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Public Comments
BLM Western Oregon Plan Revisions
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Upon reviewing the Draft Environmental Impact Statement a number of questions arise. My particular concerns center around the environmental consequences of the proposed "action alternatives."

There is, for example, frequent mention of "Stand Establishment Forests". Can this term also be used to describe "regenerative harvests or clear cutting"? Doesn't this management style lead to monoculture plantations—the condition considered to be most fire prone?

What the draft EIS terms "structurally complex stands" are large older growth trees and *sound snags* which act as heat sinks; taking the heat and intensity out of fire, as they contain immense amounts of moisture. The deep duff occurring in these forests also aids in slowing fires. Removing the most fire resistant older trees (high grading) brings additional light into the forest floor; increasing brush, therefore adding to the fuel load.

As big trees are vital to forest health, I suggest looking at successful examples like the Boaz and Siuslaw Forests projects. These are models of thinning designed to achieve better utilization through cutting smaller diameter logs. BLM plantations could offer more than 2 billion board feet of commercially valuable timber over the next two decades if actively thinned. Investment in Oregon mills that process logs smaller than 9 inches in diameter doubled from 1994 to 2003, making the proposition feasible. It makes sense to focus on less ecologically valuable stands.

According to a 2002 BLM NW Forest Plan Report "recent studies show sound scientific basis for proceeding with thinning of young stands in order to enhance and accelerate forest stands more towards old-growth characteristics." In the same 2002 Report it says the BLM aims, among other things, toward "soil productivity improvement, improvements in forest ecosystem health, watershed restoration and maintenance, and improvement of wildlife and fish habitat, control of noxious and exotic weeds, and the reestablishment of native species"—laudable goals that clearly don't mesh with the proposed Action Alternatives.

In my role as citizen advisor for Lane County Vegetative Management we discuss at length how to deal with the introduction and spread of invasive plants. I am concerned that Alternatives 2 & 3 in particular would intensify this problem. How does the Bureau intend to deal with post-harvest containment of exotic and invasive plants? Would this parallel Lane County's "last resort" policy guidelines on herbicide use? How does the Bureau intend to protect neighboring farms and residences from drift of herbicide spray and plant defoliant, as well as groundwater contamination?

Under Alternatives 2 & 3 there is some reference to increased road building but no mention of how to mitigate likely increases of sediment delivery to fish bearing streams due to road building as well as soil disturbances from logging activity.

Equally important issues arise in regards to riparian and aquatic wildlife—this especially acute in intermittent streams with less of a streamside buffer zone. As part of a water quality monitoring team (McKenzie River Watershed) your mention of potential rising water temperatures runs counter to statewide efforts to improve conditions for salmonids and other indicator species. You do allow that certain habitat needs would not be met under Alternatives 1 & 2.

If I interpret the Draft EIS correctly: there is risk of population loss to 134 indigenous plant and fungi species on affected BLM lands. Habitat needs for associated forest floor species would be at risk of decline under all 3 Action Alternatives. I also note predicted decreases in the marbled murrelet and the total quantity of dispersal habitat of the northern spotted owl.

The EIS in its present form appears weighted heavily toward mechanized recreation. This emphasis can be witnessed in the OHV Shotgun Creek drainage site in Lane County. How would an increase in OHV use reduce “visitor conflicts” and at the same time enhance visitor experience and encourage public safety for non-OHV use?

The mention of permanent change to the “remoteness and naturalness” seems inconsistent with BLM stated goals pertaining to “mixed use.” Far too little attention is given to other BLM land uses. Why were only 5 areas (out of 146) selected to maintain “wilderness” characteristics? What are the criteria upon which these decisions are based?

The draft also states that “regeneration harvests” would substantially diminish any pre-existent visual resource quality. Any damage to paleontological and cultural/historical sites would be a significant loss to the public. An interpretation of Table 9 would indicate to me that all aforementioned categories would receive less management in general, under the proposed revisions.

I strongly encourage the BLM to *Maintain Current Management, the No Action Alternative* unless the above concerns are thoroughly addressed and the BLM can confirm sustained forest health. This may require that management of O & C lands remain under the provisions of the 1994 Northwest Forest Plan.

Sincerely,



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