



**OREGON  
WILD**

Formerly Oregon Natural Resources Council (ONRC)

January 11, 2008

U.S. Bureau of Land Management  
Western Oregon Plan Revision  
P.O.B. 2965  
Portland, Oregon 97208  
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Dear BLM,

I am writing on behalf of Oregon Wild, a non-profit conservation organization representing about 5,000 members, to give site-specific comments on the Western Oregon Plan Revision's proposed action. Please consider this letter an addendum to the longer comments submitted by Doug Heiken, also representing Oregon Wild.

While this is not a comprehensive list of the places Oregon Wild's members use and enjoy, these are some of the places we have personally documented as having important values that should be preserved under any new management plan. Please take these comments on the WOPR Draft EIS into consideration.

### **Site: Wolf Creek, Eugene District**

**Current status:** LSR, RR

**Status under WOPR Alt. 2:** Eastern portion: LSMA. Western portion: TMA. (new BLM analysis shows all of the area as TMA)

The Wolf Creek watershed is an important tributary to the Siuslaw, providing quality fish and wildlife habitat and connectivity through the BLM checkerboard. Small but highly ecologically valuable stands of old-growth forests (120 years old and older) exist throughout the drainage. The important fish and wildlife values in and near Wolf Creek should lead the WOPR analysis towards protecting the area as an LSMA or other type of reserve.

More specifically, during the process of revising Alternative 2 of the Western Oregon Plan Revision, please keep T. 19S. R.06W. Sec. 17 as a Late Successional Management Area. The old-growth grove in this section has been nominated as an Environmental Education Area by Ms. Kate Gessert, and Oregon Wild supports this designation. The small grove of old-growth forest in this section is used regularly for environmental education and recreation, and is greatly valued by students, teachers, and residents in Crow and Eugene.

This particular forest has become important in the lives of many people, especially immigrant students at Lane Community College who are learning to respect and protect the environment in their new home as they learn English. For the past three years, field trips to the old growth forest on Wolf Creek have been an important part of class study of western Oregon nature and environmental protection. Student docents have learned to explain such elements as snags, nurse logs, vegetation layers and food chains of an old-growth forest to others. They served as forest guides for another group of E.S.L. students from L.C.C., and also began to introduce the forest to students from Crow High School. The Wolf Creek forest is becoming an educational element in the lives of more and more students and other people as well.

We believe it is important to have an old-growth area for learning about the forest in the Coast Range and west of Eugene, in addition to the BLM's two formal Environmental Education areas east of I-5, which are not in the Coast Range. It helps many educators and students to have an old-growth forest close to educational institutions in and near Crow/Lorane/Veneta and west Eugene, in a place on Wolf Creek Road that is easily accessible to everyone.

## **Site: Low Elevation McKenzie Headwaters, Eugene District**

**Current status:** AMA, Tier 1 Key Watershed, NSO CHU.

**Status under WOPR Alt. 2:** TMA with some “administratively withdrawn” areas within WSR corridor, and possibly for steep slopes and bald eagle nests. Jimbo Mountain and Marten Creek areas nominated as ACEC and found to meet criteria, but then not designated as ACEC in Alt. 2.

The June 1995 Eugene District RMP ROD (p. 71) describes the Low Elevation Headwaters of the McKenzie River (LEHMR) Potential ACEC as “a large block of minimally disturbed forests in late and mature seral states with small, scattered patches of old growth islands. The area supports habitat essential for maintaining endangered, threatened, and sensitive fish and wildlife species. The area also includes the intact low elevation Bear Marten Key Watershed, representing excellent conditions for water quality and other riparian values.”

The area has been found to meet ACEC eligibility criteria, and it does require special management attention to protect its important and relevant values. This status is needed to protect the area’s late-seral and old-growth habitat from inappropriate logging practices (allowed in the AMA designation under the Northwest Forest Plan) that would degrade or destroy these special values.

The area contributes to the high quality drinking water provided by the McKenzie River to the city of Eugene. The area lies on either side of the McKenzie River, and it contains tributaries named as Tier 1 Key Watersheds that provide good water quality. This value must be protected from degradation for the benefit of the thousands of people who depend on clean drinking water from the McKenzie.

In addition, the area provides a scenic backdrop for people driving on Highway 126 and rafting the McKenzie River. The significant tourist economy that helps sustain the McKenzie Valley (as well as Eugene, Springfield, and Bend) depends on scenic beauty to attract visitors to the river, the surrounding forest, and its communities. Protecting the scenic values of the LEHMR from logging, mining, and OHVs is essential to the local economy and quality of life.

The Bear and Marten Creek areas of the Mid-McKenzie Landscape Design (MMLD) have the highest percentage of large habitat blocks in the mid-McKenzie landscape. The magnitude and significance of this wild area is best represented by adding the 7,650+ acre proposed ACEC to the 6,399 acre Mt Hagan inventoried roadless area (on adjacent Forest Service land), plus 2,641 acres of uninventoried USFS roadless adjacent to the Mt Hagan IRA, for a grand total of 16, 690 acres of nearly contiguous wildlands. Large blocks like this are exceedingly rare on BLM lands in western Oregon. The unique nature of this large block of native forest, which provides a functioning forest ecosystem and wildlife habitat on a large scale, is relevant for protection.

Due to high habitat quality and connectivity, the area should be reconsidered for late-successional management area or reserve status.

## **Site: Crabtree Valley, Salem District**

**Current status:** LSR, ACEC (RNA and ONA)

**Status under WOPR Alt. 2:** TMA. ACEC remains designated, but all O&C lands will be part of timber base. This area is one of the best examples of an old-growth forest available in Oregon. It’s RNA/ONA/ACEC status is well-earned and the entire area should be managed to maintain and enhance the R&I values for which it was designated. The area and its surrounds should be part of the LSMA or similar designation, as it provides important habitat connectivity as well.

Clarification is needed to correctly identify how this area will be managed. The Alt. 2 map shows the entire ACEC/RNA as administratively withdrawn, but Appendix M in the DEIS says the ACEC without O&C lands will be managed as ACEC. This means everything outside of section 16 (which is public domain), would be part of the timber base and not specially managed to maintain or enhance R&I values. In addition, the DEIS (p. 807) states that all RNAs would be retained. Please clear up these inconsistencies. Please specifically address the proposed management for this area and be sure management plan maps reflect this management accurately.

### **Site: Wasson Creek/Vincent Creek area, Roseburg District**

**Current status:** NSO CHU, Tier 1 key watershed, LSR, RR

**Status under WOPR Alt. 2:** TMA.

The Wassen-Vincent area contains key watersheds for coho salmon and steelhead. Wassen Creek is a Tier 1 Key Watershed and contains important spawning and rearing habitat for coho salmon and steelhead. Vincent Creek is also an important spawning and rearing area for coho and steelhead. Both Vincent and Wassen Creeks provide habitat for sea-run cutthroat trout and Pacific lamprey as well.

The Wassen-Vincent area contains several pockets of late-seral and old growth (LS/OG) habitat which are rare and fragmented in the Coast Range. These forest stands offer significant habitat and connectivity value – especially in the context of the checkerboard ownership pattern in the area. Fragmentation is a significant contributor to loss of habitat and water quality. This large block of BLM land containing late-successional forests (in context with adjacent Forest Service land) deserves protection from further fragmentation to preserve its unique values.

Due to high habitat quality and connectivity, these small but important watersheds should be reconsidered for late-successional management area or reserve status.

### **Site: Alsea Falls area, Salem District**

**Current status:** LSR, RR

**Status under WOPR Alt. 2:** TMA

Much of the BLM land within 5 to 10 miles of the Alsea Falls Recreation Area is comprised of mature and old-growth forests. Many of the older native forest stands contain numerous trees between 7 and 10 feet in diameter. The large size and classic late-successional structure of these trees and stands, unique within the eastern Coast Range, offer important habitat connectivity that should be preserved and enhanced. While much of the surrounding area has been logged, BLM and Forest Service restoration projects are currently working to restore structure and function to this area's landscape. This area should be reconsidered for late-successional management area or reserve status so it can continue to provide important habitat quality and connectivity.

### **Comments on ACECs**

Per my understanding, under Alternative 2, existing ACECs that are on O&C land would be in the timber base. If, by managing these areas thus, the BLM is not able to maintain the areas' relevant and important values, the area would be removed from ACEC status (hence the elimination of 31 existing and potential ACECs under Alt. 2). If an ACEC could be in the timber base but still retain these values, it's still an ACEC. Basically, only the MINIMUM area necessary to maintain R&I values would remain. This, and the maintenance of a mere 65-75% of the relevant and important values within ACECs under Alt. 2 (p. 807, DEIS), is unacceptable.

The O&C Act does not preclude the designation and maintenance of special areas. Under all alternatives, all current ACECs should be retained and specifically managed to retain relevant and important values for which they were designated. All ACECs nominated during WOPR development that met criteria should also be added as ACECs.

In the FEIS, we hope you will give more specific and clear guidance and explanation about how ACECs will be managed.

Sincerely,

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