

August 4, 2009

Ned Farquhar, Deputy Assistant Secretary for Land and Minerals Management  
Michael Bean, Counselor to Department of Interior  
Department of the Interior  
1849 C Street NW  
Washington, DC 20240

Dear Mr. Farquhar and Mr. Bean,

Congratulations on your recent appointments to the Department of the Interior (DOI), and thank you for your part in the decisions to withdraw the Western Oregon Plan Revision (WOPR) and rework the northern spotted owl recovery plan and critical habitat re-designation. Our organizations work extensively in western Oregon to protect wildlands, waterways and at-risk species. Our tens of thousands of members, supporters, and volunteers truly love Oregon's wild places and cherish the opportunity to experience public lands in their natural, awe-inspiring state. We also live and work in the communities in western Oregon surrounded by BLM forests. Much of our work consists of monitoring projects on Bureau of Land Management (BLM) lands, including logging, thinning and fuels reduction activities.

The withdrawal of the misguided WOPR is a great step toward protecting mature and old-growth forests on BLM lands. We understand the desire of the DOI to move forward with ecologically and socially sound management policies that would have the BLM working productively to restore forests and generate employment in the woods. We think there are real opportunities to move a progressive agenda of forest restoration that would meet the goals of protecting these BLM forests while also producing a certain amount of timber and biomass from restoration-based thinning projects.

However, there are immediate threats to these unique ecosystems and the imperiled species that live in them. *WOPR's withdrawal does not affect over 13,000 acres of mature and old growth timber sales that are currently planned on BLM land in southwest Oregon.* These timber sales, located on the Roseburg and Medford BLM, were planned years ago under the Northwest Forest Plan and are only awaiting biological opinions from the U.S. Fish and Wildlife Service (USFWS). Many of the sales were part of previous consultations that were successfully stopped through litigation. They represent the "worst-of-the-worst" in terms of impacts to older forest habitat in the region. According to the Medford BLM biological assessment, 4,832 of the acres are "structurally complex" and fail to comply with Recovery Action 32 of the 2008 Recovery Plan. *We have expressed repeated concern to USFWS in Oregon about the consultations, and encourage USFWS not to issue biological opinions to Roseburg and Medford BLM and explore buy-back options where necessary.*

Amidst the controversy created by WOPR, most western Oregon BLM districts quietly met or nearly met their timber targets in 2008 by thinning in plantations (typically 40-70 year old Douglas fir tree farms). Our organizations support plantation thinning when treatments accelerate the development of older forest habitat and restoring fire suppressed stands when minimal or no new ecologically

damaging roads are required. According to the BLM's 2008 Annual Program Summary and Monitoring Reports, the Roseburg District sold 44.4 mmbf; the Eugene District sold 50.2 mmbf; the Salem District offered 55.3; and the Coos Bay District's numbers are not yet available but likely above its target. This is in sharp contrast to the Medford District, which sold 27.8 mmbf in 2008 and a mere 5 mmbf in 2007. The Medford District's low volume numbers are a result of its choice to propose controversial mature and old growth logging that has been met with steadfast and successful litigation. Clearly, there is a forestry program that enjoys widespread support on western Oregon BLM districts and one that is enshrouded in controversy and legal gridlock.

To help you more fully understand the state of the BLM's timber program in western Oregon, we have attached a list of projects that will likely go unchallenged and a list of problematic projects. We hope this offers a better understanding of what will likely move forward through the National Environmental Policy Act process quickly and what will generate continued distrust and gridlock. *We encourage you to give BLM district managers in Oregon clear direction to avoid planning projects in mature and old-growth forest habitat.*

We look forward to working with the new Administration on projects that enhance endangered species habitat, will deliver logs to mills and can employ a robust workforce in our forests. We are willing stakeholders in creating a new forest management vision for our western Oregon BLM lands. Please do not hesitate to contact us with thoughts or ideas.

Sincerely,

Josh Laughlin  
Cascadia Wildlands  
POB 10455  
Eugene, OR 97440  
541.434.1463

Joseph Vaile  
Klamath-Siskiyou Wildlands Center  
POB 102  
Ashland, OR 97520  
541.488.5789

Francis Eatherington  
Umpqua Watersheds  
POB 101  
Roseburg, OR 97470  
541.672.7065

cc: Stephanie Parent, Paul Henson, Ed Shepherd, Robyn Thorson, Sam Hamilton

## Current On-the-Ground Projects on Western Oregon BLM Lands

### LIKELY CHALLENGED (MATURE AND OLD GROWTH LOGGING)

**Medford BLM:** Conde Shell, Deer Lake, Lucky Lake, Platue Thin, Birdseye, Galls Foot, Flounce Around, Bowen Arrow, Double Ginger, Boney Skull, Cotton Snake, Caboose, Chew Choo, Five Cows, Five Rogues Timber Sale, Mari Kelsey, Cheney Slate, Pickett Charge, Althouse Sucker, Anderson West, Birdseye Jones, East Fork Illinois, Granite Joe, Granite Horse, Picket Snake, South Deer, Tennessee Lime, West Fork Illinois (all part of programmatic BLM BA awaiting FWS BO)

**Roseburg BLM:** Cow Catcher, Buck Fever, Dream Weaver, Sweet Pea, Class of 98, Dickerson Heights, Myrtle Morgan, HiYo Silver, Whatagas, Broken Buck, Yoncalla West, Christopher Folly, Emile, Green Thunder, Diamondback (all part of programmatic BLM BA awaiting FWS BO), South Umpqua Regeneration Plan, Major Glasco

**Salem BLM:** Cherry Mill, Better Butte, Rickard Creek

**Eugene BLM:** Fall Creek Regen

**Coos Bay:** Edson Regen, Fairview, East Fork Coquille

### LIKELY UNCHALLENGED (PLANTATION THINNING AND FUELS REDUCTION)

**Medford BLM:** Deer Willy, South Stew, Fizzy Stew, Fortune Stew, Two Bit Stew, North Stew, Middle Cow LSR, Healthy Murph, Eaststar

**Rosburg BLM:** 38 Special, Baby Boomer, Basin Arizona, Calahan Mudaxle, Coffin Corner, Corvid, Craven Raven, Days Coffee, Devil's Den, Doe Eyed, Dragnet, Foghorn Cleghorn, Johnson Creek, Kryptonite, Milk Shake, Off Your Walker, Old Crow, Pass The Buck, Saddle Up To Paradise, Sherlock Home, Shively Whiplash, Slim Big Jim, Thin Air, Tin Horn, Treetop Flyer

**Salem BLM:** Gordon Creek, Mainline II, Blind Barney, Condenser Peak, House Mountain, Fan Creek, McFall Creek, McDowell Creek, Round Mountain, Flora and Fauna, Cruiser Creek, Maxfield Creek K-Line, Parker Bear, Keel Mountain, Powerline Dairy, Snake Creek Thinning

**Eugene BLM:** Seeley Creek, Stone Pony, East Chinkapin, Tower Canyon, Prairie Road, Bear West, Johnson 33, Cogswell Creek, Stone Pony, East Chinkapin, Tower Canyon, Prairie Road, Bear West, Johnson 33, Cogswell Creek, Hatchery Creek, Upper Siuslaw Landscape Plan, Russell Creek

**Coos Bay BLM:** Think Big, Rocky Top, Devil's Paradise, Blue Retro Rethin, Paradise Tie, North Soup, Heavy Bone, Brummed Out, Busy Signal, Edson Thin, Luts Hedden, Rocky Bottom