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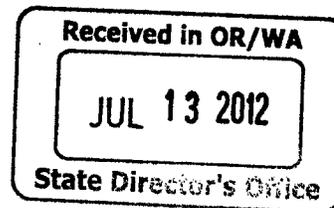
JACKSON COUNTY

Oregon

Board of Commissioners

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10 South Oakdale, Room 214
Medford, Oregon 97501



July 11, 2012

Mr. Mike Mottice
Acting State Director
Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

RE: Response to the Bureau of Land Management (BLM) request for scoping comments for the preparation of new Resource Management Plans (RMP) for Western Oregon Districts

Dear Mr. Mottice:

The Jackson County Commissioners request that the BLM recognize the importance of goals in the new RMPs that reflect an approach to the management of lands and resources under their jurisdiction that balance the protection of critical habitats with the maintenance of diverse, resilient, and sustainable ecosystems.

We feel that in order for the RMPs to achieve diverse, resilient, and sustainable ecosystems on the ground, the BLM will need to perform active and objective-based management on a greater proportion of the forests and rangelands that it manages than has been done since before the implementation of the Northwest Forest Plan (NWFP). Achieving diverse, resilient, and sustainable ecosystems is very complex when considering the need to protect and enhance threatened and endangered species with the knowledge that the ecosystem and its habitats function stochastically with a diversity of species and age classes over time.

In recent decades, federal forests have decreased in resilience and health with excessive horizontal and vertical vegetation densities and species mixtures that are out of balance. A combination of factors occurring in the last several decades, such as the implementation of aggressive fire control, loss of the use of herbicide treatments on younger vegetation types, and a reduction of active forest management across most landscapes are some of the contributors to this decline. The overall result of less resilient and unhealthy forests is that most of the forests are at an extremely high risk of loss to wildfire. Noxious species are increasing in numbers and becoming very difficult to combat. Additionally, some very important forest species populations, such as ponderosa pine, are declining due to intense competition for basic resources such as moisture and sunlight. These factors and others, coming under the title of "Climate Change," point to the need to redouble forest management efforts across more of the landscape to allow forest ecosystems to become more resilient.

If the BLM continues to promote the forest management principles as proposed by Jerry Franklin and K. Norman Johnson, which appears to be the case, it would be our recommendation that

more harvests occur that represent a greater share of the forest types and conditions across the various forest landscapes. These harvests would allow a broader representation of the success or failure of various silvicultural prescriptions and operational systems against actual results. The increased harvest levels would also produce a larger income to the U.S. Treasury and to the counties.

In addition, we recommend that the BLM:

- Thoroughly analyze the cost and benefits of using various harvest systems for timber sales, including those which require the use and construction of additional, well located, and engineered, roads.
- Develop methods to implement Stewardship planning and budgeting that produce more income return to the BLM and the sponsoring district.
- Continue to study and develop means for the utilization of biomass for energy production.
- Do everything in its power to coordinate with other agencies to streamline the processes and timelines for the clearance of threatened, endangered, and special-interest species for projects such as timber harvests.
- Continue to aggressively perform strategic fuel reductions in areas of high to extreme fire risk and near Urban-Wildland forest interface areas. Areas that have been treated have proven to be successful in stopping or modifying the damage done by wildfires. Continuation of agreements for fire suppression with the Oregon Department of Forestry is encouraged.
- Continue to aggressively identify and pursue the eradication of noxious species and to coordinate those activities with other federal, State, county, and local agencies and cooperatives.
- Take every opportunity to coordinate all land management planning and project activities with Federal, State, County, local agencies, cooperatives, and have an active role with the Watershed Councils.
- Work with its Department Legal Counsel and other legal experts to analyze procedures and strategies that may result in reducing the number of appeals and litigation to its proposals.

Sincerely,



Don Skundrick, Chair
Board of Commissioners

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**Board of County
Commissioners**

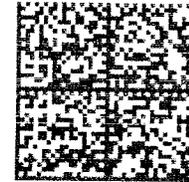
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