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Bureau of Land Management
Western Oregon Plan Revisions Office
333 SW 1st. Avenue Portland, OR 97204
P.O. Box 2965 Portland, OR 97208

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CC: Oregon Congressional delegation

January 8, 2008

Dear Bureau of Land Management,

Although I have worked for federal and state land management agencies for more than 20 years (including the past twelve years at BLM), *I am writing this letter as a private citizen.* I have also owned, managed, and lived on forest land adjacent to BLM for over 20 years. Over an even greater span of time, I have walked, bicycled, skied, rafted, and been generally inspired by the local landscape managed by the agency. I feel that I have a strong personal as well as professional stake in the management of these lands.

In spite of my 20+ years as a field technician in recreation, silviculture, fisheries, and wildlife, I realize that I'm not the most qualified person to give "substantive comments" on the very complex draft proposals in the Western Oregon Plan Revision. I had hoped that the input from agency specialists along with outside experts would have been given serious consideration. When I heard a believable rumor that the Medford District BLM had "filtered out" the comments from its own professional wildlife biologists in the District's input to the WOPR committee, I began to wonder whether citizens' comments would even be looked at. Nevertheless, here are a few of mine, without reference to internal agency information.

In general:

While the *Northwest Forest Plan* has had its drawbacks, I find it (aka the No Action Alternative) preferable to any of the proposed Action Alternatives in the draft Western Oregon Plan Revision.

The WOPR lumps a large diverse area into one Land Management Plan making only a few concessions to the significant differences in climate, terrain, and plant & animal species diversity between Medford District and those Districts to the north, let alone between resource areas on the Medford District. A one-size-fits-all management plan cannot adequately address the needs of such diverse areas.

All of the three action alternatives rely on the questionable interpretation of the O&C Act that timber as "dominant use" means timber as *sole* use, with exceptions made only for the minimum required-by-law mitigations for listed Threatened & Endangered species.

None of the three action alternatives offer adequate protections for streams, wildlife, or botanical diversity.

In specific:

Timber management in all three action alternatives relies on intensive regeneration harvesting that retains few to no green trees or commercial-sized snags. The "principles of sustained yield" alluded to in the O&C Act do not have to mean immediate stand replacements. Refocusing on the selective thinning of small diameter trees, while retaining larger more fire-resistant trees as well as snags, would meet many forest management objectives including wood products, increased fire resiliency, and wildlife habitat.

While justifying greatly reduced riparian management areas based on water temperature data, little importance is given to the many non-special status wildlife species that are aquatic/riparian-associated, in that they depend on riparian corridors for travel, water, and thermal-regulation in the hot & dry summers of Southwest Oregon. I would like to see reasonable-width riparian management areas with adequate canopy requirements maintained on all streams, perennial and intermittent, whether fish-bearing or not. These protection areas do not preclude careful harvest activity, but this is a decision better made on a local level. Small streams as well as large are critical elements of the landscape in Southern Oregon.

Plans to aid the survival and recovery of the Northern Spotted Owl and associated species are based on the highly disputed USFWS draft Recovery Plan for the NSO. No indications are given in the draft WOPR as to potential adjustments that might be made should the draft Recovery Plan be rewritten or greatly revised.

I am concerned about eliminating Areas of Critical Environmental Concern simply because there is also the potential for timber harvest. ACECs are vital for preserving certain fragile plant populations in the patchy habitats of southern Oregon. Likewise I am concerned that potential wilderness areas are being dismissed simply because they contain harvestable O&C lands.

I applaud the plans to contain Off Highway Vehicle use to designated trails & roads, as I have seen (& heard) the detrimental impacts of unregulated use.

In conclusion:

I would like to see a completely new management plan alternative developed for Southern Oregon, which will more closely reflect the local ecological as well as community concerns and issues. It is apparent that financial returns from harvests on O&C lands are never going to be adequate to run our Counties. I would therefore like to see a more balanced approach to land management that will sustain forest *habitat* while allowing for some "yield" primarily through smaller diameter thinnings.

While it is understandably beyond the immediate task at hand, I can't help but conclude that there needs to be another hard look taken at the O&C Act and at the 2003 settlement agreement that has precipitated some of the drastic land management changes proposed in the draft WOPR. In spite of community workshops, this is a document guaranteed to confuse and polarize communities.

Sincerely,

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