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January 7, 2008

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Bureau of Land Management
Western Oregon Plan Revisions Office
333 S.W. 1st Avenue
Portland, OR 97208

Re: Western Oregon Plan Revisions (WOPR)

This revision is totally at odds with recent science regarding old-growth forests in the Pacific Northwest. What remains of this vital temperate forest is severely fragmented and deserves to be protected for its inherent values which include: clean water, viable soils, wildlife and carbon sequestration. The forest canopies provide cool shading for diverse botanical plants. Many of the proposed logging areas have not been subject to "ground truthing," to check for unstable soils and rare biological phenomena which inhabit these areas. Converting these areas into commercial tree farms will destroy thousands of years of cumulative biological diversity. The soils in these areas contain more bio-mass than tropical forests and deserve protection.

Reducing the forest buffer zones along forest streams will inevitably destroy the values of the streams, which include clean water for fish habitat, and other biological organisms. It is imperative that the 200-300 foot buffers remain intact, and not be reduced to 25 feet as proposed. Clearcutting these last remnants of the Pacific Temperate Forest will also add to serious negative global warming effects on already stressed ecosystems. Converting forests which contain trees which are 200+ years old into tree plantations which contain 0-40 year-old trees will only contribute to global warming, in addition to destroying plant and animal communities. These forests will never be allowed to grow back into their original age classes, since they will be harvested increasingly at very young ages. We will also see an increase in noxious plants and organisms which will require an increase in chemical use to control. These invasives are totally out of control of landowners at the present time, and will only increase if forests are clearcut.

Clearcutting itself is an inherently destructive way of harvesting trees. Research at the University of Washington has clearly shown that Douglas Fir and other species can be grown under shady conditions, albeit somewhat slower than with clearcutting. Please consider taking clearcutting options off the table for all native forests under BLM management. Although the options considered under WOPR would benefit a small minority of timber communities and communities which benefit directly from forest logging, overall the activity is highly destructive and non-beneficial to the larger communities within Oregon. Please consider no implementation of this plan.

Thank-you for considering my comments.

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cc: file, Senators Wyden, Smith; Rep. DeFazio, Blumenhauer, Hooley, Wu