

THE MCKENZIE WATERSHED COUNCIL

"The river links us all"



December 21, 2007

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Edward W. Shepard, State Director
United States Department of Interior
Bureau of Land Management
Western Oregon Plan Revisions
P.O. Box 2965
Portland, Oregon 97208

Dear Mr. Shepard,

The McKenzie Watershed Council has reviewed the Draft Environmental Impact Statement (DEIS) for the Western Oregon Plan Revisions (WOPR) and would like to offer several observations and suggestions for further consideration. There is not unanimous Council member support for all of these comments, but the comments do reflect the general sentiment of the Council. In general, our comments relate to four aspects of the DEIS:

1. Riparian area management strategies would benefit from greater sensitivity to risk.
2. The costs associated with the spread of invasive species deserve special consideration.
3. As very important references for historic conditions, lands currently managed as Late Successional Reserves provide critical baselines for watershed restoration projects.
4. The DEIS should be reviewed by an independent scientific group.

It is the mission of the McKenzie Watershed Council to foster better stewardship of the McKenzie Watershed resources through voluntary partnerships and collaboration. Among other functions, the Council serves as an advisory body to established decision-making authorities and makes recommendations concerning the protection, restoration and enhancement of watershed resources. The Partners of the Council represent McKenzie Valley residents; recreational and commercial interests; water utilities; conservation groups; water consumers; and city, county, state and federal government agencies, including the Bureau of Land Management.

Riparian Area Management

The WOPR EIS proposes a selection of riparian area management zones, all of which are reductions in area from the current status (No Action Alternative). From the Council's perspective, the cumulative impacts in a watershed are distilled in stream and river water itself, and the riparian area is the most critical point to manage those impacts. For the McKenzie River these impacts influence a fish community that includes many aquatic species of concern,

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but also the drinking water for more than 200,000 residents of the Eugene-Springfield metropolitan area and communities upstream.

Council staff and volunteers regularly work in riparian area management and restoration projects to help maintain this high quality water resource and the fish populations it maintains. Based on that experience, we are concerned that the segregated analyses in the WOPR EIS of watershed impacts (sedimentation impacts, peak flows, the provision of woody debris, the loss of shade and subsequent heating of water and the introduction of pollutants via surface run-off) do not recognize the significant cumulative risks posed by increased harvest-related activity in these zones. The proposed riparian zone distances in each of the alternatives do not clearly factor in the risks associated with machinery and other operator errors, seasonal shifts in stream channels and the width of riparian zones in adjacent properties. Moreover, the models assume no large-scale disturbances and no global warming. We understand why the modelers made these assumptions, but we also expect that these events will occur. Because of these limitations and risks, we encourage the BLM to apply the precautionary principle when establishing riparian area management guidelines. The current guidelines' reliance on two site-specific tree heights is a good example of that principle in practice.

Invasive Species

The Council works regularly with landowners to prevent and control the spread of invasive plant species. The increased levels of forest activity among all of the proposed management alternatives will lead to increased spread of invasive species and possibly to increased levels of herbicide and other applications. Such results would be counterproductive to the efforts of watershed councils and many other entities.

Baseline Reference Conditions

The Late Successional Reserve forest lands currently provide good examples of reference condition when assessing ecological processes of structurally advanced forests. The loss of this reference condition as proposed in several of the alternatives is troubling from an adaptive management and research perspective. This is an area that deserves attention from an independent scientific review panel.

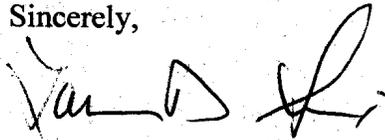
Independent Scientific Review

We commend the BLM staff for gathering and analyzing a lot of new data that were not available for the Northwest Forest Plan. Due to the complexities and limitations of the modeling, the likely importance of the impact analysis on the alternative selected and the controversial nature of the WOPR, it is important that the public be assured that there will be a comprehensive, independent scientific review of the DEIS. We understand that cooperating agencies have been providing informal technical comments on an ongoing basis, which is helpful. We also heard that BLM intends to ask a team of federal scientists to review the analyses. We urge you to conduct such a review, to include university and other scientists as appropriate and to make the public aware of this process and the results. Such a review might help answer many of the questions we've raised relative to the risks associated with different management scenarios and actions. Such a review would also likely lead to broader and more lasting public support for forest management alternatives that are ultimately applied on the ground.

Our goal is collaboration that leads to improved fish and wildlife habitat and water quality conditions across the watershed. That demands good communication and cooperation among all landowners. The BLM's O&C lands distribution brings it into contact with many landowners. We encourage you to explore partnership opportunities to ensure implementation across the entire landscape..

We look forward to continued cooperation on projects throughout the watershed and appreciate this chance to weigh in at this stage. Thank you for your attention to these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Six", written in a cursive style.

Larry Six
Executive Director