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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
MEDFORD DIVISION

KLAMATH SISKIYOU WILDLANDS  
CENTER, an Oregon non-profit corporation;  
OREGON WILD, an Oregon non-profit  
corporation; and CASCADIA  
WILDLANDS, an Oregon non-profit  
corporation;

Plaintiffs,

v.

BUREAU OF LAND MANAGEMENT, an  
administrative agency of the United States  
Department of Interior,

Defendant,

and

MURPHY COMPANY,

Defendant-Intervenor.

Civil No. 1:17-cv-997-CL

DECLARATION OF GEORGE SEXTON

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I, GEORGE SEXTON, declare and state as follows.

1. I am the Conservation Director of the Klamath Siskiyou Wildlands Center (“KS Wild”), and I have worked for KS Wild since 2002. I am over the age of eighteen, and I make this declaration based on my own personal knowledge. I reside in Jackson County, Oregon. I am a member of KS Wild, Cascadia Wildlands and Oregon Wild.

2. I hold a Juris Doctorate from the Lewis and Clark School of Law obtained in 1997 and have worked professionally since that time in the non-profit forest conservation field reviewing BLM and Forest Service analysis under the National Environmental Policy Act.

3. KS Wild has approximately 3,500 members. Our members are interested in and support KS Wild’s work to protect the forests of the Klamath Siskiyou region for their botanical, recreational, scientific, hydrological and aesthetic values.

4. I often hike, camp, photograph and explore the native mature forests in the Grants Pass Resource Area of the Medford BLM District.

5. I have definite plans to spend considerable time in the future using and enjoying native forests on public lands in the Ashland Resource Area, including the area in and around the Lower Grave timber sale within the Grave Creek Watershed. I have visited and continue to visit these native forests to appreciate the natural beauty and native biodiversity that are unique to intact undisturbed forests.

6. As an avid hiker and naturalist, I have spent considerable time exploring and enjoying the mature forests in the Grants Pass Resource Area. I am particularly fond of the recreational and ecological values provided by the remaining intact native and mature forests in the Grave Creek Watershed due to their rarity in the surrounding “checkerboard” land ownership pattern and their

regional importance for wildlife migration between the Cascade Mountain Range and the Klamath Mountain Range.

7. I derive significant satisfaction and happiness from the existence of intact forests that provide much-needed habitat for late-successional forest associated wildlife species. Ensuring the continued existence and distribution of such species is of the utmost importance to me and has directly influenced much of my personal and professional life. My interest in intact forests and the species that rely on those forests would be directly harmed should the late successional and mature trees targeted for logging be removed from the forest ecosystem.

8. The proposed logging on BLM lands will remove trees and forest stands that I rely upon in my professional and personal capabilities. I am particularly worried about the BLM's plan to increase fire hazard by replacing mature fire-resilient forest stands with dense young tree plantations.

9. Most recently I visited the proposed Lower Grave timber sale and road construction location on July 5, 2017. In a professional or recreational capacity, I have visited the Lower Grave timber sale area at least 4 times since 2014. I have a concrete plan to return to the Lower Grave timber sale area in May 2018.

10. In the course of my visits, I have taken several photographs that illustrate examples of trees and forest attributes whose removal will harm the interests of myself and KS Wild. I declare that the photos are true and accurate representations of what I observed in the proposed Lower Grave timber sale units.

11. Exhibit 1, a photograph taken on July 5, 2017, illustrates a complex fire-resilient old-growth forest that is scheduled for "regeneration harvesting" as unit 3-2A of the Lower Grave timber sale. In my 20 years of professional experience monitoring federal timber sales, it is my

experience that these are the type of forest stands that BLM planners contend provide shade, wildlife habitat, structural complexity and canopy cover to the forest. In my experience, these are the types of forest stands that BLM fire management and wildlife policies are often designed to create or retain.

12. Exhibit 2, a photograph taken on July 5, 2017, also illustrates a complex fire-resilient old-growth forest that is scheduled for “regeneration harvesting” as unit 3-2A of the Lower Grave timber sale. In my 20 years of experience monitoring federal timber sales, it is my experience that these are the type of forest stands that BLM planners contend provide shade, wildlife habitat, structural complexity and canopy cover to the forest. In my experience, these are the types of forest stands that BLM fire management and wildlife policies are often designed to create or retain.

13. Exhibit 3, a photograph taken on July 5, 2017, illustrates a large-diameter old-growth pine tree that has been marked by the BLM to facilitate logging road construction in T33S-505W § 34 accessing Lower Grave timber sale logging units. In my 20 years of professional experience most federal land managers seek to retain large-diameter old-growth pine trees due to their resiliency to both fire and drought and due to their disproportionate value to late-successional associated wildlife species.

14. Exhibit 4, a photograph taken on March 28, 2013, illustrates red flagging placed in an old-growth forest stand indicating the location of proposed logging road construction in T33S-505W § 34 accessing Lower Grave timber sale logging units. In my 20 years of professional experience, I have observed dozens of federal land managers sign timber sale decision documents that protect or avoid old-growth forests located on rock talus slopes in order to protect this habitat type.

15. Exhibit 5, a photograph taken on March 28, 2013, illustrates a large-diameter old-growth cedar tree that has been marked by the BLM to facilitate logging road construction within Lower Grave timber sale logging unit 34-2B. The fire scar present on the old-growth cedar evidences the existing fire-resilience of larger diameter trees in the proposed road construction right-of-way and within proposed logging units.

16. Exhibit 6, a photograph taken on March 28, 2013, illustrates KS Wild staff standing on BLM lands adjacent to proposed Lower Grave logging unit 34-2B that were subject to old-growth removal and conversion into a second-growth tree plantation. In the years since this silvicultural prescription was implemented, the slash pile in the foreground was never burned or removed by the BLM or its timber sale contractors. The Lower Grave timber sale would continue and expand this practice of removing old-growth forests, creating slash piles, and establishing second-growth tree plantations, all practices which increase, rather than decrease forest fire hazard.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of March, 2018, in Ashland, Oregon.



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GEORGE SEXTON  
Conservation Director, KS Wild