

*Oregon Wild ~ Cascadia Wildlands ~ Federation of Western Outdoor Clubs  
Friends of the Elk River ~ Environment Oregon ~ Lower Columbia River Canoe Club ~ The Mountaineers  
Oregon Council, Trout Unlimited ~ Soda Mountain Wilderness Council ~ Umpqua Watersheds  
The Wilderness Society ~ Winter Wildlands Alliance ~ American Canoe Association  
American Hiking Society ~ American Whitewater ~ The Mazamas*

Mr. Clifford Dils, Forest Supervisor  
2900 Northwest Stewart Parkway  
Roseburg, OR 97471

March 8, 2010

Re: Citizen's Alternative Proposal for the D-Bug Timber Sale

Dear Supervisor Dils,

In June of 2009, we, along with hundreds of citizens and other stakeholders, submitted comments to your agency regarding the D-Bug Timber Sale. We strongly support common-sense efforts to protect human life and property from legitimate threats posed by fires on public forest lands. However, as you are no doubt aware, we are very concerned about the massive and incongruous scale of the proposal. The D-Bug project includes not only thinning near cabins and along roads, but also thousands of acres of commercial logging in roadless backcountry areas. It is understandable that backcountry logging of this scale, on the doorstep of Oregon's crown jewel – Crater Lake National Park, has generated strong opposition.

As we have expressed to you in the past, we would be pleased to work with you to develop a project that addresses the legitimate fire issues around structures and roads, without harming the nearby roadless areas or other important values. In that regard, attached please find a map and explanation of a citizen's alternative proposal for D-Bug and other supporting materials.

We would support a project that accomplishes the laudable and achievable goals of:

1. Protecting human life and property,
2. Maintaining and providing opportunities for low-impact recreation,
3. Preserving backcountry character,
4. Providing adequate and resilient wildlife habitat, especially for sensitive and at-risk species,
5. Reintroducing natural processes and fire regimes and reducing the need for unsustainable and long-term active management in the backcountry,
6. Being fiscally responsible,
7. Utilizing the best available science including that which tells us:
  - a. Beetles and fire are endemic and beneficial components of the landscape,
  - b. Large trees, both live and dead, are critical components of the ecosystem,
  - c. In the long-term, fire risk may not be increased by beetle epidemics, and it is in fact unclear if logging reduces either,
8. Complying with the letter and spirit of all relevant laws, rules, and regulations including the 2001 Roadless Rule, NWFP, NEPA, and the ESA.
9. Building public trust in the management of the Umpqua National Forest.

We firmly believe that these goals are mutually compatible and can be met - as they have in projects such as Red Zone in the Freemont-Winema National Forest, and the Black Butte-Glaze Meadows project in the Deschutes National Forest. A common consensus on these goals between the Forest Service, conservationists, and other stakeholders would be a positive step toward the spirit of responsibility, collaboration, and cooperation that Americans desire when it comes to forest management.

Based on the preferred alternative from the Draft Environmental Impact Statement, we divided the project into three zones: red, yellow, and green.

1. **Green:** Logging in these areas is appropriate. We support these efforts.
2. **Yellow:** Logging in these areas could do more harm than good and be unnecessarily controversial. Any logging here must be clearly justified by the goals of the project and fit the outlined criteria. Prescriptions for these areas may need modification to be appropriate.
3. **Red:** Logging in these areas is inappropriate to meet the goals, purpose, and need of the D-Bug project.

To meet its goals, the project should:

- Focus fuel reduction and fire breaks on immediate ignition zones around homes, well-travelled roads, and escape routes.
- Focus on areas accessible from existing roads and those modified by past logging and roadbuilding.
- Develop a wildfire use plan including an evacuation plan and remove hazard trees along well-traveled routes
- Allow natural processes including the growth, demise, and renewal of forests to take place in backcountry areas.
- Fully maintain old-growth and maximize the retention of large trees including in lodgepole stands.
- Permanently close unnecessary roads that degrade and fragment habitat, increase fire risk, and continue to require costly maintenance.
- Carefully thin plantations to enhance habitat, create jobs, and produce reasonable amounts of wood products.
- Preserve riparian areas and the unique hydrology that allows for world-class fishing opportunities.
- Be fiscally responsible and account for all reclamation costs.
- Collaborate meaningfully and in good faith with stakeholders.

To avoid continued conflict and public concern over this project:

- Do not log in inventoried roadless or other unroaded areas, potential Wilderness, or designated Recreation Areas
- Do not utilize hiking trails as logging roads or otherwise degrade low-impact backcountry recreation opportunities
- Do not build new roads, re-establish old roads, or build extensive networks of skid trails
- Do not prioritize commercial logging or wood products above the goals listed above
- Do not conduct regeneration harvests which removes too much habitat structure, and is, to many, simply a renaming of clearcuts
- Do not redefine lodgepole stands to include them in the timber base
- Do not log in units that were left out of previous projects specifically to assuage public concerns

One notable exception:

- To protect cabins around Diamond Lake, we support appropriate non-commercial logging to reduce fuels in the Mt. Bailey Inventoried Roadless Area in a reasonable buffer along the loop road and below the paved bike path.

The D-Bug Timber Sale has attracted national attention and rightfully so. The project area is on the doorstep of one of the world's great natural wonders and should be valued for its unique recreational, scenic, and environmental qualities. As proposed, the timber sale targets some of the most pristine backcountry left in the entire Umpqua National Forest and is of nationally historic proportions. It has understandably upset recreationists, conservationists, and others who value our remaining roadless wildlands.

Protecting homes and human life from forest fires is a universally shared goal. However, we firmly believe that we can accomplish this goal in the Umpqua National Forest without logging in roadless areas, damaging recreational opportunities, and degrading the scenic beauty that makes the region such a special place. We look forward to meeting with you soon and hope you will work with us in good faith to develop a project that all Oregonians can support.

Very Sincerely

(Please see next page for complete list of signers as of March 18, 2010)

Cc:

*Secretary of Agriculture Tom Vilsack*  
*Senior Advisor for Environment & Climate, Robert Bonnie*  
*Pacific Northwest Regional Forester, Mary Wagner*  
*United States Forest Service Chief, Tom Tidwell*  
*Deputy Undersecretary for Natural Resources and Environment, Jay Jensen*  
*Governor Ted Kulongoski*  
*Attorney General John Kroger*  
*Senator Ron Wyden*  
*Senator Jeff Merkley*  
*Congressman Peter DeFazio*  
*Diamond Lake District Ranger, Bill Gamble*

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General Counsel, American Canoe Association

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Legal Director, Cascadia Wildlands

Joan Zuber  
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Jim Rogers  
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Russ Pascoe  
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