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To Mary Ceciliani/ORSO/OR/BLM/DOI@BLM
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Subject Another WOPR PDF comment

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WESTERN OREGON PLAN REVISIONS
DRAFT ENVIRONMENTAL IMPACT STATEMENT
12/07
PO BOX 2965
PORTLAND OR 97208
CITIZEN COMMENTS

To Whom It May Concern:

Please accept my comments as a private citizen residing in the Medford District Butte Falls Resource Area.

I PURPOSE AND NEED

A. **Conflicted Objectives-** No Objectives were listed in this document for the plan as a whole. Therefore the Purpose and Need will be assumed to contain the objectives of the proposed plan.

1. The Purpose and Need of this proposed action is to manage for timber production (permanent forest production) in conformity with the principles of sustained yield)(pg XLIV). Sustained Yield means that BLM should honor the even-flow, non-declining yield provision. A mandate of conformance with the O&C act is sited as justification for this. The plan, as stated, will not meet this standard of conformance.
2. The other mandate of objective is maintenance of habitat under the ESA, Clean Water Act, and FLPMA.
3. When exploring the Alternatives and the proposed management practices such as Clear Cutting (Regeneration Harvests), of 224 Square Miles in the first decade, it is shown that maintenance of late successional habitat would be impossible given 80 year rotations. The reduction of LSRs by 47% would obliterate late successional and riparian habitat and leave tree plantations on most of the landscape. Fragmentation of the remaining late successional habitat would reduce the effective connectivity required for intact habitat, rendering these landscapes ecologically unable to sustain late successional species. There is a legal problem here in that a judgement from the 9th Circuit by Judge Dwyer stated that the NWFP was the minimum that was needed to maintain species viability and avoid Jeopardy for the Northern Spotted Owl and related late successional species.

B. O&C Act-BLM Interpretation

The BLM interprets the O&C Act as justification for managing most of its lands for timber production in the form of plantations with rotations of 80 years. However, the proposed clear cutting and replanting schedule of 140,000 acres in the first decade will not meet the test of sustained yield(as defined by even-flow). These are overly optimistic assumptions about the regeneration of tree farms in Southern Oregon. This is especially true when climate change patterns predict a hotter, drier climate in years to come.

The O&C act also mandates recreational activities and conformance with ESA and the Clean Water Acts. "Other Uses" are also defined by FLIPMA as: "Protecting Watersheds and Regulating Stream Flows". The BLM chooses to place timber production above all other Forest uses. These uses are in conflict with the proposed RMP.

C. Because the document as a whole lacks clear objectives, one is left to assume that the purpose and need have one objective of returning the O&C land base to the Clear Cut plantations of the 60s and 80s. Many of these were unsuccessful both on BLM and private lands.

II ALTERNATIVES

1. The Broad Range of Alternatives required by NEPA is completely missing in this plan. It may, therefore, not be legal for this reason alone. This extensive publication exists to demonstrate that there are really no choices for the public to respond to other than the clear cut or extreme uneven age model(Alt III). The Preferred Alternative is a valid Alternative in that it meets the legal obligations of the Settlement Agreement between the agency and the Timber Companies. However, the lack of other realistic viable alternatives closer to the NWFP is missing in all but the "No Action" Alternative. The choice of OHV areas is not to be confused with real management alternatives as defined by NEPA.

A. **The Preferred Alternative**

2. This Alternative will nearly triple logging on BLM lands from 268mmbf/year to 769mmbf/year. This is an increase of 146% on 10% of the NWFP land base. Most of this cutting will be Regeneration Harvest or Clear Cuts. The amount of Late successional forest to be cut is doubled.
3. This Alternative will reduce LSRs by 47% of the NWFP levels and reduce Riparian Reserves by 57%.

This Alternative will decimate watersheds and streams and increase fire hazard while decreasing late successional forest resiliency to fire.

B. **The "No Action" Alternative**

This Alternative would continue with business as usual. This would be infinitely preferable to the WOPR proposal. However, there would have been no need to publish this EIS if the BLM were planning to retain the protections in the NWFP. If there is to be a new RMP, BLM needs to go back and come up with something else.

III EFFECTED ENVIRONMENT

A. **Water**

1. Part of the O&C Act places value on other land uses besides timber production. These mandates include regulating stream flows and protecting watersheds. The DEIS claims there will be no effect on fish, wildlife, peak flows and sediment in streams from this extensive proposed logging in Alternative II.
2. During the first decade, Alternative II will reduce the reserve system from 364,000 acres to 156,000 acres(about 51%).
3. BLM lands provide important habitat for Salmon, resident fish, and other aquatic species. There are more than 20,400 miles of rivers and streams and 218,199 acres of lakes, ponds, and wet lands (which provide clean water) and wildlife habitat. The implementation of Alternative II will compromise these wet areas due to the reduction in protected stream buffers in Riparian Zones(DEIS pg 52). Alternative II makes drastic cuts in the Riparian Reserve system.
4. Perennial streams would be especially at risk where logging is allowed within 25 ft of the bank. Scientific studies emphasize the importance of perennial streams, as does the NWFP ACS. The ACS, which has been upheld by the courts would be eliminated under WOPOR.
5. Water Quality Limited Streams
   Conditions that contribute to the status of these streams will be made worse by Alternative II. As it is, BLM has 704 miles of streams listed as "Water Quality Limited" due to temperature (the most common reason), low dissolved O2, high bacteria levels, and heavy metal contamination (Clean Water Act 303d).

The severity of these water quality problems will increase as protection decreases. Part of the WOPR Purpose and Need is to ensure that the protections of the Clean Water Act are being enforced. There is also a management objective to restore stream complexity. The Purpose and Need in this area conflicts with the plan for increased timber production. Management mitigating measures proposed are inadequate since shade and stream bank stability will be compromised.

B. **Fire**

1. Fuel treatments and logging could contribute to creating a hotter drier landscape that could encourage and intensify fire risk.
2. According to information on pg 394, streamside harvesting practices have contributed to loss of resiliency of forests and therefore make them less fire resistant and more at risk for development of conditions that lead to stand replacement fires. Replacing late successional forests with even aged tree plantations will intensify these conditions and lead to higher fire risk and severity.
3. The emphasis in the document is on fire suppression rather than promoting a more resilient forest able to resist stand replacement fires. Pg 33 Management objectives and actions of Alternative II will create 200,000 more acres of stands at risk for high fire severity.
4. The WUI shown on the BLM map on pg 155 seems inaccurate and is in disagreement with information from the Oregon Dept of Forestry. The WUI is supposed to be where human communities are located, not the entire BLM land in the in a given project. Emphasis should be placed on protecting homes in these WUI areas, not fighting fires in the wildlands. According to the latest science, wildland fires(which usually burn in a mosaic pattern) should be allowed to burn.

C. **Soils**

1. All activities described in Alternative II will decrease soil productivity over time. Adding Fertilizer will add 1 element needed for soil productivity. It will not reduce compaction or erosion. Many clay soils in the Medford District are subject to severe compaction, especially when wet. Other granitic soils are subject to erosion. There are many different soil types in this district.

It does not sound like site specific analyses have been done on all the lands subject to be turned into plantations. I did not see plans for such analyses in the document. The information given in the document was minimal and nothing about it was stated in the management objectives or discussed under the preferred alternative.

2. According to the DEIS pg 794, the extent of existing compaction caused by past timber harvest is unknown. In light of this, how can the effects of future massive timber harvests be predicted? Nothing was said about how future soil compacted areas will be ameliorated. Depending on the type of soil, tilling, for example could compound compaction problems.

3. Yarding systems used must take into account more than just slope percentage. Ground based systems can be very damaging depending on the type of soil, the slope and the aspect. Ground based systems are usually more damaging regardless of where they are done.

4. The agency has a history of unsuccessful plantations in many parts of Southern Oregon. Logging methods and management of plantations have contributed to this, as has the hot dry climate in Southern Oregon. Much of the land planned for harvest in Southern Oregon is not suitable for multiple rotations and the influence of climate change that was not adequately addressed in this document will make this worse. There is no way to prove that clear cutting the last of the original mature forests would leave land that would productively produce more trees. Yet, there is evidence from the past that many of these lands would never recover.

5. Effects of fire on soils
    a. Natural fires burn in a mosaic pattern and burn cooler in mature tree stands clearing out brush and other plants that interfere with development of those stands. Where the fire burns hot, is usually in open brush covered areas.
    b. Broadcast burning and hand pile and burn techniques can damage the soil be cause the heat is concentrated in one area.

6. Effects of <u>grazing on soils</u>

    It has been the practice of BLM over the years to grant large grazing allotments to ranchers. Cows break down stream banks and destroy native

vegetation and trample soils. Yet the ranchers are charged minimal amounts for use of public lands.

D. **Fish**

Abandoning the ACS of the NWFP will increase the likely decline in populations of salmon and other fish species-As previously mentioned, the ACS has been upheld in the courts. The claim of minimal or no effect on fish and wildlife in the DEIS despite the lack of stream protection and increase in logging has no scientific basis. Reduction of stream buffers combined with proposed logging increase will put further stress on populations already in marginal circumstances in many areas. On pg 335-336 Vol I, the DEIS discusses T/E fish species. The preferred alternative will lead to the further decline of these species. On pg 341 Fig 82 shows the large road and stream crossing density in Evans Creek Watershed. I live in this watershed and have observed the damage(both private and public) from logging, road building and grazing over the years. How will this plan help this watershed?

E. **Wildlife Indicator Species**

Late Successional Reserves

Two mature forest indicator species discussed in the DEIS are the Northern Spotted Owl and the Marbled Muerlett. Both of these species are in severe decline due to habitat loss. Logging in late successional reserves will contribute to this decline and reduce the populations further. Reduction of habitat for the NSO makes it vulnerable to attack by predators such as the Barred Owl. Edge effect created by opening up the canopy of the forest makes the Spotted Owl more vulnerable. The BLM WOPR relies on the draft Spotted Owl Recovery Plan(see discussion under Scientific Inaccuracies and Questions-IV)that did not meet peer review, and proposed critical habitat exemptions by the Fish and Wildlife Service. These proposed changes lower habitat protections for a species that is already declining. By reducing the reserves, critical habitat is reduced.

F. **Vegetation/Plant Communities**

1. By reducing the forest community to early seral stages, a functioning ecosystem is destroyed. Doing this on the scale of the proportions proposed in the Preferred Alternative can have far reaching residual effects. The loss of other forest products such as mushroom gathering and tourism(nobody wants to hike

through a clearcut)will be an economic hardship for those who depend on those activities for income. Many products listed on pg 251-252 depend on an intact forest.

2. Plant diseases such as Sudden Oak death and Port Orford Cedar Root disease are transmitted through human movement through wet soil-boots, equipment, etc. The DEIS fails to adequately address these risks when planning the immense amount of increased logging.
3. Human entrance into new areas also increases the risk of introducing exotic plants such as Star Thistle that are very difficult to eradicate once established. Spraying the area with herbicides can create other problems beyond the scope of this document.

G. **Road Construction**

New road construction was addressed briefly on pg 600 with regard to the Klamath and habitat types of plants. The amount of new road construction required to harvest the amount of timber planned for harvest under Alternative II must have impacts that reach beyond the Klamath. This subject was not adequately addressed.

H. **Timber Management**

1. The management of timber production is taking a giant step backwards under WOPR. BLM has returned to clearcutting(Regeneration Harvest) as a method of choice for extracting timber. Tree farms have proven to be unsuccessful in the long term for a variety of reasons especially in Southern Oregon where the hot dry climate is not conducive to rapid conifer growth. In spite of various treatments, such as fertilizer and herbicides, many unsuccessful plantations have become vast brush fields. This effect can be seen in Southern Oregon on private timber lands that boarder BLM forests that have been managed under the NWFP as well as in BLM forests that were managed in the old way before the NWFP.

In the northern part of Oregon and Washington and in Coastal areas conifers grow more rapidly with the potential to regenerate forests. However most of these plantations do not have a chance to become forests because of short rotation harvest periods. Also they are composed of one crop with the diversity of an actual forest being discouraged.

Some lands referred to in the document as LSMAs have been set aside as a method of protecting some mature forests, but very few are in Southern Oregon in the Medford District. Plantations with 80 year rotations will never become forests. With 50% of the lands in the Medford District in the harvest base, there won't be much left of the late successional forests here. Any form of uneven age management would be preferable to clear cuts for reasons mentioned earlier. Alternative III addresses this issue but is lacking other protections.

2. An alternative management strategy would rely on thinning smaller trees< 80 years old that could produce a sustainable supply of timber required by the O&C Act while at the same time retaining the intact forest structure that is important for clean water and diverse plants and wildlife. Restoration thinning would protect and restore the forest while contributing to the timber supply.

I. **Energy/Minerals**

1. Oil/Gas Development-Coos Bay/Salem Districts
   I am concerned about the large Natural gas development that is taking place in Coos Bay district. A potential pipeline could irrevocably change the landscape and have negative environmental effects on surrounding communities. It was not clear what economic benefits would result from this project and who would receive them. The potential for exploration and development in the next 10 years is of concern as well for Salem and Coos Bay. Leasing prices are low. It seems as though the tax payers could be getting more for their money. The potential for private and public land disturbance is huge.
2. Mineral Development
   Historically up to the present, surface and dredge mining have been established in the Medford District. More applications are being filed to the detriment of the streams and landscape. The high number of "Recreational Mining" claims is of particular concern in that these are "hobby" miners and not dependent on this practice to make a living. There was no definition of this practice with regard to the requirements or restrictions. How is it different from other types of mining? There are a lot of applications in the Medford

District-enough to impact the landscape and streams negatively.

J. **Recreation**

OHVs

There are an unprecedented number of OHV sites planned for the Medford District. A number of these places are already being used illegally for this purpose and new ones are being created. Map locations of planned sites were not available in the document. Maps with Range/TWP and Section should have been provided. Some of these sites such as John's Peak are close to residences where noise is of concern. Others impact horse and hiking trails.

When land is designated for this use, it is essentially a sacrifice area-not usable for anything else. The noise and toxic wastes and fumes make it impossible to be used for other types of recreation. Also, OHV users do not usually stick to designated trails so more land will be impacted than just the trail and road system.

It is important to designate some places for this activity but the plan gives too much land away for this in the Medford District. The increased road system for timber harvest will allow more OHVs to enter the forest land base to the detriment of other people, landscapes and wildlife.

K. **ACEC/Land Conservation System/LSMAs/Other Protected Areas**

1. The Preferred Alternative eliminates or partially eliminates 36 ACECs. ACECs are recognized by the agency as having special values and are set aside from timber harvest.
2. The VRM criteria are also removed. This means that clear cuts will now be visible to the casual observer from the highway. This could effect the tourist industry. People on river trips and hiking trails hardly want to look at the results of Regeneration Harvests. Social and economic impacts other than timber production were not considered here(see X-Economy).
3. LSMAs
   There are few of these and most are not in Southern Oregon. This system should be expanded. No timber harvest should be allowed in these areas.
4. Protected areas have been diminished in this document, especially in the Medford district. Information on this subject was scattered though

out the document and hard to comprehensibly integrate, especially when referring to removing O&C lands from these areas. Maps were unclear.

5. In the Medford District, the nature of these lands must also be examined. Many will have trees 10 years old or under while late successional forests are being cut. The criteria for designating the LSMAs was based on the DRP that did not pass peer review.

L. **Global Climate Change**

The DEIS on pg 491 says that the nature of regional climate change over the next decade is speculative. The WOPR ignores the latest science on this issue and the latest forest management science regarding the value of natural forests as carbon sinks. Instead, BLM chooses to look backwards to their interpretation of the O&C Act of the 1930s that is outdated with regard to the latest forest and climate science. The fact that these late successional forests could provide a significant amount of long term carbon sequestration is not recognized or discussed.

IV. SCIENTIFIC INACCURACIES AND QUESTIONS

A. **Spotted Owl Recovery Plan**

The basis for much of the WOPR is the Spotted Owl Recovery Plan and the proposed critical habitat exemptions by the Fish and Wildlife Service. This reduces the importance of habitat of Spotted Owl survival and blames declining populations on the Barred Owl and other issues. Endangered species need specific habitat to survive. This draft plan did not pass scientific peer review. Independent peer reviews concluded that, "1)the recovery team failed to make use of the best available science and, in fact, appeared to have selectively cited from the available science to justify a reduction in habitat protection; (2) the primary issue threatening the continued persistence of the owl remains the loss of old growth habitat through logging that prompted the original listing; (3) too much emphasis was placed on the adverse effects of barred owl range expansion as a cause of the owl's continued decline; and (4) the proposed options are not supported by any reasonable interpretation of the best available scientific information." In other words, implementing WOPR would lower habitat protections guaranteed by the NWFP. The greatest loss would be in the Medford District.

B. **Models**

The WOPR uses models that show no significant impacts on fisheries and endangered species in spite of increased logging of late successional forests and reductions in stream buffer widths. The accuracy and use of these models for this purpose is to be questioned. There are overly optimistic assumptions about regeneration of trees in tree farms especially in Southern Oregon when they have a history of marginal success at best. The warming drier climate of Southern Oregon may not be conducive to timber production from tree farms.

X. ECONOMY

The Socio-Economic section was woefully inadequate because it focused only on county payments and the timber contribution. Other forest products and the growing tourist economy were not discussed or analyzed.

Many timber sales in Medford District have been "below cost" benefiting the timber industry at the expense of the taxpayer.

CONCLUSION

Scientific inaccuracies due to the dependence on data from the DRP, the Modeling issue and elimination of the ACS and The S/M (which have been upheld by the courts) could make this document subject to legal scrutiny. Transforming Southern Oregon into a vast tree farm will have negative consequences in the long term for fish, wildlife, vegetation, soils, tourists and Southern Oregon residents. This plan needs reconsideration. The NO ACTION Alternative is the only real choice as presented in this document.

A better alternative would focus on plantation thinning. This could fulfill the O&C requirements and provide a sustainable supply of timber while retain the last of the late successional forests and protecting and our streams and riparian areas.

Thank you for your consideration.

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