1145

November 25, 2007

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

NOV 28 2007

Re: BLM Western Oregon Plan Revisions

Dear BLM:

I am a businessman living in Eugene, Oregon. I wish to comment on the changes contemplated in the management of nearly 2.6 million acres of federal forests under the Western Oregon Plan Revisions. The changes, which roll back the protections of the Northwest Forest Plan, will have many adverse impacts on our region. However, I want to comment in particular on the effects the plan will have on the regional water cycle and water quality.

As you know, the Plan Revisions would place half of the public land that the BLM manages - and most of the best old-growth BLM forests - in "Timber Management Areas" to be clearcut every 80 years. The Administration's preferred alternative proposes to clearcut 110,000 acres of Oregon forests that are greater than 120 years of age, reduce or eliminate stream buffers, and build 1,000 mile of new logging roads every decade while creating over 100,000 miles of new Off Highway Vehicle Emphasis Areas.

Others have doubtless noted that the WOPR puts water quality at risk by reducing stream buffers and exposing soils to erosion into runoff from clearcutting, road building, and off-road vehicular activity. Increased risk of landslides as a result of clearcutting also puts water quality, and human lives, in danger. But I want to draw attention as well to the longer-range effects that the Plan Revisions would have on the local and regional water cycles.

Clearcutting of large areas of mature forest sharply reduces the ability of the affected lands to retain water, both in soil and vegetation. With less water held on the land, the temperature of the atmosphere above the affected areas tends to rise, forcing precipitation to higher elevations, where less of the total can be effectively absorbed.

Thus, water that formerly was recycled benignly in the ground and in vegetation at lower elevations now will flow rapidly into streams at higher elevations. One result is episodic flooding downstream, with obvious negative impacts on water quality and human settlement. In addition, on a longer timescale, there is net drying of the land over broad areas as more water moves to the ocean with less retained by the land. Such drying threatens the health of the remaining forested lands, increases the risk of catastrophic fires, and reduces the productivity of all timberlands.

Increasing the area devoted to roads, and that used by Off-Highway-Vehicles, will similarly reduce the ability of the land to absorb and cycle water, as a result of soil compaction, loss of topsoil, and removal and loss of vegetation.

The Plan Revisions will also negatively impact regional climate regulation, as drying of the land exacerbates atmospheric heat flows. (Water, it should be remembered, has the highest heat capacity—ability to absorb and retain heat—of any natural substance.) In addition, the capacity of the land to retain carbon and keep it out of the atmosphere is directly related to the capacity of the land to hold water in soil and vegetation.

Consequently, it is imperative at this time to protect our remaining mature forests, focus active management of BLM lands on already logged-over areas, and promote projects such as restoration thinning that benefit watersheds, conserve and protect soils, and maintain the water retention capacity of mature forests.

Sincerely,

Randall Rush Wayne, Ph.D.
2720 Onyx St.
Eugene, OR 97403

CC: Oregon Congressional delegation