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BOARD OF COUNTY COMMISSIONERS

PUBLIC SERVICES BUILDING

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December 20, 2007

Edward Shepard
OR/WA State Director
Western Oregon Plan Revisions
Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

Re: Western Oregon Plan Revisions

Dear OR/WA State Director Shepard:

We, the Clackamas County Commissioners, have reviewed the Draft Environmental Impact Statement (DEIS) for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management Districts. We appreciate the work that has gone into the WOPR process over the past few years, including scoping, development of alternatives, and the detailed analysis of effects described in the DEIS. The workshops, open houses, and web site information available since the release of the DEIS and the extended comment period are evidence of your commitment to informing the public and cooperating agencies while giving adequate time for thoughtful commentary.

After review and consideration of anticipated effects of each proposed alternative, we would like to lend our support to Alternative 2. Of the proposed alternatives, we believe that Alternative 2 best meets the intent of the O&C Lands Act of 1937 for these lands to be managed in permanent forest production under the principles of sustained yield providing economic benefit to local communities. We believe that Alternative 2 proposes a management scheme that will grow and produce forest products in a sustainable manner while protecting other resource values such as wildlife, fish, and clean water. The income to Clackamas County via payments from timber receipts is important for providing some local county services in our county as well as the other O&C counties. We have adopted a resolution in support of Alternative 2, a copy of which is included and which has been transmitted to the Association of O&C Counties.

While we support the selection of Alternative 2, we would like to point out some particular concerns we have identified through discussion with County staff and citizens.

Concern 1: Identification of revenue replacement for the Secure Rural Schools and Community Self Determination Act safety net payments is important.

Clackamas County is supportive of identifying revenues to replace the anticipated loss of Secure Rural Schools funding, but it is also important that projects be implemented in a way sustainable to both the timber harvest and the other resources the forest provides. We would ask the BLM to encourage all of the O&C counties to continue to look at other potential sources of revenue including revenue generated through tourism and recreation.

Concern 2: Revenues from the timber harvest on BLM land could be processed under "Stewardship Contracts" and would not be returned to the Counties.

While we recognize that stewardship contracting is a good tool in the right situation, we are concerned that it would reduce the revenue generated from timber harvest and thus reduce the portion of revenue returned to the Counties. If stewardship contracting is used to implement some resource management projects, the Counties should still receive an equal amount of revenue as they would have with a traditional timber sale.

Concern 3: Protection of endangered species habitat and improving forest health is critical.

Clackamas County supports harvesting of timber when it is balanced with science-based protection of endangered species. Managing of public forests should be conducted in a sustainable and ecologically sound manner. We strongly support and encourage focusing on thinning of plantation stands, which would help to address fuel reduction concerns in fire-prone and over-stocked plantation areas.

Concern 4: Adequate riparian buffer areas are important for protection of fish, water, wildlife, and soil resources.

While we support Alternative 2, we are concerned that the minimum riparian widths may be applied to all projects. Each forest management project should be reviewed on an individual basis so that the appropriate riparian corridor width is applied to each site. We have particular concern in areas of unstable slopes and soils. It is important that the minimum protection width is not relied upon as the standard, but instead the appropriate protection be applied on a site-by-site basis.

Concern 5: Timber harvest on properties adjacent to small private landowners can be controversial.

Some of the BLM-managed lands in Clackamas County are in smaller tracts scattered in the western foothills of the Cascades. Many of these tracts border properties owned by private, rural landowners. As you know, these neighbors can be very sensitive to management activities, especially timber harvest. An article in the August 16, 2007 Clackamas County Weekly section of *The Oregonian* titled "Living – for now – in paradise" described some of the issues arising from management of small BLM parcels in the rural landscape of eastern Clackamas County. Our Clackamas County Forest Program has made it a point to contact and work with neighboring landowners when proposing timber harvest on our county-owned forest lands. This has been a successful strategy for several years. We suggest that Salem District planners employ this strategy when proposing timber harvest on BLM-managed lands adjacent to smaller, private landowners. We would be happy to provide contact information for those adjacent landowners in Clackamas County to Salem District planners.

Thank you for extending the public comment period and giving us the opportunity to comment on the DEIS. We look forward to finalization of the western Oregon resource management plan revisions and subsequent implementation of the selected alternative.

Sincerely,



Martha Schrader, Chair
Clackamas County Board of Commissioners