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To: Bureau of Land Management  
From: Garrett Brauer  
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Date: December 9, 2007  
Subject: Comments on WOPR Draft EIS (especially Medford District)

Given the socioeconomic conditions of 2007 compared to those extant in 1937 when the O&C act was enacted, it is almost ludicrous to march to the orders of the O&C act as if there were no opportunity to revise it to meet current conditions. The demand for wood products in this region, especially for plywood, is down and likely to remain so. I believe we will never see (and should not want to see) levels of logging that were envisioned in 1937. In the Rogue and Applegate valleys the economic base is now moving away from polluting and extractive industries and we should encourage this trend promoting a less polluted and more diverse and economically viable communality. Large increases in logging are moving in the wrong direction.

Of paramount priority in considering any alternatives would be:

- 1) Enhance and maintain as much structurally diverse forest as possible to reduce the severity of wild fire, erosion, enhance the visual and recreational appeal of the forest, and protect fish and wildlife. "No Green Trees Standing", i.e. "clear cutting" should be absolutely eliminated from any alternative.
- 2) What logging is done should be done in a way to have minimum damage to the diverse ecosystem. Specifically this should be done:
  - No reduction in riparian buffers as is proposed in several alternatives
  - High number of seed and legacy trees left standing to promote quick regeneration and minimize erosion
  - Great care in construction of any new logging roads to minimize disturbance and erosion.
  - Decommissioning of unneeded roads to minimize erosion.
  - Encourage, even if it means subsidizing, the logging and utilization of small diameter trees selectively removed to promote a more structurally diverse and fire resistant forest.
  - Log in a way to minimize invasive species establishment. I see no provision in any alternative to reduce this serious threat
- 3) To encourage quicker regeneration and minimize erosion there should be no salvage logging from late successional reserves after wildfires. I've personally toured the Biscuit fire and seen how much better the forest looks without the disturbance of salvage logging.
- 4) Maintain, expand and connect late successional zones. This will benefit fire protection, wildlife, and recreational use.

5) OHV Strategy

- I support establishing a small number (not as many as the 13 being considered) of intensively managed and concentrated OHV recreational areas.
- Areas should not be established where there is significant private land and residences nearby. This would take the John's Peak area off the table for consideration.
- Hand in hand with establishing the OHV management areas should be large scale closing of almost all forest roads to OHV's.
- It will be prudent to establish a minimum number of "designated trails" on forest roads outside of the management areas.

*Garrett Brainer*