

WOPR comments from:

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Helen Scott
346 Bickford Drive
Grants Pass, OR 97527
541-660-0773
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I support Alternative 2 of the draft EIS with additional (1) increased timber harvest with socio-economic benefits to counties, (2) increased OHV opportunities, (3) reduced riparian setbacks, (4) increased firewood cutting opportunities for greater fuel reduction to protect the resource from fire loss, (5) improved transportation access for fire fighting equipment and personnel, and for Wild & Scenic Rogue River rafters, (6) increased efforts to promptly plant restock trees after a timber harvest and (7) continued and increased access to minerals and alternative energy sites.

(1) A 2007 U.S. Supreme Court case, *National Association of Home Builders et al. v. Defenders of Wildlife et al.* (decided June 25, 2007) determined that the O&C Act (McNary Act 1937) was superior to newer environmental laws. The syllabus relates that "a statute dealing with a narrow, precise, and specific subject is not submerged by a later enacted statute covering a more generalized spectrum." (*Radzanower v. Touche Ross & Co.*, 426 U.S. 148, 153) More timber can now be cut without application of certain environmental constraints. This case must be considered as "new information." Counties with high percentages of government land are suffering economically. Josephine County, according to the Oregon Employment Department, in November of 2007, had an unemployment rate of 7.3%. Our nation was at 4.5%, and Oregon was at 5.2%. O&C counties need more job opportunities. It is important for the federal government to recognize the impact of federal lands upon the O&C counties. The BLM must be staffed with timber sale employees and be prepared to provide opportunities for timber harvests as required under the O&C Act.

(2) Off Highway vehicle (OHV) opportunities should be increased for families and individuals because of the substantial increase in purchases and uses of OHVs, especially all terrain vehicles, and also because of handicapped opportunities under the ADA. The plans for areas of use with parking development is good. At least 50% of the possible 13 Medford District areas should be developed with priorities such as locations which do not disturb private lands and owners. One additional area should be held in reserve in case of fire or substantial damage to a planned area. Loop roads should be encouraged as well as a mix of beginner and advanced trails. Signage should be installed and maintained for open and closed areas. It is not sufficient to only mark open areas. Our counties do not receive sufficient funds from BLM to patrol or enforce BLM regulations. As an adjacent owner to

BLM land I am familiar with public trespass and noise issues, and I believe areas which will be OHV "emphasis areas" should not be close to private properties. While the BLM can repair damage from OHVs to public property, there is no fund to repair trespass damage on private property. In addition to the specific dedicated areas, other zones should be open during non-extreme fire season and during hunting seasons. As an Oregon pioneer hunter, I want to be able to use OHVs to assist me in extracting my game. I would suggest no overnight camping by users of OHVs in extreme fire conditions. I live in a high fire danger area as determined by the Josephine County Forestland/Urban Interface Classification Committee. During extreme fire danger conditions in the fall hunting season, I have seen warm, abandoned fires and new fire rings on BLM land near our adjacent property ownership. The BLM must balance the public's need to access BLM lands and the need to protect the timber resource and nearby communities from disastrous fire. In some cases cleared fire breaks might be built to help mitigate this problem. Outdoor recreation is important to families and individuals. It is important to the mental, physical, social and economic values of our community. We must provide sufficient OHV recreation opportunities as well as sufficient traditional recreational experiences.

- (3) Restrictions on cutting trees in some riparian areas need to be reduced. Recent studies have found that streams need shelter and open streamside sites. Aquatic foods for fish need some daylighting mostly for oxygenation. Also, streamside willow trees may need to be removed because of the leaves causing deoxidation of the water and resultant damage to fish food. www.nativefish.asn.au/cod/html, updated 10/07.
- (4) Increased opportunities for firewood collection need to be offered both for economic benefit to the community and for hazardous fuel reduction to help prevent wildfires from spreading. Some members of our communities need additional resources due to the depressed nature of our local economy. Qualified needs in Josephine County for individual and family food from the Christmas Basket Program increased this year about 30% over last year. Increasing home heating costs can be reduced and/or provided for by forest products as long as access is provided and permits are granted. Josephine County has had disastrous fires costing millions of dollars in the past several years. We must reduce the potential damage to property and timber resource.
- (5) Improved road network for fire suppression equipment and personnel will go a long way to reduce misfortune to timber due to fire. The last page of The Plan Revision News, August 2007, asks "How can we

increase the fire resiliency of the forests in the Medford District...”? One answer is that we need to clean up the forest more aggressively by harvesting timber, thinning, salvage and promoting firewood collection, then we will have a healthy forest with less risk of catastrophic economic damage by fire. And, we need prompt repair of damage to BLM roads that serve as the shuttle roads for the rafters on the wild segment of the Wild and Scenic Rogue River which is administered by the BLM. The lodges and rafting businesses must have a reliable transportation network in order to economically serve their clients. The BLM spends substantial dollars to advertise, control and staff the River program; it needs to put greater effort into keeping open the transportation roads for local rafters as well as for the out of area recreationalist.

(6) Increased efforts at replanting trees after harvest is important. I have been to the Hull Mountain area in Jackson County and have seen the side by side post fire comparison of private restocked land and BLM land with no restocking. It is a dramatic display of good private restock growth versus public brush land with no significant development of commercial timber. The O&C affected counties have an economic need for the government to be efficient.

(7) Continued access for mineral prospecting and removal and access for alternate energy projects, such as wind power, must be provided. Southern Oregon contains some of the nation's most important strategic minerals that we may need to access if the seas become dangerous for importation of metals. And, we should provide public access for potential alternative energy projects to reduce our dependency on foreign oil. This will also serve to increase our potential for local jobs and improve our county economic conditions.

In conclusion, the socio/economic conditions in the O&C counties of Oregon, together with the O&C Act of 1937, require that the BLM act aggressively to ~~prepare the forests for harvests and planting. This will also reduce the conditions~~ which promote catastrophic fires. And the BLM must provide good road access into the forest for fire suppression as well as for access for quality recreation and harvest of miscellaneous forest products. Finally the BLM must continue adequate mineral access and provide for access to alternative energy source sites. We must allow this access not only for the peoples and governments of our O&C counties, but to meet our current and future strategic metal and energy needs for the United States of America.

Thank you for this opportunity to comment.

Helen Scott

