

Board of Commissioners

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August 17, 2023

Bureau of Land Management Attn: Cascade-Siskiyou National Monument Planning 3040 Biddle Road Medford OR 97504 blm_csnm_rmp@blm.gov

RE: Comments on Scoping of the Bureau of Land Management Cascade-Siskiyou National Monument Resource Management Plan - DOI-BLM-ORWA-M040-2023-0002-RMP-EIS

Dear Bureau of Land Management:

We, the Jackson County Board of Commissioners, appreciate the opportunity to provide scoping comments on the proposed planning for the Cascade-Siskiyou National Monument (CSNM) Resource Management Plan (RMP). Our concerns are numerous and include, but are not limited to: impacts to transportation corridors, wildfires, impacts on private landowners, watersheds, planned areas of critical environmental concern (ACEC), and all of the Oregon and California Railroad Revested Lands (O&C Lands) located within the scope of the CSNM RMP.

We would like to provide our record and letter to use from the 2016 Jackson County public hearing regarding the expansion of the CSNM as a reference list of our citizens' concerns of impacts within the monument, and thus our concerns as a governing body, as comments on the development of scope changes within a new RMP. The record and letter from the 2016 public hearing, incorporated by reference into this letter, is available at https://jacksoncountyor.org/Whats-New/News/Latest-News/corrrespondence-and-public-hearing-documents.

With regard to transportation corridors and impacts on private landowners, access to private properties should remain open and available for landowners to have ingress and egress to their properties. Further, transportation corridors should remain open for public safety, including access to communication towers, response to wildfires, law enforcement, and search and rescue. Finally, public access, in general, to the public lands within the CSNM is an important and vital consideration in developing the CSNM RMP.

Wildfires are an ever-increasing threat to our community. The Federal government manages over 50 percent of the lands within Jackson County, including the lands within the designated area of the CSNM. The RMP must consider and address the management of the lands within the CSNM, as it relates to catastrophic wildfires, to include managing the vegetation to reduce the threats of and impacts from these wildfires. This must include the use of all methods including commercial harvest. The management of the lands currently has shown that the Bureau of Land Management (BLM) and the Federal government, in general, lack the resources to conduct management of these lands on their own without the use of commercial harvest. The CSNM RMP should consider and plan for the use of grazing, multiple use, forest management, and the possible consideration of prescribed fires when the conditions are correct and favorable. These management tools are necessary and important for the protection and conservation of a healthy ecosystem.

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We would ask that new nominations for ACEC's be put on hold until BLM evaluates the present Monument site for more exact management details and goals, and also discloses what actual science-based information or data gathering is being used to develop long range goals and objectives which meet the intent of the CSNM Proclamation(s). We request that the use of the "best available science" be closely scrutinized so that the wrongful direction of management goals within the Monument can be corrected and can more closely align with the needs of the citizens of Jackson County.

In regards to the O&C Lands court decision, we believe that until the dust settles in court, that there is not much to gain in planning for a new RMP, but acknowledging the management goals of the 1937 Oregon and California Revested Lands Sustained Yield Management Act (the O&C Act) on these lands should give guidance to the construction of reasonable details in the RMP on the designated O&C Lands. We believe that the CSNM RMP must include compliance with the requirements of the O&C Act including sustainable yield harvest.

Thank you for the opportunity to provide comments on the scoping for the CSNM RMP. We look forward to participating in the development of the RMP as this process continues.

Sincerely,

JACKSON COUNTY BOARD OF COMMISSIONERS

Colleen Roberts, Chair

Rick Dyer, Commissioner

Dave Dotterrer, Commissioner

:jb/mc

By: Mail and Email