

**SODA MOUNTAIN WILDERNESS COUNCIL  
THE WILDERNESS SOCIETY – OREGON WILD  
KLAMATH-SISKIYOU WILDLANDS CENTER  
SELBERG INSTITUTE**

Jerome E. Perez, State Director  
Washington/Oregon  
Bureau of Land Management  
P.O. Box 2965  
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August 18, 2015

ATTN: Mark Brown  
Submitted via email: <blm\_or\_rmpwo\_comments@blm.gov>

RE: Resource Management Plans for Western Oregon Draft Environmental Impact Statement

Dear Director Perez:

The Soda Mountain Wilderness Council (SMWC), The Wilderness Society, Oregon Wild, Klamath-Siskiyou Wildlands Center, and Selberg Institute submit this letter as a portion of our comments on the BLM's Draft Resource Management Plan/Environmental Impact Statement for Western Oregon (hereafter DEIS). SMWC and its members advocate for the protection of wildlands, biological diversity and ecological integrity in southwest Oregon and adjacent northern California. We are especially focused on the "greater Cascade-Siskiyou landscape" – e.g. the lands broadly adjacent and ecologically connected to the Cascade-Siskiyou National Monument (hereafter Monument)<sup>1</sup> – and protecting the outstanding levels of biological diversity for which this landscape is renowned. Similar to SMWC, other organizations that appear as signatories on this letter have a long-standing interest in the protection of the Monument and surrounding public lands. Please note that our comments here are specific to the greater Monument area and do not address broader DEIS-wide concerns, which are addressed elsewhere in materials submitted separately.

Although the DEIS does not directly prescribe management within the Cascade-Siskiyou National Monument, the proposed revision of the Resource Management Plan (RMP) in western Oregon is of great interest and concern to our members because land use changes on the Medford District are likely to have significant long-term consequences for the Monument itself. The Monument is nationally significant because it is located in a landscape where several distinct ecoregions converge and, as a result, contains a diverse and unique assemblage of species and natural communities, some of which are found nowhere else (USDI 2008, Frost and Odion 2002, USDI 2000a). Additionally, the Monument forms a central part of the only high-elevation land

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<sup>1</sup> The "greater Cascade-Siskiyou landscape," as defined in these specific Western Oregon Plan Revision DEIS comments, includes all BLM lands on the Ashland Resource Area (Medford District) east of Interstate 5 and south of the Little Butte Creek watershed, as well as portions of the Jenny and Fall Creek watersheds located within the Klamath Falls Resource Area of the Lakeview District. These areas were identified by an interdisciplinary group of scientists as most important in Oregon to ecological functioning of the Cascade-Siskiyou National Monument (see Frost et al. 2011). Adjacent California lands are important, too, but not covered by this Oregon DEIS.

bridge connecting the botanically rich Siskiyou Mountains with the Southern Cascades, which in turn facilitates the east-west dispersal of many plants and animals (USDI 2000a,b).

The BLM is legally obligated to manage the Monument in accordance with Presidential Proclamation 7318, directing BLM to protect the “*objects of biological interest*” (e.g., particular species and community types) for which the Monument was established and to sustain “*natural ecosystem dynamics*” and the “*ecological integrity*” upon which those objects depend (USDI 2000b). The BLM's ability to meet these explicit conservation objectives for the Monument is strongly influenced by how other public lands in the greater Cascade-Siskiyou landscape will be managed in the future.

Of particular relevance to the issue of WOPR impacts to the Monument is USDI Secretarial Order 3308, which speaks to the management of the National Landscape Conservation System (National Conservation Lands). The Order states that the National Conservation Lands “shall be managed as an integral part of the larger landscape, in collaboration with the neighboring land owners and surrounding communities, to maintain biodiversity, and promote ecological connectivity and resilience in the face of climate change.” The BLM's 15-Year Strategy for the Conservation Lands reinforces this by emphasizing an ecosystem-based approach to management of the Conservation Lands in the context of the surrounding landscape. Specifically, the Strategy requires coordination “across all BLM programs to more efficiently meet common goals, based on a common understanding of the designating legislation or presidential proclamation for a particular NLCS area.” (USDI 2011).

Additionally, BLM guidance for the National Conservation Lands provides that BLM will “[m]aintain or increase habitat connectivity with other important habitat areas to provide for sustainable populations of native species and “[p]articipate in local planning and watershed analyses efforts to identify the effects of adjacent land management on NLCS areas.” (USDI 2011). Thus, BLM policy guidance requires **all** BLM managers – not just managers of units of the National Conservation Lands – to manage the broader landscape around units consistent with protective goals of the National Landscape Conservation System and the individual units within the system.

The following points provide foundational evidence as to why the ecological integrity of the Monument is intimately linked to how surrounding BLM lands are managed:

- 1) Many special-status plant and animal populations highlighted in the Monument proclamation, as well as high quality examples of the area's unique plant communities, are located on BLM lands outside of existing monument boundaries. If these habitats are lost or degraded due to BLM management, adverse consequences within the Monument are likely to occur. For example, some focal species populations and communities may lose viability if they become isolated or important habitats become fragmented due to development on surrounding lands.

- 2) Existing boundaries of the Monument have little or no ecological basis (e.g. the Oregon-California state line) and follow straight lines rather than natural watershed breaks. As a result, management on adjacent BLM lands is likely to have a disproportionately large effect on biological resource values within the Monument. Over time, incompatible management activities such as logging, road building, and other development are likely to compromise important ecosystem functions upon which the integrity of the Monument ultimately depends.

3) One of the primary ecological values associated with the Monument landscape is that it provides the only relatively intact forested habitat linkage between the Siskiyou Mountains and the Southern Cascades. While the Monument forms an essential portion of this land bridge, it alone is insufficient to maintain this larger landscape-level function. If relatively intact habitats located on non-monument lands within this key east-west corridor are further degraded by development, this connectivity function may be compromised or lost altogether, with significant long-term consequences for the region's biota.

4) A 2011 scientific assessment<sup>2</sup> determined that the existing Cascade-Siskiyou National Monument is too small to successfully protect the many biological objects of interest for which this Monument was originally established. The scientists' report concluded that Monument expansion is required to safeguard persistence of the area's unique biological resources, and identified specific parcels of BLM land that most warrant inclusion in an expanded Monument. Under the various action alternatives of the DEIS, many of these proposed Monument additions are threatened by logging, road construction, and other development that would harm biological values and thereby foreclose options for improving the Monument's ability to achieve its stated conservation goals.

The logical conclusion that emerges from these ecological concerns is that because of the high potential for adverse impacts to the Monument, BLM lands within the greater Cascade-Siskiyou landscape deserve special consideration and increased levels of protection in order to comply with existing statutes and policy directives. Unfortunately, the DEIS fails to adequately address or even mention the potential impacts of the various action alternatives on the Monument, which we believe to be an egregious omission. Therefore, **we request that BLM conduct and present supplemental analysis in the forthcoming Final EIS describing how and to what degree proposed alternatives are likely to impact the Monument's wildlife, unique natural communities and other biological objects of interest.** Failure to do so represents a violation of NEPA because existing analysis is incomplete, not based on the best available science and prevents full disclosure of the environmental consequences of proposed actions.

NEPA dictates that BLM take a "hard look" at the environmental consequences of a proposed action and the requisite environmental analysis "must be appropriate to the action in question." *Metcalf v. Daley*, 214 F.3d 1135, 1151 (9th Cir. 2000); *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 348 (1989). In order to take the "hard look" required by NEPA, BLM is required to assess impacts and effects that include: "ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, *whether direct, indirect, or cumulative.*" 40 C.F.R. § 1508.8. (emphasis added). A failure to include a cumulative impact analysis of actions within a larger region will render NEPA analysis insufficient. *See, e.g., Kern v. U.S. Bureau of Land Management*, 284 F.3d 1062, 1078 (9th Cir. 2002) (analysis of root fungus on cedar timber sales was necessary for an entire area).

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<sup>2</sup> Frost, E., D. Odion, P. Trail, J. Williams, J. Alexander, B. Barr, R. Brock, D. DellaSala, P. Hosten, S. Jessup, F. Lang, M. Parker, J. Rossa, D. Sarr and D. Southworth. 2011. Cascade-Siskiyou National Monument Boundary Study: Identification of Priority Areas for Monument Expansion. 14 pp. Previously submitted to Medford District BLM by the Soda Mountain Wilderness Council, Ashland, OR.

While the DEIS fails to address how the range of action alternatives may impact Monument values and resources, available evidence indicates that adverse and significant environmental consequences to the Monument from proposed revision of the Medford District RMP are in fact likely to occur. In particular, we are alarmed by the BLM's across-the-board proposals to:

- reduce riparian forest protections
- eliminate the Aquatic Conservation Strategy
- abandon protections for Key Watersheds
- minimize green tree and down wood retention standards in logged areas
- increase the size of the agency's already-too-large and environmentally harmful road network
- eliminate the Survey and Manage program for rare plants and animals except for a very small subset of species.

In addition to these systemic rollbacks, the DEIS Preferred Alternative B would eliminate two existing Areas of Critical Environmental Concern (ACECs) in the Ashland Resource Area (Moon Prairie, Hoxie Creek), both of which contribute to protecting important elements of biodiversity in the greater Monument landscape. If implemented individually or collectively, the above changes to the RMP will significantly reduce habitat values on public lands around the Monument, and quite possibly foreclose future options for the BLM to meet the conservation goals explicitly set forth in the proclamation (USDI 2000b).

At the same time that the DEIS proposes to systemically weaken or eliminate many key provisions of the Northwest Forest Plan as listed above, some proposed land use changes in various action alternatives would likely improve conservation-based management, at least for specific areas, in the Monument landscape. For example, Alternatives A and C would expand the network of Late-Successional Reserves and Large Block Reserves within the greater Monument area (respectively), and Alternatives A and D would designate two additional ACECs – Green Springs Mountain and Surveyor Mountain – that would provide piecemeal protection for rare species and natural communities. Unfortunately, none of the alternatives incorporate all of these provisions into an ecologically sound and integrated design. The DEIS fails to consider an alternative that would safeguard the Monument from long-term adverse impacts, leaving the public and decision maker with an arbitrary and overly narrow range of choices by which to assess environmental tradeoffs.

Given the central importance of the Monument for sustaining regional biodiversity and the recognition that incompatible management on surrounding BLM lands has the potential to significantly degrade Monument values and resources, **we request that the BLM design and evaluate an action alternative in the Final EIS specific to the greater Cascade-Siskiyou landscape that includes all of the following elements:**

- A network of Late-Successional Reserves including all forest stands greater than 80 years old, as outlined in DEIS Subalternative C.
- Retains all elements of the Aquatic Conservation Strategy and management provisions for Key Watersheds, as well as standards and guidelines for Riparian Reserves and the Survey and Manage requirements for protecting special-status species as set forth in the DEIS No Action Alternative (Northwest Forest Plan).

- The network of Large Block Reserves as defined in DEIS Alternative C, along with specific, scientifically-based standards and guidelines that outline how thinning and other silvicultural treatments will be accomplished in an ecologically sensitive manner.
- All ACECs in the Ashland Resource Area east of Interstate 5 and western portion of the Klamath Falls District, as included in DEIS Alternatives A and D – i.e. retaining the four existing ACECs in the greater Cascade-Siskiyou area (Hoxie Creek, Moon Prairie, Tin Cup and Old Baldy) while also establishing two new ACECs, Green Springs Mountain and Surveyor Mountain.
- Expands the Green Springs Mountain ACEC to include all of the Rogue Valley Foothills ACEC, as recently described and proposed by SMWC and other groups in an extensive report submitted to BLM on June 22, 2015.<sup>3</sup>
- The system of proposed Recreation Management Areas (RMAs) defined in DEIS Alternative D, along with standards and guidelines that limit timber harvest, off-road vehicle use and other potentially incompatible activities so that they will not reduce aesthetic and recreational values.
- Adopts all eligible Wild and Scenic River segments as outlined in DEIS Alternative D, with the specific addition of Jenny and Spring Creeks as set forth in both the Oregon and California Land Grant Act of 2015 (Senate Bill S.132) and the 2015 Oregon Wildlands Act.

We believe consideration of this "mix-and-match" alternative specifically for the greater Monument landscape is necessary because it provides a solid benchmark to evaluate what actions may be required in order to provide some assurance that the biological values and ecological integrity of the Monument will be sustained into the future. Moreover, this alternative would to a large degree maintain future options for creating an expanded monument (as recommended by Frost et al. 2011) that is likely to achieve the conservation goals and objectives upon which the Monument was originally established.

In summary, the DEIS's proposal to abandon numerous key provisions of the Northwest Forest Plan that contribute to the protection of forests, watersheds and wildlife threatens to result in significant, adverse environmental impacts to BLM lands upon which the ecological integrity of the Cascade-Siskiyou National Monument ultimately depends. Before deciding on how and in what specific ways the Medford District RMP shall be revised, we assert that the BLM must rigorously analyze the potential consequences of the various action alternatives for the Monument's biological values and resources, and consider an alternative as specifically outlined in these comments that offers a high likelihood of achieving the Monument's proclamation mandate to protect the "*objects of biological interest*" (e.g., particular species and community types) and to sustain "*natural ecosystem dynamics*" and the "*ecological integrity*" upon which those objects depend (USDI 2000b).

Thank you for your consideration of these comments. We hope the BLM will seriously address issues raised in this letter regarding the future of the Cascade-Siskiyou National Monument and

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<sup>3</sup> Frost, E.J. 2015. A Proposal to designate the Rogue Valley Foothills Area of Critical Environmental Concern (ACEC) in the Ashland Resource Area, Medford District BLM. Submitted by Soda Mountain Wilderness Council, Klamath-Siskiyou Wildlands Center, Selberg Institute, The Wilderness Society, Siskiyou Chapter/Native Plant Society of Oregon, Oregon Wild, Geos Institute and Center for Biological Diversity, to the Oregon/Washington Office of the BLM, in response to the Draft Environmental Impact Statement for the Resource Management Plans for Western Oregon, Portland, OR. Dated June 22, 2015. 32 pp.

the greater landscape of which it is a part in forthcoming NEPA documentation, using the best available scientific information.

Sincerely,

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## **LITERATURE CITED**

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