



June 1, 2016

The Honorable Sally Jewell
Secretary
U.S. Department of the Interior
Washington D.C. 20240

Christy Goldfuss
Managing Director
White House Council on Environmental Quality
Washington, D.C. 20501

Dear Secretary Jewell and Managing Director Goldfuss,

The undersigned conservation groups are writing to request that the Obama administration not sign the Record of Decision the Bureau of Land Management's Final Environmental Impact Statement and Resource Management Plans for Western Oregon (FEIS). We are concerned that in many instances, the FEIS appears to violate national environmental laws including the National Environmental Policy Act, the Endangered Species Act, the Federal Land Policy and Management Act, and the O & C Act of 1937.

Additionally, the FEIS departs from several of the sound-scientific underpinnings of the Northwest Forest Plan, including the Aquatic Conservation Strategy and "Survey and Manage" program that have repeatedly been validated by scientists and agency 20-year monitoring studies as the best science for ecosystem management and biodiversity conservation in the region.

Enclosed for your review are letters from the Northwest Coalition and member groups sent to the BLM that identify these legal violations. In addition, the protests highlight areas where current protections for clean water and endangered wildlife are weakened. Moreover, of the all the alternatives analyzed, the Proposed RMP is the worst from a carbon sequestration standpoint, and will store the least amount of heat-trapping emissions, at a time when

President Obama is calling for increased actions to reduce the nation's dangerous greenhouse gas emissions.

The proposed plan eliminates the strong water quality and habitat provisions of the Northwest Forest Plan, reducing streamside no-logging buffers by half or more (a loss of 300,000 acres of streamside reserves). These reductions threaten wild native fish, water quality, terrestrial species, and aquatic recreational opportunities.

As we pointed out in comments on the draft RMP, the No Action Alternative is based on the Northwest Forest Plan as written, as opposed to how it is actually being implemented after two decades of adaptive management. As a result, it does not offer a useful baseline for analysis, or for comparison with the proposed alternative. White House Council on Environmental Quality guidance on this point is clear: "In these cases "no action" is "no change" from current management direction or level of management intensity."

The draft also did not provide the public with a suitable range of alternatives. Conservation groups had requested that BLM develop a conservation alternative that builds upon the Northwest Forest Plan by expanding the reserve network and applying additional conservation measures to protect declining species and store carbon long-term in maturing forests. This alternative is reasonable and implementable, and should have been considered by the BLM.

The FEIS also failed to analyze how the BLM's apparent abandonment of some of the core protections of the Northwest Forest Plan will affect management on surrounding federal and nonfederal lands. As you know, the Northwest Forest Plan is a landmark conservation plan and represents the "federal contribution to recovery" of listed species: weakening its core principles will undermine regulatory certainty that other landowners rely upon in their land management decisions, creating a regulatory vacuum and uncertainty.

The FEIS and proposed RMPs appears to be driven by the BLM's perceived need to meet court ordered timber mandates. The timber industry had filed several challenges to BLM's management of O&C lands in the D.C. District Court, generally arguing in each case that BLM had failed to offer for sale sufficient timber to meet statutory requirements. Federal courts have rejected these challenges, and as a result, there is no "court-ordered mandate" to increase timber harvest on O&C lands.

Therefore, we believe withdrawing the FEIS from further consideration is warranted. Instead, we recommend that BLM work with the Forest Service to develop a regional EIS that retains and builds upon the fundamental principles of the Northwest Forest Plan.

Thank you for considering this request.

Sincerely,

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