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To Whom It May Concern:

Please accept my Scoping Comments on the proposed BLM Western Oregon Resource Management Plans. I am commenting as a private citizen located in the Medford District, Butte Falls Resource Area-Evans Creek Watershed R4W-TWP 34S-Section 26. I am a concerned downstream landowner from Section 25 which is owned by BLM in the Sykes Creek drainage. I will attempt to answer the questions received at the meeting of May 16, 2012.

I. What is the appropriate scale and scope of the plan? What would a successful plan look like?

A broad scope and scale should be recognized in the plan where all BLM lands in the state are included. The plan should consist of two parts-one dealing with moist and one dealing with dry forests. The emphasis should be on restoration of BLM lands that have been severely impacted by over cutting and road building. My comments will address mostly the Southern Oregon forests that are dry. The Franklin/Johnson model is a good beginning framework.

II. What new and innovative ideas should BLM consider in the planning process?

A. Focus on restoration of damaged watershed by:

1. Reduction of **Road Density** by decommissioning unused present roads and reducing new ones. (also addressed in Section IX)
2. Eliminate **Regeneration Cuts**-harvest from existing plantations and plant new trees that are multi species with natural spacing and openings.
3. Emphasize **Small Diameter Thinning** (cutting trees less than 20" DBH)and encourage mills that are tooled for this type of wood production in local communities.
4. Use labor from **Local Communities** to work within contract guidelines overseen by a contract administrator that will stay within those guidelines. This would continue the idea of the Stewardship contract with emphasis on local labor and stricter oversight. Local co-ops with forest restoration experience should be allowed to bid on these contracts.

B. Watershed Analysis

Watershed Analysis is an excellent tool for us to determine the baseline condition of the watershed. Most of these were completed in the 90s and need to be updated. What is the condition of the watershed now compared with when they were written. Future NEPA documents should address current as well as historical problems.

C. NEPA Documents

NEPA Documents should use language that is easy to understand and terminology that is well defined.

D. Allowable Cut

BLM management is driven by timber targets that are based on financial income requirements rather than what is best for forest health and resiliency. Despite this, many timber sales are below cost meaning the tax payer picks up the tab. The present condition of our forests in Southern Oregon mandates a relaxation of these targets until these forests regain historic vigor and resiliency. This is a long term goal that may not pay off until the future. However, future generations will thank us if we consider them now.

E. Soils

Soils are a critical resource on Southern Oregon lands. Many areas contain fragile soils prone to erosion or clay soils that solidify when wet and become management problems. Many soil types are good for growing trees. Others should not be disturbed because the problems that result could preclude or increase the difficulty of future restoration work. Soils reports are usually part of NEPA documents but management has not always followed the recommendations in those reports. Logging on TPCC fragile soils should be prohibited.

F. Cumulative Effects

Cumulative Effects are often discussed in the NEPA documents but are often not considered when planning actual projects. Part of a section of land may be cut one year in a sale and the next sale the rest of the section will be cut. Hence, a number of sales are contiguous and the detrimental effect on the landscape (fish, wildlife and streams) in that area of the forest is enhanced even though the sales take place over time.

G. Monitoring

Even though all management departments should have a monitoring component, this often seems to get lost in the planning process for the future. Monitoring should be comprehensive with necessary changes implemented in following years. Strict standards and guidelines should be established as part of the plan. Records should be kept on the ground concerning the actual condition of the land and how improvements could be made. The future condition of the land should be part of any planning process.

III. What should be the approximate mix of, old, middle aged and young forests be on BLM lands?

Tree size as well as age should be a factor in vegetation management. Larger trees should take priority. Older, large trees are deficient in the BLM landscape-only about 18% Old Growth now exist on BLM lands at present. These are legacy forests and should be set aside. Mature forests should also be retained to make up for the old growth deficiency. Therefore only younger trees that are less than 20" DBH should be cut. The majority of the timber base should come from these. Hopefully regeneration cuts will be replaced with selective cutting and mixed species will be planted in bunched patterns with some small open spaces. Small hardwoods and brush in dense areas could be replaced with mixed conifer species. Large hardwoods(over 20" DBH) should be retained. Hardwoods and Pine species should be encouraged along roadsides to buffer the internal landscape.

IV. How can BLM be most effective in providing habitat for fish and wildlife and in recovering ESA listed species?

A. Fish

Many if not most of the streams in the Butte Falls RA are water quality limited. The fecal contamination and temperature is high, while the dissolved oxygen is low. In the entire Klamath-Siskiyou region, Coho Salmon are going extinct

1. Limit suction dredge mining by developing regulations that minimize impacts on Coho. Consider closed areas and spawning seasons.
2. Limit logging activities in Riparian areas. Some streams will need full buffers. Yarding corridors in Riparian areas should be prohibited. Retain large trees by streams. Shade is critical.
3. Logging roads are a major contributor to stream pollution and degradation of water quality. Consider a reduction of roads in critical watersheds. Logging road pollution should be regulated under the Clean Water Act.

B. Wildlife/ESA species other than fish

1. Some species such as the Fisher are very rare in Southern Oregon. BLM has created timber sales in areas where the existence of these animals is documented. When ESA or threatened species are known to exist, defer these watersheds until it has been proven that they are no longer present.
2. Absolutely there should be no disturbance in 100 acre spotted owl cores or connectivity blocks(which are often labeled and ignored). The agency has been encroaching on protected areas to harvest larger trees. Spotted Owl populations have been declining in recent years.
3. Small buffers around ESA plants and Red Tree Vole trees are not enough when the entire ecosystem has changed around them. A reasonably large protected area should be established-at least 2 or three acres.

4. Neotropical birds are in decline in Southern Oregon. Much of this is caused by loss of southern habitat. However it is all the more critical that we work to save what is here. Management activities should be decreased or stopped during nesting season.

V. How should BLM manage forests to protect property and ensure our forests are fire resilient?

Fire is part of the natural cycle of ecosystem phenomena in Southern Oregon. These forests have adapted to fire over thousands of years. Some plants remain dormant and resprout only after a major fire event. Fire suppression has resulted in the buildup of the fuel base, therefore creating conditions for large stand replacement fires rather than slow underburns.

There is a consensus in the scientific literature dealing with fire and forest management that forests in unroaded, unlogged areas are the least altered from historic fire regimes and have the greatest ecological integrity and the most fire resiliency. They present a lower fire risk compared to areas altered by past intensive management. (DellaSala et al-2000) These areas have fewer loads of small diameter, highly flammable surface and ladder fuels and are not highly roaded and subject to human caused ignitions.

Scientific analysis of the 2000 fire season revealed the vast majority of burned areas were located in previously logged and roaded areas. Commercial logging removes the ecologically valuable fire resistant trees and leaves the highly flammable logging slash.

Management Suggestions:

- A. Protect and encourage large trees and old growth to naturally build up forest moisture components and thus reduce fire risk.
- B. Eliminate large regeneration cuts and clear cuts with single species plantations that create fire risks and are deficient in large down woody material.
- C. Leave any remaining roadless areas intact.
- D. Prohibit salvage logging after stand replacement fires. Let the land regenerate naturally (Beschta et al-1995) and eventually plant mixed species in patched mosaic patterns.
- E. Thinning
Thinning of late successional forests can create fire risk. Thinning is appropriate:
 1. In dense single species, single story plantations
 2. In dry older forests-thin smaller trees and leave large ones
 3. Where fire suppression and past logging have altered the landscapeIn all cases, the integrity of the landscape should be preserved.
- F. Encourage fuels treatments along roads with species such as hardwoods and Pine.
- G. Encourage fuels reduction in the Wildland/Urban interface
- H. Separate contracts for fuels reduction projects from timber sale contracts

- I. Reduce livestock grazing in forests and encourage native grasses and plants that compete with encroaching trees on meadows
- J. Retain key wildlife features such as snags and large logs
- K. Encourage low intensity frequent fires to avoid stand replacement ones. BLM usually does spring controlled burning . Burning during this season threatens nesting birds, reptiles and other wildlife. Late fall would seem the appropriate time to burn.

VI. How should BLM administered lands be managed to contribute to clean water and safe drinking water?

- A. Respect stream buffers as outlined in the NWFP S& Gs for streams.
- B. Coho Extinction Threat
Coho are still under extinction threat because current populations are very small and retention of genetic diversity is questionable. Many NMFS recommendations could be implemented in BLM guidelines.(draft Threatened Recovery Plan for Fish-NMFS)
 - 1. increase stream flows
 - 2. better regulations for Suction Dredge Mining(see previous comments under IV)
 - 3. specific criteria and standards for habitat protections
- C. Pollution Controls
As stated in IV there are a great number of water quality limited streams on BLM land in Southern Oregon. Some of the reasons for this are:
 - 1. discharges that create fecal contamination from humans, cattle and dogs. This effects fish habitat as well as human drinking water.
 - 2. Other problems with these streams include high temperatures and reduced dissolved O2 that directly effect Salmon.
- B. Removal of old unused dams will increase stream flow
- C. Grazing is a major contribution to stream pollution. Cattle also break down stream banks adding to the degradation of the creeks.
- D. Watershed Analyses have shown the historical evidence for stream problems. They are a good baseline and should be updated with current information.
- E. Logging roads can threaten the integrity of streams-adding to sediment and reducing water quality of public drinking water supplies and salmon habitat .

Question IV actually could be part of this question as many of the same problems effect humans, fish and wildlife.

VII. What types of recreation opportunities should there be more or less of on BLM lands?

- A. Limit motorized recreation in sensitive areas such as fragile meadows, riparian areas, and back country wildlands. We have enough OHV sacrifice zones. There must be a way to provide suitable trails and roads for OHV traffic that doesn't tear up sensitive areas. I realize that the agency has had trouble dealing with this issue and there is limited funding and personnel to properly enforce rules to protect these areas. This comment is a message to BLM that there are other values besides that of motorized vehicle recreation. Once an area is used for this it is useless for other values such as hiking, fishing, camping and appreciating the quiet of the outdoor environment. River rafting is also a major recreation activity on Southern Oregon public lands. BLM could coordinate with the FS to come up with ways to protect wild and scenic sensitive areas so they can be enjoyed by the majority of the people who would like to use them.

Because of BLMs checkerboard ownership noise, pollution and damage can be experienced by adjacent private landowners who value quiet, clean water and privacy.

VIII. How can BLM lands contribute to local economies and support local communities?

- A. Decrease dependence on timber targets and work with local communities to restore damaged forests and riparian areas. Hire local people and co-ops to do forest restoration work.
- B. Small Diameter Thinning.
Harvest from plantations and thin younger forests-trees <20" DBH. Support local mills that will handle this type of material. County payments should not depend on the destruction of what is left of BLM forests.

IX. How does road density effect forest health?(my added question)

I have chosen this extra topic to discuss because I believe it to be one of the major forest health issues. This is a significant problem on all public lands(BLM and FS). Not only do roads cause stream sediment and pollution, they compact soils and contribute to raveling and erosion. Each road can turn into a stream bed during heavy rains which in turn contribute to changes in stream channels and movement of soils from uplands where they are needed, to creeks and rivers where they are a detriment. Set aside funding to decommission as many roads as possible and build as few new ones as possible. Try to save as many roadless areas as are left even if they are only 1 section.

X. Proposed transfer of most BLM lands in Southern Oregon to FS or private management-DeFazio et al

This is a giant give a way to the timber industry. Under this bill very few BLM lands in Southern Oregon would go to the FS. Most would be managed to have maximum timber production ie clearcuts and herbicide spraying. This would mean the death of what is left of these forests plus added pollution of air and water for down stream landowners. There would be no stream buffers that would adversely effect already stressed Coho populations. When the trees are gone, regardless of new plantations, we will still be facing a county payments problem because we have chosen a short term solution to what is an ongoing long term demand for funding.

XI. What do you like about BLM management of public lands? What would you like to see more of?

- A. Access to local personnel in the Medford district has been excellent from the time I started communicating with the BLM in 1983. There has been continuous improvement of this access since that time. They have gone out of their way to find information for me and expand my knowledge. Jean Williams Butte Falls RA Environmental Coordinator has been especially helpful. She is never too busy to find information or answer questions. Agency people have helped guide me through the NEPA process so that my comments could be more relevant even though they know that I disagree with many of their management decisions.
- B. Reports from experts in various departments such as Soils, Wildlife and Botany are generally well written and have a positive direction. I would like to see more value placed on these reports and less on timber harvest by upper decision makers.
- C. Maps have significantly improved over the years with well delineated areas for different management activities. Sometimes the color codes could be more diverse and easier to read.
- D. What would you like to see more of?
I like the tone of the presentation of the recent BLM Medford District Scoping meeting in May. I liked the idea that the questions for these comments covered a variety of topics and emphasized forest restoration. I would like to see more acceptance and implementation of ideas moving in this direction. The future condition of the land must always be considered if we are to move into truly sustainable forest practices.

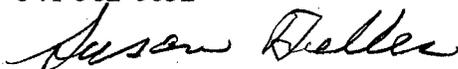
XII, What do you not like about BLM management on public lands? What would you like to see less of?

BLM management has improved over the years and is generally moving in the right direction. There is a tendency of the agency to over manage-to do too much-over cutting large trees, entry into Riparian areas, too many roads etc. I would like to see less of this direction and more attention given to forest restoration as mentioned in the beginning of these comments.

- A. Emphasis on timber targets rather than forest health leads to:
 - 1. over cutting of large trees
 - 2. entry into watersheds that have been deferred before they have had a chance to recover
- B. Over management- cutting too much in areas that need a very light touch. Final Canopy Closures on thinning projects are usually 25-40%. Even though these entries are supposed to last over extended periods of time, this is not enough. Final Canopy Closures should be 50-70% depending on the landscape.
- C. Riparian Thinning needs a very light touch if any. No skid trails should be in Riparian areas. No large trees should be taken out. Shaded streams should be the goal.
- D. Grazing-reduce or eliminate grazing on public lands. At a minimum, cattle should be kept out of and away from streams. Subsidized grazing should end. This is money the agency could use for other things.
- E. Lack of oversight on contract administration
- F. Road density has been addressed in other parts of these comments.
- G. Regeneration Cuts are not good for forest health and should be eliminated
- H. Cumulative Effects-management ignores this(addressed in question II)
- I. Desired Future Condition of the land not usually addressed in NEPA comments
- J. Lower level "rubber stamp" FONSI decisions. Community alternatives and individual comments are for the most part, ignored at the EA lower level. If these were examined more closely at this level for changes that could be made, money might be saved on appeals and lawsuits later in the process.

This concludes my scoping comments. Thank you for your consideration.

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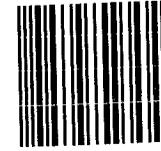




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