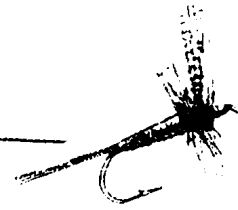


McKENZIE FLYFISHERS

P.O. BOX 10865 • EUGENE, OREGON 97440-2865



January 2, 2008

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TO ENCOURAGE FLYFISHING
AS A METHOD OF ANGLING

JAN 07 2008

Edward W. Shepard, State Director
United States Department of the Interior
Bureau of Land Management
Western Oregon Plan Revisions
P.O. Box 2965
Portland, OR 97208

Dear Mr. Shepard:

The McKenzie Flyfishers, a fishing and conservation club of 120 members in the Eugene-Springfield area, wishes to strongly oppose the BLM's Western Oregon Plan Revision (WOPR) Preferred Alternative, and to state our preference for the No Action Alternative.

We are particularly concerned about the threat to water and fish resources posed by the WOPR Preferred Alternative. You are doubtless aware of the criticism of that alternative from the Environmental Protection Agency, in its letters to the U.S. Fish and Wildlife Service (see Eugene Register-Guard, Oct. 17, 2007, pp. A1, 7). We join in the EPA's concern about the harm to rivers and streams and imperilment of fish from increased logging. We call your attention to the scientific peer reviews strongly criticizing the WOPR plan for its potential harm to endangered species and water quality. We urge that the analyses of impacts be reviewed by a reputable independent scientific organization.

We further note that all riparian area management zones in the WOPR EIS are reduced in size from those in the current (No Action Alternative) status. This is a major mistake, since these riparian reductions will result in harmful watershed impacts (sedimentation, peaks flows, woody debris, loss of shade and subsequent heating of waters, greater intrusions of pollutants in surface runoff, etc.). All of these pose significant risks from increased harvesting in these zones, which must be coupled with additional threats from machinery and other operator errors, seasonal shifts in stream channels, and width of riparian zones in neighboring properties.

We are also deeply concerned, in a future in which global warming threatens water quantity and quality, about the deleterious effects from increased logging of old growth forests, one of the best sources and conservers of cold, pure water for its slow and gradual release into our streams and rivers. We are amazed that there is no recognition in the WOPR models of global warming, and no plans to address its looming problems, as they relate to forests and waters.

As for the importance of old growth to water and fish, it must be recognized that ninety per cent of the old growth forests that covered western Oregon two centuries ago has been cut down. Most of the ten per cent that remains was set aside for permanent protection by the Northwest Forest Plan in 1994. Now, the Bureau of Land Management seeks to log much of this last bit of old growth. The WOPR preferred alternative would circumvent the Northwest Forest Plan by allowing massive logging of old growth and mature forests on Oregon BLM lands, permitting a 700 per cent increase in logging Oregon's last BLM old growth forests. Lane County's protected BLM old growth reserves would be cut nearly in half. Statewide, 24 per cent of logging under

the BLM's preferred plan would target trees 200 and more years old. Over 200 square miles of mature and old growth forests would be clearcut.

Once old growth forests are gone, they are gone, in effect, forever. The ecological conditions of an old growth forest take up to a thousand years to develop. Once logged, old growth lands are simply added to the previously logged lands which become, in effect, tree plantations or tree farms, designed to be harvested over relatively short periods of time. No one is prepared to wait for a millennium while a clearcut old growth stand attempts to regenerate itself. And the disappearance of old growth will promote increases in noxious weeds and invasive species which old growth resists, but which move in after a clearcut. Also, with indisputable global warming now occurring, moisture-holding old growth forests, like giant water-holding sponges, will be increasingly important, as they are less susceptible to the dryness and flammability of stands of plantation trees.

Rather than pursuing an ultimately disastrous policy of logging our old growth preserves for a short-term jump to the economy, we need a sustainable plan for the future. The BLM and the federal agencies involved should be actively engaged in thinning the overstocked second and third growth public timber lands. Such thinning and better management on these previously logged lands could provide an estimated two billion board feet of marketable timber. The Siuslaw National Forest, in its collaboration with loggers, local governments, conservation groups, and others, presents an example of how to provide large amounts of wood for local mills without cutting old growth forests. Studies reveal that most Oregonians favor preservation of old growth forests and thinning of previously logged forests.

Perhaps most important of all, old growth preserves are crucial for providing the conditions which we most value in western Oregon. These conditions are directly related to our club's commitment "to protect and increase the fishery resources." Old growth forests are the indispensable anchor to our clean, clear rivers, streams, and lakes. Old growth is a permanent benefit to the region's people and plants and animals—including endangered salmon and other species. These stands of old trees are essential to our recreational and aesthetic needs, to the beauty and health which we think of as Oregon's core meaning, the deepest appeal of Oregon as a unique place.

Thus, we, the McKenzie Flyfishers and their Board of Directors, must urge the No Action Alternative, and the rejection of the BLM's Preferred Alternative.

Sincerely,



Glen Love, Conservation Committee, McKenzie Flyfishers
PO Box 10865
Eugene, OR 97440

cc: local, state, and federal officials