



KLAMATH COUNTY
Home of Crater Lake
Klamath County Commissioners

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Al Switzer, Commissioner
Position One

John Elliott, Commissioner
Position Two

Bill Brown, Commissioner
Position Three

January 4, 2008

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Mr. Edward W. Shepard, State Director
USDI Bureau of Land Management
Western Oregon Plan Revisions
PO Box 2965
Portland, OR 97208

Dear Mr. Shepard:

The Klamath County Board of Commissioners provided comment on your Western Oregon Plan Revisions on October 30, 2007. Since that date we have become aware of the possible implications of the United States Supreme Court's decision in "National Association of Homebuilders v. Defenders of Wildlife" of June 25, 2007. This decision states that Section 7 of the Endangered Species Act's "...no jeopardy duty covers only discretionary agency actions and does not attach to actions that an agency is required by statute to undertake once certain specific triggering events have occurred..."

In our October 30 comment we encouraged a larger allocation of acres to timber production than the 48 percent your Alternative Two indicated while generally supporting your selection of Alternative Two as your Preferred Alternative. The recent Supreme Court decision now reinforces the requirements of the original O&C Act to manage the O&C lands primarily for timber production for economic benefit of the counties in which the O&C lands lie.

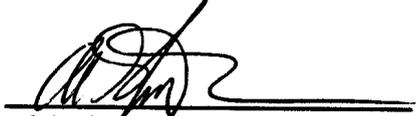
We continue to encourage timber management and production on a far larger acreage than suggested in your Alternative Two and perhaps a larger acreage than the 66 percent indicated in your Alternative Three. We maintain that land may be managed under the rotation age regime (90/140 years) you suggest in such a manner that essential habitat for listed and other species is protected, if not enhanced, while a large volume of valuable forest products is produced. The ten-year allowable sale quantity indicated in Alternative Two, 7,270 MMBF, could be safely exceeded if more acres were available for wood harvest, keeping growth and cut in balance over the span of the decadal planning period.

As always, it's essential that all resources and species be considered as land management plans are written and executed. We believe it is entirely possible to engage in careful, long-rotation timber management on the largest land-base possible that protects and enhances all resources without excluding commercial use from large portions of public land.

We are very interested in your response to our comments and others that consider the effects of the Supreme Court's decision. We encourage the production of a new Preferred Alternative that takes this decision into consideration and includes far more economic timber production in Oregon's timber-dependent counties.

We very much appreciate this opportunity to comment on your Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management Districts.

Very truly yours,



Al Switzer, Chairman



Bill Brown, Commissioner



John Elliott, Commissioner