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January 11, 2008

Edward W. Shepard, State Director
Bureau of Land Management
Western Oregon Plan Revisions
P.O. Box 2965
Portland, Oregon 97208

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REF: Western Oregon Plan Revision-WOPR

I am submitting the following comments out of concern for the watershed in which I live. The Bureau of Land Management plan that has been developed (the WOPR) would drastically increase the logging of the old growth forests on the federal lands it manages in Oregon. The WOPR would also increase the extent of invasive species in our watershed and narrow the protection around our creeks and streams. BLM has also chosen to ignore climate change and global warming, even though deforestation is a major contributor to carbon in the atmosphere.

OLD GROWTH FOREST AKA Late Successional Reserves: BLM fails to admit that the remaining old growth forest ecosystem under its jurisdiction is THE endangered species and in need of greater protection, not greater threat. The threatened and endangered animal and plant species such as the spotted owls, marbled murrelets and hundreds of other plants and animals all depend on the old growth ecosystem for their survival. To remove any more of our forest's old growth trees would be an environmental loss of significant proportion and endanger all the old growth dependant flora and fauna.

INVASIVE SPECIES: For over ten years my watershed council, the Mohawk Watershed Partnership, has worked with landowners to prevent and control the spread of invasive plant species. The increased levels of forest activity among all of the proposed management alternatives will lead to the increased spread of invasive species and possibly to use of increased levels of herbicides. Such results would be counterproductive to the efforts of watershed councils which have spent thousands of dollars and thousands of hours controlling invasive plant species.

NARROWING OF RIPARIAN ZONES: Council staff and volunteers have also been working with landowners for over ten years to restore riparian areas, and increase water quality for both fish species and humans. The WOPR ignores the cumulative risks posed by increased harvest-related activity in these zones. These risks include sedimentation impacts, peak flows, the provision of woody debris, the loss of shade and subsequent heating of water and the introduction of pollutants via surface run-off. The proposed riparian zone distances in each of the alternatives also do not factor in the risks associated with machinery and other operator errors, seasonal shifts in stream channels and the width of riparian zones in adjacent properties.

CLIMATE CHANGE: The BLM analysis also assumes no change in climate conditions and does not factor in global warming which is a huge gap in its planning efforts. Logging disturbs the soil and releases carbon into the atmosphere. These large forest stands sequester carbon. The entities who are concerned about the loss of federal dollars from smaller harvests should be looking at ways to generate income from carbon offset credits instead of from logging. This would benefit our watershed as well as the rest of the country.

COMMUNITY COLLABORATION: The BLM preferred alternative reverses the hard work that watershed councils have undertaken to reverse the harmful effects of deforestation, including working on the elimination of invasive species and restoration of riparian areas.

Sincerely,

Diane Albino
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