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RECEIVED

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January 9, 2008

Mr. Ed Shepard, State Director OR/WA  
Bureau of Land Management  
P.O. Box 2965  
Portland, Oregon 97208

Re: Western Oregon Plan Revision EIS comments

Mr. Shepard:

We appreciate the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management Districts (WOPR). As you know, Benton County is a cooperator separate from the Association of O&C Counties (Benton County is not a member of the Association).

On behalf of Benton County, my comments will focus more on observations and general recommendations rather than a specific alternative. My colleagues and I represent diverse community interests and scientific opinion and have received considerable commentary on the WOPR DEIS.

Management focused on forest health and resiliency should be a major factor considered in any plan revisions. Management considerations must include looking at the ecosystem as a whole with focus on soil dynamics, hydrology, water function, air quality and multiple forest uses in addition to timber productivity. Healthy and resilient forests can provide for multiple values including timber harvest. There is concern that the focus on timber production greatly outweighs the functions that contribute to forest health and resiliency; that these functions do not seem to be as important.

We recognize that the Bureau's plan revisions are in response to a settlement agreement centered on the 1937 O&C Act. We have not had the luxury of an in-depth legal review or interpretations thereof. Nevertheless, we propose that an interpretation of the Act should not be so narrow; the Act focused primarily on timber production, overshadows other values so thus the difficulty in making the case that protecting watersheds and streams and providing recreational opportunities have importance. I'm

not convinced that the Clean Water and Air Acts and other legislation should not be considered when interpreting the 1937 Act.

We acknowledge that harvest receipts, or county payments, are the lifeblood of several O&C Counties. Nevertheless, it is not likely that harvests would be restored to historic high levels. We have to find a way to reach a new compact with the federal government that will provide some sort of compensation for significant land acreage exemptions from tax rolls. We do not believe that timber harvest is the only answer. We also recognize that this is outside the plan revision process.

We ask the question, has enough time been given to assess the success or failure of the 1994 Northwest Forest Plan (NWFP) for managing Westside forests in Oregon? We suspect not. We know that the debate continues on whether or not O&C lands should be managed under the NWFP; however, consistent forest management of federal forests should be a goal for our federal agencies. Shared practices and current science can enhance efforts. In my years in forestry research, I learned that longitudinal data are needed to evaluate success or failure; that management prescriptions come from a combination of trial and error and good science. I personally am not convinced that the NWFP was given sufficient time. Instead it was caught in the middle of competing political interests and litigation.

Finally, we are concerned that the debate over the preferred alternative or other alternatives will not abate litigation. In fact, it may lead to more.

In the interest of cooperation we recommend:

- Plan revisions include multiple use sustained yield of forest ecosystem services, rather than management tightly directed at short-term economic return at the expense of long term productivity of the forest as a whole, which might go further in gaining support for plan revisions. In the work of the Federal Forestlands Advisory Committee (for the Oregon Board of Forestry) we have struggled with the complexities of managing the nation's federal forest lands. There appears to be some agreement, however, that restoring forest health and resiliency must be a focus and that harvest as well as restoration is an important component of that effort. Restoring forest health and resiliency will also help combat catastrophic wildfire events. Stewardship and management can be synonymous.
- Expanding economic measures of success to include other values such as those achieved by the requirements of the Clean Water and Air Acts, enhancement of fisheries, recreation, and other forest products.
- Addressing carbon storage; learning more about carbon pluses and minuses. What is the optimum carbon balance?
- Allowing more time and effort in implementing and evaluating the Northwest Forest Plan to provide coordination between federal agencies with the hopeful result of more stability and predictability regarding the management of federal forest lands (including the 2.6 million acres of BLM managed forests in Oregon).

- Proposing a selection of alternatives based on specific landscape features (such as on a basin or province scale).
- Considering the potential consequences of climate change over time and how forests should be managed in response to such change. Should there be some “adaptive management” strategies to consider climate change? And what might they be?
- Working to reach some agreement on the language we use in forest management. This will not be an easy task, as it became very clear to me during the most recent meeting of the Federal Forestlands Advisory Committee’s discussion on how to define or characterize older forests. If industry and academic professionals, foresters and conservationists struggle over this, it is clear that the general public will be confused and struggle even more.
- Providing a public process to discuss and assign relative value to the many dimensions of our forests. Certainly, the revenue produced to support local government is important, but that dimension must be weighed and valued with others such as recreation, habitat, clean air and clean water.
- Building broader community support to reduce the polarization that has led to litigation. It is important that there be parity of information– that is communities need to hear all sides of the debate and be asked to engage in finding solutions. I don’t think that we can ignore a political environment that also includes aesthetic values attached to forests. We have to find a way to manage for diverse community values.

We sincerely hope that you will find our comments useful.

Again, we thank you for the opportunity to comment. We recognize that there will be another opportunity as the Bureau refines the proposed plan.

Sincerely,

  
Annabelle Jaramillo  
Commissioner

cc. Commissioner Jay Dixon  
Commissioner Linda Modrell