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Bureau of Land Management Western Oregon Plan Revisions Office P.O. Box 2965 333 SW 1st Avenue Portland, Oregon 97208 (Electronically mailed to: <u>orwopr@or.blm.gov</u>)

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Re BLM Western Oregon Plan Revisions (WOPR)

To BLM,

I live in South Western Oregon and I oppose BLM's latest plan for the management of O&C BLM forests: the Western Oregon Plan Revision (WOPR). I oppose all the Alternatives of the WOPR with clear cutting or logging on any old growth BLM forests. I support the No Action Alternative. By old growth, I mean tree stands aged 150 or more years. Truly old forests are gone, those 750 - 1200 years old - the true life span of the oldest Douglas Firs (Maser 1990). Remnant stands of BLM forests with older trees need to remain unlogged - preserved so they can return to truly ancient forest ecological characteristics in future. Responsible BLM management would selectively thin overly dense younger tree plantations, resulting in the beneficial decrease of wildfire danger to all of us in the surrounding communities, unlike this WOPR plan to increase the cut of fire-resistant, old growth forests. The WOPR plan needs to be scraped and the North West Forest Plan itself needs strengthening and improvement. We need to *restore and reconnect* the fragmented stands of Old Growth, *not increase* the old growth cut, which the WOPR aims to do.

I walk out the door of my cabin in woods 15 miles outside Roseburg, a timber industry town surrounded by both private and BLM publicly owned land, into the forests nearby, and overwhelmingly find cut forests, growing back from at least 2 or 3 previous loggings. The great Pacific Northwestern American forests of huge trees are rare now. Except for one tiny map-error stand with big trees nearby, I must get specific directions and drive long distances to find truly huge trees. Most old growth stands I've seen are fragments, small areas of large trees surrounded by far younger, logged forests. There is little Old Growth forest I can easily reach; most giants are long since harvested. Old growth's overwhelming replacement by young tree plantations robs Oregonians and all American citizens of its ecological services: clean water and air, wildlife and fish habitat, its reservoir of plant, fungal and animal diversity, fire-resistant old trees and puts us in far greater fire danger.

I wish I could visit huge areas of truly old forests with their whole ancient ecosystem intact, with all their grandeur of size, beauty, diversity of plants and animal species, riches of fungi and microbes, their quiet open slowness. A large presence of such neighboring ancient forests, conserving the Earth's well being in my neighborhood, would ease my heart and give me hope for future generations. Even our tiny fluke 300ft wide strip of old growth lifts my spirit and likely my neighbor's too: I meet them on horseback when I'm walking there. Although their family has been supported by logging, they seem to especially like that tiny bit of BLM old growth for riding, enjoying as I do the few huge trees, open forest floor, and quiet grandeur. Yet even this tiny fragment will be logged by the WOPR, since uses like recreation or ecological services of clean air and water carry little value compared to timber extraction. Our stream is muddy now, likely due to logging clear-cuts up the valley, and this year salmon haven't appeared. Our accidental fragment of old growth – tiny as it is - can't alone protect our stream or fish.

Large areas of continuous Old Growth are needed to preserve the Old Growth ecosystem. However, even the Northwest Forest Plan, which is relatively benevolent compared to the WOPR, is seriously flawed. On field trips to look at BLM forest land designated "Late Successional Reserve" (LSR), I've found to my shock that **these "LSRs" have been clear-cut in the last 2 or 3 decades and** *will only grow into LSR ecological functions in 150 years - 200 years*! Yet these so-called "LSRs" are still counted on paper as "protected LSR acres" under the Northwest Forest Plan! This is not conservation. By twisted terminology, the BLM claims to be preserving old growth characteristics, while only planning to implement future management, not current conservation of Old Growth Forests! This is the BLM's practice under the current Northwest Forest Plan already in place. The WOPR is a much worse plan, a fatal step to rob Americans of their last remnant heritage Old Growth Forest on a continent once rich but now impoverished in natural forests.

This false BLM terminology, designating recent clear cuts as "LSRs", is breaking trust by an official government agency charged with responsible management of publicly owned resources. It misleads American citizens in the worst way. Many LSRs have no old growth ecological characteristics and cannot function as old growth forest. What good is a name? Ecosystems are not conserved on paper – they are preserved by functioning. Endangered wildlife species such as the marbled murrelet and spotted owl cannot live in these young "LSR" habitats.

Moreover, there are other multi-factorial, knock-on, and ecologically catastrophic effects of clear cutting old growth forests. One loss is the diversity of fungi and microbes underpinning our Pacific Northwest Old Growth Forests, which recent research is finding likely the most diverse on Earth. This fungal diversity is destroyed by clear-cutting logging practices and is not recovered in monoculture tree plantations. Yet these fungi mycelium cells plus their symbiotic microbes - acting as the planet's primary recyclers in their services of breaking down and recycling the nutrients of dead organisms - these fungi cells may contain the richest anti-viral and anti-bacterial protections on Earth! After all, exposed as they are to decay, they've evolved the best ways to protect their own cells. These microbes process and nourish ancient forest, aid in protection of clean air, water, and the genetic library of species. What human disease cures and unrecognized ecosystem services will we lose by destroying them? These fungi don't live in eroded, species-poor, tree plantations.

"The BLM refuses to recognize that the scarce resource is not spotted owls, marbled murrelets or any of the other 300-plus plants and animals associated with old growth timber that are awaiting their turn to jam the timber production machinery. The scare resource is the old growth ecosystem itself."

- Ron Sadler, retired chief of forestry planning for the Bureau of Land

Management. 11/13/07

I imagine many BLM employees chose to work with natural resources because of their love of Nature. Please step up to the challenge now. Do not bend to commercial, industrial timber industry pressure to increase logging of the last relict stands of Old Growth Forest. Preserve all BLM old growth, and future generations and we will hail you as sound earth citizens. Plan sustainable tree plantation thinning; keep loggers employed in restoration forestry. Reject the WOPR.

Sincerely,

Carole Gale, MS Biology

Cc: Senator Gordon Smith Senator Ron Wyden Representative Peter DeFazio (4<sup>th</sup> District)