

November 12, 2007  
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Grants Pass, OR 975

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Bureau of Land Management  
Oregon State Office  
Western Oregon Plan Revisions  
P.O. Box 2965  
Portland, OR 97208

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RE: 1610(OR-930)  
Alternative 2

Below are my comments on the draft EIS to revise RMPs for the Western Oregon BLM Districts.

In the cover letter it is stated "...please recognize BLM's obligation to meet the laws and regulations that we have to follow."

It would seem to me that if the matter of action brought by the timber industry in federal court, disputing the validity of the Northwest Forest Plan, had been permitted to take its course through the judicial system, that above referenced statement would have greater merit. But, since the federal government chose to settle with the plaintiff out of court, it is unclear to me that BLM has no need to heed laws that were in initial court action.

As to the retrograde approach to timber harvesting with little thought to saving old growth and its habitat, when it is estimated there is only 18% to 20% left, an ecological disaster would appear to be the end result of the law as now interpreted.

Clear-cut logging, or its euphemism, regeneration cut, should there even be vigorous restocking, only means fire prone tree plantations. However, BLM obviously gave the issue some thought. The cover letter gives examples of comments that would be "useful?" "How to speed the redevelopment of structurally complex forests after regeneration timber harvesting."

You plan to log old growth, restock it with even age trees, and basically ask the public: what does BLM do next to develop growth patterns that will create old growth forest? And, in a hurry, no less.

To cut as many trees as possible, buffers at streamsides will be markedly reduced undoubtedly causing more erosion, and higher water temperatures that will further impact fish populations. Of course, all flora and fauna relying on old growth habitat will be affected. Plus the hundreds of miles of additional logging roads will disrupt wildlife connectivity areas, as well as cause erosion and sedimentation issues.

All of this for short term economic gain by timber companies and provide local economies a return to boom and bust cycles of earlier decades.

For BLM to embark on an effort that will intentionally expunge much of what is left of old growth trees and habitat under its jurisdiction, which were extant before the nation's westward

expansion, is to desecrate a viable portion of the natural world and its priceless components.

If learned professionals in forest ecology, such as Jerry Franklin Dave Perry, James Agee, Cindy Deacon Williams, and Dominic Della Sala, can be ignored as to their expertise, there seems little hope for enlightenment to change BLM's course. And what may then follow will be numerous lawsuits to stop an ecological armed-don.

The recreational plan for OHVs, under Alternative 2, seems to indicate a correlative component in BLM's expectations for OHV use by the end of the decade (2016); possibly related to the presumption of less old growth getting in the way of the off-roader's entertainment. (See Vol. I, pgs 413-415).

Referring back to the Medford District's RMP for 1995, one finds 25,570 acres identified for decadal planning for OHVs: Ferris Gulch, Timber Mountain/John's Peak, and Quartz Creek: 11 years later none of the three has become a formal, approved recreational OHV site.

However, that has not precluded use of these sites by OHVs. In connection with the Timber Mountain/John's Peak locale, the Medford District recently put 1700 acres off limits to off-road use, because of severe erosion, trail rutting, and sedimentation problems. It does not guarantee no OHV use, if one can judge from earlier experience, plus the fact that the district has only two enforcement officers to oversee 866,278 acres.

Under the WOPR, it, at least the Medford District, seems to be waving a red flag in the public's face, as Alternative 2 calls for the potential of 13 sites in said district, with more than 100,000 acres under consideration, while 4 other districts are identifying only one site per district, with acreage of 31,319.

I doubt a large majority of residents within the Medford District would be pleased with the prospect of 10 additional sites to the 3 still dangling from the 1995 RMP proposal.

The rationale for the 13 OHV Emphasis Areas in the Medford District is that it would "likely cause reduction in dispersal of off-highway vehicle use on other Medford District BLM lands... because riders would be attracted to greater opportunities within these developed emphasis areas." (Volume II, pg. 778)

Surely, the writer jests. The subject is off-road vehicles. The individuals who enjoy this mechanized sport are prone to making their own trails in order to expand any system of formal trails. It is why the as yet not formally approved Timber Mountain/John's Peak acreage extends beyond its envisioned boundaries to ridge line tracks into Josephine County, on to private lands and BLM closed riparian locales. One of the latter is in a watershed where I live.

The riparian area has been misused by OHVs for a number of years. The location has been identified as an active Spotted owl activity center since at least 1994; the area has a threatened orchid species; and is a wildlife connectivity corridor. BLM signs prohibiting OHV use are frequently destroyed or removed, while one trail entry for hikers had barbed wire fencing torn down through which OHVs gained entrance. It took more than 2 years for the fencing to be replaced, although frequent reports of OHV damage and entry into the area were reported.

Of all the many articles and reports I have read regarding OHV activities, I have never come across one that extolls ongoing responsible use of any area on public lands. Basically, such locales should be classified as sacrificed landholdings, and be as far away from residential use as possible. If the premise that OHVs belong on public lands is considered valid, one only has to think of the military Humvee and its civilian counterpart, the Hummer, and wonder if it should be permitted OHV status. Except, that in the state of Oregon, Hummers can receive a Class II OHV permit.)

I am enclosing a number of articles on the difficulties in public land management of OHV use to highlight my comments. But I will address one location that has a formidable reputation: The Imperial Dunes in SE California.

The 40,000 plus acres on BLM land is for the use of OHVs. Over 100,000 riders congregate there, especially on 3 day holiday periods. Law enforcement, which is present at such times, stays on its perimeter because they have been subject to attack if entering into the "recreation " area.

Homicides, mayhem, drunkenness, intentional destruction of OHVs by fire, all have occurred there, and more.

The solution to these problems offered to BLM by some off-roaders: give them the same access to another 40,000 plus acres of the dunes that were closed to OHVs! At last report, the area remains closed.

If off-roaders are highly visible on open terrain, such as the dunes, will ignore guidelines or limits on use, why would one expect those using forested areas (while they still exist) would be less likely to misuse the land, when their activities are less open to observation? Even law enforcement would be less of a deterrent because of the visually obstructive terrain.

Another issue is the involvement of the general public with BLM, while planning proceeds on the OHV Emphasis Areas, as addressed in Volume III pgs J 1205-1206, Interim OHV Management Guidelines, and specifically applied to the Medford District. Under the heading, on pg. 1206, "Process for on-going collaboration and outreach", it states "The principle venue for public collaboration within these emphasis areas is through partnership relationships with local motorcycle and 4X4 associations."

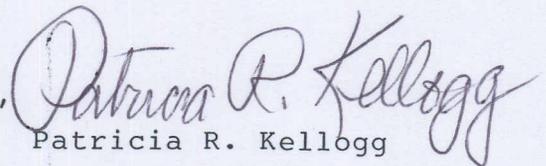
This gives confirmation to what many residents in the Medford District see as a strong bias in favor of the off-roaders' wishes as to use of public lands. It would be interesting to learn what members of the public were participants in selecting the OHV Emphasis Areas for potential recreation sites.

It seems BLM did not invite any public input on a different issue, one that could have many impacts on the entire region, global warming. And, the only comments I located were under Environmental Consequences, Volume II, pg. 491.

Therein it is stated "The analysis assumes no change in climate conditions because the specific nature of regional climate change over the next decade remains speculative."

I have enclosed articles regarding this issue as it relates to such "speculation."

Very truly yours,

  
Patricia R. Kellogg

Attachments:

News & Opinion Logging articles

About Face  
New Battle-Logging vs spotted owl  
BPL plan no help to timber cos  
Bush points BLM in wrong direction  
BLM-Pressed to log  
A Whopper of a Wopr  
Admstrn spotted owl plan panned  
BLM still ignores thinning  
Money doesn't grow on trees

News & Opinion OHV articles

Land sacrifice in the Applegate  
Destroying Nat'l parks  
Cut illegal path in forest  
Hell on wheels  
Rangers take on urban woes  
Off road rampage  
Off-roaders swamp dunes  
Off-roaders chew up public land  
Off-roaders trash mountain marsh  
OHVs harm public lands  
Home owner impact of BLM OHV Emphasis Areas

News Articles on Climate Change

Climate change dies on funding vine  
GAO claims USFS/BLM fail to react on  
warming  
Scientists tie upsurge in forest fires  
to climate change

CC: Sen. Ron Wyden  
Sen. Gordon Smith  
Rep. Greg Walden  
Rep. David Wu  
Rep. Earl Blumenhauer  
Rep. Peter DeFazio  
Rep. Darlene Hooley  
Secretary of Interior, Dirk Kempthorne  
Timothy R. Reuwsaat, District Mgr, BLM,  
Medford District  
Gov. Theodore Kulongoski