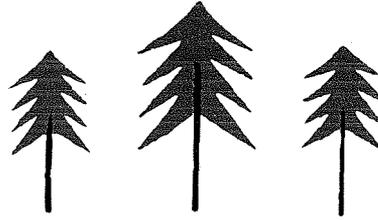


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Aimee Hoefs
BLM Coos Bay District BLM
1300 Airport Lane
North Bend, Oregon 97459

Re: Wagon Road Pilot Environmental Assessment

Dear Ms Hoefs:

In response to the Coos Bay Wagon Road Pilot scoping notice the Association of O&C Counties previously reviewed this project and submitted comments to your office. Please reference this letter as it has a direct relationship to our comments on the Wagon Road draft environmental assessment.

The Wagon Road Pilot proposed action as articulated in the draft EA provides for a variable retention harvest as designed by Drs. Franklin and Johnson. It is responsive to the purpose and need for implementing projects for moist forests in the Oregon Coast Range planning area. It provides timber sale volume towards the Coos Bay Allowable Sale Quantity as required by the O&C Act of 1937. If implemented, the project will provide jobs, promote economic growth in communities and generate revenue for the benefit of Coos and Douglas Counties. It provides for conservation of federally proposed and listed species under the Endangered Species Act. It also meets water quality standards as required by the Clean Water Act.

The proposed action fulfills the Secretary's direction to demonstrate the application of principles developed for a variable retention regeneration harvest. The draft EA, however, is incomplete and does not contribute to helping inform decision makers about applying these principles in the future on O&C and CBWR lands. With the exception of the No Action alternative the EA does not analyze other alternatives to the proposed action. The ecological principles set forth by Drs. Franklin and Johnson are worthy of investigating but they should be examined by comparing their approach to other forest management harvest strategies. The proposed action is not consistent with timber management standards and guidelines provided for the Matrix or Timber Management Area land use allocations described in the NWFP or WOPR. For example, the 1995 Coos Bay RMP (p. 53) requires after a regeneration harvest the retention of 6 to 8 trees per acre. The Coos Bay 2008 RMP (p. 37) requires no retention of trees and the removal of all merchantable material from the harvest unit. In addition, standards and guidelines established in the NWFP for Survey and Manage Species are not applicable in the 2008 RMP. The O&C Act and Sec. 701(b) of FLPMA do not allow for special management of Survey and Manage species that have not been proposed or listed under the Endangered Species Act. Based on these laws the BLM has no legal authority to apply special

management and protection measures for Red Tree Voles found on O&C and CBWR lands. These plans also have different boundaries and management guidelines for riparian areas.

In addition to the no action alternative (not a viable O&C Act alternative), the EA needs to include additional alternatives that meet the management direction described in the above plans. There needs to be a comparative analysis of all reasonable alternatives including the proposed action to understand the effects of each. For example, what is the projected timber sale volume and what are the environmental and economic consequences of timber harvest for each alternative including the proposed action. Also, what are the environmental and economic consequences that would result from different timber management approaches in riparian areas? The EA needs to demonstrate how these CBWR lands can be best managed to achieve continuous timber production that can be sustained through a balance of growth and harvest as required by the O&C Act.

If you have any questions please contact me at 541-412-1624, rocky@blupac.com or Van Manning at 253-549-0074, vanbonmanning@comcast.net.

Sincerely



Rocky McVay
Executive Director
Association of O&C Counties