

Comments on BLM Western Oregon Plan Revisions (WOPR)  
Jan. 5, 2008

I feel that all of the “action alternatives” proposed under BLM’s Western Oregon Plan Revisions would be an ecological disaster for Oregon. They would drastically increase fire risk and severity, threaten the survival of the Northern Spotted Owl and other endangered species, create massive habitat fragmentation, and severely degrade riparian zones and streams. I support the science-based, ecological management approach of the Northwest Forest Plan (the WOPR’s “No Action Alternative”), and reject the contention that this is incompatible with the O&C Act.

My wife and I have been backpacking for 28 years. We have much difficulty finding sizeable areas that provide solitude away from motorized roads and trails or clanging cow bells on 50 to 100 cows. Wildlife experiences the same, but life threatening, pressures. It is difficult to find sizeable areas to explore backcountry that has not been logged, or worse clear-cut. It is difficult to find sizeable areas that have not experienced heavy wildfire, due to the lack of large fire resistant trees.

In the WOPR document BLM acknowledges that it’s own preferred Alternative 2 is the very worst in terms of fire. BLM’s own analyses show the best fire future would result from a continuation of present management, which would produce the most decrease in fire hazard and severity, reducing the acres of high severity fire when wildfires occur and fire hazard to less than half of the current condition in 100 years. In the Medford District alone, Alternative 2 would result in approximately 200,000 more acres in the high fire severity category than the present management.

As for the ability of a forest to survive a wildfire, i.e. fire resiliency, the BLM preferred alternative, again, offers the worst fire future. Stated in your document “Alternative 2 would have the greatest reduction in fire resiliency by creating the largest number of acres of forest without such green tree structural legacies combined with high crown fire hazard. This clear-cutting proposal would produce even-aged plantations without any standing large trees. Forests that Alternative 2 would create are the worst in every fire category: high fire severity, high fire hazard and low fire resiliency. The preferred alternative would leave us with less than a third of the fire-resilient forests in the Medford District than we’d have if we kept our current management, or well over half a million more acres without the ability to survive wildfire.

Uncontrolled, stand-replacing fire can destroy in a day both the economic and ecological value that took centuries to develop. To propose to drastically and permanently increase the risk of wildfire to our forests and to the lives and properties of the intermingled private property and homes is totally irresponsible. I urge you to reject any alternative that relies on clear-cutting since the resulting plantations will increase fire hazard for decades. Logging should always leave mature, healthy trees standing, protect mature and old-growth forests and focus management on thinning already existing plantations. The citizens of southern Oregon will not accept any change in forest management that

increases our risk of wildfire. And this EIS doesn't even acknowledge the detrimental effects of the proposals on dealing with global warming or adverse economic impacts from fire fighting and recovery, or loss of tourist dollars resulting from a ravaged landscape!

Along with the increased wildfire threat, widespread clear-cutting would reduce property values and subject to erosion and landslides the thousands of Oregonians living near BLM lands. We do not want to return to the unsightly and ecosystem destroying practice of hundreds of thousands of acres in clear-cuts. This is a shortsighted and unsustainable proposal. Short-term economic boom to a few mill owners will lead to an economic bust with the dwindling of fish, wildlife and old growth forests, while leading to an increase in noxious, invasive weeds.

I am very opposed to expanding OHV territory. It is near impossible to find solitude now and the adverse impacts on wildlife and the ecosystem need to be carefully monitored. There are inadequate personnel for control presently, much less increasing the practice.

I oppose clear-cutting and reduction of streamside buffers that keep sediment from the water and shade streams for salmon and other native fish. Oregon is dependent on drinking water that originates on BLM lands.

BLM must not cut our remaining older forests. No matter what type of life is endangered, the culprit is usually loss of habitat. The Northern Spotted Owl and Marbled Murrelet are dependent on what little ancient forests remain on our planet. To eliminate protection for old-growth forests violates the Endangered Species and Clean Water Acts.

I urge the BLM to protect what is left of Oregon's old growth heritage forests, and restore those forests that have been degraded. Thinning small trees on plantations that have been clear-cut by BLM in the past century and converted to overstocked tree plantations, could offer more than 2 billion board feet of commercially valuable timber if actively thinned, while preserving our last, best public lands for generations to come and reducing the wildfire danger to lives, forests, wildlife and private property

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January 1, 2008