

## Hugo Neighborhood Association & Historical Society

3388B Merlin Road #195  
Grants Pass, Oregon 97526  
541-471-8271

Email: [hugo@jeffnet.org](mailto:hugo@jeffnet.org)

Web Page: <http://www.hugoneighborhood.org/>

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Michael Mottice, Associate State Director  
BLM Oregon  
P.O. Box 2965  
Portland, OR 97208  
503-808-6026  
Email: [ORwaland@blm.gov](mailto:ORwaland@blm.gov)



Mike Haske, Deputy State Director, Resource Planning, Use & Protection  
BLM Oregon  
P.O. Box 2965  
Portland, OR 97208  
503-808-6056  
Email: [ORwaland@blm.gov](mailto:ORwaland@blm.gov)

Reference: Education, Outreach, And Management Allocations For BLM-Administered Rural Interface Lands In The BLM Resource Base Below 2,000' For Western Oregon

Dear Michael and Mike:

I am interested in initiating a private informal exploratory dialogue concerning a public BLM education and outreach program for BLM-administered lands in the resource base that, in Western Oregon BLM districts, are also allocated to Rural Interface Lands (RIAs). In a nut-shell I believe there are opportunities through the State of Oregon's land use planning system, especially through Oregon Statewide Goal 4 - Forest Land, for BLM to cooperate and collaborate with local governments, and especially private landowners adjacent to, or nearby, BLM resource lands located below approximately 2,000' (Appendix A). I write you in my capacity as an individual, and volunteer for several different Oregon land use groups involved mostly in the allocation of lands within the State of Oregon's private land use planning system.

In translation this means that in large part we testify to preserve and protect existing private resource lands in their present allocation status for the purpose of protecting farm and forest lands. This objective normally does not include low elevation BLM-administered lands allocated to resource management. We do not view this issue as a BLM operational management issue (i.e., BLM project-level actions); we see it as a Western Oregon BLM allocation issue. For example, it is not about the seemingly never ending conflict over BLM project-level actions that can shift with a new Federal Executive Branch and Executive Departments.

I believe some of the benefits of such a program to BLM would be the development of a neighborhood base that supports the management allocation for BLM-administered lands in their communities (i.e., strive for a common vision on the allocation prescription of BLM-administered RIA resource lands). I have several personal experiences working with neighborhood groups where I believe an active BLM role would have facilitated this common vision. If interested, I could provide a couple of the neighbors' specific written arguments that I believe could be BLM's rudimentary arguments, and the basis for a common vision.

Another benefit is BLM sharing with local government decision-makers its vision concerning the allocation and management of RIA lands as there appears to me to be a disconnect between local governments' normal support for BLM project-level actions, and their normal support for an expanded private RIA land allocation base adjacent to, or nearby, BLM-administered public RIA resource lands. For example, I view local government's normal support of an expanded private RIA to be in conflict with their normal support of project-level BLM actions.

If implemented, I doubt this approach would quickly develop into a consensus around BLM alternatives and/or management with a majority of the public, stakeholders, and cooperating agencies, especially for project-level actions. However, I believe it has significant potential as an effective tool that BLM has management control over in beginning a local collaborative process toward the goal of a common land allocation vision. A BLM program could start small with an educational and outreach program applicable to all Western Oregon BLM districts with private and public RIAs (i.e., a focus on web publications that is potentially expanded to site specific "Oregon Statewide Goal 4 - Forest Land" testimony to local governments). By site specific actions I mean private land use proposals to change a local government's comprehensive plan allocations from resource to residential for lands adjacent to, or nearby, BLM-administered resource lands.

This idea is probably only applicable if BLM's strategy is to continue to manage low elevation BLM-administered resource lands versus eventually trading them out and concentrating on higher elevation lands away from the normal conflicts with private residential property owners.

I know that Steve Rouse, President of Rogue Advocates, supports the idea of collaborating with BLM through the Oregon land use planning system to promote and educate the public on the allocation prescriptions of BLM-administered resource lands. If this proposal proceeds beyond a private informal exploratory dialogue stage, I would lobby land use groups and associations to support the idea.

Thank you in advance for any consideration you can give to this matter. I can be reached at either 541-471-8271 or [hugo@jeffnet.org](mailto:hugo@jeffnet.org).

Sincerely,

Mike :)

Mike Walker, Education Chair  
Hugo Neighborhood Association & Historical Society  
3388B Merlin Rd #195  
Grants Pass, Oregon 97526  
541-471-8271  
Email: hugo@jeffnet.org  
Web Page: <http://www.hugoneighborhood.org/>

Mike Walker, Director/Vice-President  
Rogue Advocates, Affiliate of 1000 Friends of Oregon  
3388B Merlin Rd #195  
Grants Pass, Oregon 97526  
541-471-8271  
Email: hugo@jeffnet.org  
Web Page: <http://www.rogueadvocates.org/>

Mike Walker, Founding Director/Advisory Board Member  
*Goal One Coalition*  
3388B Merlin Rd #195  
Grants Pass, Oregon 97526  
541-471-8271  
Email: hugo@jeffnet.org  
Web Page: [www.goal1.org](http://www.goal1.org)

Email copies:

- Hugo Neighborhood Association & Historical Society
- Rogue Advocates
- Goal One Coalition

Dayne Barron, District Manager  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
541-618-22000  
Email: [Medford\\_Mail@blm.gov](mailto:Medford_Mail@blm.gov)

Mary Smelcer, Associate District Manager  
Medford District Office  
3040 Biddle Road  
Medford, OR 97504  
541-618-2440  
Email: [Medford\\_Mail@blm.gov](mailto:Medford_Mail@blm.gov)

**Appendix A. Interagency Cooperation and Collaboration** (Page 21 of 63, *Western Oregon Task Force, Final Report to the Secretary of Interior, July 22, 2010* )

Interagency Vision: The NWFP was an unprecedented effort by the Federal Government to develop a common vision for forest management of public lands in the Pacific Northwest. It was an attempt, by the highest levels of Government, to resolve natural resource conflict by addressing species conservation and habitat needs, while ensuring a sustainable flow of goods and services from Federal forests to help secure rural communities that depend upon those Federal lands for their livelihoods. Essential to successful implementation of the NWFP was a system of interagency governance composed of policy and implementation oversight teams ranging from the agency executives to staff. (Page 21 of 63, *Western Oregon Task Force*)

A common vision can provide the integration between the agencies' missions. For example, species conservation is a dominant feature under the ESA and is used as a measure in evaluating jeopardy. Land management agencies operating under FLPMA or NFMA have a conservation mandate. It is generally accepted that the O&C Act is subject to the ESA and hence has a conservation mandate as well. Illuminating the conservation component of these statutes is a way of harmonizing the agency missions to create a common vision. (Page 21 of 63, *Western Oregon Task Force*)

**The WOPR planning effort, and reaction to the ROD, calls attention to the perception that the Federal agencies and the public do not share a common vision on the management of the O&C lands and the lands encompassed by the NWFP. This lack of common vision creates tension and conflict in the development of project-level actions designed to meet the goals and expectations of the overlying plan. Tension and conflict, both with the WOPR and the NWFP, have been expressed through the time it takes to get projects through the ESA Section 7 consultation process, the lack of up-front collaboration in designing projects, and frequent litigation on project actions. Lack of commonly agreed upon standards and commitment to adhere to those standards for project design criteria stalls project consultations.** (emphasis added) (Page 21 of 63, *Western Oregon Task Force*)

There is a wide range of viewpoints on how well agencies cooperated and collaborated on WOPR. The Federal family consists of the management agencies, the BLM and FS, and the regulatory agencies, FWS, NMFS, and the EPA. In addition, numerous Oregon State agencies and many counties were involved in the development of WOPR and many had formal cooperating agency status. The Coquille Tribe had a seat on the steering committee. Many of these groups felt the Purpose and Need statement for the WOPR was narrow and overly constraining and developed without adequate collaborative involvement. Additionally, the deadline set by the settlement agreement for completion of the planning revision, December 31, 2008, prevented them from engaging in a more collaborative manner. For example, several State agencies stated that they were unable to adequately resolve issues, resulting in the letter of concern sent by Governor Ted Kulongoski (Appendix 7). The WOPR was viewed by many as disassociated from the NWFP, which reduced agency and public support of the effort. Although

extensive outreach and interagency coordination opportunities were offered, some cooperating agencies felt the outcome was predetermined and did not fully engage. (Page 21 of 63, *Western Oregon Task Force*)

Several cooperating agencies stated that, due to constraints of the Purpose and Need, they felt this would not be a truly collaborative effort. Consequently, this affected their commitment to the effort. Some expressed strong differences of opinion on the science and the assumptions used in modeling. The regulatory agencies stated consultation was difficult at the landscape level because plans do not provide the detail necessary to evaluate the effect of an action on a species. The question of whether consultation was required led to considerable debate among the Federal agencies. These events led to frustration, a feeling of not being heard, and again, that the decision was preordained. (Pages 21 - 22 of 63, *Western Oregon Task Force*)

Several Federal agencies expressed concern over their inability to thoroughly examine models, assumptions, and outcomes during the planning process. The schedule appeared to drive very tight timeframes that inhibited opportunity for full interagency discourse on those efforts, which lead to the disagreement and distrust. On the other hand, the WOPR steering committee clearly established a science team that was to provide advice, direction, and oversight on the underlying science and analysis; however, the science team did not include scientists from cooperating agencies. Because the science team did not have all requisite backgrounds necessary for the full range of analysis undertaken, team members contracted with outside scientists on certain modeling efforts. It appears that most modeling and analysis efforts either directly involved expert scientists, or relied upon their research. (Page 22 of 63, *Western Oregon Task Force*)

While the lack of up-front agreement and understanding of the underlying science and models used in the plan-level analysis created concerns with the regulatory agencies, this was of much greater concern for NMFS. This resulted in a basic distrust of the science and has translated into distrust at the project level when projects are proposed using this science. Largely due to the underlying statutes governing each agency's role in the consultation process, adoption of a "precautionary principle" has driven changes to project design. The precautionary principle is one in which, in light of inadequate information (or disagreement on the science), the most conservative approach is taken in developing final action design. The consultation process, unlike the NEPA process, does not employ an interdisciplinary team and projects can be modified by the action and consulting agency biologists to a point that raises issues about the scope of the existing NEPA analysis. (Page 22 of 63, *Western Oregon Task Force*)

Some people raised a concern that proposed critical habitat for the northern spotted owl did not align with the late successional reserve allocations in the NWFP. This comment was also made regarding the involvement of the BLM with the FWS in identifying critical habitat, and whether there was undue influence in this process. These people believed the regulatory agencies must operate independent of the land management agencies in developing critical habitat. A similar concern was raised that key watersheds did not align with the high intrinsic potential habitat for fish. (Page 22 of 63, *Western Oregon Task Force*)

Public Outreach and Involvement: The BLM had a massive and broad ranging public outreach effort during the development of WOPR. In addition to the involvement of cooperating agencies, the BLM maintained a mailing list of 1,600 individuals and organizations, held a total of 75 scoping meetings, and numerous key contact meetings during the 45-day formal scoping period. During the 5-month public comment period for the draft EIS (a minimum of 90 days is required), BLM held over 150 formal public meetings, open houses at District Offices, and meetings on request from organizations. The BLM used an innovative online web comment forum to both inform the public about the plan and to gather comments. The BLM received 3,000 comments during public scoping and 29,500 comments on the draft EIS. The agency also issued eight newsletters during the 29-month period from plan initiation until the draft EIS, detailing each step in the planning process. (Page 25 of 63, *Western Oregon Task Force*)

Even with this level of outreach, many people believe the public involvement was not effective or **collaborative**. Concerns were expressed that only those people with a keen interest in the outcome participated and the general public did not participate. Some people and organizations only participated to the extent required to maintain standing for future Court actions. People also indicated there was distrust in the planning process. They felt the plan was an attempt to increase harvest levels, decrease protection for species and water quality, and the decision was made at the start. The settlement agreement was often cited as a reason for this distrust. (emphasis added) (Page 25 of 63, *Western Oregon Task Force*)

In general, representatives of the wood products industry were complimentary of BLM's efforts to solicit public comments and the state-of-the-art online interactive public comment forum. Several noted that BLM went "above and beyond" the minimum requirements to solicit public input. In contrast, representatives from environmental organizations deemed the WOPR to be "dead on arrival" due to the settlement agreement which they felt dictated a plan revision with narrowly defined parameters. Although there were abundant opportunities for the public to participate, the environmental representatives stated these were not meaningful. Some stated the online interactive comment forum was established late in the process (i.e., when the draft plan was released); and, as a result, they felt it was an **ineffective collaborative tool**. (emphasis added) (Page 25 of 63, *Western Oregon Task Force*)

Members of Federal agencies, cooperators, and the public expressed a desire to have a **meaningful collaborative process**. Many think that any future effort must be **collaborative** in order to develop consensus around alternatives which will bring together the support of the majority of the public, stakeholders, and cooperating agencies. Many cited the efforts at the local level demonstrating **collaborative**, early engagement of the public as seen in the Siuslaw National Forest, the Oregon Watershed Enhancement Board watershed councils, and non-Governmental organization work in numerous areas of Oregon. The Roseburg BLM Office was cited for beginning a **local collaborative process** to develop forestry projects. Some suggested designing an outreach process that would "go to the stakeholder" first, rather than holding large public meetings to inform the public of a proposed project. (emphasis added) (Pages 25 - 26 of 63, *Western Oregon Task Force*)