

#	Name of Commentor	#	Name of Commentor	#	Name of Commentor
1	Gerald F. Jeli	29	Lydia Garvey	57	Vasiliki P. and Paul Jr. L. Kelly
2	Howard S. Gold	30	Barbara Dudman	58	Gerald and Robin Wisdom
3	Tim Rosenthal	31	Richard Campos	59	Donald Fontenot
4	Jacob S. Handwerher	32	C.E. Close M.D.	60	McKenzie Flyfishers
5	Ianto Evans	33	Bruce Campbell	61	Olive Miller
6	Allison Hamilton	34	Gerald Orchard	62	Joanne Vinton
7	Friends of Living Oregon Waters	35	Dr. & Mrs. Jonathan S. Levy	63	James Bender
8	Nan & Walter Simpson	36	Sally Streeter	64	Clifford E. Anderson
9	J. Cass	37	Frances Petschek	65	Gary and Christine Pellett
10	Gary Brostek	38	Paul Moss	66	Patricia K., Just Imagine U, Inc.
11	Sallie S. Danielson	39	R. Meehan	67	C Smith
12	Lynn Pruzan	40	Terry Raymer	68	Mark R. Furler
13	Lea Wood	41	Barbara Deutsch	69	Shirley Nelson
14	David and Julie Occhioto	42	Siskiyou Project	70	Charles Steadman
15	David Rains Wallace	43	Headwaters	71	Randall E. Hartman
16	Northwest Environmental Defense Center	44	Klamath Siskiyou	72	James Bender
17	Ted Scourles	45	Stacy Drake	73	Phyllis Kirk
18	Alex Hamilton III	46	Jonathan Levann	74	Myra Erwin
19	Judith K. Canepa	47	Association of O & C Counties	75	Deborah Newell
20	Jeremy Kamil	48	Lance Bisaccia	76	Dianna Huntington
21	William K. Steele	49	Siskiyou Chapter, Native Plant Society of Oregon	77	Peter Zadis
22	Barry D. Blumberg	50	Elaine Woodruff	78	M.L. Chris Fielding
23	Jim O'Niel	51	Chris Matheurn	79	Corrie Watterson
24	Oregon Natural Resource Council	52	Rachel Aquino	80	Robert Adams
25	Neil Seigel	53	Joan Baylie and Jim Mullins	81	Mr. & Mrs. Stephen L. Graves
26	David Mildrexler	54	John Schraufnagel	82	Reg Reagau
27	John Saemann	55	Phyllis Macy	83	Charlie Vincent
28	Karen L. Machciniski	56	Bradley H. Boyden	84	Connie Lonsdale

#	Name of Commentor	#	Name of Commentor	#	Name of Commentor
85	Rod Birney, M.D.	107	Diane Hillgrove	130	Elizabeth Roberts
86	John M. Kalb	108	United States Environmental Protection Agency Region 10	131	John Yoakum
87	Paul T. Howard	109	Jane Moody	132	Francis Eatherington
88	John Saemann	110	Karen Salley PhD	133	Don Schuman
89	Susan Landu	111	Steven Polinger	134	Sarah Damsell
90	Dorothy J. Layman	112	George Shook	135	Marion Warfield
91	John Pamperin	113	Carla Winston	136	Scott Vasak
92	Susanna DeFazio	114	Swanson Group, Inc.	137	Guy Prouty
93	Sharon Laskey	115	Barry Sniktkin	138	Alice Di Micele
94	David Shane	116	David Dillon	139	Christine Perala
95	Julie Remmerde	117	Justin Fleming	140	Adrienne Sturbois
96	Helon Howard	118	Dave Metz	141	Cheyne Cumming
97	Margie Mee	119	Judith Gonzalez Plascencia	142	Rebecca P. Wilmore
98	Eletheah Kesarah	120	Bill Yake	143	Odgen Kellogg
99	Steve Krisa	121	Steve Koller	144	Larry Laitner
100	Carol Ampel	122	Dave Willis		
100	Carol Ampel	123	S. Gertsch/R.Moore		
101	Alison Miller	124	Beverly B. McDonald		
102	Southern Oregon Timber Industries Association (SOTIA)	125	Wayne L. Kelly		
103	Robert R. Rodriguez	126	Cynthia M. Hogan		
104	Swanson Group	127	Rolf Starr		
105	Robert L. Harvey	128	Gerald G. Gold		
106	M. Levin	129	Russell Frankel		

①

Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

Dear Ms. Boody,

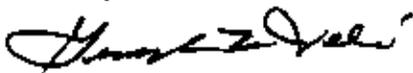
These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

- \* the Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!
- \* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!
- \* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres
- \* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,



Gerald F. Jeli  
6524 SW View Point Terrace  
Portland, Oregon 97201-3515

(2)

7-3-02

Dear BLM, and Lynda Roddy,

Please save the Ancient  
Old Growth Forests. There aren't  
many left. I love to see the  
old, tall, wide trees when I  
visit out West. I hope to make  
my home in the Pacific NW, and  
want our citizens in the future  
to be able to enjoy it, too.  
Specifically - the Lane Grey Roadless Area  
- no roads or logging  
- Save the full East Fork Whiskey Creek  
all 2844 acres  
- decommission more roads.

Thank you,  
Howard D. Dill  
4409 S. Fairfield  
Chicago, IL 60632

July 11, 2002  
P.O. Box 501  
Port Townsend, WA 98368

(3)

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, Oregon 97504  
Attn: Lynda Goody  
Dear Mr Goody:

Are you folks crazy? Living in the 19<sup>th</sup> Century? corrupt? or do you just hate America? In this day and age there is utterly no excuse for logging old growth, older trees. Are you totally ignorant of the massive threats to the environment on all fronts? and yet you wish to destroy, log, road a small remnant of precious, pristine environment. Are you mad? or just utterly irresponsible.

Leave Gave Frey Roadless Area alone.  
No roads. No logging. No critical habitat degradation.  
No clearcuts.

Think of your grandkids and get  
with it. Tim Rosenthal

Dear Medford BLM,

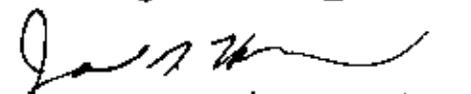
(4)

My name is Jacob S. Handwerker and I am a resident of Southern Oregon. I'm writing this letter because I am deeply troubled by the Kelsey-Whiskey timber sale. This sale is proposed in one of the few remaining wild places in our region. Today, we have so few areas ~~that~~ left that have not been disturbed and the Zane Grey roadless area deserves to remain that way.

Southern Oregon and our country is changing, and the future of our area ought not to depend on unsustainable forest practices, and instead focus on protecting and sharing the beauty of our region with others.

I am asking you to leave the Zane Grey roadless area alone i.e. no logging and no roads. Also, the BLM ought to immediately stop logging in spilted out habitat and halt regenerative cuts. Massive clearcuts and destroying ancient trees do not help "restore" the forest. Finally, the East Fork Whiskey Creek ACBC should include the full 2,844 acres and the 10.4 miles of road decommissioning proposed is a good start, but should be increased.

Thank you for your time and listening to my thoughts.

  
Jacob S. Handwerker  
2025 Tolman Crk Rd  
Ashland, OR 97520



(5)

10 July 2002.

KELSEY-WHISKEY TIMBER SALE

Dear Lynda Boddy,

The proposed timber sale and new road will affect ecological and scenic values, and therefore derivate tourist potential. My clients regularly vacation in the Siskiyoues, specifically the Lane Grey. They bring money and jobs to Oregon from all over the world.

I am opposed to roads or logging in the Lane Grey. The 10 miles of road closure proposed in the DEIS is welcomed. No more new roads please.

I understand that the older forests have a lower incidence of catastrophic fire than new plantations. Makes sense, I live in the forest.

Respectfully,

A handwritten signature in black ink, appearing to read "Ianto Evans".

IANTO EVANS. DIRECTOR / OWNER.

July 10, 2002

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
Attn: Lynda Boody

6

Dear Ms. Boody,

I am writing to ask that the Medford office of the BLM remove the Kelsey-Whisky timber sale (in the Zane Grey roadless complex) from its list of proposed cuts.

Why in the world is the BLM still insisting on logging old growth, when survey after survey of the American public shows that **WE WANT OLD GROWTH PRESERVED!** What does it take to get the attention of the policy makers at the BLM?

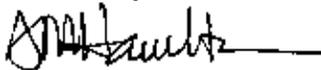
The proposed timber sale would clear-cut ancient forests and punch logging roads into the pristine Zane Grey roadless area adjacent to the Wild Rogue Wilderness.

The Zane Grey roadless complex is a remarkably wild and rugged forest amid an ocean of clear-cuts along the famous Wild & Scenic Rogue River. The 46,646 acre area is the largest intact forested roadless area managed by the BLM in the entire country. The ancient forests of Zane Grey currently provide irreplaceable habitat for rare species such as the Northern spotted owl, Fisher, Southern Oregon Coho salmon, bald eagle, Tailed frog, Del Norte salamander, and the Northwestern pond turtle.

This priceless area should and must be left alone. No logging, no roadbuilding.

How can we honestly expect people in South America to quit logging their globally-significant rainforests, when we can't even leave the last remaining vestiges of our old growth forests in place? Let's get real, and set a global example we can be proud of (for once).

Very sincerely,



Allison Hamilton  
18230 Frost Road  
Dallas OR 97338-9468

cc: Congressman Peter De Fazio,  
151 W. Seventh St., #400  
Eugene, Oregon 97401-2649



7-1

## ***Friends of Living Oregon Waters***

P.O. Box 521, Ashland, OR 97520 • 541-482-2049 • [flow@oregonwaters.org](mailto:flow@oregonwaters.org) • [www.oregonwaters.org](http://www.oregonwaters.org)

July 12, 2002

Sherwood Tubman, Team Leader  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504



**RE: Kelsey-Whisky Draft Landscape Management Plan DEIS comments**

Dear Medford Bureau of Land Management,

Friends of Living Oregon Waters (FLOW) is a non-profit, 501(c)3, public interest conservation organization whose mission is to advocate for the protection and restoration of Oregon's waters. FLOW uses legal oversight and public education to help protect Oregon's rivers, streams, lakes, wetlands, and groundwater from the impacts of pollution and development. FLOW monitors the ecological health and management of all Wild and Scenic Rivers in the state of Oregon including the Wild and Scenic Rogue River and its tributaries.

FLOW's comments advocate for protection of water quality, fisheries, wildlife, biodiversity, forest health, recreation, economic diversity, and public disclosure.

### **Hydrology**

#### *Riparian*

1. We support the closing of roads through decommissioning and closing with gates/barricades. We commend the Medford BLM on their proposal (Alternative 4 of Kelsey-Whisky DEIS) to decommission 13.8 miles of road and close an additional 18 miles of road with gates/barricades.
2. Roads and logging degrade aquatic ecosystems by increasing levels of fine sediment deposited in streams and by altering natural streamflow patterns. Increased fine sediment deposition in

streams and altered streamflows and channel morphology result in increased adult and juvenile salmonid mortality, a decrease in aquatic amphibian and invertebrate abundance or diversity, and decreased habitat complexity. The DEIS did not present information regarding the significant effects of road construction (temporary or permanent), regeneration, thinning, and riparian activities on aquatic health. Deferring analysis to a brief, non site-specific ACS Appendix (Appendix 11), is not acceptable according to the public disclosure requirements of NEPA. Furthermore, FLOW asserts that the Medford BLM is vastly underestimating the significance of the proposed regeneration, road activity, and thinning on various streams in the planning area.

3. The DEIS did not present scientific evidence regarding the impacts of logging and road construction (even with regeneration planned) on riparian areas. FLOW summarizes and lists a sampling of references below with applicable findings for BLM consideration.

Roads degraded stream habitat for aquatic species, including salmonids, by accelerating erosional processes and modifying natural drainage networks. Roads accelerate soil erosion rates due to surface erosion and mass soil movement such as slumps and earthflows, debris avalanches, debris flows, and debris torrents. High rates of stream sedimentation result from this increased erosion. Soil erosion rates (m<sup>3</sup>/hectare) were 30 to 300 times higher on forests with roads than undisturbed forest. Roads also altered streamflow rates and volumes, which along with increased sedimentation, resulted in altered stream channel geometry. Acting as new flowpaths for water, roads increased the channel network over watersheds, increasing the drainage density. Erosion resulted in sedimentation of streams and declines in spawning habitat when too high a proportion of fine sediment was deposited. Macroinvertebrates, the primary food source of juvenile fish, also declined when large amounts of sediment were present. (Furniss, M. J., T. D. Roclofs and C. S. Yee. 1991. Road construction and maintenance. In Influences of forest and rangeland management on salmonid fishes and their habitats. American Fisheries Society Special Publication 19: 297-323)

Logging activities degraded stream habitat by changing the amount, quality, and timing of flowing water, increasing erosion rates, and reducing stream habitat diversity. Logging altered streamflows by affecting snow accumulation rates in forests and snow melt rates. Because of vegetation removal, logging also changed evapotranspiration rates and soil water content, with resulting increases in annual runoff. Soil compaction changed infiltration rates and therefore runoff and erosion rates. Stream channel structures were also altered after logging, with a corresponding loss of the habitat diversity required by fish populations. By accelerating erosion rates, logging increased sedimentation rates of streams. In the steep and high-rainfall forests of Oregon, Washington, British Columbia, and Alaska, for example, mass movements of soil were the dominant erosional process. Many of these mass movements originated on open areas after logging, with increases in frequency ranging from two to 31 times. (Chamberlin, T. W., R. D. Harr and F. H. Everest. 1991. Timber harvesting, silviculture, and watershed processes. In Influences of forest and rangeland management on salmonid fishes and their habitats. American Fisheries Society Special Publication 19: 181-205)

Soil erosion rates due to debris slides were many times higher on forests with roads, landings, and logging activity than on undisturbed forests. Mass erosion events were inventoried over a 20-year period in the Siskiyou National Forest in the Klamath Mountains of southwestern Oregon. Aerial photos were analyzed from 24 forest sites and erosion attributed to roads, logging, or natural events. The volume of soil mass movements was estimated from the

7-3

photographs, with partial field checking to confirm accuracy. Debris slides were found to be the primary type of mass erosion, accounting for about 80% of the volume of soil moved and 90% of mass erosion events inventoried. A total of almost 1.5 million yd<sup>3</sup> of debris slide erosion occurred. Roads, occupying 2% of the area studied, were the sites for more than half the slides and 60% of the erosion volume. Clearcut areas, occupying 10% of the area studied, were the sites for 34% of the slide events and 18% of the slide volume.

(Amaranthus, M. P., R. M. Rice, N. R. Barr and R. R. Ziemer. 1985. Logging and forest roads related to increased debris slides in southwestern Oregon. *Journal of Forestry* 83: 229-233)

Roads were responsible for 61% of the soil volume displaced by erosion in northwestern California. This study inventory covered 344 miles of roads in the Coast and Klamath Mountains. Roads were thinly rocked, graveled, or heavily rocked and regularly maintained logging roads. Slope, grade, aspect, cut-and-fill height, and soil volume displaced by erosion were recorded on each 1-mile road segment. Mass erosion was the predominant form of erosion occurring in the study sites. Roads caused 152 of the 171 major erosional events inventoried (events that displaced more than 20 cubic yards of soil), and 61% of the soil volume displaced by erosion was due to these road-related events. The remainder was due to natural events and some logging-caused erosion. Road-related erosion increased with the slope traversed by the road. Seasonal roads had similar erosion rates to main-haul (and regularly maintained) roads. In a separate study, erosion due to roads relative to logging areas was studied in 30,000 acres of commercial timberland in Six Rivers National Forest. The road network occupied less than 4% of the total logging area. Total erosion from the 30,000 acres was 137,800 cubic yards. Of this total, 40% came from the roads and 60% from the logged areas. The average erosion rate in the road rights-of-way (47 cubic yards per acre) was 17 times the average erosion rate in the logging areas (2.82 cubic yards per acre).

(McCashion, J. D. and R. M. Rice. 1983. Erosion on logging roads in northwestern California: How much is avoidable? *Journal of Forestry* 81: 23-26)

Clearcutting increased the frequency of mass soil movements from hillsides. A review of the scientific literature, including research from Alaska, Utah, California, Oregon, and Japan, demonstrated that clearcutting on slopes increased the frequency of mass soil movement events (landslides, earthflows, slips, etc.). The loss of forest cover was believed to affect slope stability in two principal ways:

a) Mechanical root support due to interconnected root systems was lost after logging. Research in Alaska, for example, indicated a time lag after clearcutting before landslide activity increased and a lack of landslide correlation with rainfall intensity. The authors believe this is due to the increased deterioration of root systems with time. Other studies similarly showed that with increasing age and maturity, the effectiveness of forest cover in preventing landslides increased.

b) A denuded slope was likely to reach critical soil saturation earlier than a forested slope (since no transpiration from trees can occur). Therefore, during a large storm, it was predicted that these soils would reach a critical failure condition earlier than a forested slope would.

(Gray, D. H. 1970. Effects of forest clear-cutting on the stability of natural slopes. *Bulletin of the Association of Engineering Geologists* 7: 45-66)

During storm events in southwestern Washington, average sediment levels in runoff from forest roads ranged from 500 mg/l to 20,000 mg/l. Roads were direct sources of sediment delivery to streams, with approximately 34% of road drainage points entering stream channels. The

7-4

authors studied the erosion of sediment from two kinds of forest gravel roads in southwestern Washington: heavily used, valley-bottom haul roads and midslope secondary haul roads. Sampling sites were located at the downslope of each cross-drain and at ditches draining from cut slopes. Traffic use of each road was also monitored. The sediment produced from each road segment was related to traffic rate as well as to type of road surfacing material. The majority of the sediment produced (80%) was material finer than 0.004 mm. Steeper roads produced a higher proportion of coarser material (primarily sand). Average sediment concentrations from the secondary road sites were 2,000 mg/l, with a maximum of 19,500 mg/l. Hourly concentrations from the mainline road ranged from 500-700 mg/l, occasionally exceeding 20,000 mg/l. Delivery of this sediment to streams was investigated by carrying out an inventory of road drainage sites in three watersheds. Two thousand drainage points, along 730 km of road, were identified. Of these, 34% directly entered streams rather than draining into the forest floor.

(Bilby, R. E., K. Sullivan and S. H. Duncan. 1989. The generation and fate of road-surface sediment in forested watersheds in southwestern Washington. *Forest Science* 35: 453-468)

Gravel forest roads generated up to 440 tons of sediment/km/year from surface erosion. A one-year field study was conducted to determine how much sediment was generated from forest road surfaces and from ditches and cutbanks. Ten road segments were investigated in the Olympic Mountains of Washington State. Of these, eight were gravel roads and two were paved roads. Traffic use was categorized as heavy (more than four logging trucks per day), moderate (one to four trucks), light, and abandoned. During rainstorms, water discharge was measured at the mouth of each culvert and from natural lips on abandoned roads. Rainfall intensities were recorded at each sampling location. Three factors - traffic intensity, road gradient, and road segment length - were investigated. Sediment loss was related to traffic intensity and was highest on heavy-use gravel roads compared to unused roads or paved roads. Sediment yield from cutbanks and ditches alongside paved roads was less than 1% of that from gravel roads. Heavily used roads were calculated to produce 440 tons of sediment/km/yr over the period of study, compared to lightly used roads with 3.8 tons/km/yr and paved roads with 2 tons/km/yr.

(Reid, L. M. and T. Dunne. 1984. Sediment production from forest road surfaces. *Water Resources Research* 20: 1753-1761)

Roads and clearcut logging increased peak stream discharges and advanced the timing of peak discharges in multiple paired watershed studies, most likely because of subsurface flow being converted to surface flow at road cuts. Even after many years, roads and clearcut logging, both together and separately, resulted in significant increases in stream peak discharges. The study examines paired watersheds in the western Cascades and examined road building, logging, and peak discharge records to compare streamflow peaks pre- and post-treatment. Records for two pairs of small basins extended over 34 years, and records for three adjacent large basin pairs extended over 50 to 55 years. One of the small watersheds was 100% clearcut without road construction. After clearcutting, a significant number of storms resulted in higher peak discharges and volumes, and began earlier. A higher-than-expected number of runoff events had greater peaks and volumes. Sixteen to 22 years after clear-cutting, average peak discharges were still significantly higher (almost 40%) than pre-logging levels. The second small basin provided four years of data on the impact of roads alone, before logging began. Roads occupied 6% of the watershed. After road construction, a higher-than-expected number of storm events had higher peak discharges and began earlier. After clearcutting 25% of the watershed, average

7-5

peak discharge increased by 50% in the first five years, and storm discharges began an average of six hours earlier than pre-treatment. After 25 years, average peak discharges were still significantly (more than 25%) higher than pre-management levels. Similarly, in the three large basin pairs, peak discharge increased as cumulative area logged increased. Begin times were not reported. The authors note that the most likely mechanism for the increase in peak flow due to just roads was road cuts converting subsurface flow to surface flow, which was then routed directly to stream channels. Logging, they conclude, had an impact on streamflow due to changes in evapotranspiration and snow accumulation and melt rates.

(Jones, J. A. and G. E. Grant. 1996. Peak flow responses to clear-cutting and roads in small and large basins, western Cascades, Oregon. *Water Resources Research* 32: 959-974)

Roads formed new surface flow paths to natural channels and incised new gullies, so increasing the routing efficiency of water; thereby probably explaining some higher stream peak flows. Two fifth-order basins (Lookout Creek and Blue River), in the western Cascades of Oregon, were studied to determine the mechanism by which logging roads may alter stream peak flows by changing water routing efficiency. The road density in each basin was 1.9 km/km<sup>2</sup>, and roads occupied 3% of each basin's area. A sample of 62 km of the road network was surveyed. A total of thirty-one 2-km transects was selected, and the transects were subdivided into segments at each culvert. Study sites were distributed between valley, midslope, and ridgetop sites and among roads ranging in construction period from the 1950s to the 1990s. A subsample was also studied immediately after storm events. Road culverts delivered water to natural stream channels at stream crossings, into new gullies incised below culvert outlets, or onto hillslopes, where water reinfilted the soil. The first two mechanisms of surface flow linked the roads directly to the stream channel network. More than 57% of the total road length surveyed was calculated to be connected to the stream network by these two flowpaths. Of the 436 culverts examined, 33% crossed streams and 23% were ditch-relief culverts with gullies incised below. Thirty-four percent of the road length drained to stream channels and 24% drained to gullies. Of the gully-forming culverts studied immediately after storm events, approximately half directed surface runoff to a nearby channel or saturated area. The authors estimated that these new flowpaths due to roads resulted in an increased drainage density of 36% and 39% in the two basins, although they noted that these figures would probably vary by season and by the degree to which gullies were connected to streams.

(Wemple, B. C., J. A. Jones and G. E. Grant. 1996. Channel network extension by logging roads in two basins, western Cascades, Oregon. *Water Resources Bulletin* 32: 1195-1207)

Forest roads extended the natural channel network, initiated new channels, and increased the susceptibility of steep slopes to landsliding. Road cuts intercepted subsurface flow and diverted it to roadside ditches. Field surveys were conducted at three sites in the western United States to investigate road drainage and associated landsliding and channel network extension. The study sites were located in 1) the southern Sierra Nevada; 2) on Mettman Ridge in the Oregon Coast Range; and 3) on Huelsdonk Ridge on the Olympic Peninsula. Drainage area and slope were determined to be the key criteria contributing to slope instability (so leading to landslides) and initiation of new water channels. The author mapped all discharge points from the roads and estimated the contributing drainage area. In each area, average ground slopes were also measured. In the southern Sierra Nevada site, road drainage resulted in the road surface acting as an extension of the natural channel network. Road cuts had diverted both surface and subsurface flow into ditches. Four hollows had lost natural drainage waters due to diversion by the roads. Three different hollows received extra drainage from the road system. The overall drainage density of the area studied (1.2 km<sup>2</sup>) had increased by a factor of 1.6. Forest roads

studied in Oregon and Washington were both ridgetop roads. Roads had initiated new channels. Road-associated landsliding was highest on the steepest slopes and on slopes having the greatest drainage area. Drainage density due to new water flowpaths increased by a factor of 1.23 at the Oregon study site; no figure was reported for the Washington site. Road discharge points were studied immediately after rainfall only at Oregon site. At other sites, the author estimate that mapping accuracy of drainage areas was within +/- 30%.

(Montgomery, D. R. 1994. Road surface drainage, channel initiation, and slope instability. Water Resources Research 30: 1925-1932)

Salmonid survival rates decreased after logging and road construction as fine sediment levels in streams increased and as important habitat characteristics, including the number of pools and winter cover, decreased. Studies from Oregon, Idaho, British Columbia, and Alaska, for instance, showed that salmonid abundance and fry survival decreased as fine sediment levels increased after logging. Fine sediment in deposits or suspension also reduced the availability of food in streams by reducing invertebrate abundance and primary production. Suspended sediment increases were shown to affect salmonids in various ways, including avoidance, cessation of feeding, and disrupted social behavior. The increased frequency of landslides and other mass erosion events due to logging and roads changed channel morphology, reducing pool area and depths and resulting in stream reaches that were wider, shallower, and more prone to bank erosion. Studies in British Columbia, for instance, showed that pool habitat was reduced by an average of 79% in streams affected by debris torrents and suitable winter cover was reduced by an average of 75%. Coho salmon winter survival averaged 1.8% in stream reaches affected by debris torrents compared to survival rates of 24.5% in unaffected streams. (Hicks, B. J., J. D. Hall, P. A. Bisson and J. R. Sedell. 1991. Responses of salmonids to habitat changes. In Influences of forest and rangeland management on salmonid fishes and their habitats. American Fisheries Society Special Publication 19: 483-518)

Survival rates of Coho salmon and steelhead trout fry decreased as the proportion of fine sediment in spawning gravel increased. Laboratory experiments were conducted at the Alsea Watershed Study field station to investigate the relationship between the proportion of fine sediment in spawning gravel and the survival of coho salmon (*Oncorhynchus kisutch*) and steelhead trout (*Salmo gairdneri*) fry. Six different gravel sizes were mixed in troughs to create spawning gravel similar in composition to natural coho salmon redds in Deer Creek, in the Oregon Coast Range. The proportion of fine sediment (sand 1-3 mm in diameter) was then increased by 10% increments to create eight gravel mixtures with 0-70% sand by volume. Coho salmon and steelhead fry were buried in the gravel, and their date of emergence, survival, and weight were recorded. Six replicates were tested. As the proportion of fine sediment in the gravel mixtures increased, coho salmon fry emerged earlier and were smaller in size. Their survival rates decreased as fine sediment percentage increased, from 96% survival in the control gravel mixture to 8% survival in the mixtures containing 70% sand. Fine sediment proportions had no effect on the timing of steelhead fry emergence. However, their survival patterns were similar to those of coho salmon fry, with 99% survival for steelhead fry in the control mixture and 18% in the 70% sand mixture. The authors note that sediment sizes smaller than 1 mm were not tested in their experiment and that total emergent fry survival could be even lower under conditions that included finer sediment. They also note that if fish were exposed to high sediment levels for a longer time period, from egg fertilization through development, mortality due to indirect effects such as low oxygen concentrations could be higher.

(Phillips, R. W., R. L. Lantz, E. W. Claire and J. R. Moring. 1975. Some effects of gravel mixtures on emergence of coho salmon and steelhead trout fry. Transactions of the American Fisheries Society 3: 461-466)

Brook trout populations declined significantly after stream sedimentation levels increased. Populations of stream benthic invertebrates (the major food source of brook trout) declined significantly after stream sediment levels increased. Higher fine sediment levels in a stream resulted in a loss of pool habitat, fish cover, changes in stream velocity, and higher summer water temperatures. The effects of sedimentation on populations of brook trout (*Salvelinus fontinalis*) and stream channel physical characteristics were investigated over a period of 15 years in Hunt Creek in the Lower Peninsula of Michigan. Trout populations were monitored for five years prior to sand deposition, for five years during which sand was introduced into the stream, and then five more years without adding sand. The study area was divided into two 1-mile sections, with the upper section of the stream serving as a control throughout the study. For five years, sand was introduced daily into the treated section of the stream, increasing total sediment concentrations from approximately 20 ppm to 80 ppm to replicate concentrations reported for trout streams with severe streambank erosion. Cross sections were established at 100-ft intervals to document changes in stream channel characteristics. Brook trout were collected from spring through fall every year, as were samples of benthic invertebrates (their primary food source). The volume of sand deposited on the streambed gradually increased over the study period. A significant decrease occurred in brook trout populations in the treated section of the stream, a decrease particularly evident four years after the initial introduction of sand. Total trout numbers dropped by 51%, a statistically significant change. Trout of all sizes and ages declined in number in the sand-treated section compared to the control section of the stream. There was no change in growth rates. After sand introduction, populations of benthic invertebrates also dropped to less than half their pre-treatment populations. The insect orders of Ephemeroptera, Diptera, Coleoptera, Trichoptera, and Plecoptera showed the most significant declines. Fish stomach analyses revealed that the majority of these taxa were important food sources for brook trout. Stream physical characteristics also changed with increased levels of sedimentation. The stream became wider and shallower, pools disappeared, and the stream bottom lost all fish cover after becoming uniformly covered by sand. Water temperatures in the summer increased. Deeper stream depths near the banks disappeared.

(Alexander, G. R. and E. A. Hansen. 1986. Sand bed load in a brook trout stream. North American Journal of Fisheries Management 6: 9-23)

Delivery of fine sediments to streams and deposition on spawning and rearing substrate decreased after a moratorium on logging, but increased again after logging resumed. The effects of fine sediment delivery to rivers from logging and road construction were studied in habitat for chinook salmon (*Oncorhynchus tshawytscha*) and steelhead (*O. mykiss*, formerly *Salmo gairdneri*). Spawning and rearing areas were studied after a logging moratorium was declared in the watershed of the South Fork Salmon River, which drains part of the Idaho Batholith. Ten transects were established at each of five chinook salmon spawning areas, and substrate characteristics were measured for 20 years. After logging ceased, there was a significant decline in the percentage of fine sediment (material <4.75 mm in diameter) on the surface of 84% of the spawning area locations. Overall sediment declines over the 20 years varied at each of the five spawning areas, but ranged from a decrease by 16.7% at one area to a decrease by 76.5% at another. The percentage of gravel and rubble correspondingly increased. Within two years of resuming logging, however, surface fine sediments increased at all five spawning areas, with overall increases of 22.2% to 83.8%. In salmon rearing areas, transects

were established at 15-m intervals at 47 sample stations. Data were collected from these areas for six years. The percentage of fines on the surface of rearing areas decreased by 73.5% over the study period. Overall, rearing areas had lower levels of fine sediment deposition from logging than spawning areas did.

(Platts, W. S., R. J. Torquemada, M. L. McHenry and C. K. Graham. 1989. Changes in salmon spawning and rearing habitat from increased delivery of fine sediment to the South Fork Salmon River, Idaho. *Transactions of the American Fisheries Society* 118: 274-283)

Adult and juvenile salmonids exposed to suspended fine sediment in streams had an increasingly negative response as concentrations and duration of exposure increased. The study reviewed 80 published studies on the response of fish to suspended sediment in streams. Data from these studies were used to develop models quantifying the response of fish to varying sediment concentrations and varying durations of exposure. This response was defined as "severity of ill effect," which included effects such as reduced growth rates, reduced fish density, reduced fish population size, and habitat damage. The data were also used to provide estimates of the onset of sublethal and lethal effects in fish. Data were grouped into six subcategories based on species, age, and sediment size. Adult and juvenile salmonids exposed to particle sizes of 0.5-250  $\mu$ m showed an increasingly negative response as sediment dose increased, and sublethal and lethal effects occurred at high doses. The equations derived for the model were tested against newer data and validated.

(Newcombe, C. P. and J. O. T. Jensen. 1996. Channel suspended sediment and fisheries: a synthesis for quantitative assessment of risk and impact. *North American Journal of Fisheries Management* 16: 693-727)

The density of all three stream amphibian species studied was lower in streams affected by sediment due to road construction than in control streams. Two of three species had significantly lower numbers in all five stream microhabitats. The study analyzed the impact of highway construction and resulting erosion on the abundance of stream amphibians in California old-growth redwood forest. A major storm during road construction resulted in large volumes of sediment from mass wasting and surface erosion entering stream channels. Five streams affected by sediment were compared with five control streams in the same basin. The three most abundant native amphibians were sampled - larval Pacific giant salamanders (*Dicamptodon tenebrosus*), larval tailed frogs (*Ascaphus truei*), and larval and adult southern torrent salamanders (*Rhyacotriton variegatus*). Salamander densities were surveyed in transects placed throughout more than 3 km each of affected stream habitat and control stream habitat. Different habitat types were sampled, including pools, glides/runs, riffles, step runs, and step pools. A total of 267 transects, 0.6 m wide, was sampled, with 540 individual amphibians captured. The density of Pacific giant salamanders and southern torrent salamanders was significantly lower in the sedimented than in the control streams. The density of tailed frogs was lower in their preferred riffle and step run habitat in sedimented streams as opposed to control streams, although results were not statistically significant.

(Welsh, H. and L. M. Ollivier. 1998. Stream amphibians as indicators of ecosystem stress: a case study from California's redwoods. *Ecological Applications* 8: 1118-1132)

Roads were associated with a diversity of negative effects on the biotic integrity of both terrestrial and aquatic ecosystems. A review of the scientific literature reveals seven general effects of roads of all kinds on the ecosystem. 1) Road construction resulted in the death or injury of roadside plants or slow-moving animals, compacted soils, and affected water bodies at road crossings. 2) Roadkill affected the demography of numerous species. 3) Animal behavior

7-9

changed due to roads, with avoidance of roads, modification of movement patterns or home ranges, changes in reproductive success, escape behavior, or physiological state. 4) Roads disrupted the physical environment by changing soil characteristics such as density, surface runoff, and sedimentation. They altered the hydrology of slopes and stream channels, created barriers to the movement of fish and other aquatic animals, and altered channel and shoreline development. 5) Roads affected the chemical environment by contributing pollutants such as heavy metals, salts, or nutrients to roadside plant and animal communities as well as to aquatic ecosystems through runoff. 6) Roads promoted the spread of exotic species. 7) Roads increased access by humans, and therefore increased poaching pressure, fishing, and passive harassment of animals.

(Trombulak, S. C. and C. A. Frissell. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology*)

Roads are a major cause of forest fragmentation because they divide large landscape patches into smaller patches and convert forest interior habitat into edge habitat. Clearcuts and roads affected 2.5 to 3.5 times more of the landscape than the surface area occupied by the actual clearcuts and roads themselves. Fragmentation due to roads was quantified in a 30,123-ha area of the Medicine Bow-Routt National Forest in southeastern Wyoming. A geographic information system was used to analyze landscape structure. Forest patch and edge-related landscape changes were measured using several indices: the number of patches, mean patch area, mean interior area, mean area of edge influence, mean patch perimeter, total perimeter, and mean patch shape. Roads contributed to forest fragmentation more than clearcuts in the study area since they dissected large forest patches into smaller fragments. They also converted more forest interior habitat into edge habitat. The edge habitat due to roads was 1.54 to 1.98 times the edge habitat created by clearcuts. Taking these factors into account, the authors calculated that together, clearcuts and roads affected 2.5 to 3.5 times more of the landscape than the area occupied by the actual clearcuts and roads themselves.

(Reed, R. A., J. Johnson-Barnard and W. L. Baker. 1996. Contribution of roads to forest fragmentation in the Rocky Mountains. *Conservation Biology* 10: 1098-1106)

Road networks affected stream systems, increasing the frequency and/or magnitude of peak flows, debris flows, and landslides. The study looked at two key processes influencing riparian vegetation and channel morphology: peak flows (floods) and debris flows. Fifty years of research on biophysical processes on watersheds in the H. J. Andrews Experimental Forest in Oregon provided evidence for the impacts of roads. The road network was found to be hydrologically connected to the stream network and increased the frequency and/or magnitude of peak flows, particularly in small basins. Roads and logging together generally had a more severe effect. Debris slides, resulting in debris flows, were also frequently associated with roads. These debris flows affected the disturbance patterns of streams and transported sediment to segments of the stream. Both peak flows and debris flows influenced stream physical features such as channels, bars, and flood plains, which in turn are closely associated with riparian vegetation and aquatic communities. The authors review studies on native aquatic organisms, such as salmonids, for instance, that had evolved with historical disturbance patterns of their stream habitat.

(Jones, J. A., F. J. Swanson, B. C. Wemple and K. U. Snyder. A perspective on road effects on hydrology, geomorphology, and disturbance patches in stream networks. *Conservation Biology*)

4. In the FEIS the Medford BLM should analyze the Riparian Reserves for all streams, including intermittent streams, in terms of their ability to support the habitat needs of fish, wildlife and plant species that use the reserves as refugia. According to the Northwest Forest Plan “any analysis of Riparian Reserve widths must also consider the contribution of these reserves to other, including terrestrial, species.” (ROD, p. B-13)

Analysis in the FEIS should consider the contribution of riparian reserves to thermal ground cover; habitat connectivity; refugia for species with limited dispersal capabilities; and dispersal opportunities for species with large home ranges. A complete analysis that considers the contribution of Riparian Reserves to terrestrial habitat can produce reserves that actually exceed the widths required to protect riparian and aquatic ecosystems. According to the Northwest Forest Plan “other Riparian Reserve objectives, such as providing wildlife dispersal corridors, could lead to Riparian Reserve widths different than those necessary to protect the ecological integrity of the intermittent streams or wetlands. These other objectives could yield wider Riparian Reserves than those necessary to meet Aquatic Conservation Strategy Objectives.” (ROD, p. B-14)

5. The cumulative impacts on hydrology should be fully explored in the FEIS. The analysis in the DEIS did not inform the public of the actual impacts of past, present, and reasonably foreseeable activities within or affecting the hydrology of the project area.
6. The DEIS proposes numerous “treatments” within riparian reserves. The Northwest Forest Plan states, “regardless of stream type, changes to Riparian Reserves must be based on scientifically sound reasoning, and be fully justified and documented.” (ROD at B-16)
7. The DEIS has components that clearly propose logging near numerous intermittent streams. The Northwest Forest Plan makes it clear that protecting intermittent streams and wetlands is critical: “Including intermittent streams and wetlands within Riparian Reserves is important for successful implementation of the Aquatic Conservation Strategy. Accurate identification of these features is critical to the correct implementation of the strategy...” (ROD, p.B-14)
8. The Northwest Forest Plan explicitly states minimal standards and guidelines for protecting intermittent streams. At a minimum the Riparian Reserves must include 1) the extent of unstable and potentially unstable areas (including earthflows), 2) the stream channel and extend to the top of the inner gorge, 3) the stream channel or wetland and the area from the edges of the stream channel or wetland to the outer edges of the riparian vegetation, and 4) extension from the edges of the stream channel to a distance equal to the height of one site-potential tree, or 100 feet slope distance, whichever is greatest. (ROD, p.C-31)

#### *Surface Water/Clean Water Act*

1. It is the goal of the Clean Water Act to restore and maintain the chemical, physical, and biological integrity of the nation’s waters. The final management plan should clearly demonstrate that project implementation would comply with state water quality standards. State water quality standards establish designated uses for a water body (or water body segment), support the uses with water quality criteria, and protect that water quality with an Antidegradation Policy. FLOW recommends full disclosure of all project related water quality impacts, along with a clear explanation of how water quality standards will be maintained. The

management plan should provide a quantitative basis to judge whether the physical and chemical parameters, such as temperature, turbidity, and sediment accumulation, will be kept at levels that will protect and fully support designated uses and meet water quality standards under each of the action alternatives.

2. The final management plan should provide a detailed description of the existing physical, chemical, and biological characteristics of streams other water bodies in the planning area. Identification of potentially affected watersheds on maps clarifies the relationships between local waters and proposed project activities. The DEIS does not adequately describe these characteristics of streams in the planning area and the public needs this important information to determine if project effects significantly alter the baseline condition of these waters.
3. The management plan should describe the relationship between surface water quality and biota found in affected waters. The management plan should clearly describe the effect of each alternative on designated uses for area surface waters with particular attention to fisheries spawning and rearing habitat. It should also identify which water quality parameters, if any, are limiting factors to local fisheries under each alternative. This information should show the extent to which fish habitat could be impaired by project activities, including effects on stream structure, seasonal and spawning habitats, large organic material supplies, and riparian habitats. The analysis should disclose whether the management plan would cause any reductions in habitat capability or impair designated uses, including cold water fish habitat.
4. An antidegradation analysis, as specified in the Antidegradation Policy (40 C.F.R. 131.12) should be included in the management plan. This policy was developed to assure that designated surface water uses would not be degraded. A state's Antidegradation Policy provides protection for surface waters that currently meet water quality standards (Tier 1 waters), currently exceed them (Tier 2 waters), and are considered of outstanding value (Tier 3 waters).
5. If projects tiered off of the management plan call for disturbances within a riparian area, an assessment of the impacts on riparian functions and values should be provided in the management plan. Measures for avoidance and mitigation for riparian areas should be thoroughly discussed.

### **Wild and Scenic Rivers Act**

1. The EIS should include an analysis of the K-W Project on Wild and Scenic River values of the Rogue River. According to Section 10(a) of the Wild and Scenic Rivers Act "Each component of the National Wild and Scenic Rivers System shall be administered in such a manner as to protect and enhance the values which caused it to be included in said system without; insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values. In such administration, primary emphasis shall be given to protecting its esthetic, scenic, historic, archaeologic, and scientific features. Management plans for any such component may establish varying degrees of intensity for its protection and development, based on special attributes of the area." There should be an analysis included in the EIS that determines what effect the proposed K-W Project will have on the outstandingly remarkable values of the Wild and Scenic Rogue River.

2. On p. 4-29 of the DEIS it says that there would be "no effect on the Wild and Scenic Rogue River, since all proposed treatments would conform to the VRM standards and other restrictions called for in managing Wild and Scenic Rivers." In the interest of public disclosure there should be a full analysis of whether the K-W Project will impacts these values instead of just stating an assumption without technical, legal, or resource citations.
3. There are numerous "treatments" that are being recommended for the K-W Project that may affect the Natural Scenic Qualities (one of the three ORVs for the W&S Rogue River). They include activities within the Wild and Scenic corridor (fuels treatments) and activities that are near the corridor (pine conversion, fuels treatments, commercial density management, regeneration, and road construction). These activities should be reviewed, in the EIS for public disclosure, as to whether or not they affect Natural Scenic Qualities of the W&S Rogue River.
4. Depending on the EIS prescriptions and selected alternative there may also be an effect on the Fisheries ORV of the W&S Rogue River. Effects to fisheries should be analyzed as to whether or not they "protect and enhance" the fisheries of the W&S Rogue River.
5. Recreational opportunities are the final ORV for the W&S Rogue River. There should be an analysis of whether or not the proposed activities of the K-W Project will affect recreation within the area. Proposed activities could diminish recreational activities within the area and should be analyzed in the EIS.
6. Under the implementing regulations of the act it is stated that: "In cutting and removing timber and timber products and in locating and constructing and using mills, logging roads, railroads, chutes, landings, camps or other improvements no unnecessary damage shall be done to air, water, soil products ... " 36 CFR §251, 251.14(a)(2).
7. The Act provides that federal agencies "having jurisdiction over any lands which include, border upon, or are adjacent to" a designated river "shall take action respecting management policies, regulations, contracts, plans, affecting such lands ... as may be necessary to protect such rivers in accordance with the purposes of this chapter." It is also stated that: "Particular attention shall be given to scheduled timber harvesting ... and similar activities which might be contrary to the purpose of this chapter. 16 USCS §1283(a).

In one court case, Judge Karlton of the Eastern District of California granted a preliminary injunction enjoining implementation of the South Fork Fire Recovery Salvage project on the Shasta-Trinity National Forest in California. The injunction was issued because the judge found a significant likelihood that the salvage project would adversely affect the river environment. The Wilderness Society v. Tyrrel, 701 F Supp (1989).

Judge Karlton "found as a matter of law that the WSRA's protection of the river is not limited to a 1/4 mile corridor ... The court has determined that defendants were wrong as a matter of law in believing that preservation of the 1/4 mile corridor fulfilled their duties." He cited the prior order:

... the Act provides that "(p)articular attention shall be given to scheduled timber harvesting, road construction, and similar activities which might be contrary to the purpose of this chapter." 16 USC 1283(a). In sum, while timber cutting and road

construction within Wild and Scenic River corridors are not considered by definition to substantially interfere with the Act's objectives, Congress has specifically singled out these activities as the very sorts of concerns for which the Act's compulsory management plans are of critical significance.

8. Oregon law requires that: "In no event ... may degradation of water quality interfere with or become injurious to the beneficial uses of water within surface waters of the following areas: ... (B) National Wild and Scenic Rivers." OAR 340-41-026(1)(a).

### Roadless Areas

The Medford BLM should consider the impacts of the K-W Project on the Zane Grey Roadless Area. This is an issue that has been frequently raised by numerous individuals and organizations over the planning process. It is in the public interest to review impacts of the K-W Project on the Zane Grey. The Zane Grey includes 24 miles of the Wild and Scenic Rogue River and is contiguous with the designated Wild Rogue Wilderness Area just downriver.

### Visual Effects

The FEIS should analyze, in greater detail, the effects that the K-W Project will have on the visual and aesthetic qualities of the area. Users of public lands are increasingly concerned about the quality of their visual environment. A number of people use the roads in or near the planning area for aesthetic, occupational and recreational purposes. Many people use the trails and campgrounds within the project area. Many people object to the visual quality of regeneration harvests and their presence may negatively impact their outdoor experience. The DEIS gave a short, cursory analysis to Visual consequences yet this issue is very important to the large number of people who recreate within the project area, including those who raft or hike along the Wild and Scenic Rogue River.

### Fire

1. Fire prevention is being used as a primary need for "treatment" of various forested stands throughout the K-W Project. Consideration of the following points and sources should help determine if treatments are consistent with the best science concerning fire and forest health. There are numerous scientific sources regarding appropriateness of logging to prevent forest fires and these should be analyzed and presented in the FEIS for informed decisionmaking and review.
2. A primary indicator of a direct relationship between fires and roads is the high frequency of human-caused fires in comparison to fires started by lightning. According to data from the Interagency Fire Center collected between 1988 and 1998, 88.1% of all wildland fires were caused by humans, in contrast to 11.9% started by lightning (Department of Interior, 1999). The destructive potential of roads, combined with the difficulty of regulating human use and

behavior on or near roads, renders prevention of unnecessary roads and the obliteration of roads in highly sensitive areas the most significant means to limiting fire risk associated with roads

3. Most fire risks are in the interface, roaded, and logged forests – particularly plantations. Restoration should therefore target areas in greatest need first – interface, followed by already logged and roaded areas and plantation forests. The BLM should apply prescribed fire based on site-specific analysis of current and historic forest conditions, landscape context, watershed integrity, status of at risk species, and other ecological values. Treat in areas where dominant forest types are characterized by relatively frequent, low-and mixed-severity fire regimes (forests most likely altered by suppression). Reintroducing fire is operationally feasible with minimal risk of adverse impacts on soils, watershed, wildlife, and other ecological values - this will help achieve high integrity and resilience to fire. Prescribed fire can be strategically located to break up the continuity of fuels at the landscape level (e.g., south- and west-facing upper slopes). (A Big Picture Approach to Forest Restoration: Putting the Pieces Back Together Again. Dr. Dominick Dellasalla. Application of Forest Restoration- Roaded/Interface vs. Roadless Landscapes. p.6)
4. Commercial logging reduces the "overstory" tree canopy which moderates the "microclimate" of the forest floor. This reduction of the tree canopy exposes the forest floor to increased sun and wind, causing increased surface temperatures and decreased relative humidity. This in turn causes surface fuels to be hotter and drier, resulting in faster rates of fire spread, greater flame lengths and fireline intensities, and more erratic shifts in the speed and direction of fires. "Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other recent human activity." (Sierra Nevada Ecosystem Project, 1996. Final Report to Congress)
5. "Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes. In general, rate of spread and flame length were positively correlated with the proportion of area logged in the sample watersheds." (Historical and Current Forest Landscapes in Eastern Oregon and Washington. Part II: Linking Vegetation Characteristics to Potential Fire Behavior and Related Smoke Production (PNW-GTR-355))
6. "As a by-product of clearcutting, thinning, and other tree-removal activities, activity fuels create both short- and long-term fire hazards to ecosystems. The potential rate of spread and intensity of fires associated with recently cut logging residues is high, especially the first year or two as the material decays. High fire-behavior hazards associated with the residues can extend, however, for many years depending on the tree. Even though these hazards diminish, their influence on fire behavior can linger for up to 30 years in the dry forest ecosystems of eastern Washington and Oregon." (Historical and Current Forest Landscapes in Eastern Oregon and Washington. Part II: Linking Vegetation Characteristics to Potential Fire Behavior and Related Smoke Production (PNW-GTR-355))
7. "Mechanically removing fuels (through commercial timber harvesting and other means) can also have adverse effects on wildlife habitat and water quality in many areas. Officials told GAO that, because of these effects, a large-scale expansion of commercial timber harvesting alone for removing materials would not be feasible. However, because the Forest Service relies on the timber program for funding many of its activities, including reducing fuels, it has often used this program to address the wildfire problem. The difficulty with such an approach.

however, is that the lands with commercially valuable timber are often not those with the greatest wildfire hazards." (Government Accounting Office: "Western National Forests: A Cohesive Strategy is Needed to Address Catastrophic Wildfire Threats" (GAO/RCED-99-65))

8. The high value of water, the widespread degradation of watersheds, and the prevalence of at-risk populations of fish require that these values receive special consideration in forest management decisions, including forest restoration. Strategies for conserving both aquatic and terrestrial resources at multiple scales are based on similar principles: secure areas with high ecological integrity ("anchor habitats"), extend these areas, and connect them at the landscape level (Gresswell 1999). An approach that simultaneously considers the condition of a watershed and its associated forests, and the status of aquatic populations (Rieman et al. 2000) appears to offer the best prospects for balancing potentially competing objectives. An approach that simultaneously considers the condition of a watershed and its associated forests, and the status of aquatic populations (Rieman et al. 2000) appears to offer the best prospects for balancing potentially competing objectives. (Gresswell, R.E. 1999. Fire and aquatic ecosystems in forested biomes of North America. *Trans. Amer. Fish. Soc.* 128: 193-221; Rieman, B.E., D.C. Lee, R.F. Thurow, P.F. Hessburg and J.R. Sedell. 2000. Toward an integrated classification of ecosystems: defining opportunities for managing fish and forest health. *Environmental Management* 25(4):425-444)
9. Highest priority should be given to securing high-integrity "anchor habitats" that still closely resemble historic conditions, which can be maintained with prescribed fire alone. In general, protection of remnant old growth pine, from stands to individual trees, should be a top priority, in light of how depleted these trees have become and their importance not only as habitat but also as genetic and scientific resources. (Henjum, M.G., J.R. Karr, D.L. Bottom, D.A. Perry, J.C. Bednarz, S.G. Wright, S.A. Beckwitt and E. Beckwitt. 1994. Interim protection for late-successional forests, fisheries, and watersheds: National forests east of the Cascades crest, Oregon and Washington. *The Wildlife Society Technical Review* 94-2. Bethesda, MD. 245 pp.)
10. One potential problem with understory thinning operations is that the low value of the wood being removed encourages the use of low-cost logging methods. This typically means ground-based equipment, which can have seriously detrimental effects on soils. Soil compaction, which can take decades to recover (Harvey et al. 1989), both reduces plant growth and inhibits infiltration of water, increasing erosion, sedimentation and spring run-off. Fire can also adversely affect soils, but these effects are relatively short-lived (Rieman and Clayton 1997), and should not be presumed to give license to unnecessarily degrade soils during thinning operations. (Harvey, A.E., R.T. Meurisse, J.M. Geist, M.F. Jurgensen, G.I. McDonald, R.T. Graham, and N. Stark. 1989. *Managing Productivity Processes in the Inland Northwest--Mixed Conifers and Pines* in Perry and others, eds., *Maintaining the Long-Term Productivity of Pacific Northwest Forest Ecosystems*. Timber Press, Portland, Oregon; Rieman, B.E. and J. Clayton. 1997. Wildfire and native fish: issues of forest health of sensitive species. *Fisheries* 22 (11): 6-15)

## Biodiversity

1. The "affected environment" and "environmental consequences" sections of the management plan need to discuss what effect project activities could have on gene pools and species diversity
2. The FEIS should contain a detailed analysis of the cumulative effects of past projects, proposed or approved future projects on diversity stability, fragmentation, connectivity with adjacent landscapes, and disruption to ecosystem processes or functions.

### Wildlife

1. Does any of the wildlife information in the DEIS track to the environmental consequences section in a way which helps understand significant impacts? A requirement of the alternatives section in the EIS is to present the significant environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public. FLOW is interested in a healthy and viable population of species. What population impact indicators could be used in the environmental consequences section to estimate significant impacts?
2. The wildlife section of the K-W DEIS provided generic relational impact information about possible wildlife responses to project activities, but there is little information in the section that informs the decisionmaker and the public with a complete and objective evaluation of possible significant environmental impacts from the alternatives.
3. As noted in the DEIS, the K-W Project area contains some of the highest bear populations per square mile in Oregon. Oregon State University researcher William Noble, funded by the Oregon Department of Wildlife, found that: "Huge Douglas-fir trees offer the site that most hibernating black bears select for their traditional long winter's nap ... a failure to provide at least some large trees, stumps and snags could have a long-term impact on bears in the future ... anything that disturbs the process ... increases the demand on this limited energy supply." Noble said the problem is compounded for pregnant females. They face additional survival burdens, including nursing. A den disturbance can jeopardize both mother and cubs. "This dependence of bears on large, old trees is something we've not really understood in the past." The study's general conclusions suggest that policies which protected large snags, preserved mature forests or provided for road closures during October through March would directly benefit denning bears. (Snags, Fallen Log Dens of Choice for Hibernating Bears," Capitol Press, December 28, 1990)
4. Impacts on forest carnivores should be fully explored in the K-W FEIS. The healthy, late-successional habitat within the K-W Planning Area is rare and should be thoroughly studied (with full public disclosure) for presence of forest carnivores and for all impacts from "treatment" alternatives. According to a study of the American Marten, an important forest carnivore, "Logging is commonly regarded as the primary cause of observed distributional losses ... Fire, insects, and disease are other important causes of tree death in the western coterminous United States, but the effects of these disturbances on martens have been studied little. Because logging is unique among these disturbances in removing boles from forests, and because of the importance of boles in contributing physical structure to habitats, logging is likely more deleterious to habitat quality for martens than other disturbances. The geographical

distribution of martens in (the Pacific Northwest) has been dramatically reduced. This reduction is likely attributable to loss of habitat through the cutting of late successional forest ...” (S.W. Buskirk and L.F. Ruggiero, "American Marten," in Ruggiero et al. editors, The Scientific Basis for Conserving Forest Carnivores: American Marten, Fisher, Lynx, and Wolverine in the Western United States, USDA Forest Service, GTR RM-254, Sept. 1994.)

5. There was not analysis in the DEIS regarding the impacts of the K-W Project on Migratory Birds. What will be the impact of the K-W Project on songbirds? Taking of migratory birds is a violation of the Migratory Bird Treaty Act. “[I]t shall be unlawful at any time, by any means or in any manner, to . . . kill . . . any migratory bird, any part, nest, or egg of any such bird.” (16 USC 703) Because the Medford District RMP fails to address impacts of timber sales on migratory neotropical birds, the BLM must address the impacts within an EIS.

### Economics

1. The management plan should discuss the economic consequences of implementing the various alternatives. This could include estimates of job additions or losses attributable to timber management. If timber harvesting activities are proposed, it is important that the management plan consider timber sale economics as a potential management concern for analysis in response to the full public disclosure intent of NEPA and in response to the controversy regarding below-cost timber sales. The management plan should provide clear descriptions of the key assumptions regarding Interdisciplinary Team costs, sale preparation, timber pricing, product valuation, discount rates, rotation lengths, road costs, and road maintenance.
2. NEPA requires a full accounting of a broad array of direct, indirect, and cumulative economic effects of the timber-sale program, including use of methods and procedures to “insure that presently unquantified environmental amenities and values may be given appropriate consideration” [40 C.F.R. 1507.2 (b)]
3. The BLM also should consider ecosystem services in their analysis and present relative values of these services to the public in the FEIS. Listed below are examples of ecosystem services:
  - \*Public forests support a wide variety of recreational opportunities and tourism.
  - \*Public forests support commercial and recreational fisheries, not only within the boundaries of the public lands, but downstream and offshore.
  - \*Public forests provide habitat for many important game species, and so support hunting both within and outside of public lands.
  - \*Public forests supply water for cities and industries downstream from the forests and regulate the flow of water through the streams and rivers.
  - \*Public forests support industries that produce nontimber forest products, such as wild mushrooms, herbs, and medicinal plants.
  - \*Public forests play a role in mitigating changes in global climate, by absorbing and storing vast amounts of carbon.
  - \*Public forests enhance the quality of life of neighboring communities.
  - \*Public forests harbor biological resources that either have value now or have as yet unknown but potentially large economic and social value.
  - \*Public forests harbor biological and genetic resources that can improve the long-term

productivity of all forest land.

\*Public forests provide pest-control and pollination services, by providing habitat for species that prey on agricultural and forest pests, as well as habitat for important pollinators of forest and agricultural plant species.

In addition to these potential socioeconomic contributions, logging on public forests impose negative externalities that must be accounted for in timber-sale decisions:

\*Logging on public forests causes death, injury, and property damage both within and outside of public forests.

\*Logging on public forests increases the risk of wildfire

\*Subsidized timber sales on public forests displaces both timber production on private forest land and substitutes for wood fiber.

4. At every level of decision making related to the timber sale program (program, forest and project level) the BLM fails to account for significant externalized costs of logging. Externalized costs are those costs borne by parties not associated with an economic transaction. In this case, timber sales, as well as those costs not factored into the transaction decision. Public land logging results in a wide array of externalized costs to government, business, and private parties. These include direct costs, such as the costs incurred by downstream water users forced to filter out logging sediments, as well as indirect costs such as the lost revenues to owners of recreation-oriented businesses or decreased property values adjacent to logged over areas. The quantification of such costs is essential for determining whether or not individual timber sales are in the public interest.

#### **Public Disclosure/National Environmental Policy Act**

1. FLOW advocates for the full public disclosure of all foreseeable, direct, indirect, and cumulative environmental impacts of a given management plan. Clear, in-depth analysis of all relevant issues is a requirement for the preparation of a management plan.

Throughout the K-W DEIS there were many statements about impacts without any conclusions about the significance of the effect. Impacts that do not provide any discussion of significance do not inform decisionmakers and the public of what is important.

2. Conclusionary statements about significance without much or any rationale about why they were or were not significant (i.e., impacts statements without an impact methodology) was a problem. Bald conclusions without an objective evaluation of significant environmental impacts, including a logical and coherent record (impact methodology) of how they were derived do not help the decisionmakers and the public understand the trade-offs of management actions.
3. The management plan should describe how the NEPA process will be incorporated into future land management decisions for future site-specific projects. The process for developing a categorical exclusion or an environmental assessment should be discussed. If the effects of a particular activity are significant, an EIS may be warranted. The framework for public involvement in future management decisions should be made clear.

4. If the proposed activities could affect threatened or endangered species, the management plan should include the Biological Assessment and the associated U.S. Fish and Wildlife Service (FWS) or National Marine Fisheries Service (NMFS) Biological Opinion or formal concurrence for the following reasons:
  - A. NEPA requires public involvement and full disclosure of all issues upon which a decision is to be made;
  - B. The Council of Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA strongly encourage the integration of NEPA requirements (40 CFR 1502.25); and
  - C. The Endangered Species Act (ESA) consultation process can result in the identification of mandatory, reasonable, and prudent alternatives which can significantly affect project implementation.
5. Especially concerning the impacts of regeneration, the Medford BLM is not consistently implementing the purpose of an EIS (40 C.F.R. 1502.1) as it relates to significance. An EIS shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.
6. A major problem with much of the analysis in the environmental consequences section was comparing alternatives instead of comparing impacts to the baseline in the affected environment section, or even worse repeating descriptions of alternatives elements without identifying impacts. The confusion may have resulted from two requirements of 40 CFR 1502.14 *Alternatives Including the Proposed Action*, and especially the second requirement. However, neither of the two requirements of developing the alternatives change the requirement of using the affected environment section as the baseline for comparing impacts in the environmental consequences section.

The first requirement of 40 CFR 1502.14, *Alternatives Including the Proposed Action*, is to design a range of reasonable alternatives around the significant planning issues identified during scoping. The alternatives section is the heart of the EIS. The requirement is to design the alternatives to sharply reflect the issues and provide a clear basis for choice among options by the decisionmaker and the public. The baseline for comparing alternatives is the no action and/or current management alternative which for the Kelsey-Whisky Project is Alternative 3.

7. The NEPA evaluation and the consultation process are instrumental in analyzing the effectiveness of project alternatives. The full disclosure mandate of NEPA suggests that the consultation be instigated as soon as possible. Thus, the final management plan and Record of Decision should not be completed prior to the completion of ESA consultation.
8. NEPA requires that an agency provide a detailed analysis of the environmental impacts of the proposed action. 42 USCA §4332(C)(i). As part of this analysis, the agency must include an adequate discussion of cumulative environmental impacts. "Cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions . . ." 40 CFR §1508.7. "Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." *Id.* The K-W Analysis fails to adequately address the cumulative impacts "which result from the incremental impact of the action when added" to the already fragmented state of the project area.

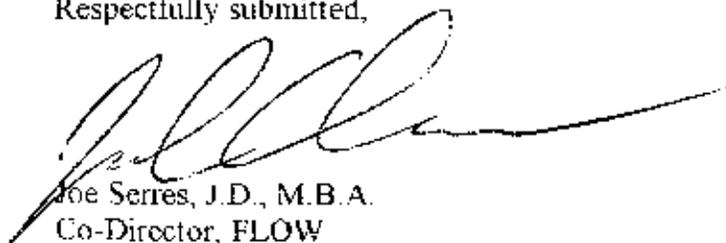
The Ninth Circuit Court has recently remanded Forest Service decisions which did not include a detailed analysis of the cumulative effects of sales in proximity to one another. It is not enough for environmental impact analyses to make general observations about past and future harvest. Analysis of specific timber sales located near each other and a comprehensive evaluation of the environmental effects of these sales when added together must be performed in an EIS. Neighbors of Cuddy Mountain v. US Forest Service, No. 97-35654 (9th Cir., Mar. 4, 1998).

9. The issues to be covered in the FEIS, including riparian effects, forest health, fire, road construction, etc., are very controversial and have a range of scientific opinion, of varying credibility. "Where scientists disagree about possible adverse environmental effects, the EIS must inform decision-makers of 'the full-range of responsible opinion' on the environmental effects. Citizens Against Toxic Sprays v. Bergland, 428 F.Supp. 908, 922 (D.Or 1977). An EIS that fails to disclose and respond to the opinions held by well respected scientists concerning the hazards of the proposed project is "fatally deficient." Seattle Audobon Society v. Moseley, 798 F.Supp. 1473, 1479 (W.D. Wash. 1992). And, in evaluating the reasonably foreseeable impacts of a proposed project in which information is incomplete or unavailable, "the agency shall always make clear that such information is lacking." 40 CFR §1502.22. The EIS *must* include:
- 1) a statement that such information is incomplete or unavailable; 2) a statement of the relevance of the incomplete or unavailable information to evaluating reasonably foreseeable significant adverse impacts on the human environment, 3) a summary of existing credible scientific evidence which is relevant to evaluating the reasonable foreseeable significant adverse impacts on the human environment, and 4) the agency's evaluation of such impacts based upon theoretical approached or research methods generally accepted in the scientific community. (id.)

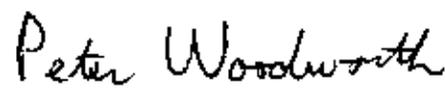
### Summary

Overall, FLOW has very serious concerns about the health of the forests and watersheds within the Kelsey-Whisky Planning Area. The FEIS should be prepared with great detail be in line with the purpose of an EIS- "An EIS is intended to provide decisionmakers and the public with a complete and objective evaluation of significant environmental impacts, both beneficial and adverse, resulting from a proposed action and all reasonable alternatives." FLOW recommends that the deficiencies as outlined above in our comments be remedied in a supplemental DEIS.

Respectfully submitted,



Joe Serres, J.D., M.B.A.  
Co-Director, FLOW  
P.O. Box 521, Ashland, OR 97520  
541-482-2049



Peter Woodworth  
Peter Woodworth  
Project Analyst, FLOW

Nan & Walter Simpson  
4 Meadowstream Ct.  
Amherst, New York 14226

July 4, 2002

Lynda Boodz  
BLM Medford Office  
Medford OR 97504

(8-1)

Dear BLM -

Many swam in the Rogue  
River + visited the True Grey  
hoodless area, I am aware of the  
area unique wilderness value +  
urge the BLM to cancel all  
plans to log this area. I urge  
you to preserve this area - no  
logging, no roads, certainly no

97304+4119

Medford District Office  
3040 Biddle Road  
Medford, OR 97504

no logging of old growth  
trees. <sup>Map</sup> The East <sup>Fork</sup> Whiskey Creek

(2)

ACEC should include the full  
44 acres and road de-  
commissioning should be maximized

Thank you for considering my  
views and for acting to save  
the unique Zone Grey roadless  
area.

Sincerely  
Walter Sims

(9)

6 BASSWOOD LA.  
N. OATS, MN 55127  
7.9.02

Lynda Boody, BLM  
Medford District Office  
3040 Biddle Rd  
Medford, OR 97504

Dear Ms. Boody,

The BLM does not need to log the Lane Grey roadless complex in order to, as the BLM contends, save that area from fire. In fact, the latest scientific research shows that older roadless forests like the Lane Grey are most likely to have low intensity burns - it's the young tree plantations in highly roaded watersheds that burn hot + fast.

Leave the Lane Grey Roadless Area alone - no roads, no logging.

The BLM must stop logging spotted owl habitat.

Clearcutting (the public isn't fooled when you substitute the word 'regenerate') older forests increases fire hazards, so the BLM should not log old trees.

The East Fork Whiskey Creek ACEC should include the full 2,844 acres.

The 10.4 miles of road decommissioning proposed in the DEIS "preferred alternative" is a good start, but should be increased.

LEAVE the LANE GREY ROADLESS AREA  
ALONE - NO ROADS and NO LOGGING.

Sincerely,  
J. Cass

JULY 11, 2002

②

No roads & no logging in  
"Zane Grey Roadless Area"

Eliminating the forest is not an  
appropriate method of eliminating forest  
fires.

Just say no to Kelsey-Whisky  
timber sale.

Sincerely  
GARY

July 8, 2002

(11)

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

Attn: Lynda Boody

I'm horrified to be informed that the Kelsey-Whisky timber sale threatens to clearcut ancient forests and make logging roads into the pristine Zane Grey roadless area. This is camouflaged as "regeneration cutting."

As a former land-owner in Oregon, I'm familiar what happened to the area where we had a rustic cabin. In a mere six years, the rain forest surrounding it was cleared for homes. The clearcutting of the Oregon forests is destroying the beauty and value of your state.

Please don't let this happen. I want my grandchildren to see just a bit what this country looked like before the population explosion. I'd like to visit this wilderness area again. Please don't let it be destroyed.

Sincerely,



Sallie S. Danielson

4244 NE 88th Street  
Seattle, WA 98115  
9 July 2002

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
Attention: Lynda Boody

12

Re: Public comment on proposed Kelsey-Whisky timber sale

Dear Ms. Boody:

I'm writing from out of state, but because the Zane Grey roadless complex is so important and beautiful a forested area, I feel compelled to comment. Succinctly: please leave the Zane Grey Roadless Area alone. Allow no roads there, and no logging.

Whether it is called logging or clearcutting or regenerating, 355 acres of old forests with unique habitat values need to be protected from such activity, and preserved intact. Updated science shows that, in case of fire, older, roadless forests experience low intensity burns, and proposed "regeneration cutting" simply increases fire hazards.

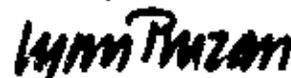
As well, proposals to log critical habitat for spotted owls, salmon and other wildlife should be curtailed. So much habitat destruction has already occurred that the BLM would best serve the future of the country by preserving the irreplaceable habitat for the many rare species that reside in the Zane Grey roadless complex.

Also, please include the full 2844 acres in the East Fork Whisky Creek proposal as an Area of Critical Environmental Concern, so that habitat values of the area are kept intact.

Please also increase the number of miles of road that are to be "decommissioned" in the "preferred alternative" in the DEIS.

Thank you for noting these proposals, for your work on this, and for the possibility that you will protect the long-range future of the ancient forests involved by leaving them intact and alone.

Sincerely,



Lynn Pruzan

Lea Wood  
104 Maple Leaf Farm Rd.  
Underhill VT 05489-9360

9 July 2002

Bureau of Land Management  
Medford District Office  
Medford, OR 97504

Attn: Lynda Boody, Re: Kelsey-'Whiskey Timber Sale

13

**Public Comment:**

No roads; no logging in the Zane Grey Roadless Area due to critical habitat for salmon, spotted owls and other wildlife that depend on older forests.

Clearcutting (euphemistically termed "regeneration cutting" because of the bad name clearcutting has earned) increases fire hazard.

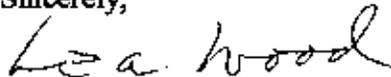
**NO LOGGING OF BIG, OLD TREES!**

The East Fork Whiskey Creek ACED must include the full 2844 acres.

The proposal in the DEIS Preferred Alter Native of 10.4 miles of road decommissioning should be increased.

Such wilderness areas are ever more scarce. They are irreplaceable and the damage of clearcutting irreversible. Please do the right thing; don't let money decide the choice.

Sincerely,



Lea Wood, Member  
Forest Watch

July 9, 2002

David & Julie Occhiato  
446 E. 78th St. #41  
NY, NY 10021

(14)

Dear Lynda Boddy, BLM -

We are writing to ask that you please do everything in your power to stop logging in the Zone Gray Roadless Area. Also, prevent logging in adjacent old-growth and mature forests along the Wild + Scenic Rogue River.

The BLM should cease logging and road building in old-growth ecosystems. Please act now to save these few remaining natural heritage forests essential for recreation, salmon economy and global ecological health.

The East Fork Whiskey Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres.

Please take your role as public servant and nature steward to heart. No logging of old-growth

Thank you — Sincerely —  
David Occhiato / Julie Occhiato

David Rains Wallace  
1568 San Lorenzo Ave.  
Berkeley, CA 94707  
510 528-0827

7/9/02

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97405

15

Dear Sirs:

I support wilderness status protection for the 46,646 acre Zane Grey roadless complex.

I oppose proposed roads and logging as outlined in the draft environmental impact statement for the Kelsey-Whiskey timber sale. Logging of old growth is counterproductive as a means of reducing wildfire risk. The Klamath-Siskiyou region cannot afford to lose any more old growth habitat, especially not in the Wild and Scenic Rogue River watershed.

I support designation of a 2,844 acre East Fork Whiskey Creek Area of Critical Environmental Concern. I also support road decommissioning as proposed in the DEIS "preferred alternative," although I think more than the proposed 10.4 miles should be decommissioned.

Sincerely,



David Rains Wallace

**NORTHWEST ENVIRONMENTAL DEFENSE CENTER**

10015 S.W. Terwilliger Blvd., Portland, Oregon 97219

Phone: (503) 768-6673 Fax: (503) 768-6671

www.nedc.org

(16-1)

Lynda Boody  
Field Manager  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

RE: COMMENTS ON KELSEY WHISKY DRAFT ENVIRONMENTAL IMPACT  
STATEMENT.

July 9, 2002

Dear Ms. Boody,

Enclosed, please find the Northwest Environmental Defense Center's (NEDC) comments on the Kelsey Whiskey Draft Environmental Impact Statement. NEDC is a non-profit, public interest organization dedicated to preserving, protecting, and improving the natural environment in the Pacific Northwest. NEDC is based in Portland, Oregon, and has been working since 1969 to protect the environment and natural resources of the Pacific Northwest by providing legal support to individuals and grassroots organizations with environmental concerns, and engaging in litigation independently or in conjunction with other environmental groups. NEDC's membership consists of a Board of practicing attorneys and law students along with local citizens interested in the shared goal of protecting the environment through legal means. The members of NEDC derive educational, scientific, aesthetic, recreational, spiritual, and other benefits from the protection of our nation's biodiversity.

NEDC is both very pleased and very concerned with the information presented in this draft Environmental Impact Statement (DEIS). We are pleased to see that the Bureau of Land Management (BLM) is taking steps to lower the destructive impacts of forest management projects on wildlife and habitat (i.e. alternative four). However, given the amassing amount of data showing the effects of poor forest management on the local and global environment, it is disheartening to see BLM propose an action such as alternative one and parts of alternative two. We have serious concerns about these actions and we ask that they be heavily revised before the final EIS is published.

16-2

## **Treatment in Spotted Owl Critical Habitat is in Violation of the National Forest Management Act and the Endangered Species Act**

One of NEDC's main concerns with this project is the proposed logging in Northern Spotted Owl critical Habitat. Our organization has been very involved with the process of protecting the Spotted Owl and we feel that the proposed cutting in critical habitat and the road building near owl activity centers is extremely ill conceived. We see no reason why BLM cannot conceive of a plan that does not propose to cut in Spotted Owl critical habitat, especially when BLM must follow the regulations created to implement the National Forest Management Act, namely: 36 C.F.R. § 219(7) (stating a duty to conserve critical habitat), as well as 36 C.F.R. § 219.27(ii)(8) (requirement preventing the adverse modification of critical habitat). Clearly timber harvesting and road building within or near the critical habitat unit violate these regulations and thus serve to make the DEIS against the law. NEDC strongly urges BLM to revise the DEIS and remove all actions within the critical habitat unit and remove the provision for road construction near spotted owl activity centers.

It is the stated policy of Congress that all Federal departments and agencies "shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of [this] purpose." Endangered Species Act of 1973, 16 U.S.C. § 1531(c)(1). The Supreme Court has clearly restated congressional policy stating that, "The plain intent of Congress in enacting this statute was to halt and reverse the trend toward species extinction, whatever the cost." *Tennessee Valley Authority v. Hill*, 437 U.S. 153, 184 (1978). BLM's decision to create a plan that will harm an endangered species and its habitat is inconsistent with the congressional mandate of the ESA.

Under the ESA, BLM has the responsibility to "insure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species..." The proposed plan would significantly exacerbate the degraded habitat conditions for this species that already exists in the Medford District and throughout the Northwest. As a result, this plan is in violation of the ESA.

## **The DEIS is in Violation of NEPA Because it Does not Adequately Represent to the Public that much of the Planning Area is a Roadless Area and Potentially Designatable as a Wilderness Area**

The National Environmental Policy Act was intended to give the public full and accurate information of agency projects so they could make an informed decision about whether they felt their government was doing a good job at such things as managing the public's lands. Intentionally or unintentionally, leaving important facts out of an EA or EIS clearly violate this mandate. The fact that the DEIS fails to mention that much of the planning area is a roadless area and is also a proposed wilderness area is contemptible at best, and potentially in violation of NEPA in general. The public has a right to be fully informed about the effects from the proposed project and without all of the facts, they are denied this right. NEDC asks that BLM

16-3

revise the DEIS to include a section on the effects of the plan on the ability to designate the area as a roadless or wilderness area.

### **The DEIS Lacks Any Discussion of Effects on Riparian Areas within the Planning Area**

We would like to know what affects the plan will have on riparian areas within the Kelsey Whisky planning area. Are these areas present in the planning area? What steps are being taken to safeguard these areas? NEDC would like to see this addressed before the final EIS is published, even if it is just to say that there are none of these areas within the planning area.

### **BLM Should Design the Planning Area Such That They do not Need to Build New Roads**

The DEIS itself states that parts of the planning area have high road densities, while other parts have a low density. NEDC asks that BLM attempt to utilize the current road system to the best of its ability and to plan future actions based on the existing road network. Building new roads is destructive to habitat and to water quality and in most cases are simply not needed. The roads proposed in the DEIS are particularly concerning since one of them comes very close to the Kelsey's Demise Spotted Owl pair, and because ODFW has identified the planning area as having a high concentration of black bears as a result of the low road density. DEIS, pg. 4-11.

It is obvious that BLM can plan a project that does not include building roads, i.e. alternative four, however, NEDC fails to understand why BLM never considers these no new road alternatives as their preferred alternative. NEDC asks that BLM revise the plan to limit or cease new road construction and at the very least move the proposed roads much farther away from the Owl pair and out of current roadless areas so as to not degrade some of the current pristine habitat and wilderness.

### **The DEIS does not Objectively and Adequately Deal with Fire Issues as Required by NEPA nor Does it Discuss the Direct, Indirect and Cumulative Effects of Fire Treatments also Required by NEPA**

The DEIS is entirely one sided with respect to fire management issues and this violates NEPA. The regulations promulgated by the Council on Environmental Quality (CEQ) instituting the National Environmental Policy Act require that the forest service "rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives that were eliminated from detailed study, briefly discuss the reasons for their having been eliminated." 40 C.F.R. § 1502.14(a). With respect to fire management, the DEIS does not take into account many of the scientific studies that show current management activities actually increase the size and destructiveness of forest wildfires because, among other things, the open spaces allow for higher wind speed the serves to spread the fires quicker and more unpredictably. If BLM is unable to find this studies, NEDC will be happy to provide a number of them to your office for you to review.

The DEIS also fails to disclose the direct, indirect, and cumulative impacts from this and other burning projects in the planning area. The DEIS fails to analyze the impacts to soil, water quality, and wildlife as a result of burning a large portion of the watershed. This serious

16-4

oversight violates the National Environmental Policy Act (NEPA) regulations, which requires a direct, indirect, and cumulative impacts analysis in each environmental assessment. 40 C.F.R. §§ 1508.7, 1508.8 (1998). Importantly, BLM did not assess the cumulative impacts to wildlife – denning mammals, plants, amphibians, and birds, among others – as well as on seed propagation, soils, and aquatic resources from burning not only the Kelsey Whisky planning area, but also the area adjacent to the Kelsey Whisky area. NEDC questions what effects there will be on these plant and animal species if their habitat (i.e. duff and ground cover areas) is repeatedly burned, since some species in the planning area are dependent on more moist, shady, or dense conditions.

It also seems that the BLM does not yet possess a burn proposal for the Kelsey Whisky area. A fire proposal or burn plan is an integral part of the purpose and need of the proposed project, and without one, it is impossible to determine whether the proposed prescriptions are appropriate for each treatment unit. The regulations implementing NEPA require the agency to vigorously assess all aspects of a proposed project, which in this case includes a prescribed burning plan. 40 C.F.R. § 1502.14(a).

The DEIS also contains no site-specific descriptions of the level of fuels in each project unit proposed for treatment. BLM must provide this data so that the public can make an informed decision about the necessity of proposed burn and fire treatment projects. The failure of the BLM to provide a site-specific description of the fuels level in each unit, detail the mitigation prescriptions for the prescribed burning, and describe the actual on-the-ground impacts from burning the vast majority of the planning area that contains sensitive forestland, deprives the public and the decisionmaker of the information necessary to make a reasoned decision regarding the project. In addition, the lack of site-specific analysis also violates NEPA. *Idaho Sporting Congress v. Thomas*, 137 F.3d 146 (9<sup>th</sup> Cir. 1998). Until these deficiencies are cured, the DEIS is inadequate and the project must be revised.

#### **The DEIS Discussion of Cumulative Effects is Severely Lacking and Thus Violates NEPA**

The brief attention given to the cumulative impacts of the Kelsey Whisky Landscape Management Plan is inadequate and fails to meet NEPA's requirement for high quality scientific analysis that would satisfy the "hard look" standard. *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 353 (1989); *Blue Mountains Biodiversity Project v. Blackwood*, 16 F.3d 1208 (9<sup>th</sup> Cir. 1998) *cert. denied*; *Ochoco Lumber Co. v. Blue Mountains Biodiversity Project*, 119 S.Ct. 2337 (1999). The courts have also held that the failure to conduct a cumulative impacts analysis is fatal to a project. *Neighbors of Cuddy Mountain v. United States Forest Serv.*, 137 F.3d 1372 (9<sup>th</sup> Cir. 1998); *Idaho Sporting Congress v. Thomas*, 137 F.3d 1146 (9<sup>th</sup> Cir. 1998); *Muckleshoot Indian Tribe v. U.S. Forest Serv.*, 177 F.3d 800 (9<sup>th</sup> Cir. 1999).

There is no analysis in the DEIS regarding how logging, roading, and fire management activities affect the planning area. NEPA requires this analysis, and the failure to provide it violates the law. 40 C.F.R. § 1508.7. The lack of an adequate cumulative impact analysis to assess the fragmentation of habitat corridors and late/old structure (LOS), degradation of water quality, impacts to plant and animal species, and soil health is especially problematic given the cursory admissions throughout the administrative record that the analysis area has been highly impacted

(16-5)

by past logging and other management activities. Again, simply stating that other activities are occurring or will occur does not suffice as an adequate cumulative impacts analysis.

### BLM Should Consider No Regeneration Harvests for the Planning Area

The DEIS states that timber production is a primary objective of the General Forest Management Area, by this term we think BLM is referring to the Matrix lands, as the Northwest Forest Plan does not refer to general forest management areas. DEIS, pg. vii. However, the Matrix lands do not have the primary objective of timber production, rather this land has a number of different functions. Matrix lands are "the area in which most timber harvest and other silvicultural activities will be conducted." Northwest Forest Plan, ROD pg. 7. But, unlike the definition of Timber Emphasis, the term used in the old LRMP's, there is no actual command that timber harvest is the primary goal of the matrix. This is direct conflict with what the DEIS states on page vii. in the purpose and need section and thus needs to be revised in order to be correct.

While the DEIS states that timber production is the primary objective, the NWFP states that, "stands in the matrix can be managed for timber and other commodity production, and to perform an important role in maintaining biodiversity." *Id.*, S&G pg. B-6. Thus, matrix can be managed for timber production, but there is nothing saying they must be managed for timber production. Also, an equal, not secondary, goal for matrix is in maintaining biodiversity. Thus, it would equally correct to describe matrix as having a "Biodiversity Emphasis," as it would to describe matrix as having a "Timber Emphasis."

Furthermore, twenty-seven percent of matrix lands are in either Tier 1 or Tier 2 Watersheds. (S&G at B-18). The goal of Tier 1 Watersheds is fish habitat conservation, and the goal of Tier 2 Watersheds is to preserve high quality water. *Id.*, S&G pg. B-19. Even if the other 78% of matrix could be defined as having a Timber Emphasis, the 27% that is in Tier 1 or 2 Watersheds clearly has an "emphasis" of fish habitat or water quality preservation. Thus BLM needs to revise the purpose and need section of the DEIS so as to not mislead the public into thinking there is some set of strict "requirements" that BLM must meet for timber production. BLM should find it morally reprehensible to resort to this kind of deception in order to cut down the public's trees. NEDC feels that Oregonians and the American public would rather see quality forest management than higher timber production volume off of our lands.

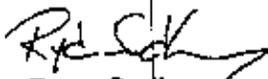
Thus, NEDC asks that BLM revise the Kelsey Whisky plan so that it does not include any of the planned destructive regeneration harvests that have caused the devastation on the forests in the first place. We ask that the BLM, as well as the Forest Service, begin to use some foresight in the planning process and realize that it is these types of destructive forest management activities that have caused the rapid decline in wildlife habitat and water quality throughout the Northwest and the country. If these agencies are going to give away the American public's trees at pennies on the dollar, than at least they can do it in a way that does not destroy the possibility of continuing to sustain forests with actual wildlife.

(16-6)

**Conclusion**

NEDC asks that BLM revise this EIS to so that it is in compliance relevant law and regulations. Again, NEDC also strongly urges BLM, and other agencies, to begin to use some much needed commonsense and foresight when making its plans. NEDC thanks BLM for the opportunity to comment on this DEIS and looks forward to commenting on the revised version of it.

Sincerely,



Ryan Sudbury  
Law Clerk, Northwest Environmental Defense Center

247 Wadsworth Ave Apt 6i  
 New York, N.Y. 10033  
 July 12, 2002

Bureau of Land Management  
 Medford District Office  
 3040 Biddle Road  
 Medford, OR 97504  
 Attn: Lynda Boody

(17)



Dear Lynda Boody: This letter seeks to encourage the BLM to stop logging (especially clearcutting) and road building in the old growth forests of Oregon including the Zane Grey Roadless Area and the East Fork Whisky Creek watershed.

These are areas of wondrous biodiversity and scenery and ought to finally now receive protection. Oregonians can this way retain a critical part of their heritage and Easterners, like myself, can still look forward to seeing them in the not too distant future. Indeed, many of the species whose limited habitat would be reduced still further are beautiful but quite endangered as are the unique natural communities of such species which which ancient forests now represent. Let's keep them always!

It is my understanding that the BLM seeks to log these ancient cathedrals of creation to protect them from fire. But doesn't recent study show such old, roadless forest areas to be more resistant to fire than the younger, roaded ones that replace them?

If these forests need to be protected from fire by removal of timber, let it be of brush or of already-fallen timber that is not being used as habitat and let that be removed without new roads to be processed in Oregon for consumption locally by Oregonians.

In a time of vanishing species of wildlife, and of Global warming, intact, diverse forests must be vigilantly protected. Ultimately, a living old forest does more for people than what's obtained by logging it! Thank you for your courageous consideration.

Sincerely,

*Ted Scouries*

Ted Scouries

18

July 9, 2002

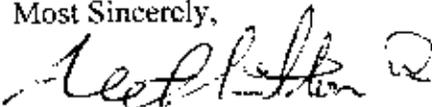
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR. 97504  
Attn. Lynda Boody

Dear Ms. Boody,

Please register and record my opinion that the Zane Grey roadless area should be left alone. Logging and road building should not occur anywhere near the area. There simply are no justifiable or defensible reasons for invading Zane Grey roadless area.

Thank you very much for taking the time to record my opinion against logging or road building in or near the Zane Grey roadless area.

Most Sincerely,



Alex Hamilton III  
North Fork Tackle Co.  
P.O. Box 9  
McCall, ID. 83638  
email: [alexh@ctcweb.net](mailto:alexh@ctcweb.net)

716 E. 11th St.  
New York, NY 10009  
July 10, 2002

(19-1)

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
Attn: Lynda Boody

Dear Ms. Boody:

I am writing to urge you to  
stop the Kelsey-Whisky timber  
sale. I spend a great deal  
of time in southern Oregon  
and strongly feel that the  
Zane Grey area should remain

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Roadless and unlogged.

I ask for this because I am concerned about out-of-control forest fires (we in New York City are blanketed in smoke right now from fires in Quebec!), and that young woods (planted trees) will burn faster and hotter than old-growth.

And that certain species are suffering so greatly from habitat destruction (marbled murrelet, spotted owl, Coho salmon) that

further intro  
them extinct

Please, ↓

logged.  
1

(19-3)

further intrusion could render them extinct.

Please, Ms. Boody, record this: I request that the East fork Whiskey Creek ACEC\* include all 2,844 acres.

Thank you.

Sincerely,  
Judith K. Canera  
JUDITH K. CANERA

\*Area of Critical Environmental Concern

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08 July 2002  
Jeremy Kamil  
909 Alvarado Ave #29  
Davis, CA 95616

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
ATTN: Lynda Boody

20

Dear Ms. Boody and BLM representatives,

I would like to enter the following comments concerning the proposed Kelsey-Whisky timber sale.

The Zane Grey Roadless area should be left intact. No road construction or improvement should be allowed to take place inside the Zane Grey Roadless area. No logging should take place inside the Zane Grey Roadless Area. The Zane Grey Roadless area is very valuable for recreation and wildlife and thus should not be mitigated to provide board feet of timber.

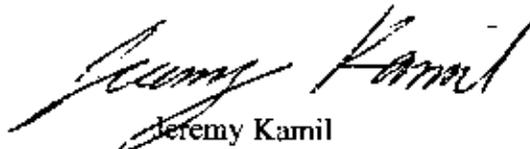
Fire danger is not an adequate reason to log the Zane Grey Area or other <sup>sensitive</sup> areas proposed in the Kelsey-Whisky timber sale. It has been scientifically established that "regeneration cutting" only increases fire hazards by exposing the understory to direct sunlight, causing the forest and associated litter to become much more dry than it was when shaded by large conifers. For fire control, controlled burns have a much better record in preventing catastrophic wildfires than do directed logging. I hope that BLM can explore controlled burns as an alternative to logging.

The BLM should desist from logging within or near spotted owl critical habitat. Spotted owls, native salmon and other important wildlife that need older, more mature forests to survive cannot tolerate further habitat destruction or modification.

The East fork Whisky Creek proposed Area of Environmental Concern should include the full 2,844 acres and no less.

The 10.4 miles of road decommissioning proposed in the DEIS 'preferred alternative' is a decent place to start, but should be increased.

Thank you for your time and consideration.

  
Jeremy Kamil

21950 County Road 445  
Bovey, MN 55709  
9 July 2002

Attn: Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

(21)

Dear Ms. Boody:

I am writing as a private citizen and former resident of the Pacific Northwest to ask the BLM not to carry out the proposed Kelsey-Whisky timber sale.

The Zane Grey Roadless Area is a national natural treasure. It's location next to the Wild Rogue Wilderness makes this roadless area all the more important both as habitat for rare wildlife, including the northern spotted owl, and for wilderness recreation for people.

I disagree very strongly with the proposition that clearcutting will decrease fire risk. As a resident of Washington State for 27 years, I have seen first hand that catastrophic fires occur primarily in dense, second-growth forests of small, closely-spaced trees. Clearcutting old forests has increased the risk of such fires.

The Kelsey-Whisky timber sale is particularly inappropriate at this time as the entire Zane Grey Roadless Area may be considered by the Oregon congressional delegation for protection as wilderness.

While I do not want to see any clearcutting or road construction in the Zane Grey Roadless Area, I do heartily approve of the proposal to decommission 10.4 miles of road in the preferred alternative of the DEIS.

Thank you for considering my views.

Sincerely,



William K. Steele

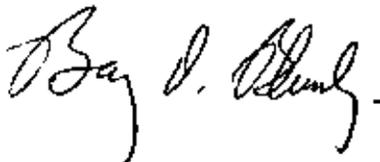
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

22

Attention: Lynda Boody

Re: Public Comments on Zane Grey Roadless Area Logging Proposal

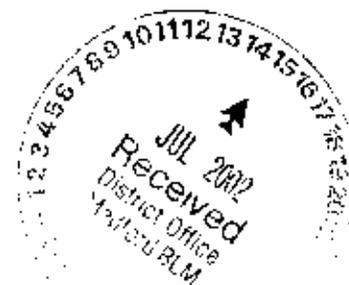
The Zane Grey Roadless Area is an Oregon heritage as well as a heritage for all citizens in the United States. The area is a critical habitat for many species of wildlife. This critical area should be left alone and have no roads and no logging. Regeneration cutting of older forests, such as the Zane Grey, which experience low intensity burns, increases fire hazards. With all the wildfires in the past few months in both the United States and Canada, it should be clear that logging big, old trees in this BLM area should not take place. Please include my comments with the proposal on the Zane Grey Roadless Area.



Barry D. Blumberg  
1329 Bolton Street  
Baltimore, Maryland 21217

Jim O'Neil  
136 NW 21<sup>st</sup> St. #2  
Corvallis, OR 97330

7/12/02



Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

23-1

Dear Ms. Boody,

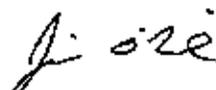
These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

- The Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!
- The Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!
- The East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres
- The logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully submitted,

  
Jim O'Neil

136 NW 21st St. #2  
Corvallis, OR 97330

July 9, 2002

Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

23-2

**Subject: Public Comment on proposed "Kelsey Whisky" timber sale: Opposed!**

Dear Lynda Boody,

I am *strongly* opposed to the "Kelsey Whisky" timber sale.

The Zane Grey Roadless Area should be protected – no road building (temporary or permanent) and no logging.

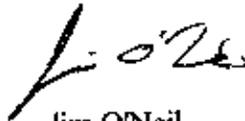
The Kelsey-Whiskey sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!

The East Fork Whiskey Creek Area of Critical Environment Concern (ACEC) should include the full 2,844 acres.

The logging of old-growth and mature forests destroys habitat while increasing the fire risk. Science shows that road-less, mature and old-growth forests are more fire-resistant than forests that have been logged, roaded and "managed."

Please consider this my official comment.

Sincerely,



Jim O'Neil



**Main Office**  
5825 N. Greeley  
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(f): 503.283.0756  
info@onrc.org

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**Southern Field Rep.**  
HC 63 Box 332  
Chiloquin, OR 97624  
(v): 541.783.2206  
(f): 707.464.3991  
ww@onrc.org

Sherwood Tubman  
Medford BLM  
3040 Biddle Road  
Medford OR 97504  
Or110mb@or.blm.gov

July 11, 2002

24-1

Subject: ONRC comments on Kelsey-Whisky DEIS

Dear BLM:

Please accept the following comments from Oregon Natural Resources Council concerning the Kelsey-Whisky DEIS dated March 2002.

Preferred alternative (2) would:

- **Regen harvest**— 355 acres old growth
- **Commercial Thin**— 969 acres of old growth
- **Commercial and Non-commercial Density Management**— 510 acres (329 commercial and 181 non-commercial)
- **Pine Enhancement**—1,091 acres, localized thinning around selected pine trees, creation of small openings (less than ¼ acre, no more than 2 per acre) around other pines or groups of pines.

**DEIS fails to address impacts to Roadless Values:**

The Zane Grey Roadless Area is the largest forested BLM roadless area in the country. The EIS does not discuss this roadless area, except in its discussion of scoping comments received. The DEIS does not discuss the impacts of the proposed logging on roadless values referenced in the Forest Service roadless area conservation EIS. See the attached map documenting the extent of the Zane Grey and other nearby *de facto* roadless areas.

Roadless areas greater than about 1,000 acres, whether they have been inventoried or not provide valuable natural resource attributes that must be protected. These include: water quality; healthy soils; fish and wildlife refugia; centers for dispersal, recolonization, and restoration of adjacent disturbed sites; reference sites for research; non-motorized, low-impact recreation; carbon sequestration; refugia that are relatively less at-risk from noxious weeds and other invasive non-native species, and many other significant values. See Forest Service Roadless Area Conservation FEIS, November 2000. This project involves activities in such unroaded areas. The NEPA analysis for this project does not adequately discuss the impacts of proposed activities on all the many significant values of roadless areas.

An EIS is needed to consider the significant environmental impacts of proposed activities in roadless areas. The agency should consider the effects of this project on uninventoried roadless

areas like the Rogue River National Forest considered unroaded areas in the recent Mill Creek DEIS. (Note: Although the Rogue River National Forest should be commended for considering uninventoried roadless areas in an EIS and for developing an alternative that deferred entry into unroaded and old-growth areas, they did not do a good job of analyzing the impact of the proposed project on the values embodied by the uninventoried roadless areas.)

Unroaded areas greater than about 1,000 acres, whether they have been inventoried or not provide valuable natural resource attributes that must be protected. These include: water quality; healthy soils, fish and wildlife refugia; centers for dispersal, recolonization, and restoration of adjacent disturbed sites; reference sites for research; non-motorized, low-impact recreation; carbon sequestration; refugia that are relatively less at-risk from noxious weeds and other invasive non-native species, and may other significant values. See Forest Service Roadless Area Conservation FEIS, November 2000. The NEPA analysis for this project does not adequately discuss the impacts of proposed activities on all the many significant values of roadless areas.

While inventoried roadless areas receive mandatory attention per the Roadless Area Conservation FEIS, the Forest Service has previously acknowledged that unroaded areas smaller than the generally accepted 5,000 acres are significant as well. See 36 CFR 219 Planning Regulations. For example, as illustrated in the Roadless Area Conservation FEIS (FEIS Fig. 3-3, p. 3-5), there are numerous inventoried roadless areas that are less than 5,000 acres. In the West alone there are over 650 inventoried roadless areas ranging from 1,001-5,000 acres (FEIS Fig. 3-3, p. 3-5). Clearly, these inventoried roadless areas and unroaded areas of 1,000 acres or greater share many of the same characteristics as the larger roadless areas and therefore constitute a compelling interest as well.

### **OLD GROWTH MUST BE PROTECTED**

Since the 2000 S&M FEIS did not include an adequate range of alternatives, all logging of large trees should stop until an old-growth protection alternative is fully developed and considered.

Old growth is defined by ICBEMP as:

1. Large trees for species and site.
2. Wide variation in tree sizes and spacing.
3. Accumulations of large-size dead standing and fallen trees that are high relative to earlier stages.
4. Decadence in the form of broken or deformed tops or bole and root decay.
5. Multiple canopy layers.
6. Canopy gaps and understory patchiness.

<http://www.icbemp.gov/pdfs/sdeis/Volume2/Appendix17a.pdf>

The multiple values of old-growth and the adverse consequences of logging have not been adequately considered in the DEIS.

## **Regeneration harvest fails to meet the Purpose and Need**

The DEIS asserts that thinning is needed in the Late Successional Reserve to “reduce risk of catastrophic stand replacing wildfire, promote retention and enhance late-successional forest habitat characteristics.” EIS, 1-3. Proposed regen harvest does not meet these goals. In fact, it does just the opposite. Timber harvest is known to increase fire risk by removing large pieces of wood that are less prone to burn while leaving small fuels which are a much greater fire risk.

### **Spotted owls:**

Proposed logging will harm spotted owl critical habitat. Critical habitat is designated to aid in recovery efforts but there is no spotted owl recovery plan yet. This project may adversely impact recovery options for the spotted owl.

Proposed logging in spotted owl activity centers would adversely impact Threatened spotted owls in violation of the Endangered Species Act.

The DEIS fails to discuss edge effects, and disclose how many acres will be affected by them in forest surrounding regen and CT. Also no analysis of blowdown and how many acres outside units could be affected.

### **Connectivity:**

The EIS identifies two “areas of interest for connectivity to other watersheds.” EIS, 3-12.

1. East Fork Kelsey Creek and West Whisky Creek watersheds meant to link the Galice/Fish Hook LSR (in the planning area) to East and West Forks Whisky Creek and part of the Grave Creek watershed “identified for connectivity to the LSR” to the Galesville/South Umpqua LSR. However, the project proposes regen harvest, commercial thinning, and Sugar Pine Enhancement throughout this area which will degrade this area of its connectivity qualities.
2. North Fork Kelsey Creek and Kelsey Creek watersheds meant to link the Galice/Fish Hook LSR to the Bobby Creek RNA to the north. This area is also proposed for regen and commercial thinning though not to the extent that these are planned in #1.

### **Roads**

Preferred alt. would build 1.9 miles of new temporary roads. 0.6 miles into LSR/roadless. Other temp. roads extend from existing roads into possible roadless area. The DEIS proposes to use action alternatives as a mode for completing “past due (deferred)” road maintenance. EIS, 4-26.

Nothing is worse for sensitive wildlife than a road. Over the last few decades, studies in a variety of terrestrial and aquatic ecosystems have demonstrated that many of the most pervasive threats to biological diversity - habitat destruction and fragmentation, edge effects, exotic species invasions, pollution, and overhunting - are aggravated by roads. Roads have been implicated as mortality sinks for animals ranging from snakes to wolves; as displacement factors affecting animal distribution and movement patterns; as

population fragmenting factors; as sources of sediments that clog streams and destroy fisheries; as sources of deleterious edge effects; and as access corridors that encourage development, logging and poaching of rare plants and animals. Road-building in National Forests and other public lands threatens the existence of de facto wilderness and the species that depend on wilderness.

<http://www.wildrockies.org/WildCPR/reports/ECO-EFFECTS-ROADS.html>

See also NRDC Report: "End of the Road: The Adverse Ecological Impacts of Roads and Logging: A Compilation of Independently Reviewed Research" (1999) which discusses the fact that roads:

1. Harm Wildlife
2. Spread Tree Diseases and Bark Beetles
3. Promote Insect Infestations
4. Cause Invasion by Harmful Non-native Plant and Animal Species
5. Damage Soil Resources and Tree Growth
6. Adversely Impact Aquatic Ecosystems

### Temporary roads

For the semi-permanent roads that will be tilled, BLM's own soils scientist has little faith in the restorative value of this technique. He says: "What I have seen so far have been nothing more than modified rock rippers and little lateral fracture of the soil occurs and the extent of de-compacting is very limited." Coos Bay BLM, Big Creek Analysis file, section F, Soils Report, page 4.

BLM assumes that temporary and semi-permanent new roads will have no effect because they are temporary. BLM has shown no scientific evidence for this assumption. In fact, scientific research has shown exactly the opposite. Effectiveness of Road Ripping in Restoring Infiltration Capacity of Forest Roads. Charles H. Luce, USDA Forest Service Intermountain Research Station, 1221 S. Main, Moscow, ID 83843. September 1996. *Restoration Ecology*, Vol. 5, No. 3, page 268.

Research results, published in *Restoration Ecology*, shows there is nothing temporary about temporary roads, and that ripping out a road is NOT equal to never building a road to begin with. "The saturated hydraulic conductivity of a ripped road following three rainfall events was significantly greater than that of the road surface before ripping... most saturated hydraulic conductivities after the third rainfall event on a ripped road were in the range of 22 to 35 mm/hr for the belt series and 7 to 25 mm/hr for the granitics. These conductivities are modest compared to the saturated hydraulic conductivity of a lightly disturbed forest soil of 60 to 80 mm/hr." id. Even this poor showing of restoring pre-road hydrologic effects worsened with repeated rainfall. "Hydraulic conductivity values for the ripped treatment on the granitic soil decreased about 50% with added rainfall ( $p(K1=K2)=0.0015$ ). This corresponded to field observations of soil settlement and large clods of soil created by the fracture of the road surface dissolving under the rainfall... The saturated hydraulic conductivity of the ripped belt series soils also dropped from its initial value. Initially, and for much of the first event, the ripped plots on the belt series soil showed no runoff. During these periods, run-off from higher areas flowed to low areas and into

24-5

macropores.... Erosion of fine sediment and small gravel eventually clogged these macropores... Anecdotal observations of roads ripped in earlier years revealed that after one winter, the surfaces were nearly as solid and dense as the original road surfaces." Id. Even though ripped roads increase water infiltration over un-ripped roads, it does not restore the forest to a pre-road condition. "These increases do not represent "hydrologic recovery" for the treated areas, however, and a risk of erosion and concentration of water into unstable areas still exists." Id.

**Weeds**

Opening up the canopy and disturbing the soil through road building and logging as proposed in this project could spread non-native weeds far and wide. The invasive weed sites in the analysis area and along all log and gravel haul routes should be fully inventoried and documented as part of the NEPA process for this project . In the absence of valid and complete weed survey information, harvest and road and fuel treatment activities planned as part of this project might exacerbate the problem instead of contain it.

We find it highly unlikely that conducting ground disturbing activities over so many acres of this planning area will not make the weed problems worse instead of better. These weeds are "a slow motion explosion" that should not be taken lightly. It is often better to just close roads and avoid ground disturbing activities while sending crews in to do hand-pulling of weed infestations as necessary.

**Port Orford cedar:** There are small populations of Port Orford Cedar located in Mule Creek drainage. *P. lateralis* root disease is present in the population growing in upper portion of Mule Creek. CT unit 22A appears to be in the headwaters of Mule Creek. There is a potential for infection from logging in tribs to Rogue which could affect populations along the Rogue from *P. lateralis*-infected water flowing downstream. The DEIS contains no discussion of RMP management guidelines or any mitigation to stop spread of root disease and no discussion of potential effects to disease free trees due to project.

**SOILS CONCERNS**

The DEIS contains no site-specific analysis of compaction or erosion potential from any action alternative as required in the Medford RMP.

Scarification, ripping, and subsoiling does not alleviate the following negative impacts, therefore not completely mitigating:

- compaction of soil and alteration of the soil ecosystem;
- alteration of hydrology, water storage, flow, timing, from soil compaction;
- alteration or loss of native plant communities, and tendency to create conditions which favor noxious weeds or other non-native plants;
- disruption of soil foodweb and biotic communities that serve important soil functions and processes such as aeration, nutrient cycling,

Soil productivity must be zealously guarded in order to protect our forests for future generations. This project will cause unacceptable impacts to soil resources. Use of ground-based logging

24-6

equipment almost always compacts soil causing reduced site productivity, drastically altered soil food web relationships, reduced infiltration, and increase surface runoff. Spring burning can also be very harmful to soil and the thousands of creatures that live all or part of their lives in the soil profile. The EA needs to consider these impacts and consider alternative ways to avoiding these impacts.

Ground-based logging causes higher incidences of root damage and scarring of residual trees (compared to skyline systems). Kellog, L., Han, H.S., Mayo, J., and J. Sissel, "Residual Stand Damage from Thinning— Young Stand Diversity Study," Cascade Center for Ecosystem Management.

Soil disturbance caused by logging also causes erosion that adversely impacts both soil and water resources. The existing level of soil disturbance has not been measured and disclosed in the EA so the Agency cannot say with any factual basis whether forest plan standards will be met. This is arbitrary and capricious. Existing soil impacts must be measured and future impacts estimated so that an adequate cumulative effects analysis can be prepared and included in a supplemental EIS.

An EIS is needed to address these significant soil issues.

#### **Cumulative Effects:**

The DEIS contains no discussion of how many acres have been degraded in the past by other timber sales or whether they are regenerating. Also, EIS says "[a]ll of the old-growth timber on private land has been cut. State of Oregon lands have also harvested most of their larger trees." EIS, 3-18. Not dealt with in cumulative effects section. Some private land is adjacent to owl core areas including one in 33S, 8W, section 26/27.

In Affected Environment, Late-Successional Habitat, the EIS admits "[p]artial cuts in East Fork Kelsey Creek and Quail Creek areas have substantially increased brush component placing these areas at greater risk of stand replacement fire." EIS, 3-11. No discussion of these cuts or sales in cumulative effects section.

There is mention of "past timber harvests on federal lands" in Mule Creek, Upper Kelsey Creek and Long Gulch subwatersheds in the Cumulative Effects section. (p. 4-31) but there is no site specific analysis of how much was cut, when or whether it has regenerated to any degree, nor any mention of East Fork Kelsey Creek or Quail Creek harvest. East Fork Kelsey Creek has three regen units proposed. This also calls the Fires and Fuels component of purpose and need into question. Claim they need this project to reduce risks of catastrophic wildfire, admit that past harvest has exacerbated fire risk, but plan to regen and commercially thin thus increasing risk of catastrophic wildfire.

**Survey and Manage:** Surveys for species have not been completed. Without adequate survey information (including survey results and disclosure of protocol used), there is no analysis of the true effects of the project and effects cannot be known by decisionmaker or the public.

**The FEIS must consider the survey information that is missing from the DEIS.**

The DEIS is presumptively inadequate because it didn't include the results of all the required wildlife surveys for red tree vole, Chace Sideband (*Monadenia chaceana*, Oregon Shoulderband (*Helminthoglypta hertleini*), Del Norte salamander, Blue-grey taildropper slug, Papillose tail-dropper slug, Oregon megomphix, *Cypripedium fasciculatum*, *Bryoria tortusa*, *Dendriscoecaulon intricatulum*, *Platismatia lacunose*, *Pseudocyphellaria rainierensis*, *Ramalina thrausta*, *Usnea longissima*, *Encalypta brevicolla* var. *crumiana*).

In the FS and BLM's November 1, 1996 joint directive the agencies agree that the survey results are necessary to making an informed decision, and the agencies agree that the survey results represent significant NEPA information.

"The intention is to accomplish surveys prior to the design phase since the presence or absence of Survey and Manage species is a significant piece of information and should be available prior to the signing of the National Environmental Policy Act (NEPA) document."

(emphasis added). Nov 1, 1996 directive from BLM Oregon and California state directors and PNW and PSW Regional Foresters, Re: Implementation of Survey and Manage Component 2 "Survey Prior to Ground Disturbing Activities" Standard and Guideline, Attachment 1-2.

Another joint directive repeats the statement above then adds:

"The clear intent of Component 2 surveys is to have information about these species for use in project analysis, formulation of alternatives, evaluation of effects, and decision making. . . . we conclude that all Component 2 requirements should be met prior to the decision."

Sept 11, 1998 directive from BLM Oregon and California state directors and PNW and PSW Regional Foresters, Re: Implementation of Survey and Manage Component 2 and Protection Buffer Standards and Guidelines Regarding "Survey Prior to Ground-Disturbing Activities" <http://www.blm.gov/nhp/efoia/or/fy98/IMS/m98099.htm>

**We support the proposed ACEC**

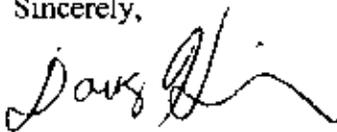
An ACEC is proposed for the East Fork Whisky Creek subwatershed to protect the Tanoak/Douglas-fir/Salal/Evergreen Huckleberry plant group not currently under the Oregon Natural Heritage Plan. Alt. 2 proposes 1,676 acres. Alt. 4 proposes 2,843 acres. Other benefits include protection of old growth habitat, undeveloped character, unique geology and soils and high water quality. No scheduled timber harvest, firewood gathering prohibited, trees cut for any trail construction to remain on site. Appendix 10 outlines proposed management plan. Road construction would be prohibited. RNA proposed for 91 acres within the ACEC.

We incorporate by reference the insightful comments of the Siskiyou Regional Education Project, attached.

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24-8

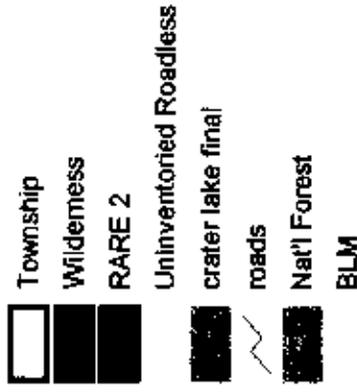
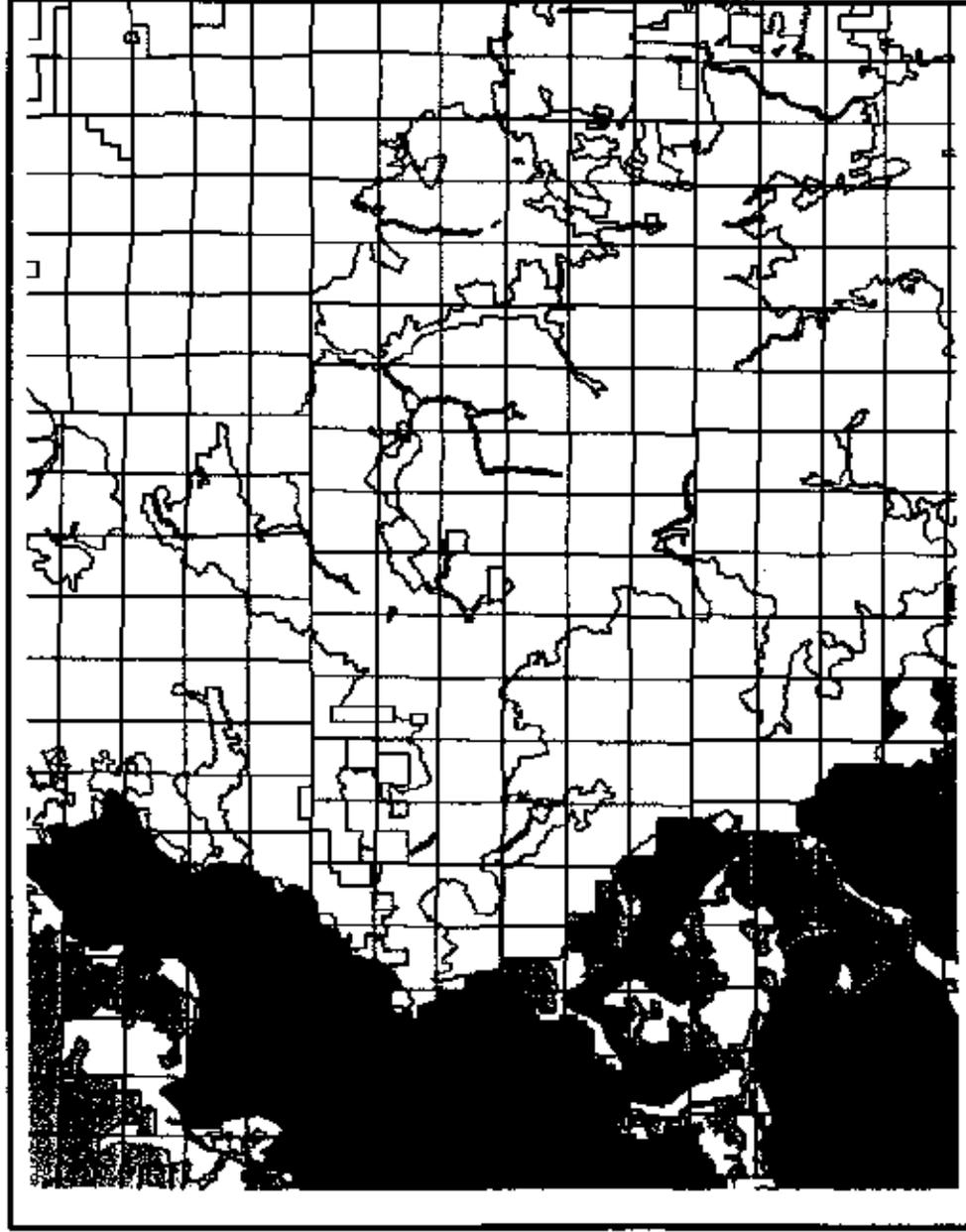
Sincerely,



Doug Heiken

Encl. roadless map  
SREP comments

# Zane Gray Roadless Area - Kelsey Whiskey Project Area



249



SREP comments

24-10

Ron Wenker  
District Manager  
Medford District  
USDI Bureau of Land Management  
3040 Biddle Road  
Medford, Oregon 97504

July 10, 2002

Regarding: Kelsey Whisky Draft EIS

Dear Mr. Wenker:

**Recommendation:** Alternative 4 is clearly the action alternative that best protects the resources of the Planning Area. However, due to reason explained in the following text, Siskiyou Project recommends selection of the "No-action alternative". We are intrigued by the possibility of an Alternative very similar to Alternative 4 but with modifications - {such as a 1) the mapping and on-ground delineation of riparian reserves, 2) a diameter limit to prevent the degradation of late-successional habitat and the loss of older, fire resistant trees and 3) sugar pine treatments that were confined to the crown area of the pines}. Siskiyou Project would like to engage in a dialogue with the Medford District to explore such possibilities.

The Planning Area contains many land allocations including Matrix lands. The BLM is charged to manage these lands for, among other outputs, timber production. However, the Agency and the Decision-maker has considerable discretion and latitude as to where and when to harvest timber on the Matrix lands (timber management is a management that necessarily involves long time periods) and discretion as to the age and size of trees to be harvested. After over 50 years of poorly regulated logging of large and old trees, it is prudent to defer such harvest especially since the same 50 years of fire suppression has created an abundance of smaller trees.

#### **1. Aquatic Habitat, Fish**

a. The proposed decisions (DEIS 1-9) are flawed because they identify lands for commercial logging and vegetation removal (item 4, maps 4,5,6) without first identifying riparian reserves as required in the ROD. Before issuing a decision the BLM must provide the public maps of all stream channels and unstable areas requiring riparian reserves and include a decision in the final EIS designating these mapped areas as riparian reserves. Riparian reserves are not shown on Map 7 as stated on page 3.3. Map 7 only shows some stream channels. The DEIS does not illustrate the extent of riparian reserves to provide opportunity for comment during project planning. RIPARIAN RESERVES ARE LAND ALLOCATIONS - NOT MERELY BUFFERS FOR TIMBER MANAGEMENT.

b. The ROD (p. B-24 and C-31) specifically mentions the need to incorporate earthflows and "potentially unstable areas" into riparian reserves. The DEIS failed to explicitly incorporate instability mapping as a factor in determining the extent of riparian reserves. Prior to decisions

24-11

about vegetation treatments and commercial logging, the BLM must map inner gorges, slump/earthflows and other unstable areas and then decide where to incorporate them into riparian reserves as required by the ROD.

The DEIS (p.3-4) states that soils are "moderately erosive and prone to rotational and transnational slides. Many of the smaller basins exhibit multiple erosion channels, particularly areas prone to rotational slumping" and "in areas of contact between serpentine and other geologic types in the Rogue Formation, there is high risk of slope failure." Proposed riparian widths based on tree heights (DEIS 2-8) are clearly inadequate because they do not incorporate existing slumps, landslides, and potentially unstable areas. The DEIS (A-69) states that harvest units were "inspected for indications of current and potential slope instability; problem area were eliminated from further consideration or buffered where appropriate" and the DEIS (p 4-23) erroneously states that Matrix lands include "lands that may have slope instability as a result of their steepness." If lands within the planning area are rejected for inclusion as timber sale units or treatment because of instability then it follows that these lands must be identified as riparian reserves during decision making. The ROD on p. C-30 states that for seasonally flowing or intermittent streams: "[a]t a minimum, the riparian reserves must include: The extent of unstable and potentially unstable areas (including earthflows), The stream channel and the area extending to the top of the inner gorge" (emphasis added). (Note the distinction between administratively designated unsuitable lands and ROD "unstable" lands. It is not necessary to demonstrate that lands are unsuitable for them to be judged unstable and included as part of a riparian reserve.) Headwalls which occur at the headword tip of class 4 channels, unchanneled valleys (swales) above class 4 channels, slump/earthflows, and steep slopes adjacent to stream channels (e.g. inner gorges) may be judged unstable or potentially unstable. Mitigating measures (such as not crossing headwalls with roads or not including these areas in timber sale units) does not exempt the BLM from meeting the ROD requirement for including headwalls and other unstable areas within riparian reserves.

The DEIS describes high erosion risk lands in the planning area but they have not been mapped. Soils mapping alone (DEIS 3-4) does not integrate geomorphic features such as slump-earthflow terrain or geologic hazards such as inner gorges. In addition the DEIS fails to quantify the acres of land proposed for logging that are on severe or high erosion risk lands. Prior to decisions about logging, the BLM must develop erosion risk maps based on geology, landforms, and effects of past land use. For example, prior to identifying timber sale units the Happy Camp District (Klamath National Forest) developed a map of high erosion risk lands and eliminated them from the Jefferson Timber Sale. Once an erosion risk map has been developed the BLM can properly identify riparian reserves, reduce erosion risk by reducing activity on high erosion risk lands, and disclose the acres of high erosion risk lands that will be logged or roaded (including existing roads and haul roads outside the planning area).

c. Swales and unchanneled valleys are found immediately upstream and adjacent to class 4 (first order) channels. These areas experience overland flow during winter months and are susceptible to surface erosion, slumping, and gullyng. The DEIS should include sensitive unchanneled valleys and swales as riparian reserves. Logging and roadbuilding in these areas is likely to result in erosion and destruction of hyporheic areas.

d. The proposed commercial logging and vegetative treatments do not currently demonstrate compliance with the **Aquatic Conservation Strategy** at appropriate stream and watershed scales as required by Judge Rothstein decision (PCFFA IID). For example, assessing impacts at the 5th field watershed scale (the entire planning area) is inappropriate for determining impacts to coho salmon in the Whisky Creek and Kelsey Creek watersheds.

The ROD states on p. B-10 that "management actions that do not maintain the existing condition (i.e. high canopy closure in mature stands) or lead to improved conditions in the long term would not "meet" the intent of the Aquatic Conservation Strategy and thus, should not be implemented." Reductions of canopy cover in old growth stands (alternative 1) will not lead to "improved [aquatic] conditions" and are not consistent with the ACS.

e. The high densities of the existing road system in portions of the planning area are jeopardizing existence of salmonids. The current proposal of decommissioning 4-6 percent (10-14 miles) of the existing 237 road miles is not nearly enough to prevent fish killing erosion during the next large flood (such as January 1, 1997). Impacts from roads must be analyzed cumulatively in time and space. Even though the BLM proposes few or no new roads, the impact of existing roads during the next big flood would not meet ACS objectives, especially in the upper Mule Creek watershed. The road density criteria must be reduced to some acceptable standard for each Rogue River tributary that supports coho salmon (Table 3-4) before new commercial logging or new roads are constructed. More importantly, road segments on unstable lands (currently unidentified as riparian reserves) or roads within one tree height of stream channels (DEIS 3-33, Table 3-1) must be eliminated or engineered to withstand rain-on-snow flood events.

Before claiming benefits from road removal that are consistent with the ACS, the BLM must first demonstrate that the roads with the greatest threat for fish in the planning area are indeed being removed or repaired. It appears that the driver for road decommissioning, repair, or gating is not the imminent risk to fish survival but that the road is not currently needed by the timber program. Until such time that the BLM develops a timetable and a budget for coordinated activities that will ensure the viability of salmonids in the Kelsey Whisky Planning Area (substantial road removal/closures, habitat improvement, habitat and population monitoring), no commercial timber sales should go forward.

f. Riparian reserves cannot fully protect streams from mass erosion involving large amounts of sediment delivered to the stream channel via debris flows or slumps (DEIS p. A-69). Inadequate identification of riparian reserves on potentially unstable areas prevents attainment of aquatic conservation objective 5.

g. The DEIS does not discuss the trade off between fire hazard reduction and potential for increased soil erosion that would affect streams and channels within riparian reserves. Similarly the increased tree growth in riparian reserves from thinning has a trade-off of increased soil erosion. A specific concern is the inadequacy of 25 ft buffers to prevent accelerated soil erosion when vegetation is removed from steep slopes adjacent to a stream channel. A 25 ft buffer may be adequate for flat ground but many treatments will be on slopes exceeding 30 percent and some will exceed 70 percent slope. A 25 ft buffer would allow vegetation removal on actively eroding hillslopes next to a stream where every plant root is needed. Hillslopes greater than 30 percent should have a 100 ft

buffer adjacent to the stream channel. Most studies show that a 100 ft buffer is needed to attain measurable erosion reduction.

h. The DEIS does not provide quantitative estimates of the percent of soil that would be damaged in riparian reserves due to hand piling and burning. Depending on the diameter of burn piles the amount could be excessive and fail to meet Aquatic Conservation Objectives. A diameter standard should be established for burn piles and all piles should be at least 50 ft from stream channels. Perhaps lop and scatter would be more consistent with ACS objectives than hand piling and burning.

i. Sediment impacts to coho salmon and other aquatic animals were not analyzed and not disclosed. Increased risk of erosion from logging on steep lands were not analyzed or disclosed. Proposed regeneration logging and road building do not meet ACS objective 5 (DEIS p.A-69). Impacts to fish not compared for the range of alternatives: alternative 1 has greater impacts than alternative 4.

The DEIS analyzed impacts to coho salmon at the 5th field (planning area) scale (DEIS 4-22). When analyzed from the perspective of impacting 5th field watersheds, no individual BLM timber sale is likely to have observable cumulative effects. When impact analysis at the 5th field scale results in no observable impact, smaller spatial scales must be used. Since vegetation removal proposals and road systems are concentrated in the upper portions of 6th and 7th field watersheds where coho salmon spawn, impacts should also be assessed at these watershed scales. Impacts to each coho population in Table 3-4 (DEIS p.3-4) should be assessed to be consistent with Judge Rothstein's decision of Pacific Coast Fishermen's Association lawsuit. A particular concern is the existing road system and high density of roads likely to spew fish killing sediment into streams during the next rain-on-snow event. Vulnerability to rain-on-snow events in each coho salmon tributary should be calculated (DEIS p. 4-4).

The cumulative effects of road building and logging are not adequately disclosed because the baseline for impact comparison (no action alternative) has already been impacted by decades of logging and roadbuilding (DEIS p. 4-31). Previous logging and road building are not tabulated in Tables 2-1 (DEIS p. 2-20-21). The fisheries analysis inappropriately dismisses the cumulative impact of decades of previous logging by using the no action alternative as baseline. Cumulative impacts of logging at scales larger than individual management units should include the past and expected impacts from previous logging. In other words the BLM cannot erase the impacts of previous logging by continually assessing the incremental impact of new logging without acknowledging the context for this new logging: an already heavily impacted landscape (upper Kelsey Creek DEIS p. 4-31).

Proposed logging does not comply with the ESA because the DEIS does not identify a valid Biological Opinion from the National Marine Fisheries Service for threatened coho salmon. Judge Rothstein (PCFFA III) has found previous biological opinions for BLM timber sales to be invalid because they do not comply with the Aquatic Conservation Strategy. The DEIS (p.4.22) erroneously states that the proposed action meets terms and conditions of the NFS LRM/RMP Biological Opinion of March 18,1997.

24-14

The BLM has failed to analyze and quantify site specific accelerated soil erosion from project proposals such as regeneration logging and road building. Instead of doing the NEPA, RMP and ESA required project level, site specific analysis, the DEIS (p. 4.3) inappropriately references a programmatic EIS (the Medford District 1994 RMP). The 1994 RMP/EIS did not disclose site specific erosion and sedimentation impacts and specifically stated that such impacts would be assessed at the project level.

The DEIS provides no analysis or documents to support the statement that "all harvest units would be on stable ground as well as proposed road locations" (DEIS p. 4-4). Natural erosion risk and risk of sediment reaching stream channels would be greatly increased on 628 acres of steep lands proposed for regeneration (clearcut) logging (DEIS p. 2-11). For example, units 1-2, 6-5, 27-4, 27-3 are on 50-80 percent slopes within a few hundred feet of perennial or fish bearing streams. The DEIS (A-69) erroneously states that "[N]ew permanent and temporary roads would not contribute sediment to streams because they would be built on ridges and on other stable terrain away from streams." Mid-slope road 32-9-13 (Maps 2 and 4) would be extended 0.3 miles on a 40 percent slope and would cross one stream channel. The new portion of the road is about 900 ft from Kelsey Creek. Mid-slope road 32-9-13 crosses numerous drainages and has a high risk of causing mass erosion into Kelsey Creek. Road 32-9-13 demonstrates the inherent conflict between maximizing timber extraction (alternatives 1 and 2) and protection of fish habitat from increased sediment as required in ACS objective 5. Extending this mid-slope road does not comply with ACS objective 5. Decommissioning the entire road would comply with the ACS, but only 0.6 miles of this road is proposed for decommissioning in alternatives 1 and 2 (DEIS p A-27).

The DEIS provides no analysis or supporting documentation that unmapped riparian reserves will prevent sediment from reaching streams (DEIS p A-69). Riparian reserves may reduce the impacts of accelerated erosion but will not stop all sediment. Similarly, repeated statements of actions that "minimize" sediment delivery to streams will not stop all erosion and sedimentation from project proposals. The DEIS must analyze and truthfully quantify what the sediment impacts are likely to be, especially during a large flood event that is certain to occur in the long-term. Certainly there is less sediment risk to fish from alternative 4 than alternative 1, but this is not stated or demonstrated to the decisionmaker. The decisionmaker is currently being misled into believing that impacts to fish and aquatic creatures and the habitat that supports them are the same for all alternatives. This is contrary to the intent of NEPA.

The DEIS has detailed analysis of the proposed projects impacts from future wildfires. For example a fuel model was developed (Appendix 9). But the DEIS didn't correspondingly analyze the impacts associated with floods and resultant erosion. The DEIS did not develop a sediment model or assess increased erosion risk from proposed projects, especially regeneration logging and road construction. The BLM demonstrates a bias in emphasizing analysis that demonstrate positive impacts (fuels and fire) while ignoring analysis and modeling that may show adverse impacts (acres of increased erosion risk, tons of sediment delivered to stream channels). Catastrophic wild fire appears to be a driver for impact analysis (Fire and Fuels DEIS 4-6, Tables 4-1, 4-2). Although floods are certain to occur in the long-term, analysis of effects of catastrophic floods are missing from the analysis.

j. Commercial logging and road building on steep, erosion prone terrain is certain to have adverse sediment impacts and merits a "likely to adversely affect" determination for threatened coho salmon.

k. **Pacific lamprey** (*Lampetra tridentata*) is declining across its range, including the Rogue Basin. The DEIS failed to identify Pacific lamprey as a special status vertebrate (DEIS p. A-43). Pacific lamprey was listed state sensitive in 1993 (OAR 635-044-0130) and given further legal protected status by the state in 1996 (OAR 635-044-0130). The rare Western brook lamprey (*Lampetra richardsoni*) may also exist in the planning area. Culverts that pass salmonids are often barriers to lamprey because lamprey cannot jump. Culvert replacement may need to consider lamprey passage if lamprey ammocoetes are detected in stream reaches below the culvert.

l. **Green sturgeon** has been petitioned for federal listing. Green sturgeon may spawn in the planning area in the mainstem Rogue. Chemical applications and the misuse of fire retardant in the planning area could be detrimental to sturgeon reproduction.

## 2. Survey and Manage Species

Surveys for Special Status and Survey and Manage Species have not been completed (DEIS p.x). Assurances that "all required sites would be protected according to established direction and protocols" are inadequate for impact analysis and decision making. Surveys should be completed for Survey and Manage species and the results should be disclosed in the DEIS, analyzed and mapped. The Public and the Decisionmaker cannot adequately analyze the impacts of alternatives without the incorporation of Survey and Manage Species locations into the DEIS. Species affected include red tree, Del Norte salamander, chace sideband, Oregon shoulderband, bluegrey and Pappiloose tail-droppers, Oregon megomphix, Cyripedium fasciculatum, Bryoria tortosa, Dendrisocaulon intricatum, Platismatialacunose, Pseudocyphellaria rainierensis, Ramalina thrausta, Usnea longissima and Encalypta brevicolla var. crumiana.

A. Red tree Voles - The Siskiyou Project wants to be shown on a map indicating detections of red tree voles, which ones will be protected, and which ones will be logged.

a. Impact analysis of the DEIS is inadequate because a lack of surveys for Special Status and Survey and Manage Species precludes quantitative impact analysis required for decision making. How can site specific impacts to red tree voles be accurately described if no surveys have been completed?

b. The DEIS provides for site specific logging of trees (timber sale units and vegetative treatments in maps 4,5,6) but fails to provide site specific descriptions of how Special Status and Survey And Manage Species will be protected. For example, high densities of red tree voles may make some timber sale units impractical to implement leading to the elimination of prescribed buffers (DEIS 2-7). Recent reviews of BLM timber sales indicates BLM uses considerable discretion in the application of protection buffers for red tree voles. Some vole trees get protected and others do not. The Siskiyou Project and others must be provided timely opportunity to field inspect and comment on the effectiveness of protection measures identified for each timber sale unit well before the decision is signed. Current wording ("Required surveys would be completed for [Special Status and Survey and Manage Species] before a Record of Decision is signed" (p. x) does not provide a review period for the public prior to decision making. This is contrary to the NEPA. A

24-16

supplemental DEIS or some other notification is needed to describe the results of species surveys and explicitly map how protection measures will be implemented for red tree voles in each timber sale unit or vegetative treatment.

B. Del Norte Salamanders - Although Del Norte salamanders are "widely distributed across the watershed" (DEIS 3-13) and clearcutting (regeneration harvest) will cause adverse impacts (Survey and Manage FEIS), **IMPACTS TO DEL NORTE SALAMANDERS HAVE NOT BEEN ASSESSED** (DEIS 4-15). Since no surveys for Del Norte salamanders will be conducted, all habitats must be protected. BLM must identify and manage high-priority sites to provide for a reasonable assurance of species persistence. Until high-priority sites can be determined, manage all known sites (Survey and Manage ROD p. 11).

The Siskiyou Project wants to be provided a map indicating all known Del Norte salamander sites and high priority sites for Del Norte Salamanders (DEIS 3-13 and Survey and Manage ROD p. 11). Although no surveys for the actual animal are required, talus areas occupied by Del Norte salamanders are relatively easy to identify. All talus areas suitable of Del Norte salamanders should be identified and given protection as recommended in the ROD for survey and manage species (p.40). Since talus areas would likely have soil constraints for regeneration harvest, trees on talus sites within regeneration units should be protected.

### 3. Fuels

#### **Logging on certain sites can increase fuel loading of ground and near ground fuels.**

When shaded forest stands are thinned, there is a history of previously suppressed broadleaf species (tanoak and madrone for example) exhibiting greatly increased growth. This causes a corresponding increase in ground and near ground fuels. Risk of catastrophic fire can measurably increase from such thins. Though ladder fuels are reduced, ground fuels from untreated slash and from increased broadleaf growth create conditions that can cause cambium baking. Many stand replacement events are due to cambium baking near ground level rather than crown fire.

This impact is substantiated in the DEIS on page 3-11 which states "Partial cuts in the East Fork Kelsey Creek and Quail Creek areas have substantially increased the brush component, placing these areas at greater risk of stand replacement fire. Past clear cutting in the areas of Mule Creek, East Fork Mule Creek and North Fork Kelsey Creek has created additional risk of stand replacement fires through both brush invasion and new young plantations. This places older forest habitats at a greater risk to stand replacement fire." The quote describes conditions in the project area that were created by past forest management.

Siskiyou Project maintains that the treatments in the Preferred Alternative (commercial thin, overstory removal, commercial density management, regeneration harvest) are not substantially different from those harvest activities (partial cutting, clear cutting) that increased the risk of stand replacement wildfire historically and the Preferred Alternative will similarly increase that risk. This is important because a Purpose and Need (page 1-3) is to "reduce fuel hazard in the planning area to avoid large losses of valuable resources". The logging of units will largely work against this Purpose and Need.

24-17

Similarly, commercial thinning can convert oak/ madrone forests into brushfields. When madrone and oak species are cut, they often send out a flurry of sprouts. In a few seasons a once well formed bole and canopy is replaced with a shrub form of the species. This phenomena is widespread on BLM lands where fuels management is emphasized. The DEIS does not acknowledge that on some sites (e.g. ridges and south slopes where mature hardwoods now dominate the canopy), it may be best to maintain tree sized madrone and oak (>7" DBH) regardless of spacing to avoid converting an oak/madrone forest into a oak/madrone brushfield.

**4. Connectivity, Fragmentation, LSR Habitat, Late-Successional Associated Species, Northern Spotted Owl**

**A) Connectivity, Fragmentation and Late-Successional Habitat**

Years of logging in the Pacific Northwest have caused a decrease of closed canopy, mature and old forests. In addition, the remnant patches of closed canopy, mature and old forests have, because of this logging, been isolated. These two factors have created a crisis in our Northwest Forests that has led to the population decline and Endangered and Threatened status of species. Though fire suppression is an important impact that has gone hand-in-hand with the logging, liquidation of our older forests is a primary concern that should be addressed. A primary focus of any Purpose and Need that relates to forest health and late successional enhancement should be the retention of closed-canopy forests and of the mature and older trees in these forests. Older, fire resistant trees should be left standing.

The Preferred Alternative would reduce connectivity, produce additional fragmentation and degrade habitat for late successional associated species thus increasing the risk of population declines. The degradation would occur in the project area but would have adverse ramifications outside of this area.

The Upper East Kelsey Watershed would, under the Preferred Alternative, receive 217 acres of regeneration logging (about 6% of the subwatershed and 7% of the late successional forest). Similarly, The Meadow Creek Watershed would receive 128 acres of regeneration logging (about 5% of the subwatershed). These are both currently pristine watersheds that supply excellent connective and late successional habitat and will be significantly degraded.

The way the impacts are described (page 4-9) repeats the classic mistake of scale whereby impacts are dismissed because they are considered "relatively" minor at a certain scale but cumulate to impacts of landscape proportion as the localized populations decline and extirpations multiply. This is exactly what has created the crisis of habitat degradation and fragmentation that now exists. To describe the effects of regeneration logging of hundreds of acres of closed canopy forest in a critical connectivity area as "negligible" (page 4-8) is misguided and may indicate some fundamental misunderstandings of ecological principals. Similarly, to defer harvest in heavily impacted areas and begin that same degradation process in nearby, relatively pristine watersheds (page 4-16) and then to claim only "a minor addition to the impacts on late-successional habitat." shows a disregard and/ or misunderstanding of both fragmentation and cumulative effects. The three paragraph discussion of cumulative effects on late-successional habitat (4-16) is inadequate. Real analysis of this very important issue is required and without meaningful analysis, neither the Public nor the Decisionmaker is able to understand the impacts of the Preferred Alternative.

24-18

The DEIS (page 4-9) points out that "the effect of regeneration harvest in Alternatives 1 and 2 in the Upper East Kelsey and Meadow Creek subwatersheds would be great enough that there may be some reduction of habitat use and impedance of movement by late-successional affiliated wildlife. The effects of these proposed regeneration harvest units on currently closed-canopy north-facing slopes would be greater than in other areas because of their strategic location in relation to this LSR further highlighted by the Southwest LSRA (USDA/USDI) which emphasizes the importance of an east-west older forest link. This connection would be affected by these proposed activities, as well because these two watersheds have previously had little or no timber harvest." Regarding the degradation of late-successional habitat, the DEIS reveals that "There would still be substantial direct adverse effects to late-successional habitat from regeneration harvest in East Fork Kelsey and Meadow Creek sub-watersheds." (page 4-16)

The DEIS describes the Upper Kelsey watershed as "an area expected to provide habitat connectivity. Consequently, habitat removal of 217 acres would not be consistent with the intent of this alternative, although scale is important to factor in." (page 4-9) Why is this logging a part of Alternative 2, the Preferred Alternative, if it is not consistent with the intent of this alternative regarding connectivity goals?

In all alternatives, non-regeneration cuts such as commercial thins may also decrease connectivity and habitat for closed-canopy associated species. The affect of reduction of crown closure varies from species to species with some species (such as Del Norte salamander) particularly sensitive and vulnerable. Marking and logging with the intention of retaining a certain percent crown closure is an imperfect science and the effects of blowdown and prescribed fire can further "open up" stands. The potential for commercial thin units, commercial density management units and overstory removal units (as well as regeneration harvest units) to cause closed-canopy habitat degradation, fragmentation and loss of connectivity was not adequately described or analyzed in the DEIS.

Due to the habitat degradation described above, species associated with and dependent on closed-canopy and mature and older forests will suffer from the logging activities bundled in the Preferred Alternative. Please refer to Section 3 (Survey and Mange) for a listing of some of those species. Other species that will be compromised include fisher, pine marten, white-footed vole, bald eagle, northern goshawk and *Bensoniella oregana*. Many other plant, fungi and invertebrate animal species will also be impacted.

Please remember that the Northwest Forest Plan was designed as a Minimum needed to retain viability of Northern spotted owl and other late-successional associated species and thus as a Minimum needed to retain a functioning late-successional ecosystem over the range of the Northern spotted owl. Meeting minimum requirements is far different from maintaining and providing optimum (or even "average") habitat.

#### B) Northern Spotted Owl

Presently, there are 28 Northern spotted owl "core areas" in the Project Area and with 13 (46%) of the areas failing to meet even the minimum viability requirements. This constitutes a spotted owl crisis for the planning area. With 46% of the spotted owl pairs in a "non-viable" habitat situation, the response should NOT be to decrease the habitat in the Project Area's stronghold of Northern

Spotted Owls even if the BLM believes these core areas would retain habitat meeting its minimum viability requirements. The Preferred Alternative would "remove or degrade a total of 370 acres of currently suitable northern spotted owl habitat". (pg. 4-18) This does not include the significant habitat loss and disturbance impacts associated with the partial cut treatments that are a part of the alternative. The KCNA and Kelsey's Demise (a strange, sad name for a spotted owl area) spotted owl pairs will be especially hard hit.

Critical Habitat Areas are designated under the Endangered Species Act. The Preferred Alternative would degrade or remove 1,259 acres of suitable owl habitat most all of which is in CHU-65. Connectivity is a major problem when addressing the challenge of Northern spotted owl viability. This CHU is designed to maintain a link through the Klamath Province between the Cascade and Coast Range Provinces (p.4-20) This linkage should be maintained rather than degraded if we, the Public, are serious about saving the Northern spotted owl from extinction.

At several places (pg. 4-18, 4-20), the DEIS maintains that there will be a benefit to late-successional habitat and thus to spotted owls as the management activities will reduce the risk of catastrophic fire that can eliminate and degrade owl habitat. As explained in this review under "3.Fuels", Siskiyou Project maintains that the management activities of the Preferred Alternative will substantially increase the risk of stand replacement fire by opening up stands and increasing ground fuels as broadleaf understory grows and by creating plantations that aide in the spread of wildfire.

Due to the serious nature of impacts to Northern spotted owl, the consultation process with the U.S. Fish & Wildlife Service should result in a finding of "likely to adversely affect XXXXX"

Any impacts that affect Northern spotted owls will "trickle down" to other parts and other species in the late-successional ecosystem. The spotted owl can imperfectly serve as an indicator of Pacific northwest late-successional ecosystems.

#### C) Marbled Murrelet

Marbled Murrelet habitat is found in the Project Area. US Fish & Wildlife Service designated CHU #OR-07-F is also in the Project Area. The purpose of the Critical Habitat Unit is to provide habitat for this ESA Threatened species. No murrelets have been observed in the Project Area and the area is further from the Ocean (greater than 12 miles) (pg. 3-15). The Project Area is approximately 28 miles from the Coast. Siskiyou Project wants to point out 3 facts: 1) Murrelets have breed upwards of 35 miles from the Coast, 2) In the nearby South Fork Coquille Drainage/ Siskiyou National Forest (Hall Ridge), murrelet "occupied behavior" has been documented about 25 miles from the Coast and 3) In the nearby Elk River drainage/ Siskiyou National Forest (Blackberry and Panther Creeks) protocol compliant surveys repeatedly reported absence of murrelets but surveys conducted in the less accessible streambottoms actually found occupied behavior and a nest site.

The analysis of the Preferred Alternative on Marbled Murrelet habitat and on the CHU was insufficient.

#### 5. Forestry Related issues

A) Blowdown - The DEIS does not disclose the increased risk of blowdown inherent with thinning and regeneration logging. The BLM must address the following questions with respect to blowdown:

- a. Is blowdown anticipated and desired, inside and outside timber sale units?
- b. Were the effects of blowdown on adjacent forest stands considered?
- c. Are there expected to be any adverse environmental effects resulting from blowdown?
- d. How will blowdown be treated? Will blowdown generate another entry with resultant soil and water impacts?

B. Sugar pine treatments – Siskiyou Project supports thinning around old sugar pines. However, the treatments should be confined to the (approximately) the dripline of the crown of the sugar pine tree.

C. Soil impacts – Soil impacts from logging including and compaction and erosion were not adequately described and adverse impacts from erosion and compaction of soils were not adequately analyzed in the Environmental Consequences section (pgs. 4-3&4).

D. Cumulative effects of decades of logging not illustrated - A map of existing seral stages within the project area is needed. The DEIS is inadequate because it does not show the location of previous logging units and dates they were logged in the watershed nor does it show logging units for recent or future sales (Mule timber sale). The maps for various Alternatives give a perception that there has been no previous logging in the planning area.

F. Number and size of trees proposed for logging not disclosed - At a minimum, the DEIS should disclose the estimated or actual number of large trees to be logged in each unit (mature trees 21-31 inches; old growth trees greater than 32 inches diameter breast high). Impact analysis in the environmental assessment is inadequate if decisions about the size and number of trees to be logged are not evident to the public and decisionmaker at the time the FEIS is released. Delaying determinations of the size and number of trees to be logged until after environmental analysis is written and after a decision has been made is inconsistent with the need for full disclosure of impacts before decisions are made (National Environmental Policy Act). The Siskiyou Project and its members will be harmed if the BLM does not fully disclose the size and number of trees proposed for logging in the Kelsey Whisky planning area before a decision is made.

Describing impacts in terms of board feet may be helpful to a prospective purchaser but is inadequate in determining ecological and visual impacts. Descriptions of proposed logging in terms of tree retention may be helpful in determining compliance with the Northwest Forest Plan Standards & Guidelines but such descriptions do not describe the effects of proposed logging in terms of tree removal.

G. Irreversible and Irretrievable Commitment of Resources not disclosed: loss of large diameter trees - If logging includes the removal of a significant number of old growth trees (trees over 32 inches), this would represent an irreversible or irretrievable commitment of resources. The DEIS must be amended to report how many trees over 32 inches DBH will be logged and removed with various alternatives. How does the number of trees over 32 inches DBH to be logged vary across

24-21

alternatives and timber sale units? The public and decisionmakers need to be provided quantitative information about the number of large trees that will be logged. The general, non-specific reference to an Irreversible and Irretrievable Commitment of Resources (p. 4-31) regarding late-successional habitat is not sufficient.

**6. Port Orford Cedar and Noxious Weeds**

A) Port Orford Cedar – The DEIS reports a population of POC in the Planning Area but little information and no map are provided. (p. 3-8). The population is in upper Mule Creek, root disease infection is present and a population in the “southeast corner of the planning area are thought to be free of root disease”. (p.3-8) Is the disease free population impacted in any way by management proposals? Do any of the proposed activities involve the infected POC area and increase risk of disease spread? No mention in Chapter 4 – Environmental Consequences dealt with consequences relating to POC. The description and analysis of POC concerns is inadequate.

Are the POC populations in the Project Area near the northeast extent of the range of POC? Populations near the edge of distribution can be particularly important regarding genetic adaptations, range expansion and other factors.

B) Noxious Weeds – The Preferred Alternative, through regen harvest, temporary road construction and road reconstruction will create conditions conducive to the spread of noxious weeds already found in the Project Area and increase the risk of contamination of new invasive species. The fact that some disturbed areas will eventually “close in” and native vegetation will out-compete native species (pg. 4-31) is only partly true and is in contradiction to most Federal Agency policy which understands the danger in spreading weeds, creating a larger “bank” of seed and plants which can take advantage of open landscapes (such as roadsides) and other disturbed areas (harvest units and burned areas). As such, the Environmental Consequences are glossed over and not adequately conveyed. This is a serious problem regionally, locally and in the planning area. It is disappointing that specific control measures are not identified in the DEIS and that there are no specific projects in the Preferred Alternative that treat populations in the Project Area.

**7. Recreation and Economics**

The Wild & Scenic Rogue River is a nationally (even globally) famous destination used by local citizens as well as tourists. It is a mecca for white-water enthusiasts, fishermen, hunters and hikers. The River classification through the Planning Area is “Wild” and the Rogue River Trail passes through the Planning Area. Recreationists value the pristine and natural parts of the landscape as opposed to its logging units. Private land owners in the Planning Area value the natural conditions also and some plan to use their property in a economical - recreational manner.

Though the Preferred Alternative is designed to “hide” its visual impacts from the area’s users, there will be substantial impacts and degradation of the recreational resource. In several places, management activities (including Commercial Density Management logging) would take place less than one mile from the Rogue River. Helicopter logging, chainsaw use, tractor logging, log truck traffic and other impacts will create noise, dust and possible visual impacts.

24-22

The DEIS doesn't reveal the impacts of the Preferred Alternative (or other alternatives) on this critical, multimillion dollar resource. The Reviewing Public and the Decisionmaker is not educated as to the impacts. For example, the reviewers could find no mention of noise in the DEIS. Noise levels from logging can clearly impact the recreational experience. It is also unclear how the Preferred Alternative effects the visual resource. That we are told: "implementation of project design features that do not attract the attention of the casual observer viewing from key observation points" are allowed is not good enough. More detail is required.

The effect on the recreational also effects the economy. The 1998 figure that the Wild & Scenic Rogue generates is 13 million dollars per year. The infrastructure of this economy is the natural values of the Rogue River; it's wildlife, fish, water quality and forests. The Preferred Alternative will degrade this infrastructure.

## **8. Roadless Area not Adequately Revealed or Described**

The Roadless Area issue is a national one. One U.S. Forest Service lands nationwide during the Clinton Administration, a rule to protect the Forest Service Roadless Areas produced record breaking support from hundreds of thousands of citizens. The issue was raised in scoping and described briefly (without even the mention of "roadless area") on page 1-7 under "Other Issues". Two paragraphs on page 4-26 minimize the effects of all alternatives on "undeveloped areas".

The reality is that the Planning Area includes development what may be the largest (46,646 acres) undeveloped forested BLM area in the contiguous United States. The area has for years been named the Zane Grey Roadless Area. It is a part of a current proposal of the Oregon Wilderness Coalition (OWC) to legislate Wilderness in the state.

When an overlay (developed by OWC) of the Roadless Area is placed over the projects in the Preferred Alternative, it is evident that they do impact and decrease the acreage of the Zane Grey Roadless Area and are not "minor".

Moreover, the DEIS did not adequate describe and analyze impacts regarding the Roadless Issue. No map of the huge Zane Grey roadless area was produced by BLM. The U. S. Forest Service has been mapping and analyzing roadless areas since the early 1970s in response to public interest and biological and social effects. The cursory treatment "danced around" this important issue rather than confront it.

## **9. ACEC and RNA**

The DEIS proposes an ACEC with a nested RNA in the East Fork Whiskey Creek. The ACEC conserves several plant community types including the "largest known block of relatively unentered forest representing the Douglas fir/ tanoak series in the Medford District". (pg. 3-6) Two scenarios for ACEC designation (Preferred Alternative-1,676 acres and Alternative 4 - 2,843 acres). The larger ACEC is clearly preferable from a research and biological view. The larger area will be more likely to retain the ecological characteristics (more defensible from disturbance events,

24-23

less effected by management activities outside the ACEC, etc.) and bascline conditions which speak to the purposes of RNAs and ACECs.

**10. Global climate change**

In light of near scientific certainty from the latest team of UN scientists that humans are causing global warming and the fact that the US government is advocating credits for carbon sequestration in forests the BLM needs to disclose the adverse effects of carbon emissions from burning and removal of mature trees. How much carbon do the various alternatives put into the atmosphere and what does it do (cumulative impact). "New information" as defined by the NEPA suggests that alternatives in EAs and EISs recognize a carbon sequestration alternative that would retain healthy trees and reduce or eliminate burning.

Sincerely,

/s/

Lori Cooper  
staff attorney

/s/

Richard K. Nawa  
staff ecologist

c: Klamath Siskiyou Wildlands, Headwaters

25

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

- \* the Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!
- \* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!
- \* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres
- \* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,  
Neil Seigel  
4225 NE Ainsworth  
Portland OR 97218

July 12, 2002

26

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

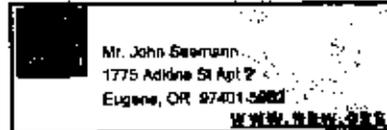
- \* the Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging! We should not compromise any roadless areas. Our state forests are littered with roads all ready. No new roads should be constructed, especially in unspoiled, intact areas such as the Zane Grey Roadless Area.
- \* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!
- \* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres
- \* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging! I am a native Oregonian. I call on you to protect this wild heritage that is an intrinsic part of my culture. There is no higher use for old growth forest than to preserve it.

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,

David Muddryla  
6309 NE Broadway St  
Portland OR, 97213

Dear Team Leader Tubman:



As you know, the Zane Grey  
Roadless Area is the largest  
such area in the U.S.

7/12/02

Please preserve this land and the remarkable  
26 mile stretch of the Rogue River by designating  
it a wilderness and opposing the Kelsey Wiskey  
timber sale and road construction.

Respectfully yours,

CC: Hon. Peter DeFazio, M.C.

27

BLM  
Medford District Office  
3040 Biddle Rd.  
Medford, OR 97504  
Attn: Lynda Brody

Machajski  
275 Fenic Dr.  
Ashland, OR.  
97520.  
July 11, 2002.

Dear BLM,

(28-1)

Please include this letter concerning the  
Zane Grey wild roadless area, postmarked 7-12-02

The unique habitat of this area, especially the  
East fork of Whiskey Creek should be left alone -  
no new roads & no logging. Leave the old  
trees alone - NO regeneration cutting which  
actually increases fire hazards. Decommissioning of  
roads proposed in the DEIS is the way  
to go, with increases in decommissioning to  
protect critical Northern spotted owl habitat.

The ACEC should include all of the 2,844  
acres of the East Fork Whiskey Creek area.

I feel strongly, very strongly about this.

Clearcutting is not the <sup>(28-2)</sup> answer, not <sup>HEAL</sup> natural and has been shown scientifically to lead to destruction not improvement of our land. For example, the latest research shows old growth experiences low intensity burns, while younger tree "plantations" with roads burn hot & fast.

Don't cut down all the trees and put them in a tree museum\*. Leave the Zane Grey roadless area & the Kelsey-Whiskey timber sale area ALONE.

Save our wildlife, our trees, our fish, our birds, our water, our air, our souls.

\* from Joni Mitchell's song "Woodstock"

Thank you for listening.

Karen L Machunski (Katja)  
Resident since 1976 Jackson County.



3529 S. E. Rex St.  
Portland OR 97202  
July 9, 2002

30

Bureau of land management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
Attn: Lynda Boody  
re: Kelsey Whiskey Landscape Management Plan  
and Assorted Resource Management Plan Amendments  
and Draft Environmental Impact Statement

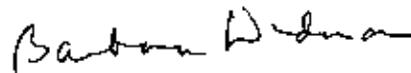
Dear Madam,

I think I understand the Purpose and Need for the Kelsey Whiskey Landscape Management Plan.

I think that Alternative 4 meets the objectives better than the preferred Alternative 2. In particular, Alternative 4 provides the best balance between current desires for timber and future benefits to the land and its inhabitants and visitors.

Establishment of the East Whiskey Creek ACEC is a fine idea, but it should be as large as proposed in Alternative 4, and it should be treated most gently: no logging in spotted owl habitat, and no logging of big trees. Because the Zane Grey Roadless Area has high wilderness potential, it should be left roadless and unlogged.

Sincerely,



Barbara Dudman

TUES 7/19/02

(31-1)

Lyndia Boody - I'm writing from Humboldt Co - part of this Biological Region called the state of Jefferson. I'm opposed to the proposed Kelsey-Whisky timber sale in the Glendale Resource Area of the Medford BLM. I'm opposed to logging within the Zane Bueg Roadless Area & in adjacent old growth & mature forest areas along the Rogue River. I'm a former Oregonian & have lived in Humboldt Co near 30 years. I'm opposed to the DEIS which calls for clear-cutting 355 acres of old forests in the total of 1,324 acres, & constructing 1.9 miles of logging roads in this forest. I don't believe that logging the forest to save it from fire is good fire science (I'm worked TSE & cruise timber & been to USFS fire school in Washington) but an excuse to expand logging in the area. The proposed logging would degrade 1259 acres of northern spotted owl habitat & degrade salmon habitat watershed. I encourage the BLM to designate the largest proposed Area of Critical Enviro. Concern (ACEC), 2844 acres, to the East Fork Whisky Creek watershed. I also support →

31-2  
The 10.4 miles of Road deCommission  
Proposed in The DEIS. Preferred alternative.  
Thank you FOR allowing me  
This citizen input —

Richard Campos  
2121 Blake Rd  
McKinleyville, Calif.  
95519  
(707) 839-8840

8 July 02

To: Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

(32)

Dear BLM,

I am writing to encourage the preservation of the Zone Grey roadless area that is adjacent to the Wild Rogue Wilderness. The proposed logging of 355 acres of old forest within this pristine area should not be undertaken. Scientific evidence certainly supports the fact that maintaining roadless areas and old trees results in low intensity fires when compared to fires that start among young planted trees.

This area within the Kelsey-Whiskey timber sale contains over one thousand acres of critical habitat for the Northern spotted owl which will be degraded according to the details within the DEIS. The Area of Critical Environmental Concern should preserve the full 2,844 acres of the East Fork Whiskey Creek watershed.

Thank you for your attention to this important conservation of a unique area. Remember "conservative" is related to conservation.

Sincerely

Clare E. Chase M.D., ; Astoria OR

July 8th, 2002

Bruce Campbell  
614 Gretna Green Way  
Los Angeles, CA 90049

Sherwood Tubman, Team Leader  
Bureau of Land Management  
3040 Biddle Rd.  
Medford, OR 97504

Re: Kelsey Whisky RMPA / LMPA Draft EIS

73-1

Dear Mr. Tubman and your team:

I find it very difficult to choose my preferred alternative from options set forth in the DEIS since I like elements of both Alternatives 3 and 4. Unless Alternative 4 is modified to allow strict oversight by environmental groups in southern Oregon of timber harvest and fuels reduction activities, then I support the No-Action Alternative which is #3, at least temporarily.

While it makes some sense that a sizable (2,843 acres at minimum) Area of Critical Environmental Concern should proceed in the East Fork Whisky Creek watershed (as suggested in Alternative #4) to protect the Tanoak / Douglas-fir / Salal / Evergreen Huckleberry botanical grouping, management of this ACEC must not include timber-cutting since BLM and the Forest Service have proven that fuels reduction and forest health-claimed management generally do more damage than good and is designed to assist timber interests. Also, it would be good to accelerate road decommissioning and to do some thinning in cutover and plantation areas. However since it is likely that large trees will be removed for profit rather than focus on the smaller more flammable trees, such an effort should be delayed until BLM can prove itself trustworthy to proceed. Thus I choose either Alternative 4 with strict oversight by southern Oregon environmental groups, or else Alternative 3 at least temporarily until BLM can prove that it can actually do so-called "forest health" or "fuels reduction" work without messing with the larger trees which actually makes worse the very problems which they claim to be addressing.

The entire Zane Grey roadless area (the largest forested BLM parcel in the country) must be declared wilderness, plus have other protection until it is so designated. The only activity that should be allowed in the Zane Grey roadless area is possible non-herbicide removal of invasive plants in the first perhaps 500 feet from the boundary of the roadless area. No sort of road activity (except possibly taking out / decommissioning roads on the roadless area boundaries) must be allowed anywhere near this treasure for the Rogue River watershed, its native fish species, and the world.

A quote in the DEIS says, "The purpose of the actions related to thinning includes increasing the diameter growth of residual trees." Do trees with sizable diameter already get a priority here (or any consideration at all)? I ask this question first because I've often heard "residual" as a term for the old trees left after some logging in ancient forests. Is it possible that the term residual is being manipulated so that small trees can get more sunlight to help increase their

height / diameter, thus with residual being used in the document as a definition of any tree remaining after timber harvest and/or fuel reduction activities.

A concern is mentioned toward the beginning of the DEIS regarding Late Successional Habitat that species affiliated with late-successional habitat may suffer in the short-term (10 to 20 years) disruption to wildlife movement between Late Successional Reserves. Old-growth forest areas must not be entered for management activities. Late successional is the same as old-growth forest, however some LSRs under the Northwest Forest Plan have cutover areas within them (as well as old-growth areas of course plus other areas). There must be no fuels management or logging in old-growth areas (since such activities increase flammable slash, often takes out water-retaining large trees, and generally dries the soil), while in other areas such management should be very limited and not take medium or large trees in the part of the LSRs which are ancient forest. Also, old trees must not be cut even in the matrix, and especially should be left alone if the area can be a key biological corridor between old-growth / roadless areas.

Under the Analysis and Assumptions portion of the DEIS, it says, "Current trends in management, including land use and fuels development, would continue in compliance with the Medford District RMP and the Northwest Forest Plan." Recall that the Northern Spotted Owl is not maintaining its population which was theorized in the Northwest Forest Plan. There are rumbles in the Bush Administration to dismantle the Northwest Forest Plan -- or at least allow more logging & other damaging management activities even in Late Successional Reserves. Thus, I assume that even if the Northwest Forest Plan is thrown out or dismembered, the aforementioned quote above indicates that Medford BLM promises to abide by rules of the Northwest Forest Plan.

From the quote in the DEIS about what FLPMA directs BLM to do, it is clear that Alternatives 1 and 2 (at least) violate FLPMA in terms of obvious degradation of ecological, environmental air and atmospheric, and water resource values.

Speaking of values, some outstandingly remarkable ecological values of some segments of the Wild & Scenic Rogue River will be adversely impacted by timber management (no matter what linguistic guise is used) which will decrease ongoing water flow, increase siltation/floods/mud, plus damage native fisheries, amphibian, and other crucial habitat.

It is important not to log any large tree that would be possible for a marbled murrelet to nest on, since this is the vital inland range for this species whose numbers have been rapidly deteriorating. And lastly, need I remind you folks that the Klamath / Siskiyou region is known worldwide for its conifer diversity and other plant and animal diversity. The vital Zane Grey roadless area must remain untouched for core habitat and biological corridors for many threatened and endangered species.

Thanks for your attention to these concerns.

Sincerely yours,

*Bruce Campbell*  
Bruce Campbell

July 10, 2002

Bureau of Land Management  
Medford District Office  
3040 Biddle Rd  
Medford OR 97504  
ATTN: Lynda Boody

(34)

To all BLM persons involved with the timber sales in the Zane Grey roadless area and adjacent areas:

I am a concerned citizen and would like to make the following comments.

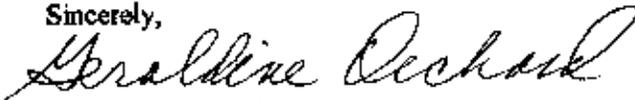
There are precious few roadless and unlogged areas left in this state and they should all be protected, especially in an area as important as the famous Wild and Scenic Rogue River area. This area should be left in its pristine and healthy state, it does not need roads and does not need to be logged. Certainly no logging should be done in any habitat known to support rare and endangered species whether fish, fowl, plant, or otherwise. I believe the "regeneration" of older forests will only increase fire hazards; it has been well proven that the older trees are fire resistant whereas fires burn fiercely in plantations.

The East Fork Whiskey Creek ACEC should not be decreased in size; this is a last opportunity to preserve this unique and beautiful watershed.

The BLM is to be commended for its proposal of decommissioning of 10.4 miles of roads, but I believe that more miles could and should be so treated.

My underlying belief is that the government/BLM should take on a new role which is that of PROTECTOR of the environment rather than an EXTRACTOR, and that logging of old growth and mature forests is not the way to protect them. The private logging companies are doing a fine job of extracting timber. Thank you for the opportunity to comment.

Sincerely,



Geraldine Orchard  
PO Box 1379  
Eagle Point, OR 97524

JONATHAN S. LEVY, M.D.

9 July, 2002

Sherwood Tubman, Team Leader  
BLM  
3040 Biddle Road  
Medford, OR 97504

(35)

Dear Mr. Tubman;

We are writing to comment on the Kelsey Whiskey Timber Sale. It is difficult to believe that the BLM is actually proposing to log an area contiguous to the designated Wild Rogue Wilderness Area as well as intersecting the Zane Grey Roadless Area, the largest forest BLM roadless area in the entire country. We do not need to continue cutting the little remaining old growth that still exists in our forests. What are you thinking? Obviously, only of satisfying timber interests, not preserving our forests for habitat and for future generations to appreciate and enjoy. Our wild lands have suffered to the point that there is so little left it is incomprehensible that you would even consider continuing to cut old growth.

Do not build new roads, not even temporary ones.  
Do not cut mature and old-growth forests.  
Do not cut in the proposed Wilderness boundary.  
Roadless areas and old-growth forests are the most fire resistant. Logging them only increases fire risk.  
Be responsible to the wildlife dependent on the forest and the people who enjoy them.

Sincerely,

Dr. & Mrs. Jonathan S. Levy

29437 GIMPEL HILL RD. EUGENE, OR 97402

(541) 683-3939 CELL (541) 912-8993 EMAIL CLEOTL@AOL.COM

Sheswood Tubman  
Team Leader  
Bureau of Land Management  
3040 Saddle Road  
Medford OR 97504

S.A. Streeter  
27233 E. Elk Park Road  
Welches, Or 97067

9 July 2002

(36)

Dear Sheswood Tubman,

Regarding the Kelsey Whiskey Timber Sale,  
I am concerned about proposed building  
up to 4 miles of a new road, after  
millions of board feet have been logged.  
Any new roads will affect northern spotted  
owls, bald eagles, and Del Norte salamanders,  
which is very sensitive.

Please don't build any new roads.  
Please don't cut mature or old growth trees.  
Please don't cut in the roadless area,  
which is the proposed wilderness boundary.  
Roadless areas and old-growth forests  
are the most fire resistant, and logging  
them simply increases the risk of fire.

Thank you for your consideration in  
this matter.

Sincerely,

Sally Streeter

Frances Petschek  
999 Morton Street  
Ashland OR 97520  
Phone: 541-482-3642

June 27, 2002

Bureau of Land Management  
Medford District Office  
3040 Biddle Rd.  
Medford OR 97504

37

Attn.: Linda Boody

Dear Ms. Boody:

I find it alarming that the BLM proposes to log the Zane Grey Roadless Area and adjacent forests. It is well known that mature, old growth forests withstand fires much easier than new growth areas.

Please reconsider opening this area to roads and logging which often results in land deterioration during the rainy season and hotter fires during a fire. This is an area that should be preserved for wildlife (owls, salmon, etc.) which need undisturbed habitat. Saving the Wild and Scenic Rogue River will ensure that future generations can enjoy this beautiful area as we can now.

Sincerely yours,

*Frances Petschek*

PAUL MOSS  
1849 WHITAKER AVENUE  
WHITE BEAR LAKE, MN 55110

July 9, 2002

Dear Lynda Booder,

(38)

Please consider the following comments:

- ① Please do not allow Roads or Logging in the Paul Gray Roadless Area.
  - ② The BLM should cease logging spotted owl critical habitat.
  - ③ The East Fork Whiskey Creek ACEC should include the full 2,844 acres.
  - ④ The 10.4 miles of road decommissioning proposed in the DELS "preferred alternative" needs to be greatly increased.
- Thank you for your consideration of these comments.

Sincerely,

Paul Moss

(39)

Dear Ms. Boody, (Resource Mgr.)

I live in CA. but over the past twenty years I have frequented So. OR on many occasions... for many reasons. One of the factors that held me in awe on all of my visits was the beauty of the place. The forest... rivers... trails... critters etc...

Sometimes I ran into clear cuts... or other mismanaged areas. It's time to correct the errors we've made in "managing" the "wild"... and then just get out of the way... to focus on... and learn how to stay "OUT OF THE WAY"! The ZANE GREY roadless complex, <sup>+ adjacent old-growth forest areas</sup> appears to me to be/provide a good start (opportunity) to practice just being! with the wild things that are still with us.

cc Congressman Pete De Fazio

Thank you,  
Roger Meehan

R. Meehan  
1135 Masonic Ave. Apt. 1  
San Francisco, CA 94117

BLM  
Medford District Office  
3040 Biddle Rd.  
Medford Oregon 97504  
Attn: Lynda Boody

(40)

Re: Kelsey-Whisky timber sale in Zone Gray roadless Area

Our family co owns property in cone junction of "use" the Zone Gray roadless region (visit by raft/hiking) annually. I am concerned about the proposal to cut in this area:

- the Zone Gray Roadless Area should be left alone: No roads / No Logging
- cease logging (Spotted owl & other critical habitats to these creatures of salmon; more destruction is intolerable.
- "regeneration" cutting of older forest which have been alive surviving (resist that) for thousands of years without such logging practices: NO logging of big, old trees please
- the east fork whisky creek ACEC should include the full 2,844 acres
- the 10.4 miles of road decommissioning proposed in the DEIS "preferred alternative" is a good beginning & should be increased.

Thanks very much for considering this letter, your hard work on our forests is appreciated.

Terry Raymer & family (Terry Raymer)  
2255 W. Cochran Rd  
McKinleyville, CA 95519



Page 2 of 2  
Bureau of Land Management

41-2

The full complement of diversity, including species that are endangered at present, depends upon preservation of undegraded and undiminished habitat. Give East Fork Whiskey Creek the largest amplitude of concern and preservation.

"We are neither so poor that we must give up our natural heritage, nor so rich that we can afford to lose it." NO LOGGING, NO ROADS in wild places.

Thank you for your diligent attention to my concerns.

Yours truly,  
Barbara Deutsch

1919 19th Street  
San Francisco 94107

(415) 641-7538



# SISKIYOU PROJECT

P.O. Box 220 Cave Junction, Oregon 97523 (541) 592-4459, fax: (541) 592-2653

July 12, 2002



42-1

Ron Wenker, District Manager  
Medford District  
USDI Bureau of Land Management  
3040 Biddle Road  
Medford, Oregon 97504

Regarding: Kelsey Whisky Draft EIS

Dear Mr. Wenker:

**Recommendation:** Alternative 4 is clearly the action alternative that best protects the resources of the Planning Area. However, due to reasons explained in the following text, Siskiyou Project recommends selection of the "No-action alternative." We are intrigued by the possibility of an Alternative very similar to Alternative 4 but with modifications such as a 1) the mapping and on-ground delineation of riparian reserves, 2) a diameter limit to prevent the degradation of late-successional habitat and the loss of older, fire resistant trees and 3) sugar pine treatments that are confined to the area within the drip line of the pines. Siskiyou Project would like to engage in a dialogue with the Medford District to explore such possibilities.

The Planning Area contains many land allocations including Matrix lands. The BLM is charged to manage these lands for, among other outputs, timber production. However, the Agency and the Decision-maker have considerable discretion and latitude as to where and when to log on the Matrix lands (timber management is a management that necessarily involves long time periods) and discretion as to the age and size of trees to be logged. After over 50 years of poorly regulated logging of large and old trees, it is prudent to not log these trees, especially since the same 50 years of fire suppression has created an abundance of smaller trees.

## 1. The Preferred Alternative Does Not Meet the Stated Purpose and Need

Two of the stated purposes of the Kelsey Whisky EIS are "to reduce fuel hazard in the planning area to avoid large losses of valuable resources" and to thin Late Successional Reserves "to reduce risk of catastrophic stand replacing wildfire, promote retention, and enhance late-successional forest habitat characteristics." Yet the BLM proposes commercial logging (including regeneration cutting!), the very activity which BLM admits has substantially increased the risk of stand-replacing fire (DEIS, page 3-11), to achieve the purpose and need. This makes no sense.

1 - Siskiyou Project Comments on Kelsey Whisky DEIS

42-2

## 2. Roadless Area not Adequately Revealed or Described

The Kelsey Whisky "planning area" contains the 46,646 acre undeveloped (read: unroaded, non-roaded, roadless), called the "Zane Grey Roadless Area" by thousands of people who value it for its roadless character. The Zane Grey is the largest undeveloped, non-Wilderness forested area on BLM lands and is part of the Oregon Wilderness Coalition (OWC) current proposal to legislate Wilderness in the state.

The protection of Roadless Areas is a national issue. The Clinton Administration's Roadless Area protection rule produced record breaking support from millions of citizens. Incredibly, the BLM devotes only two paragraphs in the entire EIS to the effects of the proposed management actions on "undeveloped areas."

When an overlay (developed by OWC) of the Roadless Area is placed over the projects in the Preferred Alternative, it is evident that they do impact and decrease the acreage of the Zane Grey Roadless Area and are not "minor."

Moreover, the DEIS did not adequately describe and analyze impacts regarding the Roadless Issue. No map of the huge Zane Grey roadless area was produced by BLM. The U. S. Forest Service has been mapping and analyzing roadless areas since the early 1970s in response to public interest and biological and social effects.

There is federal case law which holds that effects of logging and road building in large, unroaded areas are "significant" under NEPA and must be analyzed and disclosed to the public. The Kelsey Whisky DEIS is deficient because it does not disclose and analyze these effects. BLM must produce a supplemental EIS analyzing the effects of the proposed management actions on the Zane Grey roadless area.

## 3. Port Orford Cedar

The DEIS reports a population of Port Orford Cedar (POC) in the Planning Area but little information is included and no map is provided. (p. 3-8). The population in upper Mule Creek is infected with the root disease *P. lateralis* and trees in the "southeast corner of the planning area are thought to be free of root disease". (p.3-8)

The paltry amount of analysis on the risk of the root rot being introduced into the planning area and the effects to the area if it does become infected fall far short of what the Ninth Circuit Court of Appeals deemed necessary in its recent decision, Kern v. BLM.

BLM must prepare a supplemental EIS analyzing the risks and effects of root rot being introduced into the planning area. This analysis should address questions such as whether the disease free population will be impacted in any way by management proposals, whether any of the proposed activities involve the infected POC area and increase risk of disease spread, and whether the POC

42-3

populations in the Project Area are at near the northeast extent of the tree's range (populations near the edge of distribution can be particularly important regarding genetic adaptations, range expansion and other factors).

#### 4. Aquatic Habitat, Fish

a. The proposed decisions (DEIS 1-9) are flawed because they identify lands for commercial logging and vegetation removal (item 4, maps 4,5,6) without first identifying riparian reserves as required in the ROD. Before issuing a decision the BLM must provide the public maps of all stream channels and unstable areas requiring riparian reserves and include a decision in the final EIS designating these mapped areas as riparian reserves. Riparian reserves are not shown on Map 7 as stated on page 3.3. Map 7 only shows some stream channels. The DEIS does not illustrate the extent of riparian reserves to provide opportunity for comment during project planning. **RIPARIAN RESERVES ARE LAND ALLOCATIONS - NOT MERELY BUFFERS FOR TIMBER MANAGEMENT.**

b. The ROD (p. B-24 and C-31) specifically mentions the need to incorporate earthflows and "potentially unstable areas" into riparian reserves. The DEIS failed to explicitly incorporate instability mapping as a factor in determining the extent of riparian reserves. Prior to decisions about vegetation treatments and commercial logging, the BLM must map inner gorges, slump/earthflows and other unstable areas and then decide where to incorporate them into riparian reserves as required by the ROD.

The DEIS (p.3-4) states that soils are "moderately erosive and prone to rotational and translational slides. Many of the smaller basins exhibit multiple erosion channels, particularly areas prone to rotational slumping" and "in areas of contact between serpentine and other geologic types in the Rogue Formation, there is high risk of slope failure." Proposed riparian widths based on tree heights (DEIS 2-8) are clearly inadequate because they do not incorporate existing slumps, landslides, and potentially unstable areas. The DEIS (A-69) states that log units were "inspected for indications of current and potential slope instability; problem area were eliminated from further consideration or buffered where appropriate" and the DEIS (p 4-23) erroneously states that Matrix lands include "lands that may have slope instability as a result of their steepness." If lands within the planning area are rejected for inclusion as timber sale units or treatment because of instability then it follows that these lands must be identified as riparian reserves during decision making. The ROD on p. C-30 states that for seasonally flowing or intermittent streams: "[a]t a minimum, the riparian reserves must include: The extent of unstable and potentially unstable areas (including earthflows), the stream channel and the area extending to the top of the inner gorge" (emphasis added). (Note the distinction between administratively designated unsuitable lands and ROD "unstable" lands. It is not necessary to demonstrate that lands are unsuitable for them to be judged unstable and included as part of a riparian reserve.) Headwalls which occur at the headward tip of class 4 channels, unchanneled valleys (swales) above class 4 channels, slump/earthflows, and steep slopes adjacent to stream channels (e.g. inner gorges) may be judged unstable or potentially unstable. Mitigating measures (such as not crossing headwalls with roads or not including these areas in timber sale units) does not exempt the BLM from meeting the ROD requirement for including headwalls and other unstable

42-4

areas within riparian reserves.

The DEIS describes high erosion risk lands in the planning area but they have not been mapped. Soils mapping alone (DEIS 3-4) does not integrate geomorphic features such as slump-earthflow terrain or geologic hazards such as inner gorges. In addition the DEIS fails to quantify the acres of land proposed for logging that are on severe or high erosion risk lands. Prior to decisions about logging, the BLM must develop erosion risk maps based on geology, landforms, and effects of past land use. For example, prior to identifying timber sale units the Happy Camp District (Klamath National Forest) developed a map of high erosion risk lands and eliminated them from the Jefferson Timber Sale. Once an erosion risk map has been developed the BLM can properly identify riparian reserves, reduce erosion risk by reducing activity on high erosion risk lands, and disclose the acres of high erosion risk lands that will be logged or roaded (including existing roads and haul roads outside the planning area).

c. Swales and unchanneled valleys are found immediately upstream and adjacent to class 4 (first order) channels. These areas experience overland flow during winter months and are susceptible to surface erosion, slumping, and gullying. The DEIS should include sensitive unchanneled valleys and swales as riparian reserves. Logging and roadbuilding in these areas is likely to result in erosion and destruction of hyporheic areas.

d. The proposed commercial logging and vegetative treatments do not currently demonstrate compliance with the Aquatic Conservation Strategy at appropriate stream and watershed scales as required by the Ninth Circuit Court of Appeals' decision in Pacific Coast Federation of Fishermen's Association v. NMFS, 253 F.3d 1137 (9th Cir. 2001) ("PCFFA"). For example, assessing impacts at the 5th field watershed scale (the entire planning area) is inappropriate for determining impacts to coho salmon in the Whisky Creek and Kelsey Creek watersheds.

The ROD states on p. B-10 that "management actions that do not maintain the existing condition (i.e. high canopy closure in mature stands) or lead to improved conditions in the long term would not "meet" the intent of the Aquatic Conservation Strategy and thus, should not be implemented." Reductions of canopy cover in old growth stands (alternative 1) will not lead to "improved [aquatic] conditions" and are not consistent with the ACS.

e. The high densities of the existing road system in portions of the planning area are jeopardizing existence of salmonids. The current proposal of decommissioning 4-6 percent (10-14 miles) of the existing 237 road miles is not nearly enough to prevent fish killing erosion during the next large flood (such as January 1, 1997). Impacts from roads must be analyzed cumulatively in time and space. Even though the BLM proposes few or no new roads, the impact of existing roads during the next big flood would not meet ACS objectives, especially in the upper Mule Creek watershed. The road density criteria must be reduced to some acceptable standard for each Rogue River tributary that supports coho salmon (Table 3-4) before new commercial logging or new roads are constructed. More importantly, road segments on unstable lands (currently unidentified as riparian reserves) or roads within one tree height of stream channels (DEIS 3-33, Table 3-1) must be eliminated or engineered to withstand rain-on-snow flood events.

42-5

Before claiming benefits from road removal that are consistent with the ACS, the BLM must first demonstrate that the roads with the greatest threat for fish in the planning area are indeed being removed or repaired. It appears that the impetus for road decommissioning, repair, or gating is not the imminent risk to fish survival but that the road is not currently needed by the timber program. Until such time that the BLM develops a timetable and a budget for coordinated activities that will ensure the viability of salmonids in the Kelsey Whisky Planning Area (substantial road removal/closures, habitat improvement, habitat and population monitoring), no commercial timber sales should go forward.

f. Riparian reserves cannot fully protect streams from mass erosion involving large amounts of sediment delivered to the stream channel via debris flows or slumps (DEIS p. A-69). Inadequate identification of riparian reserves on potentially unstable areas prevents attainment of aquatic conservation objective 5.

g. The DEIS does not discuss the trade off between fire hazard reduction and potential for increased soil erosion that would affect streams and channels within riparian reserves. Similarly the increased tree growth in riparian reserves from thinning has a trade-off of increased soil erosion. A specific concern is the inadequacy of 25 ft buffers to prevent accelerated soil erosion when vegetation is removed from steep slopes adjacent to a stream channel. A 25 ft buffer may be adequate for flat ground but many treatments will be on slopes exceeding 30 percent and some will exceed 70 percent slope. A 25 ft buffer would allow vegetation removal on actively eroding hillslopes next to a stream where every plant root is needed. Hillslopes greater than 30 percent should have a 100 ft buffer adjacent to the stream channel. Most studies show that a 100 ft buffer is needed to attain measurable erosion reduction.

h. The DEIS does not provide quantitative estimates of the percent of soil that would be damaged in riparian reserves due to hand piling and burning. Depending on the diameter of burn piles the amount could be excessive and fail to meet Aquatic Conservation Objectives. A diameter standard should be established for burn piles and all piles should be at least 50 ft from stream channels. Perhaps top and scatter would be more consistent with ACS objectives than hand piling and burning.

i. Sediment impacts to coho salmon and other aquatic animals were not analyzed and not disclosed. Increased risk of erosion from logging on steep lands were not analyzed or disclosed. Proposed regeneration logging and road building do not meet ACS objective 5 (DEIS p.A-69). Impacts to fish were not compared for the range of alternatives: alternative 1 has greater impacts than alternative 4.

The DEIS analyzed impacts to coho salmon at the 5th field (planning area) scale (DEIS 4-22). When analyzed from the perspective of impacting 5th field watersheds, no individual BLM timber sale is likely to have observable cumulative effects. When impact analysis at the 5th field scale results in no observable impact, smaller spatial scales must be used. Since vegetation removal proposals and road systems are concentrated in the upper portions of 6th and 7th field watersheds where coho salmon

42-6

spawn, impacts should also be assessed at these watershed scales. Impacts to each coho population in Table 3-4 (DEIS, p.3-4) should be assessed to be consistent with the Ninth Circuit's PCFFA decision. A particular concern is the existing road system and high density of roads likely to spew fish killing sediment into streams during the next rain-on-snow event. Vulnerability to rain-on-snow events in each coho salmon tributary should be calculated (DEIS p. 4-4).

The cumulative effects of road building and logging are not adequately disclosed because the baseline for impact comparison (no action alternative) has already been impacted by decades of logging and roadbuilding (DEIS p. 4-31). Previous logging and road building are not tabulated in Tables 2-1 (DEIS p. 2-20-21). The fisheries analysis inappropriately dismisses the cumulative impact of decades of previous logging by using the no action alternative as baseline. Cumulative impacts of logging at scales larger than individual management units should include the past and expected impacts from previous logging. In other words, the BLM cannot erase the impacts of previous logging by continually assessing the incremental impact of new logging without acknowledging the context for this new logging: an already heavily impacted landscape (upper Kelsey Creek DEIS p. 4-31).

Proposed logging does not comply with the ESA because the DEIS does not identify a valid Biological Opinion from the National Marine Fisheries Service for threatened coho salmon. The Ninth Circuit has found previous biological opinions for BLM timber sales to be invalid because they do not comply with the Aquatic Conservation Strategy. The DEIS (p.4.22) erroneously states that the proposed action meets terms and conditions of the NMFS LRM/RMP Biological Opinion of March 18, 1997.

The BLM has failed to analyze and quantify site specific accelerated soil erosion from project proposals such as regeneration logging and road building. Instead of doing the NEPA, RMP and ESA required project level, site specific analysis, the DEIS (p. 4-3) inappropriately references a programmatic EIS (the Medford District 1994 RMP). The 1994 RMP/EIS did not disclose site specific erosion and sedimentation impacts and specifically stated that such impacts would be assessed at the project level.

The DEIS provides no analysis or documents to support the statement that "all harvest units would be on stable ground as well as proposed road locations" (DEIS p. 4-4). Natural erosion risk and risk of sediment reaching stream channels would be greatly increased on 628 acres of steep lands proposed for regeneration (clearcut) logging (DEIS p. 2-11). For example, units 1-2, 6-5, 27-4, 27-3 are on 50-80 percent slopes within a few hundred feet of perennial or fish bearing streams. The DEIS (A-69) erroneously states that "[N]ew permanent and temporary roads would not contribute sediment to streams because they would be built on ridges and on other stable terrain away from streams." Mid-slope road 32-9-13 (Maps 2 and 4) would be extended 0.3 miles on a 40 percent slope and would cross one stream channel. The new portion of the road is about 900 ft from Kelsey Creek. Mid-slope road 32-9-13 crosses numerous drainages and has a high risk of causing mass erosion into Kelsey Creek. Road 32-9-13 demonstrates the inherent conflict between maximizing timber extraction (alternatives 1 and 2) and protection of fish habitat from increased sediment as required in ACS objective 5. Extending this mid-slope road does not comply with ACS objective 5. Decommissioning

42-7

the entire road would comply with the ACS, but only 0.6 miles of this road is proposed for decommissioning in alternatives 1 and 2 (DEIS p A-27).

The DEIS provides no analysis or supporting documentation that unmapped riparian reserves will prevent sediment from reaching streams (DEIS p A-69). Riparian reserves may reduce the impacts of accelerated erosion but will not stop all sediment. Similarly, repeated statements of actions that "minimize" sediment delivery to streams will not stop all erosion and sedimentation from project proposals. The DEIS must analyze and truthfully quantify what the sediment impacts are likely to be, especially during a large flood event that is certain to occur in the long-term. Certainly there is less sediment risk to fish from alternative 4 than alternative 1, but this is not stated or demonstrated to the decisionmaker. The decisionmaker and the public are currently being misled into believing that impacts to fish and aquatic creatures and the habitat that supports them are the same for all alternatives. This is contrary to the intent of NEPA.

The DEIS has detailed analysis of the proposed projects impacts from future wildfires. For example a fuel model was developed (Appendix 9). But the DEIS didn't correspondingly analyze the impacts associated with floods and resultant erosion. The DEIS did not develop a sediment model or assess increased erosion risk from proposed projects, especially regeneration logging and road construction. The BLM demonstrates a bias in emphasizing analysis that demonstrate positive impacts (fuels and fire) while ignoring analysis and modeling that may show adverse impacts (acres of increased erosion risk, tons of sediment delivered to stream channels). Catastrophic wild fire appears to be a driver for impact analysis (Fire and Fuels DEIS 4-6, Tables 4-1, 4-2). Although floods are certain to occur in the long-term, analysis of effects of catastrophic floods are missing from the analysis.

j. Commercial logging and road building on steep, erosion prone terrain is certain to have adverse sediment impacts and merits a "likely to adversely affect" determination for threatened coho salmon.

k. Pacific lamprey (*Lampetra tridentata*) is declining across its range, including the Rogue Basin. The DEIS failed to identify Pacific lamprey as a special status vertebrate (DEIS p. A-43). Pacific lamprey was listed state sensitive in 1993 (OAR 635-044-0130) and given further legal protected status by the state in 1996 (OAR 635-044-0130). The rare Western brook lamprey (*Lampetra richardsoni*) may also exist in the planning area. Culverts that pass salmonids are often barriers to lamprey because lamprey cannot jump. Culvert replacement may need to consider lamprey passage if lamprey ammocoetes are detected in stream reaches below the culvert.

l. Green sturgeon has been petitioned for federal listing. Green sturgeon may spawn in the planning area in the mainstem Rogue. Chemical applications and the misuse of fire retardant in the planning area could be detrimental to sturgeon reproduction.

### 5. Survey and Manage Species

The DEIS states that surveys for Special Status and Survey and Manage Species have not been completed. Assurances that "all required sites would be protected according to established direction

(42-8)

and protocols" are inadequate for impact analysis and decision making. Surveys should be completed for Survey and Manage species and the results should be disclosed in the DEIS, analyzed and mapped. The Public and the Decisionmaker cannot adequately analyze the impacts of alternatives without the incorporation of Survey and Manage Species locations into the DEIS. Species affected include red tree, Del Norte salamander, chace sideband, Oregon shoulderband, bluegrey and Pappillose tail-droppers, Oregon megomphix, Cypripedium fasciculatum, Bryoria tortosa, Dendriscoaulon intricatum, Platismatialacunose, Pseudocyphellaria rainierensis, Ramalina thrausta, Usnea longissima and Encalypta brevicolla var. crumiana.

**A. Red Tree Voles** - The Siskiyou Project requests a map displaying detections of red tree voles, as well as which occupied areas will be protected, and which ones will be logged.

i. Impact analysis of the DEIS is inadequate because a lack of surveys for Special Status and Survey and Manage Species precludes quantitative impact analysis required for decision making. How can site specific impacts to red tree voles be accurately described if no surveys have been completed?

ii. The DEIS provides for site specific logging of trees (timber sale units and vegetative treatments in maps 4,5,6) but fails to provide site specific descriptions of how Special Status and Survey And Manage Species will be protected. For example, high densities of red tree voles may make some timber sale units impractical to implement, leading to the elimination of prescribed buffers (DEIS 2-7). Recent reviews of BLM timber sales indicates BLM uses considerable discretion in the application of protection buffers for red tree voles. Some vole trees get protected and others do not. The Siskiyou Project and others must be provided timely opportunity to field inspect and comment on the effectiveness of protection measures identified for each timber sale unit well before the decision is signed. Current wording ("Required surveys would be completed for [Special Status and Survey and Manage Species] before a Record of Decision is signed" does not provide a review period for the public prior to decision making. This is contrary to the NEPA. A supplemental DEIS or some other notification is needed to describe the results of species surveys and explicitly map how protection measures will be implemented for red tree voles in each timber sale unit or vegetative treatment.

**B. Del Norte Salamanders** - Although Del Norte salamanders are supposedly "widely distributed across the watershed" (DEIS 3-13) and clearcutting (regeneration cutting) will cause adverse impacts (Survey and Manage FEIS), IMPACTS TO DEL NORTE SALAMANDERS HAVE NOT BEEN ASSESSED (DEIS 4-15). Since no surveys for Del Norte salamanders will be conducted, all habitats must be protected. BLM must identify and manage high-priority sites to provide for a reasonable assurance of species persistence. Until high-priority sites can be determined, BLM must manage all known sites (Survey and Manage ROD p. 11).

The Siskiyou Project requests a map indicating all known Del Norte salamander sites and high priority sites for Del Norte Salamanders (DEIS 3-13 and Survey and Manage ROD p. 11). Although no surveys for the actual animal are required, talus areas occupied by Del Norte salamanders are relatively easy to identify. All talus areas suitable as Del Norte salamander habitat should be identified and given protection as recommended in the ROD for survey and manage species (p.40).

42-9

Since talus areas would likely have soil constraints for regeneration logging, trees on talus sites within regeneration units should be protected.

## 6. Fuels

**Logging on certain sites can increase fuel loading of ground and near ground fuels.**

When shaded forest stands are thinned, there is a history of previously suppressed broadleaf species (tanoak and madrone for example) exhibiting greatly increased growth. This causes a corresponding increase in ground and near ground fuels. Risk of catastrophic fire can measurably increase from such thins. Though ladder fuels are reduced, ground fuels from untreated slash and from increased broadleaf growth create conditions that can cause cambium baking. Many stand replacement events are due to cambium baking near ground level rather than crown fire.

This impact is substantiated in the DEIS on page 3-11 which states "Partial cuts in the East Fork Kelsey Creek and Quail Creek areas have substantially increased the brush component, placing these areas at greater risk of stand replacement fire. Past clear cutting in the areas of Mule Creek, East Fork Mule Creek and North Fork Kelsey Creek has created additional risk of stand replacement fires through both brush invasion and new young plantations. This places older forest habitats at a greater risk to stand replacement fire." The quote describes conditions in the project area that were created by past forest management.

The proposed treatments in the Preferred Alternative (commercial thin, overstory removal, commercial density management, regeneration cutting) are not substantially different from those logging activities (partial cutting, clear cutting) that increased the risk of stand replacement wildfire historically; therefore the Preferred Alternative will similarly increase that risk. This is important because a Purpose and Need (page 1-3) is to "reduce fuel hazard in the planning area to avoid large losses of valuable resources." Logging will not only not achieve the Purpose and Need of the EIS, it largely work against the Purpose and Need.

Similarly, commercial thinning can convert oak/ madrone forests into brushfields. When madrone and oak species are cut, they often send out a flurry of sprouts. In a few seasons, a once well-formed bole and canopy is replaced with a shrub form of the species. This phenomena is widespread on BLM lands where fuels management is emphasized. The DEIS does not acknowledge that on some sites (e.g. ridges and south slopes where mature hardwoods now dominate the canopy), it may be best to maintain tree sized madrone and oak (>7" DBH) regardless of spacing to avoid converting an oak/madrone forest into a oak/madrone brushfield.

## 7. Connectivity, Fragmentation, LSR Habitat, Late-Successional Associated Species, Northern Spotted Owl

### A) Connectivity, Fragmentation, and Late-Successional Habitat

Years of logging in the Pacific Northwest have caused a decrease of closed canopy, mature and old forests. In addition, the remnant patches of closed canopy, mature and old forests have, because of this logging, been isolated. These two factors have created a crisis in our Northwest Forests that has

42-10

led to the population decline and Endangered and Threatened status of LSOG species. Though fire suppression is an important impact that has gone hand-in-hand with the logging, liquidation of our older forests is a primary concern that should be addressed. A primary focus of any Purpose and Need that relates to forest health and late successional enhancement should be the retention of closed-canopy forests and of the mature and older trees in these forests. Older, fire resistant trees should be left standing.

The Preferred Alternative would reduce connectivity, produce additional fragmentation, and degrade habitat for late successional associated species, thus increasing the risk of population declines. The degradation would occur in the project area but would have adverse ramifications outside of this area.

The Upper East Kelsey Watershed would, under the Preferred Alternative, receive 217 acres of regeneration logging (about 6% of the subwatershed and 7% of the late successional forest). Similarly, the Meadow Creek Watershed would receive 128 acres of regeneration logging (about 5% of the subwatershed). These are both currently pristine watersheds that supply excellent connective and late successional habitat, and they will be significantly degraded by the proposed logging.

The way the impacts are described (page 4-9) repeats the classic mistake of scale, whereby impacts are dismissed because they are considered "relatively" minor at a certain scale but accumulate to impacts of landscape proportion as the localized populations decline and extirpations multiply. This is exactly what has created the crisis of habitat degradation and fragmentation that now exists. To describe the effects of regeneration logging of hundreds of acres of closed canopy forest in a critical connectivity area as "negligible" (page 4-8) is misguided and may indicate some fundamental misunderstandings of ecological principals. Similarly, to defer logging in heavily impacted areas and begin that same degradation process in nearby, relatively pristine watersheds (page 4-16) and then to claim only "a minor addition to the impacts on late-successional habitat" shows a disregard and/or misunderstanding of both fragmentation and cumulative effects. The three paragraph discussion of cumulative effects on late-successional habitat (4-16) is inadequate. Real analysis of this very important issue is required and without meaningful analysis, neither the Public nor the Decisionmaker is able to understand the impacts of the Preferred Alternative.

The DEIS (page 4-9) points out that "the effect of regeneration harvest in Alternatives 1 and 2 in the Upper East Kelsey and Meadow Creek subwatersheds would be great enough that there may be some reduction of habitat use and impedance of movement by late-successional affiliated wildlife. The effects of these proposed regeneration harvest units on currently closed-canopy north-facing slopes would be greater than in other areas because of their strategic location in relation to this LSR further highlighted by the Southwest LSRA (USDA/USDI) which emphasizes the importance of an east-west older forest link. This connection would be affected by these proposed activities, as well because these two watersheds have previously had little or no timber harvest." Regarding the degradation of late-successional habitat, the DEIS reveals that "There would still be substantial direct adverse effects to late-successional habitat from regeneration harvest in East Fork Kelsey and Meadow Creek sub-watersheds." (page 4-16)

42-11

The DEIS describes the Upper Kelsey watershed as "an area expected to provide habitat connectivity. Consequently, habitat removal of 217 acres would not be consistent with the intent of this alternative, although scale is important to factor in." (page 4-9) Why is this logging a part of Alternative 2, the Preferred Alternative, if it is not consistent with the intent of this alternative regarding connectivity goals?

In all alternatives, non-regeneration cuts such as commercial thins may also decrease connectivity and habitat for closed-canopy associated species. The affect of reduction of crown closure varies from species to species with some species (such as Del Norte salamander) particularly sensitive and vulnerable. Marking and logging with the intention of retaining a certain percent crown closure is an imperfect science and the effects of blowdown and prescribed fire can further "open up" stands. The potential for commercial thin units, commercial density management units and overstory removal units (as well as regeneration logging units) to cause closed-canopy habitat degradation, fragmentation, and loss of connectivity was not adequately described or analyzed in the DEIS.

Due to the habitat degradation described above, species associated with and dependent on closed-canopy and mature and older forests will suffer from the logging activities bundled in the Preferred Alternative. Please refer to Section 3 (Survey and Marge) for a listing of some of those species. Other species that will be compromised include fisher, pine marten, white-footed vole, bald eagle, northern goshawk and *Benzoniella oregana*. Many other plant, fungi, and invertebrate animal species will also be impacted.

Please remember that the Northwest Forest Plan was designed as a Minimum needed to retain viability of Northern spotted owl and other late-successional associated species and thus as a Minimum needed to retain a functioning late-successional ecosystem over the range of the Northern spotted owl. Meeting minimum requirements is far different from maintaining and providing optimum (or even "average") habitat.

#### B) Northern Spotted Owl

Presently, there are 28 Northern spotted owl "core areas" in the Project Area, and 13 (46%) of the areas fail to meet even the minimum viability requirements. This constitutes a spotted owl crisis for the planning area. With 46% of the spotted owl pairs in a "non-viable" habitat situation, the response should NOT be to decrease the habitat in the Project Area's stronghold of Northern Spotted Owls even if the BLM believes these core areas would retain habitat meeting its minimum viability requirements. The Preferred Alternative would "remove or degrade a total of 370 acres of currently suitable northern spotted owl habitat". (pg. 4-18) This does not include the significant habitat loss and disturbance impacts associated with the partial cut treatments that are a part of the alternative. The KCNA and Kelsey's Demise (a strange, sad name for a spotted owl area) spotted owl pairs will be especially hard hit.

Critical Habitat Areas are designated under the Endangered Species Act. The Preferred Alternative would degrade or remove 1,259 acres of suitable owl habitat most all of which is in CHU-65. Connectivity is a major problem when addressing the challenge of Northern spotted owl viability. This CHU is designed to maintain a link through the Klarnath Province between the Cascade and

42-12

Coast Range Provinces (p 4-20) This linkage should be maintained rather than degraded if we, the Public, are serious about saving the Northern spotted owl from extinction.

At several places (pg. 4-18, 4-20), the DEIS maintains that there will be a benefit to late-successional habitat and thus to spotted owls as the management activities will reduce the risk of catastrophic fire that can eliminate and degrade owl habitat. As explained in these comments under "Fuels" (#6 above), Siskiyou Project maintains that the management activities of the Preferred Alternative will substantially increase the risk of stand replacement fire by opening up stands and increasing ground fuels as broadleaf understory grows and by creating plantations that aid in the spread of wildfire.

The proposed management activities will have serious adverse impacts on the Northern spotted owl. The BLM should have waited for the results of consultation with the USFWS regarding these effects, and disclosed them in the DEIS so the public would have had a chance to comment on them.

### C) Marbled Murrelet

Marbled Murrelet habitat is found in the Project Area. US Fish & Wildlife Service designated CHU #OR-07-F is also in the Project Area. The purpose of the Critical Habitat Unit is to provide habitat for this ESA Threatened species. No murrelets have been observed in the Project Area and the area is further from the Ocean (greater than 12 miles) (pg. 3-15). The Project Area is approximately 28 miles from the Coast. Siskiyou Project wants to point out 3 facts: 1) Murrelets have are known to breed upwards of 35 miles from the Coast, 2) In the nearby South Fork Coquille Drainage/ Siskiyou National Forest (Hall Ridge), murrelet "occupied behavior" has been documented about 25 miles from the Coast and 3) In the nearby Elk River drainage/ Siskiyou National Forest (Blackberry and Panther Creeks), the agency conducted protocol surveys and repeatedly reported absence of murrelets, but independent surveys conducted in the less accessible streambottoms actually found occupied behavior and a nest site.

The analysis of the Preferred Alternative on Marbled Murrelet habitat and on the CHU is insufficient.

## B. Forestry Related issues

A. Blowdown - The DEIS does not disclose the increased risk of blowdown inherent with thinning and regeneration logging. The BLM must address the following questions with respect to blowdown:

- i. Is blowdown anticipated and desired, inside and outside timber sale units?
- ii. Were the effects of blowdown on adjacent forest stands considered?
- iii. Are there expected to be any adverse environmental effects resulting from blowdown?
- iv. How will blowdown be treated? Will blowdown generate another entry with resultant soil and water impacts?

B. Sugar pine treatments - Siskiyou Project supports thinning around old sugar pines. However, the treatments should be confined to the (approximately) the dripline of the crown of the sugar pine tree.

42-13

C. Soil impacts – Soil impacts from logging including compaction and erosion were not adequately described and adverse impacts from erosion and compaction of soils were not adequately analyzed in the Environmental Consequences section (pgs. 4-3&4).

D. Cumulative effects of decades of logging not illustrated - A map of existing seral stages within the project area is needed. The DEIS is inadequate because it does not show the location of previous logging units and dates they were logged in the watershed nor does it show logging units for recent or future sales (Mule timber sale). The maps for various Alternatives give a perception that there has been no previous logging in the planning area.

F. Number and size of trees proposed for logging not disclosed - At a minimum, the DEIS should disclose the estimated or actual number of large trees to be logged in each unit (mature trees 21-31 inches; old growth trees greater than 32 inches diameter breast high). Impact analysis in the environmental assessment is inadequate if decisions about the size and number of trees to be logged are not evident to the public and decisionmaker at the time the FEIS is released. Delaying determinations of the size and number of trees to be logged until after environmental analysis is written and after a decision has been made is inconsistent with the need for full disclosure of impacts before decisions are made (National Environmental Policy Act). The Siskiyou Project and its members will be harmed if the BLM does not fully disclose the size and number of trees proposed for logging in the Kelsey Whisky planning area before a decision is made.

Describing impacts in terms of board feet may be helpful to a prospective purchaser but is inadequate in determining ecological and visual impacts. Descriptions of proposed logging in terms of tree retention may be helpful in determining compliance with the Northwest Forest Plan Standards & Guidelines, but such descriptions do not describe the effects of proposed logging in terms of tree removal.

G. Irreversible and Irretrievable Commitment of Resources not disclosed: loss of large diameter trees - If logging includes the removal of a significant number of old growth trees (trees over 32 inches), this would represent an irreversible or irretrievable commitment of resources. The DEIS must be amended to report how many trees over 32 inches DBH will be logged and removed with various alternatives. How does the number of trees over 32 inches DBH to be logged vary across alternatives and timber sale units? The public and decisionmakers need to be provided quantitative information about the number of large trees that will be logged. The general, non-specific reference to an Irreversible and Irretrievable Commitment of Resources (p. 4-31) regarding late-successional habitat is not sufficient.

## 9. Noxious Weeds

The Preferred Alternative, through regeneration logging, temporary road construction and road reconstruction will create conditions conducive to the spread of noxious weeds already found in the Project Area and increase the risk of contamination of new invasive species. The fact that some disturbed areas will eventually "close in" and native vegetation will out-compete native species (pg. 4-31) is only partly true and is in contradiction to most Federal Agency policy which understands the

42-14

danger in spreading weeds, creating a larger "bank" of seed and plants which can take advantage of open landscapes (such as roadsides) and other disturbed areas (logging units and burned areas). As such, the Environmental Consequences are glossed over and not adequately conveyed. This is a serious problem regionally, locally and in the planning area. It is disappointing that specific control measures are not identified in the DEIS and that there are no specific projects in the Preferred Alternative that treat populations in the Project Area.

## 10. Recreation and Economics

The Wild & Scenic Rogue River is a nationally (even globally) famous destination used by local citizens as well as tourists. It is a mecca for white-water enthusiasts, fishermen, hunters, and hikers. The River classification through the Planning Area is "Wild" and the Rogue River Trail passes through the Planning Area. Recreationists value the pristine and natural parts of the landscape as opposed to its logging units. Private land owners in the Planning Area value the natural conditions also, and some plan to use their property to derive income from recreational users.

Though the Preferred Alternative is designed to "hide" its visual impacts from the area's users, there will be substantial impacts and degradation of the recreational resource. In several places, management activities (including Commercial Density Management logging) would take place less than one mile from the Rogue River. Helicopter logging, chainsaw use, tractor logging, log truck traffic, and other impacts will create noise, dust, and possible visual impacts.

The DEIS doesn't reveal the impacts of the Preferred Alternative (or other alternatives) on this critical, multimillion dollar resource. The Reviewing Public and the Decisionmaker is not educated as to the impacts. For example, the reviewers could find no mention of noise in the DEIS. Noise levels from logging can clearly impact the recreational experience. It is also unclear how the Preferred Alternative affects the visual resource. That we are told: "implementation of project design features that do not attract the attention of the casual observer viewing from key observation points" are allowed is not good enough. More detail is required.

The effects on recreation also affect the economy. The Wild & Scenic Rogue generates \$13 million per year for the local economy. The infrastructure of this economy relies on the natural values of the Rogue River - wildlife, fish, water quality, and forests. The Preferred Alternative will degrade these values.

## 11. ACEC and RNA

The DEIS proposes an ACEC with a nested RNA in the East Fork Whiskey Creek. The ACEC conserves several plant community types including the "largest known block of relatively unentered forest representing the Douglas fir/ tanoak series in the Medford District". (pg. 3-6) Two scenarios for ACEC designation (Preferred Alternative-1,676 acres and Alternative 4 - 2,843 acres). The larger ACEC is clearly preferable from a research and biological view. The larger area will be more likely to retain the ecological characteristics (more defensible from disturbance events, less effected by management activities outside the ACEC, etc.) and baseline conditions which speak to the

purposes of RNAs and ACECs.

42-15

## 12. Wild and Scenic River Act Issues

Section 1283 of the Wild and Scenic Rivers Act directs the BLM to "to protect such rivers in accordance with the purposes of [the Act]." 16 U.S.C. § 1283(a). The Kelsey Whisky planning area is adjacent to the quarter mile boundary of the Rogue River. As the Ninth Circuit held in Wilderness Society v. Tyrrell, logging and other management activity, whether conducted on land within the river area's boundaries or adjacent to the river area, will impact protected values.

The requirements for managing land under the Wild and Scenic Rivers Act are specified in sections 1281 and 1283. As noted above, section 1281 directs that:

Each component of the national wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values. In such administration primary emphasis shall be given to protecting its esthetic, scenic, historic, archeological, and scientific features.

Section 1283 requires that any federal agency with jurisdiction over lands within or adjacent to a designated river system "take such action . . . as may be necessary to protect such rivers in accordance with the purposes of this chapter." 16 U.S.C. § 1283(a). The provision notes that "particular attention shall be given to scheduled timber harvesting . . . which might be contrary to the purposes of [the Act]." *Id.*

In addition to general requirements designed to ensure that the purposes of the Wild and Scenic Rivers Act are respected, section 1283 specifically requires that federal agencies "cooperate with the Secretary of the Interior and with the appropriate State water pollution control agencies for the purpose of eliminating or diminishing the pollution of waters of the [designated] river." 16 U.S.C. § 1283(c).

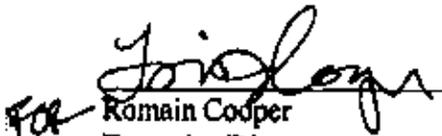
The proposed activities presented in the Kelsey Whisky DEIS pose an unacceptable risk to water quality, recreation, and fish, primary values of the Rogue River. The effects of the proposed activities to the Wild and Scenic River values of the river were not adequately analyzed in the DEIS. Past management activities have caused severe sedimentation problems in the river, affecting fish, water quality, and recreation. Many of these problems are ongoing, such as sediment delivery from existing roads. The DEIS did not evaluate the cumulative impacts of past, present, and foreseeable activities to on the Wild and Scenic values of the Rogue River.

42-16

**13. Global climate change.**

In light of near scientific certainty from the latest team of UN scientists that humans are causing global warming, and the fact that the US government is advocating credits for carbon sequestration in forests, the BLM needs to disclose the adverse effects of carbon emissions from burning and removal of mature trees. How much carbon do the various alternatives put into the atmosphere and what does it do (cumulative impact)? "New information" as defined by NEPA suggests that alternatives in EAs and EISs recognize a carbon sequestration alternative that would retain healthy trees and reduce or eliminate burning.

Sincerely,

  
Lori J. Cooper  
Staff Attorney  
Richard K. Nawa  
staff ecologist  
Romain Cooper  
Executive Director

# Headwaters

To conserve, protect and restore forest ecosystems, clean water,  
and biological diversity in the Klamath-Siskiyou Bioregion.

July 12, 2002

43-1

Sherwood Tubman  
Ecosystem Planner  
Glendale Field Office  
Medford BLM  
3040 Biddle Road  
Medford, Oregon 97504

Dear Ms. Tubman,

Thank you for the opportunity to comment on the *Kelsey Whisky Draft Landscape Management Plan, Associated Medford District Resource Management Plan Amendments and Draft Environmental Impact Statement*. These comments are submitted for Headwaters.

This EIS is more clear and concise than many of the environmental documents that the BLM submitted in the last year. We greatly appreciate the clarity that this document provides. However, we still have some questions and concerns about the proposal.

## Alternative Four versus No Action

Alternative Four is a very appealing alternative. While it lacks several critical elements that would prevent Headwaters from exhausting administrative remedies, it proposes no new roads and no regeneration cutting. New roads and regeneration cutting are two major triggers for our opposition to many BLM proposals.

We are certainly concerned with the proposed alternative's improvement of primitive roads. Improving a road often is as detrimental or worse than building a new road. We are skeptical of many road improvement proposals when it is clear that road decommissioning is what should be occurring on BLM land. Using existing roads and properly maintaining them for proposed activities is a better direction for the BLM to head.

We would like to see a diameter limit included with alternative four. While it is merely a social tool and is not based in Silviculture, due to scarcity, the big trees should be left standing in the forest more often than not. Naturally, this goes against the Medford BLM's traditional tendency to find volume by cutting the largest trees.

We would also like to have a more reasonable opening size created from the large pine maintenance. A quarter of an acre is too big. Please consider having the dripline as the limitation for the clearance around the large pines. It seems that you would want to maintain many of the larger conifers that are growing with the pines and were established prior to fire suppression. What science does the BLM utilize to justify the quarter acre and less opening to reduce stress (EIS 2-12)? Please explain a scenario that would require a quarter acre opening around a pine to reduce stress.



These modifications would have us seriously considering alternative four as our recommendation. However, without those changes, we are forced to favor the no action alternative for the protection of biological integrity that it provides.

BLM Preferred Alternative Two

Alternative two is clearly unacceptable. This alternative proposes regeneration harvest, a process that is counter to the recommendations for harvest in the Wild Rogue North Watershed Analysis. The WA states "in older stands, treatments should be conducted to reduce competing vegetation and ladder fuels, remove accumulation of small diameter, dead fuels and improve vigor of existing stands. This could be accomplished in some cases by removing the intermediate canopy through commercial thinning" (WA pg. 139). Regeneration cutting removes nearly everything.

The WA also recommends providing connectivity (WA pg. 140). The EIS argues that "the proposed timber sales in the northeast portion of the EIS area would be modified to provide a higher level of connectivity for species associated with late-successional forest habitat than would be provided by alternative one" (EIS pg. 2-14). While this may be true, the WA recommends providing for connectivity in general and does not ask for a comparison to an extreme alternative (alternative 1 in this case) in future proposals. Furthermore, this EIS does not show that connectivity will be maintained. This cannot be done until surveys (survey and manage-see below) are completed and populations identified.

Survey and Manage

According to the DEIS, clearance surveys have not been completed for all Special Status and Survey and Manage Species (pg. X). While it is noble to promise the protection of species if discovered, the surveys should have been completed before now. Scoping occurred in 1999 and the DEIS was released in 2002. Why are the surveys not complete? How can the BLM adequately disclose all of the impacts, including cumulative impacts and impacts to connectivity, when the surveys are incomplete? How is the public supposed to consider the proposal without complete survey and manage information?

Best Available Science

When considering the best available science surrounding fuel hazard reduction and other scientific aspects of this proposal, what did the ID team look at? Did the team consider the spring 2001 issue of Fire Management Today (volume 61-no. 2)? This USDA Forest Service publication has insightful management recommendations for managing fire in areas without roads. The Kelsey Whisky project area contains areas without roads (Kelsey Whisky DEIS 1.4.4) and defacto wilderness in the form of the Zane Grey Roadless Area. The recommendations from the scientists in this USDA publication may or may not be applicable to the Kelsey Whisky project. Please distinguish the applicable recommendations from those that are not.

Within the spring 2001 issue of Fire Management Today, Dominick DellaSala and Evan Frost, locally based scientists, offer *An Ecologically Based Strategy For Fire and Fuels Management in National Forest Roadless Areas*. In this analysis, DellaSala and Frost provide numerous citations showing that "Scientists widely agree that protecting roadless areas on the national forests from roadbuilding, commercial logging, and other forms of development will greatly enhance biodiversity and ecosystem conservation" (pg. 12). The goal of enhancing biodiversity and ecosystem conservation seems to mesh well with the "underlying premise" of the Kelsey Whisky DEIS alternatives: to maintain, protect or restore, or enhance relevant and important ecological and biological values (Kelsey Whisky EIS pg. Viii).

DellaSala and Frost also show that broad scientific assessments continue to conclude that fire hazards are significantly higher in intensively managed areas. This appears to be applicable to the Kelsey Whisky project

area and DEIS. Please consider these assessments and explain why, if at all, the conclusions from these studies are not applicable to the Kelsey Whisky project area.

I have enclosed a list of references from the DellaSala and Frost report. Please explain the applicability of the cited science to the Kelsey Whisky proposal. This list is contemporary and represents much of the best available science that the BLM will want to rely on for the Final EIS.

Wilderness

Please consider the impact of the Kelsey Whisky DEIS alternatives on Wilderness. How may each alternative impact the current wilderness and the potential for future wilderness additions? How will each alternative impact the portions of the planning area that are in the Wild Rogue Wilderness Area (Kelsey Whisky EIS 3-28)? Will the roadbuilding and logging alter the character of the Wild Rogue Wilderness Area, the Zane Grey roadless area or the unroaded portions not formally within the Zane Grey? NEPA mandates that you disclose these impacts.

Oregon Wild 2002 is a proposal that includes the Zane Grey Roadless Area and may be introduced this year. 46,000 acres is a big area for the EIS to ignore. Please consider the Oregon Wilderness Coalition's proposal and analyze the EIS for impacts to the wilderness character of the Zane Grey Roadless Area. If the Siskiyou National Forest administers the Wild Rogue Wilderness, what collaboration has occurred between the Forest Service and the BLM on the Kelsey Whisky proposal?

The DEIS noted potential conflicts with wilderness management guidelines when planning management actions in areas close to the wilderness boundary (pg. 3-28). What specifically does this refer to? What is the proposed solution for these conflicts with respect to the Kelsey Whisky proposal?

The Wild and Scenic Rogue River

The Wild and Scenic Section of the Rogue River is a world class recreation river. As noted in the EIS, the recreation activities from boating and fishing have a significant economic effect on local communities (pg. 3-24). The EIS asserts that the management practices for the Wild and Scenic section of the Rogue River and the Wild Rogue Wilderness Area are adequately covered by management plans for those areas (pg. 3-31). What effect will the EIS alternatives have on the Wild and Scenic values of the river? What proposed activities may affect the recreation experience? How will chainsaw and equipment noise, road use and traffic and other associated activities impact the recreation and wild and scenic values?

Area of Critical Environmental Concern

The DEIS proposes an ACEC in the East Fork Whiskey Creek. The DEIS proposes either a 1,676 acre ACEC (Alternative 2) or a 2,843 acres ACEC (alternative 4). The larger ACEC is the more logical choice from a research and biological view. The larger area will be more likely to retain the ecological characteristics and baseline conditions. If you do not agree with that statement please explain why.

Roads and Road Construction

Table S-2 on page xii refers to primitive roads to be improved. The EIS does not define primitive roads. What is a primitive road? According to Bill Yocum, the BLM does not have a definition for primitive road (conversation 7-12-02). Do all of the primitive roads that are to be improved have a pre-existing capital investment? Is the pre-existing capital investment a trigger for road designation? Are all of the primitive roads assigned road numbers and files in the BLM system? Of these primitive roads, which ones, if any, are considered trails or jeep roads?

Please help educate us on the road definition issue. How do you discern the difference between roads, primitive roads, and trails in the project area? The Wild Rogue Watershed Analysis has a different definition of a trail than

43-4

the EIS. Which is correct? How do you classify different types of roads? Clearing up the contradiction and clarifying the complexity around this issue will help the public better understand the BLM proposal. While this information may exist in BLM documents, it is very helpful that the public be able to examine this EIS and have a clear understanding without doing extensive research.

Cumulative Impacts

In the Environmental Consequences section, the DEIS claims that "Direct, indirect and cumulative impacts are addressed for each resource, use or management action" (pg. 4-3). The EIS provides a discussion on cumulative impacts with respect to Late-successional habitat (pg. 4-16 and 4-31) but numerous "resources" and "management actions" exist that the EIS does not provide cumulative impacts analysis for. What is the cumulative impact from other management activities combined with the Kelsey Whisky EIS on soils, water quality and sediment production, fisheries, bald eagles, and spotted owl take? What activities is the State of Oregon implementing on its land that may be a cumulative impact?

Furthermore, it is imperative that the BLM does not simply provide a list of activities taking place in the area. "Cumulative impacts are the effects on the environment of each alternative when considered with the effects of past, present, and reasonably foreseeable future actions that might occur inside and outside the project area" (Kelsey Whisky DEIS pg. 4-3). Listing different projects that have, are, or will be occurring is a nice start but analysis is necessary for an adequate cumulative impacts assessment.

The Kelsey Whisky DEIS seems to be missing information on Riparian Reserves. These areas are not delineated on the maps. Please provide a map with the locations of the Riparian Reserves and any additional unstable areas. Why was this not provided initially? The public cannot adequately review this proposal without having a map delineating these areas.

**Hydrology**

Wetlands, Flood plains and Riparian Zones

If all streams except Mule Creek and upper Kelsey Creek are considered to be properly functioning, what is the status of Mule Creek and Kelsey Creek? Furthermore, does the terminology "all streams" include only perennial or does it include intermittent and ephemeral streams?

**Aquatic Conservation Strategy**

Please help educate me on the ACS direction to minimize peak streamflows (ROD b-9). How does the BLM interpret "minimize?"

Riparian Reserves and unstable areas

Due to the fact that moderately erosive and landslide prone soil occurs in the project area (pg. 3-4), it seems reasonable to expect those areas to be mapped. Please identify those areas on the map. How much volume is proposed by logging these areas? Will roadbuilding occur in these zones?

Water Quality and Temperature

The EIS mentions "some water quality limited streams, due to stream temperatures higher than the standard, but since the streams are undisturbed, the high water temperatures are a natural condition and would not be affected by any of the proposed alternatives" (EIS pg. 3-5). It is flawed logic to assume that because the water temperature is already high on some of these streams that the streams will not be affected by any of the proposed alternatives. Cannot the temperature increase in these streams? Do the streams contain refuges where

(43-5)

the temperature is cooler and thus activities could impact the cooler locations of the streams or the body of water the tributary feeds? Perhaps this is not the case. But it seems reasonable to strive for cooler temperatures with our land management activities. We believe this is natural. What streams are limited by high temperature? I want to point out that insect and disease epidemics are often "natural" but the BLM aggressively supports resisting those epidemics, so why not try to instate measures that will help decrease the temperature of the streams?

Conclusion

While these are Headwaters comments, I think the greater conservation community would agree with the following statement. We would very much like to come to the table and work with you to modify alternative four in order to achieve a more palatable project (thus, avoiding administrative remedies) while still removing commercial product from the forest.

Sincerely,



Derek Volkart  
Conservation Coordinator

43-6

Scientific assessments of Federal lands generally conclude that previously roaded and logged areas should be the highest priority for fuels reduction and forest restoration treatments.

## References

- Aber, J.; Christensen, N.; Fernandez, I.; Franklin, J.; Hidingen, L.; Hunter, M.; MacMahon, J.; Mladenoff, D.; Pastor, J.; Perry, D.; Slangen R.; van Miergroet, H. 2000. Applying ecological principles to management of the U.S. National Forests. *Issues in Ecology*. No. 6.
- Agee, J.K. 1993. *Fire ecology of Pacific Northwest forests*. Washington, DC: Island Press.
- Agee, J.K. 1995. Alternatives for implementing fire policy. In: Brown, J.K., and others, eds. *Proceedings: Symposium on Fire in Wilderness and Park Management*, 1993 March 30–April 1; Missoula, MT. Gen. Tech. Rep. INT–GTR–320. Missoula, MT: USDA Forest Service, Intermountain Research Station: 107–112.
- Agee, J.K. 1997. Severe fire weather: Too hot to handle? *Northwest Science*. 71: 153–156.
- Agee, J.K. 1998. The landscape ecology of western forest fire regimes. *Northwest Science*. 72 (special issue): 1–12.
- Amaranthus, M.P.; Perry, D.A. 1994. The functioning of ectomycorrhizal fungi in the field: Linkages in space and time. *Plant and Soil*. 159: 133–140.
- Arno, S.F. 1996. The seminal importance of fire in ecosystem management—Impetus for this publication. In: Hardy, C.C.; Arno, S.F., eds. *The use of fire in forest restoration*. Gen. Tech. Rep. INT–GTR–341. Ogden, UT: USDA Forest Service, Intermountain Research Station: 3–6.
- Associated Press. 2000. Wire story. August 17.
- Baker, W.L. 1989. Effect of scale and spatial heterogeneity on fire-interval distributions. *Canadian Journal of Forest Research*. 19: 700–706.
- Bernton, B. 1999. Fire prevention muddies goals for roadless areas. *Oregonian* (Portland, OR). November 28.
- Beschta, R.L. 1978. Long-term patterns of sediment production following road construction and logging in the Oregon Coast Range. *Water Resources Research*. 14: 1011–1016.
- Beschta, R.L.; Frissell, C.A.; Cresswell, R.; Hauer, R.; Karr, J.R.; Minshall, G.W.; Perry, D.A.; Rhodes, J.J. 1995. *Wildfire and salvage logging: Recommendations for ecologically sound post-fire salvage logging and other post-fire treatments on Federal lands in the West*. Eugene, OR: Pacific Rivers Council.
- Bessie, W.C.; Johnson, E.A. 1995. The relative importance of fuels and weather on fire behavior in subalpine forests. *Ecology*. 76: 747–762.
- Biswell, H.H. 1999. *Prescribed burning in California wildlands vegetation management*. Berkeley, CA: University of California Press.
- Bunting, S.C. 1996. The use and role of fire in natural areas. In: Wright, R.G., ed. *National parks and protected areas: Their role in environmental protection*. Cambridge, MA: Blackwell Science: 277–301.
- Chang, C.R. 1996. Ecosystem responses to fire and variations in fire regimes. In: *Status of the Sierra Nevada: Sierra Nevada Ecosystem Project, final report to Congress. Vol. II: Assessments and scientific basis for management options*. Wildl. Res. Ctr. Rep. No. 37. Davis, CA: University of California–Davis, Center for Water and Wildland Resources: 1071–1099.
- Council on Environmental Quality. 2000. *Managing the impact of wildfires on communities and the environment. A report to the President in response to the wildfires of 2000*. September 8, 2000. Website <<http://www.whitehouse.gov/CEQ/firereport.html>>. Washington, DC: Council on Environmental Quality.
- Countryman, C.M. 1955. Old-growth conversion also converts fire climate. *Fire Control Notes*. 17(4): 15–19.
- Crutzen, P.J.; Goldammer, J.G., eds. 1993. *Fire in the environment: The ecological, atmospheric, and climatic importance of vegetation fires*. New York, NY: John Wiley.
- Deeming, J.E. 1990. Effects of prescribed fire on wildfire occurrence and severity. In: Walstad, J.D.; Radosevich, S.R.; Sandberg, D.V., eds. 1990. *Natural and prescribed fire in Pacific Northwest forests*. Corvallis, OR: Oregon State University Press: 95–104.
- DellaSala, D.A.; Olson, D.M.; Barth, S.E.; Crane, S.L.; Primm, S.A. 1995. Forest health: Moving beyond the rhetoric to restore healthy landscapes in the inland Northwest. *Wildlife Society Bulletin*. 23(3): 346–356.
- Dombeck, M. 2000. Letter to Senator Jeff Bingaman (D–NM), May 23. File code 1500. Washington, DC: USDA Forest Service.
- Ercelawn, A. 1999. *End of the road. The adverse ecological impacts of roads and logging: A compilation of independently reviewed research*. San Francisco, CA: Natural Resources Defense Council.
- Everett, R.L.; Hessburg, P.F.; Jensen, M.; Bormann, B. 1994. *Eastside forest ecosystem health assessment. Vol. I: Executive summary*. Gen. Tech. Rep. PNW–CTR–317. Portland, OR: USDA Forest Service, Pacific Northwest Forest and Range Experiment Station.
- Fahnestock, G.R. 1968. *Fire hazard from pre-commercially thinning ponderosa pine*. Res. Pap. 57. Portland, OR: USDA Forest Service, Pacific Northwest Region Station.
- FEMAT (Forest Ecosystem Management Assessment Team). 1993. *Forest ecosystem management: An ecological, economic, and social assessment. Report of the Forest Ecosystem Management Assessment Team*. Portland, OR.
- Filip, G.M. 1994. Forest health decline in central Oregon: A 13-year case study. *Northwest Science*. 68(4): 233–240.
- Flannigan, M.D.; Harrington, J.B. 1986. A study of the relation of meteorological variables to monthly provincial area burned by wildfire in Canada (1953–1980). *Journal of Applied Meteorology*. 27: 441–452.
- Franklin, J.F.; Graber, D.; Johnson, K.N.; Fites-Kaufmann, J.; Menning, K.; Parsons, D.; Sessions, J.; Spies, T.A.; Tappeiner, J.C.; Thornburgh, D.A. 1997. *Alternative approaches to conservation of late-successional forests in the Sierra Nevada and their evaluation*. In: *Status of the Sierra Nevada: Sierra Nevada Ecosystem Project, final report to Congress. Addendum*. Wildl. Res. Ctr. Rep. No. 40. Davis, CA: University of California–Davis, Center for Water and Wildland Resources: 53–70.
- Fuller, M. 1991. *Forest fires: An introduction to wildland fire behavior, management, fire fighting and prevention*. Wiley Nature Editions. New York, NY: Wiley & Sons.

# Prescribed fire has important advantages over mechanical treatments in areas where ecological integrity and biodiversity conservation are high priorities.

Grant, C.E.; Wolff, A.L. 1991. Long-term patterns of sediment transport after timber harvest, western Cascade Mountains, Oregon, USA. In: Peters, N.E.; Walling, D.E., eds. *Proceedings of the Symposium: Sediment and Stream Water Quality in a Changing Environment: Trends and Explanations*; 1991 August 11-24; Vienna, Austria. IAHS Pub. 203, Wallingford, Oxfordshire, UK: International Association of Hydrological Sciences: 31-40.

Hagle, S.; Schmitz, R. 1993. Managing root disease and bark beetles. In: Schowalter, T.D.; Filip, G.M., eds. *Beetle-pathogen interactions in conifer forests*. New York, NY: Academic Press: 209-228.

Hann, W.J.; Jones, J.L.; Karl, M.G.; Hessburg, P.F.; Keane, R.E.; Long, D.G.; Menakis, J.P.; McNicoll, C.H.; Leonard, S.C.; Cravenmeier, R.A.; Smith, B.G. 1997. Landscape dynamics of the Basin. In: Quigley, T.M.; Arbelbide, S.J., eds. *An assessment of ecosystem components in the Interior Columbia Basin and portions of the Klamath and Great Basins*. Vol. II. Gen. Tech. Rep. PNW-GTR-405. Portland, OR: USDA Forest Service, Pacific Northwest Research Station: 337-1,055.

Hansen, D. 1999. Rugged road ahead: Conservationists, timber communities war over Federal plan to protect forests. *Spokesman-Review* (Spokane, WA). December 10.

Harvey, A.E.; Geist, J.M.; McDonald, G.I.; Jurgensen, M.F.; Cochran, P.H.; Zabowski, D.; Meurisse, R.T. 1994. Biotic and abiotic processes in Eastside ecosystems: The effects of management on soil properties, processes, and productivity. Gen. Tech. Rep. PNW-GTR-323. Portland, OR: USDA Forest Service, Pacific Northwest Research Station.

Henjum, M.G.; Karr, J.R.; Bottom, D.L.; Perry, D.A.; Bednarz, J.C.; Wright, S.C.; Beckwitt, S.A.; Beckwitt, E. 1994. Interim protection for late-successional forests, fisheries, and watersheds: National forests east of the Cascades crest, Oregon and Washington. *The Wildlife Society Technical Review*. 94-2.

Huff, M.H.; Ottmar, R.D.; Alvarado, E.; Vihnanek, R.E.; Lehmkuhl, J.F.; Hessburg, P.F.; Everett, R.L. 1995. Historical and current landscapes in eastern Oregon and Washington. Part II: Linking vegetation characteristics to potential fire behavior and related smoke production. Gen. Tech. Rep. PNW-GTR-355. Portland, OR: USDA Forest Service, Pacific Northwest Forest and Range Experiment Station.

Husari, S.J.; McKelvey, K.S. 1996. Fire-management policies and programs. In: *Status of the Sierra Nevada: Sierra Nevada Ecosystem Project, final report to Congress*. Vol. II: Assessments and scientific basis for management options. Wildl. Res. Ctr. Rep. No. 37. Davis, CA: University of California-Davis, Center for Water and Wildland Resources: 1101-1114.

Johnson, E.A.; Wowchuck, D.R. 1993. Wildfires in the southern Canadian Rockies and their relationship to mid-tropospheric anomalies. *Canadian Journal of Forest Research*. 23: 1213-1222.

Johnson, K.N.; Sessions, J.; Franklin, J.F. 1997. Initial results from simulation of alternative forest management strategies for two national forests of the Sierra Nevada. In: *Status of the Sierra Nevada: Sierra Nevada Ecosystem Project, final report to Congress*. Addendum. Wildl. Res. Ctr. Rep. No. 40. Davis, CA: University of California-Davis, Center for Water and Wildland Resources: 175-216.

Leenhouts, B. 1998. Assessment of biomass burning in the coterminous United States. *Conservation Ecology* (Website <<http://www.consecol.org/vol2/iss1/article>>). 2(1): 1-24.

Lehmkuhl, J.F.; Hessburg, P.F.; Ottmar, R.D.; Huff, M.H.; Everett, R.L.; Alvarado, E.; Vihnanek, R.E. 1995. Assessment of terrestrial ecosystems in eastern Oregon and Washington: The Eastside Forest Ecosystem Health Assessment. In: Everett, R.L.; Baumgartner, D.M., eds. *Symposium Proceedings: Ecosystem Management in Western Interior Forests*; 1994 May 3-5; Spokane, WA. Pullman, WA: Washington State University, Cooperative Extension: 87-100.

Massicotte, H.; Molina, R.; Tackberry, L.; Smith, J.; and Amaranthus, M. 1999. Diversity and host specificity of ectomycorrhizal fungi retrieved from three adjacent forest sites by five host species. *Canadian Journal of Botany*. 77: 1053-1076.

McKelvey, K.S.; Skinner, C.N.; Chang, C.; Erman, D.C.; Husari, S.J.; Parsons, D.J.; van Wagendonk, J.W.; Weatherspoon, C.P. 1996. An overview of fire in the Sierra Nevada. In: *Status of the Sierra Nevada: Sierra Nevada Ecosystem Project, final report to Congress*. Vol. II:

Assessments and scientific basis for management options. Wildl. Res. Ctr. Rep. No. 37. Davis, CA: University of California-Davis, Center for Water and Wildland Resources: 1033-1040.

Megahan, W.P.; Irwin, L.L.; LaCabe, L.L. 1994. Forest roads and forest health. In: Everett, R.L., ed. *Restoration of stressed sites, and processes*. Vol. IV. Gen. Tech. Rep. PNW-GTR-330. Portland, OR: USDA Forest Service, Pacific Northwest Research Station: 97-99.

Merrill, T.; Wright, G.R.; Scott, J.M. 1995. Using ecological criteria to evaluate wilderness planning options in Idaho. *Environmental Management*. 19(6): 815-825.

Meurisse, R.T.; Geist, J.M. 1994. Conserving soil resources. In: Everett, R.L., ed. *Restoration of stressed sites, and processes*. Vol. IV. Gen. Tech. Rep. PNW-GTR-330. Portland, OR: USDA Forest Service, Pacific Northwest Research Station: 50-58.

Morrison, P.I.; Karl, J.W.; Swope, L.; Harma, K.; Allen, T. 2000. Assessment of summer 2000 wildfires: Landscape history, current condition and ownership. Website <[www.pacificbio.org/fire2000.htm](http://www.pacificbio.org/fire2000.htm)>. Winthrop, WA: Pacific Biodiversity Institute.

Mutch, R.W. 1994. Fighting fire with prescribed fire—A return to ecosystem health. *Journal of Forestry*. 92(11): 31-33.

Mutch, R.W. 1997. Need for more prescribed fire: But a double standard slows progress. In: Bryan, D.C., ed. *Conference Proceedings: Environmental Regulation and Prescribed Fire*; 1995 March 15-17; Tampa, FL. Tampa, FL: Florida State University: 8-14.

NIFC (National Interagency Fire Center). 2000a. National Interagency Coordination Center: Incident management situation reports. Website <<http://www.nifc.gov/news/nicc.html>>. Boise, ID: NIFC.

NIFC (National Interagency Fire Center). 2000b. Wildland fire statistics. Website <<http://www.nifc.gov/stats/wildlandfirestats.html>>. Boise, ID: NIFC.

Noss, R.F.; Cooperider, A.W. 1994. *Saving nature's legacy: Protecting and restoring biodiversity*. Washington, DC: Island Press.

43-8

## Ecological benefits could flow from allowing some naturally ignited fires to burn in roadless areas under specific environmental conditions.

Perry, D.A. 1995. Landscapes, humans, and other ecosystem-level considerations: A discourse on ecstacy and laundry. In: Everett, R.L.; Baumgartner, D.M., eds. Symposium Proceedings: Ecosystem Management in Western Interior Forests; May 1994 3-5; Spokane, WA. Pullman, WA: Washington State University, Cooperative Extension: 177-192.

Pyne, S.J. 1996. Introduction to wildland fire. New York, NY: John Wiley & Sons.

Romme, W.H.; Despain, D. 1989. Historical perspective on the Yellowstone Fires of 1988. *Bioscience*. 39: 695-699.

Sanson, F.B.; Knopf, F.L. 1993. Managing biological diversity. *Wildlife Society Bulletin*. 21: 509-514.

Schlarbaum, S. 1999. Testimony before the House Resources Committee. 3 November. Washington, DC.

Schroeder, M.J.; Buck, C.C. 1970. Fire weather: A guide for application of meteorological information to forest fire control operations. Ag. Hbk. 360. Washington, DC: USDA Forest Service.

SNEP (Sierra Nevada Ecosystem Project). 1996. Status of the Sierra Nevada: Sierra Nevada Ecosystem Project, final report to Congress. Vol. I: Assessment summaries and management strategies. *Wildl. Res. Ctr. Rep. No. 37*. Davis, CA: University of California-Davis, Center for Water and Wildland Resources.

Southworth, D.; Valentine, L. 2000. Personal communication. Southern Oregon University, Ashland, OR.

Stephens, S.L. 1998. Evaluation of the effects of silvicultural and fuels treatments on potential fire behaviour in Sierra Nevada mixed-conifer forests. *Forest Ecology and Management*. 105: 21-38.

Strittholt, J.R.; DellaSala, D.A. In press. Importance of roadless areas in biodiversity conservation in forested ecosystems: A case study—Klamath-Siskiyou ecoregion. U.S.A. Conservation Biology.

Thomas, J.W.; Raphael, M.G.; Anthony, R.C.; Forsman, E.D.; Gunderson, A.C.; Hothausen, R.S.; Marcot, B.G.; Reeves, G.H.; Sedell, J.R.; Solis, D.M. 1993. Viability assessments and management considerations for species associated with late-successional and old-growth forests of the Pacific Northwest. Portland, OR: USDA Forest Service, Pacific Northwest Region.

Turner, M.G.; Hargrove, W.W.; Gardner, R.H.; Romme, W.H. 1994. Effects of fire on landscape heterogeneity in Yellowstone National Park. *Wyoming Journal of Vegetation Science*. 5: 731-742.

USDA/USDI (U.S. Department of Agriculture and U.S. Department of the Interior). 1995. Federal wildland fire management policy and program review: Final report. Washington, DC: USDA/USDI.

USDA/USDI (U.S. Department of Agriculture and U.S. Department of the Interior). 1997. Eastside draft environmental impact statement. Interior Columbia Basin Ecosystem Management Project. Portland, OR: USDA Forest Service, Pacific Northwest Region; USDI Bureau of Land Management, Oregon and Washington.

USDA Forest Service. 1995. Initial review of silvicultural treatments and fire effects on the Tye Fire. In: Environmental assessment for the Bear-Potato Analysis Area of the Tye Fire, Chelan and Entiat Ranger Districts, Wenatchee National Forest, Wenatchee, WA. Appendix A. Wenatchee, WA: USDA Forest Service, Wenatchee National Forest.

USDA Forest Service. 1996. National forest fire report 1994. Washington, DC: USDA Forest Service, Fire and Aviation Management.

USDA Forest Service. 1998. 1991-1997 wildland fire statistics. Washington, DC: USDA Forest Service, Fire and Aviation Management.

USDA Forest Service. 2000. Forest Service roadless area conservation. Draft environmental impact statement. Vol. 1. Washington, DC: USDA Forest Service.

van Wagner, C.E. 1983. Fire behavior in northern conifer forests and shrublands. In: Wein, R.W.; MacLean, D.A., eds. The role of fire in northern circumpolar ecosystems. SCOPE. New York, NY: John Wiley & Sons: 65-80.

van Wagtenonk, J.W. 1996. Use of a deterministic fire growth model to test fuel treatments. In: Status of the Sierra Nevada: Sierra Nevada Ecosystem Project, final report to Congress. Vol. II: Assessments and scientific basis for management options. *Wildl. Res. Ctr. Rep. No. 37*. Davis, CA: University of California-Davis, Center for Water and Wildland Resources: 1155-1166.

Walstad, J.D.; Radosevich, S.R.; Sandberg, D.V., eds. 1990. Natural and prescribed fire in Pacific Northwest forests. Corvallis, OR: Oregon State University Press.

Weatherspoon, C.P. 1996. Fire-silviculture relationships in Sierra forests. In: Status of the Sierra Nevada: Sierra Nevada Ecosystem Project, final report to Congress. Vol. II: Assessments and scientific basis for management options. *Wildl. Res. Ctr. Rep. No. 37*. Davis, CA: University of California-Davis, Center for Water and Wildland Resources: 1167-1176.

Weatherspoon, C.P.; Skinner, C.N. 1995. An assessment of factors associated with damage to tree crowns from the 1987 wildfire in northern California. *Forest Science*. 41: 430-451.

Weatherspoon, C.P.; Skinner, C.N. 1996. Landscape-level strategies for forest fuel management. In: Status of the Sierra Nevada: Sierra Nevada Ecosystem Project, final report to Congress. Vol. II: Assessments and scientific basis for management options. *Wildl. Res. Ctr. Rep. No. 37*. Davis, CA: University of California-Davis, Center for Water and Wildland Resources: 1471-1492.

Weatherspoon, C.P.; Skinner, C.N. 1999. An ecological comparison of fire and fire surrogates for reducing wildfire hazard and improving forest health. Presentation at conference: Fire in California Ecosystems: Integrating Ecology, Prevention and Management, 17-20 November; San Diego, CA.

Weatherspoon, C.P.; Musari, S.J.; van Wagtenonk, J.W. 1992. Fire and fuels management in relation to owl habitat in forests of the Sierra Nevada and southern California. In: Verner, J., McKevey, K.S.; Noon, B.R.; Gutierrez, R.J.; Gould, G.I.; Beck, T.W., eds. The California spotted owl: A technical assessment of its current status. Gen. Tech. Rep. PSW-CTR-133. Berkeley, CA: USDA Forest Service, Pacific Southwest Research Station: 247-260.

Wilderness Society. 1993. The living landscape: A regional analysis of Pacific salmon and Federal lands. Report. Washington, DC: Bolle Center for Forest Ecosystem Management.

Wilson, C.C.; Dell, J.D. 1971. The fuels buildup in American forests: A plan of action and research. *Journal of Forestry*. 69: 471-475.

Wright, H.A.; Bailey, A.W. 1982. Fire ecology: United States and southern Canada. New York: John Wiley. ■



# Zane Grey

## Wild Rogue Wilderness Additions

43-9

*A proposal to protect 46,646 acres in the Medford BLM District*



Memath-Siskiyou, Wetlands Center

*"I heard a rustle in the woods off of the old road when I looked up into a tree and saw a young bear climbing the tree. The bear just stopped and stared at me. It was a rare encounter for me to be that close to such a wild critter."*

-Jeff Wetherell,  
Wilderness Adopter

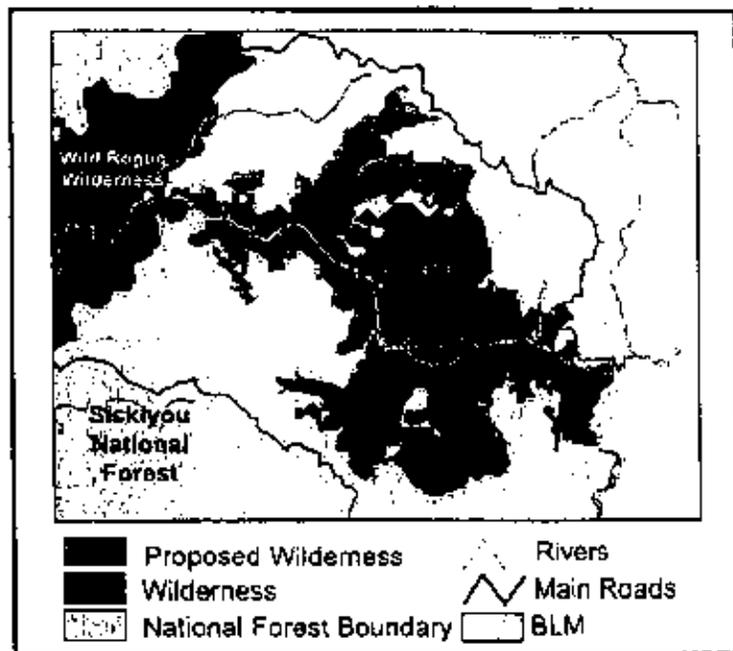
The Zane Grey Roadless Area is about 25 miles northwest of Grants Pass. It includes 24 miles of the Wild and Scenic Rogue River and is contiguous to the designated Wild Rogue Wilderness Area just downriver. The Zane Grey area is named after the famed adventure author who kept a cabin on the Rogue near this area.

Zane Grey is the largest forested BLM roadless area in the entire country. Due to its steep slopes and elevations ranging from 400-3800 feet, dozens of waterfalls cascade down the scenic canyon walls. Some of the best rafting in Southern Oregon is on the waters of the Rogue River through the Zane Grey roadless area. On the south side of the river is the Rainy Falls Trail, which ends at the largest waterfall on Rogue River proper, a favorite spot to view jumping salmon on their way to spawn. Also found in the Rogue River are steelhead, coho and chinook salmon, and coastal cutthroat trout.

Peregrine falcon, northern spotted owl, bald eagle, osprey, cougar, bear and Roosevelt elk are all known to inhabit the Zane Grey. Since many species use river corridors for migration, this area is a key

wildlife corridor between the inland habitat of the Rogue Valley and coastal forest habitat.

The wild experience of rafting the Rogue River will never be the same if the adjacent "matrix" land is logged. The best way to preserve this outstanding 25-mile stretch of the Rogue is through Wilderness designation.





44-1

June 12, 2002

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**Comments of the Klamath Siskiyou Wildlands Center  
On the Kelsey Whisky Timber Sale  
Draft Environmental Impact Statement**

"Partial cuts in East Fork Kelsey Creek and Quail Creek areas have substantially increased the brush component, placing these areas at greater risk of stand replacing fire. Past clear cutting in areas of Mule Creek, East Fork Mule Creek and North Fork Kelsey Creek has created additional risk of stand replacement fire through both brush invasion and new young plantations."

-2002, *Kelsey Whisky DEIS* at 3-11.

"Those who cannot remember the past are condemned to repeat it."

-1905, *The Life of Reason*, George Santayana

Thank you for accepting these comments on behalf of the Klamath Siskiyou Wildlands Center (KS Wild). We hereby incorporate the comments of Headwaters, the Oregon Natural Resources Council (ONRC), the Siskiyou Regional Educational Project (SREP), and the Northwest Environmental Defense Center (NEDC).

44-2

The preferred alternative (2) proposes building 1.9 miles of "temporary" roads and logging 9.4 mmbf through 969 acres of commercial "thinning" and 355 acres of clearcutting (regeneration harvesting) within late-successional habitat. The proposal will degrade 1,259 of critical habitat for the Northern spotted owl. Much of the proposed logging will increase the risk of catastrophic wildfire by opening the canopy, creating slash and encouraging brush encroachment. The proposal will also reduce the ability of the planning area to provide wildlife connectivity that is important on the provincial scale and vital to the attainment of the species viability objectives contained in the Northwest Forest Plan.

## FIRE

The DEIS is replete with references to the need "to reduce the risk of large wildfires" and of the danger presented by "unnaturally high fuel loading." No where is this more prevalent than in the Purpose and Need (S2.0) for the project. The DEIS goes on to propose prescribed fire treatments and some fuel treatments that will address this purpose and need for the project. Unfortunately these portions of the DEIS are mere side-boards to the bulk of the prescriptions which call for the significant reduction of canopy on 969 acres and the elimination of canopy closure on 355 acres. It is incontrovertible that the majority of the timber harvesting proposed in the project will *increase* the risk and severity of fire in the planning area.

Roads are a significant fire risk:

Research has shown that 78% of human-caused fires occurred within 265 feet of a road. Other studies have estimated that humans cause 90% of wildfires, and that over half of those are started from roadsides.

(Noss, Reed P. 1995. The ecological effects of roads or the road to destruction. The Road Ripper's Handbook. Road Removal Implementation Project. Missoula, MT.)

Also, the Forest Service Chief testified to the Senate Energy and Natural Resources Committee that 87% of the areas at high risk of catastrophic fire on the National Forests are in already roaded areas, while only 13% are found in roadless areas.

If the BLM is serious about preventing "catastrophic wildfire" instead of constructing yet more new logging roads, you will begin removing those that already exist. The DEIS fails to adequately consider and disclose the nexus between logging roads and wildfires.

Thinning does not mimic fire:

44-3

Thinning treatments may alter fire behavior but, depending on how prescriptions are applied, will not necessarily result in compositional or structural changes similar to those produced by non-lethal and mixed-fire disturbances of native forest ecosystems. (Hann et al. 1997; Graham et al. 1999).

The proposed "thinning" units comprise 969 acres of the timber sale. This treatment will open the canopy, resulting in drier conditions, increased presence of brush and the addition of slash to the planning area. As acknowledged on page 3-7 of the DEIS, many stands that still have an overstory of older trees, yet have lost some of their canopy closure, have developed an understory of dense brush thickets. It appears that the BLM is attempting to purposely create this stand composition in both the matrix and LSR thinning units.

Clearcutting (Regeneration Harvest) increases fire risk:

The authors of the DEIS go out of their way to discredit the "no-action" alternative by repeatedly contending that the no-action alternative somehow creates or increases the risk of catastrophic wildfire. Yet the environmental consequences section of the document is strangely silent in disclosing the impacts of clearcutting on fire behavior. The BLM could learn from the effects of past timber harvest in the planning area on fire risk and behavior. As stated on page 3-11 of the DEIS:

"Partial cuts in East Fork Kelsey Creek and Quail Creek areas have substantially increased the brush component, placing these areas at greater risk of stand replacing fire. Past clear cutting in areas of Mule Creek, East Fork Mule Creek and North Fork Kelsey Creek has created additional risk of stand replacement fire through both brush invasion and new young plantations."

Furthermore, the commercial logging proposed in the project will generate fine slash that fuels hot fires and will remove large, fire-resistant trees. The DEIS fails to harmonize these impacts with the alleged desire of the BLM to reduce the risk of catastrophic fire.

As stated on page 4-6 of the DEIS:

"Regeneration harvest units would see an increase of 20-35 tons per acre, and would be represented by a slash fuel model 12. These units would exhibit even higher rates of spread and flame lengths than the thinning units."

Fire suppression and the natural range of variability:

44-4

The DEIS bemoans the forest health problems resulting from "decades of fire suppression" (DEIS at 2-5 and 3-10) while stating the BLM's intention to continue with a policy of encouraging ODF to "take immediate action to control and suppress all fires." If there ever was an example of circular reasoning, this is it.

No serious attempt is made in the DEIS to determine if the decades of fire suppression have pushed the watershed outside of its natural range of variability. It appears that effective fire suppression was not obtained until "after world war two" (DEIS at 3-9) and that many Douglas-fir old growth stands in the planning area have experienced recent and natural "light underburns in the past several decades." DEIS at 3-7.

Nevertheless the BLM counts with confidence that it intends to: (1) clearcut and thin hundreds of acres; while (2) pursuing a doomed policy of total fire suppression; in order to (3) protect the forest from fire. Please disclose the literature and research that has led you to this curious policy of fire management.

## SURVAY AND MANAGE SPECIES

Currently the Kelsey-Whisky planning area is home to many survey and manage species including Del Norte salamanders, Mollusks, Red Tree voles, Fungi, Bryophytes and Lichens. It appears that the BLM prepared unit layouts and released the DEIS to the public for comment before completing the required surveys for these species. How can the public provide site-specific comments, and how can the BLM accurately assess the environmental impacts of the project, when we do not even know the location and frequency of survey and manage species?

It appears that the BLM intends to rely on the illegal 2001 ROD Amending the Northwest Forest Plan Survey and Manage Standards and Guidelines much as you relied on the illegal agency memos in 1999 in an attempt to shirk your duty to look for survey and manage species. While the BLM has made it clear that it intends to provide late-successional species with the minimum habitat that the law requires, and liquidate the maximum level of late-successional habitat that the law allows, reliance on the 2001 ROD fails to meet even the basic requirements for protection late-successional associated species. We look forward to the day when the BLM protects late-successional associated species of its own free will rather than as a result of a lawsuit.

## Del Norte Salamanders

44-5

Why have only "limited" surveys been completed? What will the site-specific impacts of broadcast burning be on Del Norte Salamanders? Does the BLM intend to respect Del Norte Salamander buffers or are you planning on logging within them? What provisions are being made for dispersal of Del Norte Salamanders into currently unoccupied talus slopes?

## Red tree voles

The EIS does not describe the RTV survey methods. In mature and late-seral habitat like that found in the planning area, the BLM is encouraged by the RTV survey protocol to climb trees increase the likelihood of finding all the RTV nests. The EIS is inadequate because it does not say how the surveys were conducted, so the public and the decision-maker have no way of knowing the likely effectiveness of the RTV surveys.

The EIS is inadequate because it does not describe whether or how inactive RTV nests were protected, or the extent of RTV sites that were discovered.

## Other S&M species

Is the BLM going to disclose the site-specific impacts of the Kelsey-Whisky timber sale on the species illegally dropped from pre-disturbance surveys (or dropped from the program entirely) by the 2001 ROD? For instance, you know the planning area contains rare "survey and manage" fungi associated with late-successional forests, yet you appear to wish to remain ignorant as to their location and frequency in the proposed harvest units.

## SPOTTED OWL CRITICAL HABITAT

KS Wild strongly objects to logging late successional forest in a spotted owl Critical Habitat Unit. The affected CHU OR-65 (and OR-67 to a lesser extent) is an essential east-west habitat link between the Coast Range, the Klamath Province Mountains and the Cascade Mountain Range. As described in the 1992 designation of critical habitat, critical habitat is intended to contribute to the recovery and eventual delisting of the owl. Regeneration harvest (clearcutting) of critical habitat will prevent these forests from fulfilling their designated role in the owl recovery. It is especially disappointing that the BLM is proposing to trash 1,259 acres of this CHU because it serves as an "inter-provisional link" that is essential for preventing the isolation of NSO populations in the Cascades, Klamaths and the Coast Range.

44-6

The DEIS contends (without justification or citation) that impacting 1,259 acres will not "adversely modify" the CHU because it "only" degrades 2% of the CHU. This conclusion is clearly baseless. The BLM fails to justify its conclusions and fails to inform the reader or decision maker of its plans for the remaining matrix acreage in the CHU. The BLM also fails to reveal the ability of existing LSRs (which you are illegally using as a surrogate for existing critical habitat) to provide the inter-provisional connectivity values associated with OR-65 and OR-67.

## AQUATIC CONSERVATION STRATEGY OBJECTIVES

The BLM is proposing to repeat practices that it knows have degraded the watershed in the past. The Mule Creek and Upper Kelsey Creek are currently "not properly functioning" due "to higher road densities and past timber harvest." DEIS 3-4. Hence it is inexplicable that the BLM would propose yet more new roading and regeneration harvesting in the planning area and contend that these practices will maintain or restore the objectives of the ACS.

### ACSO 1:

In attempting to explain how degrading over 1,200 acres of late-successional habitat in a regionally important connectivity corridor (and in Northern spotted owl critical habitat) will maintain ACSO 1 the BLM states:

"The original selection of proposed units considered the large scale distribution of habitats and connectivity at the watershed scale. Relatively isolated older stands, old partial cuts and young stands in need of thinning comprise the large majority of potential harvest units." DEIS A-67

In addition to being patently false, this statement does not relieve the BLM of its duty to ensure distribution, diversity and complexity of species and communities uniquely adapted to the planning area. Simply contending that you could have developed a timber sale that had larger impacts does not change the fact that this proposal will clearly inhibit attainment of ACSO 1.

In addition to degrading 1,259 acres of habitat critical to the recovery of the Northern spotted owl, the destruction of 217 acres in the headwaters of Upper Kelsey Creek and the liquidation of 119 acres in the headwaters Meadow Creek will inhibit attainment of ACSO 1.

44-7

As stated on page 4-9 of the DEIS:

"The most extensive regeneration harvest in alternative 2 would occur in Upper East Kelsey subwatershed, with a removal of 217 acres. This would include units #31-1, 6-2, 6-3, 6-4, 7-1, 35-1, 1-1, and 12-1. These units occur in the area expected to provide for connectivity. Consequently habitat removal of 217 acres would not be consistent with the intent of this alternative, although scale is also important to factor in...[a]dverse effects from 217 acres of proposed regeneration harvest would be substantial at the subwatershed level."

And on 4-10 regarding the Meadow Creek subwatershed:

"Regeneration harvest may impede some movement of late-successionally affiliated species between older forest patches."

And on 4-9:

"The effects of these proposed regeneration harvest (sic) on currently closed-canopy north-facing slopes would be greater than in other areas because of their strategic location in relation to this LSR, further highlighted by the Southwest Oregon LSR A which emphasizes the importance of an east-west older forest link. This connection would be affected by these proposed activities, as well as because these two subwatersheds have previously had little or no timber harvest."

Based on these impacts, we suspect that the BLM specialist who prepared the ACS consistency review was simply not familiar with the actual harvest proposals in the DEIS when they contended that "isolated older stands, old partial cuts and young stands in need of thinning comprise the large majority of potential harvest units." The proposed regeneration units are within intact ancient forests providing regionally important connectivity values for wildlife.

ACSO 2:

As with ACSO 1, the proposed Upper East Kelsey Creek and Meadow Creek units will not maintain or restore spatial and temporal connectivity between watersheds.

ACSO 3:

44-8

Please justify your conclusory statement that blading 17 to 27 miles of logging roads will result in merely "negligible, short-term effect[s] and would not impede recovery of the streams' historic sediment regimes." DEIS A-68

ACSO 4:

Your analysis of the potential impacts of wildfire on sediment delivery is shockingly biased. You only examine the impacts of "forest health" and fuels reduction on fire behavior. The impacts of regeneration harvesting, slash creation, open forest canopies and the removal of large fire-resistant trees also have impacts on fire risk and fire behavior.

ACSO 5:

Your peak-flow analysis relies on post-project mitigation measures rather than avoiding practices known to increase peak flows. Constructing logging roads and landings, and clearcutting large swaths of forest, is widely known to increase peak flows. Your contention that 30-year old tree farms are 100% hydrologically recovered ignores the important functions that down woody debris, uncompacted soils, and a multi-level canopy play in moderating peak flow events.

ACSO 8:

The public cannot provide site-specific comments and the decision maker cannot make an informed decision regarding ACSO 8. The DEIS fails to disclose the location, size, or yarding systems associated with proposed commercial density management harvest within so-called Riparian "Reserves."

ACSO 9:

Again, the ACS analysis is simply wrong in contending that "large blocks of unentered habitat were avoided in designing this project." See our comments on ACSO 1. The "adverse, localized effects on populations" will not maintain or restore habitat as required by ACSO 9. Furthermore, the destruction of regionally important connectivity corridors between LSRs and CHUs has the potential to inhibit attainment of ACSO 9 on a regional scale.

Coho:

The DEIS contends that ACS compliance will meet the needs of listed Coho Salmon. Unfortunately the project will not maintain or restore many of the objectives of the ACS and hence is not likely to meet the needs of listed fish species. Furthermore,

44-9

impacts to Coho were only analyzed at the 5<sup>th</sup> field scale. The DEIS must address potential impacts at the level of 6<sup>th</sup> and 7<sup>th</sup> field watersheds. Additionally, the DEIS must examine both short and long term impacts to these watersheds.

#### Road Reconstruction:

The increased use of reconstructed roads will also greatly increase erosion and sediment delivery. Reid and Dunne 1984; Potyondy, et al. 1993. Heavily used graveled roads contribute 130 times the amount of fine-grained sediment as abandoned roads. Reid and Dunne, 1984. Even though the project will increase traffic on many roads in and out of the project area, the DEIS fails to disclose which roads will have increased use, and then fails to analyze and disclose the impacts of the increased use on erosion and sediment delivery.

#### General Comments on the DEIS

Given the lack of site-specific information included in the DEIS it is very difficult for the public to provide site-specific comments. We offer these general comments for your consideration.

- The 46,646 acre Zane Grey roadless area is the largest *forested* roadless area managed by the BLM. Evidently the BLM did not find this worthy of mention in the DEIS. In fact the only mention of the unique roadless values present in the planning area is a grudging reference to scoping comments received from the public requesting protection for this last-best BLM roadless forest. While the "timber-first" culture in BLM may not recognize or place value on the existence of roadless forested areas, you have a duty to respond to scoping comments requesting an alternative that protects (and discloses) the roadless character of the planning area.
- The DEIS inexplicably rejects the requests received during the scoping process for protection of the roadless values of Zane Grey as "represent[ing] a larger scope of activity than had originally been envisioned..." DEIS 2-4. This nonsensical response to the reasonable scoping requests to avoid logging in the Zane Grey makes a mockery of the scoping process.
- It appears the ID-team did not include a soil scientist. It also appears that the BLM's only soil data comes from an order 3 recon survey at the landscape soil mapping project level. Please note that the Josephine County landscape soil data is useful for timber classifications but does not contain site-specific information regarding soil classifications, soil associations, or soil types. Is there a soils report

44-10

in the supporting documents of the EIS file? Has a BLM soil scientist visited the stands targeted for harvest in the planning area?

- It appears that category 1 "closed" roads in the planning area are actually experiencing significant ORV use that is not addressed in the DEIS.
- The BLM failed to address Port Orford Cedar (and associated root-rot) issues as required by *Kern v. United States Bureau of Land Management*, 284 F.3d 1062 (9th Cir. 2002).
- It appears the reproduction in existing clearcuts (regeneration harvests) in the planning area is spotty with large patches of brush and invasives. This is not addressed in the DEIS.
- Page 1-3 of the DEIS seems to suggest that the proposed ACEC could "replace" an existing heritage cell. Where is the cell that may be replaced?
- The DEIS offers no justification, rationale or analysis for the 1,200 acre difference in the size of the ACEC between alternatives 2 and 4. How will the 1,200 acre difference affect attainment of the "setting objectives" delineated on A-57?
- Page 1-6 of the DEIS contends that the impacts to late-successional habitat will only result in "short term (10-20 years) impacts." No analysis, justification or citation is given to substantiate this highly suspect contention.
- While the Watershed Analysis identifies connectivity between the Fish Hook/Galice LSR and the Galesville LSR as a concern (Wild Rogue North WA page 139) the DEIS explicitly logs stands that would address this alleged "concern" for connectivity.
- Page 1-7 of the DEIS introduces the possibility of commercial logging for biomass energy generation with absolutely no analysis or disclosure of impacts or issues surrounding this practice.
- The BLM considered (but eliminated) an alternative that would have allegedly "enhanced" LSR function by adding some ridge-top forests to existing LSRs. What aspects of existing LSRs require enhancement? We suspect connectivity between LSRs is the feature that would have been enhanced by this change.
- It is not acceptable, or legal, to log near, or yard over, historic trails as proposed in the DEIS.

44-11

- We commend the BLM for your alleged concern for Pine mortality in the planning area. We trust that this alleged concern will result in you halting the practice of total fire suppression that is resulting in the dense stands and Pine stress that you describe in the DEIS.
- The proposals to log up to 329 acres within the LSR to attain alleged "forest health" benefits makes no mention of the yarding or hauling systems that will be used to facilitate this commercial logging. The public cannot provide site-specific comments about the yarding and hauling systems, nor can the decision maker make an informed decision as to their impacts, because they are simply not disclosed in the DEIS. Does the BLM contend that yarding and hauling in the LSR will somehow help attain late-successional characteristics?
- The Watershed Analysis and the Kelsey Whisky DEIS indicate that portions of the planning area are below RMP and NFP standards for snags and down woody material. This deficiency is in large part due to previous harvest and salvage activities authorized by the BLM. It is our understanding that the proposed harvest activities will continue to cause a loss of natural snags in the planning area. This is particularly troubling for the hundreds of acres of LSR and RR areas targeted for commercial harvest. It is quite likely that many of the standing snags that are providing current actual habitat for cavity nesting species (as opposed to future speculative habitat from artificial "snag creation") will be felled as part of the harvest operation. Felling snags in LSRs and RRs in order to facilitate commercial logging will result in violations of the RMP and NFP and is antithetical to the very purpose of these so-called "reserves."
- As stated on 4-14 of the DEIS regarding large downed wood "regeneration harvests and commercial thins would further reduce and adversely impact this important structural characteristic for many wildlife species." And despite mitigation, "the net effect would still be below the level described in the latest standards." While this is troubling for the matrix stands in the planning (which are currently providing essential connectivity for species dependent on large down wood) it is clearly unacceptable in the many LSR and RR commercial thinning units. Please abide by the requirements of the NFP and RMP for providing snags and down wood.
- We urge the BLM to close logging roads 33-9-11 and 32-7-19.3 in order to protect unique resource values.

44-12

- As stated on page 138 of the WA, "Due to high road densities in upper Mule Creek and East Fork Kelsey Creek, efforts should be made to reduce open road densities in the watershed through decommissioning, barricading and gating."
- Your cumulative effects/impacts analysis on page 4-16 and 4-31 is conclusory and undocumented. Furthermore, the cumulative effects/impacts analysis is limited to a discussion of late-successional habitat. No attempt is made to examine or disclose the cumulative effects on hydrology, soils or fire behavior.
- The discussion of suitable Northern spotted owl habitat on 4-17 contains the same biased, misleading and incomplete fuels discussion found in many other sections of the DEIS. It raises the bogey-man of catastrophic fire "resulting" from the no-action alternative. However it contains no discussion of the effects of regeneration harvesting and commercial thinning on fuel loadings.
- Page 4-18 contends that leaving a 60% canopy closure will "not degrade suitable northern spotted owl habitat to a non-suitable condition." No literature or documentation is offered to support this highly questionable assertion. No discussion or analysis is offered regarding the actual use of recently thinned stands by NSOs. Furthermore table 4-9 reveals that commercial thinning will indeed degrade 649 acres of owl habitat in CHU #OR-65.
- Why did the BLM not "consult" under the ESA for populations of Rogue River Stone Crop (*sedum moranii*).
- The BLM contends that logging, yarding and hauling activities will have no effect on recreation within the Rogue National Wild and Scenic River corridor or on the two Back Country Byways within the planning area. DEIS at 4-27. No analysis or documentation is offered to support this surprising claim. Please explain how the hauling of thousands of log truck loads of timber will have no effect on recreation within the Wild and Scenic corridor and on the Back Country Byways. In direct contrast with the conclusions of the DEIS, the WA states that "Timber management has potential conflicts with recreational users, including visual impacts and timber hauling. WA at 142.
- The "economic profile" contained in the DEIS acknowledges that 25,000 visitors a year enjoy the Wild and Scenic Rogue River resulting in approximately \$13 million dollars flowing into local economies annually. DEIS 3-24. No attempt is made to examine or disclose the impacts of timber cutting, yarding and hauling on the recreation-dependent businesses in Galice, Agness, Grants Pass and Gold Beach.

44-13

- The habitat destruction proposed in the DEIS may well violate the BLM's duty to avoid pushing species towards listing under the ESA.
- The DEIS fails to disclose potential impacts of the project on a number of species of interest to both the BLM and the general public. No attempt is made to analyze or disclose impacts on many survey and manage, special status vertebrates, special status invertebrates, and neotropical migratory birds that are known or suspected in the planning area.
- The WA states that "Stand regeneration will be more difficult due to the canopy retention levels required for habitat protection measures and because of the restrictions in prescribed burning operations. Alternate treatment prescriptions should be considered that allow for habitat protection..." Rather than develop alternate treatment prescriptions, the DEIS proposes 628 acres of regeneration in critical habitat and within a regionally significant wildlife connectivity corridor.

We urge the BLM to begin the long process of rebuilding public trust in your ability to manage forests for their ecological, hydrological and recreational values. Clearly the Kelsey-Whisky planning area is a unique and irreplaceable landscape that can provide far more value to the public as an intact forest ecosystem than as yet another BLM fiber plantation.

Sincerely,



George Sexton

Conservation Director

Klamath Siskiyou Wildlands Center

July 9, 2002

BLM

Attn. Linda Boody  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

45

To Medford District Office BLM:

I am a concerned citizen writing you of the Kelsey-Whiskey timber sale. I have kept up on the logging proposal and have a few comments of my own.

I do not approve of clearcutting 1,324 acres and constructing 1.9 miles of logging roads in the Zane Grey Roadless Area and in adjacent old-growth forest. I do not believe logging this spectacular forested area will save it from fire as the BLM and The Draft Environmental Statement (DEIS) claims.

I have worked as a seasonal firefighter in the past and have observed that logging does not take the place of fire as a means of preventing hot, fast fires. If anything, logging makes the fire situation worse because fire is suppressed in favor of logging.

Regeneration cutting (clearcutting) of older forest increases fire hazard because of the debris left. Having worked out in the woods a lot, I believe it is better to have small, control burns in the spring when the area's moisture content is high. There should be no cutting of big old trees.

The DEIS acknowledges the unique habitat values of the East Fork Whiskey Creek watershed. The BLM should designate the largest proposed Area of Critical Environmental Concern (ACEC) to preserve the habitat values of the East Fork Whiskey. The East Fork Whiskey Creek is critical spotted owl habitat. Spotted owls and other wildlife, such as the Southern Oregon Coho salmon, cannot tolerate anymore habitat destruction. Because of such intolerance, by native wildlife, the East Fork Whiskey ACEC should include the full 2,844 acres.

In very much would like to see the Zane Grey Wilderness left just that, wilderness. It is an island of biodiversity in a range of monoculture logging on public land. Logging the area is only a short-term economic gain. I will point out the 10.4 miles of road decommissioning proposed in the DEIS "preferred alter native" is a good start but should be increased.

Thank you for taking the time to read my comments,



Stacy Drake  
999 NW Sycamore Ave  
Corvallis, OR 97330

1131 North Main  
Ashland, OR 97520



Bureau of Land Management  
Medford District Office  
3040 Hiddle Road  
Medford, OR 97504

Dear Lynda:

I have lived on the land by Marial since 1980. On July 3, Sherwood Tubman, Jim Brimble and I traveled to Marial to look at, assess, and come up with recommendations for the propose vegetation treatment bordering my land. My land comprises 160 acres. 120 acres in the South East quarter of section 2, T32S, R10W, and 40 acres in section 11. The proposed work designated 2-1B borders my land on two sides. The proposed work 2-3 borders the 4 acres on 3 sides and 120 acres on 1 side.

First, I want to thank you and Sherwood and Jim for taking the time and putting the energy out to come out with me to the land. Sherwood and Jim were beautiful in their openness, wisdom, compassion, and generosity of knowledge and spirit.

Some years ago, when roadwork was being done, and trees and brush were being cut, I was driving by and notice a fir burning through the forest, just north of the Marial Road and the southern border of my 120 acres parcel. I jumped out of the truck and attacked the fire with 3 fire extinguisher that I had, and then with a shovel. I pounded away at the flames for about an hour before 2 passersby saw me and stopped and together we continue another hour. A large area had been burned, thankfully we just got it under control. There was no supervising from any agency to oversee and safeguard the safety of the forest and the land. That same day, after leaving this upper bank of the road under the 120 acres, I saw that more fire had burned unattended below the road on the northern part of the eastern border of the 40 acres. I jumped down and put out the remaining areas that were still burning there. Then I drove up and down the road to see if there were any other fires that needed tending.

If the other people and I had not come along, to fight these unattended fire when we did, the fire could have spread and destroyed the habitat and lives of the whole mountain. This experience left a deep and indelible mark on my consciousness.

So, when Sherwood and Jim and I made the journey to the land on July 3, 2002 and I was told that the proposed plan for the removal of brush and small trees also entailed initial burning of piles and then further burning of larger areas a few years later, I was very concern. I am concerned first, that the burning of the piles, and worst still, the "drip line burning" of the larger areas can cause fires that will 1) run out of control 2) scar and girdle and kill some tress, according to Jim. There is a lot of old growth in the area.

I am therefore proposing an alternative plan for the fields treatment in section 2 and section 11, 2-1B on both side along my driveway, leading from the Marial Road into the 120 acres. The land is almost flat. I would very much appreciate in the interest of safety and health of the forest, propose that:

- 1) Instead of piling and burning, or just burning with drip line, the undergrowth, that instead a chipper could be brought in, and the vast majority of the brush along the driveway could be chipped and just to right back to feeding the forest, without the danger of fire destruction to the forest.
- 2) Jim Brimble, Sherwood and I saw clearly that on both side of the driveway, brush and small trees could be chipped, and further beyond the driveway in 2-1B, a chipper could be brought into the forest as an alternative to cutting and burning.

In the areas beyond where chipping is not as easy, Jim mentioned that just piling could be an alternative that could be used instead of burning. I concur with Jim. I would very much appreciate and strongly request that in 2-1B there be no burning, just cutting, chipping and piling will do the job more safely. Not only for the forest's health and safety, but also for the two homestead on the 120 acres, one on the 105 acres and one on the 15 acres could be endangered but also another homestead on another 40 acres below Big Meadow, as well as the Big Meadow homestead and my lower 40 acres could all be at risk if a fire got out of control.

In addition, there are year round waterways through this area of 2-1B. The fuel used to burn the fire can seep into the ground and destroy and pollute the waterways, poison the wild life, and flow into the wild and scenic Rouge River.

For all these reasons, I strongly recommend and request that an area 2-1B, cutting, chipping, and piling be used wherever possible. No burning.

In the proposed pine conversion of 2-3: 1) first I want to commend you on trying to convert the pine forest to a fir forest. It would have been better to plant fir trees in the first place, because they are more appropriate to the natural ecology of the mountain side. However, opening some areas to fir and other mixed growth now is a positive step. The pines suck up more water and have contributed to the demising water supply for the creeks supplying the 40 acres and the river.

The 40 acres is feed by six year round creeks. These creeks supply drinking water and irrigation water for everyone living and working on and visiting the 40 acres in section 11. There are many people who live, work, and visit the 40 acres and 120 acres and all the land around. It is of absolute utmost importance that the quality of the water not be tainted, poisoned, or destroyed by the proposed work.

Therefore, I strongly recommend and request that the areas both above the Marial Road as well as below the Marial Road not have any burning down with drip line. The drip line can leave fuel to enter into the ground water and destroy the integrity and purity of the water. Not only the wildlife, but also the drinking and irrigation water of all the people who live, work and visit the land would be effected.

It is not a necessity to use fuel to burn the debris from undergrowth that is cut. Again, cutting and piling are sufficient. The dangers, both fire and water pollution are two great. It is not necessary to get

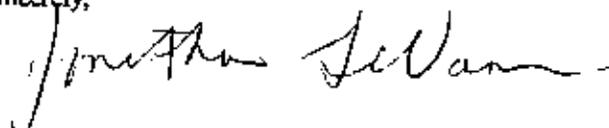
46-3

rid of A.I. undergrowth. Particularly those areas that are in drain that feed into waterways. The use of fuel to se fire should be avoided.

There are two live creeks on the lower part of the road 32-9-31 and three or more below the Marial Road and above the 40 that need to be spared the consequences of fouling and poisoning by fuel seepage into the ground water table.

Thank you very much for your concern, care, compassion, and help in protecting and administrating these lands for the good of the land and the people who live, love, work, and visit these land.

Sincerely,



Jonathan Levann  
(541) 488-4664

# ASSOCIATION OF O & C COUNTIES

COMM. DOUG ROBERTSON, PRES  
DOUGLAS COUNTY COURTHOUSE  
ROSEBURG, OREGON 97470  
(541) 440-4201

COMM. MIKE PROPES, VICE-PRES  
POLK COUNTY COURTHOUSE  
DALLAS, OREGON 97338  
(503) 623-8173

COMM. SUE KUPILLAS, SEC.-TREAS.  
JACKSON COUNTY COURTHOUSE  
MEDFORD, OREGON 97501  
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ROCKY McVAY, EXEC. DIR  
PO BOX 2327  
HARBOR, OREGON 97415  
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1201 S.W. 12TH AVENUE, SUITE 200  
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JOSEPH S. MILLER, PUB REL  
19 3RD STREET N.E.  
WASHINGTON, D.C. 20002  
(202) 546-6681

July 10, 2002

47-1

Lynda L. Boody, Field Manager  
Glendale Resource Area  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, Or. 97504

## Re: Kelsey Whiskey Draft Landscape Management Plan

Dear Ms. Boody:

As you know, the Association of O & C Counties is made up of counties in Western Oregon within which lie a special category of BLM-managed timberlands known as the Oregon and California Grant Lands ("O & C Lands"), as well as other federal timberlands. The O & C Lands are dedicated by federal law to the production of timber for the purpose of supporting local communities. The purpose of the Association of O & C Counties is to cooperate with the managing agencies in the development of policies for the management of these lands and to work with members of the Oregon Congressional Delegation in matters concerning national legislation and administration of federal laws affecting the O & C lands.

The Association believes the above noted plan fails to adequately consider the socioeconomic impacts on communities. This failure, in part, is due to the lack of monitoring social and economic changes to counties induced by the Northwest Forest Plan. The ROD for the Northwest Forest Plan requires monitoring of social and economic changes associated with federal forest management, but the managing agencies have failed to adequately comply with this requirement.

Under S2.0 Purpose and Need and S4.2 Alternative 2 (Preferred Alternative) reference is made to "a plant group [that] has been found to fill a heretofore unfilled plant cell in the Oregon Heritage Plan" and the creation of an "Area of Critical Environmental Concern to protect Tanoak/Douglas fir/ Salal/Evergreen Huckleberry plant group which is not currently under the Oregon Natural Heritage Plan." The BLM does not have statutory authority to create reserves on O & C timberlands, or otherwise limit management on the O & C timberlands, to maintain persistence of plant or animal species to the exclusion or limitation of timber production where

47-2

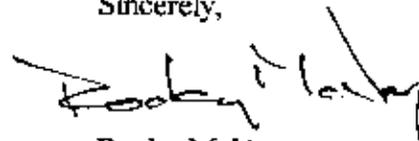
the species in question are not listed as threatened or endangered under the Endangered Species Act. The creation of temporary or permanent reserves around sites or habitat of such species to exclude or limit timber production violates the O & C Act, is an abuse of discretion and in excess of statutory authority.

Also under S2.0 Purpose and Need, the plan neglects to note that while FLPMA directs BLM to manage public domain lands on the basis of multiple use, in the event of conflict with or inconsistency between FLPMA and the O & C Act, the O & C Act shall prevail. Unlike other lands subject to management pursuant to FLPMA, the O&C Act has been judicially determined to require management of the O&C lands for the dominant use of timber production. It is legally incorrect to say that the multiple use mandate of FLPMA applies to the O&C lands.

Between 1953 and 1983 the O & C Counties voluntarily returned one-third of their statutory revenue entitlement to be plowed back into management of the O & C lands. These plow back funds have helped pay for reforestation, road construction and maintenance, campgrounds and recreational facilities and other improvements to the lands. The Association is sensitive to the issue of road decommissioning and creation of any type of temporary or permanent reserves because of the capital investments the counties made in the past. For this reason the Preferred Alternative S4.2 and Alternative S4.3 are not acceptable to the Association of O & C Counties. Alternative 1 seems to best suit the Association's policy so it is with reluctance we encourage the selection of Alternative 1 for the Kelsey Whiskey Landscape Management Plan.

Thank you for the opportunity to comment on this draft plan and we look forward to working with you on other projects on O & C and public domain lands on the Medford district.

Sincerely,



Rocky McVay  
Executive Director  
Assn. Of O & C Counties

July 9, 2002

Attn Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Rd.  
Medford, OR 97504

48

Dear Ms. Boody,

The Zane Grey roadless complex is a remarkably wild and rugged forest amid an ocean of clearcuts along the Wild & Scenic Rogue, the largest intact forested roadless area managed by BLM. This area provides irreplaceable habitat for rare species of wildlife.

Timber planners in the Glendale Resource Area are proposing to build roads and to log over a thousand acres within this roadless area and in adjacent old-growth and mature forests, an area that includes critical spotted owl habitat. They are proposing clearcutting hundreds of acres. One of the stated aims is to protect the area from wildfire, but it's clear that mature forest does much better in fires.

The Zane Grey Roadless Area should be left alone: No roads and no logging.

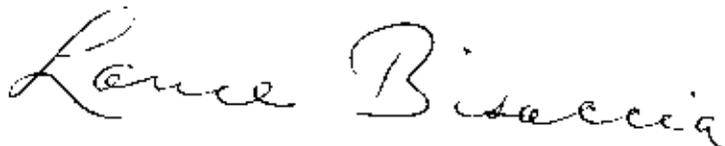
The BLM should stop logging critical spotted owl habitat.

Clearcutting of older forests increases fire hazards.

The East Fork Whisky Creek ACEC should include the full 2,844 acres.

The 10.4 miles of road decommissioning proposed in the DEIS "preferred alternative" is a good start, but should be increased.

Yours truly,



Lance Bisaccia  
PO Box 579  
Ashland, OR 97520



# SISKIYOU CHAPTER

Native Plant Society of Oregon

*Dedicated to the enjoyment, conservation, and study  
of Oregon's native vegetation*

---

9 July 2002

49

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
Attn: Lynda Boody

Re: Kelsey-Whiskey Timber Sale

I am writing on behalf the Siskiyou Chapter of the Native Plant Society of Oregon with over 100 members in southwestern Oregon. The Native Plant Society of Oregon is dedicated to the enjoyment, conservation and study of Oregon's native vegetation. We hike in the Siskiyou and wilderness areas of southern Oregon, study native plants, enjoy changing seasons, wildlife, and the remoteness.

In spite of roadless policy, destructive projects continue on federal lands in Southern Oregon. Logging on roadless areas threatens plant life, endangered fish and wildlife, recreation opportunities, and scenic values.

We strongly support preserving the Zane Grey Roadless Area, one of the largest intact roadless areas on BLM land. This area and adjacent old-growth forests provide intact habitat for numerous species of vertebrates and plant life and maintain the forest gene pool.

Old growth stands are NOT particularly susceptible to fire because of decreased understory vegetation and thicker bark and higher canopies.

We urge BLM to designate the East Fork Whiskey Creek watershed as an ACEC to preserve habitat.

Darlene Southworth, Conservation Chair  
Siskiyou Chapter, Native Plant Society of Oregon  
866 Blaine St.  
Ashland, OR 97520

July 6, 2002

ATTN: LYNDIA Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford OR 97504

(50)

Re: Comments, Kelsey-Whiskey Timber Sale

Dear Ms Boody:

This is to urge that the BLM please preserve the  
Zane Grey Roadless Area and prohibit all logging and  
all logging roads.

The wilderness habitat remaining today is desperately  
needed by our wildlife in order for wildlife to survive.  
That habitat should and must stay in pristine condition  
in order for it to provide viable living space for our  
wildlife.

The latest scientific research shows that older, roadless  
forests are most likely to experience low intensity  
burns, while young tree plantations in highly roaded  
watersheds tend to burn hot and fast.

The East Fork Whiskey Creek ACEC should include the  
full 2,844 acres. The 10.4 miles of decommissioning  
of roads proposed in the DEIS "preferred alternative" is  
a good start, but that amount should be increased.

Sincerely,

Plaine Woodruff  
717 N. McDowell Blvd., #307  
D+1 CA 94941 4150

BLM med D  
3040 Bidde Rd  
Medford Or 97534

(51)

Dear Folks

I am studently opposed to your Kelsey  
Whiskey timber sale. We need ↑ wilderness  
not ↑ logging & logging roads. Say yes to clean  
air & water, & logging = ↑ salmon  
I demand & new roads & logging esp of  
big old trees. Decommission all of old  
logging roads.

Again yes to Zone Grey W  
No to logging

Esp as a rafter who loves the Rogue R  
no clear cutting, roads or signs of humans  
please

thanks  
sincerely  
Chris Matthews  
Box 461  
O'Brien OR 97538

the  
**job**  
market

4<sup>th</sup> & K, Eureka  
409 K St., Eureka, CA 95501  
707 • 445 • 6149

(52)

July, 2002

Dear friends,  
I am writing to you on behalf of the Zone & Dry Roadless area. I am asking that this ancient forest & roadless area be left alone. Critical spotted owl habitats need to be left alone. Spotted owls, salmon & other wildlife that depend on older forests can't tolerate more habitat destruction. There have been recent scientific studies <sup>which</sup> show that older, roadless areas will most likely experience low intensity burns, while young tree plantations in highly roaded watersheds tend to burn hot and fast. Regeneration cutting of older forests increases fire hazards. So we ask that there be no logging of big old trees. The East Fork Whiskey Creek ACEC should include the full 2,844 acres. The 10.4 miles of road decommissioning proposed in the DEIS "preferred alter native" is a good start but should be increased. Please look within yourselves to understand the need for our ecology balanced to be maintained. Our few ancient forests are so few at this time. Please help us to save what little we have left.

Thank You,  
Rachel Aquino  
Rachel Aquino

July 10, 2002

53

Dear Bureau of Land Management,

We are writing you to express our strong opposition to the proposed Kelsey-Whiskey timber sale. This area includes old growth forest, and irreplaceable habitat for rare species including the northern spotted owl, Southern Oregon coho salmon, taile Frog & bald eagle, as well as the Del Norte salamander. The B.L.M.'s calling the proposed clearcutting (i.e. destruction) of 355 acres of old growth trees "regenerating" is obscene. The BLM's lame rationale for ~~not~~ needing to log to save the forest from fire is groundless based upon the latest scientific research showing that older, roadless forests are most likely to experience low intensity burns.

We implore you to leave the Lane Grey Roadless Area in its current state - no roads, no logging. The BLM should strongly consider designating the largest proposed Area of Critical Environmental Concern (A.C.E.C.) to preserve the habitat values of the East Fork Whiskey; this would mean the full 2,844 acres. This is beautiful area! It is in need of protection.

Thank you for considering our opinion about this area, & we look forward to your response.

Sincerely,  
Jimi Muller & Joan Balle  
1478 Rose Street, Berkeley, CA 94702

Dear Lynda Boody

(54)

I am writing to comment on the Kelsey-Whiskey timber sale. This timber sale must be stopped. The Zane Grey Roadless Area should be left alone, no roads and no logging. The BLM should cease logging spotted owl critical habitat. Spotted owls, salmon and other wildlife that depend on older forests can't tolerate more habitat destruction.

Clearcutting of older forests increases fire hazards. The latest scientific research shows that older, roadless forests are most likely to experience low intensity burns, while young tree plantations in highly roaded watersheds tend to burn hot and fast.

The East Fork Whiskey Creek ACEC should include the full 2,844 acres. The last point I would like to make is that the 10.4 miles of road decommissioning proposed in the DEIS "preferred alternative" is a good start but should be increased.

Thank you  
John Schaufmager  
1506 N 19th St.  
Superior WI 54880

(55)

I have read of your intention to allow clearcutting of the Zone Grey wilderness area. For God sake, there has been too much clearcutting, which is very destructive to land, forests, wild life, salmon - the list is long. Please preserve what is left! There are too few old growth trees available for spotted owl and other creature's habitat. People also need these untouched areas, psychologically and spiritually.

Phyllis Macy

**Bradley H. Boyden**  
4762 SW Martha Street, Portland, OR 97221  
Phone: 503-245-2805 Fax: 503-245-2875  
Email: *dutchhenry@aol.com*

56-1

Ms. Linda Boody  
Field Manager  
Glendale Resource Area  
The Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

July 9, 2002

Dear Linda,

We (Frank Boyden, Ian Boyden, and Bradley Boyden) would like to thank you for taking time from your busy schedule to meet us at the Dutch Henry Homestead on July 1, 2002. Please extend our thanks also to Dennis and Sherwood for their time and constructive contributions at the meeting. With this letter, we wish to both summarize the topics addressed in our meeting and express our thoughts and desires concerning the Kelsey/Whiskey Creeks EIS and proposed actions.

We commend you for the hard work and preparation of what we consider to be a thorough, well thought, and constructive Environmental Impact Statement outlining the four alternatives in proposal for management of these adjacent large tributary drainages of the Rogue River in the vicinity of our property. It is evident that the BLM is making a concerted effort to take many factors and issues into consideration when charged with responsible management of these areas. We are most impressed with the sensitivity expressed with regard to resource, wildlife, and systems issues, primarily from an ecological perspective. We approve the proposed measures relating to wildfire suppression and fuels reduction in the area, and we will support the government in this capacity regardless of which alternate proposal is implemented. We recognize the real need for this sort of resource management, and we are aware, to some extent, of the impact of proposed action and also the inherent risks of serious, catastrophic wildfires should no action be taken.

Obviously, our greatest concern rests with the immediate impact that the understory burn, proposed in all three "action" alternatives, adjacent to our property along its entire northern boundary and east of the road which connects our property to the Dutch Henry Road (BLM Road #32-7-19.3), will have on a variety of factors associated with our property, the road itself, and most importantly, on the Wilderness Writing Residency program which we have in place on our property. Our concerns may be summarized as follows:

1. It is our hope that the proposed burn will not significantly compromise the principles upon which the Wilderness Writing Residency has been founded and is presently being conducted: that the resident (if present on the property at the time of the proposed burn) will not be placed in any danger, that the resident's "wilderness" experience along with advertised and needed "solitude" will not be significantly compromised, and that the action will not significantly impact the quality of the experience that the writer (and future writers) has (have) been assured.
2. We are very concerned about the possibility that the proposed burn could get out of control and destroy our property, its infrastructure, its present beauty, and the writer's program which we have worked very hard to establish. Related to this issue for us is the fact that we are not presently able

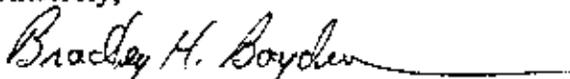
- to acquire fire insurance or coverage of any sort (at reasonable cost) for our property, and we would expect the government to assume full responsibility for complete recovery at full current (replacement level) value for any and all Dutch Henry Homestead infrastructure which might be damaged or destroyed as a result of the proposed understory burn getting out of control.
3. We are deeply concerned about the impact of the activity associated with the burn on the 2-mile section of road which connects our property to BLM Road #32-7-19.3. It is this section of the road which we have maintained as a condition of our Scenic Easement. In addition to the routine maintenance as required by the Scenic Easement, we have gone to considerable expense to significantly improve that section of the road with the addition of approximately one mile of rock. (It was noted in the meeting that we were not particularly happy about having to pay the government for permits to transport the rock over government roads in order to improve a government road!) We would expect that the government would make a responsible effort to return that section of road to its present (if not better than present), excellent condition following the burn activity. In addition (and as an aside), we would like the BLM to place the Dutch Henry Road (BLM Road #32-7-19.3) between its junction with the Whiskey Creek Road (BLM Road #33-8-26) and the point at which our road joins the Dutch Henry Road on a more regular and up-graded maintenance schedule.
  4. It was noted, in response to many of our questions, that a document, with full detail describing the extent, extant, and impact of all burn methods, logistics, proposed dates, size of crew, crew needs, equipment, recovery, etc. would be written regarding this burn in particular and made available to us well in advance of the proposed burn. "Full Details to Follow!" In regard to this aspect, we offer our property (to whatever extent possible given the terrain and needs) to be made available as a staging area for crew and equipment on the condition that all proper procedure for sanitation, clean-up, and impact, etc. be exercised. In essence, we recognize the "inevitability" that this "burn" will occur (we would, however, like to discuss alternative methods if any are possible), and we would like to offer our full cooperation.
  5. A related issue for us, applying to the period during which the burn is to occur, as well as at all other times, is the concern we have repeatedly expressed regarding unauthorized trespass on our property by government officials. The latest incidents involving the 'Mollusk Study' scientists are a case in point. At all times, we fully expect any government official wishing to enter our property to provide us sufficient and timely notification of intended visit(s), and this must include all pertinent information regarding the identity of the visitor(s), the date(s) of intended visit(s), the purpose(s) of the visit(s), and if possible, the license plate number(s) of the vehicle(s) used by the visitor(s). Unfortunately, past events have led us to our present stance on this issue. We need to make it abundantly clear that we are (on an annual basis) host to guest writers on our property, and that these people may be male or female, young or old, in residence as single individuals or as couples, and that they must never be placed in a position of fear or authority in having to contend with government officials who have not followed correct and required protocol to acquire permission to enter our property. This is a great concern for us. We do not wish this in any way to deter government officials from using our property for a variety of purposes including scientific study, river or area access, and/or for fire prevention or management. We are and have been in full support of scientific research by government officials in this area in the past. We have also been in full support of entry by other government officials at other times for other purposes as well.
  6. We are somewhat concerned but mostly interested in the relationship (if any) between the proposed understory burn and the BLM Scenic Easement Agreement associated with our property. We urge you to familiarize yourself with this document and identify any ramifications or connections associated with the proposed actions in the area including the proposed understory burn adjacent to our property. In addition, we are very interested to learn about the availability of government assistance through grants for management of fuels on our property. Please send us appropriate

information regarding this opportunity. We would be very interested in coordinating (in time or method) fuels management activity (through government assistance) on our property with the proposed burn.

- 7. We are extremely interested in Alternate Proposal #4 in which it is proposed that a government gate be placed across BLM Road #32-7-19.3 (Dutch Henry Road) on our side of and close to its junction with BLM Road #33-8-26 (Whiskey Creek Road). While we understand that such a gate would inherently limit public access to the areas between this proposed gate and our immediate area (some 7 miles or so of BLM Road #32-7-19.3) for multiple use purposes, we have had and continue to have serious concerns about public access to this area. Present public access to the immediate areas in proximity to our property greatly increases risks associated with fire potential in the area, as well as trespass on our property (with attendant possibility of vandalism, crime, and danger to residents and ourselves). As you are aware, open fire pits with associated trash are visible at various points along the road, and recent activities associated with crime (abandoned and burned-out vehicle; marijuana garden and federal intervention in immediate proximity to our property) have occurred, all within the proposed closed section. We have proposed (in past conversations with David Reed) just such a gate as a solution to the attendant problems and risks, and we would applaud and support this particular aspect of Alternate Proposal #4. We are interested in the reasoning from your (the government's) perspective which led to the placement of a proposed gate at a specific location across BLM Road #32-7-19.3 as identified in Alternate Proposal #4. In addition, should any of the other proposed alternatives be implemented, we would like to see a gate (placed in the same location as proposed in Alternate Proposal #4 across BLM Road #32-7-19.3) added to these other proposed alternatives for the reasons we have identified above. In other words, we are greatly in favor of the placement of a government gate (with multiple lock system) across BLM Road #32-7-19.3 on our side of its junction with BLM Road #33-8-26, regardless of which Alternate Proposal is accepted and implemented.
- 8. We are aware that the fuels management, fire suppression, timber harvest, and habitat augmentation activities proposed for our immediate vicinity (along BLM Road #32-7-19.3 between its junction with BLM Road #33-8-26 and our road) will have short-term negative impacts with regard to the beauty of the area and that the proposed actions will bring significant activity in the form of operations, people, crews, machinery, etc. to the area, thus compromising the short-term 'wilderness' status of the area. We are also aware that the longer-term effects of the proposed actions will include an improvement of wildlife habitat and ecosystem health along with reduced risks associated with the potential for catastrophic wildfires. We believe these longer-term, positive benefits greatly outweigh the short-term, negative impacts, and therefore, we are in support of any of the proposed alternatives. In fact, we are in favor of the government taking a more proactive systems approach (in general) to the management of these areas now and into the deep future, therefore, we would prefer any of the three 'action' proposals (#s 1, 2, and 4) over the 'no action' proposal (#3).

We wish for you to enter this letter into the formal record as our official response to the proposed management plan for the Kelsey/Whiskey Creeks area draft EIS as prepared by the BLM. Thank you for your consideration of these matters as they pertain to our interests as property owners within the designated area.

Sincerely,



Bradley H. Boyden (for Frank Boyden and Ian Boyden)

Copies to: Frank D. Boyden, Ian H. Boyden, Margery D. Boyden

1650C Kellenbeck Avenue  
Grants Pass, OR 97527

July 8, 2002

57

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

Dear Lynda Boody.

I am writing to in regard to the Kelsey-Whisky timber sale that threatens to clear-cut ancient forests and punch logging roads into the pristine Zane Grey roadless area. This area is home to the rare species such as the Northern Spotted Owl, Fisher, Southern Oregon Coho salmon, bald eagle, Tailed frog, Del Norte salamander and Northwestern pond turtle. Wildlife depends on the older forests and cannot tolerate more habitat destruction. No roads or logging should be allowed in the Zane Grey roadless area. Regeneration cutting of older forests increases fire hazards. The East Fork Whisky Creek ACEC should include the full 2844 acres. Also the 10.4 miles of road decommissioning proposed in the DEIS "preferred alternative" is a good start, but should be increased to 13.8 miles.

Please protect the Zane Grey roadless area from logging for all the reasons listed above. Thank you for your time.

Sincerely,

*Vasiliki P. Kelly*

Vasiliki P. Kelly

*Paul L. Kelly, Jr.*

Paul L. Kelly, Jr.

July 6, 2002

Attention: Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

58-1

RE: Kelsey-Whiskey timber sale and Zane Grey roadless area

Dear Ms. Boody:

Please reconsider plans to liquidate forests in the irreplaceable Zane Grey roadless area by logging the Kelsey-Whiskey timber sale.

For one thing, now is a bad time profit-wise to sell logs, but to consider deleting precious, never-to-be-recovered ancient forest during times of depressed log prices is unconscionable.

Once again, we ask you to stop cutting old growth and mature native forests. Please make no more new tree plantations. We must do with what we already have.

We are looking at a great increase in population very soon. Water will be a large issue very soon, if not already in your community and ours. Over-logging forests is counter productive. Not only are we willing to sell off the last, but while we remove it, we increase landslide danger and the desertification of Oregon by removing oxygen producing forests.

Times have changed. New demands on our resources require adaptation and creativity. We want you to no longer use clearcutting methods by any name. Instead, use thinning methods to conserve the last of our treasure and protect stream banks. Please quit managing our water sources so shortsightedly. We appreciate the good you try to do, but your main goal is clear. And that goal is obvious and clearly stated, you are here not to manage the lands for the general population and scientifically sound forest health principles, but for the few who profit from timber disposal.

We object to the cavalier treatment of our headwaters and aquifers. We are wasting finite resources while spreading noxious weeds. What a trade-off! No thanks. And please here don't mention the use of herbicides to quell the spread of invasive species. Herbicides and pesticides are the other reasons most rivers and streams in Oregon are degraded and being further degraded throughout the Northwest.

We should also refrain from any further logging in spotted owl critical habitat. At the fast rate of denuding that has been occurring due to both private and government practices, whole groups of species will soon be wiped out that we know very little about. We do commend you for road decommissioning that is also a part of this project and ask that you consider closing a few more.

The Kelsey-Whiskey timber sale logs very near to the Wild and Scenic portion of the Rogue River. It is one of our family's very favorite places in the world. We love floating down the Rogue through the Wild and Scenic section and up farther.

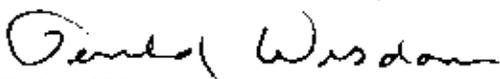
The Rogue already has other problems and does not need further insult. We are aware of the problematic Almeda mine which is right across from one of our family's favorite campgrounds, the Almeda campground. We are very much in favor of the mine's clean up as it is oozing this very minute and deteriorating the very beautiful river on which so much life depends on for its survival. Not only do fish and other aquatic life flourish here, but birds, foxes and other wildlife, and so do people. The people, who live in and around Galice and from as far away as Grants Pass, drive to work in Galice and in the recreation business. While we're eliminating trees, we're also eliminating the very resources that will be predictably scarce in the future: drinkable water and flourishing ecosystems. While we eliminate habitat there also goes jobs and once attractive places to live and recreate.

We live in Roseburg but often come down to float on the Rogue in our non-motorized drift boat. It is truly a beautiful and wondrous place, a virtual wildlife extravaganza all on its very own with some help and hindrance from people. Let us find ways to be helpful to the River and its health and not make decisions that hinder restoration and increased numbers of fish for the increasing numbers of people who are flocking here to enjoy sublimely beautiful southern Oregon.

Our water is our gold mine of today and tomorrow.

Thank you for taking the time to read these comments and to consider them seriously.

Sincerely,



Gerald & Robin Wisdom  
1260 Arcadia Drive  
Roseburg, Oregon 97470  
541-672-6982



OREGON CHAPTER SIERRA CLUB

Subject: Comments for Kelsey Whisky timber sale.  
7-4-02

Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

59

With all the hype surrounding the fires in our National Forests, I think it is very important to remember that scientific studies have proven that roadless, mature and old-growth forests are more fire-resistant than forests that have been logged, roaded and "managed."

As you are well aware, the Zane Grey Roadless Area is the largest roadless area in the nation on Bureau of Land Management (BLM) lands. It is a beautiful, wild forest haven for rare and endangered species surrounded by a sea of clearcuts. The proposed "Kelsey Whisky" timber sale would log 1,324 acres of forest along the Wild and Scenic Rogue River, punch roads into roadless areas, and regeneration log (aka clear-cut) 355 acres of mature and old-growth forest.

Logging this area will only increase the chances of fire!

Please consider the following:

- \* The Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!
- \* The Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!
- \* The East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres
- \* The logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

**Please cancel the Kelsey Whisky timber sale and please keep me up to date on all decisions made regarding this sale and the Zane Grey Roadless Area.**

Sincerely,

Donald Fortenot  
Chair, Tillamook Committee  
Oregon Chapter Sierra Club  
2230 SE Oak St.  
Portland, Or. 97214-1636  
503-232-0272  
[wildflag@msn.com](mailto:wildflag@msn.com)  
[www.TillamookRainforest.com](http://www.TillamookRainforest.com)

# McKENZIE FLYFISHERS

(60)



P.O. BOX 10865 • EUGENE, OREGON 97440-2865

July 5, 2002

TO ENCOURAGE FLYFISHING  
AS A METHOD OF ANGLING

Lynda Boody  
Bureau of Land Management  
Medford Office  
3040 Biddle Road  
Medford, OR 97504

Dear Ms. Boody:

On behalf of The McKenzie Flyfishers, a fishing and conservation organization of approximately 140 members in the Eugene-Springfield area, I write urging the protection of the Zane Grey roadless area along the Rogue from roadbuilding and logging.

Many years ago, Zane Grey wrote a famous and prophetic defense of the Rogue, one of his favorite fishing rivers in the entire world, from logging, degradation and development. He rightly saw the river and its watershed as a priceless resource. The Zane Grey area should be left alone to protect the spotted owl and other rare species habitat and the water quality upon which the river's coho and other salmon, as well as its trout and steelhead, depend. The Rogue is, and has long been, one of our favorite fishing rivers. It needs and deserves the highest level of protection for its recreational, environmental, and fisheries values.

We urge no roads and no logging as the right response to the proposed Kelsey-Whiskey timber sale.

Sincerely,

Glen A. Love  
Conservation Co-chair  
McKenzie Flyfishers

To Linda Boody,

(4-1)

Hello,

I am writing this letter in regards to the Zone Grey Roadless area.

Specifically I am extremely concerned with a proposal to log commercially with the proposed kelsey - whisky timber sale. I am adamantly opposed to it.

If you haven't taken a drive up one of the many BLM roads lately, you might not realize that there are damn few places you can't drive to. Call me old fashioned, but as a long time resident of Southern Oregon, I've seen far too many Roadless areas become clearcuts and Roads. I could list on and on the myriad of Reasons to leave this land alone, but I'm sure you already know them.

I just want to say that it's mighty nice to drink from a creek or spring, and to know that upstream is good old forest, untrammled and left to God's



057104145

Handwritten vertical text on the left margin, possibly a date or reference number.

61-2

hand, not a log bucket or sawyers,  
nor the blade of of a Bulldozer.

There are plenty of old cuts that  
need fire & reduction work far more  
than an old growth forest.

Cut the guise. Get Tuttle!

Old Growth forests are worth  
far more than any money you or  
friends of yours might make.

The answer does not lie with  
more habitat fragments, clearcuts, roads,  
chemicals and slash.

Healthy lands with healthy flora  
and fauna, clean water. Clean air  
these are far more important.

How will Spotted owls live?

What about critical herps?

The Logging mentality got us into  
the mess we're in. It's not going  
to get us out. No Timber Sales!  
No Roads! No More Big Trees! (to cut).

C. G. Williams  
Apple gate  
Congressman Rep. Ed. ...  
Sincerely

Olive Miller  
Olive Miller

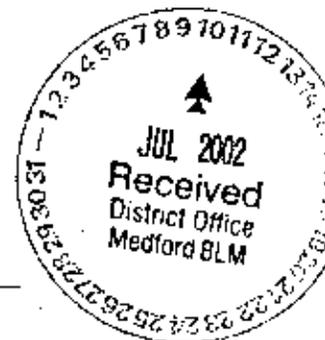
FAX

To: Sherwood Tubman  
CC: Representative DeFazio  
Fax Number: 541-618-2400  
Business: Medford BLM

62

From: Joanne Vinton  
Date: July 10, 2002  
Total No. of Pages: 1

Re: KELSEY WHISKY DRAFT LANDSCAPE MANAGEMENT PLAN



Dear M. Tubman,

The Kelsey Whisky area includes the Zane Grey roadless area, which lies on the periphery of the designated Wild and Scenic Rogue River for 26 miles. The Zane Grey is also contiguous with the Wild and Scenic Rogue Wilderness Area to the northwest.

The Zane Grey has important wilderness values:

- It acts as a link from inland habitat to coastal habitat.
- It contains waterfalls, pools, talus slopes, a rare stoncrop, northern spotted owls, northern bald eagles, osprey, cougars, bears, and Roosevelt elk.
- It is an important area for migrating anadromous fish.
- It is a prized recreational area.

An editorial in the Mail Tribune states:

The lower Rogue turns brown with sediment after a big rainstorm, while the Illinois, which flows through roadless areas, remains comparatively clear. Designating the Zane Grey Wilderness would protect the Rogue from further degradation, and help efforts to restore fish runs.

Your landscape management plan should set aside the ZG for complete protection.

The preferred alternative #2 would degrade the forest too much. Of the action alternatives, #4 seems to be the least harmful for the following reasons:

- Designates the largest number of ACEC acres for the East Fork Whiskey Creek subwatershed
- Closes the most miles of road
- Includes NO clearcutting (regen harvest)

Sincerely,

Joanne Vinton

Joanne Vinton  
805 Berntzen Road  
Eugene, OR 97402  
541-684-0059

P.S. Congressman DeFazio, please work to protect the Zane Grey Roadless Area as wilderness.

6/6/02

(43)

Linda Boody  
Bureau of Land Management  
3040 Biddle Road  
Medford, OR 97504

Dear Mr. Boody,

I am writing to express my support for designation of the Jane Grey Roadless Area as a Wilderness Area and to ask for a No Action Alternative decision on the proposed Kelsey Whiskey timber sale.

Thank you for considering my opinions.

Yours truly,  
James Bender  
(JAMES BENDER)  
10192 KESTREL ROAD  
KLAMATH FALLS, OR 97601-8652

July 3, 2002

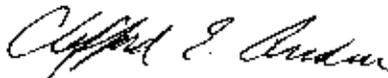
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
Attn: Lynda Boody  
Re: Kelsey-Whisky Timber Sale

64

Dear Ms. Boody,

I am writing to object to the proposed timber sale in the Kelsey-Whiskey area. Although I live in California, I do hike in Oregon and have some familiarity with the area. The proposed sale would remove some ancient-growth trees, damage spotted owl habitat, increase fire hazard, and encroach on the Zane Grey roadless area. We owe it to future generations to save this kind of country for them; there is precious little of it left.

Sincerely,



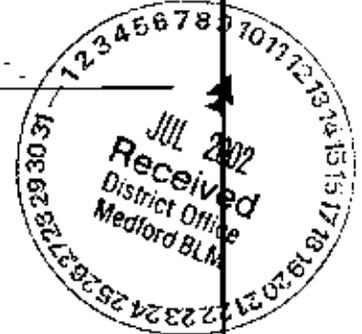
Clifford E. Anderson  
1408 La Sierra Dr.  
Sacramento, CA 95864

## Gary & Christine Pellett

2550 Old Military Rd., Central Point, Oregon 97502 USA  
 Tel. 541 772 9153 Fax: 541 245 0503 Email: gary@pellett.com

To: Ms. Lynda Boody,  
 Bureau of Land Management  
 Medford District Office  
 3040 Biddle Road  
 Medford, OR 97504

(65)



Date: July 9, 2002

Fax number: 618-2400

Pages (including cover): 1

**Re: Ancient Forests and Roadless Areas of Wild Rogue River Targeted by BLM.**

Dear Ms. Boody,

I manage a small business here in S. Oregon and my wife and all my friends spend a considerable time outdoors. Specifically, we raft the lower Rogue River with groups 2 - 3 times per year. The proposed area is adjacent to the lovely Wild and Scenic Section of the Rogue!! We have hiked up the Kelsey Creek a number of times.

To our surprise and horror, we just learned that logging is planned within the Zane Grey Roadless Area and in adjacent old-growth and mature forests along the Rogue River.

It is contended that we must log the forest in order to save it. However, the latest scientific research shows that during fires, older roadless forests are most likely to experience low intensity burns, while young tree plantations in highly roaded watersheds tend to burn hot and fast.

While these proposed activities will be detrimental to the Wild Rogue, the DEIS acknowledged the unique habitat values of the East Fork Whisky Creek sub-watershed. We encourage the BLM to designate the largest proposed section an Area of Critical Environmental Concern (ACEC) to preserve these habitat values.

- **The Zane Grey roadless area should be left alone -- no roads, no logging!!**
- The BLM should cease logging Northern Spotted Owl Critical Habitat. Wildlife that depend on older forests can't tolerate more habitat destruction.
- **Regeneration cutting of older forests increases fire hazards, especially in Southern Oregon.** No logging of big, ancient trees.
- The East Fork Whisky Creek ACEC Ancient Forests should include the full 2,844 acres.
- The 10.4 miles of road decommissioning proposed in the DEIS "preferred alternative" is a good start but should be increased to 13.8 miles.
- The Zane Grey Roadless Area should be preserved as Wilderness.

Thank you for your cooperation.

Sincerely, Gary and Chris Pellett

7/1/2002

To Whom It May Concern,

(bb)

I am writing to urge, insist that the  
Zanebry Roadless Area should be left alone.

NO ROADS and NO Logging

Logging spotted owl habitat should cease.  
Older forests can not tolerate further destruction this  
vital area which is so critical to dependant wildlife.

Regeneration cutting (A.K.A. clearcutting) of older  
forests increases fire hazards.

NO LOGGING of big old trees PLEASE

The 10.4 miles of road decommissioning proposed  
in the DOI's "preferred alternative" is a good start  
but lets increase it!

The East Fork Whiskey Creek AEC should include  
the full 2844 acres.

Let's leave this heritage for future generations

Patricia Kuen

C. SMITH  
P.O. Box 3302  
Jacksonville, OR 97530

DATE 7-6-82

(541) 846-1300 Phone/Fax

TO

Bureau of Land Management  
Medford District Office

SUBJECT

(19)

Do NOT ALLOW ROADS OR Clear cuts in the zone

Strip roadless area.

You are interested with the management of "Ours"  
land. You know that clear cuts change for ever the  
ecology of the area, the fir and pines never return, river  
water supplies are affected as well as the beauty and  
wildlife all so some timber company can have profit  
from Gageys land.

SIGNED

Cecil Smith

PLEASE REPLY

NO REPLY NECESSARY

7-4-02

Dear People at BLM, (68)

I would like to ask you not go thru with the proposed Kelsey - Wiskey timber sale.

The Lane Grey roadless area belongs to us all and is a national treasure.

Please do not build any roads and please do not do any logging in that area.

Logging Old Growth forests creates fire hazards and destroys critical habitat for spotted owls and Salmon.

The east fork Wiskey creek ~~area~~ <sup>ACEC</sup> should include the full 2,844 acres.

Please also decommission more than the 10.4 miles of road that is proposed.

Thank you for your time on this matter.

Sincerely, Mark R. Furler

MARK R. FURLER

97305 SIGNAL BUTTE TRAIL, GOLD BEACH OR. 97444

P. O. Box 1471  
Port Orford, Oregon 97465  
July 3, 2002

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, Oregon 97504

69

Attn: Lynda Boody

Dear Ms. Boody:

The Kelsey-Whisky timber sale on the Rogue River must not happen. The wild Rogue River and its environs is a treasure. We need to preserve the large forested roadless area of the Zane Grey region for people of the present, the animals, birds and fish which call it home and the people and wild creatures of the future.

The Zane Grey Roadless Area should be left alone, with no roads and no logging.

The BLM should cease logging spotted owl critical habitat. Salmon are also affected by logging.

Logging roads contribute to water runoff and other erosion. Present unused roads should be decommissioned and no more roads built in this area.

Please consider the irreplaceable benefits of this forest.

Yes, I do hike and have hiked the Rogue from Grave Creek to Foster Bar. Even if I never go there again, I want to know that some wilderness is there for the wild creatures and the humans who need it—as wilderness.

Very truly yours,

*Shirley Nelson*  
Shirley Nelson

Dear Ms. Boody,

July 3, '02

It is my understanding that the BLM (Meaford) is planning to log within the Zane Grey Roadless Area - a forest of 46,646 acres in the largest forested roadless area under BLM management in the U.S.

THE PLAN CALLS FOR logging 1324 acres, build 1.9 miles of roads, clearcut 355 acres of old growth + degrade 1259 acres of Spotted Owl habitat - designated as "critical" by USF+WS.

BLM, apparently, wants to log this ecologically important area for fire control. Why not a controlled burn? Also, research shows that older, roadless forests are most likely to have "cool" burns than young tree plantations in highly roaded watersheds.

The DEIS sites the "unique habitat values" of the East Fork Whiskey Creek watershed. I urge you to designate the largest proposed ACEC for E. Fork Whiskey. (22,444 acres)

Sincerely, Charles Steadman

30

July 1, 2002

Randall E Hartman  
21718 Marjorie Ave.  
Torrance, CA

(71)

Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

RE: Kelsey-Whisky Timber Sale

Dear Ms Boody:

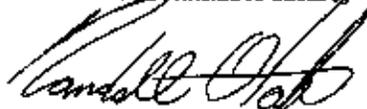
I strongly believe that the BLM is wrong in its assertion that this timber needs to be cut in order to save it from fire. That is ludicrous. I cannot agree to the logging of any ancient forest in this area, or logging in roadless areas. Scientific research, and even common sense shows that older roadless forest are most likely to experience low intensity burns, while young tree plantations or areas previously cut tend to burn hot and fast. There is less than 5% of ancient forest left in this country and we should save every last tree.

The Zane Grey roadless area is a beautiful and precious resource that should be saved for future generations to enjoy, including the endangered species and other animals that call it home and are dependent upon it as it is, for their existence. It would be a grave mistake to log this area.

I hope your agency will do the following:

- Do not allow any logging of large, old trees. Clearcutting of older forest increases fire hazards
- The BLM should cease logging in spotted owl critical habitat.
- The Zane Grey Roadless Area should be left alone....No Roads, and NO Logging!
- Include the full 2844 acres in the East Fork Wisky Creek ACEC.
- The 10.4 mi of road decommissioning proposed in the DEIS "preferred alternative" is a good start but should be increased.

Yours for a sustainable future,



Randall E Hartman

(72-1)

Lynda Beedy  
Bureau of Land Management  
3040 Biddle Road  
Medford, OR 97504

July 6, 2002

Dear Ms. Beedy,

I am opposed to the Kelsey-Whiskey timber sale in the Zane Grey roadless area adjacent to the Wild Rogue Wilderness. My reasons are several:

- 1) The Zane Grey roadless complex provides irreplaceable habitat for rare species such as the Northern Spotted Owl, Fisher, Southern Oregon coho salmon, bald eagle, tailed frog, Sel Norte salamanders, and Northwestern pond turtle.
- 2) The DEIS calls for clearcutting 355 acres of old forest and degrading 1,259 acres of Northern Spotted Owl habitat that has been designated "critical" by the U.S. Fish and Wildlife Service. (over)

72-2

375

3) Scientific research shows that during fires older roadless forests are most likely to experience low-intensity burns while young tree plantations in highly roaded watersheds tend to burn hot and fast.

Rather than log this area, the BLM should designate it an Area of Critical Environmental Concern.

Thank you!

Yours truly,

James Bender

10192 KESTREL RD.  
KLAMATH FALLS, OR 97601-8652

July 2, 2002

Dear Lynda Beedy,

73  
Please drop any plans to log in the roadless area adjacent to the Wild Rogue wilderness. The Zone Gray roadless area is wilderness still - biologically speaking - though not yet Wilderness - legally speaking. This East Fork Whiskey Creek watershed should be designated an Area of Critical Environmental Concern.

Clearcutting does not protect a forest from fires, it destroys it. There are plenty of over-crowded 2<sup>nd</sup> growth trees that need intelligent thinning - Not old growth forests!

Sincerely, Phyllis Kirk

July 3, 2002

f

BLM  
3040 Biddle Road  
Medford, OR 97504

74

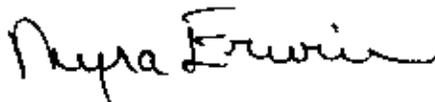
Subject: Kelsey-Whiskey Cr. Project Area DEIS

We are strongly opposed to timber sales in this area of the forest.

The Zane Grey area, in particular, has been recognized for many years as a prime candidate for preservation. It should remain roadless to protect its Old Growth, its wildlife habitat and the water quality of its streams that feed the Rogue River.

We do support small diameter thinning where it would reduce fire danger. However, access should not be by road!

Sincerely,



Myra Erwin  
300 Grandview Dr.  
Ashland, OR 97520

7/4/02

To Whom It May concern,

75

I am against the proposed logging in the Zane Grey Roadless Area and along the Wild and Scenic Rogue River.

We need to keep mature forest in there natural state as much as possible

We need to protect these treasure for future generations.

It has been proven that old growth timber is more likely to survive a forest fire than a degraded forest because the degraded forest fire burns hotter and therefore is more likely to kill the trees.

Please let's protect our remaining roadless areas.

Sincerely,

Deborah Newell

Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

Diana Huntington  
87426 Halderson Road  
Eugene, OR 97402

76

July 2, 2002

Dear Ms. Boody:

I am writing regarding the massive Kelsey-Whisky timber sale which threatens to clearcut our ancient forests, as well as putting roads through the Zane Grey roadless area adjacent to the Wild Rogue Wilderness. As I have read about this plan, I am, once again, astounded, saddened and outraged by the actions of the BLM.

The Zane Grey Roadless Area should be left alone -- period. No roads. No logging. The BLM should absolutely cease logging spotted owl critical habitat -- period. Wildlife dependent on older forests have had enough. Leave them alone, for God's sake. No more big, old trees should be logged -- period. Must you sell the last of our forests? The East Fork of Whiskey Creek ACEC must include the full 2,844 acres. Proposed road decommissioning must be increased.

Please add my letter to your public comments.

Sincerely,



Diana Huntington

Peter Zedlis  
115-14 22054  
Jamaica, N.Y. 11411

7/2/02

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

(7)

Dear Ms Lynda Boady, BLM.

The Zane Grey roadless area should not be logged. The Zane Grey roadless area is the largest roadless area managed by the BLM. Hundreds of thousands of Americans have urged the U.S. Forest Service to leave the roadless areas of our nation's forests unroaded and unlogged.

Regeneration cutting of older forests increases fire hazards. The Zane Grey roadless area is a remarkably wild and rugged forest amid an area of clearcuts along the Rogue River. The old-growth and mature forest of the Zane Grey area and East Fork Whiskey Creek watershed are important wildlife habitat for spotted owls and salmon, bald eagles and fisher.

I commend the BLM for the decommissioning of roads in the DEIS. The clearcutting in the Zane Grey roadless area will not decrease the fire hazards.

I urge you to leave the Zane Grey roadless area alone, please no roads, no logging in the roadless area.

Sincerely, P. Zedlis

July 1st, 2002

To whom it Concerns: (18)

And that would be you of the  
B.L.M. WAKE-up, Quit Trying to  
sell us all out. ITS just sick the  
way TAX payer's have to put up with  
the likes of all the greedy bastards  
out there - that won't be content  
until every living thing has been betrayed.  
Leave us our connections to beauty - its  
our hope, and dream, that the Earth  
Understand our love and respect; for  
our feeding off of her. Shame on anyone  
that participates in tearing down what's  
left of the Ancient ones. They can stand  
in fires - only NOT the kind of fire the  
greedy man bastards make. Leave the Zone  
Grey Roadless area's alone. No Road - No  
Logging. Whats so hard to understand?  
Surely if you have a heart (well don't  
ya?) you don't need LOG-istic's, to  
tell you different. Be REAL, let God know  
you appreciate this GARDEN. This GARDEN,  
the Ancients, must be free, to produce  
the strains of Pristine, without which  
we might as well blow up. I pray for you

To do Right,

M.L. Chris Fielding

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
Attn: Lynda Boody

Corrie Watterson  
709 E. Aloha St, Apt 9  
Seattle, WA 98102

79

Re: Public Comment on Kelsey-Whisky Timber Sale

Dear Ms. Boody:

I am writing to express my support for preserving the Zane Grey Roadless Area. Roads and logging will despoil this Oregon treasure, which I have enjoyed visiting during my vacations to the area. I specifically seek out these types of majestic and irreplaceable (at least within the next many generations) old growth forests for my trips. Below are some of my reasons for encouraging the BLM to keep the Zane Grey Roadless Area and the Rogue River wild.

- The area is a pristine, intact roadless area with unique habitat, as acknowledged in the DEIS conducted for this timber sale. Rare species such as the spotted owl, Southern Oregon coho salmon, and bald eagle call it home. Once it is roaded and logged, their numbers will decrease even further.
- Clearcutting of old growth forests increases fire hazards, not decreases them. Young tree plantations in highly roaded areas are more likely to burn hot and fast than established ecosystems.
- The Zane Grey area is the largest intact roadless forest in the country. This should be a fact that the BLM is proud of, and advertises to tourists and nature enthusiasts... not a 'red flag' that not enough logging has occurred.

So please, keep logging confined to new growth forests and leave intact the last remnants of our region's spectacular natural heritage. Preserve the Zane Grey Roadless Area.

Sincerely,



Corrie Watterson

90-1

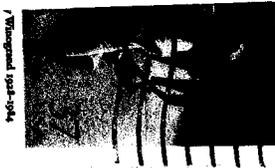
1915 E. Spruce St #C  
Seattle, WA 98122  
July 2, 2002

BLM  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
Attn: Lynda Boody

Dear Ms. Boody,

I am writing with concern about the Kelsey-Whiskey timber sale. I have heard that it threatens to cut ancient trees and old growth habitat, which I and many others think is ill-advised.

I hope you will work to keep the "Zane Grey" Roadless Area preserved from roads or logging. Research seems to show that older forests are less vulnerable to fire than newer, clearcut-regenerated ones. The DEIS acknowledges the unique habitat of the East Fork Whiskey Creek watershed, and the Area of Critical Concern should include the full



80-2

2,844 acres.

I look forward to visiting  
an Oregon that has done its utmost  
to preserve its irreplaceable natural  
heritage. Thank you for your  
time and help.

Sincerely,

Robert Adams

July 4<sup>th</sup>, 2002

BLM

Medford District Office

3040 Biddle Road

Medford OR 97504

(81)

Attn: Lynda T. Boody.

Hi'am,

The massive Kelany-Whiskey timber sale, proposed by the BLM, threatens to clearcut ancient forests & punch logging roads into the pristine zone Grey roadless area. This area should be left ~~and~~ alone, as it is critical spotted owl habitat. The owls, salmon, & other wildlife that depend on older forests can't tolerate more habitat destruction.

Studies show that forests with roads cut into them suffer more fire damage than do older forests with no roads. This is a very poorly thought out timber sale. We encourage the BLM to designate the largest proposed Area of Critical Environmental Concern to preserve the habitat values of the East Fork Whiskey.

Sincerely,

Mr. & Mrs. Stephen L. Graves

49672 N. Bank Chetco Rd.

Brookings OR 97415

Bum

82

Medford District Office  
3670 Bidlee Road  
Medford OR 97504

Attn: Lynda Beady

Dear Mrs. Beady,

I am writing to oppose the Kelsey - Whiskey  
timber sale.

The Howe Gray roadless area should  
be left as it is - no roads should be  
built through it and no commercial  
logging should be done in it.

I do not support logging in spotted  
owl habitat.

We should not be clearcutting nor  
logging old growth trees.

Sincerely,

Ray Peagan  
41505 Signal Butte Trail  
Gold Beach OR 97444

Bureau of Land Management 7/1/02  
Medford District Office  
Attn: Lynda Boody. (83)

Dear Ms. Boody.

I cannot say enough against logging or road building in the Zane Grey roadless area.

Every year for the last 20 years I have hiked this area. I see both creeks as vital to the Rogue River and salmon stocks. The water as it runs into the main Rogue is abundant and cold, Kelsey seems much colder than most on the Rogue River trail.

Please I cannot express my strong feelings enough against any logging or road building. These last few areas should be protected.

Sincerely

Charlie Vincent.

56123 Lee Valley Rd  
97423 Coquille OR

June 28, 2002

Bureau of Land Mgmt.  
Medford District Office  
3040 Biddle Rd.  
Medford, OR 97504  
att: Lynda Boody

84

Dear Mrs. Boody,  
I am writing to you today about the  
planned Kelsey Whiskey Timber sale -  
a sale that will not only clearcut old  
growth (of which we have so little left)  
but will also allow for road building  
in an area designated roadless.

Research has shown that older roadless  
forests are most likely to have low  
intensity burns while younger trees  
in roads watershed tend to burn  
better.

I am asking you please to acknowledge  
the unique habitat values of the East  
Fork Whiskey Creek and preserve it.

no roads -

no logging -

Thank you

Corrie Lonsdale

P.O. Box 2319

Waldport, OR 97394

7/1/02

(85)

Dear BLM,

In regards to the Kelley-Whitby timber sale 1) leave the Zane Grey Woodless area alone 2) cease logging in spotted owl habitat 3) for real fire hazard reduction thin the small trees, not the big ones 4) the East Fork Whitby Creek A/CFC should include the full 2,844 acres. 5) Decommission more roads

From an economic standpoint I do not wish any of my tax dollars to subsidize logging (ie wood bidding for timber companies etc.) Any logging sale should make money! If the timber companies say they can't afford it wait. Eventually they will as prices rise. I believe there is a bigger economic value to wilderness & encouraging small business & individuals to work in the forest to harvest Special Forest Products as outlined in your booklet by the above title.

With global warming how will heavily cut forests return or will they?

Thanks  
Del King MD



**KALB CHIROPRACTIC**  
H·E·A·L·T·H · C·E·N·T·E·R

*transform your health through chiropractic & nutrition*

7/2/02

(86)

Att Lynda Boody

Re: Kelsey - Whiskey Timber sale

Dear Lynda -

I want you to know that I strongly oppose this timber sale and I do support protecting the Zane Grey roadless area from any road building or logging.

Please - No logging of big old trees.

- The East Fork Whiskey Creek ACEC should include the full 2844 acres.
- The 10.4 miles of road decommissioning proposed in the DEIS "preferred alternative" sounds good but should be increased.

Thankyou,



2 July 02

To: BLM Medford District Supervisor

21

Dear Supervisor, I'm writing to persuade you to stop the Kelsey-Whiskey timber sale which will clearcut old growth forest and start logging roads into the Zane Grey roadless area. This area contains rare wildlife such as the fisher, Southern Oregon coho salmon, bald eagle, northern spotted owl, tailed frog, Del Norte salamander, and the Northwestern pond turtle. In terms of fire danger, research has shown that "regeneration" (clear cutting) increases fire danger with crowded second growth in both fire likelihood and fire temperature whereas tall old growth forests are more likely to have understory low intensity burns. So I'm not buying the "logging for forest health" pitch. I would like to see a Zane Grey wilderness including the entire 46,646 acres of the Zane Grey roadless area and designate the East Fork Whiskey as ACEC (Area of Critical Environmental Concern) due to it's wildlife habitat value (2,844 acres). 10.4 miles of road decommissioning have been proposed in the DEIS "Preferred Alternative" but I would like to see even more roads taken out.

Every year I get older, I see less and less true wildlands and more and more areas overrun with nonnative black berries, scotch broom, purple spotted knapweed, overcrowded monoculture single species crop-tree forests, and less variety of wildlife. As a hunter, fisher, and backpacker who takes friends and family members with me, this loss is of very deep concern to me.

Thank You Very Much for your time  
and consideration.



Paul T. Howard  
999 NW Sycamore Ave  
Corvallis, OR 97330

88

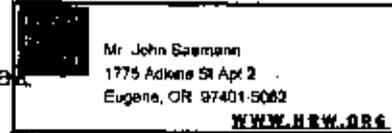
Dear BLM/Medford District:

The east fork of Whiskey Creek ACEC should include all 2844 acres and the DEIS calling for decommissioning 10.4 mi. is a good idea. As you know, older trees are more fire resistant than younger, thicker stands. For that reason they should not be logged.

Please leave the Zane Grey roadless area undisturbed with no road construction or logging in it. Clearcutting for "regeneration" doesn't make sense.

Respectfully yours,

cc: Hon. Peter DeFazio, M.C.



A handwritten signature in black ink, appearing to read "John Saemann", written over the typed name on the business card.

1206 Linda Ave  
Ashland, OR 97520

July 1, 2002

(99)

Dear Mrs Boody:

I am writing with respect to the Kelsey-Whisky timber sale in the Zone Grey Roadless area.

I urge you to leave the roadless area alone! The Zone Grey forests provide irreplaceable habitat for several rare species. Additionally, "regeneration cutting" has been shown to lead to hotter fires (of young plantations in roaded areas) than the low intensity fires of older roadless forests.

Thank you for your consideration.

Sincerely,

Simon Landre

July 1, 2002

Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

(90)

Dear Sirs:

Re the Kelsey-Whiskey timber sale —

- 1) The Zone Key Roadless Area should be left alone —  
NO ROADS AND NO LOGGING
- 2) The BLM should cease logging critical habitats.  
Spotted owls, salmon & other wildlife that depend  
on older forests can't tolerate more habitat destruction.
- 3) Regeneration cutting (a.k.a. clearcutting) of older  
forests increases fire hazards. Older roadless  
forests are most likely to experience low intensity  
burns while young tree plantations in highly  
roaded watersheds tend to burn hot and fast.
- 4) The East Fork Whiskey Creek Area of Critical  
Environmental Concern (ACEC) should include  
the full 2,844 acres. (add here)
- 5) The 10.4 miles of road decommissioning  
proposed in the DEIS is a good start but  
should be increased

add  
to  
#4

[The DEIS acknowledged the unique values of the  
East Fork Whiskey Creek watershed.

I fully agree with the Siskiyou Project's  
comments as above. This is part of Oregon's  
heritage & should be preserved.

Sincerely,

Dorothy J. Laymon  
10820 SW Meadowbrook Dr #63  
Tigard OR 97224-3979

1/02  
Dear Ms Boody;

I Am writing to you to express my concern over the  
Kekey-Whisky timber sale.

The EAST Fork Whisky Creek ACEC should include All  
2844 Acres.

(91)

The 10.4 miles of road decommissioning proposed in the  
DEIS "preferred Alternative" is A good start but should  
be increased.

Regeneration cutting of older forests increases fire  
hazards. NO logging of big, OLD trees.

The BLM should cease logging spotted owl critical  
habitat. Spotted owls, salmon and other wildlife that  
depend on older forests can't tolerate more habitat  
destruction.

The Zane Grey Roadless Area should be left alone -  
NO ROADS & NO LOGGING!

Thank you.  
Sincerely,  
John Paulson

June 29, 2002

Dear Ms. Boody,

92

I'm writing in protest of the Kelsey-Whisky timber sale. The Zane Grey Roadless Area requires protection as designated Wilderness Area. Until such protection is legislated, please do everything in your power to discourage logging and roadbuilding in the area.

Thanks,

Susanna DeFazio  
87805 Walker Creek Road  
Walton, OR 97490

PS: No reply to this letter is necessary.

Susanna DeFazio

93

Dear BLM - LYNOA BOODY

Please stop the massive  
Kelsey-Whiskey timber sale.  
Keep the loggers and their  
roads out of our woods! And,  
we don't believe the logger's  
claims about thinning the  
woods for fire prevention.

Woven Troy  
&  
Shaun Larky

301 QUAIL LN  
GRANTS PASS, OR 97526

Dear Bureau of Land Management,  
(94)

I write to encourage the full protection of the Zane Grey Roadless Area.

This means no roads or logging.

No logging, especially of old, big trees.

The south loses trees yearly, and these fires and thinning's only add to our loss. It is time to put a halt on all this nibbling away!

The East Fork Whiskey Creek ACEC should include the full 2,844 acres.

The 10.4 miles of road decommissioning proposed in the DEIS "preferred alter native" is a good start but should be larger!

Sincerely, David Stone - <sup>registered</sup> voter  
Portland

(95)

June 29, '8

BLM:

The Zane Gray Roadless Area should be preserved as WILDERNESS and included in any wilderness legislation. The massive Kelsey-Whiskey timber sale threatens to clearcut ancient forests & punch logging roads into pristine areas.

Save our Oregon heritage!

Julie Remmerde  
3410 Marney St.  
Vanc. WA 98660-1829

July 1, 2002

Dear Ms. Boody,

96-1

The Zone Buyback Area should be left alone. We have so few roadless areas that no roads or logging of any kind should be allowed in them.

The BLM should cease logging in any spotted owl critical habitat. Spotted owl and other wildlife that depend on older forests cannot tolerate more habitat destruction.

There should be a ban on cutting any big old growth trees. They are the survivors, the best seed for regenerating the forests. We must leave old growth forests alone. There are so few left.

96-2

suggested that the East Fork  
Turkey Creek ACEC should  
include the full 2,874 acres.

The 10.4 miles of road decom-  
missioning proposed in the DEIS  
"preferred alternative" is a good  
start but should be increased.

I would like to see all harvesting  
of wood in public lands banned as  
it is not a source of revenue -  
in fact it ends up costing the  
 taxpayer money overall. Increased  
light recreation use and the <sup>sustainable</sup>  
harvesting of other forest plants would  
be a better use of our forests.

Sincerely,

Helon Howard



Helon Howard  
4415 Cedar Flat Rd.  
Williams, OR 97544

Dept of Bureau of Land Management,  
 Please save the Helvey - Hickory  
 timber. This new cutting would  
 remove the zone that would  
 be a cut and logging roads  
 throughout. No roads and no  
 logging, wildlife can not survive  
 more habitat destruction. Clearcutting  
 of big old trees should never  
 happen again!!

I hope in the East Fork Whiskey  
 River Creek be included in the  
 full 2,000 acres.

I would like to see the 10.4  
 miles of road decommissioning proposed  
 in the D.E.P. proposal as well.

Thank you.

Sincerely,  
 George H. Lee  
 10416 Nevada St  
 Detroit, MI 48220



**BLACKBIRD**  
REAL ESTATE

98

7/1/02

DEAR BLM,

THE ZANE GREY ROADLESS AREA SHOULD BE PRESERVED AS WILDERNESS AND LEFT ALONE....NO ROADS, NO LOGGING.

PLEASE CEASE LOGGING IN CRITICAL SPOTTED OWL HABITAT. SPOTTED OWLS, SALMON AND OTHER WILDLIFE THAT DEPEND ON OLDER FORESTS CAN'T TOLERATE MORE HABITAT DESTRUCTION.

REGENERATION CUTTING IS CLEAR CUTTING. PLEASE NO LOGGING OF BIG, OLD TREES.

THE EAST FORK WHISKY CREEK ACEC SHOULD INCLUDE THE FULL 2844 ACRES.

THE 10.4 MILES OF ROAD DECOMMISSIONING PROPOSED IN THE DEIS PREFERRED ALTERNATIVE IS A GOOD START BUT SHOULD BE INCREASED.

THANK YOU FOR YOUR TIME AND CONSIDERATION OF THIS MATTER.

SINCERELY,

ELETHEAH KESARAH  
REALTOR/CONTRACTOR  
CCB#134951.

# Shiitake Far West

Forest Mushroom Growers

Fresh • Dried • Retail • Wholesale

6/27/02

99

District Manager,

I am writing with regard to the proposed Kerby-Whiskey timber sale & Zane Grey address area.

Zane Grey should not be roaded or logged because of its irreplaceable habitat & beauty. "Regeneration" cutting is clearly a ploy to log old growth & is not a - justification to reduce fire. Informed citizens who care about our national forests know this. So why does our Dept. of Ag. keep repackaging the same old logging proposals & keep trying to shove it back in our faces.

Responsible forestry practices are our present & future. This should mean no clear cuts.

Also East Fork Whiskey Ck ACEC should include the full 2,844 acres.

Sincerely,  
Steve Krisa

1014 Black Oak Drive  
Medford, OR 97504  
June 27, 2002

Dear Ms. Boody:

(100-1)

I am writing in regard to the Kelsey-Whiskey Timber sale. Included in this sale are plans to construct logging roads and cut trees in the zone they Roadless Area. 355 acres of old-growth forest is to be clearcut as protection from fire; this flies in the face of scientific studies which show roadless forest with big, older trees tending to low-intensity burns, whereas plantations of young trees - "regeneration" - tend to burn hot and fast when a fire gets started. If piles of woody debris remain following logging operations, the danger of fire is worst of all.

Public opinion and scientific research are heavily against both the logging of old-growth trees and road-building/logging in any of the nation's remaining roadless areas. There should be NO roads and NO logging in the zone they Roadless Area. The largest intact roadless area under BLM management nationwide, it is a spectacular landscape harboring rare and threatened species - northern spotted owls and tailed frogs, fishes, Del Norte salamanders and Southern Oregon coho, to name a few. This is irreplaceable habitat along the Wild and Scenic Rogue River. It should be left alone.

It appears this plan as currently proposed will degrade more than a thousand acres of critical habitat for the northern spotted owl. Continual diminution of habitat for the owl and other wildlife is unacceptable. Critical habitat is just that - a necessity for their survival.

The unique habitat values of East Fork Whiskey Creek should be fully protected by designating the entire 2844 acres under the Area of Critical Environmental Concern; and the proposed decommissioning.

of 10.4 miles of road is an excellent beginning, although more should be removed in the interest of fire protection and erosion prevention.

Thank you for your attention to these issues. I hope to see them made right in a revised sale plan.

Sincerely,

Carol Ampel

Carol Ampel

100-2

June 26, 2002

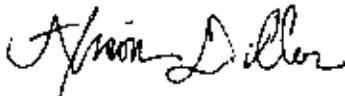
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
Attn: Lynda Boody

101

I am writing today to encourage the BLM to not build roads or log the Zane Grey Roadless Area and the adjacent old growth and mature forests along the Wild and Scenic Rogue River. The logging should not happen in areas where spotted owls, salmon and other wildlife depend on the older forests; they cannot tolerate such destruction. Regeneration of the older forests, otherwise known as clear cutting, increases fire hazards as it is known that older, roadless forests are most likely to experience low intensity burns, while young tree plantations in highly roaded watersheds tend to burn hot and fast. The road decommissioning in the DEIS "preferred alternative" is a good start, but should be increased from the proposed 10.4 miles.

As a citizen and voter in Southern Oregon, student of biology and naturalist, I would not like to see the BLM move forward with the Kelsey-Whisky timber sale. The DEIS states that 355 acres of old forests would be clearcut and 1,259 acres of Northern spotted owl habitat that has been designated "critical" by the US Fish and Wildlife Service would be degraded. This is not acceptable and I encourage decision-makers to consider and preserve the habitat values of these ancient forests.

Sincerely,



Alison Miller  
1354 Quincy St #10  
Ashland OR 97520

June 26, 2002

Ms. Lynda L. Boody, Field Manager  
Glendale Resource Area  
Medford District, BLM  
3040 Biddle Road  
Medford, Oregon 97504

102-1

RE: Kelsey Whiskey Draft Environmental Impact Statement

Dear Ms. Boody:

Southern Oregon Timber Industries Association (SOTIA) is in receipt of the Kelsey Whiskey Draft Environmental Impact Statement (EIS), dated March 2002, and your cover letter, dated April 16, 2002. SOTIA has reviewed the EIS and is in support of Alternative 1, the No Change Alternative. SOTIA does not support the proposal to amend the Medford District Resource Management Plan and designate a new Area of Critical Environmental Concern (ACEC) and Research Natural Area (RNA).

Under the Northwest Forest Plan (NWFP), less than 20% of the Medford District is dedicated to General Forest Management Area (GFMA) acres where timber management is allowed as one of the multiple uses. When the Medford District is unable to meet current annual timber supply amounts called for in the NWFP, to further reduce GFMA acres with the establishment of a new ACEC and RNA is counter to Oregon and California (O&C) Act mandates as described in the Purpose and Need statement, pages 1-3, 1-4. Furthermore, it is documented in the Draft EIS that poverty rates in the area are well above Oregon's statewide average, page 3-23. Reduced timber supply will not help alleviate this social condition.

The "need" to protect the Tanoak/Douglas-fir/Satal/Evergreen Huckleberry plant group should be accommodated within existing Late Successional Reserve acres already designated in the Kelsey Whiskey planning area. On GFMA acres, the Survey and Manage requirements of the NWFP are more than sufficient to protect flora and fauna of "special interest".

A listing of private landowners with reciprocal Rights-of-Way agreements within the Kelsey Whiskey planning area is provided in Table 3-6, page 3-37. These agreements must be honored by the Glendale Resource Area and any proposed BLM road closures must not affect these private landowners access rights.

Ms. Lynda Boody  
Kelsey Whiskey Draft EIS

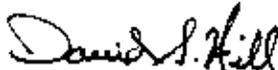
102-2

Page 2

In conclusion, SOTIA does not support the establishment of a new ACEC and RNA in the Kelsey Whiskey planning area. The Northwest Forest Plan has been a disaster for the rural economy of southwest Oregon. The limited amount of General Forest Management Areas in the Glendale Resource Area should be managed for multiple use, including renewable timber management and harvest. Further reductions in annual timber harvest levels will not contribute to the "economic stability of local communities and industries" as required by the O&C Act of 1937.

SOTIA encourages the Glendale Resource Area to adopt Alternative 1 in the Kelsey Whiskey Draft EIS. We thank you for this opportunity to review and comment on the Draft Landscape Plan.

Sincerely,



David S. Hill  
Executive Vice President

cc: Congressman Greg Walden  
Senator Gordon Smith  
Senator Ron Wyden  
Rocky McVay, Association of O&C Counties  
Swanson Group, Inc. (Superior Lumber Company)  
Roseburg Forest Products  
Larry Brown

June 26, 2002

Bob Rodriguez  
POB 1370  
Cave Junction OR 97523

103

BLM Medford  
Lynda Boody

Dear Ms. Boody:

I have no objections to the Kelsey-Whiskey Timber Sale. I believe it should be conducted; as there are no pressing reasons to avoid it, other than the usual knee-jerk reaction of certain organizations intent on blind preservation.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. Rodriguez", written in black ink.

Robert R. Rodriguez

# Swanson Group

PO Box 250 • 2695 Glendale Valley Road • Glendale, OR 97442 • Phone: (541) 832-1121 • Fax: (541) 832-1139

104

Ms. Lynda L. Boody, Field Manager  
Glendale Resource Area  
Medford District, BLM  
3040 Biddle Road  
Medford, Oregon 97504



June 17, 2002

Dear Ms. Boody:

I would like to take this opportunity to comment on behalf of Swanson Group, Inc. regarding the proposed Kelsey-Whiskey Draft Environmental Impact Statement. For many years our company has relied on timber produced from the Glendale Resource Area to supply Superior Lumber/Veneer and Plywood operations in Glendale, Oregon. As the largest employer in Glendale, our operations are extremely important to the community stability and economic livelihood of Glendale and the surrounding area. We have carefully reviewed the proposal to amend the Medford District Resource Management Plan by designating a new "Area of Critical Environmental Concern and Research Natural Area". We firmly oppose such a move and strongly urge the selection of Alternative I, the No Change Alternative.

As a key element of the Northwest Forest Plan (NWFP), Federal agencies were to sell a predictable and sustainable timber sale volume on an annual basis. This promise of stable timber supply was to contribute towards community stability by providing timber industry jobs in rural areas of Oregon. The Medford District of the BLM has yet to meet the annual timber sale objectives as called for in the NWFP. With less than 20% of the Medford BLM District land base allocated to General Forest Management, it escapes me how further erosion in acres committed to "multiple use" will achieve anything but further **reduce** the timber sale program.

I have grave concerns about the implications of additional land-use constraints on the rights of reciprocal right-of-way holders, such as Swanson Group, Inc. with the addition of a new overlay of operating restrictions. It is imperative that the Glendale Resource Area honor these road use agreements and protect the rights of private landowners with any present or future planning initiatives.

There are no "special interests" within the planning area that cannot be accommodated by existing "Late Successional Reserves" as designated within the guidelines of the NWFP. The "Northwest Forest Plan" has been a cruel hoax, placing terrible burdens on the Forest Products Industry and local governments of Southwest Oregon. The amount of land allocated for multiple forest use including timber harvest is already very limited. To "take another bite at the apple" and further diminish our meager timber supply is ill-advised and should be discouraged.

Placing additional land in no harvest set-asides is not in the best interest of our public forest lands, such a plan is simply headed in the wrong direction. Rather than further limiting options, the BLM needs to seek active management prescriptions, salvaging and thinning overcrowded stands to improve long-term forest health.

#### Dimension Lumber

Lumber Sales: (541) 832-1218  
Lumber Sales: (541) 832-1222  
Lumber Sales: (541) 832-1241  
Sales Fax: (541) 832-1232

#### Stud Lumber

Stud Sales: (541) 832-1145  
Stud Fax: (541) 832-1235

#### Veneer & Plywood

Veneer Sales: (541) 832-1130  
Plywood Sales: (541) 832-1175  
Veneer & Plywood Fax: (541) 832-1177



738 Glendale Ave  
Ashland OR 97520  
June 11, 2002

Dear Ms Boody: (105)

Please support the designation of the  
Zane Grey Roadless Area as  
Wilderness. In addition please  
adopt the No Action Alternative  
on the proposed Kelsey Whiskey  
timber cut.

Preserve the old growth timber,  
protect the wildlife, prevent  
erosion in this large area  
along the Rogue River.

Thank you.

Sincerely  
Robert L Harney

Linda Boody  
Bureau of Land Management  
3040 Biddle Road  
Medford, OR 97504

June 6, 2002

Ref. to Proposed Kelsy Whiskey timber sale

Dear Ms. Boody,

106

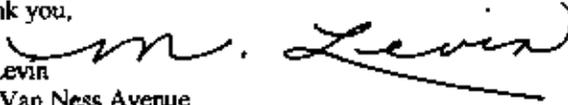
I am familiar with the area proposed for a timber sale, and I am strongly opposed to the introduction of roads to facilitate the removal of timber. The Zane Grey Roadless area impacts the Rogue River habitat, and the intrusion of equipment and destruction of forest habitat will have a devastating effect on the flora and fauna of this region. This is a relatively pristine area, and it should be saved.

I am enclosing photos taken recently from this area as a graphic reminder of what is at risk. These lands belong to all the people and do not exist for the benefit of the timber industry. The Bureau of Land Management has a solemn responsibility in the protection of the public lands. Study these pictures --and don't approve of this plan to cut old-growth timber.

Please support the designation of the Zane Grey roadless area as a Wilderness area and please choose the No Action alternative on the timber cut.

Thank you,

M. Levin  
129 Van Ness Avenue  
Ashland, OR 97520



6/4/02

To whom it May Concern, (107)

I am writing to comment on the Kelsey Whiskey DEIS. Although I live in California, I often travel to the Rogue to go fishing.

I think the only truly wise decision for the Zane Gray Roadless Area is "no-action".

We all are aware there aren't many roadless areas left in Oregon. Likewise, we know what roads do to rivers, even wild & scenic rivers like the Rogue. Please save some wild places & clean water for us little fisher folk, and our anadromous friends. "NO-ACTION" for Oregon's largest roadless area!!!!

Sincerely,  
Diane Hillgrove





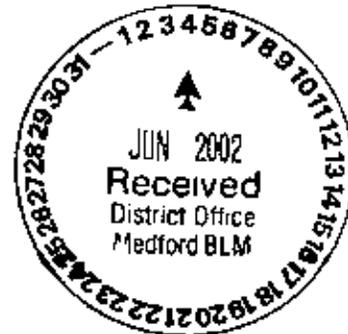
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

Reply To  
Attn OF: ECO-088

MAY 29 2002

Lynda Boody  
Glendale Field Manager  
Medford District  
Bureau of Land Management  
3040 Biddle Road  
Medford, OR 97504

168-1



Dear Ms. Boody:

We reviewed the draft environmental impact statement (EIS) for the **Kelsey Whisky Landscape Management Plan and Associated Medford District Resource Management Plan Amendments** in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements. For further explanation of our EIS review responsibility, please refer to *EPA's Section 309 Review: The Clean Air Act and NEPA* that is attached.

EPA reviews EISs for both environmental and procedural concerns. Our main environmental concern is that this project may affect two species listed under the Endangered Species Act (ESA). Alternative 2 (the preferred alternative) would adversely affect 10 acres of suitable habitat for marbled murrelet and may also affect one specific site for northern spotted owl and critical habitat in general for northern spotted owls. Alternative 1 calls for more regeneration harvesting (273 acres) and Alternative 4 calls for no regeneration harvesting with only commercial thinning. Alternative 3 is the no-action alternative. Effects to the listed species are characterized as greater and lesser under Alternatives 1 and 4, respectively, compared to the preferred alternative.

BLM is conducting formal consultation with the US Fish and Wildlife Service (FWS) because of the potential adverse impacts. The outcome of these consultations will result in FWS issuing a Biological Opinion (BO) which will determine if there is jeopardy or non-jeopardy to the species. Depending on the determination, the FWS will specify "reasonable and prudent alternatives or measures" to avoid jeopardy or conserve the species, respectively.

99-039-BLM  
CEQ # 020129

108-2

EPA has no significant procedural concerns and believes the BLM has adequately disclosed the impacts in the EIS in accordance with NEPA. But because of the ESA concerns and until the results of the BO are known, EPA has rated this project EC-1, Environmental Concerns - Adequate EIS. The rating is based on BLM's preferred alternative (Alternative 2). Our rating and a summary of our comments will be published in the Federal Register. We have enclosed an explanation of the EPA rating system.

While we believe the EIS is adequate procedurally, we have provided suggestions for further improvements.

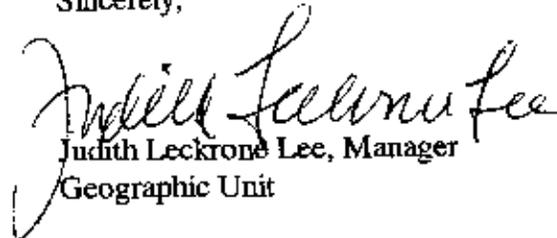
- The EIS should discuss how coordination will be carried out between the ESA Section 7 Consultation process and NEPA. This would be consistent with Section 1502.25 of the Council on Environmental Quality (CEQ) regulations for implementing NEPA. Conclusions from a BA should be included in the draft EIS and the Biological Opinion (BO) should be in the final EIS or at the latest in the Record of Decision. It is our understanding that you have already begun Section 7 consultation with the FWS in accordance with the ESA and that an earlier BA was a source of information for the draft EIS. We suggest that the final EIS reflect this information as well. This should be reflected in the final EIS.
- It appears some activities (prescribed fires, commercial density management, and regeneration harvests) are proposed to be carried out in the Late Successional Reserves. Please explain how these activities will protect and enhance conditions of late-successional and old-growth forest ecosystems and if they will be reviewed by the Regional Ecosystem Office in accordance with standards and guidelines set out in the Northwest Forest Plan.
- Under Alternative 3, there is concern that there will be an increased risk of wildfire because there is no vegetation treatment and thus a loss of spotted owl *sites* [emphasis added for clarity of comments] and *critical habitat* for spotted owl and marbled murrelet. It would seem there should also be concern for loss of *suitable habitats* for spotted owl and marbled murrelet due to increased risk of wildfire as well but this is not mentioned. If this is not the case, explain why wildfire can impact *critical* but not *suitable* habitat.
- It is not clear what type of vegetation treatment is entailed by commercial density management, nor is it defined in the glossary. We at first assumed it was thinning but both terms are used in this EIS, which indicates that they are different. Please define these terms better.
- Explain the rationale for decommissioning the particular roads that are proposed and how that fits in with an overall strategy for closing and decommissioning roads.
- The EIS provides a good discussion on air quality issues from prescribed burning.

408-3

Attached is an overview of the Interim Air Quality Policy on Wildland and Prescribed Fires. It would behoove BLM to briefly discuss this policy and state that the approach to managing smoke from prescribed burning is consistent with this overarching national policy that balances clean air with the need to burn.

Our rating and a summary of our comments will be published in the Federal Register, and we have enclosed an explanation of the EPA rating system. We thank you for the opportunity to review and offer comments on this project. If you have questions, please contact me at (206) 553-6911 or Andy Smith at (206) 553-1750.

Sincerely,

  
Judith Leckrone Lee, Manager  
Geographic Unit

cc: David Powers, ECO

## Comments on Kelsey Whiskey Draft Management Plan

109

May 1, 2002

### **HOT SPOT: Jobs vs. Environment**

Americans who think about the future of life may agree that the Science of Economics 2002 is becoming obsolete.

To imagine that logging our wilderness for money to be invested is more profitable than a reserve core wilderness is short sighted.

At the end of the century, which will be more profitable - logging the wilderness for immediate limited investment, or saving the plants and animals, maintaining pure mountain waters in abundance, as well as aiding in the creation of atmosphere for all of Southern Oregon for all time?

Wisdom suggests we take a close look at what kind of Southern Oregon we want to live in.

A lot of eyes have been opened. Saving the Spotted Owl automatically entails preserving primeval groves of Douglas Fir, Ponderosa and Sugar Pine, Sitka Spruce, and Redwood by incorporation of integrally functioning units of mature climax forest into the public trust. More Spotted Owl nesting areas are located in scenic canyons such as the Rogue and their drains, such as Kelsey Creek and Whiskey Creek. So these too must be preserved along with their adjacent clear running streams.

To put it in words that even a timber baron can understand: What the Spotty need to thrive is nothing less than the stuff national parks are made of. A proper Spotted Owl breeding site is a mini Mt. Hood or Crater Lake National Park. Time and again from every conceivable angle national parks have proven to be the most valuable real estate in the nation.

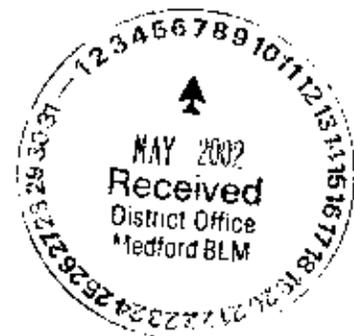
Can anyone seriously argue against a chain of new mini wilderness "parks" in the Cascades and Siskiyou?

The Spotted Owl sells itself. Is it not a wise owl?

*From Jane Moody*

*In the heart of the Wild and Scenic Rogue River Canyon*

Jane Moody  
Box 182  
Glenadele Or.  
97442



Karen Salley PhD  
801 Pinecrest Terrace  
Ashland, Oregon 97520  
541-482-1672



4-20-02

Shawwood Tubman, Team Leader  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97507

(110)

Dear Mr. Tubman and Team Members,

After reviewing the Kelcey Whiskey Draft  
Landscape Management Plan, I strongly  
recommend the selection of ~~Option Three~~  
Alternative Four. My reasons for this  
are my concerns regarding:

- i. Any impact of other alternatives on  
proposed wilderness areas  
in or near this area.
- ii. the cumulative effects of sedimentation  
in the Rogue River from logging and  
road building resulting from other  
alternatives
- iii. questions about impact on the watershed  
of the Wild and Scenic Rogue River  
caused by other alternatives
- iv. general questions related to Rogue River  
watershed issues

Please contact me if you have questions or  
comments about my concerns

Thank you  
Karen L. Salley

4/6/02

Dear Mr. Tubman,

111-1

my home is located on some acreage in the northwest corner of section 14, T33, R9. I only feel qualified to speak about the proposals for section 15 and 11 as these are among the few areas that I'm intimate with as a result of living there these last 21 years. The RMP for Kelsey Whiskey Landscape Management concerns me on section 15 and alarms me on section 11. I am not a tree hugger, I believe in sensible and timely harvesting of timber resources when considered alongside the environmental costs to the future. I will comment on section 11, 11-1 and 11-3 as my issues here are considerable.

This area is full of spotted owls, not just a few but many. This area can be seen from the river. A hatter enjoying the scenic wilderness does not want to see devastation along his line of sight when he turns his head to his right. This is all old growth and when it is cut there is next to nothing else there except for many small springs which feed this area and would probably be damaged in their flow if cuts were made near by to them. This is a very sensitive area! It is also very steep and thus highly visible.

111-2

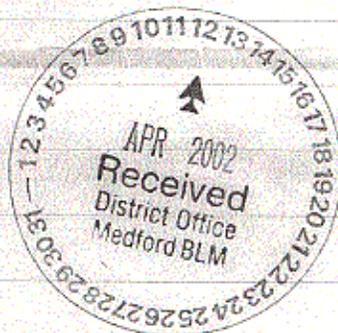
To see this old growth area scattered with boards, a fine pond, "wildlife pond" instead of natural springs, and many vast holes of forest where the big trees grew, would be a very dear cost for a few board feet of relatively poor lumber. I counsel to leave this spot alone.

Section 15, 15-1 is less sensitive and already has a broad spectrum of timber in all sizes, although the upper half can also be seen from the river. The upper half is park like in its beauty. Some thinning could be done here. aggressive activity would be a mistake. I would shudder at any more boards and landings. The public deserves to see ground so near the river left with some of its beauty intact.

Best Regards,

Steven Palinger  
4/6/02

512-918-8495



(112)

P.O. Box 1444  
Cave Junction, OR 97523  
July 9, 2002

Dear Official:

As a 30 year resident of  
S.W. Oregon and a retired  
forester, I support attorney  
A in the DEIS for the  
Kelsoy - Whiskey planning unit.  
To further erode the ecological  
and recreational integrity of  
this roadless area as would  
occur with the proposed action  
would be a backward step  
in forest management.

Sincerely,  
Dwight Shole



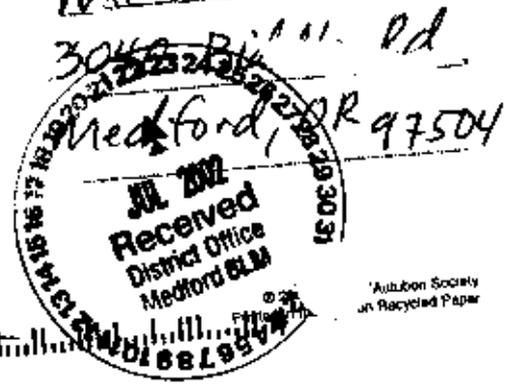
Carla Winston  
 2028 Dutchess Rd.  
 Lithia Springs, GA 30122

(13)

Dear Friends @ BLM,  
 I oppose logging and  
 regenerating old growth  
 forests in the Zane Grey  
 Roadless Area. Please  
 no roads and no logging  
 in this unique, critical

© Robert Winston, 1986

Ms. Lynda  
 c/o BLM  
 Medford Office



h habitat.  
 Our national symbol, the Bald eagle  
 Protected by the Endangered Species Act, the majestic  
 Bald eagle has made a spectacular comeback from the  
 brink of extinction.

Sincerely,  
 Carla Winston

To find out how you can help save America's wildlife by  
 becoming a member, call the National Audubon Society  
 at 1-800-274-4201.

Audubon Society  
 on Recycled Paper

# Swanson Group, Inc.

PO Box 250 • 2695 Glendale Valley Road • Glendale, OR 97442 • Phone: (541) 832-1121 • Fax: (541) 832-1139

June 17, 2002

Ms. Lynda L. Boody, Field Manager  
 Glendale Resource Area  
 Medford District, BLM  
 3040 Biddle Road  
 Medford, Oregon 97504



Dear Ms. Boody:

I would like to take this opportunity to comment on behalf of Swanson Group, Inc. regarding the proposed Kelsey-Whiskey Draft Environmental Impact Statement. For many years our company has relied on timber produced from the Glendale Resource Area to supply Superior Lumber/Veneer and Plywood operations in Glendale, Oregon. As the largest employer in Glendale, our operations are extremely important to the community stability and economic livelihood of Glendale and the surrounding area. We have carefully reviewed the proposal to amend the Medford District Resource Management Plan by designating a new "Area of Critical Environmental Concern and Research Natural Area". We firmly oppose such a move and strongly urge the selection of Alternative I, the No Change Alternative.

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There are no "special interests" within the planning area that cannot be accommodated by existing "Late Successional Reserves" as designated within the guidelines of the NWFP. The "Northwest Forest Plan" has been a cruel hoax, placing terrible burdens on the Forest Products Industry and local governments of Southwest Oregon. The amount of land allocated for multiple forest use including timber harvest is already very limited. To "take another bite at the apple" and further diminish our meager timber supply is ill-advised and should be discouraged.

Placing additional land in no harvest set-asides is not in the best interest of our public forest lands, such a plan is simply headed in the wrong direction. Rather than further limiting options, the BLM needs to seek active management prescriptions, salvaging and thinning overcrowded stands to improve long-term forest health.

#### Dimension Lumber

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 Lumber Sales: (541) 832-1241  
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 Stud Fax: (541) 832-1235

#### Veneer & Plywood

Veneer Sales: (541) 832-1130  
 Plywood Sales: (541) 832-1175  
 Veneer & Plywood Fax: (541) 832-1177

114-2

We strongly encourage the BLM to **adopt Alternative I** for the Kelsey Whiskey Draft EIS. Thank you for your consideration of our comments on this very important issue concerning the future of our company and our community.

Very Truly Yours,

*Gordon Culbertson*

Gordon Culbertson  
VP Resources

Cc: Congressman Peter DeFazio  
Congressman Greg Walden  
Senator Gordon Smith  
Senator Ron Wyden

**Barry Snitkin**

**<barry@siskiyou.org**

**>**

07/09/02 03:03 PM

To:

cc:

Subject:

or110mb@or.blm.gov

Kelsey Whiskey

Ms. Boody et al:

Once again your agency is offering the public more of the same. We have many treasures in the Siskiyou Wild Rivers. One of them is the Zane Grey roadless complex: a remarkably wild and rugged forest amid an ocean of clearcuts along the famous Wild & Scenic Rogue River.

This 46,646 acre area is the largest intact forested roadless area managed by the BLM in the entire country. The ancient forests of Zane Grey currently provide irreplaceable habitat for rare species such as the northern spotted owl, fisher, Southern Oregon coho salmon, bald eagle, tailed frog, Del Norte salamander, and Northwestern pond turtle.

Your agency is proposing to log 1,324 acres (over 8 million board feet) within the Zane Grey Roadless Area and in adjacent old-growth and mature forests along the Wild & Scenic Rogue River. And you plan to log and construct 1.9 miles of logging roads into this spectacular forest.

The Draft Environmental Impact Statement (DEIS) calls for clearcutting aka "regenerating" 355 acres of old forests, and degrading 1,259 acres of Northern spotted owl habitat that has been designated "critical" by the US Fish and Wildlife Service.

As a citizen who values clean air, clean water, healthy forests and rivers I'd like to urge you to **LEAVE ZANE GRAY ALONE!**

Your forest policies promote fires in a way that are devastating to the forests. **DON'T CUT OLD GROWTH TREES.** The latest scientific research shows that older, roadless forests are most likely to experience low intensity burns, while young tree plantations in highly roaded watersheds tend to burn hot and fast. BLM should also **CEASE** logging spotted owl critical habitat

It's about time BLM designated the largest proposed Area of Critical Environmental Concern (ACEC) to preserve the habitat values of the 2,844 acres in East Fork Whiskey.

Yours truly,

Barry Snitkin  
POB 2565  
Cave Junction, Or. 97523  
541-592-2693  
541-592-4459

As Dorothy Day said, "No one has the right to feel hopeless. There's too much work to do."

# 116

"David Dillon (d)"

<dillond@nehalem.tel.net>

07/10/02 02:32 PM

To: <or110mb@or.blm.gov>, <peter.defazio@mail.house.gov>  
cc: Positive Comments on Logging in Zane Grey Area

These are my comments on the Draft Environmental Impact Statement  
for Mining  
for the Kelsey-Whisky timber sale:

I support BLM's proposal to log in native and old-growth forests  
in the Zane  
Grey roadless area.

I believe that:

The Zane Grey Roadless Area does not need to be protected from  
roadbuilding  
(temporary or permanent) and or logging.  
The Kelsey-Whisky sale would have no impact on any Northern  
Spotted Owl  
habitat which may or may not be in the area.  
The logging of old-growth and mature forests habitat decreases  
fire risk!

Thank you for considering my comments, which are probably a lot  
different  
than the ones you usually hear.

Respectfully,  
David Dillon  
PO Box 188, Manzanita, OR 97130

dillond@nehalem.tel.net

117

**justin.fleming@orst.edu**

07/10/02 02:51 PM

To: or110mb@or.blm.gov  
cc: Kelsey-Whisky sale

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

- \* the Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!

- \* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!

- \* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres

- \* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be

made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,

Justin Fleming  
Student Recycling Coordinator-OSU  
Campus Recycling  
644 SW 13th St.  
Corvallis, OR 97333  
phone: (541) 737-7349

e-mail: [justin.fleming@orst.edu](mailto:justin.fleming@orst.edu)

# 118

**dave metz**  
<dcmetz1@yahoo.com>  
m>

07/10/02 03:51 PM

To: or110mb@or.blm.gov  
cc:  
Subject: No logging of Old Growth

Hello,

I want to inform you that I support the ban of logging old growth trees on public land. Primary forests are far more fire resistant than secondary. Big trees do not equal big fire. Smaller, secondary trees along with greater undergrowth which grows more abundant when the forests are cut and light is let in.

The soil dries out, species die, pioneering plants proliferate. Logging old growth is more likely to cause a catastrophic fire than not logging old growth, besides, most of the public wants the end of old growth logging. As soon as our Federal agencies finally get this the better for all. Sincerely,  
Dave Metz

---

Do You Yahoo!?

Sign up for SBC Yahoo! Dial - First Month Free

<http://sbc.yahoo.com>

# 119

**Judith Gonzalez**  
<judith@southeastuplift.org>

07/10/02 03:54 PM

To: <or110mb@or.blm.gov>  
cc:  
Subject: Noooooooo Kelsey-Whisky!

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

- \* the Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!

- \* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!

- \* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres

- \* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,

Judith Gonzalez Plascencia

235 SE 18 St.

Portland. OR 97214

# 120

"yake"  
<yake@thurston.com  
>  
07/10/02 04:02 PM

To: <or110mb@or.blm.gov>  
cc:  
Subject: Kelsey-Whisky timber sale

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale.

The BLM should not log, or permit the logging of, native and old-growth forests in the Zane Grey roadless area.

Further:

- \* the Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!
- \* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!
- \* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres
- \* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,  
Bill Yake  
4032 Green Cove St. NW  
Olympia WA 98502-3520

# 121

"Steve Koller"  
<kollersj@cavenet.com>  
m>  
07/11/02 01:39 PM

To: <OR110MB@or.blm.gov>  
cc:  
Subject: political interest

Hi,

This will be short to save my time and your time. First, you should keep out of Zane Grey Forest, it should not be logged. That wilderness area is one of the few remaining wild stands in this country.

Secondly, if you do log it, I certainly hope you WILL NOT clearcut it. Everybody knows that clearcutting is bad.....EVERYBODY!! Even loggers know it. I'm sure that even you yourself understand that selective cutting is much more low impact and yields better long-term timber.

Thank you for your time, Steve Koller

# 122

"Dave Willis"

<sodamtn@mind.net

>

07/12/02 02:35 PM

To: <lynda\_boody@blm.gov>

cc:

Subject: Public Comment on Kelsey-Whisky Timber Sale DEIS

To: Lynda Boody, Field Manager  
Glendale Resource Area  
Medford District BLM

RE: COMMENTS ON KELSEY-WHISKY DEIS

Dear Ms. Boody:

On behalf of the board and membership of the Soda Mountain Wilderness Council, I urge you to:

- 1) **Build no roads and do no logging in the Zane Grey Roadless Area** proposed for designated Wilderness by the Oregon Wilderness Coalition.
- 2) Do no logging of spotted owl habitat.
- 3) NO LOGGING OF BIG OLD TREES -- that only increases fire hazard.
- 4) The East Fork Whisky Creek ACEC should include the full 2,844 acres.
- 5) The 10.4 miles of road decommissioning proposed in the DEIS' "preferred alternative" is a good start. Many more road miles in the area should also be decommissioned.

Please do all you can to preserve and enhance the wilderness values of the area.

Sincerely,

Dave Willis, Chair  
Soda Mountain Wilderness Council  
15187 Greensprings Highway  
Ashland, OR 97520  
541-482-8660 office

541-482-0526 home  
541-944-2247 cell  
541-482-2036 fax

[sodamtn@mind.net](mailto:sodamtn@mind.net)

# 123

**"S. Gertsch/R.  
Moore"**  
<[aloha@verizon.net](mailto:aloha@verizon.net)>

07/10/2002 01:32 PM

To: <[or912mb@or.blm.gov](mailto:or912mb@or.blm.gov)>

cc:

Subject: Kelsey Whiskey timber sale

I didn't mean to send the e-mail I just sent because my message wasn't finished.

Please forward this comment to Sherwood Tubman at the Medford BLM office.

Dear Sherwood Tubman,

This is a comment on the Kelsey Whiskey timber sale.

I oppose the current form of the Kelsey Whiskey timber sale. The sale plans to log 4.8 to 12.9 million board feet of timber and build up to 4 miles of new road. These new roads and clear cuts will affect northern spotted owls, bald eagles and the sensitive Del Norte salamander.

This timber sale intersects the Zane Grey Roadless Area, the largest forested BLM roadless area in the entire U.S. The Zane Grey Roadless Area includes 24 miles of the Wild and Scenic Rogue River and is contiguous with the designated Wild Rogue Wilderness Area.

In regard to the Kelsey Whiskey timber sale, I oppose:  
-the building of new roads, even temporary ones;  
-the cutting of mature and old-growth trees; and  
-cutting in the proposed Wilderness boundary (roadless area).

Roadless areas and old-growth forests are the most fire resistant forests, and logging them increases the risk of intense fires since only young trees and brush are left.

Please do not send a copy of the Environmental Impact Statement or anything

else sent to my address.

Sincerely,

Steve Gertsch  
2420 SW 171st pl

Aloha, OR 97006

# 124

**Beverly McDonald**  
**<Beverlymcdonald@i**  
**pkoke.com>**

07/11/02 08:59 AM

To: "or110mb@or.blm.gov" <or110mb@or.blm.gov>

cc:

Subject: Zane Grey Roadless Area

Dear Ms. Boody,

My family has had the privilege of annual float trips through the Rogue River Wild and Scenic area for over 20 years. These trips provide spiritual renewal along with recreation in a place, isolated from the distractions of regular life. I can't tell you how much we value this experience.

The Zane Grey Roadless Area is the largest roadless area in the nation on BLM land. For this reason alone, it should remain so. The serenity and beauty would be altered dramatically with road building. A different value than monetary, but imperative to the restoration of quality of life on this planet.

Science has proven that roadless, old-growth areas are more fire-resistant than those logged. After this year's early season of fire damage, protection is of concern. We need to keep in mind that (2) of the large fires this season were set by individuals seeking their own job security.

Destruction of habitat for Northern Spotted Owl and countless other sensitive species, eroding hillsides which damage watershed, while increasing fire damage is a poor exchange for temporary profits from the

sale of timber.

Thank you for considering my comments. Please decide to keep this area of great beauty road-free and unlogged so this watershed may be protected.

Sincerely,  
Beverly B. McDonald  
55 Prall Lane

Eugene, Oregon 97405

# 125

**"Wayne Kelly"**  
**<waynekins@hotmail.com>**

07/11/02 10:58 AM

To: or110mb@or.blm.gov

cc:

Subject: Kelsey-Whiskey Timber Sale

Wayne L. Kelly  
1257 Siskiyou Blvd, #1133  
Ashland, Oregon 97520

Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, Oregon 97504

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whiskey timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

- the Zane Grey roadless area should be protected - no roadbuilding (temporary or permanent) and no logging!
- the Kelsey-Whiskey sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!

- the East Fork Whiskey Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres.  
- the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully submitted,

Wayne L. Kelly

---

Send and receive Hotmail on your mobile device:  
<http://mobile.msn.com>

# 126

**"Cindy Hogan"**  
**<cindyhogan@hotmail.com>**

07/11/02 10:31 AM

To: or110mb@or.blm.gov

cc:

Subject: Kelsey-Whisky timber sale

Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

The Zane Grey Roadless Area should be protected as a roadless area. There

should be no roadbuilding (temporary or permanent) and no logging.

The Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected. Clearly this proposal seems to violate the spirit, if not the actual letter, of the endangered species act and the wilderness act. Allowing this area to be logged would violate the public trust that requires you to protect these lands and resources, not sell them to the highest bidder.

The East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres to more accurately account for the impact of the logging on surrounding areas.

The logging of old-growth and mature forests destroys habitat while increasing fire risk. As any beginning biology student knows, older trees tend to be more fire resistant than younger ones. I believe you have no scientific justification for logging older trees on the basis of reducing fire danger. This claim seriously undermines the credibility of your proposal.

As an Oregonian who enjoys hiking in Oregon's forests, I am dismayed that you would destroy mature forests and the habitat and watershed value they provide, and blight the landscape with more logging. Most Oregonians, I believe, would agree with me. Such proposals do not serve the public.

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,  
Cynthia M. Hogan  
1103 Pawnee Circle SE  
Salem, Oregon 97306

---

Chat with friends online, try MSN Messenger:  
<http://messenger.msn.com>

127

**"Rolf Skar"**  
**<rolf@subdimension.com>**

07/11/02 02:34 PM

To: <or110mb@or.blm.gov>

cc:

Subject: Kelsey Whisky DEIS comments

July 11, 2002

Dear Ms. Boody,

I'm writing to submit official comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale.

The DEIS states that the BLM is proposing to log native and old-growth forests in the name of fire safety. This is a mis-application of fire science, ignoring the established fact that roadless, mature and old-growth forests are much more fire-resistant than roaded, previously logged forests.

If fire safety is truly a concern, then ecological fuels reduction should be carried out by trained personnel in a method demonstrated by the Lomakatsi group near Ashland. In addition, the long-standing, extremely expensive program of fire suppression on public lands should be ended, and a program of prescribed burning should be adopted to help restore the natural balance that public land managers have corrupted.

As a member of the public and a citizen of Oregon, I call upon the BLM to immediately cancel this proposed sale. The Zane Grey Roadless Area should be protected permanently from all road building (temporary or permanent) and no

commercial logging should be allowed under any circumstances. If any road work is to be done in this area, it should be deconstruction of old roads at the perimeter of the Zane Grey Roadless Area - the 10.4 miles of road decommissioning proposed in the DEIS "preferred alternative" is a good start but should be increased.

The Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. With habitat of owls and the other sensitive species should be protected. The public owns these lands, and the public is overwhelmingly opposed to logging mature and old-growth forests - especially in our disappearing roadless areas. In order to protect sensitive habitat, the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres.

As a member of your constituency, I call upon the BLM to spend the public taxpayer funds that you propose to allocate for the Kelsey-Whisky sale instead on the scientific research needed to address the restoration of previously logged, roaded and fire-suppressed public lands.

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,

Rolf Skar  
2227 SE Madison, #6  
Portland, OR 97214

**128**

"Gerry Gold"  
<gee.cubed@prodigy.net>

07/11/02 06:29 PM

To: <or110mb@or.blm.gov>

cc:

Subject: ATTN: BLM Medford, No roads or logging within Zane Grey Roadless

TO:  
Bureau of Land Management, ATTN: Lynda Boody  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

SUBJECT: Kelsey-Whisky timber sale and the Zane Grey Roadless Area

As a volunteer trail worker who has been on the Wild and Scenic Rogue River as a summer volunteer and again as a tourist, and as a frequent visitor to southwestern Oregon, I am writing to urge you to abandon all plans to build roads or log forests within the Zane Grey roadless area, which borders the Rogue River wilderness. This magnificent area of forests, watersheds, and wildlife habitat is unique in the world and a growing destination for tourists like myself.

You have before you a Draft Environmental Impact Statement (DEIS) which, if implemented, could cause irreparable harm to the Zane Grey Roadless Area. The DEIS "Preferred Alternative" recommends road decommissioning. Please accept the "Preferred Alternative" DEIS, leave the Zane Grey Roadless Area truly roadless, and create the largest possible Area of Critical Environmental Concern (ACEC) for the East Fork Whisky Creek watershed.

Thanks for the opportunity to include my comments. Sincerely yours,

Gerard G. Gold [gee.cube@prodigy.net](mailto:gee.cube@prodigy.net)  
156 Gillingham Drive  
Newbury, NH 03255

129

"Russell Frankel"  
<[russellg@metacrawler.com](mailto:russellg@metacrawler.com)>

07/11/02 06:25 PM

To: [or110mb@or.blm.gov](mailto:or110mb@or.blm.gov)

cc:

Subject: Kelsey-Whisky timber sale

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

\* the Zane Grey Roadless Area should be protected - no roadbuilding

(temporary or permanent) and no logging!  
\* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!  
\* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres  
\* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,

Russell Frankel  
930 NW 25th Place, #410  
Portland, OR 97210

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# 130

**"Elizabeth Roberts"**  
**<lizroberts22@hotmail.com>**

07/12/02 02:24 AM

To: or110mb@or.blm.gov  
cc:  
Subject: important

Dear Ms. Boody,

I'm writing to submit official comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale.

The DEIS states that the BLM is proposing to log native and old-growth forests in the name of fire safety. This is a mis-application of fire science, ignoring the established fact that roadless, mature and old-growth forests are much more fire-resistant than roaded, previously logged forests. If fire safety is truly a concern, then ecological fuels reduction should be carried out by trained personnel in a method demonstrated by the Lomakatsi group near Ashland. In addition, the long-standing, extremely expensive program of fire suppression on public lands should be ended, and a program of prescribed burning should be adopted to help restore the natural balance that public land managers have corrupted.

As a member of the public and a citizen of Oregon, I call upon the BLM to immediately cancel this proposed sale. The Zane Grey Roadless Area should be protected permanently from all road building (temporary or permanent) and no commercial logging should be allowed under any circumstances. If any road work is to be done in this area, it should be deconstruction of old roads at the perimeter of the Zane Grey Roadless Area – the 10.4 miles of road decommissioning proposed in the DEIS "preferred alternative" is a good start but should be increased.

The Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. With habitat of owls and the other sensitive species should be protected. The public owns these lands, and the public is overwhelmingly opposed to logging mature and old-growth forests – especially in our disappearing roadless areas. In order to protect sensitive habitat, the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres.

As a member of your constituency, I call upon the BLM to spend the public taxpayer funds that you propose to allocate for the Kelsey-Whisky sale instead on the scientific research needed to address the restoration of previously logged, roaded and fire-suppressed public lands.

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,

Elizabeth Roberts

4045 SE Grant Street

Portland, OR 97214

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# 131

**"john yoakum"**  
**<yoakum@moose-**  
**mail.com>**

07/12/02 09:28 AM

To: or110mb@or.blm.gov

cc:

Subject:

From: John Yoakum  
614 SW Jackson #204  
Portland, OR 97201  
Jul 12, 2002

To: Lynda Boody  
Bureau of Land Management  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504

Ms Boody,  
Science shows that roadless, mature and old-growth forests are more fire-resistant than forests that have been logged, roaded and "managed." Because of this I'm opposed to the "Kelsey Whiskey" timber sale. Cutting on BLM lands (and all federal lands) needs to be restricted to restorative forestry, that is areas already cut and replanted. These areas have young stands of trees that are overly dense and much more susceptible to fire. There are enormous areas with 15 to 35 year old trees that must be thinned to reduce fire hazards. Logging old-growth and in roadless areas will, over time, increase fire danger. Please remove the "Kelsey Whiskey" timber sale from consideration.  
thank you,  
John Yoakum

john

Will antibiotics work in 20 years?  
End the misuse of Antibiotics:

<http://www.care2.com/go/z/1425>

**francis**  
<francise@internetcd  
s.com>

07/12/02 10:59 AM

To: or110mb@or.blm.gov

cc:

Subject: Kelsey Whisky DEIS Comments

Medford BLM:

Could you reply to this email to confirm that you received it. Please pass this email on to Lynda Broody. Comments on this DEIS are due today. Please accept these email comments. A hard copy will not follow unless you request it.

Thank you

-----

Wednesday, July 12, 2002

BLM, Medford District  
3040 Biddle Road  
Medford, Oregon 97504

Attention Sherwood Tubman, Ecosystem Planner  
Glendale Field Office

**RE: Kelsey Whiskey Timber Sale, DEIS**

Dear Lynda Broody

Umpqua Watersheds' members use and enjoy the Zane Gray roadless area, just over the hill from our watershed. We are concerned with the logging you have proposed in native, mature, and roadless forests as well as the surrounding area.

We support the hazardous fuels reduction with prescribed burning, but we do not support commercially logging large trees in the name of fire prevention. You must recognize that big trees are not the problem -- it is the small trees that you need to cut for fire risk reduction.

The scoping comments you received on this project asked you to fully protect roadless areas and older, mature, old-growth forests. Yet you did not develop an alternative that includes all of these protections. The DEIS must be re-done to include the most significant issues the public has identified. NEPA requires that you consider public scoping in the development of alternatives.

There is only one Zane Grey roadless area, and it is under your care. You must not degrade it in any way on your watch. We will never get another pristine, unlogged, roadless forest in the Zane Grey area again. Once your preferred alternative commercializes parts of it, it is all gone forever. This is an irreversible commitment of a valuable and rare resource (an unroaded, unlogged forest) that must be fully analyzed in the EIS. If you could bring yourselves to actually propose logging here, you must fully consider the permanent loss of this valuable resource to all future generations.

Once you convert a previously unlogged, native forest into a tree plantation, we have lost that forest forever. You will never allow it to become an old forest again, as you will continually mine it for wood fiber on a rotational basis. Instead, the BLM should focus on thinning the many acres you have already converted to tree-plantations, instead of converting more.

Please withdraw the DEIS, and issue another one that has a clear alternative to reduce fire potential without building any roads or helicopter landings, without logging older or bigger trees, without regeneration harvests, and without degrading Spotted Owl critical habitat. Please decommission more than 10.4 miles of road -- you built too many in the past and you should pay for this now.

Please protect the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) with more than the 2,844 acres it deserves.

Most importantly, please listen to the public when they ask you to manage our land in the best interest of the majority public and the wildlife that live there, not for the few private companies who would like to profit from our land.

Thank you for fully considering these comments in a new DEIS.

Francis Eatherington  
Umpqua Watersheds, Inc.

541-673-7649; [francise@internetcds.com](mailto:francise@internetcds.com)

please send responses to:  
886 Raven Lane, Roseburg, OR 97470

**Don Schuman**  
**<Donangelo@inetare**  
**na.com>**

07/12/02 11:23 AM

To: or110mb@or.blm.gov  
cc: peter.defazio@mail.house.gov  
Subject: Kelsey-Whisky

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

- \* the Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!
- \* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!
- \* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres
- \* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,

Don Schuman

I urge Representative DeFazio to:

- 1) Protect the Zane Grey roadless area by preserving it as congressionally-designated Wilderness.
- 2) Seek protection for the larger Siskiyou Wild Rivers area as a National

Monument to permanently protect the wild rivers, fish and heritage of the area for Oregon's future.

# 134

**sarah damsell**  
**<sarahdamsell@yahoo.com>**

07/12/02 11:54 AM

To: or110mb@or.blm.gov

cc:

Subject: message from forest lover

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

- \* the Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!
- \* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!
- \* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres
- \* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,

Name:sarah damsell

Address:p.o. box 338 trout lake wa 98650

---

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<http://sbc.yahoo.com>

# 135

**"Marion Warfield"**  
<maemoon13@hotmail.com>

07/12/02 01:19 PM

To: or110mb@or.blm.gov

cc:

Subject: Kelsey-Whisky Timber Public Forest Giveaway

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

- \* the Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!
- \* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!
- \* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres
- \* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully, *Marion Warfield*

Name: Marion Warfield

Address: 10238 N, Leonard St. Portland, OR 97203

# 136

**Scott Vasak**  
<svasak@ccountry.net>

07/12/02 03:09 PM

To: Lynda\_Boody@or.blm.gov

cc:

Subject: Comment Re Zane Grey

Dear BLM Staff

As a concerned member of the public of the U.S.A. I want to share the following about the proposed timber sale on the Zane Grey Roadless Area and adjacent lands.

Unroaded areas and ancient forests are becoming more and more rare in the U. S. These areas and forests should be kept as they are, sequestering carbon, providing plant and animal habitat, and providing protection for the watersheds that they inhabit.

I am asking the BLM and its representatives to move briskly to the task of restoration of our forests rather than carving them into logging units that are too often sold at a net loss. I do not want the public's forests managed that way. Restoration creates jobs and does move in the direction of real forest health. There is also evidence that fires do not burn as intensely in old forests as they do in younger plantations.

I further advocate that there be no more logging in Northern Spotted Owl Critical habitat, and that "regeneration" harvests of older forests be halted. I am also in favor of the East Fork Whisky Creek ACEC being comprised of the full 2,844 acres.

Thanks very much for considering my comments.

Please acknowledge receipt of this e mail.

Scott Vasak

# 137

**"Guy Prouty"**  
**<guyprouty@msn.com>**  
**m>**  
07/10/02 04:34 PM

To: <or110mb@or.blm.gov>  
cc:  
Subject: Kelsey-Whisky Timber Sale

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

- \* the Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!
- \* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!
- \* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres
- \* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,

Guy Prouty, Ph.D  
408 Hunsaker

Eugene, Oregon 97404

# 138

**aligator**  
<aligator@mind.net>

07/10/02 04:37 PM

To: OR110MB@OR.BLM.GOV

cc:

Subject: Zane Grey Roadless Area!

To whom it may concern,

I am furious to learn that the BLM plans to log in the Zane Grey Roadless area.

€ The Zane Grey Roadless Area should be left alone – No Roads and No Logging. € The BLM should cease logging spotted owl critical habitat. Spotted owls, salmon and other wildlife that depend on older forests can't tolerate more habitat destruction. € Regeneration cutting (a.k.a. clearcutting) of older forests increases fire hazards. No logging of big,

old trees. € The East Fork Whisky Creek ACEC should include the full 2,844 acres. € The 10.4 miles of road decommissioning proposed in the DEIS "preferred alternative" is a good start but should be increased.

Please note that I have spent much time in the area kayaking, rafting, and hiking up the side creeks. This place should not be logged.

Thanks for your time,  
Alice Di Micele

\*\*\*\*\*  
\*\*\*\*\*

"May I Be Kindness. May I be patience and hope. May I be healing. Even my enemies I will give my love." (chorus to "Promise Of The Sun")

my website is at <http://www.alicedimicele.com> Check it out!

\*\*\*\*\*  
\*\*\*\*\*

# 139

**Christine Perala**  
**<perala@pacifier.com>**

07/10/02 05:08 PM

To: or110mb@or.blm.gov  
cc:  
Subject: Kelsey-Whisky timber sale

Dear Ms. Boody,

I'm writing concerning the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale.

The DEIS clearly states that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area, in the name of fire safety. This is a mis-application of fire science cloaking out of date clear-cut logging policy, and an astonishing appropriation of public money

for private gain. This theft of public resources violates federal standards and is a betrayal of the public trust. Logging the Zane Grey roadless area for timber "harvest" is like melting down the Statue of Liberty for scrap metal.

As a member of the public and a citizen of Oregon, I call upon the BLM to halt this sale at once. The Zane Grey Roadless Area should be protected permanently from all road building (temporary or permanent) and no logging should be allowed under any circumstances. If any road work is to be done in this area, it should be deconstruction of old roads at the perimeter of the Zane Grey Roadless Area. If fire safety is truly a concern, then ecological fuels reduction should be carried out by trained personnel such as the Lomakatsi group has demonstrated near Ashland.

The Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and the many other sensitive species should be protected. If the BLM is concerned about increasing logging yields, there are thousands of acres of BLM land in need of thinning for fuels reduction - witness the fires in Colorado and Arizona this summer as evidence of not implementing fuels reduction in regrown clear cut forest lands.

The East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres. As a member of your constituency, I call upon the BLM to stop all logging of native, old growth, late seral forest. We need these few remaining stands to conduct the scientific research to understand how mature forests function. Please spend the public taxpayer funds that you propose to allocate for the Kelsey-Whisky sale instead on the scientific research needed to address recovery of mature forest from clear cut regrowth forest lands.

Thank you for considering my comments. I believe that every effort must be

made to protect the native forests, roadless areas and watersheds of the Siskiyou Wild Rivers area.

Respectfully,  
Dr. Christine Perala  
WaterCycle Inc  
34969 Skogan Rd  
Sandy Oregon 97055  
503.826.1839

# 140

**"Adrienne Sturbois"**  
**<adrienne@nwei.org**  
>

07/10/02 05:10 PM  
Please respond to  
adrienne

To: <or110mb@or.blm.gov>

cc:

Subject: Mining in Kelsey-Whiskey timber sale

Dear Ms. Boody,

These are my comments on the Draft Environmental Impact Statement for Mining for the Kelsey-Whisky timber sale. I am outraged that the BLM is proposing to log in native and old-growth forests in the Zane Grey roadless area.

I believe that:

- \* the Zane Grey Roadless Area should be protected - no roadbuilding (temporary or permanent) and no logging!

- \* the Kelsey-Whisky sale would degrade 1,259 acres of Northern Spotted Owl habitat. The habitat of owls and other sensitive species should be protected, not logged!

- \* the East Fork Whisky Creek Area of Critical Environmental Concern (ACEC) should include the full 2,844 acres

- \* the logging of old-growth and mature forests destroys habitat while increasing fire risk - no more native/old-growth logging!

Thank you for considering my comments. I believe that every effort must be

made to protect the native forests, roadless areas and watersheds of the

Siskiyou Wild Rivers area.  
Respectfully,

Adrienne Sturbois  
3142 N. Portland Boulevard  
Portland, OR 97217  
503/283-4135

# 141

**Cheyne Cumming**  
<[cheynec@yahoo.com](mailto:cheynec@yahoo.com)  
m>

07/10/02 09:29 PM

To: [or110mb@or.blm.gov](mailto:or110mb@or.blm.gov)

cc:

Subject: Stop Kelsey Whiskey timber sale now

Please put a stop to the Kelsey Whiskey timber sale. I am a voter and a taxpayer and do not want the logging of old growth trees to continue. I have grandchildren that I want to have the opportunity to know what a forest is. Do not build roads in this area.

Thank you for listening and hopefully heeding my plea.  
Sincerely,  
Cheyne Cumming

---

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<http://sbc.yahoo.com>

# 142

**wilbec4@aol.com**

07/10/02 10:36 PM

To: [or110mb@or.blm.gov](mailto:or110mb@or.blm.gov)

cc:

Subject: Kelsey-Whisky Timber Sale

Please do not allow the logging of this rare area. Clear cutting is not sustainable to the environment OR to loggers jobs. We only get one chance to

make the right choice. What will be destroyed will not and cannot be rebuilt.

I may not have your level of education or income, but I've studied at the New York Botanical Garden School of Horticulture. This area is complex and valuable in terms that do not include money. Thank you for your time. Rebecca P. Wilmore.

# 143

**"Ogden Kellogg Jr"**  
**<cindraog@connpoint.net>**

07/12/02 03:26 PM

To: <or110mb@or.blm.gov>  
cc:  
Subject: Zane Grey roadless area

I wish to comment on the Kelsey-Whiskey DEIS. I have reviewed this document, and find it lacking in certain key ways. The Zane Grey roadless area is one of the best loved and most visited unprotected wilderness areas in the entire United States. The DEIS should put the wilderness values of the Rogue River canyon first. No action should be taken which would reduce the size of the Zane Grey roadless area. Eventually, the Zane Grey roadless area will almost certainly be added to the Wild Rogue Wilderness. This is important. Please don't mess up!

Thanks for listening.

Ogden Kellogg  
3444 Upper River Road  
Gold Hill, OR 97525  
541-855-7373

# 144

**Larry Laitner**  
**<llaitner@mind.net>**

07/12/02 03:59 PM

To: or110mb@or.blm.gov  
cc:  
Subject: Comments on Kelsey Whisky DEIS

These comments are submitted for Riverhawks and represent the consensus of the Riverhawks members.

Riverhawks is opposed to any decision that includes any clearcutting (regeneration harvest) in the Rogue River canyon. We also are opposed to any severe logging that is disguised as "thinning". The DEIS fails to adequately consider the long term effects of clearcutting on the potential for catastrophic fires in the Rogue canyon. The DEIS also fails to adequately consider the cumulative potential for sedimentation as a result of the logging that is proposed in the DEIS as well as the sedimentation that might result from the intense fires that might be expected with the young even aged stands of timber that will follow the clearcutting.

We suggest that there is a potential plan that would allow forest health to be improved without stripping the forest of its large trees either in "regeneration harvests" or "commercial thinning". Since the BLM has not presented such a plan we have no alternative but to support the no action alternative. If some modification was made to proposal 4 to address some of the above concerns, Riverhawks might support many of the components of proposal 4.

Submitted for Riverhawks by  
Larry Laitner  
801 Pinecrest

Ashland, OR 97520