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The Takilma Community Association

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To: Bureau of Land Management (BLM)
Western Oregon Plan Revisions Office
333 SW 1st. Avenue Portland, Oregon 97208

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Re: Draft Environmental Statement for the
Western Oregon Plan Revision (WOPR)

Date: January 8, 2007

Introduction

The Takilma Community Association (TCA) is a 33 year old non-profit organization that serves the Takilma area as a general purpose neighborhood organization. The TCA sponsors community service projects, acts as a community forum and holds property in trust for the community. The TCA elects officers and board members from the Takilma Community.

Takilma is virtually surrounded by federal lands and Takilma citizens take an active interest in the nearby federal forests. Takilma and its roughly 400 residents are squarely in the "Rural Interface". For this reason, the TCA has a long history of dealing with Forest Service and BLM forest issues. WOPR appears to be a major one that has the potential to reshape BLM management in Josephine County, the Illinois Valley and in Takilma.

The TCA's area of concern is predominantly the Takilma area roughly defined as that part of the upper East Fork Illinois Valley nominally south of Waldo/ Happy Camp Road. In fact, BLM forests to the north of this line are important to Takilma residents. Moreover, no community is an "island" and BLM forest policies in all of Josephine County have the potential to effect Takilma residents and our neighborhood.

What's wrong with the WOPR, a general critique

Many of the general premises and choices in the DEIS will affect in a very specific way the TCA areas of concern.

- **Old Tree and Old Growth logging** – Much of the older forest on federal (including BLM) forest lands in the Grants Pass Resource Area of the Medford District have been logged and converted to younger forests. At the same time, fire suppression has, in some areas, created a surplus of young trees. For ecological, tourism and quality of life issues, the TCA believes that it is good federal forest policy to retain the residual stands and old trees and confine timber harvest to younger stands and trees.

A method of doing this is by using diameter as a rough surrogate for tree age and imposing diameter limits.

Unfortunately, the WOPR alternatives show that the BLM wants to ramp up the harvest of older forests and trees. For example, Alternative 2 (see graph on page 572 of the DEIS) shows that BLM plans to log the majority of the volume from trees older than 80 years with the age class of trees over 200 years in age contributing the most.

- **Clearcutting** – Clearcutting (aka "regeneration harvest with no green tree retention") will increase from present levels under the WOPR alternatives. The "preferred" Alternative 2 proposes clearcutting for almost all the harvest in the Medford District (see graph on p. 578 of the DEIS).

Clearcutting robs the forest of habitat for the animals most needing protection; those that require older and/ or shadier forests. Clearcutting also can cause soil and water problems that can ultimately degrade fish habitat and cause regeneration problems. Additionally, clearcutting detracts from natural scenery and other quality of life values and undermines economic growth based on tourism and quality of life amenities. Regenerated, even-aged stands of trees are also the most susceptible to wildfire.

- **Unsustainable Logging Volume** – The WOPR alternatives will increase the volume of saw logs coming out of the BLM forests by a factor of 2 to over 3 for the entire WOPR planning area. For example, for the Preferred Alternative 2, the “allowable sale quantity” increases over 3 fold --- from about 250 mmbf to about 710 mmbf (see graph on p. 559 of the DEIS). This type of increase may not be sustainable and may cause environmental and economic problems. A conservative approach to increasing sale volume would be an incremental one with close environmental and economic monitoring to adjust for any environmental impacts and unintended economic consequences. The economies of the WOPR planning area were once too heavily reliant on a very volatile timber industry. Since the inception of the Northwest Forest Plan, many local economies of this region have, by necessity, diversified. To suddenly “beef up” the timber industry in a way that is not sustainable may be a step backwards to the old “boom or bust” cycles that characterized the economies during the era of timber industry dependence.

- **Reduced Stream Buffers** – Action Alternatives all reduce the width and resultantly reduce the area of the “Riparian Reserve” buffers that are the most important component of the Aquatic Management Strategy of the Northwest Forest Plan. These buffers contribute to in-stream wood, stream shade and water temperature, soil stability, terrestrial wildlife habitat and more. They can buffer from inputs of sediment contributed by natural and management induced debris flows. In Alternative 2, the buffer area is reduced to less than one quarter of the default acreage now allocated (see figure 253, page 728 in the WOPR DEIS).

This reduction of buffer width will dramatically effect wildlife, fish and recreation values and damage the tourism and “quality of life” related economies.

- **The Illinois Valley economy, WOPR and Quality of Life Issues** – The premise of this bullet point is simple. The Illinois Valley has a struggling economy and is one of the more economically impoverished areas covered by the WOPR. (County statistics on Table 166, page 556 of the WOPR DEIS support this). The brightest hope of the Illinois Valley economy lies in the growing economies of outdoor (eco) tourism, residential development and the supporting service industries and small, “foot loose” business.

Outdoor recreation opportunities, scenic vistas, open space – these are all parts of the Illinois Valley “infrastructure” that is an integral part of the tourism, retirement and “footloose business” economies. BLM lands, to the extent that they are in a natural condition, are a very important part of this Illinois Valley infrastructure. But the increased logging, clearcutting, big tree logging and logging of riparian areas (narrower buffers) all damage the infrastructure – at a time when we need more, not less.

Restoration thinning of smaller trees can be compatible with the tourism, quality of life economies but the alternatives emphasize a very different approach that will benefit only a timber economy and only on a short term basis. Overall, the TCA sees WOPR alternatives and, particularly, the preferred alternative 2 as bad for business for the Illinois Valley.

- **ORVs and the WOPR** – BLM is using the WOPR environmental process to produce a plan for ORV use in the WOPR planning area. One of the strategies is to designate ORV “playgrounds” for ORV users on BLM lands. The BLM alternatives increase designated ORV areas and the increase is dramatic (4 fold; see page 776 of WOPR DEIS) in the Medford District (using the Preferred Alternative 2 as an example).

The WOPR alternative 2 proposal is so radical and controversial that it should not be considered in this economic analysis. The idea of designating 13 ORV emphasis areas in the Medford District could drastically change the recreational environment and ecology of the district.

- **Takilma and the WOPR** – The TCA is primarily concerned with the greater Takilma area. Yet all the above mentioned issues will directly affect Takilma and its residents. Older tree logging, increased regeneration / clearcut logging, reduced stream buffers will all add to a degradation of quality of life for Takilma residents and visitors and will consequently impact, in a negative way, our local economy.

What's Right about the WOPR

The TCA is pleased that the BLM, in the WOPR review, has recommended the establishment of the nominated Waldo-Takilma ACEC. (Page M-1321; WOPR DEIS). Such an allocation will maintain wildlife and plant habitat and populations and allow connectivity between the Waldo-Takilma and French Flat ACECs. Additionally, but importantly, such a recommendation will maintain the scenic amenities and recreational opportunities of Takilma residents.

There is a serious shortcoming in the ACEC proposal regarding the boundaries (as best we can determine them from the WOPR maps showing “administratively withdrawn” areas). Some nominated ACEC areas -- in sections 26 & 36 (T40S, R05E) on the slopes of Hope Mountain; in Section 3 (T41S, R05E) on the saddle between Scotch and Cedar Gulches; and in Section 10 (T41S: R05E) on the east side of Takilma Rd. across from Long Gulch --- were evidently not included in the recommendation. These areas are as worthy as the recommended ones and their inclusion will strengthen the ACEC in retaining its outstandingly remarkable ecological and historical attributes. (These are Public Domain lands not subject to the O&C act).

TCA recommendations

The TCA recommends:

- the BLM refine the Waldo – Takilma boundaries to include the above described lands.
- the BLM adopt a management regime that retains old and large trees and only allows logging of old and large trees in exceptional circumstances.
- the BLM emphasized logging of small diameter trees mainly from existing plantations and from very dense natural stands.
- thinning of forests rather than regeneration harvest.
- Retaining the full width (one site tree length each side) Riparian Reserves. Small, young trees can possibly be harvested from such reserves.
- no logging or roadbuilding in what is popularly described as the Zane Grey area along the Rogue River.
- OHVs be prohibited from going off of roads or designated (to motorized use) trails and that a separate EIS be commenced to deal with OHV use.

- the BLM conduct restoration activities in the Takilma area. Such projects could have a commercial by-product but should be non-exploitive of natural resources. After a period of time, trust will develop between BLM and the Takilma public.

Thank you very much for the opportunity to comment.

The Board of Directors of the Takilma Community Association.

Signed: Beth Peterson (President)

A handwritten signature in cursive script that reads "Beth Peterson".