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BLM WOPR Planning Staff  
333 SW First Avenue  
Portland, OR 97208

1014 Black Oak Drive  
Medford, OR 97504  
January 4, 2008

Dear Planners:

Please consider this my official comment on the proposed plan revisions for BLM lands in western Oregon.

First and foremost, your planning assumption of climate stability is fatally flawed. You cannot assume "no change in climate conditions" for the purposes of designing your action alternatives. It is clear by now that, whatever the cause, global warming is in progress and must be taken into account. Ignoring it because we don't yet know exactly how it is going to impact our western Oregon forests is an unacceptable response. Many experts have warned that we are likely to be facing much more frequent and more intense wildfires, and from southern California to the boreal forests, it seems we are already getting a taste of that. Snowpacks less than normal or which melt off more rapidly, and higher summer temperatures, may well reduce the growth rate of replantings; insects and disease that were formerly held in check by cold winters may thrive in a changed regime. Even the additional amounts of carbon dioxide, considered a likely boon to plant growth, have been studied experimentally and the assumption found to be at least questionable, especially over the long term.

In a recent speech to forestry students, Dr. Jerry Franklin warned that the 21st century is going to be one of great environmental uncertainty. Our forests' best chance of sustainability (the one timber-management requirement of the O & C Act) is to be managed for resiliency. Resiliency is promoted by diversity, both of age/size and of species. This will not be met by any of the action alternatives. Those (1 and 2) which prescribe clear-cutting of old-growth and no green-tree retention in clearcuts are the least sustainable of all.

There should be no cutting of old growth. Those ecosystems are rare, they are vital, and even supposing that you can develop "structurally complex" forests afterward (and in a time of great climate uncertainty this is highly speculative), it will be gone for the lifetime of the animals that depend on it, the water quality that it once provided, and the humans who cherish it. It takes 80 years to grow an 80-year-old tree. That's if conditions allow it to get that old - recall that the new trees on salvaged and replanted areas of the 1987 Silver Fire burned up, most completely and intensely, 15 years later when the Biscuit Fire came through. Having to completely restock a plantation every 15 years, and you need to give full weight to that possibility, will not yield a structurally complex forest, or even an 80-year-old tree farm, in 80 years.

Do not base your treatment plans on the rules changes (e.g. for critical habitat or aquatic protections) developed by the Bush administration. The courts have struck many of them down and others are likely to be rejected as well. Spotted owl, snowy plover, and murrelet habitat should at a minimum be assumed to continue under the former protections and the size of riparian zones should not be diminished. Those buffers are vital, especially in the steep slopes and friable soils of southwest Oregon. As it is, the rainy-season Coquille River runs the color and consistency of chocolate milk where logging has cleared the slopes along Hwy 42.

Restrict logging to much-needed thinning operations in previously-logged BLM forests. The Forest Service has been able to reach virtually its entire cut here this year, without legal challenge, because they were cutting what needed to be removed for actual forest health. Plans being developed by the Klamath Tribes with the assistance of Dr. Jerry Franklin would restore the forests of their former reservation by doing 10 years of extensive thinning while the rest of the forest grew into the conditions of ecosystem health that obtained prior to Termination. (Whether or not they get to put the plans into practice is not yet clear.) The BLM could follow these management practices on their lands without failing the O&C requirements, and without spending so much time in the courtroom.

Timber salvage and replanting in case of wildfire should be very limited, perhaps to hazard trees and areas so burned that legacy seeds, burls, and rootstock did not survive; certainly away from riparian zones, and with the lightest methods possible. The Donato study, and others, demonstrate that salvage following natural disturbances tends to add insult to injury, increasing damage and setting back recovery. The travesty of the Biscuit salvage set back the recovery that had already begun within a year of the fire, cost the taxpayers millions, and damaged the credibility of the agencies. Give nature a chance to heal things up. The ten-year examination of conditions on NWFP lands seems to show that it works.

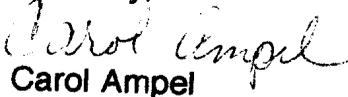
There is too much BLM land being reserved to OHV use. The Medford District has 8 proposed OHV areas; after examining the aspects of all of them, Commissioner Gilmour has identified only 3 that are acceptable as places where OHV use will not impact private neighbors or important wildlife areas, or that are relatively safe from the threat of accidentally caused wildfire: Elderberry Flat, Salt Creek, and Ferris Gulch. BLM officials have said that the goal is to limit the use of OHVs in sensitive areas, but designating riding trails has a tendency to bring in even more riders, not all of them likely to restrict themselves to the designated area, and by the admission of BLM people themselves, there is not enough funding to monitor and enforce the amount of landscape involved.

Stream sedimentation, wildlife disturbance, the potential for accidental wildfire ignition, and disruption of quiet recreation all come with even the most law-abiding OHV use. The BLM should be promoting quiet recreation, not opening thousands of acres to damage, pollution, and increased greenhouse emissions.

My preferred alternative is No-Action, with restriction on clear-cutting, and no cutting of old growth. Timber salvage should be highly restricted. OHV use should be restricted and enforced.

Thank you for this opportunity to comment.

Sincerely,

  
Carol Ampel