 2015, Pages 232–242.

and animals to adapt. Adaptation in the face of climate change is going to be very important. We need to find conditions that foster the NSO, not persecute it, because conditions that foster the recovery of the NSO should also allow other endangered species to recover.

More attention needs to be paid to modeling for the effects of increasing temperature through climate change. Approximately 7 of the hottest years on record have occurred in the past 10 years. In July state fishing managers banned fishing in rivers and creeks throughout much of Oregon.⁹ What if the present drought is the new normal?¹⁰ In that case the BLM should be modelling for the ramifications of climate change on the environment, and locally higher temperatures.

For instance, higher temperatures and drought stress trees. Increased damage from insects is being noted, e.g. pine bark beetles. If the current conditions prevail, the trees that remain will grow more slowly. It is irresponsible to aggressively log large swaths of forest, because these trees might not grow back quickly enough under stressful conditions.

A great deal of research is underway on predicting the benefits of carbon sequestration. Living plants, including trees, capture CO₂; CO₂ released into the air raises the temperature of the thin skin of the Earth's environment in which we live, and acidifies lakes, rivers, and oceans. Felling trees and transporting them to a mill requires petroleum, hence producing CO₂ from the combustion of petroleum; obviously cut trees no longer acquire CO₂. The slash on the ground from downed trees can be metabolized to support other life, but all with the generation of CO₂. Young trees, e.g., trees in plantations, may indeed sequester more CO₂ than large trees on a per unit basis. Nonetheless, most of what I have read indicates that the greater benefit accrues from not cutting the trees in the first place.

At some time legislators may pass bills to compensate counties for carbon credit. In that case, the more large trees are left standing, the better.

Leaving trees growing is like having money in the bank.

The no-action alternative is not really “no action,” it is a change from what has been practiced. I note the words below, taken from the draft RMP / EIS:¹¹

It is not possible to analyze continuation of the current practices within the decision area as the No Action alternative for two reasons. First, implementation of the timber management program has departed substantially from the outcomes predicted in the 1995 RMPs, and the manner and intensity of this departure has varied substantially over time and among districts (USDI BLM 2012, pp. 6-12). There is no apparent basis on which the BLM might select and project into the future continuation of the practices from a specific year (or set of years) since 1995. Second, continuing to harvest timber at the declared annual productive capacity level for

⁹ Mark Freeman's article on the environment, *Mail Tribune*, July 17, 2015.

¹⁰ Opinion, *Mail Tribune*, August 8, 2015.

¹¹ Draft RMP / EIS, p. 77.

multiple decades into the future would not be possible using the current practices (USDI BLM 2012, pp. 6-12). The No Action alternative provides a benchmark to compare outputs and effects, even though this alternative does not meet the purpose and need of the project. Because of the inherent unsustainability of current practices, the BLM cannot project their implementation into the future; thus, continuation of the current practices would not serve the essential function of the No Action alternative of providing a baseline for comparison of outputs and effects.

This approach seems irresponsible. The BLM has removed the baseline, the status quo from carrying out the Northwest Forest Plan, from making any comparisons. I understood that the no-action alternative was a necessary part of the EIS. The text states that the outcomes, i.e., logging volumes, have deviated from the *estimates* of the NWFP. The text also states that the outcomes have varied substantially; I note that the volumes of timber harvested were quite consistent for 2010, 2011, and 2012, according to the **Northwest Forest Plan Interagency Monitoring, 20-Year Report: Socioeconomic Status and Trends**.¹² Furthermore, the sales were quite consistent at about 80% of the *probable* sales quantity. There must be some calculations to support the BLM's contentions. In addition, it seems to me that since the BLM was able to construct a model on the NSO based on four or five years of data, then the BLM should be able to construct a model of timber harvest volume based on 20 years of data (since the NFP).

So on p. 77 the no-action alternative was defined as something other than a no-action alternative. If these words are used once, so be it. If these words are used once and referenced everytime the "no action alternative" is mentioned, okay. If the current un-meaning of the no-action alternative is not mentioned regularly, it fits into the category of weasel words. Duplicitous, Orwellian language such as this is not transparent. When I read such language I immediately suspect that there may be many more places in these documents where the truth has not been laid out completely. The BLM destroyed most trust from the public when it acted against the stated will of about 95% of the public regarding the WOPR. Words like the above make me suspicious that my time, thoughts, and words will go unheeded.

In presenting models the BLM could do a better job of discussing assumptions that are the basis of the models. Having created spreadsheet models I am well aware of the importance of defining assumptions.

In my assessment of the WOPR I sifted through three to five layers of text to find that the economic analysis of the economic benefits from logging was based on the pond values for 2005, which was the peak of the market; hence the projected returns from logging were dramatically inflated relative to the recession being felt in 2007. The published BLM response to my concern was essentially a curt "Well, it was there" – which missed the point about how important it is to make the proper assumptions in order to generate a meaningful model.

At the June 17 BLM Forest Workshop meeting in Medford a BLM employee outlined his model predicting the survival of the NSO. He mentioned a "hexsim" model authoritatively; not being a

¹² Dated 5/13/2015. <http://www.reo.gov/monitoring/reports/20yr-report/20150511NWFP%20SocEcon%20Final2PageFinal.pdf>

statistician I had no idea of what such a model was, and why it was significant. I did not expect him to teach me the importance of his statistical model, but this was a gap in his presentation.

The above model on the NSO was based on four or five years of data. If the BLM was comfortable on creating a model on four or five years, seems to me that the BLM should be comfortable modeling a true no-action alternative for modeling.

Buffer regions for logging in riparian areas should be increased, not decreased. Leave snags for wildlife. Riparian areas provide moisture for plants, and water for animals, including game animals. Even streams that do not flow year-round can provide moister environments, and allow species to make it through the increasingly hot and dry summers. I recommend that the BLM treat all streams that do not flow year-round as streams where water flows continuously.

On a nearby slope on BLM land near us, logging occurred around a spring, a spring that supplied water to a home. This area was a seasonal stream, and logging was not supposed to occur over or through the area of the spring. Trees were felled and landed on the spring, greatly reducing the flow of water to the home. I recommend that logging be carried out no closer than one and one-half tree heights from the center of the stream.

Some BLM alternatives allow logging in the riparian areas in order to thin the trees. I can understand how such operations could be helpful in the long run, but I hear this as a way to capture trees that might have some retail value. And I expect that there could be a great deal of “collateral damage” in removing trees destined for thinning. I recommend that 1) the BLM establish a limit for how much of the canopy should be left after such thinning, perhaps 75% of the original canopy closure, and 2) the BLM mark trees to be removed, monitor the logging process, assess the job, and penalize contractors who deviate from the purchased plan.

Economic stimulation: Increased attention needs to be paid to foster recreation, not to increase logging. Recreation greatly outstrips logging as an income generator for Oregon

As I mentioned above, many people use the [REDACTED] trail for recreation. In 2012, 2013, 2014, and 2015 [REDACTED] and [REDACTED] sponsored the Run the [REDACTED], with about 80 – 150 runners participating. Some BLM employees from the Medford district have enjoyed this run. People from outside Oregon have enjoyed the trail; my wife and I have talked with people from Colorado who have come out to the [REDACTED], and they learned about the [REDACTED] by searching on the internet. One Sunday several years a work party associated with SUTA was pleasantly surprised to find the head of BLM recreation (from Washington DC) out exploring the SMDT.

I note the following from the O&C Act:¹³

¹³ <http://www.blm.gov/or/plans/wopr/files/OCAct.pdf>

“...the timber thereon shall be sold, cut, and removed in conformity with the principal of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities”

I interpret the above as stating that protecting watersheds & streams, contributing to economic stability and providing recreation are on equal footing to providing a permanent source of timber through sustainable yield. Unfettered logging will decrease the revenue to Oregon from recreation.

No one wants to recreate in a clearcut.

Economic stimulation: Increased attention needs to be paid to fuels reduction, not to increased logging. ODF has spent \$200,000,000 fighting fires statewide in the past two years.¹⁴ This expenditure could decrease dramatically if the BLM focused more on thinning and fuels reduction than on logging sales.

Recreation: All trails must meet NEPA regulations. All trails must meet NEPA regulations, or there will be continued resource damage. I completely support the recommendations of the Siskiyou Upland Trails Association regarding the design, use, and closure of trails.

BLM alternatives to cut more timber fly in the face of what I believe to be sound Management of the Land, which is the responsibility of the Bureau of Land Management. The BLM is reacting to the shouts and whines from Walden-DeFazio-Schraeder, and from actions proposed by Sen. Wyden. The Walden-DeFazio-Schraeder efforts pander to logging interests. Increased logging may bring about short-term profit, but at the expense of long-term gain.

[REDACTED]

[REDACTED]

Please do not publish my name with my comments.

¹⁴ Ryan Pfel, *Mail Tribune*, May 28, 2015.

From: "RMPWO_Comments, BLM_OR" <blm_or_rmpwo_comments@blm.gov>

To: RMP-Comments@heg-inc.com

CC:

Date: 8/17/2015 11:35:25 AM

Subject: Fwd: comments

Attachments: [BLM ltr- 7_14_15.docx](#)

----- Forwarded message -----

From: **Kristi Cowles** [REDACTED]

Date: Sat, Aug 15, 2015 at 5:09 PM

Subject: comments

To: blm_or_rmpwo_comments@blm.gov, Kristi Cowles [REDACTED]

A Message to the Bureau of Land Management

Do you expect us to be reasonable and polite about the fact that you are about to crucify our forests here in the Applegate-again? Do you expect us to not be angry, even enraged at what you are about to do? I am quite aware that the archaic, dominator system you live by still insists that women are never supposed to get angry. Well, this is 2015; so deal with it, and I hope more women are owning their power these days!

Needless to say, both women *and* men here in the Applegate Valley have got your number.

It's likely you don't realize or even care about the hundreds of hours dozens of Applegate citizens have "wasted" on trying to *reason* with the BLM? What this effort means to me, is that you are literally happy to be wearing us down, gobbling up our energy.

The issue of chopping down our forests should not even be an issue!

I am incensed at BLM government higher-ups, who make these decisions, who are ignorant about what really matters: preservation of our forests; our animals, our water, our air, which equals a healthy way of life!!! You sit there in your offices and scheme and dictate and throw carrots at us, thinking that those tidbits will quiet us. Well, we're onto you. We cannot be fooled. You will never quiet us or seduce us into believing your lies!!! Ever!

What would it take for the BLM to "wake up?" Perhaps some catastrophic event? Or maybe even a revolution?

I know you are going to chop down our trees, willy-nilly. **Using the euphemism, "harvest" in order to coax us into thinking that our trees are synonymous with a radish, doesn't work!** How would you like it if we "harvested" you? Most humans are much less important than all of Nature. With no conscience, whatsoever, massacre can happen, and it has, using your almighty chain saws. No matter what we do or say, you simply do not give a rat's ass about our ailing planet, not to mention, our precious trees!

You, who are "managing"—another euphemism, used to keep us quiet—our already fragile mountain forests will eventually pay with your physical and mental health, even with your families . . . I feel sorry for those of you, who are so numb and dumbed down, that valuing money and control over others, far surpasses compassion, cooperation and respect for all sentient beings. On that note, I leave you to your wasted lives.

Assertively,

Kristi Cowles, [REDACTED]
[REDACTED]
[REDACTED]

PS: We just drove Interstate 5, from the Applegate, to Hwy 42 and over to Bandon, OR. Then up to Charleston on Highway 101, and back to Bandon on the old road. Clear cutting on Interstate 5 is despicable, unconscionable, and shameful, and is also still happening near the coast. When will all this stop?!

----- Forwarded message -----

From: **Jon Adams** [REDACTED]
Date: Tue, Aug 11, 2015 at 6:46 AM
Subject: Blm RMP Update
To: blm_or_rmpwo_comments@blm.gov

Hello,

I have attached comments and an illustration regarding the upcoming Regional Management Plan Update Specifically the Anderson Butte area.

Thank you,

Jon Adams

Hello,

I would like to add a few comments related to the Western Oregon RMP, specifically the [REDACTED] area. We would like to remain anonymous to the public as our location leaves us vulnerable to repercussions from other interest groups. (A neighbor on [REDACTED] Rd. recently experienced retaliation related to illegal target shooting.)

We live at [REDACTED] just north of the [REDACTED] and west of [REDACTED]. We adjoin BLM land on 3 sides including road [REDACTED] to the west.

A daily concern living here relates to the unregulated target shooting in the area. Nearby .44 miles as the crow flies there is a flat ridge top pad approx [REDACTED]. We live directly below this clearing that is regularly used for target shooting. This ridge top pad sees around 20 groups per week and is one of the more popular spots for Medford area shooters. Some problems inherent with this location include: no backstops or barriers preventing errant bullets from leaving the site, a ridge top topography lending itself to increased projectile travel distances as they drop to the canyons below, there are two well used trailheads directly in the line of fire from the east and west, and the fact that the roadside cut bank commonly used as a backstop shooting across road [REDACTED] is illegal.

The attached Google maps illustration shows the proximity of homes, roads, and the proposed [REDACTED] which are within range of even small caliber ammunition (1 mile) from the two popular ridge top shooting areas. All other sections of the west side road [REDACTED] which includes several turnouts, subject residences, and forest visitors to these safety issues as well.

We hear the ricochets (lasting several seconds) heading down the canyon towards [REDACTED] knowing it will end up on a neighbor's property below. A rifle shot could easily reach [REDACTED] and beyond. Our family is within lethal* gunshot range of this location along with several other residences and forest visitors. All it would take is a slight deviation from the common line of fire and an unobstructed shot heads towards our homes. Knowing this we are constantly in a state of fear when people are shooting above us. It seems just a matter of time before an incident of life or property is involved.

The proposed [REDACTED] trail is also within range from not only this target shooting area, but another to the south. There are and will continue to be bullets raining down on [REDACTED] putting hikers and other trail users in jeopardy if shooting is allowed as it currently exists. I have witnessed people shooting south towards [REDACTED], a clear and unobstructed path down to the canyon below. The negative effects of the unregulated shooting in these areas will have hikers and others on edge as the feeling of danger from bullets coming from above is ever present. I doubt there would be many return visitors after being subjected to this type of situation.

With respect for safety of the neighborhood property owners, [REDACTED] Trail users, and all other forest visitors I would propose a posted “No Shooting zone next 5 miles” along BLM road [REDACTED] from [REDACTED] Road (lower pavement) intersection to [REDACTED] ([REDACTED]) as there are homes, property, and trail users well within gun range in all direction. Simply closing the two specific target shooting areas will only move the shooting to the next available turnout or trailhead which could actually make matters worse.

As a reference these are some of our experiences living here the past 2 ½ years:

Origination from [REDACTED] Ridge top shooting area.

- 3 different occasions where Bullets passing over the house within 100 ft or so once hitting a tree next to our home.
- Three emergency calls to 911 due to nighttime gun fire of fully automatic weapons including other unknown semi on single shot type weapons with bullets impacting the trees on or near the property.

Origination road [REDACTED] turnouts 500’ east

- An incident with Shotgun BB’s raining down on our home and vehicles.
- Several instances of rifle and or hand gun fire directed down/over our property from the turn outs above.
- Target shooting at our gate along with the [REDACTED], BLM road marker being shot, all directly towards our path of egress.

*These are only the incidents we know of- when we are a home.

I have nothing against gun owners exercising their rights. Being as I possess several firearms of my own, I have spent countless hours target shooting; however I have never seen this type of situation before. In the simplest of terms [REDACTED] is reminiscent of the Wild West (but a much larger population.) The shooters control the mountain limiting access for other recreational users for fear of stray bullets. On several occasions upon reaching a gated trail head I have ended up looking straight down a gun barrel. Once I ended up being stuck on a mountain which has three trail heads, each one being shot at. I had to wait it out until someone took a break then cautiously try to pass. By no fault of their own, while wearing ear protection shooters can not hear anyone approach. Be it ignorance or blind faith that no one is beyond their target this common practice of shooting at BLM gates (where many trails begin.) is just another unregulated illegal activity that happens up here everyday.

The fact of this matter is we are being shot at and if history is an indication this will continue unless BLM does something about this situation. There are many other safe recreational shooting areas available on [REDACTED] and designating these areas will free up the mountain to everyone else. At the very least a specific No Shooting closure on [REDACTED] and all trail heads would help balance the opportunities along with ensuring everyone's safety. I believe if this is not accomplished the viability of this area for any other type of recreation other than shooting is out of the question along with jeopardizing the safety of the local residences and other forest visitors.

Jon and Teri Adams
[REDACTED]

* Ammunition Range-Sporting arms and Ammunition manufacturers Institute
<http://homestudy.ihea.com/ammo/20cartridges.htm>

----- Forwarded message -----

From: **Janet Shellman Sherman** [REDACTED]
Date: Thu, Aug 13, 2015 at 10:52 AM
Subject: PLAN B --
To: "blm_or_rmpwo_comments@blm.gov" <blm_or_rmpwo_comments@blm.gov>

13 August 2015

[REDACTED], [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RMPs for Western Oregon
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97208

My view is NOT commonplace in [REDACTED] County. Moreover, comments that are pro-environmental are received with extreme intolerance by those not of similar mind on this issue. Anyone that seeks to protect our federal forests is stamped with the derogatory label: Environmentalist. Yet the aspersion is cast by a person that dislikes the government, but certainly doesn't mind having their hand out to take federally owned resources when provided. Thus, please protect me by not publishing my address. I request I make my comments anonymous outside the reviewers of the BLM.

Dear Sirs and Madams:

I support the Bureau of Land Management's decision to manage our Federal lands for their best use, using PLAN B. Our forests should be held undisturbed, as a resource that buffers us against the escalating effects of global warming, the continued loss of biodiversity in flora and fauna, and as a resource for future generations.

1. Our county has approximately 35 % to 40 % of its forests in private hands. I am assuming 95% of that land is tightly managed, with cuttings in 40 to 50 year cycles. Why is our current forest industry with carefully managed lands not able to keep a ready, willing County work force in employment? It is noteworthy, that whole trees are being shipped elsewhere, e.g., overseas for milling. Isn't it important to start in the private sector to make jobs available to those that seek forest work as their preferred vocation?

2. Perhaps as much as 10 % to 15% of federal lands are available for harvest, hopefully in much longer cycles of 80 to 100 years. Yet above 50% harvest of forests (Private + Federal), we would likely NOT be sustaining or replenishing healthy forest lands in this ecological environment of 2015 and beyond. Why?

Fires and extended cycles of drought are added variables when considering the total % that can be available for harvest. More fires are occurring each year in Oregon. In part, these fires are facilitated by higher temperatures and drought. There are numerous peer reviewed studies now that show global climate changes cause a prolongation of the cycle of severe drought (Craig et al 2010). Thus, drought cycle lengths and the probability of fire must be considered before harvest decisions are made. Loss of forest by natural and man-made causes is a growing negative on forest sustainability, as shown by disease of tree crowns, tree susceptibility to greater numbers of insect pests and to microbiotic-disease agents. We have forests that are undergoing severe heat stress that are only made worse when we remove more forests.

Consider too that unfragmented landscapes of forest cover are useful in their current maturing state:

1. We indeed lose plant and animal fauna to extinction when we clear cut habitat and create widened, fragmented corridors that impede safe organism dispersal. We are in our 6th and greatest mass extinction since Earth's formation, and it is due to overuse and abuse of natural resources.
2. Importantly, forests function as highly efficient Carbon Sinks and Water Sinks.

--Carbon emissions is sequestered from the air and used to enhance tree growth, secondary understory growth, epiphytes, and soil biodiversity, particularly microorganism growth. All of these plant growth components mitigate carbon emissions that are the NO.1 cause of global warming. Complexity of a forest also supports animal reproduction/survival of forest dwelling organisms. Putting forests to use by disuse is a win-win for mitigation of local warming and protection of our diverse animal life.

--Water is held most efficiently in mature forest landscapes. Humidity and temperature of 100-year-old forests can be directly measured and compared to 40 -50 year old forests and to clear cut landscapes. A moist mature forest environment with reduced shrubby understory will help to retard the spread of fire not increase it!

We need to be putting forests to use as carbon sinks and water sinks. It is predicted that our use of fossil fuels will increase given that we are in a world glut of oil and gas and it will become more cheaply available. This means a rise in global warming and carbon emissions is likely to occur.

I support Plan B and vote to minimize our further erosion of our federal forests. I also urge that Federal credits be given to landowners that own land that seek long term locks for forest preservation. We should be supporting the county by employing folks to augment our forest lands and to properly managing such forests to become better sinks for carbon, water, and animal life.

Please email me for notification of public hearings in our area.

Thank you for your service.

1. Allen, Craig D. et al, 2010. A global overview of drought and heat-induced tree mortality reveals emerging climate change risks for forests. *Forest Ecology & Management*. 259: 4, 660-684.

2. Ashton, Mark S., Tyrrell, Mary L., Spalding, Deborah, and Gentry, Bradford (editors), 2012. *Managing Forest Carbon in a Changing Climate*. Springer

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----- Forwarded message -----

From: [REDACTED]
Date: Fri, Aug 14, 2015 at 4:22 PM
Subject: Comments on the draft RMP for Western Oregon
To: blm_or_rmpwo_comments@blm.gov

Attached please find my comments on the draft RMP. Please do not release my personal contact information.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

Jerome E. Perez
State Director
Washington/Oregon
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97208

Comments on the Draft 2015 Resource Management Plan for Western Oregon

Dear Director Perez:

Although I appreciate the hard work the BLM staff has put into the draft resource management plan for Western Oregon, I must confess great disappointment in the draft set of alternatives for BLM's future management of the public's forests. As someone who reads and writes technical documents for a living, I know this was not an easy document to put together. However, a review of the EIS suggests that BLM already has a pre-determined outcome for much of the core components of a future RMP – to step away from the Northwest Forest Plan and all of the ecological-based management principles laid out in the Northwest Forest Plan and to increase timber harvest. As it states on the US DOI website:

“EISs must highlight reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the environment. They are used to inform decisions – not to justify already-made decisions.” <http://www.blm.gov/wo/st/en/info/nepa.html>

A document of this size presents an overwhelming set of details to comment upon. Other organizations are submitting detailed comments that cover many of the issues I am concerned with - such as the Environmental Coalition, the Siskiyou Upland Trails Association or the Applegate Trails Association. I support their views. I have limited my comments to some key over-arching points and also made comments specific to the future management approaches for the area in the Medford District where I live.

1. The final RMP EIS should present clearer alternatives and add the current Northwest Forest Plan AS IMPLEMENTED as an alternative: The draft EIS alternatives do not provide a clear set of easily differentiated alternatives for decision makers (or the public) to review. While I appreciate the idea of a mix and match approach, it results in a highly confusing document and makes comparisons of the different alternatives futile and much more time consuming. In addition, the BLM in my opinion has failed to include a key alternative – the current RMPs as implemented. We have 20 years of experience with the Northwest Forest Plan. To dismiss full consideration of the Northwest Forest Plan as implemented as an alternative simply because the timber production has not met the stated “goals” is a surprising decision and runs counter to the way the vast majority of environmental impact statements are designed. In most EIS documents the status quo – the base case – is what all action alternatives are evaluated against. The final EIS for BLM's RMP should include full consideration of the existing Northwest Forest Plan as implemented. Without such a comparison, the public cannot gain a perspective of what the environmental and economic impacts of the status quo are - projected into the future - versus various components of the other four alternatives.

2. The RMP fails to substantiate why many key management principles of the Northwest Forest Plan are being abandoned or altered: The Northwest Forest Plan was a science-based management plan that considered a fairly balanced range of ecological values when determining forest management practices. It also created coordination between the Forest Service and BLM so that the Pacific Northwest's forests were managed in a more coordinated fashion. The Northwest Forest plan may not be perfect, but to undo many of the ecological principles guiding forest management without any scientific justification (none are provided in the RMP document) is irresponsible. The EIS fails to present any new science that shows that BLM is justified in abandoning or changing the thoroughly researched and scientifically based measures in the NW Forest plan. The proposed shrinking of riparian protections is a perfect example. Even more puzzling is the fact that the BLM and Forest Service have released 20 year monitoring reports that suggest to abandon the NW Forest Plan at this point would eliminate the chance of achieving the many forest management principles established by the plan. As the scientists and policy makers who crafted the NW Forest Plan pointed out, it would take decades for the abuses of the past resource extraction practices to be reversed in our forests. We are just entering the period when positive results will be seen. The Interagency NW Forest Plan June 2015 20 year monitoring report is very telling about the direction that the RMP should go:

“Nothing in the findings indicate that attainment of desired outcomes over the next few decades is not feasible...”¹

The only logical explanation I can come up with for BLM's unexplained proposal to abandon much of the NW Forest plan efforts is the political pressure from some Oregon counties and a few Congressmen who have to listen to the Counties' whining. BLM has a responsibility to manage the public's forests on behalf of the entire public and the resources they contain. To abandon many of the key ecological protections achieved through the Northwest Forest Plan and focus solely on increasing timber production is not sound management. Timber production and protection of key environmental values can both be achieved and experience with the NW Forest Plan RMPS indicates this can happen – even if the level of timber harvests is not pouring money into a few Oregon counties that appear to feel they are entitled to being on the dole forever even when timber harvests will not come close – even at the highest levels proposed in the RMP – to producing the type of revenue that recreation is providing. Just because the county commissioners appear to be blind to economic or environmental facts, it does not mean BLM has to manage according to these short-term financial pressures. Oregon's economy has been steadily adjusting and diversifying. Timber jobs have been dropping for decades not because of a lack of logging on federal lands but due to mechanization. I recommend that BLM keep the levels of timber harvest needed to make our forests healthy and fire resilient while providing other big-ticket economic and environmental needs such as protecting drinking water, fisheries, providing wildlife habitat, and recreation opportunities. The levels of harvesting in most of the Alternatives would fail to do that while undoing many important protections provided by the Northwest Forest Plan.

3. Maintain Northwest Forest Plans Riparian Corridor protections: The DEIS completely fails to substantiate with any scientific data, modelling or clear analysis the basis for diminishing the

¹ Northwest Forest Plan—The First 20 Years (1994-2013): Status and Trends of Late-Successional and Old-Growth Forests , abstract <http://www.reo.gov/monitoring/reports/20yr-report/LSOG%2020yr%20Report%20-%20Draft%20for%20web.pdf>

protection of riparian areas. Despite decades of strong scientific research documenting the importance of protecting riparian areas with as large a buffer as is possible (as in the current NW Forest Plan and current RMPs in place) the BLM has decided to ignore all data - even that presented within the RMP! For example, in Volume I of the draft RMP it states: “Monitoring results conclude that the ecological condition of approximately two-thirds of the watersheds in the Northwest Forest Plan area have improved in condition in the past two decades.”²

We happen to own private timber land adjacent to BLM land and have learned about the impacts of logging close to riparian areas. When some of the BLM adjacent to us was last logged – prior to the NW Forest Plan’s implementation, the logging operations not only cut right up to the intermittent stream that flows down into our land, but the logging equipment went down a steep slope and across the intermittent stream - running right through a highly productive spring and seriously damaged the water flow of the spring. Not only did these springs happen to provide the drinking water for our property, they are key to providing water throughout the year for wildlife in the area. It has taken decades for trees to begin to regrow and provide shade along this section of the intermittent stream and the spring has never regained its former flow. While I doubt such actions would occur today, reducing protections of these important riparian areas would be a major management mistake. I strongly recommend that the final EIS eliminate all consideration of making riparian areas smaller. If anything we should widen them. The impact on water quality, fisheries, wildlife and more make it critical to maintain the existing riparian corridors width and any reserves around them. Unless BLM can definitely show new scientific evidence that smaller riparian buffers improve all of the ecological conditions currently protected, they risk undoing the gains achieved in the past twenty years. This impacts not just federal lands but also adjacent private lands.

4. Spotted Owl - if you don’t like the message - don’t shoot the messenger:

I have two points to raise related to the spotted owl. First, the RMP EIS has many curious leaps of logic on different topics. The analysis and conclusions BLM seems to have reached about the Spotted Owl is a prime example. Many key questions that might logically be asked about the findings of BLM research appear to have been either not asked or ignored. For example, at the BLM spring presentation on the draft RMP timber management proposals at the Medford District, recent findings about the spotted owl were presented. The basic takeaway from the presentation was that the competition from Barred owls was causing the Spotted Owl populations to decline and therefore managing timber harvests to avoid adversely impacting spotted owls was essentially pointless.

This view is summarized on pg. 784 of Vol II of the EIS where it states that due to barred owl encounters, the population of northern spotted owl would not respond substantively to different amounts and types of habitats provided under the different alternatives. The leap in logic to say barred owls are essentially single handedly responsible for the decline of the spotted owl is nothing short of amazing, jumping over many questions that clearly fall out from the struggle between these two species. For example, the question of why barred owls have moved into the region has not been addressed in the EIS. What might have changed in the ecosystem to make this influx of barred owls

² Draft RMP for Western Oregon , pg. 233 Volume I

possible? Has this influx of barred owls been seen before? Where and when? Are there areas where spotted owls and barred owls seem to be able co-exist and if so, what can be said about the habitat/conditions that might make that possible? Questions such as these would seem to be a direction that any thorough scientific investigation might take – to explore why this change in owls is occurring. If BLM had explored such questions more it might have added some substance to the RMP and perhaps changed the conclusions drawn about the spotted owl's future and the management of the BLM forests.

In my view, it seems as though the primary change in the Pacific Northwest Forests in the past 80-100 years has been our logging and habitat fragmentation from development – although compared to other parts of the US, this is not as big an issue in much of Oregon owing to the large expanses of federal land. The maps showing the extent of old complex forests in 1930s/40s versus 2012 in the recent BLM/Forest Service 20 year monitoring reports for the NW Forest Plan are very telling and suggest one possible interpretation to why the spotted owl may be on the decline – we have eliminated most of their habitat and cut off large sections of habitat from others.³

But while the conclusions reached in the draft RMP are more than suspect, the more important issue relates to the phrase “if you don't like the message don't shoot the messenger”. While I like spotted owls, their specific survival is not the real issue I am concerned with. Rather I view their demise as an indicator species of the health of our forests. Unfortunately the list of species threatened in our northwest forests is growing not decreasing. An ecosystem is a complex web of interactions of all species. For humans to think we can go on disturbing the environment forever without consequences is fool hardy and we know that. Yet here we are facing another forest management plan that suggests reinstating clearcutting and increasing timber harvest in the face of a collapse of many species. The risk to the broader environment and well-being of humans and other species due to removing one species after another because of our habitat destruction won't be fully known until it is too late to remedy the situation. It seems prudent to take whatever measures we can to find a balance between our use of the forests and our ability to be good stewards of all components of the ecosystem to insure a healthy ecosystem survives. If the spotted owl (as a representative species of all Pacific Northwest species) is threatened under current forestry practices, where is the science that proves definitively increasing our harvesting – especially clearcutting – is going to improve the chances of a balanced ecosystem surviving? Many of the questions outlined above should be applied to the broader environment when looking at the growing list of disappearing species.

As one of the owners of these public lands, I would urge BLM to NOT pursue increased timber harvests that eliminate important habitats for decades to come. Forests may be renewable but they are not hayfields that can regrow in a few months. The decisions we make today and in the near future will impact our forests well beyond the life-time of most people living in the northwest today.

5. Long-term planning steps for BLM Forest Management Treatments Need to be Laid out: As a resource management plan one would expect that the document would lay out at least some sense of

³ Northwest Forest Plan—The First 20 Years (1994-2013): Status and Trends of Late-Successional and Old-Growth Forests, by Raymond J. Davis, Janet L. Ohmann, Robert E. Kennedy, Warren B. Cohen, Matthew J. Gregory, Zhiqiang Yang, Heather M. Roberts, Andrew N. Gray, and Thomas A. Spies, June 2015, pg 4

the specific management guidelines BLM would use for each type of forest treatment – whether timber harvests or fuels reduction projects. It would be useful to know for example that any plantations established after a regeneration harvest would be thinned on a rotating basis of about X years in drier forests and about Y years in moister forests and what the specific follow up resource management steps would be as a general approach.

Our recent experience with BLM's management of several plantations near our own property provides a great example. When several areas were clearcut decades ago and replanted, the forest land was left unattended for probably 30 years or more. In late 2014, BLM sent in a contracted crew to do pre-commercial thinning of these two plantations. The land is extremely steep and runs along one side of our forestland up to a ridge and a BLM road. These trees were about 6-10" in diameter DBH, not small trees! Lop and scatter was not an option as this is all firewood size wood. While there is no question that the area needed to be thinned, we assumed that as part of the thinning that the thinned trees would be piled and burned to reduce the fire risk. When we called BLM about when the crew was coming back to pile and burn the huge amount of downed wood left on this extremely steep slope we were told there were no plans. The BLM employee admitted that the stand should have been thinned years and years ago but it fell off the radar screen. In southern Oregon, woody debris of this size will take many years to decompose to the point where it no longer presents a fire risk. If BLM is proposing to do either clearcuts or the pseudo clearcuts of regeneration harvests outlined in some of the alternatives, one has to be concerned about the long term follow-up of how any reforested areas may be managed. Our own experience is that follow-up can often be missing or poorly coordinated.

It would be valuable to have the final RMP lay out how BLM intends to manage its forests for the long-haul – even a table format would be helpful and might provide useful reminders to BLM employees in the future of what needs to be done for different types of stands on a regular or irregular basis in the moist versus dry forests. What are the specific steps that will guide the forest management applied to different forest resource types over the years?

A related concern that should be addressed in a resource management plan EIS is to present different scenarios about levels of government funding and their impacts on the recommendations being made for forest management. Speaking on a miniature scale relative to BLM, we have a forest management plan for our property. The treatment of different units is prioritized based on our view of what is most important. As money is available we work on different units based on their importance with reducing fire risk being first. What would BLM's priorities be faced with a smaller budget? How would that impact the long or short-term management plans?

In light of the steady reductions seen in BLM budgets and Forest Service in recent years, this seems to be an issue that should be covered by the RMP. As a member of the public living in Southern Oregon, if budgets were reduced and the programs that were cut were fuel treatments and improving fire resiliency for example, it would raise serious questions about the public's risk of wildfires increasing on BLM lands. What are BLM's management priorities for its forests if and when dollars get short? I strongly recommend that both of these issues be addressed in the final RMP.

6. Target Shooting Needs to be restricted to designated shooting areas: Despite many residents of the Applegate Valley making repeated reports to the Medford BLM about unsafe shooting practices, calling law enforcement, witnessing illegal shooting repeatedly, submitting landowner petitions and more, BLM has refused to address the ridiculous level of target shooting and the associated trash, and fire risk found throughout the Medford district. There are days when those of us living in the urban wildland interface feel as though we are in a war zone. Many people feel unsafe walking on BLM land and even their own lands. We have had constant problems of people shooting into our property while we were outside working. I am a strong supporter of hunting and believe people have a right to practice target practice. But BLM has allowed the creation of a safety nightmare for the public. I am glad to see that target practice was at least included in the recreation section of the RMP. But I would like to see further management guidelines for closing problem areas where target practice is creating a public safety hazard and destroying the ability of others to enjoy BLM land or even their own land safely. I recommend the final RMP include provisions for working with local communities to identify and create safe target practice areas and close the rest of the area (such as Anderson Butte in the Medford District) to such destructive activities. The trash and fire risk associated with these activities is equally bad.

7. Impacts of climate change on BLM's management plan should be considered: The RMP does include data from your modelling of the carbon capture and storage potential under different alternatives. This captures the contributions of BLM's forest management on CO2 emissions from forests. However, I did not see any discussion of how climate change might alter BLM's management of our forests. This omission is surprising in light of the text on pg. 79 of Volume I:

“Executive Order 13653, which directs agencies to assess climate change related impacts on and risks to the agency's ability to accomplish its missions, operations, and programs and consider the need to improve climate adaptation and resilience”

For example, if climate change results in a long-term shift of no snow pack in Oregon, longer, hotter summers with the attendant increased fire risk, disease outbreaks, one would hope that the priorities of BLM's management especially in the drier forests of Southern Oregon would make any necessary changes in its management plans to help our forests be more resilient to fire and disease. As someone who lives in the Medford BLM district, it was unsettling to read that BLM's modelling assumptions on the impact of fire on carbon storage assumed the 82.5 percent of the acres burned are forecast to occur in this district.⁴ It would be useful for BLM to develop potential scenarios that are discussed in this document about how priorities would change under different climate change outcomes. At this point, any assumption that weather patterns will be what they were even 20 years ago, may no longer be safe to plan on. Since less moisture could slow tree growth even further, how will the impacts of this ripple through most of the management expectations whether it is harvest levels, spotted owl habitat recovery, riparian areas needing maximum shade to cool water temperatures for fish and many other facets of the plan. It would be useful to know that BLM is considering this in its planning at this time.

8. Management of BLM lands in the Urban Wildland Interface that are not within recreation management areas (RMAs): Our property in Southern Oregon borders a small chunk of BLM land that is completely

⁴ BLM Draft RMP Western Oregon, Vol I, pg. 134.

surrounded by private properties – over 70 parcels/homes and private timber land. This piece of BLM land is definitely within the urban/wildland interface due to its proximity to Medford and the high density of private homes surrounding this small BLM parcel. One short dead-end road (BLM 38-2-21) leads into this BLM parcel; it is approximately 2.1 miles long, much of which passes over private land under easements from landowners to BLM. Part of the problem with BLM 38-2-21 is that it is on a dead-end forested ridge that gives the sense that there are no homes nearby. It appears secluded but it definitely is not, and more new homes are being built all around this BLM land every year.

This chunk of BLM land will ultimately be crossed by the Jack-Ash Trail under development by the Siskiyou Upland Trails Association and will become much more heavily used in the future at least along the trail route. It is used for recreation by people who live nearby in West Medford and by many of the property owners in the surrounding region. Owing to the small amount of BLM land involved and the short dead-end road providing access, it certainly does not qualify as a recreation management area. Unfortunately the periodic recreational use by a small number of people creates a series of risks and problems for adjacent land owners. While I do not expect the RMP to address such a small site specific issue, this situation represents an example of a management gap in the RMP. The RMP should provide management guidance so that community members experiencing problems have clarity about what BLM's management policies will be for non-RMA areas and what BLM's expected response might be to problems cause by recreation in non- RMA areas.

The most serious issues that this Applegate Valley neighborhood has had to deal with in the past several years are fires caused by people recreating on BLM Land, unsafe and illegal target shooting, and trash. In the past two years there have been more than four fires caused by people building illegal bonfires during fire season. Flames from one fire were seen from half a mile away. Three of these fires had to be extinguished by ODF and the Jacksonville Fire Department. The neighborhood put out the other large bonfire and has repeatedly checked and put out smoldering fires in fire rings during fire seasons. Partiers also left a significant amount of trash. Local residents spotted all of these fires. These fires all occurred during the height of fire season in 2013 and again in 2014. We consider ourselves fortunate that none of these huge bonfires caused a major forest fire destroying our private property, homes, private timberland, and BLM resources. So far this year, no campfires have gotten out of control, although we saw evidence of recent campfires on the BLM road in July. While we do not object to people having campfires when it is not during the fire season, those of us who live near this BLM land are extremely upset when people partying set large bonfires during the height of fire season and create high fire risk for surrounding landowners and the BLM.

Additionally, people have created illegal tracks off this BLM road creating major ruts up slopes, destroying a lovely meadow, cutting down trees so they can drive their trucks and cars off the BLM road and causing other damage to other resources in the process. Unfortunately, as elsewhere on BLM land, people also use the BLM road to dump their trash—ranging from couches, construction debris and even hazardous wastes. Some of this trash has been dumped on the private land that the BLM road passes through.

Finally, the uncontrolled target shooting on this road creates a totally unsafe situation year round for adjacent landowners. At least 70 homes are within 2,000 feet of this BLM land, and many of us have had

bullets pinging from trees while we were out working on our own properties. Additionally, I have had personal experience both alone and while out horseback riding with others where I was put at risk because of the illegal shooting across roads. In one instance I was threatened by two men who were shooting illegally down a spur BLM road – at a BLM gate and on down the road. When I politely informed the men that my neighbors' children often ride their motorcycles up that road and that it was not legal to shoot down or across the road they became furious and proceeded to shoot off their semi-automatic pistols right next to my horse.

The community has taken numerous steps to address these issues. We have posted signs, we have shared fire watch, carried out fuels reduction on our properties along the BLM road, and called BLM Law Enforcement about the fires and dumping. In 2013 the neighborhood offered to pay for and install a gate on the BLM road to prevent non-resident cars and trucks from driving on this road. We were turned down by the Medford BLM because they viewed this small chunk of BLM land as a valuable recreation opportunity for the public. We agree recreation should be allowed but leaving the road open to cars and trucks creates virtually all of the risk of fire, target shooting problems and dumping.

What policy direction will be put in the RMP that will direct future management for recreation where roads provide access to non-RMA BLM lands, especially in the urban wildland interface? How will BLM's management plan provide a balance between leaving BLM open to the public but not place an entire neighborhood at risk due to irresponsible actions of some people on BLM land? While I am a major advocate of providing recreational opportunities, some management provision should be made in the final RMP that addresses how to handle recreation and associated issues outside of designated RMAs. I have four specific recommendations to make:

1. Designate these non-RMA areas as closed to off highway vehicles or limited to authorized – designated roads and trails. Any existing unauthorized user created roads or trails should be closed.
2. Provide a specific and fast process for resolving community problems with public use of BLM lands such as the ones described above, within non-RMAs in the Urban Wildland interface and in other areas with a large concentration of private ownership. For example, the RMP could provide management guidance for district level decisions when deciding how to address community issues or other problems associated with public use of BLM lands. Examples of criteria could be the size of the BLM land area where the problem exists, the miles of road accessing the area, whether any access roads are through roads or key to accessing other roads, the number of private parcels in the immediate vicinity, the types of problems being experienced and the risk presented to adjacent or surrounding land owners, distance to alternative recreation areas if a non-RMA area no longer has road access, and more.
3. Set a schedule for completing travel management plans and complete the plans on schedule.
4. Create safe target shooting sites on BLM lands and close BLM lands to target shooting within the urban wildland interface or near areas with a high concentration of private homes.

I appreciate the opportunity to submit comments on the future management of my public lands and hope they are incorporated in the final RMP. Thank you for your efforts to tackle a very challenging and probably thankless task.

PLEASE DO NOT RELEASE MY PERSONAL INFORMATION

[REDACTED]

[REDACTED]

----- Forwarded message -----

From: **spring** [REDACTED]
Date: Fri, Aug 21, 2015 at 7:20 PM
Subject: Comments on RMP for Western Oregon
To: blm_or_rmpwo_comments@blm.gov

Please do not publish my full address, phone or email. You can use my name and zip code location. There was no stated time deadline for comments, please let me know if you will not accept mine, because it is after business hours on the day of the deadline. Thx.

August 21, 2015
RE: RMP for Western Oregon

BLM:

I live in the vicinity of the Applegate Adaptive Management Area and the proposed Dakubetede ACEC. I am very supportive of the work and intention of the original AMA for this area which requires a collaborative approach and management of this area for more than just logging. The Northwest Forest Plan ROD states, "The BLM will work with other organizations, government entities and private landowners in developing and testing new management approaches to integrate and achieve ecological, economic, and other social and community objectives."

As a community member, I have been actively involved with the Applegate Neighborhood Network and Siskiyou Uplands Trail Association, both groups in the past have successfully worked to get Memos of Understanding with the BLM. The AMA represents the values of this community which is no longer dependent on logging for its economy. Of higher value, to the neighbors I know, are the ecological attributes of the wildlands that remain near to our residences." Overall, I think it is important that the Applegate AMA, as well as other AMA's, not only continue to exist but be fortified in the final RMP for W. Oregon.

The 1995 Medford District Resource Management Plan advises that the BLM:

"Seek innovative approaches to achieve technical and social objectives. Develop localized, idiosyncratic methods that will best reflect the needs of the land and the communities. These approaches rely on the experience and ingenuity of resource managers and communities, rather than the traditionally derived and tightly prescriptive approaches that are generally applied in management of forests."

As is the way of most institutions, change is cumbersome, this call for innovation has been on the books for 20 years, now is time to really activate it, not get rid of it.

I live near the Little Applegate River and as a homesteader, I am dependent on it's clarity and flow, as is wildlife. I see a strong need for greater riparian buffers on public and private land,

which this draft of the RMP, actually chooses to diminish in size on public land across all of Western Oregon. Keep and implement the existing Aquatic Conservation Strategy.

I see no valid reason to throw out all the hard work that went into the Northwest Forest Plan, any new RMP should only strengthen it. Also, as I understand it, this current draft of the RMP seeks to devolve many of the existing ACEC's, these areas of special concern need greater support, not the opposite.

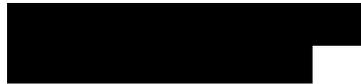
As I wait out another summer of smoke, I would like to see the BLM work on more small diameter stewardship projects for fuels reduction to compensate for decades of fire suppression. Every year, we do acres of fuels reduction on this piece of land. I think it is also important for the BLM to create easier avenues for smaller local forestry businesses to be able to bid on these fuel reductions projects.

This spring and summer, I watched speeding trucks full of gravel barrel down our normally quiet country road at the BLM's behest. Many neighbors called the Medford District to express their safety concerns. At this point, there are more than enough roads on BLM lands, and I believe the final RMP should seek to minimize the road system and not further extend it.

Overall, the wilderness-like areas of Western Oregon and beyond, have always been but are even more precious to the health of this planet in the face of climate change, not only for wildlife, but for humans, as well. I would like to see the BLM create an RMP that actually works to restore these damaged ecosystems, not further their demise. This is what I attempt to do on the land where I live that is bordered by BLM. In addition, I have read the comments sent in by the Siskiyou Uplands Trail Association and agree with their detailed feedback.

Sincerely,

Erin V. Mac Ivor



----- Forwarded message -----

From: **Duane Mallams** [REDACTED]
Date: Fri, Aug 21, 2015 at 1:04 PM
Subject: Comments on western Oregon RMP
To: "blm_or_rmpwo_comments@blm.gov" <blm_or_rmpwo_comments@blm.gov>

Dear BLM planning staff,

Thank you for the opportunity to comment on the proposed resource management plan for western Oregon.

1. Please increase the opportunities for non-motorized recreation on BLM lands.
2. Please support and include the Jack-Ash trail proposal by the Siskiyou Upland Trails Association (SUTA) and the Applegate Ridge Trail proposal by the Applegate Trails Association (ATA) in all plan alternatives for the Medford District BLM.
3. Do not reward any user group (motorized or non-motorized) that construct trails illegally and does not go through the NEPA process as required by law. Do not grandfather illegally constructed trails (whether newly constructed or constructed decades ago) into the BLM trail system as this only encourages more illegal trail building. In order to discourage the rampant construction of illegal trails on BLM land these trails must be closed and decommissioned. In the Medford District these trails were typically built along ridgelines following the fall line (unsustainable) destroying any rare plants or cultural resources in their path. To further discourage illegal trail construction, those caught constructing illegal trails should be severely punished.
4. Support groups such as SUTA and ATA who want to increase the number of non-motorized trails on BLM land. These groups are willing to spend years working through the NEPA process often at a cost of 10's of thousands of dollars and thousands of person hours before they ever start constructing a single sustainable trail. And then are willing to do the trail maintenance following construction. Do not slap them in the face by allowing illegally constructed trails into the BLM trail system.

Sincerely,
Duane Mallams, [REDACTED]

Jasmine Benjamin

From: fpaulete@blm.gov on behalf of RMPWO_Comments, BLM_OR
<blm_or_rmpwo_comments@blm.gov>
Sent: Saturday, August 22, 2015 11:57 AM
To: RMP-Comments@heg-inc.com
Subject: Fwd: RMPWO Comment - Specific XY

----- Forwarded message -----

From: <no_reply@blm.gov>
Date: Fri, Aug 21, 2015 at 11:40 PM
Subject: RMPWO Comment - Specific XY
To: blm_or_rmpwo_comments@blm.gov
Cc: [REDACTED]

Name: Conrad Gowell

Contact: [REDACTED]

Comment: This area is an important staging area for resident cutthroat trout and migrating summer steelhead in the North Fork Siletz.

This area has a very dense network of streams and also supports lamprey, marbled murrelet, spotted owls, Bald Eagles, red tree voles, and flying squirrels. This area is currently being harvested, and rotation age seems to be decreasing through time. Ecosystem services have seen cumulative impacts, such as reductions in stream flows, increases in flood events due to hydrological impacts from roads, and the reduction of stream connectivity through building culverts.

This patch of BLM land contributes large wood to the very important downstream spawning reaches of salmonids in main-stem Siletz, and thus buffer sizes should not be decreased. Many amphibians, such as the red-legged frog, pacific giant salamander, and tailed frog still persist here, and need increased protections.

Previous impacts, which have been accumulating on BLM land and in adjacent private land above and below the BLM ownership have been seen over time, including water temperature modifications (303-d listings), reductions in Large Woody Debris recruitment, incised stream channels due to loss of large woody debris, hydrological impacts through road building, loss of stream floodplain due to road building and excess sediment inputs as noted through macro invertebrate data in the preliminary MidCoast TMDL sediment assessment. Beavers have also been lost through much of this habitat area due to loss of forage material, and large wood structure that provides cover from predation.

The surrounding watershed is designated as a Tier 1 watershed, representing the best 10% of aquatic habitats on the Siuslaw National Forest, and should be considered for inclusion in the special area of environmental concern. The 2015 Draft Resource Management Plan/ EIS for Western Oregon does not adequately assess important ecological factors for this area, and is therefore insufficient. Losses of protection from the current aquatic conservation strategy are not acceptable, and thus the no-action alternative is preferable to any of the proposed alternatives (A-D). A more environmentally focused alternative, if provided, would have been preferred, but no such choice was presented.

Localized conditions contain large densities of perennial and intermittent streams sensitive to impacts described

in alternatives A-D. Continued stressors from anthropogenic impacts, including climate change, have decreased soil moisture content, and altered hydrological processes relative to old growth reference areas in the surrounding watershed. Site potential trees in the surrounding undisturbed forest reach 305 feet, and thus should be used for measuring site potential trees in calculating buffer sizes, an increase (not decrease) from existing standards.

None of the alternatives discuss how buffer widths are measured, so I do not know how to comment on the differing options will impact natural fluvial processes especially in areas of very steep slopes such as these. It also seems that only a narrow suite of environmental factors of interest are discussed in the EIS. For example, it has been documented in the scientific literature that stream and riparian forest communities are linked through processes beyond temperature and shade. In fact, habitat integrity is upheld through habitat heterogeneity that is often not the focus of timber harvest regimes. This is evident in this stand through single species reforestation efforts (Douglas Fir), and significant reductions in biodiversity.

Date and Time Submitted: 8/21/2015 11:40:21 PM

UTM10 X: 445065.78583879

UTM10 Y: 4974323.35161298

All Alts: True

Alt A Specific: False

Alt B Specific: False

Alt C Specific: False

Alt D Specific: False

Alt Unknown: False

Jasmine Benjamin

From: fpaulete@blm.gov on behalf of RMPWO_Comments, BLM_OR
<blm_or_rmpwo_comments@blm.gov>
Sent: Saturday, August 22, 2015 11:56 AM
To: RMP-Comments@heg-inc.com
Subject: Fwd: RMPWO Comment - Specific XY

----- Forwarded message -----

From: <no_reply@blm.gov>
Date: Fri, Aug 21, 2015 at 11:26 PM
Subject: RMPWO Comment - Specific XY
To: blm_or_rmpwo_comments@blm.gov
Cc: [REDACTED]

Name: Conrad Gowell

Contact: [REDACTED]

Comment: Trib 3 of Sampson Creek - has some of the largest trees in the Drift Creek watershed, supporting marbled murrelet, spotted owls, and Bald Eagles, red tree voles, and flying squirrels. This tributary was harvested and the stream was "cleaned" in the lower stretches, but is in a recovering state.

The small patch of BLM land contributes large wood to the very important downstream spawning reaches of salmonids in main-stem Sampson Creek, and thus buffer sizes should not be decreased. This area is largely intact, inter-gorge habitat with extremely steep slopes which can contribute to the stream from great distances. Many amphibians, such as the red-legged frog, pacific giant salamander, and tailed frog still persist here.

Previous impacts, which have been accumulating in adjacent private land above and below the BLM ownership have been seen over time, including water temperature modifications (303-d listings), reductions in Large Woody Debris recruitment, incised stream channels due to loss of large woody debris, hydrological impacts through road building, loss of stream floodplain due to road building and excess sediment inputs as noted through macro invertebrate data in the preliminary MidCoast TMDL sediment assessment. Beavers have also been lost through much of this habitat area due to loss of forage material, and large wood structure that provides cover from predation.

The surrounding watershed is designated as a Tier 1 watershed, representing the best 10% of aquatic habitats on the Siuslaw National Forest, and should be considered for inclusion in the special area of environmental concern. The 2015 Draft Resource Management Plan/ EIS for Western Oregon does not adequately assess important ecological factors for this area, and is therefore insufficient. Losses of protection from the current aquatic conservation strategy are not acceptable, and thus the no-action alternative is preferable to any of the proposed alternatives (A-D). A more environmentally focused alternative, if provided, would have been preferred, but no such choice was presented.

Localized conditions contain large densities of perennial and intermittent streams sensitive to impacts described in alternatives A-D. Continued stressors from anthropogenic impacts, including climate change, have decreased soil moisture content, and altered hydrological processes relative to old growth reference areas in the surrounding watershed. Site potential trees in the surrounding undisturbed forest reach 305 feet, and thus

should be used for measuring site potential trees in calculating buffer sizes, an increase (not decrease) from existing standards.

None of the alternatives discuss how buffer widths are measured, so I do not know how to comment on the differing options will impact natural fluvial processes especially in areas of very steep slopes such as these. It also seems that only a narrow suite of environmental factors of interest are discussed in the EIS. For example, it has been documented in the scientific literature that stream and riparian forest communities are linked through processes beyond temperature and shade. In fact, habitat integrity is upheld through habitat heterogeneity that is often not the focus of timber harvest regimes. This is evident in this stand through single species reforestation efforts (Douglas Fir), and significant reductions in biodiversity.

Date and Time Submitted: 8/21/2015 11:26:19 PM

UTM10 X: 433309.795660143

UTM10 Y: 4970612.82752527

All Alts: True

Alt A Specific: False

Alt B Specific: False

Alt C Specific: False

Alt D Specific: False

Alt Unknown: False

----- Forwarded message -----

From: [REDACTED]
Date: Fri, Aug 21, 2015 at 4:35 PM
Subject: Comments on draft RMP/EIS
To: "blm_or_rmpwo_comments@blm.gov" <blm_or_rmpwo_comments@blm.gov>

PLEASE WITHHOLD MY PERSONAL INFORMATION. THANK YOU.

Dear BLM,

Thank you for this opportunity to comment on the draft RMP/EIS for BLM lands in Western Oregon.

My main concern is how BLM will coordinate with the USFS on management activities that affect rare species, old growth and late successional forests, and watersheds on federal lands in western Oregon. Coordinated land management across federal forests is one of the major goals of the Northwest Forest Plan (NWFP) and it seems that coordinated land management is not part of any of the proposed Alternatives. This intention may be in the plan, but I believe the draft RMP/EIS lacks an explicit section that explains why the coordinated federal lands' management approach of the NWFP is no longer warranted and provides an analysis of the expected impacts to rare species and water quality of this shift in approach. Can the RMP include a section on how, or if, BLM will coordinate management activities with the USFS where lands are adjacent or in nearby proximity, in order to minimize impacts to watersheds and rare species?

Alternatives A through D all reduce stream and watershed protections from current levels. Can a scientific literature review be provided to allow the reader to understand what reductions in water quality, over the coming decade, can be expected as a result of the 4 different proposed reductions? The plan does not appear to provide information on how weakening the standards and guidelines currently in place under the NWFP and Aquatic Conservation Strategy will, or may, affect stream water quality and salmon habitat. If reductions in stream protections are implemented, then a high level of water and watershed quality monitoring is warranted to determine outcomes. And, if water quality indices decline from baseline levels (for example, of 2015 levels), will the RMP include a mechanism to stop or reverse management activities that may have caused the declines, to mitigate damages caused, and to also to halt future degradations?

A major purpose of BLM lands in western Oregon is to protect watersheds, for fish and wildlife and for human communities. This purpose is especially important in the face of changing climate, with expectations of future higher year-round temperatures with less snow and snowmelt. The RMP/EIS should include specific strategies for mitigating climate change effects on stream system integrity and aim toward maintaining heavy shading and restoring degraded stream systems to restore water storage capacity of streams and maintain cool water temperatures for as long as possible. With time, fresh

water may likely become the most critical natural resource of BLM lands in Western Oregon.

The RMP provides an estimate of the Value of Estimated Annual Stored Carbon on BLM lands at between \$99 and \$291 million dollars (Table 3-155, pg 502), based on the Social Cost of Carbon (SCC) in the absence of a carbon market in Oregon. The RMP does not address the very real possibility of emergence of a carbon market in Oregon. The state government of Oregon is researching the possibility of implementing a carbon market, as California has done and as Washington voters will consider in a 2016 Ballot initiative. It is likely that in the 10-20 year timeframe of the RMP that a carbon market in Oregon will arise. Carbon sequestration, then, could become a source of revenue from BLM lands. The RMP should include a set of goals and objectives to work with and encourage the state of Oregon to implement a carbon market and to seek ways of marketing sequestered carbon in BLM forests to benefit local communities and county governments.

I am concerned that the proposed Alternatives do not include any elements of the NWFP's Survey and Manage Standards and Guidelines for declining species associated with older forests. Because there will be land management activities within both the Late Successional Reserves and the Harvest Land Base, there will be strong potential to negatively impact these important native species, and also rare species' such as the Northern Spotted Owl and Marbled Murrelet. Regardless of the land use category in which activities such as timber management may occur, the best available science should be used to determine impacts to these species, and there is no substitute on-site knowledge. The RMP/EIS does not appear to provide an analysis of the potential negative impacts to the Survey and Management species.

I hope that the final RMP will expand upon the NWFP Forest Reserve system and make it the highest priority to improve the resiliency of Oregon's old growth and late successional forests and the species dependent on large tracts of these forests, particularly in the context of future warming climate, increasing wildfire probabilities, and in resisting invasive species impacts.

Thank you for your consideration of my comments.

Sincerely,

A black rectangular redaction box covering the signature area.

----- Forwarded message -----

From: **Candace Bonner** [REDACTED]
Date: Fri, Aug 21, 2015 at 11:38 AM
Subject: Comments on BLM RMPs proposed changes
To: blm_or_rmpwo_comments@blm.gov

August 04, 2015

Dear BLM staff:

Thank you for extending the deadline for comments on the proposed RMPs for Western Oregon. I have attended public meetings with you in 2014 and again this spring. I attached the comments I brought to each of those meetings as well, though much is repetitive. Reading your suggestions for useful comments, I will not focus on the alternative choices but stick mainly to general comments based on my personal experience living on forest land.

Riparian reserves:

My property, as I mentioned in the prior comments, is bordered by BLM, industrial timber, and small woodland owners. I share streams with all. BLM current practice “no action” results in healthy stream reaches and riparian habitat. This is not true of the industrial reaches, harvested under the FPA.

I have been involved in the recent efforts to change riparian buffer rules under the [REDACTED] as a member of the [REDACTED]. I mention this to convey that I have been involved in studying the riparian buffer issues; my views expressed here do not represent the views of that committee. You are probably aware that the Oregon Board of Forestry (BOF) again postponed a decision on new riparian rules. At the BOF meeting, the governor’s representative, Richard Whitman, presented fairly dire information on current listings of streams for failure to meet temperature standards. He also presented the predictions for stream warming over the next years and decades, which is even more dire. Your own EIS chapter on climate change has similar though less specific predictions. This BOF meeting took place in the setting of Oregon’s hottest year on record, record temperatures in our rivers and streams, and massive salmon die-offs due to the warm waters.

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The FPA tries to define the smallest riparian buffer, the least trees left behind, which can maintain stream health and temperature. There are many dangers and unintended consequences when following this path, as I discussed in prior comments, and I urge you not to take this path. Your current protection works.

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Oregon, as well as California and Washington and much of the country, is in a state of drought. EPA Chief Gina McCarthy stated definitively on May 13 in a speech at the Commonwealth Club that this drought is due to climate change. Climate change has multiple ties to human activity, and progressive deforestation of the planet is one contributor. I attended a conference at HJ Andrews Experimental Forest last year. They have long term studies in progress studying carbon sequestration. Taking many factors into account, it appears older trees are more effective than younger trees at sequestering carbon. This is no longer just a “tree hugger” claim. Even your own chapter on climate change in the EIS acknowledges this. President Obama has recently made some of his strongest statements on the need to act on climate change, such as “If we don’t get it right, we may not be able to reverse and we may not be able to adapt sufficiently,” With so few older trees left as a proportion of our Oregon forests, with such a poor prognosis for a newly planted tree to survive to 100-200 years of age, it makes no sense to cut down the older trees we still have. Sixty year old trees make fine timber. Older trees have more important functions.

Within a few minutes of walking out my back door, I can walk through your 20-30 year old forest, I can walk through your 120-130 year old forest, I can walk through the dense 13 year old industrial reforestation, I can walk through new clear cuts. In these hot summer days, subjectively the older forest seems significantly cooler than the younger forests. The coolness seems to be a function of not just how dense the canopy is, but how far above the ground the direct sunlight is blocked. I don’t know whether this has been studied, or whether this subjective

impression has validity. We did measure soil temperature in uncut forest and adjacent clearcut in one of my forestry classes, confirming the higher soil temperature in the clear cut. In another class, we read a study from the HOH River Valley, demonstrating that ground water is warmer under a harvested area, and that this increased temperature is transmitted even over a substantial distance to the stream draining the area. It makes sense to keep the ground cooler, and if indeed older stands do this best, it again argues for keeping older stands and older trees standing.

I volunteer for CoCoRaHS (Community Collaborative Rain Hail and Snow Network), recording precipitation and also evapotranspiration. I volunteered to add an evapotranspiration gauge because ET is so dramatic from my property, the ground and trees appearing to be smoking when the sun comes out after a rain. I never see this phenomenon in the BLM older tree stand, under the high canopy. Every day in this dry summer, as I record my zero for rain, I record a positive ET amount— water continues to go up, even without any water coming down. Again, in this time of climate change and drought, it is important to keep more water where it can be used, and lose less to the upward part of the water cycle.

In summary, older trees provide many important functions as specific habitat, in mitigating climate change, in keeping ground water cooler, in keeping precipitation where it can be best used in forest and stream ecology. It will be increasingly true that trees over 60 years of age will be found almost exclusively on government lands and conservation lands. Due to the changes in growing conditions expected with climate change, these older trees are irreplaceable when cut down. Therefore we need to preserve and protect what we have now. It makes no sense to sacrifice the long term benefits of older trees for short term timber dollars.

Timber:

Looking at your pie charts, with optimal riparian reserves and optimal late successional or older tree reserves, there is almost nothing left for timber. Is it possible BLM has no trees younger than 80 years which are not within the current riparian buffers?

The primary motive for revising RMPs as I understand it, is to increase harvests and timber sales and produce predictable amounts of board feet. The two primary drivers for increased timber production appear to be the O&C law itself, and the need for certain counties to receive federal timber income to pay for essential services.

The O&C law was written a long time ago, in the context of very different circumstances, prior to the imminent threats from climate change, prior to the current droughts and high stream temperatures which may be a result of that change. The production of timber is no longer the best use of these lands. As I have said before, the BLM staff I have met have all been knowledgeable and competent. There is no one better than BLM staff to assemble the current research and data, particularly the data on stream warming and climate change, and make the case to congress and the president, that higher timber production is not the best way for these lands to serve the needs of citizens. Neither of the O&C bills currently stagnating in Congress adequately protects streams and older trees.

The second driver, timber income to pay for essential county services, is a totally inappropriate coupling.

Should there be any harvesting at all? Your own climate change assessment finds that the highest carbon storage is achieved with the no harvest option. However, in younger forests less than 80 years old, and often dense and overgrown, I don't know anyone with any experience in forestry who believes that no harvest at all is the healthiest management. In my watershed, BLM has done thinning harvests down to 40% canopy, with the goal of having optimal growth of the remaining trees, to be harvested in a future clearcut. If the goal is maintaining habitat and ecological function, and mitigating climate change, rather than maximizing board feet, it would be preferable to see thinning leaving 60 -80% canopy, directed at reducing fuel, increasing average tree diameter, and progressing toward an older and structurally more complex forest, rather than a future clearcut. Interplanting of shade tolerant trees such as western hemlock and western red cedar is sometimes included in this management strategy. Another harvest type discussed at your meeting was small patch clearcuts of 1-4 acres, presumably in forests younger than 80 years. This seems to preserve forest habitat, add openings appropriate for other species, and to provide at least some amount of board feet. Clearcut "regeneration" harvests are the most cost effective way to harvest and provide opportunity to reforest with doug fir, but have the greatest negative impact on climate change mitigation, on habitat, on soil temperature. Given our current situation, given the predicted future temperature changes and progressing climate change, large scale clearcutting does not seem to be worth its cost to the environment. All your plans appear to utilize clear cut harvesting or low retention harvesting for timber production.

I will include again a link to a brief video by Oregon Field Guide on Hyla Woods, a family forestland managed by Peter Hayes, previously a member of the Oregon Board of Forestry. Peter's timber harvests are planned around improving forest health. It is well worth the few minutes it takes to watch it.

http://hylawoods.com/?page_id=614

Conclusion:

The very identity of Oregon is tied directly to our forest lands. When we picture our forests, we picture green forests with big, magnificent evergreens, clear, cold streams with salmon and trout, wild rivers, tall waterfalls, big wildlife— bear and deer and elk and cougar and bald eagle and other birds of prey— and the smaller wildlife, frogs and snakes and salamanders and songbirds. We don't picture clearcuts, or young regeneration forests. We picture hiking, camping, backpacking, rafting, canoeing, kayaking, fishing, in the rivers, in the forest. Traveling across the United States, traveling in Europe or Asia, anyone who learns you are from Oregon pictures you living in this land of green forests— and tells you how much they want to go there one day.

We can't expect industrial forestry to preserve beauty and provide recreation on their forestlands, much less think about how their forests can mitigate climate change. We have not even been successful in providing adequate protection of our waters on private forest lands. BLM, USFS,

and the State of Oregon are the stewards of our public forest lands, the forests that make Oregon Oregon. These forests need to balance the activities on private forest lands, not imitate them.

We harvest plenty of board feet from our private timberlands, and most of that is exported. Even the Hyla Woods family forest lands I mention above, which always makes a point of selling locally, had to export much of their harvest this year. People in California have been angry that during this drought, farmers are “exporting water” to China in the form of the water-hungry alfalfa crop. When we export timber, we are exporting water, soil nutrients, and our ability to store carbon. We get a few dollars which are rapidly spent, and provide us no long term benefit, and give up trees which would have served us in habitat and climate change mitigation for hundreds of years. It is not a good deal. I don’t think there is any excuse to cut trees on public lands specifically for timber unless there is a need and a market for this timber in the United States. As I said above, cutting trees in order to keep a younger forest healthy makes sense, ie commercial thinning.

I did not read but a few sections of your EIS. It was very slow and difficult to navigate, which seemed to be a problem for other people I spoke with. I apologize. The parts I read were well researched and referenced. I pasted below some excerpts from the climate chapter which I found particularly relevant.

Your management plans seem to be based on trade-offs. I would urge you to instead look at what management fits best with stewardship of our forests, our streams, our wildlife habitat, our access to recreation, our ability to mitigate climate change. I urge you to avoid decreasing riparian protection, to respond to current conditions of warming waters, to tailor your plans to the specific needs for the health of each watershed where BLM has land. I urge you to consider the long term effects of cutting older trees, the effects on each watershed, on climate change, on species distribution and the ability to have older stands with all their benefits in the future. I urge you as the trusted stewards of these forests, to give priority to the effect your decisions will have on the Oregon of the future.

Thank you for being a good neighbor, for keeping your streams healthy, in the midst of all the clearcutting and challenges to riparian health which surround me.

Candace Bonner



The Pacific Northwest (Oregon, Washington, Idaho, and western Montana) has experienced many of the changes noted globally and nationally. The Pacific Northwest has warmed by 1.3 oF since 1895, with statistically-significant warming in all seasons except spring, lengthening the frost-free period by 35 days (Snover *et al.* 2013). The frequency of extreme high nighttime temperatures has increased, with a statistically-significant increase west of the Cascade Mountains; however, no clear change in other temperature extremes has emerged (Dalton *et al.* 2013, Snover *et al.* 2013). Annual precipitation has no clear trend either upward or downward with high interannual variability (Snover *et al.* 2013). Although annual snowpack also fluctuates widely, generally snow accumulation is declining, and spring snowmelt is occurring earlier, leading to an earlier peak in streamflow in snowmelt-influenced streams (Snover *et al.* 2013). p142

Given the small increases in precipitation and the more statistically-significant increases in temperature, the entire planning area is becoming warmer and drier, particularly in winter and at night. p 143

In western Oregon, streams arising in the Coast Range are surface water-sourced from rain, whereas streams arising in the Cascades are groundwater-sourced from a mix of rain and snow, with predominately rain below 1,300 feet elevation, predominately snow above 4,900 feet, and a mix of rain and snow between 1,300 and 4,900 feet (Tague and Grant 2004, Safeeq *et al.* 2013, Klos *et al.* 2014). Total annual streamflow has been declining in the Pacific Northwest and current flows are similar to those in the 1930s, one of the driest periods on record (Luce *et al.* 2013). While scientists do not understand the exact causes, some combination of warming temperatures, decreasing snow, and decreasing mountain precipitation due to weakening of the westerly winds in winter appear to play a role (Dalton *et al.* 2013, Luce *et al.* 2013, Berghuijs *et al.* 2014).

Stream temperatures in the United States as a whole and in the Northwest have been increasing (Bartholow 2005, Kaushal *et al.* 2010, Dalton *et al.* 2013).

p 149

Northwest streams typically have cooling trends in spring, consistent with increasing precipitation, but warming temperatures in summer, fall, and winter. The cooling in spring is not enough to fully offset warming in the other seasons, leading to an overall warming trend in stream temperatures (Isaak *et al.* 2012). The rates of warming are highest in summer, with greater summer warming occurring in streams with the greatest decrease in discharge instead of the streams with the lowest discharge (Isaak *et al.* 2012). Overall, stream temperatures track with air temperatures, although there is often a slight lag (Isaak *et al.* 2012, Arismendi *et al.* 2013). Diabat *et al.* (2013) found that increasing nighttime temperatures appears to be a bigger driver of stream temperature changes than increasing daytime temperatures, indicating that the observed increasing minimum temperatures in all seasons may be important factors.

By 2041- 2070, temperatures are projected to increase in all seasons, with the greatest increase in summer (**Table 3- 25**). Precipitation is projected to increase modestly in winter, spring and fall and decrease in summer throughout the Pacific Northwest.

By 2014-2070, the number of frost-free days is projected to increase by 35 days (± 6 days) relative to 1971-2000. Climate modeling indicated the number of growing degree-days using a base of 50 oF would increase by 51 percent (± 14 percent). The number of hot days (i.e., days with maximum temperatures greater than 90 oF, 95 oF and 100 oF, as well as the number of consecutive days above 95 oF and 100 oF) would increase, while the cold days (with minimum temperatures of less than 32 oF, 10 oF, and 0 oF) would decline. The number of very wet days (with precipitation above 1 inch, 2 inches, 3 inches, and 4 inches) would increase, as would the dry spells (maximum run of days with less than 0.1 inch).

A characteristic of all these drought types is a low winter snowpack combined with high evapotranspiration demand during the growing season. The warm-dry drought; hot-dry drought; and very hot drought are also associated with more severe fire seasons in western Oregon.

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The fate of Douglas-fir is of particular interest due to its current dominance throughout western Oregon and importance for both timber and wildlife habitat. Many studies predict some degree of decline in the extent of Douglas-fir, particularly at lower elevations. The degree of decline varies widely between studies, ranging from major contractions, especially from the Coast Range, to little change (Bachelet *et al.* 2011 and references therein, Coops and Waring 2011, Peterson *et al.* 2014, Rehfeldt *et al.* 2014a).

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The bioclimatic envelope for seedlings of montane species, such as Douglas-fir and ponderosa pine, typically differ from and are narrower than the bioclimatic envelope in which established trees can persist (Bell *et al.* 2014).

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Mean summer streamflow is expected to continually decrease, becoming approximately 30 percent less by the end of the century (Wu *et al.* 2012)

Non-climate factors, such as degree of stream shading, amount of groundwater input, and how streams and reservoirs are managed are also important drivers of stream temperatures, and can result in stream cooling at the same time that air temperatures are warming (Arismendi *et al.* 2012). Regardless, in the Northwest, warming air temperatures and declining summer base flows are strongly associated with

warming stream temperatures (Kaushal *et al.* 2010, Isaak *et al.* 2012), with additional warming expected through the 21st century. If past trends continue, then some streams would be 1.6 to 2.0 oF warmer by mid-century than the 1980-2009 baseline (Isaak *et al.* 2012, Wu *et al.* 2012).

Fish and wildlife species considered most vulnerable to climate change include several terrestrial and many aquatic invertebrates; amphibians and cold-water fish, especially those with restricted ranges or narrow temperature requirements; and shorebirds, long-distance migratory birds that winter or stop over in western Oregon, and forest birds, especially those associated with either early seral habitat or old-growth habitat (Hixon *et al.* 2010 and references therein, NABCI 2014).

Changes in disturbance regimes could disfavor species associated with old-growth forests, by shifting more of the landscape into earlier seral stages, altering species compositions to ones less preferred, reducing the extent of large trees and structurally-complex forest, and decreasing patch sizes preferred for different life stages, such as nesting (Vose *et al.* 2012, Dalton *et al.* 2013, section 5.4.2, Peterson *et al.* 2014).

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Generally, recommended actions for responding to climate change consist of reducing existing stresses, increasing resistance and resilience to climate change and other stressors, and enabling change where it is inevitable (Joyce *et al.* 2009, Spies *et al.* 2010, Peterson *et al.* 2011, Vose *et al.* 2012, Peterson *et al.* 2014, Stein *et al.* 2014). As summarized by Joyce *et al.* (2009), Spies *et al.* (2010), and Peterson *et al.* (2011) specific types of recommended actions include—

- Thinning forest stands to reduce competition and drought stress, increase diversity (species, structure, age classes, sizes, patch sizes, spacing) at the stand and landscape scales, increase resistance to fire, insects, and pathogens; **protecting large old trees**, large snags, and large downed wood

August 04, 2015

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distribution. (Your own EIS chapter on climate change also discusses this.) The short rotations of industrial timber are eliminating most trees over 50 years old, now and in the future, on timber company lands. Government lands, and a few private lands, will have the only older trees. We need to protect what we have. The age cut-off for these older trees has not been established. At this point, I think we should all agree to count trees over 100 years of age as old enough to be protected. Given the above discussion, it is arguable that the age cut-off should be 80 years of age. More important is the context, as I mentioned above in the discussion of my watershed. BLM needs to look at its older stands in the context of the watersheds in which they occur.

One argument against protecting older trees unless they are part of a “structurally complex” forest, is that they are not special, and do not provide anything different than the newly planted trees which replace them will provide over time. Again, in the context of our increasingly younger average tree age, I do not believe this is true. For example, for many years a spotted owl visited the fringes of my property regularly if infrequently, staying around 7- 10 days each visit. The spotted owl can be considered a marker for older tree habitat, and for other species requiring this habitat. He seemed to have his headquarters in the 120+ year old BLM forest on my border, although I never found a nest, and he may have had his nest far up the watershed in the older USFS forest. However, the older BLM trees clearly did provide part of his home range and hunting territory, “old growth” or not, and newly planted trees replacing these older trees would not serve this purpose for many decades.

Oregon, as well as California and Washington and much of the country, is in a state of drought. EPA Chief Gina McCarthy stated definitively on May 13 in a speech at the Commonwealth Club that this drought is due to climate change. Climate change has multiple ties to human activity, and progressive deforestation of the planet is one contributor. I attended a conference at HJ Andrews Experimental Forest last year. They have long term studies in progress studying carbon sequestration. Taking many factors into account, it appears older trees are more effective than younger trees at sequestering carbon. This is no longer just a “tree hugger” claim. Even your own chapter on climate change in the EIS acknowledges this. President Obama has recently made some of his strongest statements on the need to act on climate change, such as “If we don’t get it right, we may not be able to reverse and we may not be able to adapt sufficiently,” With so few older trees left as a proportion of our Oregon forests, with such a poor prognosis for a newly planted tree to survive to 100-200 years of age, it makes no sense to cut down the older trees we still have. Sixty year old trees make fine timber. Older trees have more important functions.

Within a few minutes of walking out my back door, I can walk through your 20-30 year old forest, I can walk through your 120-130 year old forest, I can walk through the dense 13 year old industrial reforestation, I can walk through new clear cuts. In these hot summer days, subjectively the older forest seems significantly cooler than the younger forests. The coolness seems to be a function of not just how dense the canopy is, but how far above the ground the direct sunlight is blocked. I don’t know whether this has been studied, or whether this subjective impression has validity. We did measure soil temperature in uncut forest and adjacent clearcut in one of my forestry classes, confirming the higher soil temperature in the clear cut. In another class, we read a study from the HOH River Valley,

demonstrating that ground water is warmer under a harvested area, and that this increased temperature is transmitted even over a substantial distance to the stream draining the area. It makes sense to keep the ground cooler, and if indeed older stands do this best, it again argues for keeping older stands and older trees standing.

I volunteer for CoCoRaHS (Community Collaborative Rain Hail and Snow Network), recording precipitation and also evapotranspiration. I volunteered to add an evapotranspiration gauge because ET is so dramatic from my property, the ground appearing to be smoking when the sun comes out after a rain. I never see this phenomenon in the BLM older tree stand, under the high canopy. Every day in this dry summer, as I record my zero for rain, I record a positive ET amount— water continues to go up, even without any water coming down. Again, in this time of climate change and drought, it is important to keep more water where it can be used, and lose less to the upward part of the water cycle.

In summary, older trees provide many important functions as specific habitat, in mitigating climate change, in keeping ground water cooler, in keeping precipitation where it can be best used in forest and stream ecology. It will be increasingly true that trees over 60 years of age will be found almost exclusively on government lands and conservation lands. Due to the changes in growing conditions expected with climate change, these older trees are irreplaceable when cut down. Therefore we need to preserve and protect what we have now. It makes no sense to sacrifice the long term benefits of older trees for short term timber dollars.

Timber:

Looking at your pie charts, with optimal riparian reserves and optimal late successional or older tree reserves, there is almost nothing left for timber. Is it possible BLM has no trees younger than 80 years which are not within the current riparian buffers?

The primary motive for revising RMPs as I understand it, is to increase harvests and timber sales and produce predictable amounts of board feet. The two primary drivers for increased timber production appear to be the O&C law itself, and the need for certain counties to receive federal timber income to pay for essential services.

The O&C law was written a long time ago, in the context of very different circumstances, prior to the imminent threats from climate change, prior to the current droughts and high stream temperatures which may be a result of that change. The production of timber is no longer the best use of these lands. As I have said before, the BLM staff I have met have all been knowledgeable and competent. There is no one better than BLM staff to assemble the current research and data, particularly the data on stream warming and climate change, and make the case to congress and the president, that higher timber production is not the best way for these lands to serve the needs of citizens. Neither of the O&C bills currently stagnating in Congress adequately protects streams and older trees.

The second driver, timber income to pay for essential county services, is a totally inappropriate coupling.

Should there be any harvesting at all? Your own climate change assessment finds that the highest carbon storage is achieved with the no harvest option. However, in younger forests less than 80 years old, and often dense and overgrown, I don't know anyone with any experience in forestry who believes that no harvest at all is the healthiest management. In my watershed, BLM has done thinning harvests down to 40% canopy, with the goal of having optimal growth of the remaining trees, to be harvested in a future clearcut. If the goal is maintaining habitat and ecological function, and mitigating climate change, rather than maximizing board feet, it would be preferable to see thinning leaving 60 -80% canopy, directed at reducing fuel, increasing average tree diameter, and progressing toward an older and structurally more complex forest, rather than a future clearcut. Interplanting of shade tolerant trees such as western hemlock and western red cedar is sometimes included in this management strategy. Another harvest type discussed at your meeting was small patch clearcuts of 1-4 acres, presumably in forests younger than 80 years. This seems to preserve forest habitat, add openings appropriate for other species, and to provide at least some amount of board feet. Clearcut "regeneration" harvests are the most cost effective way to harvest and provide opportunity to reforest with doug fir, but have the greatest negative impact on climate change mitigation, on habitat, on soil temperature. Given our current situation, given the predicted future temperature changes and progressing climate change, large scale clearcutting does not seem to be worth its cost to the environment. All your plans appear to utilize clear cut harvesting or low retention harvesting for timber production.

I will include again a link to a brief video by Oregon Field Guide on Hyla Woods, a family forestland managed by Peter Hayes, previously a member of the Oregon Board of Forestry. Peter's timber harvests are planned around improving forest health. It is well worth the few minutes it takes to watch it.

http://hylawoods.com/?page_id=614

Conclusion:

The very identity of Oregon is tied directly to our forest lands. When we picture our forests, we picture green forests with big, magnificent evergreens, clear, cold streams with salmon and trout, wild rivers, tall waterfalls, big wildlife— bear and deer and elk and cougar and bald eagle and other birds of prey— and the smaller wildlife, frogs and snakes and salamanders and songbirds. We don't picture clearcuts, or young regeneration forests. We picture hiking, camping, backpacking, rafting, canoeing, kayaking, fishing, in the rivers, in the forest. Traveling across the United States, traveling in Europe or Asia, anyone who learns you are from Oregon pictures you living in this land of green forests— and tells you how much they want to go there one day.

We can't expect industrial forestry to preserve beauty and provide recreation on their forestlands, much less think about how their forests can mitigate climate change. We have not even been successful in providing adequate protection of our waters on private forest lands. BLM, USFS, and the State of Oregon are the stewards of our public forest lands, the forests that make Oregon Oregon. These forests need to balance the activities on private forest lands, not imitate them.

We harvest plenty of board feet from our private timberlands, and most of that is exported. Even the Hyla Woods family forest lands I mention above, which always makes a point of selling locally, had to export much of their harvest this year. People in California have been angry that during this drought, farmers are “exporting water” to China in the form of the water-hungry alfalfa crop. When we export timber, we are exporting water, soil nutrients, and our ability to store carbon. We get a few dollars which are rapidly spent, and provide us no long term benefit, and give up trees which would have served us in habitat and climate change mitigation for hundreds of years. It is not a good deal. I don’t think there is any excuse to cut trees on public lands specifically for timber unless there is a need and a market for this timber in the United States. As I said above, cutting trees in order to keep a younger forest healthy makes sense, ie commercial thinning.

I did not read but a few sections of your EIS. It was very slow and difficult to navigate, which seemed to be a problem for other people I spoke with. I apologize. The parts I read were well researched and referenced. I pasted below some excerpts from the climate chapter which I found particularly relevant.

Your management plans seem to be based on trade-offs. I would urge you to instead look at what management fits best with stewardship of our forests, our streams, our wildlife habitat, our access to recreation, our ability to mitigate climate change. I urge you to avoid decreasing riparian protection, to respond to current conditions of warming waters, to tailor your plans to the specific needs for the health of each watershed where BLM has land. I urge you to consider the long term effects of cutting older trees, the effects on each watershed, on climate change, on species distribution and the ability to have older stands with all their benefits in the future. I urge you as the trusted stewards of these forests, to give priority to the effect your decisions will have on the Oregon of the future.

Thank you for being a good neighbor, and keeping your streams healthy, in the midst of all the clearcutting and challenges to riparian health which surround me.

Candace Bonner

[REDACTED]

Excerpts from EIS chapter on Climate Change

The Pacific Northwest (Oregon, Washington, Idaho, and western Montana) has experienced many of the changes noted globally and nationally. The Pacific Northwest has warmed by 1.3 oF since 1895, with statistically-significant warming in all seasons except spring, lengthening the frost-free period by 35 days (Snover *et al.* 2013). The frequency of extreme high nighttime temperatures has increased, with a statistically-significant increase west of the Cascade Mountains; however, no clear change in other temperature extremes has emerged (Dalton *et al.* 2013, Snover *et al.* 2013). Annual precipitation has no clear trend either upward or downward with high interannual variability (Snover *et al.* 2013). Although annual snowpack also fluctuates widely, generally snow accumulation is declining, and spring snowmelt is occurring earlier, leading to an earlier peak in streamflow in snowmelt-influenced streams (Snover *et al.* 2013). p142

Given the small increases in precipitation and the more statistically-significant increases in temperature, the entire planning area is becoming warmer and drier, particularly in winter and at night. p 143

In western Oregon, streams arising in the Coast Range are surface water-sourced from rain, whereas streams arising in the Cascades are groundwater-sourced from a mix of rain and snow, with predominately rain below 1,300 feet elevation, predominately snow above 4,900 feet, and a mix of rain and snow between 1,300 and 4,900 feet (Tague and Grant 2004, Safeeq *et al.* 2013, Klos *et al.* 2014). Total annual streamflow has been declining in the Pacific Northwest and current flows are similar to those in the 1930s, one of the driest periods on record (Luce *et al.* 2013). While scientists do not understand the exact causes, some combination of warming temperatures, decreasing snow, and decreasing mountain precipitation due to weakening of the westerly winds in winter appear to play a role (Dalton *et al.* 2013, Luce *et al.* 2013, Berghuijs *et al.* 2014).

Stream temperatures in the United States as a whole and in the Northwest have been increasing (Bartholow 2005, Kaushal *et al.* 2010, Dalton *et al.* 2013).

Northwest streams typically have cooling trends in spring, consistent with increasing precipitation, but warming temperatures in summer, fall, and winter. The cooling in spring is not enough to fully offset warming in the other seasons, leading to an overall warming trend in stream temperatures (Isaak *et al.* 2012). The rates of warming are highest in summer, with greater summer warming occurring in streams with the greatest decrease in discharge instead of the streams with the lowest discharge (Isaak *et al.* 2012). Overall, stream temperatures track with air temperatures, although there is often a slight lag (Isaak *et al.* 2012, Arismendi *et al.* 2013). Diabat *et al.* (2013) found that increasing nighttime temperatures appears to be a bigger driver of stream temperature changes than increasing daytime temperatures, indicating that the observed increasing minimum temperatures in all seasons may be important factors.

By 2041- 2070, temperatures are projected to increase in all seasons, with the greatest increase in summer (**Table 3- 25**). Precipitation is projected to increase modestly in winter, spring and fall and decrease in summer throughout the Pacific Northwest.

By 2014-2070, the number of frost-free days is projected to increase by 35 days (± 6 days) relative to 1971-2000. Climate modeling indicated the number of growing degree-days using a base of 50 oF would increase by 51 percent (± 14 percent). The number of hot days (i.e., days with maximum temperatures greater than 90 oF, 95 oF and 100 oF, as well as the number of consecutive days above 95 oF and 100 oF) would increase, while the cold days (with minimum temperatures of less than 32 oF, 10 oF, and 0 oF) would decline. The number of very wet days (with precipitation above 1 inch, 2 inches, 3 inches, and 4 inches) would increase, as would the dry spells (maximum run of days with less than 0.1 inch).

A characteristic of all these drought types is a low winter snowpack combined with high evapotranspiration demand during the growing season. The warm-dry

drought; hot-dry drought; and very hot drought are also associated with more severe fire seasons in western Oregon.

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The fate of Douglas-fir is of particular interest due to its current dominance throughout western Oregon and importance for both timber and wildlife habitat. Many studies predict some degree of decline in the extent of Douglas-fir, particularly at lower elevations. The degree of decline varies widely between studies, ranging from major contractions, especially from the Coast Range, to little change (Bachelet *et al.* 2011 and references therein, Coops and Waring 2011, Peterson *et al.* 2014, Rehfeldt *et al.* 2014a).

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The bioclimatic envelope for seedlings of montane species, such as Douglas-fir and ponderosa pine, typically differ from and are narrower than the bioclimatic envelope in which established trees can persist (Bell *et al.* 2014).

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Mean summer streamflow is expected to continually decrease, becoming approximately 30 percent less by the end of the century (Wu *et al.* 2012)

Non-climate factors, such as degree of stream shading, amount of groundwater input, and how streams and reservoirs are managed are also important drivers of stream temperatures, and can result in stream cooling at the same time that air temperatures are warming (Arismendi *et al.* 2012). Regardless, in the Northwest, warming air temperatures and declining summer base flows are strongly associated with

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warming stream temperatures (Kaushal *et al.* 2010, Isaak *et al.* 2012), with additional warming expected through the 21st century. If past trends continue, then some streams would be 1.6 to 2.0 oF warmer by mid-century than the 1980-2009 baseline (Isaak *et al.* 2012, Wu *et al.* 2012).

Fish and wildlife species considered most vulnerable to climate change include several terrestrial and many aquatic invertebrates; amphibians and cold-water

fish, especially those with restricted ranges or narrow temperature requirements; and shorebirds, long-distance migratory birds that winter or stop over in western Oregon, and forest birds, especially those associated with either early seral habitat or old-growth habitat (Hixon *et al.* 2010 and references therein, NABCI 2014).

Changes in disturbance regimes could disfavor species associated with old-growth forests, by shifting more of the landscape into earlier seral stages, altering species compositions to ones less preferred, reducing the extent of large trees and structurally-complex forest, and decreasing patch sizes preferred for different life stages, such as nesting (Vose *et al.* 2012, Dalton *et al.* 2013, section 5.4.2, Peterson *et al.* 2014).

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Generally, recommended actions for responding to climate change consist of reducing existing stresses, increasing resistance and resilience to climate change and other stressors, and enabling change where it is inevitable (Joyce *et al.* 2009, Spies *et al.* 2010, Peterson *et al.* 2011, Vose *et al.* 2012, Peterson *et al.* 2014, Stein *et al.* 2014). As summarized by Joyce *et al.* (2009), Spies *et al.* (2010), and Peterson *et al.* (2011) specific types of recommended actions include—

- Thinning forest stands to reduce competition and drought stress, increase diversity (species, structure, age classes, sizes, patch sizes, spacing) at the stand and landscape scales, increase resistance to fire, insects, and pathogens; **protecting large old trees**, large snags, and large downed wood

June 15, 2015

Dear BLM staff:

Please see the enclosed copy of the letter I sent you last spring after a public meeting on your new plans. Note I did ask for your EIS when it came out, and also notification of future public meetings. I don't think I received either. I heard about tomorrow's meeting only yesterday, and only by chance.

First, I have a high opinion of BLM and its staff. You are my neighbor, bordering my 109 acres on the east, in the [REDACTED] watershed. You have generally been a good neighbor, informing me of your activities that affect me, responding to my questions and criticism. I have much respect for your forester, Keith Walton, though we disagree about almost everything, and for your hydrology staff, Patrick Hawe and Kirk Appleman. Mr Walton may have retired, which might explain why I did not receive the EIS nor notice of this series of meetings.

I will not repeat the points I made last March, under the assumption that you will reread the letter I sent then and enclose now.

One of my main criticisms of your planning process remains that you fail to formulate your plans in the context of what else is going on in a watershed, and going on in forestry in Oregon.

Another basic problem is the mandate to produce and harvest timber. Much has changed since that mandate. BLM land is public land, belonging to all of us. The mandate needs to be to manage that land in the best interest of all the people of Oregon, the people of the United States, and one could even say, the planet. The increasing scarcity of water for habitat, drinking, and agriculture, our low snow pack year with frequent future low snow pack years predicted, the basic changes in private forestry with the short rotations and dense replanting, resulting in profound changes in available habitat types, all need to be taken into account. Maximizing board feet of harvest each year is not likely to represent the best interest of the people of Oregon. The mandate needs to be revisited in the context of current conditions. Again, you cannot formulate your plans in a vacuum, as if the world around you is not changing.

The other big stumbling block to rational management is the linking of county services to harvest income. That has never worked well, and needs to be uncoupled. This uncoupling should be a priority at county, state, and federal levels. County services are essential. However, we cannot afford to sacrifice the long term health of Oregon's public forests and waters to fund short term county services. We need to bite the bullet and develop a more rational and stable source of county funding. I for one am willing to be taxed to help pay for services in other counties. Meanwhile, forest management should be based on the best management of this resource, not on what will best fund county services.

Perhaps of most concern is your proposed decrease in riparian protection under some of the options. As you know, the riparian protection under the FPA has been demonstrated to be inadequate to meet the CWA. As I discussed in my 2014 comments, I live where I can watch what happens to streams before, just after, and years after harvests under BLM and the FPA. Current BLM practice results in shady, healthy-appearing streams. The FPA RMAs have a no cut line of 20 ft, and active management is permitted in the rest of the RMA down to a set basal area, with many options for getting basal area credits without leaving standing trees. This often results in cutting most trees down to 20 ft from the stream.

We know from the Ripstream studies that shade is the primary determinant of maintenance of cold water, and we know there is some correlation with basal area and shade. We also know that healthy stream habitat requires LWD for structure, that to provide long term LWD to streams, we need a healthy RMA with trees growing big and old and dying and regrowing in long term cycles. How many big doug fir do you see growing within 20 ft of the stream? Or even within your "inner" RMA zone? And while basal area sounds good on paper, in reality it makes sense for loggers to take all the bigger trees, leave three 8 inch DBH trees for example, and take a 24 inch doug fir. And whenever possible, to take conifers and leave hardwood as basal area requirements permit. Whenever we depart from the no entry RMA, or no entry inner RMA of sufficient width (100 +ft per the data available) we make it less likely we will have a self renewing RMA, providing long term LWD, and we endanger long term riparian habitat. Please do not move away from BLM's current no entry RMA.

When I walk along the streams in my watershed, I see healthy appearing reaches on the BLM land. On industrial land I see that the zero to two trees in the no cut zone often did not have the root structure to stand alone in the winter winds, and many are down within the first two years. I see stream reaches which were bordered by big conifers, deeply shaded, now with a few smaller trees and many gaps, and sunshine on the water. I see a recently harvested perennial small n stream which was previously in deep and old woods, and replete with the neotenic larvae of the the Pacific Giant salamander, now hardly recognizable as a stream. On the ground, it looks much worse than it sounded on paper.

Your plans should require you to look carefully at what else is going on in a watershed when you plan an operation, and to talk directly to other landowners about their plans, and adjust your plans accordingly. Your mandate, again, should be to balance what is going on for the overall health of each watershed, to manage your lands in the best interest of all the people of Oregon. If yours will be the only remaining stand of 60+ year old conifers in the watershed, it is not likely to be in the interest of overall wildlife habitat to cut them.

Please follow the link below to a brief video about a family forestry business which bases its operations and harvests on the best management for overall forest health. I believe this is what many Oregonians envision as the way we should be growing and harvesting timber.

http://hylawoods.com/?page_id=614

Sincerely,

Candace Bonner

A black rectangular redaction box covering the signature area.

I submitted this to you at the spring, 2014 meeting. I did not receive a reply, and did not receive notification of future public commentary opportunities as requested. I clearly did not understand the differences between specific plans, so please ignore the references to specific alternatives. This was also before our current drought, and record high stream temperatures with salmon die-offs.

March 30, 2014

Dear BLM staff:

Thank you for this opportunity to comment on the preliminary alternatives in the BLM planning document. I had hoped to read through the entire document on CD prior to commenting, but did not have time to do so. Some of my concerns may be answered in that document. I did manage to read through the O&C bill proposed by Senator Wyden. I am assuming that if this bill passes, as it is likely to do, it will affect which alternatives show up in the draft RMP/EIS.

I found the public meeting informative, though poorly attended. I found out about it by chance. I am surprised that those of us who have commented previously are not informed by email. Also, have you have considered informing the forestry professors at the community colleges which have Natural Resources Technology programs, so they could encourage their students to attend? I would be interested to learn how this meeting was announced to the public.

I live in the [REDACTED] watershed, and share my eastern boundary with BLM. To the south, I share my boundary with a younger BLM forest of 20+ years, including an experimental alder forest. Farther north, I share my boundary with older BLM trees in the 120 year old range. To the south and west, I share boundaries with industrial timber. I share streams with both BLM and industrial timber. I have had the opportunity to tour the recent BLM [REDACTED] harvests. I am familiar therefore with current BLM practice, or at least recent practice, and the contrast with industrial timber practice under the FPA. As your neighbor, I will be directly affected by your changes in management, so would appreciate being included on the list of those you inform of meetings, public commentary opportunities, and would also appreciate copies of the documents expected in the fall, etc. Thank you.

Four alternatives were presented to us at the public meeting, each covering four areas: Riparian management, timber management, endangered species habitat, and recreation. We were asked to mix and match, or come up with our own "alternative" for each area. It would have been helpful to have current BLM practice outlined in these four areas, in order to see how much current practice would change with each proposed alternative.

Riparian: High quality water is valuable, becoming ever more valuable with climate change. Current/recent BLM management in Gordon Creek watershed is successful in preserving shade, and maintaining fish and amphibian habitat. This is in contrast to management under the FPA, which the Ripstream series of studies has finally demonstrated to be inadequate. The FPA does not operate under the "First of all do no harm" principle. It is designed to provide private timber companies the maximum ability to harvest trees, without harming the waters of the state. Harm must be proven in order for the rules to change. It is extremely difficult to prove harm, even when much harm is occurring, due to the nature of scientific studies, the B power of studies, etc. BLM management appears to do no harm currently. If riparian protection is lessened, it will be difficult to prove harm even if there is a significant change. Over the next timber rotation, the value of clean, cold water will far exceed any dollar value of additional timber harvested by decreasing the RMA (riparian management area) and no cut zone. I believe that alternative A is closest to current BLM riparian management.

Large Block Forest Reserves: Alternative A makes the most sense to me for this as well. Endangered species are usually markers for far reaching changes in ecology, affecting many species and creating multiple chains of interaction. Maximizing the protection of the habitats which are becoming most limited makes sense in the broader, overall picture of managing Federal lands.

Protection of older forests: Again, alternative A provides the most appropriate protection. Industrial timber companies, and increasing numbers of small woodlands owners as well, have moved to much shorter rotations, often 40-45 years. Timber has become similar to intensively managed agriculture, tightly planted, no thinning, and harvested after a short rotation. This means, once the older trees are cut, there will be no more older trees on these lands. We need to protect and preserve the remaining older trees on our federal lands, as the habitat they represent becomes increasingly scarce. I would even suggest moving to 100 or 110 years old as the cut off.

Recreation: These lands belong to all the people, and recreation is the main way most people experience these lands. Existing SMRAs should continue to be supported. I believe alternative 3 best captures the need to do this, as well as to identify additional areas which provide special opportunity.

One aspect which is not mentioned, is beauty. Clearcuts and stumps are interesting to view, and to watch as areas are replanted, but they do not usually move the heart and soul or inspire poetry. Many of the best quality timber trees are, well, a bit uninteresting. Foot paths through areas of filtered light, where trillium and wild flowers and native shrubs abound, where the occasional giant tree so much older than oneself inspires awe and respect, where a little headwater stream provides the background sounds, these areas are important to have available to the public on foot. My trails are like that, and incredibly healing. Most foresters have a great eye for the straight and symmetric high quality tree, but not all appreciate such as the gnarled and curling roots and fluted trunk of a great western red cedar, its beauty decreasing its timber value, or the old snag with a western hemlock growing on top, its roots wrapping and snaking around the snag to the ground. I did not know about the recreation meeting, and do not know

whether the opportunities for simple walks on footpaths through ordinary woods was discussed, or whether there is an effort to identify areas of everyday beauty.

Timber: This is the tricky part. The whole reason for changing management is to increase timber yield. I don't like any of the alternatives, compared with current BLM thinning with 40% crown cover retention. I think the O&C act of 1937 needs to be changed, though I have many concerns with Senator Wyden's version.

First of all, timber management needs to take in the situation in the entire watershed in question. BLM ownership in Gordon Creek watershed is patchy, and I assume it is so in other watersheds, with industrial timber companies often the biggest landowners. BLM needs to look at the effect the management on other lands is having on each watershed. The harvest plan chosen, should balance what is already going on in the watershed.

All the alternatives include clear cuts. Clear cutting is the most cost effective way to harvest and regrow doug fir. As it is practiced under the FPA currently, it is the most damaging to habitat and natural succession. In the O&C bill, "ecological forestry" is proposed, which appears to be similar to your options with clearcutting and variable 10-30% retention, with the retention to be in clumps. The idea, as it was explained to me, is to encourage the early seral stage of succession, which has become quite rare due to industrial timber management with heavy use of herbicides after harvest, so that only the replanted trees, usually doug fir, can grow, and the early seral stage with native shrubs and hardwoods so important to much wildlife, is skipped.

BLM hopefully will continue to eschew the use of herbicides. Given that, if indeed an early seral stage of hardwoods and shrubs is permitted, it will be difficult to plant these areas later with doug fir. Either you will need to move to shade-tolerant species like cedar and hemlock, with doug fir on the edges, or do heavy handwork and cutting. At your meeting no one could explain to me how this would work, though perhaps it is explained on the CD. I discussed this with OSU foresters at Tree School, and they basically said that this method of trying to sustainably harvest while restoring the early seral stage is untested, and no one is sure of the outcome.

Most of the alternatives listed include harvesting inside critical habitat, which contradicts the idea of critical habitat being critical.

At the meeting we discussed small clearcuts of 1-5 acres, interspersed with thinning with higher retention rates, which might be more appropriate for some watersheds.

Sustainable harvests means, I think, that for every mature tree cut, another tree is reaching maturity on BLM land. The term sustainable does not really speak to number of board feet harvested yearly, except that it should not exceed the number of board feet coming to maturity each year. Your four alternatives tried to maintain a zero sum, more for this, then less for that, so that timber yield might be appropriately the same? I think that was the idea? However, because these are federal forests, multi-use forests and not agricultural plantations, land which belongs to all the people, all four areas really should be optimized--- riparian, ESA habitat, recreation, with timber fitting itself in AFTER the first three are optimized. We really cannot afford to compromise riparian

health or ESA habitat, for reasons discussed above. Recreation may be as great an economic factor for the counties as timber harvest, and the opportunity to enjoy our public forest lands with recreation seems almost a basic right of public ownership.

I apologize for commenting off the cuff, at the last minute, without reviewing all relevant materials. I will do better I hope at reviewing the draft RMP/EIS when it becomes available. I appreciate having such a good neighbor as BLM, appreciate that BLM asks for public input, and that foresters like Keith Walton take the time to respond to concerns even when completely disagreeing with the viewpoint expressed. Thank you for your time.

Candace Bonner

[REDACTED]

(If public comments are made available to the public, please leave out the address)

----- Forwarded message -----

From: **RMPs_WesternOregon, BLM_OR** <blm_or_rmps_westernoregon@blm.gov>
Date: Sat, Aug 22, 2015 at 8:27 AM
Subject: Fwd: Comments on DEIS on RMPs for Western Oregon BLM
To: BLM_OR RMPWO_Comments <blm_or_rmpwo_comments@blm.gov>

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From: **Bruce Campbell** [REDACTED]
Date: Fri, Aug 21, 2015 at 6:46 PM
Subject: Comments on DEIS on RMPs for Western Oregon BLM
To: BLM_OR_RMPs_WesternOregon@blm.gov, BLM_OR_RMPWO_Comments@blm.gov

August 21, 2015

Bruce Campbell

[REDACTED]

[REDACTED]

RMPs for Western Oregon

Bureau of Land Management

P.O. Box 2965

Portland, OR 97208

Re: Comments on DEIS on RMPs for Western Oregon BLM

To whom it may concern at BLM and beyond:

KEEP THE AQUATIC CONSERVATION STRATEGY and the NORTHWEST FOREST PLAN in general !

I believe that much of BLM's management in Western Oregon in recent years has been pretty good since it is generally based on the Northwest Forest Plan with its affirmative Aquatic Conservation Strategy component. One of the key drawbacks in the action alternatives is the deliberate reduction of the size of streamside buffers and allowing logging closer to streams. Seeing that many of BLM's western Oregon acres are in the O & C Lands checkerboard pattern, thus the riparian areas are especially vital not only for the movement of aquatic organisms and of terrestrial organisms in those areas, but riparian corridors are also key flight corridors for the listed bird species Marbled Murrelet (since they travel to the sea and back on a daily basis) and to an extent for the Northern Spotted Owl.

Unfortunately, the so-called NO ACTION ALTERNATIVE would carry out management schemes relating to the 1995 RMPs. These RMPs are unrealistic in terms of inflated timber yield estimates, and are not being carried out at this time. Yet, somehow it has been interpreted that

No Action Alternative for this DEIS would carry out those bogus and outdated targets. We need a more true No Action Alternative – or else just focus active management on the ¾ million acres of BLM plantations in the area.

DISCUSSION of FIRE MODELING DEFIES CONTEMPORARY LOGIC

I will quote portions of the DEIS to indicate the clear inadequacy of the worded interpretation of the fire modeling considered. Despite an increase in wildfire (and especially in the size of some wildfires since 2002), BLM appears happy to ignore climate change and worsening wildfires – except to essentially promote such conflagrations through destructive management practices.

Does BLM agree with a couple oil company scientists and with nearly all the GOP Presidential candidates that, hmm, maybe there isn't climate change after all???

Is climate change “speculative”??? Wildfires have been surging this century. BLM tries to ignore the increase in the first decade of this century by saying that two especially large-acreage fires within the planning area skewed the data – and then too early to say about the current decade seems to be their fuzzy “logic”. Page 1053 of the DEIS says: “We note that this decade is no quite half over and there have already been a recorded 67 large wildfires as of 2013. It is possible that future decades might incur more than the 100 large wildfires per decade used in this analysis; however, selection of a higher number would be speculative and the decision was made to base the analysis on what has been observed in recent decades.” WHO MADE THE DECISION TO ESSENTIALLY IGNORE WILDFIRE DATA FROM THE 21ST CENTURY??? With the rate of climate change these days, common sense is to expect change – rather than expect conditions similar to the past 50 years!

If you were an energy or water planner for a government jurisdiction, would you be basing likely demand for energy and water on the past five decades – or think things are changing enough in recent decades that a fresh look at the next five decades is necessitated?

Page 1047 of the DEIS reads: “Large wildfire occurrence records from 1970 through 2013 showed a marked increase occurrence of large wildfires in the last decade of this time record (Figure D-2). Whether this is a trend that will continue to increase is uncertain, so for purposes

of this analysis we used the decadal average of 100 to generate 500 potential large wildfires over the next 5 decades.” Hello. This is Planet Earth in 2015. Even look at your own Northwest – just how is that cooling trend doing during this heat record-breaking summer?

Page 1052 discusses the increasing wildfires in this century as so unclear of a trend that “it is not clear that this trend will continue to increase.” It appears that some related to the DEIS did detect “a” trend, but it was interpreted as not a “clear trend”. Page 1053 also says, “In the absence of any clear trends, the 50-year projection could fall within a reasonable range of what should be expected.” It was admitted that there is a trend toward more fires in the western U.S. in general, plus pages 1052-1053 mentions that “Miller et al. (2012) did find a trend of increasing number of large fires in the Klamath Mountains of northwestern California”. Seeing that the renowned center of temperate and conifer diversity is the Klamath – Siskiyou region, if there is a trend in northwestern California within that region, is it far-fetched that the trend may also take hold in the southwestern Oregon portion of the Klamath – Siskiyou range as well?

And to show how off-base some folks contending with fuels, fire, and forest management aspects of the DEIS are, note the bottom of page 1053 which appears convinced that the Northwest is in a “cool trend”. Well, you are living through the Oregon summer, not me. How is that cool summer proceeding??? Perhaps when the DEIS came out, some were not as clear that the central Pacific has entered an El Nino stage – thus not the “Pacific Decadal Oscillation” phase which is supposed to be somewhat cool. And the DEIS mentions that Hessl et al. (2004) seemed to identify a 5-year lag time between when we have a PDO phase and when there are more severe fire outbreaks. Well, the Northwest is burning now – was there even a five-week lag time as claimed above??

As I recall from the WOPR, the supposed logic was that mature forests will burn so you had better chop them down if you want any for the future. Well, the sleight-of-hand continues... It is bogus and ironic that it is those alternatives which most involved logging ancient and mature forests that will somehow magically result in more carbon storage and in more late-successional habitat.

It is admitted that certain action alternatives will spread Sudden Oak Syndrome to all trees in some infected areas. This would greatly increase the fire risk, and thus such management must not occur which would spread this disease.

Common sense would tell one that if a bird likes big trees and prefers large stands, one could more easily build large blocks of habitat by leaving the larger trees, and then work toward manipulating some trees in plantations to achieve certain mature forest habitat value in the future. The same can be said regarding storage of carbon. Not only does widespread logging negatively impact carbon storage within trees, but related active management soil disturbances are also a problem and impact the storage of carbon on the forest floor as well.

Given that more carbon is stored when one leaves ancient or mature forests standing, and seeing that various active management modes impact other areas with significant carbon storage on BLM lands, thus it is a nonsensical argument (based on faulty wildfire and other models) that one needs to engage in aggressive management of larger trees on BLM holdings in order to “store carbon” as the decades proceed. Likewise, it defies common sense to claim that aggressive management of ancient and mature trees will provide more (rather than less) late-successional forest habitat in the future.

Another place where common sense is severely lacking are the plans regarding the Marbled Murrelet. Excuse me, have there ever been successful “hibernation” or perhaps cloning of marbled murrelets? (I did not think so.) The emphasis is on Marbled Murrelet habitat fifty years from now. Well, the generations of murrelets need to survive in the meantime, so **DO NOT DESTROY THEIR PREFERRED HABITAT THROUGH DESTRUCTIVE LOGGING PRACTICES** in the meantime!!!

HOW DOES EACH ALTERNATIVE IMPACT THE MARBLED MURRELET IN THE SHORT-TERM AND THE MID-TERM ??? HOW IS THE SPECIES SUPPOSED TO SURVIVE UNTIL THERE SUPPOSEDLY IS SUFFICIENT HABITAT IN WHICH THEY CAN INHABIT 50 YEARS ON BLM LAND IN SOUTHWESTERN OREGON?

It is important to note that one purpose of “sustained yield” under the O & C Act is “protecting watersheds and regulating stream flow”. When one interferes with the “natural plumbing” beneath forests, it not only is not protecting watersheds by aggressive management activities, but it is tending to make “stream flow” more intermittent and less regular / regulated. **DO NOT IGNORE THIS VITAL ASPECT** of sustained yield under the O & C Act !!! And stop it with the unrealistically inflated numbers of board-feet that you hope to extract from each alternative!

Seeing that species for which the Northern Spotted Owl is an “indicator species” still need more ancient forest habitat to assure immediate and longer-term survival, thus this is not time to

toss out the Northwest Forest Plan. Looking back on it, the Aquatic Conservation Strategy was an especially good part of that plan – and it must not be dismembered! Despite the NFP, the state of the Northern Spotted Owl and the Marbled Murrelet in general has declined across the West. The Barred Owl is often blamed for reduction in NSO occupied territories, so let's not eliminate good or suitable habitat for these listed bird species, the Marbled Murrelet and the Northern Spotted Owl, while land management agencies consider whether they will be granted permission to remove the barred owl from certain potential or overlapping NSO territory.

A number of rare species like not only larger chunks of habitat, but some linkage between different blocks of habitat. Clearly, especially on O & C lands managed by BLM, the checkerboard pattern is such that riparian corridors are usually the primary travel corridor for aquatic, terrestrial, and even avian species between habitat blocks. Why disrupt the main corridor for species, and especially during major heat waves and regional drought, in order to accommodate frothing timber managers?!

Any sane interpretation of “sustained yield” would mean that such wood should be flowing to the mill for decades to come in similar amounts as comes off of BLM land in recent years. This cannot be accomplished. Not only are wildfires being downplayed, but one simply cannot have an ongoing flow of ancient and mature wood – without logging the ancient forest reserves and wilderness areas anyway. True “sustained yield” for Western Oregon BLM means an ongoing flow of smaller wood from plantations, and a light to moderate flow of mature wood from plantations and occasional other areas under the jurisdiction of BLM.

I call for this document to be science-based. Logging mature forests is clearly not ecologically beneficial, while it is important for wildlife to find refuge amidst harsh conditions of rapid climate change. Snags and deadwood are helpful on the landscape, and thus all ancient and the vast majority of mature forests on BLM land must be protected. Since BLM is so used to liquidation of resources, they fail to see the great opportunity for actual carbon storage and climate change mitigation – and instead propose their aggressive management schemes while making wild claims as to alleged carbon storage and alleged stand-level fire resistance over the longer-term.

I also want to call for no additional roads on Western Oregon BLM land (in fact, decommission some roads) so as not to ruin native salmon habitat due to the related sedimentation which is sure to follow. The claim that there would be a “less than 1%” difference in sedimentation rates (if there was new road-building in various areas of BLM land) was likely a claim urged by a lawyer -- rather than a claim based on ground disturbance, sedimentation, and gravity.

Forest management activities must be focused on the ¾ of a million acres of this western Oregon BLM land which are in early-seral / plantation condition. THAT is the looming fire danger that must be dealt with. I am disappointed that this Draft did not include maps of exact burn areas – but general burn areas. I bet more exact burn maps would show that BLM and other plantations burn especially hot and then, unfortunately, sometimes threaten some marginal or decent habitat for some ancient forest dependent species not too far away.

Face climate and fire reality – and inform me of the date that a Supplemental Draft EIS may come out in regards to Resource Management Plans for BLM districts in western Oregon.

Finally, an alternative should be developed that maximizes both the number of protected Areas of Environmental Concern as well as the maximum amount of Wild and Scenic River Act stream segments with “outstandingly remarkable ecological values”, and a maximum amount of parcels which have been identified as containing “wilderness characteristics.” (I am especially disturbed that some areas previously identified as such are facing renewed scrutiny by timber managers. For instance, be sure to include all of the Dakubetede and Wellington Wetlands areas as having wilderness characteristics, while providing important habitat or steppingstone temporary habitat depending upon the species.) These were all identified by BLM, yet apparently there is major pressure to eliminate some from protective considerations so that board-feet can be extracted from such sensitive areas.

Sincerely yours,

Bruce Campbell

----- Forwarded message -----

From: **RMPs_WesternOregon, BLM_OR** <blm_or_rmps_westernoregon@blm.gov>
Date: Fri, Aug 21, 2015 at 8:35 AM
Subject: Fwd: Oregon Land use comments
To: BLM_OR RMPWO_Comments <blm_or_rmpwo_comments@blm.gov>

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Bureau of Land Management**
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From: [REDACTED]
Date: Mon, Aug 17, 2015 at 4:39 PM
Subject: Oregon Land use comments
To: "BLM_OR_RMPs_WesternOregon@blm.gov"
<BLM_OR_RMPs_WesternOregon@blm.gov>

The rights of our land belong to the people.

I believe BLM should **not** manage lands for their wilderness characteristics. I believe that areas should be either designated wilderness or not. We do not need another semi-wilderness designation used as an excuse to prohibit mechanized recreation.

I would like the RMP to address partnerships between the BLM, MRA and other active OHV clubs. The MRA should be treated as not just as a way to get workers for on the ground projects, but as advisors to all OHV activities on BLM land.

Enchanted Timber Recreation Management Area (RMA) - I am in favor of alternative D and making it a motorized OHV area.

Enchanted Well RMA- I am **not** in favor of any of the alternatives or making this RMA non-motorized. There are a number of existing OHV trails in this area that are some of my favorites that I ride often, such as Little Italy, Fugawi (which connects to the Wellington Mine Road), and several other trails that form a long loop that goes through Bunny Meadows, up the Poison Oak Trail, and back to the MRA staging areas. The loss of these trails will destroy the only remaining long loop that contains mostly single track trails that I now enjoy.

Anderson Addition RMA- I am in favor of Alt D and making it an OHV area, but it should also include all BLM land to the east of Anderson Addition in sections 17, 18, 20, 21, 22, 27, 28, and 29.

Quartz Creek OHV RMA- I am in favor of Alt D and keeping it as an OHV area, but it should also include the following areas to the west with existing OHV trails in sections 5, 6, 7, 17, 18, 19, 20, 29, 30, and 31. There should also be a connection to the Forest Service Briggs Creek OHV Trail system.

Thompson-Cantrall RMA- I am in favor of Alt D and making it an OHV area with the following exceptions: Alt D says this area is for "dual Sport". I believe that the RMA should not exclude the use of the existing OHV trails, the building of new OHV trails, or the use of non-licensed OHVs.

Woodrat Mountain RMA- I am in favor of Alt D and making it an OHV area.

Coyote Creek OHV Area- I am in favor of Alt D and making it an OHV area.

Brad,
