



**Clackamas River Chapter-Trout Unlimited * McKenzie-Upper
Willamette Chapter-Trout Unlimited * Middle Rogue Steelhead
Chapter-Trout Unlimited * Oregon Council-Trout Unlimited * Public
Lands Initiative-Trout Unlimited * Tualatin Valley Chapter-Trout
Unlimited**

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

To whom it may concern:

Trout Unlimited is the nation's largest cold-water-fisheries conservation organization with over 150,000 members nationwide and over 3,000 in Oregon. Our chapter members are avid anglers, many of whom hunt as well. And they are willing to give back to fish and wildlife habitat through thousands of hours of volunteer habitat conservation projects.

We thank the hardworking folks at the Bureau of Land Management for the opportunity to comment on this important plan. We are submitting formal comments regarding the BLM's preferred alternative for the Western Oregon Plan Revision (WOPR). We appreciate the massive scale of work that BLM staffers conducted to put this document together though philosophically, we think it would have been more appropriate to do this district by district. Though we understand that litigation has prevented a steady and secure amount of wood fiber to local communities as envisioned in the 1994 Northwest Forest Plan (NWFP), the BLM's preferred alternative and other action alternatives essentially eliminates the standards set by the NWFP and the Aquatic Conservation Strategy (ACS). There seems to be no middle ground or a variety of balanced alternatives from which to choose.

Certainly removing smaller diameter trees and continued harvest and regeneration in second growth plantation stands as well as removal of ladder fuels in urban-wildland interface areas should be done with high standards that adhere to the NWFP and the ACS.

Much of this can add a reliable amount of wood fiber to local mills and communities which is critical to local economies.

RIVERS and STREAMS

The BLM's preferred alternative will reduce streamside reserves by over 50%, which will open up over 200,000 acres of previously protected riparian forests. A significant reduction of "no-logging" buffers on fish bearing streams to 25 feet will damage riparian areas and harm our already decimated anadromous fish streams, many of which are now beginning to recover. The preferred alternative also allows logging within 25 feet of streams for "operational" reasons. This riparian adjustment is not supported by sound science. The ACS that has been implemented during the last decade from the Northwest Forest Plan, has helped lead to the recovery of previously damaged rivers and tributaries. The Oregon Coastal Salmon Restoration Initiative (OCSRI) emphasizes the importance of the Northwest Forest Plan's ACS:

"The Aquatic Conservation Strategy associated with the Northwest Forest Plan should dramatically improve fish habitat, watershed stability, and water quality over time. This is one of the major anchors of the OCSRI restoration strategy." (OCSRI Executive Summary page 10)

"The Northwest Forest Plan is expected to substantially improve watershed health and salmon production on federal land and in downstream areas. The Aquatic Conservation Strategy and commitment to monitoring provide a cornerstone to the OCSRI." (OCSRI Volume 1 Page 7)

Scientists have documented improved conditions in 64% of BLM and USFS watersheds covered under the Aquatic Conservation Strategy of the NWFP, declines in 28%, and unchanged conditions in 7%. Considering that wildfires burned more than 30% of the watershed areas studied, this research shows that the ACS is working since 1994. (Reeves, Williams, Burnett and Gallo. 2006. The Aquatic Conservation Strategy of the Northwest Forest Plan. Conservation Biology 20:319-329)

In watersheds under BLM jurisdiction and management, over 700 miles of streams are listed as water quality impaired under section 303d of the Clean Water Act. The biggest culprit listed is water temperature (569 miles). Reducing streamside buffers to 25 feet could further damage our streams and fisheries by raising water temperatures.

Additionally, by our count, only 5 out of 170 watersheds were evaluated during this process and there seems to be no evaluation for non-listed fish species. It's critical that all watersheds be evaluated separately because they are all different. It seems to us it would have been less complicated for the public and easier for the BLM to conduct these types of evaluations district by district rather than encompassing everything in the western Oregon region.

The BLM and the US Forest Service are critical partners in the challenge to restore the northwest's salmon and steelhead runs. Following the important and science-based standards set by the Northwest Forest Plan and the ACS are an integral part of bringing back these important fish, which will help local and predominantly rural communities economically.

WILDLIFE HABITAT

Under the BLM's preferred alternative, Late Successional Reserves (LSR) or old growth stands will be reduced by over 40%. Current logging would be nearly tripled to total 14,000 acres of clearcuts per year. Many low elevation west side forests are made up of oak savannas, buckbrush and manzanita. Converting these low elevation forests to tree plantations will harm habitat for important wildlife species such as blacktail deer, Roosevelt elk and black bear. All of these species depend upon a certain degree of security, cover and winter forage in these areas. Much of this country is excellent winter range for deer and elk and must be protected from development. Oregon Department of Fish and Wildlife has documented blacktail deer migration with radio collars that move from the Klamath Basin all the way to the winter range near the Green Tops on BLM land near Eagle Point. Our general deer and elk seasons are already short enough and we do not want to go the direction of reducing hunting opportunities because of a corresponding loss of low elevation winter habitat. Building 1000 miles of new roads within the first 10 years of implementation of the preferred alternative could fragment wildlife habitat and further erode security for big game animals such as elk. Numerous studies in the past two decades at the Starkey Experimental Forest and Range in Oregon document the negative impacts of roads on elk. Many of these roads might be exploited by off highway vehicles and a spider web of new and illegal roads could spiral off of the new BLM roads.

OFF HIGHWAY VEHICLES

Within the WOPR there are some positive aspects regarding OHVs that we would like to emphasize. All of the action alternatives would remove the current 330,394 acres of "Open" area designations (cross-country motorized travel) in BLM districts, leaving a total of only 77 acres as Open in one location. All action alternatives include a net increase of 14,206 acres Closed to motorized travel, including new Roosevelt elk emphasis areas totaling 6,100 acres in the Salem District, expansion of the Table Rock Wilderness closure (262 acres), and the 6,608-acre North Bank WMA, Roseburg District. All of the action alternatives would limit motorized travel to designated routes, with Transportation Management Plans to designated individual routes to be completed within 5 years of WOPR implementation. This is extremely important. Designated routes and firm enforcement are crucial in this equation. All action alternatives do not default to wide-scale designations of OHV use as being "Limited to Existing Roads and Trails," as was the case in the 1995 RMPs, which left 949,882 acres with this OHV classification. The 1995 designations were, in application, essentially the same as "Open" area designations because in most cases BLM never undertook an inventory of "existing"

routes and, consequently, does not to this day have a baseline for what routes existed in 1995.

It's obvious that Off Highway Vehicle (OHV) use has sky rocketed on public lands during recent years. OHV overuse and abuse can fracture important fawning and calving ground for deer and elk, disrupt migration corridors for all big game animals and violate the security that many animals need, particularly in the winter when their stress levels are the highest (Rowland, Wisdom, Johnson and Penniger- The Starkey Project, 2005). OHVs also transport noxious weeds and noise levels ruin the solitude that many hunters, anglers, horse packers and other recreationists seek. The WOPR DEIS points out that there will be an annual increase of 27% in traditional, non-motorized recreation and only a 2.3% annual increase in motorized recreation. The focal point though of the WOPR is motorized recreation. The preferred alternative would designate 11 new and 2 potential "OHV emphasis areas" which would be an increase of 77,000 acres over the current Johns Peak area. Again, much of this would be in critical, low elevation areas such as Johns Peak, Illinois Valley, Anderson Butte, Lake Creek, Salt Creek and the Worthington Road/Obenchain road and several other areas in Southwest Oregon. If these emphasis areas are implemented, foot hunters, horse packers and others will not be welcome in these areas that will be over run with loud OHVs. Turkey hunting, deer hunting, bear hunting and elk hunting opportunities could fade away in these areas. Current research from Starkey indicates that disturbances of big game from All Terrain Vehicles (ATVs) exceed all other recreational activities such as horseback riding, hiking and mountain biking (Naylor, The Starkey Project, 2006). Both state and federal agencies can not manage OHV use to begin with so it makes no sense to create new "emphasis areas" that can not be managed. Unfortunately, John Peak provides an example of an area where the land has been over run by use and abuse and local private land owners are fed up with much of the illegal activity nearby. Our view is that if the BLM can not police OHV abuse in certain areas then those roads should be closed to that type of use. Enforcement is a critical component. Setting standards by making examples of individual abusers will resonate with others.

OHV "emphasis" areas that we recommend be *removed* from the BLM's list:

- **Anderson Butte** — 11,742 acres. There is extreme catastrophic wildfire danger on western side of this area, several areas of critical environmental concern and half of the area is located in very important wildlife habitat with anadromous, fish-bearing streams, adjacent private properties and historic Sterling Mine Ditch and Trail. There is important winter range for blacktail deer and Roosevelt elk as well as great opportunities for hunting turkey and quail. This area is located not far from the growing population centers of Phoenix and Talent and provides an important transition area for wildlife from the high Siskiyou country.
- **East Howard** — 6,812 acres. Many horse back riders use this area and there is excellent hunting for blacktail deer, Roosevelt elk and black bear.

- **Lake Creek** — 8,561 acres. This area has extreme wildfire risk, a critical environmental area and important wildlife habitat. Much of this area is winter range for Roosevelt elk and blacktail deer and there is phenomenal turkey hunting in the area. There are several seasonal steelhead spawning tributaries that run through this area.
- **Worthington-Obenchain** — 9,410 acres. This is one of the prime wintering areas for blacktail deer and Roosevelt elk with plentiful turkey and quail hunting opportunities. There are multiple seasonal steelhead spawning tributaries in the area and Little Butte Creek, which provides spawning and rearing for much of the Rogue River's salmon and steelhead runs, flows nearby. Much of this area has been trashed by illegal and abusive OHV use on and near the Green Tops and is now beginning to recover. Many local land owners use the area for hiking and horseback riding and there are increasing conflicts between adjacent private property owners and illegal OHV users.
- **Johns Peak**—This is already an emphasis area and because of overuse and abuse, fish and wildlife habitat has been harmed and there are many conflicts with private property owners and residents nearby. Many seasonal and year around streams provide spawning and rearing for summer steelhead and great fishing in the middle Rogue River. This area should be re-evaluated for OHV emphasis use.

We do not have enough information regarding the other emphasis areas and can not render an opinion about them.

AREAS of CRITICAL ENVIRONMENTAL CONCERN

Areas of Critical Environmental Concern are important habitats for fish and wildlife and offer people some outstanding and unique recreational opportunities. Under the preferred plan, many of these areas will be eliminated. Areas such as the North Santiam ACEC, Sandy River Gorge ACEC, Cottage Grove Old Growth ACEC, Umpqua River Wildlife Area ACEC, North Umpqua River ACEC, Jenny Creek ACEC, Rough and Ready Creek ACEC and the Upper Klamath River ACEC, must keep their status as they have already been evaluated as outstanding areas. We believe these areas should stay intact with a minimum of human disturbance.

TROUT UNLIMITED'S RECOMMENDATION

In our view, because the DEIS published by the BLM did not contain an adequate and balanced number of choices, we recommend that they offer a full range of diverse alternatives that retains protections for fish, wildlife, forests and streams under the 1994 Northwest Forest Plan. We also advocate that BLM evaluate OHV emphasis areas district by district separate from the WOPR.

THE FUTURE

With Oregon's population burgeoning close to 4 million, the pressures of development and loss of habitat mount for our fish and wildlife heritage. Hunting and angling annually generates over \$857,000,000 in Oregon (USFWS, National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, *State Overview*, 2006) with over 750,000 people participating in these activities. We encourage federal natural resource management agencies to take more of a stewardship role to emphasize recreation on public lands. Mining and logging is part of the multiple use mandate of our public lands but it is not only option that we should consider. Hunting and angling as well as other forms of recreation are long term and completely renewable. We owe it to our children to protect our fish and wildlife resources and our hunting and angling heritage.

Sincerely,



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