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20 December 2007,

Western Oregon Plan Revision  
PO Box 2965  
Portland, Oregon 97208

Dear BLM Planners,

I am proud to have spent the vast majority of my life in the Pacific Northwest; my experiences growing up in the shadow of the forests of the Oregon coast range helped guide my education and career. I have earned both a masters and Ph.D. in ecology, have taught biology and ecology for more than 8 years in k-12 and university classrooms, and currently work as an ecologist here in Oregon. I am asking you to **oppose the preferred option of the Western Oregon Plan Revision and halt present plans to overturn the Clinton Forest Plan in Oregon.** The proposed new action on the part of the Bureau of Land Management would reinstate clear-cutting of old growth trees in Forest and Riparian Reserves in Western Oregon. The Clinton Plan was a compromise that allowed a certain level of tree harvest, and established Reserves in sensitive areas such as headwaters of creeks and ancient forests. Even before the Clinton-Gore plan was hammered out, 90% of Western Oregon's old growth had already been felled. Our forests, their unique floras and animal inhabitants, and our streams, cannot withstand more clear-cutting of the kind described in the BLM's WOPR.

My close study of the BLM plan reveals that under the Preferred Alternative, heavy clear-cutting would take place in Old Growth Preserves and Riparian Reserves in the Oregon Cascades and Coast Range. Several examples:

**(1) Salem District Summary (Includes Corvallis):**

- BLM Late Successional Preserves would drop from the present 54% of the base to 23 % under WOPR. Land removed from Preserve status would be available for clear cutting. "Timber Management" areas would increase from 13% to 44% of the forest base.
- Near Corvallis, much of the old growth harvest, under BLM's Preferred Plan would occur near Mary's Peak, the most popular forest recreation site in Benton County.
- In the Coast Range west of Salem, many of the BLM Adaptive Management Areas would be slated for clearcutting. These areas are in the Yaquina, Siletz and Salmon River headwaters.
- Virtually all BLM Old Growth Reserves would be eligible for cutting in the Cascades east of Salem and Corvallis in Clackamas, Marion, and Linn Counties. Near Salem, the Walker Flat Area of Environmental Concern (ACEC), site of the Federally Threatened wildflower, Nelson's checkermallow, could be clear cut.

**(2) Eugene District Summary:**

- Lane County's protected old growth forests on BLM land would drop from 44% of the base to 26%.
- Many of the BLM O&C holdings in Lane County are in the Coast Range in the headwaters of the Siuslaw River. A second area of Lane County that would be heavily affected would be in the Western Cascades near the town of Marcola in the headwaters of the Mohawk and McKenzie Rivers. Also vulnerable would be fragile ecosystems in the Coburg Hills, home to rare ecosystems and plant communities.

- Also slated for clearcutting would be BLM lands in southern Lane County near the border with Douglas County near Bohemia and Fairview Mountains with their well-known unique floras.

**(3) Coos Bay and Roseburg Summary:**

- BLM old growth protection in the Roseburg District would drop from 44% to 31%.
- Both the Coast Range and the Western Cascades would be affected, with the greatest impact in the Coast Range.
- Near Coos Bay, protection would drop from 39% to 17%, and clear cutting would increase on BLM holdings in the Smith River drainage, specifically in Riparian Reserves.

**(4) Medford District:**

In the Medford District, BLM old growth protection would drop from 24% to 10% of the base.

**Conclusion:**

The non-profit, educational Native Plant Society of Oregon (NPSO) of which I am a member, has published a detailed Forest Policy which is available online at [www.npsoregon.org/pos/fore.htm](http://www.npsoregon.org/pos/fore.htm). It states in part: "Approximately 90% of our Westside old growth forests have been cut ... NPSO advocates protection of all remaining Westside old growth forests in reserves..." The BLM's current proposal, if instituted would overthrow the careful study that went into the Clinton Plan and do irreparable harm to Oregon ecosystems. Due to the Bureau's management practices, once felled on BLM land, our Old Growth forests and riparian areas, along with their associated ecosystems, would be gone forever. In addition, increased cutting activities would require an increased the number and use of roads through forested areas. It has been well established that roads are essentially "highways" for invasive weed species, which are already a threat that the BLM spends vast amounts of money trying to fight. Increased amounts of weeds will not only increase the cost to the BLM, but will also contribute to degradation of the few areas that are not harvested.

**Please abandon your unscientific and illegal new plan, and instead protect all Forest and Riparian Reserves established by the Clinton Plan.**

Yours sincerely,



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