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NATIONAL PARK SERVICE
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

IN REPLY REFER TO:
A76(ORCA)

January 11, 2008



Tim Reuwsaat, District Manager
Bureau of Land Management
Medford District
3040 Biddle Road
Medford, OR 97504-4119

Dear Tim,

Thank you for providing the opportunity to comment on the BLM's Western Oregon Plan Revision. In general, this planning document is one of the most comprehensive and well-written ones we have seen. However, as required under NEPA, Oregon Caves National Monument should have been directly consulted as an "affected federal agency" before the final draft. Absent that consultation, we have some specific comments and questions prior to the end of the public comment period.

The No Action Alternative would have the least adverse impacts to species on the Monument in terms of air quality (smoke & CO₂), fire hazard and resiliency, soil disturbance (grazing & harvest), streams (large-wood, sedimentation & temperatures, non-native invasions, forest fragmentation, forest recovery from salvage logging, road and ORV trail density, edge effects, and global warming. Alternative 3 would be most detrimental to the Monument, for most of the same reasons, including the fact that it would result in the least acreage of ACECs (p. 809).

Under the section dealing with mineral extraction, there is no mention of the marble quarry adjacent to Monument. We assume that the quarry will continue to be withdrawn from mineral extraction under all alternatives.

Off Road Vehicles

Your planning document states that all alternatives would reduce the amount of area open to off-highway vehicle use. However, the document also states that under all alternatives, the off-highway vehicle opportunities would increase (page 777). Does this apparent contradiction mean that in the action alternatives, ORV areas would be better marked, publicized, or otherwise developed? The document suggests this but does not directly address the apparent contradiction.

Effects on Species

Extirpations of species on BLM administered lands from some of the listed impacts may lengthen stochastic extirpations on and in the Monument as a result of reduced migration. Given past anthropogenic extinctions in southern Oregon, some species have such narrow or narrowed ranges (one or two counties) that extinctions are likely to occur as well over a hundred year span.

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There are some actual or likely lepidopteran endemics to the Klamath-Siskiyou. Most have ranges more restricted geographically, have higher taxonomic status or smaller populations than those species assessed on p. 714, such as:

Whulge (Taylor's) checkerspot butterfly (southern range limit in Willamette Valley);
Callophrys polios (hoary elfin) (boreal Pacific NW from NWT to Rockies, disjuncts in sOR coast, AK, sRockies);
Oregon silverspot butterfly (near coastal southern limit), Fender's blue butterfly (endemic to Willamette Valley);
Insular blue butterfly (*Plebejus saepiolus insulanus*) possibly in Lane Co. near or at southern limit in range);
Chloealtis aspasma at the southern limit in Jackson Co. of its Benton Co. to sOR range;
Littorina subrotundata (= *Algamorda s.*; *A. newcombiana*) at the southern end of its OR to WA range.

The high biodiversity and endemism of species in caves in Oregon Caves National Monument suggests that certain BLM-managed caves in the Siskiyou may have similar biologic values that would qualify them to be nominated as significant under the Federal Cave Resources Protection Act, an authority not referenced in your document. Therefore, some non-listed species need to be assessed under environmental consequences, consistent with page 719 in which "special status species would be managed to avoid contributing to the need to list as threatened or endangered under the Endangered Species Act."

As with about ten beetle taxa, some of the taxa listed below are presently known only from Siskiyou County in California. These species might soon have a major portion of their range identified on Oregon BLM lands once comprehensive databases for Oregon are completed. Further, many of these species are likely to move northward due to climate change. Some of these species have already been documented over the past few years as appearing at Oregon Caves National Monument for the first time. Comparison with just one genus from the more comprehensive (Oregon and California) snail databases suggests that more pebblesnails should be evaluated than what are listed on page 715 and that beetles and lepidopterans with narrow ranges are almost as common in Josephine or Jackson counties as in Siskiyou Co. Larger lists could have been generated for beetles, snails, macrofungi, and dipterans and smaller lists could be compiled for many other taxa, such as the stonefly *Hydatophylax schuhi* (endemic to Klamaths in Jackson Co., & westernmost Great Basin in Klamath Co., Oregon) and the caddisfly *Rhyacophila colonus* endemic to Josephine & Del Norte Cos.).

Species listings should be reviewed by your exceptional staff of botanists before final publication of the plan to correct some typographical or misspelling errors as indicated in the following examples:

Volume 1 p. 20

Gentener's fritillary is misspelled and should be Gentner's fritillary

Fritillary gentneri is misspelled and should be *Fritillaria gentneri*

Castelleja is misspelled and should be *Castilleja levisecta*

Astaragalus applegatei is misspelled and should be *Astragalus applegatei*

Some statements in the plan should be revised to enhance clarity. We believe that the following statement could cause confusion:

“State listed species where the BLM has not entered into a conservation agreement and species listed by the BLM as sensitive or assessment species will be managed on public domain land and on O & C lands where protection does not conflict with sustained yield forest management in areas dedicated to timber production. This is so that special status designation would no longer be warranted and so that actions will not contribute to the need to list the species under the Endangered Species Act. Where conflicts with sustained yield management occur, protections on O & C lands will only be applied to prevent extinction of a species even if it is not yet listed under the Endangered Species Act”

The statement as written gives the impression that sustained yield forest management will help remove special status designation and such actions will not contribute to the need to list the species. Yet there is no evidence given that this would be the case. Also, preventing extinction needs to be better defined. Does this mean, for example, the likely elimination of a species from greater than 50% of its range?

To better understand ways to avoid plant extinctions, it would be useful to analyze species that likely were once within or close to the management areas covered by this document but which are now apparently extinct, such as *Neothremma siskiyou*, *Fluminicola* undescribed sp. (Frest & Hohannes, 1999) (endemic in Shasta River valley, Siskiyou Co.), *Plagiobothrys lamprocarpus* and *Calochortus indecorus*. The latter should be included even if it was considered a hybrid and not a true species.

Appendix G-1068 – Why is *Vespericola sierranus* listed as a species of concern? It is abundant in northern California. Does this document assume that species at the limit of their geographic range are of concern because they are more likely to be extirpated there than elsewhere? Several similar examples could be cited.

Effects of Climate Change

“The analysis assumes no change in climate conditions, because the specific nature of regional climate change over the next decades remains speculative”. We believe that any analysis that assumes no change in climate conditions is itself speculative. Global climate change has been identified as one of the greatest potential impacts to our National Parks and their natural and cultural resources. An increase in the average annual regional temperature is not just likely; it has already occurred. Increased temperatures could also result in significant changes to hydrologic processes, including reduced snow pack, earlier snowmelt, and shifting of the rain-on-snow zones. Some of these changes have already occurred.

There is no mention of the likely effects of increased atmospheric carbon dioxide on changing the carbon versus nitrogen ratio in plant biomass and the resulting effect on decomposition rates as cited in a recent USFS contracted paper.

Forest Management and Effects from Timber Harvest Activities

p. 564 – The assumption here is that fertilization would speed up growth but there are no cited references supporting that assertion. Several published studies indicate that the effect may be negated by adverse effects on ectomycorrhizae and aquatic animals. The document does not adequately discuss potentially antagonistic effects between mycorrhizae and fertilization and how that interaction may be important in assuring the survival of planted trees and enhancing the growth of desirable trees in harvested or disturbed areas

The assumption that “improved genetics” would increase tree growth also has no cited references. Several published articles suggest that “improved genetics” for faster growth may also make trees more vulnerable to insect and fungal infestations.

P. 494 – It is unlikely under most definitions of what defines “old forest” that the “patch size of mature and structurally complex forests” would increase across all ownerships under Alternative 3 if 63% is harvested in a century. This is likely to be especially true when on the same page where it is asserted that “On the BLM-administered lands, the size and connectivity of the patches of the mature and structurally complex forests would decrease in all provinces under Alternative 3.”

p. 510 – We recommend that you cite Daniel Sarr, NPS Klamath Network Inventory and Monitoring Coordinator, and others on the increase in salmonberry dominated areas in highly productive riparian areas in our region.

p. 557 - It would appear that the volume from thinning is highest under the No Action Alternative. If true then this alternative would be most likely to accelerate the attainment of a more natural mix of old growth and structurally complex forests.

Page 723 – We disagree with the assertion that none of the alternatives would result in increases in stream temperature that would affect fish habitat or populations, except under Alternatives 2 and 3. Federal key watershed analysis of the Sucker Creek drainage in Josephine County concluded that stream temperatures would increase due to Port Orford mortality in riparian areas as a result of Port Orford-Cedar rot. Further into the document, (p. 756) stream temperatures are analyzed to some extent, although Port Orford mortality was not taken into account.

Page 745 – We disagree with excluding dissolved oxygen “because their effects are site specific and have limited applicability to forest management” This needs to be reworded to say that there are only a few sites with such problems - if indeed this is the case (see comments on Port Orford mortality).

p. 749 – “This inconsequential stream lengthening would have no effect on the timing of runoff...” We believe this statement would be more accurate written as “This inconsequential stream lengthening would have no *measurable* effect on the timing of runoff”

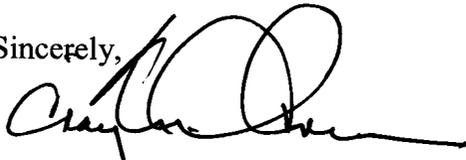
p. 775 – We disagree that sightseeing does not require recreation developments. Increased activity of this nature generally leads to requested or constructed improvements on roads and trails including but not limited to roadway enhancement, pullouts and overlooks.

p. 865 – The definition of sustained yield includes “without impairment of the productivity of the land”. In conjunction with other BLM goals and objectives, something should be said of biodiversity, as often the two are incompatible. We believe, biodiversity should be a goal, as well as the fish productivity stated on page 738, even if both goals cannot be maximized.

p. 866 – The term “recover potential mortality” is unclear and may not be understood by other agencies, cooperators or the public.

If you have any specific questions or desire clarification of these comments, please contact me or Natural Resource Specialist John E. Roth at 541-592-2100. The National Park Service looks forward to working with you on implementation of the final, selected alternative in a manner that will protect Monument resources and benefit our shared stakeholders and owner public.

Sincerely,

A handwritten signature in black ink, appearing to read 'Craig W. Ackerman', written over a horizontal line.

Craig W. Ackerman
Superintendent