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Western Oregon Plan Revisions
POB 2965
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Comments on the DEIS

Chapter 1: The explanation given on p. XLIII is that the plan is being revised because of low harvest levels, opportunity for greater coordination with recovery plans and refocusing of BLM goals. I consider this to be disingenuous—the truth but NOT the whole truth. The first mention of the out-of-court settlement between the American Forest Resource Council and the Federal Government to revise the management plans for all BLM lands comes at the beginning of Volume III, the appendices.

The DEIS claims that revisions are necessary to meet the terms of the O&C Act, particularly “sustained yield for the purpose of providing a permanent source of timber...” I consider whether the alternatives meet that goal.

Chap 2 lists **fire and fuels management** as an important issue, but comparison of the alternatives does not occur until Chapter 4. Clearly those alternatives that cut large trees lead to INCREASED fire risk because the largest trees are the most fire resistant and clearcuts the most fire prone. Alternatives that emphasize fuel reduction treatments would be the most likely to reduce fire. Fire decreases the amount of timber available for harvest and increases the time it takes for harvestable timber to grow. Thus the NO Action Alternative is predicted to have the least fire.

Chapter 4 p. 486 lists **global climate change** as an area with incomplete or unavailable information. A portion of one page (491) is allocated to climate change. “The analysis assumes no change in climate conditions, because the specific nature of regional climate change over the next decades remains speculative.” This is an extremely naïve denial of a large literature about climate change in the Pacific Northwest. Evidence predicts warmer temperatures, both winter and summer, and drier conditions with adverse consequences that lead to poorer conifer regeneration and greater fire risk. For example, see Harris et al., “Ecological restoration and global climate change,” *Restoration Ecology* 14:170-176 (2006).

While the predicted changes may not be uniform across BLM lands in Oregon, they will most certainly be felt in the Medford and Roseburg districts where rainfall is less. Chapter 4 on fire risk takes the 100-year view. The BLM needs to take a similar long-term view of climatic factors affecting reforestation.

To manage lands for sustained timber yield, the agency must plan for climate change: Where and under what conditions of temperature and rainfall do timber species grow best now? And where will these conditions be in the future, that is, how will the climatic envelope shift to change the location of good growing conditions? To fail to consider that is not to plan.

The plan does not meet the goals of sustained yield of a permanent source of timber because it proposes alternatives that INCREASE FIRE RISK and IGNORE GLOBAL WARMING. Given these factors, there is really no way to have a permanent source of timber.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read "Darlene Southworth". The signature is written in a cursive, flowing style.

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