

BLM, Western Oregon Plan Revisions  
P.O. Box 2965  
Portland, OR 97208

Re: BLM Western Oregon Plan Revisions

Dear BLM,

I am concerned with various aspects of the proposed changes to the Northwest Forest Plan under the Western Oregon Plan Revisions. It is a step backwards in forest management to reduce the riparian zones because removing more trees will allow the water temperature of streams to increase and negatively affect fish. The accompanying increase in sediment run-off will adversely affect water quality.

With the number of acres within the management area that need thinning to increase stand vigor, it is wrong to focus on harvesting old growth to create an unsustainable economic windfall to the counties. Since nearly 85% of old growth forests in the Pacific Northwest have already been logged, we need to protect what is little is left to benefit our air and water quality and to serve as classrooms for studying natural forest ecosystems.

Besides utilizing trees that need to be thinned for the future health of the forests, there is a critical need to reduce fuel loads to help prevent catastrophic wildfires. Because of fire exclusion, lack of thinning, and focusing on the harvest of larger more fire-resilient trees, 50% of southern Oregon's dry Douglas fir forests would burn at a high severity level, compared to a 20% historical level. This fire danger level needs to be addressed and action taken to diminish it. Increasing the harvest of moist old growth forests and replacing them with more flammable tree plantations is not the answer.

Please protect our precious remaining ancient forests, focus resources on areas that have already been logged over, and support the local economy through restoration thinning projects.

As a resident of Ferris Gulch, I am against the proposed OHV designation for many reasons. The main road through Ferris Gulch and into Panther Gulch, 38-4-17, is well-traveled. I am worried about safety of OHV and highway vehicles both operating on the main road, which is narrow with many blind

curves. The gulch is also used by horseback riders and mountain bikers and an increase in OHV use will cause safety issues with those activities. Ferris Gulch has long been a popular hunting area and having OHVs and hunters in the same location could be a potentially dangerous conflicting use.

Historically, OHV use in the gulch has resulted in rutted areas which have deteriorated with erosion. Large boulders were hauled in to block one badly damaged area on the main road, at the intersection of 38-4-20, and signs were posted to close the area. The result there has been mostly successful, but the OHVs have just moved on to other areas. There are numerous new trails in the gulch made by OHVs to create off-road and hill climbing routes. These will become further degraded with erosion during the rainy season.

Noise is another issue in Ferris Gulch. It is not a very wide valley and sound travels here amazingly well. Whether or not the OHVs that use the area meet the decibel requirement for mufflers, and I feel certain some of them don't, OHV noise greatly lessens the quality of life for Ferris Gulch residents.

At a public meeting this fall, I noticed a BLM map that shows Ferris Gulch is at extreme fire risk. The residents of the gulch have participated in fuels reduction on our private lands through Applegate Valley Fire District No. 9. However, the BLM lands surrounding us are visibly full of dead trees and the overly dense stands need to be thinned. While lightning is the primary cause of wildfire ignitions within the planning area, the secondary cause is humans. With a proposed increase in OHV use, what will be done to mitigate the extreme fire risk? Are thinning operations in the plans for this area? Would the area be closed to OHV use during fire season?

In the 2002 Amended Environmental Assessment for the Ferris Bugman Project, special status plant and wildlife species were identified in Ferris Gulch, including *Clarkia heterandra*, *Cypripedium fasciculatum*, *Bryoria tortuosa*, Siskiyou mountains salamander and Townsend's big-eared bats. Ferris Gulch is also part of a wildlife winter range and there is evidence of elk moving into the area. An increase in OHV use would endanger both special status plants and wildlife. Would there be safeguards in place to protect them? Would increased noise and traffic negatively impact the maternity bat colonies? Would OHV use would cause loss of forage habitat and cover for elk and create negative effects during calving periods? Have there been any studies to determine acceptable levels of disturbance?

Invasive plants, such as star thistle and bull thistle, are present in Ferris Gulch and an increase in OHV use will cause soil disturbance opening the way for an increase in the spread of these invasive plants. Does the BLM have resources to help contain these invasive plants?

Based on my concern for public safety, fire danger, resource degradation, and negative plant and animal impact, I urge the BLM not to designate Ferris Gulch an OHV emphasis area.

Sincerely,

Jeri Gleiter  
16860 Hwy 238, Grants Pass, OR 97527

Please withhold my name and address from any request for information.