

**From:** [m1allen@blm.gov](mailto:m1allen@blm.gov) on behalf of [RMPs\\_WesternOregon\\_BLM\\_OR](#)  
**To:** [RMP-Comments@heg-inc.com](mailto:RMP-Comments@heg-inc.com)  
**Subject:** Fwd: FW: Draft Resource Management Plans for Western Oregon  
**Date:** Tuesday, July 21, 2015 10:38:05 AM  
**Attachments:** [BLM O&C Draft Resource Management Plans.pdf](#)

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**Resource Management Plans for Western Oregon  
Bureau of Land Management**  
**web:** [www.blm.gov/or/plans/rmpswesternoregon](http://www.blm.gov/or/plans/rmpswesternoregon)

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**From:** **Sue Becraft** <[sbecraft@co.tillamook.or.us](mailto:sbecraft@co.tillamook.or.us)>  
**Date:** Wed, Jun 10, 2015 at 1:22 PM  
**Subject:** FW: Draft Resource Management Plans for Western Oregon  
**To:** "[BLM\\_OR\\_RMPs\\_WesternOregon@blm.gov](mailto:BLM_OR_RMPs_WesternOregon@blm.gov)"  
<[BLM\\_OR\\_RMPs\\_WesternOregon@blm.gov](mailto:BLM_OR_RMPs_WesternOregon@blm.gov)>, "[Riley.Bushue@mail.house.gov](mailto:Riley.Bushue@mail.house.gov)"  
<[Riley.Bushue@mail.house.gov](mailto:Riley.Bushue@mail.house.gov)>  
**Cc:** Bill Baertlein <[bbaertle@co.tillamook.or.us](mailto:bbaertle@co.tillamook.or.us)>, Mark Labhart  
<[mlabhart@co.tillamook.or.us](mailto:mlabhart@co.tillamook.or.us)>, Tim Josi <[tjosi@co.tillamook.or.us](mailto:tjosi@co.tillamook.or.us)>, Paul Levesque  
<[plevesqu@co.tillamook.or.us](mailto:plevesqu@co.tillamook.or.us)>, "'Nick Smith' ([nick@healthyforests.org](mailto:nick@healthyforests.org))"  
<[nick@healthyforests.org](mailto:nick@healthyforests.org)>

Please find a letter attached that the Tillamook County Commissioners signed at their regular board meeting this morning expressing their concern about the Bureau of Land Management's draft Resource Management Plans for Western Oregon.

Sue Becraft

Board Assistant

Tillamook County Commissioners

Phone: 503-842-3403



*Land of Cheese, Trees and Ocean Breeze*

Board of Commissioners  
Tim Josi, Mark Labhart, Bill Baertlein  
201 Laurel Avenue  
Tillamook, Oregon 97141  
Phone 503-842-3403  
Fax 503-842-1384  
TTY Oregon Relay Service

June 10, 2015

RMPs for Western Oregon  
Bureau of Land Management  
PO Box 2965  
Portland OR 97208

RE: Draft Resource Management Plans for Western Oregon

Bureau of Land Management  
Senator Ron Wyden  
Senator Jeff Merkley  
Representative Kurt Schrader  
Representative Suzanne Bonamici  
Representative Earl Blumenauer  
Representative Peter DeFazio  
Representative Greg Walden

This letter is to express our concern about the Bureau of Land Management's draft Resource Management Plans for Western Oregon. As Commissioners who support the many benefits timber management provides our communities and forests, we believe the draft plans all take our "O&C" lands in the wrong direction.

In order for us to respond appropriately to the draft Resource Management Plans for Western Oregon, we will need additional time. We are requesting an extension of time in the BLM's planning process for the O&C lands. The BLM issued a 1500+ page draft environmental impact statement/resource management plan, and allowed 90 days for public comment. We are asking for an additional 120 days, until November 20.

Western Oregon's O&C forests were established with a clear legal mandate. By law, these forests are intended to be managed under sustained-yield harvest practices for the benefit of our counties and communities. Though these forests are growing the equivalent of 1.2 billion board feet per year, yet the alternatives offered by the BLM largely maintain the anemic harvest levels of the past two decades. In fact, the BLM's Bureau of Land Management preferred plan would actually reduce allowable harvest levels and more than double the land in late-successional reserves. This is not balanced.

Senator Ron Wyden  
Senator Jeff Merkley  
Representative Kurt Schrader  
Representative Suzanne Bonamici  
Representative Earl Blumenauer  
Representative Peter DeFazio  
Representative Greg Walden  
June 10, 2015  
Page 2

We have seen the impacts of the current approach to O&C forest management. Environmental lawsuits and federal bureaucracy have tied the hands of BLM staff on the ground. As a result, our forests have become more vulnerable to wildfire, insects and disease. The steep decline in timber harvests has contributed to business closures and high unemployment. The draft Resource Management Plans do nothing to solve these problems.

For these reasons, we do not support the BLM's draft Resource Management Plans and need more time to detail our reasons. It's time for congressional action on a solution that honors the O&C Act, improves forest health and puts rural Oregon back to work.

Sincerely,

BOARD OF COMMISSIONERS FOR  
TILLAMOOK COUNTY, OREGON

  
\_\_\_\_\_  
Tim Josi, Chair

  
\_\_\_\_\_  
Mark Labhart, Vice-Chair

  
\_\_\_\_\_  
Bill Baertlein, Commissioner

cc: O&C Counties – Rocky McVay

**From:** [m1allen@blm.gov](mailto:m1allen@blm.gov) on behalf of [RMPs\\_WesternOregon\\_BLM\\_OR](#)  
**To:** [RMP-Comments@heg-inc.com](mailto:RMP-Comments@heg-inc.com)  
**Subject:** Fwd: Letter of Comment from Jackson County, Oregon, Board of Commissioners  
**Date:** Tuesday, July 21, 2015 1:12:45 PM  
**Attachments:** [image002.png](#)  
[2015\\_07\\_15\\_RMP\\_EIS\\_signed.pdf](#)

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**Resource Management Plans for Western Oregon  
Bureau of Land Management**  
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**From:** **BOC-CAO\_ADMIN** <[BoC-CAO\\_Admin@jacksoncounty.org](mailto:BoC-CAO_Admin@jacksoncounty.org)>  
**Date:** Wed, Jul 15, 2015 at 2:21 PM  
**Subject:** Letter of Comment from Jackson County, Oregon, Board of Commissioners  
**To:** "[BLM\\_OR\\_RMPs\\_WesternOregon@blm.gov](mailto:BLM_OR_RMPs_WesternOregon@blm.gov)"  
<[BLM\\_OR\\_RMPs\\_WesternOregon@blm.gov](mailto:BLM_OR_RMPs_WesternOregon@blm.gov)>

Attached please find a letter from the Jackson County, Oregon Board of Commissioners.

This letter has also been sent via Certified Mail.

Sincerely,

*Loris Fenner*

Executive Secretary

Board of Commissioners

10 S. Oakdale, Room 214

Medford, OR 97501

541-774-6004

[FennerLM@jacksoncounty.org](mailto:FennerLM@jacksoncounty.org)



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# JACKSON COUNTY

Oregon

## Board of Commissioners

Rick Dyer (541) 774-6118  
Doug Breidenthal (541) 774-6119  
Colleen Roberts (541) 774-6117  
Fax: (541) 774-6705

10 South Oakdale, Room 214  
Medford, Oregon 97501

July 15, 2015

VIA CERTIFIED MAIL AND EMAIL

RMPs for Western Oregon  
Bureau of Land Management  
Mr. Jerome Perez, State Director  
P.O. Box 2965  
Portland, Oregon 97208  
BLM\_OR\_RMPs\_WesternOregon@blm.gov

Dear Mr. Perez:

Please accept this letter as Jackson County's comments on the Bureau of Land Management's ("BLM") Draft Western Oregon Resource Management Plan ("RMP")/Environmental Impact Statement ("EIS"). Unfortunately, as the County was not permitted to participate in the creation of the Draft RMP/EIS as a cooperating agency under the National Environmental Protection Act ("NEPA"), this is the County's first opportunity to provide comment on the RMP/EIS. Additionally, the initially announced public comment period of only 90 days is an extremely short period of time for any entity to digest and comment upon a document as lengthy, wide ranging, and consequential as the Draft RMP/EIS. This short period of time for review is particularly difficult for the County, as the County was also excluded from the coordination process under the Federal Land Policy and Management Act ("FLPMA"). Given the RMP's potential impacts to the County, its plans and policies, its citizens, its economy, and its environment, the mere 90 days initially authorized to review the draft RMP/EIS was insufficient. The brief extension of the public comment period to August 21, 2015 still does not provide sufficient opportunity for Jackson County to thoroughly review and comment on the extensive impacts to the County that the adoption of this draft as the final RMP would impose. By excluding Jackson County from the coordination and cooperating agency process and by declining to consider the County's plans and policies, BLM failed to adequately consider and address those impacts in the Draft RMP/EIS and failed to comply with FLPMA and NEPA.

FLPMA requires BLM to coordinate with local governments, to keep apprised of local government plans and policies, provide for meaningful involvement of local officials, and to attempt to reconcile any inconsistencies between BLM's proposed action, and the local government's plans. Under FLPMA, BLM:

shall . . . coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of . . . local governments within which the lands are located . . . by, among other things, considering the policies of approved State and tribal land resource management programs. In implementing this directive, the Secretary shall, to the extent he finds practical, keep apprised of State, local, and tribal land use plans; assure that consideration is given to those State, local, and tribal plans that are germane in the development of land use plans for public lands; assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans, and shall provide for meaningful public involvement of State and local government officials, both elected and appointed, in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant

impact on non-Federal lands. Such officials in each State are authorized to furnish advice to the Secretary with respect to the development and revision of land use plans, land use guidelines, land use rules, and land use regulations for the public lands within such State and with respect to such other land use matters as may be referred to them by him. Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act.

43 U.S.C. § 1712(c)(9). There is no evidence in the Draft RMP/EIS whatsoever that BLM attempted to coordinate with the County, provide for meaningful input from Jackson County's officials, kept apprised of Jackson County's local plans or policies during the creation of the Draft RMP/EIS, or attempted to reconcile inconsistencies between the proposed action and the County's plans and policies.

Further, FLMPA's implementing regulations contain additional and more specific provisions for input from and consideration of a local government's plans, policies, and laws. These regulations are designed to ensure that the BLM coordinates with local governments and accounts for local plans and policies with an aim to harmonize federal plans with those of affected local entities. For instance, 43 C.F.R. § 1610.3-1 provides, among other things, that BLM keep apprised of non-BLM plans, assure that BLM consider germane local plans, assist in resolving inconsistencies between federal and local plans, provide for meaningful involvement from local government officials, collaborate and cooperate with local governments, and provide affected local governments with the opportunity to review, prepare, and respond to BLM plans beyond what is available to members of the public. See also, 43 C.F.R. § 1601.0-2 (ensuring the participation in planning by local governments); 43 C.F.R. § 1610.3-2 (providing for consistency, where practicable, between RMPs and local government plans and policies and requiring BLM to keep apprised of such plans and policies); 43 C.F.R. § 1610.4-1 (providing for participation from local governments "at the outset of the planning process"); 43 C.F.R. § 1610.4-2 (providing for coordination with local governments); 43 C.F.R. § 1610.4-4 (providing for consistency with the policies, plans, and programs of local governments); 43 C.F.R. § 1610.4-7 (providing for enhanced participation from local governments).

Thus, BLM was required to not only coordinate with the County as an affected local government, but was also required to take into account the County's plans, programs, and policies. Importantly, FLMPA's requirements to coordinate with local governments are independent from its mandate to account for local government plans and policies. Here, BLM failed on both counts. The County was excluded from coordination and in-so-far as there is not a single reference to any Jackson County plan, policy, or program in the Draft RMP/EIS, it does not appear that BLM kept apprised of, much less attempted to resolve any inconsistencies with Jackson County's plans and policies. Included amongst the plans and policies BLM should have accounted for are Jackson County's Federal Coordination Policy, the County's Natural Hazard Mitigation Plan, the Jackson County Integrated Fire Plan (this plan constitutes the County's Community Wildfire Protection Plan), the County's Emergency Operations Plan, and the County's Comprehensive Plan.

NEPA also contains provisions for cooperation with and consideration of input from local governments as well as consideration of a local government's plans, policies, programs, and laws. NEPA's stated purpose is for:

the Federal Government, in cooperation with State and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans.

42 U.S.C. § 4331(a). NEPA's implementing regulations contain specific provisions to ensure that federal agencies participate with local governments to meet the Act's goals. For instance, 40 C.F.R § 1506.2, provides that federal agencies "shall cooperate with . . . local agencies to the fullest extent possible." That cooperation should include joint planning, joint research and studies, joining public hearings, joining environmental assessments, consideration of local plans, policies, laws and efforts to resolve inconsistencies between local plans and the BLM's proposed actions. Id.; see also, 40 C.F.R § 1501.6 (providing for cooperating agencies).

As with FLMPA, BLM failed to comply with NEPA's provisions with regard to Jackson County in the preparation of the Draft RMP/EIS. BLM did not cooperate with the County to "the fullest extent possible" but instead excluded the County from the process. Importantly, BLM also failed to consider, much less attempt to resolve inconsistencies with the County's plans and policies. Included amongst those plans and policies are Jackson County's Federal Coordination Policy, the County's Natural Hazard Mitigation Plan, The Jackson County Integrated Fire Plan (this plan constitutes the County's Community Wildfire Protection Plan), The County Emergency Operations Plan, and the County's Comprehensive Plan.

Thank you for the opportunity to comment on the Draft RMP/EIS. However, in our view, the BLM has failed to coordinate or cooperate with the County outside of this public comment period and has failed to account for the RMP's impacts on the County, its plans and policies, its citizens, its economy, and its environment. In our view, BLM should restart its analysis of the RMP, should coordinate with the County, should include the County as a cooperating agency, and should consider, incorporate, and resolve inconsistencies with affected County plans and policies before making any final decisions.

Sincerely,



Doug Breidenthal, Chair  
Board of Commissioners

cc: Rick Dyer, Commissioner  
Colleen Roberts, Commissioner  
County Administrator  
County Counsel  
Senator Jeffery A. Merkley  
Senator Ron Wyden

Representative Earl Blumenauer  
Representative Suzanne Bonamici  
Representative Peter A. DeFazio  
Representative Kurt Schrader  
Representative Greg P. Walden