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Plan Revisions
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*(Name on pg 10)

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Thank you for the opportunity to comment on BLM plan to revise management plans to O&C lands. Having read most of the 3 volumes, I believe the need & purpose of proposed revision, and BLM's choice of Alt. 2 shows a clear cut allegence to the timbir industry. Someone has omitted the watershed protection, stream flow regulation requirements of this 1937 act when interpreting this law during the recent lawsuit between AFRC vs. BLM. I cannot understand how the words "sustainable yield" equate to mean clear cut the forest and move on to the next. Since it would take centuries to replace these 200+ year old trees, how can that be called sustainable? How many clear-cuts on BLM land, within the planning area, have returned to a productive condition, and how many have turned into sites that will never be productive again. I see all around the Rogue Valley, BLM lands that contain scrub oaks, manzanita, and buck brush. Why can't the forests grow there as they once did? Permanent forest production means keeping as much established vegetation as possible and taking only what is extra. This is like a bank account that earns interest. Keep the resource intact and harvest the extra. The O&C act allowed 500 mmBF per year from all lands, but your plan far exceeds that total and will cause extreme degradation of watersheds, streams, wildlife habitate, and quality of life.

I would support harvest methods that care more about the condition of forests rather than short term incomes. Alt. #2 is so shortsighted towards consequences, and mimicks commercial tomber methods one could assume the BLM is the same as the tomber industry. I would choose the no Action Alt. but with

a sub-Alt. that harvests trees 80 years & younger
the following notes refer to volume and page number;
vol 1 pg 1- Information amongst the many pages of this DEIS
show fire resiliency decreases when older forests are
harvested. Also there is noway to speed the
redevelopment of structuarlly complex forest after
regeneration, (I will start calling this what is really is)
clear cut harvesting, other than allowing the same time
it took to grow these ancient forest to pass.
vol 1 pg xxxix - If public comment played an important role in
shaping the alternatives, how willing is the BLM to
listen what the public is saying now: LEAVE OLD GROWTH
FORESTS ALONE!!! If after this process, the BLM
goes with the heavy handed ALT #2, the next step for
the public should be to go to congress and amend
this act. I have much hope that the congress will
agree with public opinion and work towards better
environmental stewardship, that can produce timber,
protect watersheds, streams, and wildlife habitat.
I believe our forest contribute to global cooling,
drinking water & pollution absorbtion. In a global world
where pollution credits are a new strataigy, our
O & C counties could be paid for keeping old & growing new
forests. I call it Oxygen & carbon credits. (anyway, it's
a thought!)
vol 1 pg XLVI - ALT #2 leaves no green tree retention
" " LII - If no action ALT is choosen, how can the BLM say 3,770
jobs would be lost?
" 1 pg LXI - How can BLM predict that only 4, out of 1,071
watersheds, would be susceptible to peak flows?
(lets remember, O.S.U. ok'd a clearcut on their
forest that caused a mudslide & flooding which caused
high dollar damage). Also up in Washington from a

clear-cut on Weyerhauser timberlands.)

vol 1 pg LXIII - How can BLM adopt Alt 2 and claim it improves the quality of visitor experiences?

vol - pg 3 - Congress may have mandated timber production as dominant use, but not exclusive. It also called for watershed protection.

" pg 29 - Are stream flows & watershed protection an important management objective?

" pg 64 - BLM has interpreted it's statutory mission & responsibilities to harvest as much as the private timberlands and ignore protecting watersheds. Also further in this DEIS - Alt #2 shows not reduced fire hazards, but an increase.

pg 65 - How can a spotted out understand he must leave old growth forests and wait 100+ years for blocks of habitat to recover?

vol 1 pg 73 - Does the BLM understand what makes soils enriched? Why do people add compost to there garden? Taking trees killed from disturbances interupts the whole process of decomposing & enriching the forest floor.

vol 1 pg 109 - The repeal or change to the O&C Act can be changed only by congress. Does the BLM want this to happen? We are headed towards a pro-environment time and it would be nice to see BLM respond to the public instead of being forced by new laws.

vol 1 pg 113 - Alt #2 REDUCES RESILIENCY, & increases fire hazard & severity. (this contradicts BLM opening statements)

vol 1 pg 358 - Stream Flow - As required by O&C, protecting against high flows & fast run offs is a function of old growth forests. Clear cuts increase run offs & erode spawning beds, cause erosion - a long term problem.

vol II pg 476 - ..." it is asummed that other federal & state

VOL II pg 476 (cont.) agencies would continue implementations of their current plans as written." Didn't president Bush take money away from recreational budgets and put it all into funding timber sales several months ago? This decreases habitat even more.

" pg 479 - BLM's plan to redesignate spotted owl habitat should be put on hold because it was reported that a political appointee (ms. Goodwin?) interfered with science findings and a new study was asked for (again)

pg 494 - size & connectivity of mature patches & structurally complex forests would increase under N.A. alternative & decrease in most provinces under #1 & 2, and decrease in all provinces under alt. 3 in 100 years. this contradicts statement, " on BLM administered lands, in 100 years, the abundance of (#4) structurally complex forests would increase under all 4 alternatives". "across all ownerships, patch size would increase". Does that include private tree plantations with 40 year rotation harvest cycles?

" pg 497 - "Stands under N.A. & #3 ALT's. would develop into structurally complex forests in 80 years." I thought trees over 200+ years are in this classification

" II pg 501 - "extensive forest management would likely take several centuries for BLM lands to return to historic conditions". (Long term rehab. due to short term gains.

" pg 509 "by 2106 83, 96, 100, & 91% of existing old growth that will be harvested. ALT. #2 takes 100% of existing old growth. Contradicts opening statements by BLM

" pg 558 - "these retention trees would reduce growth of the subsequent stand." this contradicts the claim that retention trees speed up growth of new trees.

" pg 559 - graph shows extremely high harvest rates.

01 # pg 572 - Graph shows clear cuts of 200+ year old trees alt 2 means BLM is back to business as usual (clear cut management.)

" pg 600 - possible 3330 miles of new roads

" pg 631 - Alt 2 - "would greatly contribute to invasive plant species." A long-term and costly consequence.

" pg 633 - BLM uses phrase "over-time" way to often as a way to mitigate wildlife effects, and to put best "spin" on arguments for clear-cut logging.

pg 634 " management actions may make landscape more or less vulnerable to catastrophic wildfires." - Graph shows Alt #2 increases vulnerability.

pg 637 alt. 2 "would decrease habitat 50-100 years resulting in overall decrease from current conditions."

" 638 "Declines in marbled murrelet habitat are caused by increase in the amount of lands being harvested"

pg 679 "decline of 3,000 acres equals 30% of resting habitat.

pg 680 "Short term decline of habitat could depress population abundance to a level from which they may never recover. (Long term problem due to aggresive RMPs.)

" pg 682 * "potential nest predation increases with increased forest fragmentation." Can we assume this can happen between barred owl & spotted owl?

pg. 689 - "stable thermal conditions and summer thermal habitat are found in older complex forests." This is so important because it shows how trees effect on micro-climates.

" pg 731 fish need cooler water temps for ideal spawning and survival. There is no reason to assume removing larger trees close to streams would help.

" pg 734 " Secondary shade zones would decrease effective shade by 10-20% & would result in a 1° rise in temperature per mile." No matter how small of a

percentage of planning area this effects, does not justify the practice.

" # pg 748 - " Site specific information regarding streams types, existing fisheries habitat needs to be analyzed" (good idea)

pg 759 - "New road construction per each alternatives could contribute fine sediment delivery over the next 10 years". What does that mean for drinking water & fish habitat?

" pg 769 Alt. #2 "would maintain high severity fire acres for the next 100 years." (~~contradic~~ a contradiction)

" pg. 771 Figure 274 shows increase fire resiliency under the N.A. alt. "the greater the canopy retained, the less influence wind has on surface fire"

pg 772 - Alt #2 has greatest reduction in fire resliency.

pg 783 - "No changes would be measurable enough to influence visitor use patterns" I never heard a visitor remark that they like seeing clear cuts.

" pg 787 - "N.A. Alt would maintain most wilderness characteristics" seems that would be under recreational opportunities - tourism is a huge industry

" pg 791 - Clear cut harvests would diminish existing visual resource quality. (there goes tourism!)

pg 794 - "Soil compaction reduces tree growth. A tree growing in compacted soil could take 8 years longer to reach the size of same age tree growing in non-compacted soil. For most soils & climates, soil compaction and displacement will reduce tree growth." The BLM should return to harvested sites with compacted soil and study the recovery of tree growth.

pg 796 - "Little is known about long-term effects of mechanically treating vegetation for site prep. or fuels reduction on soils." poor soils mean poor regrowth.

01 III

pg A-933 Sec. 209(c)(1-9) weigh Long-term benifits to the public against short term benefits.
I believe extreme levels of clear cuts would bring huge short-term income for the timber industry. It is wrong to assume a 1937 law/act still contributes to counties, as back then, to what counties need now. The population has increased many times over what they had back then. We would have long term degradation with forest production, watershed conditions, & habitat conditions as a consequence

pg A-934 Safe drinking water act: "Amended in 1996 establish a direct connection between safe drinking water and watershed protection and management". (We all live downstream.)

pg B-946 "Ivmp - interprets areal photos, Landsat uses scenes that are 11 years old." Can current conditions still be the same?

" B-948 Climate conditions "have changed and are continuing to change at a rapid rate." How can BLM predict forest growth and recovery rates? Scientists agree global warming will cause hardships of unknown magnitudes. This could cause reforestation efforts to fail.

C-957 assumptions about future prices & labor are assesed at 2005 levels". Experts are warning of a housing slump well into and through 2010. I believe BLM is using too high of figures.

C-958 "The O & C act require timber to be sold at Fair market value". Current timber prices are falling and are likely to remain low during housing slump. Old growth forests & ecosystems could face unnecessary

1 III Pg C-958 cont. degradation long-term, with very little economic gain.

pg C-963 - $159/mbf seems a bit of a stretch to assume timber now a days would sell for.

pg D-967 - analytical assumptions; prices & costs based on 2005 figures." NOT current, out of date

D-970 - weighted pond values based on old, 2005 dollars for 10 year estimate of value, stumpage & reciepts." Why use old values for next 10 year estimates? Seems a bit misleading.

D-972 - 10 year scenario is a simulation. Any computer modeling etc, can be fed innacurate data, or omit unintended consequences to create a perfect justification to harvest anywhere at anytime!

1 pg F-103 - Invasive plant species explode onto the scene when clear-cuts disrupt soils or shade is removed. Oregon spent $1 million fighting a yellow broom infestation due to Logging.
How can RMP's ignore costs of long-term rehabilitation to watersheds? Under-assumed, or unintended consequences can cost state & counties more dollars than what came in from harvest reciepts.

1 III pg E-1043 - It has been stated the Northern spotted owl is an indicator species. It's health is directly tuned to old growth forests. Under Alt. #2 habitat would decline by 49% by 2016; 8 years from now. That is a lot of old growth destruction. "Only 12 of 51 units would be able to support this specie. The remaining 33 sites would decrease available habitat during the next 100 years". How can BLM

01 III
pg 1043 con't. Follow E.S.A. with such an outrageous harvest levels? (all out, except N.A.)

01 III
Q-1524- "all measured site data for all species & base age was converted to a Douglas fir, 50 year base." this may work well for computer modeling, but shouldn't be takin as absolute truth when figuring FOI's.

Q 1531,32 areal photos show fragmented conditions from past clear cut logging. In spite of repeated protests from the public, Rmp's are perpetuating the practice, but also the degradation of our watersheds, recreational quality and erosion from high stream flow.

Q 1541- applying chemical fertilizer in watersheds pollute the groundwater and soils.
Silver culture of all the same specie and age is no substitute for the diversity of plants and wildlife in old growth ecosystems.

Q 1548 "partial cutting has been reported to significantly increase wind damage. Too much harvesting exceeds what the forest can tolerate.

I will end with asking you to please update your thinking to the 21st century. We have a potential, life-changing problem ahead due to global warming. Our old-growth ecosystems can help fight this problem.
We really don't know what we've got... until it's gone.
Take care & thanks for your time.

Turn over

over

my name is Barbara Ann Velasquez
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P.S. after the 1991 East Evans Creek fire
I planted 1,500 Doug fir &
1,000 ponderosa pine.

they grew beautifully until the summer of 2000
I lost all the pine, and all but 27 of the
fir trees due to drought.
I guess reforestation isn't as easy as
it sounds. I now collect cedar seeds
and broadcast them over my 10 acres.
they are 4-6" tall now!