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Upper Rogue Watershed Association

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The Upper Rogue Watershed Association (URWA) would like to comment on the proposed Western Oregon Plan Revision (WOPR) draft EIS document.

The URWA, a watershed council, is a citizen group recognized by the Jackson County Commissioners with the mission to restore and enhance the subwatersheds of the Upper Rogue as initiated by the Oregon Watershed Enhancement Board (OWEB). Our geographic area of concern is the headwaters of the Rogue River downstream to Dodge Bridge.

OWEB established principles for watershed restoration priority in 2004. These principles were utilized in guiding the watershed assessment of the subwatersheds of the Upper Rogue below Lost Creek Reservoir completed December 2006. URWA bases all our responses to the WOPR on the Upper Rogue Watershed Assessment findings.

HARVEST

- **All the action alternatives will generate more revenue to Jackson County.** We applaud the BLM for attempting to find ways to help the County fund operations, particularly road maintenance. Poorly maintained roads are a source of sediment transport to our streams ruining fish habitat and reducing the quality of drinking water.
- **Tree cover is important on the landscape of the Upper Rogue** for a number of reasons; to **intercept rain and snow** and **minimize erosion** with sediment transport to streams; to **provide shade to streams in a climate zone with long hot, dry summers**; to **provide wildlife habitat**; and for the **visual quality** loved by those who live here and those who visit here expressly for the enjoyment of the scenic beauty.
 - The harvest levels by the regeneration harvesting proposed in **Alternatives 1 & 2 shortens the rotation age and leaves too few trees per acre** to adequately provide the needed rain and snow interception, particularly in a transition zone where rain-on-snow events are considered common, threatening to greatly increase erosion and sediment delivery to streams. Research shows retention trees/retention patches hold snow and water intercepting precipitation to prevent erosion and holding water longer in the season.
 - Shorter rotations by regeneration harvest **may cheat soil enrichment** by frequently disturbing the forest and the forest may need artificial fertilization to maintain soil nutrients and maintain soil productivity to sustain the growth predicted in Alternatives 1 and 2.

- **The increase harvest levels in the action alternatives would require more road development.** Additional road development, particularly in subwatersheds where private industry is actively developing roads and harvesting, will increase the negative impacts to watersheds through increase erosion and sediment transport to streams as well as detrimental compaction and soil disturbance.
- **The increased harvest levels of the action alternatives will have negative impacts to wildlife habitat,** benefiting possibly deer, but destroying the habitat of many other species dependent on our forest landscape.
 - Alternatives 1 & 2 propose leaving no Green Tree Retention (GTR) areas. Without the older legacy trees left in retention patches for wildlife, future forests will become simplified and will lack future structure development. **We want to see our forests look like a forest with the large legacy trees remaining.**
 - Harvest levels proposed in Alternatives 1 & 2 with short rotation ages creating a landscape with few, if any, legacy trees. **Short rotations will make snag recruitment of adequate size dead trees to be useful to wildlife increasingly difficult, if not impossible to maintain.**
- **The increased harvest levels will create a need for more “no touch” late seral areas** to provide refuges for wildlife species.
- **Thinning rather than regeneration harvesting can maintain or come close to producing the same volume over time.**
- **Please do not heed the pleas to harvest at accelerated rates** today only to leave the future generations without either a forested landscape or a means of revenue and livelihood.
- **RIPARIAN MANAGEMENT**
 - **Riparian no cut shade zones need to be adjustable by local land managers** to give more than the minimum shade area. **Do NOT adopt the minimum shade zone widths embraced by the Oregon State Forest Practices Act.**
 - **Alternatives 1 & 2 have too narrow of shade zones** proposed for the Upper Rogue watershed area conditions.
 - **Utilize the shade zones of the No Action Alternative but allow adjustment by local land managers** to cut vegetation in riparian zones where thinning will benefit streams.
 - **URWA does not support the “one-size-fits-all” approach of riparian management** demonstrated in the action alternatives.
 - **303(d) listed streams of the Upper Rogue need more shade and a wider shade zone** to cool streams in our long hot, dry summers compared to streams further north and west managed by the BLM. URWA works to improve the watershed and stream conditions to eventually get the State to de-list streams currently labeled as water quality impaired.

- **FIRE**

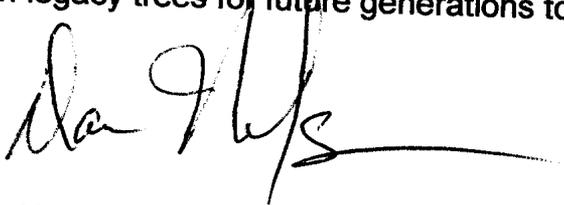
- The proposed increased harvest levels of the action alternatives and the shortened harvest rotations of Alternatives 1 & 2 will create a landscape of simplified forest blocks with a **lower resiliency to fire effects resulting in poor recovery from fire events.**
- A simplified forest would be composed chiefly of younger trees lacking the thicker bark and higher limbs of the more mature forests. **The trees of shorter rotations would be less resistant to the negative effects of fire.**

- **OHV (Off Highway Vehicle) USE**

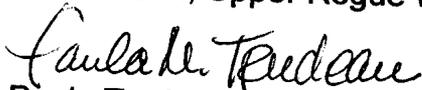
- **The proposed Obenchain OHV Area is an inappropriate activity within the Big Butte Creek subwatershed.**
 - This subwatershed is a **key watershed for anadromous fisheries**; intense off-road vehicle use will **increase road density, increase erosion** with the increased likelihood of sediment transport to fish-bearing streams.
 - Unless the BLM is committed to supporting adequately funded **law enforcement for OHV areas** these recreational areas will have **uncontrolled trail development, introduce and spread more invasive plant species, ruin areas of sensitive plants,** and generally **increase the amount of trash dumped illegally.**
 - Increased concentration of OHV users in the Big Butte Creek watershed will **increase the chance of a human-caused fire ignition source.**
- **Please direct OHV users to use more appropriate and legal areas to recreate.**
- **Any OHV areas should have use tracked and monitored to understand impacts to resources and to limit or curtail use when resource damage to the watershed becomes unacceptable.**

- The Upper Rogue Watershed Association represents a diverse stakeholder and citizen support base. Despite the diversity we speak as one when we say we would like the BLM to manage both public domain and O&C lands to maintain or improve watershed health and to retain legacy trees for future generations to see natural forested areas.

• Sincerely,



• Don Nelson, Upper Rogue Watershed Coordinator



• Paula Trudeau, Upper Rogue Watershed Co-Chair

• Dee Hawkins, Upper Rogue Watershed Co-Chair