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Gentlepersons;

I am a resident of Jackson County, Oregon. I chose to move here 4 years ago because of the BLM lands in the neighborhood. I have studied the BLM's draft management proposals and wish to make the following comments.

The O and C Act

The BLM is contending that the provisions of the O and C Act "ties their hands", and that they are required to begin clearcutting the O and C lands. Actually, the O and C Act calls for sustainable forestry. This mandate continues today, although our ideas about what constitutes true sustainability continue to evolve.

The terms of the settlement with industry require BLM to CONSIDER a management alternative which maximizes timber harvest. It is surprising that this alternative has been selected as the preferred alternative. Public sentiment clearly supports a variety of uses of our public lands.

In addition, the recent Northwest Forest Plan was based on the best available research. BLM's contention that new research makes that plan unnecessary or outdated is simply not supported.

The fact that BLM has not succeeded in selling the volume of timber allowed under the NW Forest Plan does not indicate that the Plan is flawed. BLM needs to examine where the road blocks are which are preventing it from offering a sustainable level of harvest as anticipated under the Plan.

BLM should develop an alternative which preserves more of the Northwest Forest Plan.

Riparian Buffers

Sustainable forestry means sustaining the landscape that supports the forest. That includes healthy riparian areas and associated life. The DEIS actually states that the Preferred Alternative will extinguish native wildlife in many riparian areas, due to the decrease in riparian buffers. This is a shocking and

completely unacceptable provision.

Riparian buffers should be maintained at present levels.

Harvest Method

The proposal to return to clearcutting (a.k.a. regeneration harvest), is another giant step backwards. Leaving some green trees after logging provides a reservoir of healthy soil and microorganisms which can radiate out into the cut-over lands. It provides some shade and protection from the drying sun. It reduces erosion during rain storms, and jump starts the recovery of the forest ecosystem. It retains important structural diversity, and can help reduce the threat of wildfire.

Uneven aged management provides many important benefits. Clearcutting should NOT be the standard treatment on public timberlands.

OHV's

The advent of OHV's has presented a new challenge to BLM's recreation managers. The expansion of "Limited Use" designation will at least finally give BLM legal authority to manage this recreation use of our lands.

However, the list of areas proposed for intensive OHV use includes many that are extremely valuable to wildlife. The Worthington/Obenchain, Salt Creek, and Lake Creek areas are important wintering ground for deer and elk. These areas are also within the Little Butte Creek watershed, an important spawning and rearing area for salmon and steelhead. Much of the terrain is gently sloping, open oak woodland, whose soft native meadows seem to invite trespass and "mudbogging".

The soil on the east side of the Rogue Valley where these areas are located is of a highly erodible type. OHV use has already created severe erosion problems which BLM has no funding to repair. Gullies and ruts already make hiking, biking and horseback riding difficult to dangerous in my neighborhood public lands.

**** This OHV-caused damage should be fixed before more OHV use is encouraged.**

The Worthington/Obenchain, Salt Creek, and Lake Creek areas are more important providing other values to the public, particularly the production of fish and wildlife. Their proximity to urban areas makes them attractive to all recreationists, not just motorized users.

****These areas should be eliminated from further consideration for OHV
Emphasis.**