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JACKSON COUNTY
Oregon

Board of Commissioners

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Sirs:

At the onset, I must emphasize that the following comments do not represent a consensus of the Jackson County Board of Commissioners. They do, however, represent the opinion of the Commissioner who has historically been the most sympathetic to both the local environmental community and to the non-industrial private landowners who own properties within and adjacent to the proposed John's Peak OHV area.

From my perspective, Alternative 2 has several "fatal flaws" that could provoke litigation that would delay implementation until well into the next Administration. These include the following:

1) OFF HIGHWAY VEHICLE (OHV) AREAS: Although BLM officials have stated that they are working on Alternatives for John's Peak OHV area, the WOPR DEIS seems to set into stone the most extreme scenario. The "preferred" Alterative 2 sets aside 16,375 acres. (page 143)

   The WOPR DEIS states clearly that "Alternative 2 would result in a loss of non-motorized recreation opportunities in the Medford District due to the larger portion of land that would be designated specifically for motorized use (12% of the district's total land base)...visitors seeking non-motorized forms of recreation would be dissuaded from using these areas." (page 778)

   Because of the "checkerboard" delineation of Federal "O&C" lands on John's Peak, a significant portion of lands within this designated area are privately owned. A significant percentage of those who own non-industrial private lands within this area have signed petitions opposing the OHV area.

   Since I am sympathetic to the strongly held concerns of private property owners within the John's Peak OHV area and its surrounds, I could not support an Alternative that seems to "set into stone" a 16,000+ OHV park, even if less extreme proposals were later brought forward.

2) FUEL REDUCTION AND WILDFIRE RISK: This one surprised me. It would appear that Alternative 2 actually increases long-term fire risk even more than the present management practices that most would agree are woefully inadequate. (Figure 273, page 769: look at "high severity acres Medford" for the year 2116.) Alternative 2 promotes the development "of even-aged plantations, which would be highly susceptible to stand-replacing crown fires. This would maintain or increase the crown fire hazard in the South." (page 770)

3) POTENTIAL WILDERNESS: The acreage within the Medford District dedicated to wilderness management is only 17,759 acres (page 219), only 1384 acres more than the proposed John's Peak OHV reserve. An omission that could very well doom Alternative 2 is the exclusion of the "Wild Rogue Wilderness" that is considered by many to be the largest roadless area in the entire WOPR planning area. It is not even listed in "lands with wilderness characteristics" on table 125, Medford District. (page 418)

   Even if it were to be designated "wilderness," "the special management to maintain wilderness characteristics would not apply to portions of these units that occur on O&C lands suitable for permanent timber production." (page 784)

   Since the area has developed nationwide recognition among mainstream environmental organizations, its omission could easily set off litigation that would delay implementation until long after we have another Administration in Washington.

4) RIPARIAN MANAGEMENT: The "riparian management area" is also an area of significant concern, from both members of the environmental community and anglers. The "stream bank zone" is only 25 feet. Within this zone, harvesting would be allowed for "operational reasons." (page 79, table 31) What are "operational reasons?" Could a caterpillar tractor tear up riparian habitat just to get to the other side for "operational reasons?" If turbidity is increased for "operational reasons," is the Clean Water Act violated? Does removal of up to 20% of effective shade from 25 to 60 feet and 50% of canopy from 60 to 100 feet impact water temperature?

5) REJUVENATION HARVESTING: Clear cutting has been reborn as "rejuvenation harvesting." Alternative 2 would allow 143,400 acres to be clear-cut per decade (14,340 acres or 22.4 square miles per year). (page 581) Although clear cutting is certainly more profitable in the short term than less invasive forestry techniques, it is no longer supported by the majority of American citizens, especially in the Northeast and upper Midwest, regions that still have significant political clout in Congress.

6) NORTHERN SPOTTED OWL: Alternative 2 allows clear cutting areas previously reserved as spotted owl habitat. It is not clear what the impact would be. This is another area where change in policy without a clear sense of impact will result in litigation that could delay implementation well into another Administration.

Although my comments may seem quite negative, I still believe that a compromise is still possible that could move the process forward.

Before such a compromise can be reached that can move us beyond stalemate, several important questions must be answered.

From the environmental community: What are the specific boundaries of lands that should be preserved for wilderness areas and preservation of vital habitat? How many acres would that entail?

From the timber industry: How many annual board feet must be harvested yearly from Federal lands to maintain local production and local jobs? How many acres would be required to ensure "sustainability" of production within the confines of plantation management? Is there a local capacity for processing large diameter logs, or will these logs be sent out of region or even overseas? Does such harvesting really require incursion into "roadless" areas or areas that have "wilderness potential?"

From the O&C Counties: What is "bottom line" additional income required to sustain County operations, and to provide services such as road and sheriff patrols within the historic checkerboard of O&C lands? How many acres and what are the boundaries of "interface" areas that need special treatment to reduce fire risk?

Jackson County may be one of the few that are poised to move into the "post-O&C" era. We have already made the painful cuts needed to move ahead without Federal moneys. If we get no further O&C moneys, we will survive, even though our resources will be stretched very thin by the need to provide services across the vast checkerboard of Federal lands.

Even though our county's fiscal survival is not threatened, the fragile societal threads that hold us together could soon be unraveled if a solution is not found that could provide both sustainability of jobs and critical habitat. The threads have already been pulled too close to the breaking point by recent demographic changes.

Small remote timber-dependant communities have slid into endemic poverty and hopelessness, with the loss of family wage jobs and an aging, poorly-educated workforce that is poorly equipped to move into post-timber economy.

Larger communities have experienced a flood of immigrants from California and elsewhere who have significantly higher educational attainment and economic resources, who value the non-economic resources of Federal lands.

Although the values cherished by each group are different, they need not be mutually exclusive. A well thought-out compromise that produces a new "Alternative" is still possible, but not within the Alternatives that have been proposed by the WOPR DEIS.

Sincerely,

David R. Gilmour, MD
Jackson County, Oregon Commissioner