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Bureau of Land Management
Western Oregon Plan Revisions
PO Box 2965
Portland OR 97208

Dear BLM:

Please include this letter as our comment on the draft Western Oregon Planning Revisions, or WOPR. I (George) grew up in Oregon, studied natural resources at Utah State University, and am retired from a career in natural resources policy and environmental protection. In my early years I often visited the Alsea Valley and other O&C lands between Corvallis and the coast. In recent visits to Oregon we have visited the Wild Rogue, the Applegate Valley, and lands to the east and south of Ashland.

Keep Old-growth Reserves: All the action alternatives delete large acreages of old-growth forests from Late-Successional Forest Reserves and Riparian Reserves. Under the existing Northwest Forest Plan these reserves are serving vital purposes consistent with the terms of the O&C Act of 1937. The NFP struck a wise balance by setting up these reserves, while focusing timber production on Matrix lands.

The reserves lands are vitally needed because they protect several outstanding types of ancient forest, they protect crucial watersheds used by salmon and steelhead and trout, they protect water quality for human consumption in several Oregon cities, and they protect wildlife habitat that complements larger blocks of habitat in national forests.

We urge BLM to keep the old-growth reserves and, if any changes are needed, focus on more effective thinning of second-growth stands. I have seen this practiced in the Medford District, and it is something BLM can be proud of. These second-growth lands should be managed to restore more natural forest conditions for the future, and a sustained yield of merchantable timber.

More Wilderness Recommendations: We visited the Wild Rogue proposed wilderness addition during our Oregon trip in March 2007, hiking along the trail to an old mining site. It deserves to be protected as part of the Wild Rogue Wilderness, but it is not included in your recommendations. Indeed, only 5 of the 146 candidate areas were included in the WOPR. BLM should include more protected areas as wilderness recommendations in the final plan, including Wild Rogue Additions, Whiskey Creek, Williams Creek, Reuben Creek, Wellington Mountain, Bull of the Woods – Opal Creek Additions, and Coast Range Wilderness – Wasson Creek.

OHV Emphasis Areas: We oppose the designation of “off-road vehicle emphasis areas” in WOPR – 100,000 acres of them in BLM’s proposal. It is time to curtail ORV traffic in the forests, not increase it. The impacts of ORVs are already clear, and those impacts

will grow if nothing is done. BLM should be moving toward less ORV activity in WOPR, not more.

We recently stayed in Jacksonville at a bed & breakfast inn, and we visited the Applegate Valley. We strongly oppose OHV emphasis areas at:

- Timber Mountain/Johns Peak near Jacksonville
- Ferris Gulch in the Applegate Valley
- Tallow Box Mountain area (Ruch/Applegate) proposed by ORV groups

Jacksonville and the Applegate are real gems, and they are attracting more tourism visitors like us who seek a quiet, natural area to fish, hike, picnic, or take a scenic drive. The unspoiled parts of the O&C lands are one of the assets on which southern Oregon is building its tourism industry. BLM must not encourage ORVs with their noise and their degradation of the land.

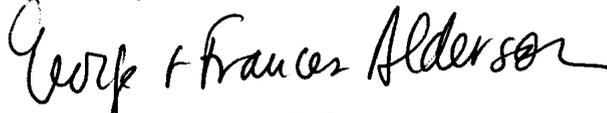
ORVs should be restricted to suitable designated routes where the soils and watersheds can resist the impacts of ORV traffic, where the vehicles do not impair wildlife habitat, and where the roar of ORVs will not disturb visitors who go there for a quiet day in the outdoors. The ORV route system should be small enough that BLM can enforce it, and within BLM's ability to maintain the routes without erosion and sedimentation of fish habitat. ORV groups have shown a willingness to assist with volunteer labor, but thus far not on a large scale.

O&C Lands Act: The O&C Lands Act of 1937 did not elevate logging to a dominant use. Rather, it placed it in a context with other goals including protection of watersheds, regulation of streamflow, contribution to stability of local communities, and provision of recreation facilities.

If the Department of the Interior believes the O&C Act elevates logging above all other uses, why doesn't BLM recommend a change in the law? BLM has the authority to submit a legislative proposal through the Secretary of the Interior to bring the O&C Act up to date with a full multiple-use mandate like that in FLPMA. That would be preferable to condemning these old-growth reserves to the saw.

Thank you for considering our views.

Sincerely,



George & Frances Alderson