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Formerly Oregon Natural Resources Council (ONRC)

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August 4, 2009

Ken Salazar, Secretary of the Interior  
Department of the Interior  
1849 C Street, N.W.  
Washington DC 20240

**Re: Post-WOPR Oregon restoration thinning projects, conservation report card**

Dear Secretary Salazar,

On behalf of our thousands of members across Oregon, and the nation, we are writing to express our support for your recent decision to withdraw the Western Oregon Plan Revisions (WOPR), and to express our strong desire to work with the Department of the Interior on restoration-based thinning programs in Western Oregon.

In addition to the WOPR, we also commend you for your decision to withdraw the Bush administration's scientifically indefensible Northern Spotted Owl Recovery Plan and critical habitat designation.

Going forward, it is imperative that the Bureau of Land Management (BLM) move away from controversial mature and old-growth logging, and focus instead on restoration-based thinning projects. Abiding by the provisions of the 1994 Northwest Forest Plan (NWFP) would be a good start. The NWFP remains the only science-based and legal plan for managing northwest forests, and we urge the Department of the Interior to build upon the success of the Plan while addressing its one main flaw –the loophole which left 1.1 million acres of mature & old-growth forests unprotected in the so-called “matrix”.

Conservation groups are justifiably cautious in dealing with the BLM, especially after the 1995 Rescissions Act salvage rider and the agencies past refusal to adhere to important aspects of the Northwest Forest Plan, especially aspects relating to the aquatic strategy and protection of rare wildlife that live in old growth forests. The Medford and Roseburg Districts of the BLM have a deeply troubling history when it comes to old-growth and endangered species. But despite this history, we do believe there is common ground on which to move forward. Restoration-based thinning projects offer an opportunity to

produce sustainable economic activity in rural communities while protecting critically important environmental values.

Conservation community support for restoration-based thinning in dense young stands is based on a vision of compromise where mature and old-growth forests are protected, riparian areas are safeguarded, and timber production is the by-product of legitimate restoration activities. Securing broad environmental community support for thinning projects will be difficult if the BLM continues to insist on offering timber sales that target older stands, or include harmful practices such as clear cutting (often euphemistically referred to as “regeneration harvest”).

Some administrative units within the BLM and the U.S. Forest Service have already embraced such restoration-based thinning programs, and have been very successful in meeting their management targets with little conflict or controversy. Examples include the Siuslaw National Forest, the Gifford Pinchot National Forest, and the Eugene and Salem Districts of the BLM. In recent years, even the Roseburg BLM District has been able to meet its management goals and harvest targets primarily through restoration-based thinning projects. There is always room for improvement, but such projects clearly offer great promise for moving away from the bitter conflicts over WOPR and old-growth and mature forest logging.

In an effort to assist in moving forward and in avoiding conflict, we have reviewed the list of “ecologically sound” timber sales the Department of the Interior issued on July 16<sup>th</sup> and graded them in report card fashion. We greatly appreciate the Department of the Interior putting forward this list, and we hope our report card can provide a starting point for further discussion. Many of these sales are in fact good and non-controversial, some would benefit from modification, while a few cannot be supported by the conservation community and will likely engender significant public opposition.

<b>Project</b>	<b>Commendable</b>	<b>Needs Improvement</b>	<b>Final Grade</b>
<b>Yamaha,</b> Salem BLM, 159 acres thinning in stands 34 to 69 years old, 0.5 miles road construction	Focuses on young stands, almost comprehensive restoration (pre-commercial thinning, snag creation, place large wood in streams, culvert replacement, road drainage improvement, ¼ acre “gaps” with structural retention)	Logging in riparian reserve, impaired recruitment of dead wood habitat, road construction, failed to use stewardship authority which could have cycled money back to other restoration needs.	<b>B+</b>
<b>South [Stew] and Two Bit,</b> Medford BLM, 3800 acres biomass	Focused on small diameter material, trusted contractor (Lomakatsi) expected to do a good job	BLM refuses to put valuable timber in stewardship projects, so little money gets devoted to restoration	<b>B+</b>

extraction, uses stimulus money			
<b>Seeley Creek South,</b> Eugene BLM, 379 acres thinning in stands 45-60 year old, 2 miles new roads	Focuses on young stands.	Logging in riparian reserve, road construction, impaired recruitment of dead wood habitat,	<b>B</b>
<b>North Stewardship,</b> Medford BLM, 4500 acres thinning and biomass extraction	Small diameter material, stewardship contract could cycle some money back to restoration	BLM refuses to put valuable timber in stewardship projects, so little money gets devoted to restoration	<b>B</b>
<b>Ranch [Stew],</b> Medford BLM, 5,000 acres thinning, 9,000 tons biomass, uses stimulus money	Small diameter material, stewardship contract could cycle some money back to restoration	Tractor yarding with heavy equipment could harm soil, BLM refuses to put valuable timber in stewardship projects, so little money gets devoted to restoration.	<b>B</b>
<b>River Camp,</b> Eugene BLM, 290 acres thinning in stands 30-80 years old	Focuses on young stands, seeks to limit impacts to a spotted owl “area of concern”	Logging in riparian area, impaired recruitment of dead wood habitat, too much road construction, heavy thinning in a Late Successional Reserve	<b>C-</b>
<b>Gerber Stewardship,</b> Lakeview BLM, up to 4,000 acres of thinning, up to 3 miles of road construction	Creative attempt to fund removal of small material, aspen restoration, some non-commercial thinning	new road construction, logging in riparian areas, poor public involvement, failed to address overgrazing, inadequate analysis of wildlife impacts, vague and indefinite NEPA analysis,	<b>C-</b>
<b>Class of '98,</b> Roseburg BLM, “regen” harvest removing 740 log truck loads		Old-growth “regeneration harvest” (clear-cutting), sale found illegal in court once before	<b>F</b>
<b>Sweet Pea,</b> Roseburg BLM, “regen” harvest removing 60 log truck loads		Old-growth “regeneration harvest” (clear-cutting), sale found illegal in court once before, clearcuts on both sides of the Scenic/Historic Tour route between Myrtle Creek and	<b>F</b>

		Canyonville, removes some of the last old forest left that straddles the road.	
<b>Major Glasco,</b> Roseburg BLM, “regen” harvest, removing 940 log truck loads		Destructive regeneration harvest of mature forest habitat.	<b>F</b>

Secretary Salazar, we again thank you for your recent decisions regarding the WOPR, old-growth, and endangered species in Oregon. We look forward to working with your office, and with the BLM and US Fish and Wildlife Service, to advance restoration-based thinning projects that can provide sustainable economic activity for rural communities while safeguarding the mature and old-growth forests, salmon, wildlife, and clean water that so many Oregonians hold dear. We hope this report card can serve as the starting point for a longer conversation about improving these sales, and moving Western Oregon BLM lands towards conservation-based management.

Sincerely:



Steve Pedery  
Conservation Director  
Oregon Wild

CC:

Thomas Strickland  
Ned Farquar  
US Senator Ron Wyden  
US Senator Jeff Merkley  
Representative Peter DeFazio  
Governor Ted Kulongoski