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November 15, 2007

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BLM, WOPR Office
333 SW 1st Ave.
Portland, OR 97208

Dear BLM,

This letter is to register my comments on BLM's WOPR. After reading much of the 1600+ pages of the WOPR DEIS, my first comment is this:

- **Public Comment Deadline:** There is far too much information contained in the WOPR to be deciphered and responded to by concerned Oregonians by the (new) January 11th public comment deadline. This deadline needs to be extended at least until May 2008 when the US Fish & Wildlife Spotted Owl Recovery Plan is expected to be available.

Further comments:

- **Watersheds:** BLM owns 704 miles of stream listed as "water quality impaired" under Section 303d of the Clean Water Act. Alternative 2 of the WOPR will negatively impact these already impaired streams by 1) reducing riparian buffers to 100 ft. and allowing logging within 25 ft. of banks; 2) allowing yarding corridors in Riparian Management Zones; 3) eliminating intermittent stream buffers; 4) adding up to 1000 miles of roads.
- **Carbon Sequestration:** Even George Bush has finally conceded that climate change is a reality. Forests are vehicles for carbon sequestration. While some timber-industry-generated research claims a 45-year rotation is optimal for this purpose, other research¹ shows that mature and old-growth forests are the most efficient carbon sinks – not to mention that these forests continue to produce oxygen long after the 45-year stands are harvested, and that the salvage logging advocated in Alternative 2 reduces the carbon-sequestering potential of forests.
- **Fire Hazard:** Alternative 2 creates an unacceptably large area of high fire-severity stands, creating large areas of even-aged plantations that are susceptible to crown fire.
- **Old Growth logging:** Alternative 2 approximately doubles logging of Oregon's rare old-growth forests and eliminates it over a decade, and reduces LSRs by 47%. This will unnecessarily and negatively impact endangered species habitat, recreation, and tourism in Western Oregon.

¹ Harmon, M.E. et al, (2004) Production, respiration and overall carbon balance in an old-growth Psuedotsuga/Tsuga forest ecosystem. Ecosystems 7:498-512, and Krankina, Olga and Mark harmon, (2006), Forest Management Strategies for Carbon Storage, Forests, Carbon and Climate Cahnge, Oregon Forest Resources Institute

Rep. Greg Walden
Rep. David Wu
Rep. Earl Blumenauer
Rep. Peter DeFazio
Rep. Darlene Hooley

Gov. Ted Kulongoski

² Ince, Peter, Albert Schuler, Henry Speller, William Luppold, 2007, "Globalization and Structural Change in the U.S. Forest Sector"