

To: Director Tracy Stone-Manning

Re: Old-Growth Implementation Guidance, Public Lands Rule

Date: September 19th, 2024

Dear Director Stone-Manning,

The below organizations are writing to request that the Bureau of Land Management (BLM) issue implementation guidance on the need to conserve mature and old-growth forests as part of implementing the Public Lands Rule. Last summer, Americans from across the country submitted over 300,000 comments calling on the Bureau of Land Management to protect mature and old-growth forests through the agency's Public Lands Rule. The Rule was finalized in April of 2024; however, additional clarification on conservation of mature and old-growth forests is still needed.

Mature and old-growth forests provide clean air and water, fish and wildlife habitats, landscapes for recreation and play, and cultural value to Indigenous communities—and they capture the imaginations of Americans young and old. They are also an essential natural climate solution that sequesters and stores vast amounts of carbon. With their thicker protective bark and higher canopies, mature and old-growth trees are more resilient to wildfire. Recognizing these myriad co-benefits, President Biden directed the Department of the Interior to conserve and promote mature and old-growth forests for biodiversity and as a natural climate solution as part of [Executive Order 14072](#).

The following three projects underscore the importance of clear direction to land managers to conserve mature and old-growth forests. Currently, numerous timber sales are underway on western BLM lands that threaten the integrity of these critical ecosystems. These projects will have significant impacts on mature and old-growth forests, and demonstrate the fact that land managers have not made efforts to comply with the direction of either EO 14072 or the old-growth components Public Lands Rule, which calls on the BLM to maintain intact lands to help support wildlife, habitat connectivity, old-growth forests, and ecosystem function.

1. **The Last Chance Project** is located North of Grants Pass in the Medford BLM District. The project would remove over 3,400 acres of spotted owl habitat, target nearly 1,300 acres of riparian areas for logging, and allow dozens of miles of new logging roads, including through critical coho salmon habitat and old-growth stands. The Last Chance Project's conversion of mature forest to "early successional" stands, as well as the creation of 4-acre clearcut "gaps" throughout the area, will increase fire hazards across the landscape.
2. **The Blue and Gold Project** is located west of Yoncalla in the Roseburg BLM District. It contains some of the last fragments of unlogged, carbon-storing forests in the vicinity.

Much of this project area was previously protected within Late Successional Reserves under the original Northwest Forest Plan, but these protections were withdrawn when these lands were moved to Harvest Land Base in the 2016 RMP. This beautiful area provides essential habitat to imperiled northern spotted owls and marbled murrelets. One of the proposed alternatives would remove over 1,700 acres of incredibly important spotted owl habitat and punch new roads right through incredible old-growth groves, all the while increasing fire hazard in “regeneration” units (which are similar to clearcuts) for at least 50 years. Prior to 2016, BLM managed much of this project area as a Late-Successional Reserve to promote habitat for imperiled species, underscoring the egregiousness of the aggressive logging now proposed here.

- 3. The 42 Divide Project** is located in the Roseburg BLM District. This project proposes logging 5,280 acres of conifer stands, including clearcutting and commercial thinning on 1,728 acres, and building logging roads. Trees up to 200 years old are targeted for logging, though we know from past projects that forest stands are likely even older than BLM states. The project includes some of the most intensive tree removal that the BLM allows.

Combined, these projects threaten thousands of acres of mature and old growth forests across western Oregon BLM lands. Nonetheless, these projects also represent just a fraction of the numerous large-scale projects across western BLM lands that will harm mature and old-growth forests. These low-elevation forests hold some of our last remaining older forest in Oregon, and allow for connectivity and dispersal corridors for threatened species between higher-elevation lands in the Cascades and Coast Ranges.

We are calling on BLM to issue old-growth implementation guidance that requires additional transparency from the BLM on any removal of mature and old-growth trees and sets goals for the recruitment and recovery of old-growth forests across BLM-managed forest lands.

The severe loss of biodiversity and the worsening impacts of climate change require solutions that match the magnitude of the threats we face. Please take swift action to issue implementation guidance on mature and old-growth forests. The continued large-scale destruction of these essential ecosystems must stop.

Sincerely,

350 Eugene
350 Salem Oregon
350 Seattle
American Bird Conservancy
Applegate Siskiyou Alliance
Bird Alliance of Oregon
Blue Mountains Biodiversity Project
Breach Collective
Cascade Forest Conservancy
Cascadia Wildlands
Climate Communications Coalition
Coast Range Association
Conservation Northwest
Earthjustice
Elwha Legacy Forest Coalition
Environment America
Environment Oregon
Environmental Protection Information
Center - EPIC
Forests Forever
Gallatin Wildlife Association
Green Snohomish
Heartwood
John Muir Project
Kentucky Heartwood
Klamath Forest Alliance
KS Wild
Los Padres ForestWatch
MCAT, Mobilizing Climate Action Together
New Mexico Wild
Old-Growth Forest Network
Olympic Climate Action
Oregon Wild
Protect Our Woods
Restoring Earth Connection
Rocky Mountain Wild
Sierra Club
Silvix Resources
South Umpqua Rural Community
Partnership
Thurston Climate Action Team
(TCAT)--Tree Action
Tualatin Riverkeepers
Umpqua Watersheds
WildEarth Guardians
Yaak Valley Forest Council