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January 11, 2008

RECEIVED  
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BLM  
WOPR OFFICE  
333 SW 1<sup>st</sup> Ave  
Portland, OR 97204

Dear BLM:

I am writing to express a multitude of concerns regarding the proposed Western Oregon Plan Revisions (WOPR).

Much of the **WOPR relies on the draft spotted owl recovery plan** and proposed critical habitat exemptions by the US Fish & Wildlife Service. **This recovery plan has recently failed scientific review**, partly because it would lower habitat protections for spotted owl. 1.5 million acres of critical habitat protected by the Northwest Forest Plan are now subject to loss due to an un-scientific recovery plan. I am particularly concerned by **recent testimony to the US House Natural Resources Committee** by a Dr Dominic DellaSala, member of the spotted owl recovery team who has indicated **high level political influences have corrupted** the attempts of respectable scientists to use **sound science** as a basis for the draft spotted owl recovery plan....upon which the WOPR is based as well.

<http://www.nccsp.org/files/land/spottedowltestimonydds.pdf>

- See Enclosed Doc

<http://www.nccsp.org/files/land/DDStestimonyHNRCconfidencehearing-July31-07.pdf>

Based on this information, **I hereby request the WOPR process be placed on hold** until **investigations of inappropriate political influence** are held to insure BLM decisions are based on sound science.

In addition, I think the origins of the WOPR are highly questionable. **This is a political "Sweetheart" settlement between timber interests and the Bush administration** for a legal conflict which would not hold up in a court of law. On this basis, **I hereby request he WOPR process be cancelled in its entirety.**

The **Northwest Forest Plan is landmark legislation** to protect the Ancient Forest Ecosystems which residents of the Pacific Northwest cherish as National Treasures. The **WOPR options 2 & 3 will fundamentally undermine these protections** and open the floodgates to future reductions in habitat protection, in a manner which will re-ignite the resource conflicts of the previous decade.

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I have numerous concerns regarding the following details of the WOPR:

- **AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACEC):**
  - **These areas should NOT be eliminated or reduced in acreage.** These are special places in which merit protection. The preferred alternative would eliminate or reduced protection and consideration for these areas which I value.
  
- **FIRE HAZARD AND SEVERITY:**
  - Fire is a natural feature of our landscape. The DEIS (pg 33) indicates all wildfires would be immediately suppressed. This is in direct conflict with the management objective to promote ecosystem function and resiliency.
  - The WOPR DEIS has used an overly broad definition of “Wildland Urban Interface” (WUI). Map 6 (DEIS pg 155) depicts most of the BLM project area within the WUI. The Oregon department of Forestry has identified a much smaller portion of the project area as WUI:  
<http://www.oregon.gov/ODF/FIRE/SB360/sb360.shtml>
  - The “Wildland Urban Interface” has no definition within the WOPR documents. WUI lands need to be correctly identified to direct limited resources where they are needed most and to **AVOID UNNECESSARY TREATMENTS.**
  - Additional issues regarding fire have been identified by the NCCSP:  
<http://www.nccsp.org/files/land/WOPR%20summary%2019oct2007%20update.pdf>
  
- **IMPACTS TO FISH, WATER & WILDLIFE**
  - The preferred alternative will have adverse effects on water quality. The drastic cuts to the aquatic reserve system and NWFPs Aquatic Conservation Strategy will increase the severity of impacts to streams already experiencing water quality problems.
  - Additional issues regarding Water have been identified by the NCCSP:  
<http://www.nccsp.org/files/land/WOPR%20summary%2019oct2007%20update.pdf>

See enclosed Doc



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**I have a multitude of concerns regarding WOPR proposed off-highway vehicle (OHV) emphasis areas:**

- **ANDERSON BUTTE PROPOSED OHV AREA**

This proposed OHV area has a multitude of issues, including:

- **Dakubedetede Wildland ACEC (Proposed BLM).**

This is one of the few remaining roadless areas left in Southern Oregon. The entire watershed had been nominated for wilderness status. **It would be reprehensible to turn this ecological treasure into an OHV area.**

- **Sterling Mine Ditch Trail ACEC**

This is a popular hiking trail. In winter it is one of the few trails snow free and is heavily used. The 75 foot buffer around this trail is ridiculously inadequate for quiet recreation. This trail should be managed to be free of preventable noise. **It would be reprehensible to turn this quiet recreation treasure into an OHV area.**

- **Wildlife Habitat**

Much of this proposed OHV area is located in winter elk and deer range which would be adversely affected by a high concentration of OHV use.

- **Water Quality & Erosion**

Anderson Butte has numerous 303d stream drainages and a history of landslides. A high concentration of OHV use will increase erosion and water quality issues.

- **The northern portion of this area is highly problematic and should not be managed for concentrated OHV use.**

- **THIS SOUTHERN 2/3 OF THIS AREA IS COMPLETELY INAPPROPRIATE AS AN OHV EMPHASIS AREA.**

- **THE DAKUBEDETEDE ACEC SHOULD BE PRESERVED AS WILDERNESS.**

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- **EAST HOWARD**

- The **Lily Glen Equestrian Center** is located in the northern portion of this OHV Area. The trails in this are heavily used by folk of all ages riding horses. **Encouraging OHV use anywhere near this horse facility is completely inappropriate.**
- The **Pacific Crest Trail** passes thru the southern extent of East Howard. This nationally appreciated hiking trail deserved protection from the impacts of OHV use. **The PC trail should not be turned into an OHV trail.**
- **Moon Prairie & Hoxie Creek ACECs** in this area should be protected from OHV use.
- **Hoxie Creek is a 303d stream** running thru the middle of this area. It drains **many acres of sensitive wetland** on adjacent private land. Encouraging OHV use would incur serious impacts from “mud boggers” etc. **This area should be protected from OHV use.**
- **OHV use is not appropriate for this proposed emphasis area.**

- **LAKE CREEK**

- **Lost Lake ACEC should not** be encouraged for OHV use.
- Much of this proposed area is drained by **Lake Creek** which is a **303d stream**. OHV use in this watershed will have an adverse affect on its water quality. **The Lake Creek watershed should not be emphasized for OHV use.**
- Most of this proposed are is in **Very Sensitive Wildlife Habit**. **This is prime Elk winter range**. Concentrated OHV use will have an adverse impact on the Elk population.
- **This area is inappropriate for concentrated OHV use and should not be managed as an OHV emphasis area.**

- **WORTHINGTON/OBENCHAIN**
  - **Round Top Butte ACEC** is in the middle of this area and **should not be emphasized for OHV use.**
  - **Poverty Flat ACEC** borders the North East corner of this area. **Adjacent BLM land should not be emphasized for OHV use.**
  - The **Nature Conservancy (TNC)** owns numerous parcels of land to the north of **Round Top Butte ACEC**. Encouraging heavy OHV use on adjacent BLM land will **increase the risk of adverse impacts to the habitat of threatened and endangered species** protected by TNC in the middle of this proposed OHV Area.
  - The entire proposed area is in **Very Sensitive Wildlife Habit. This is prime Elk winter range.** Concentrated OHV use will have an adverse impact on the Elk population.
  - **This area is inappropriate for concentrated OHV use and should not be managed as an OHV emphasis area.**
  
- **JOHNS PEAK**
  - **Long Gulch ACEC (BLM Proposed)** is located to the south of this popular OHV area. The land adjacent to this ACEC should be managed to prevent OHV use in this sensitive area.
  - The southern portion of this area is Sensitive Wildlife Habitat. OHV use in this area should be managed to minimize adverse impacts to wildlife.
  - There are numerous **303d streams** which drains the this area (Humbug Creek, Galls Creek, Jackson Creek, Forest Creek). In addition Foothills Creek and Kane Creek are sensitive waterbodies, all of which drain into **303d rivers**. OHV use has an adverse impact on the quality of this aquatic systems. OHV use in this area should managed to minimize &/or prevent adverse impacts to these sensitive streams. **If adverse impacts are significant, OHV use should be highly regulated or eliminated in sensitive watersheds.**
  - **Emergency Closure areas should be highly regulated or permanently closed.**
  - **OHV use in this area should be highly regulated to minimize the ongoing adverse impacts.**

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- **ELDERBERRY FLAT**
  - **This area should be managed for OHV use.**
  - **This should be done in a manner which minimizes impact to the 303d streams into which it drains, and minimize impacts to sensitive wildlife habitat.**
  
- **FERRIS GULCH**
  - **This area should be managed for OHV use.**
  - **This should be done in a manner which minimizes impact to the 303d streams into which it drains, and minimize impacts to sensitive wildlife habitat.**

Thank you for your consideration of the information provided above and my thoughts regarding the management of the **Public's** land managed by the BLM.

Sincerely,



Stephen C Duckworth