Oregon
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July 10, 2014

TO: Land Conservation and Development Commission

FROM: Carrie MacLaren, Deputy Director

SUBJECT: **Agenda Item 13, July 24-25, 2014, LCDC Meeting**

STRATEGIC PLAN: STATUS UPDATE

I. AGENDA ITEM SUMMARY

This item is a progress report regarding development of the department's 2014-22 strategic plan. The department has received a number of responses to our request for comment. Department staff is in the process of compiling those comments for commission review; that compilation, together with any additional comments received, will be provided to the commission at the July meeting. No action by the commission is required, but staff will be seeking input and direction.

For additional information about this report, please contact Carrie MacLaren, Deputy Director, at 503-934-0051, or by email at carrie.maclaren@state.or.us.

II. ATTACHMENTS

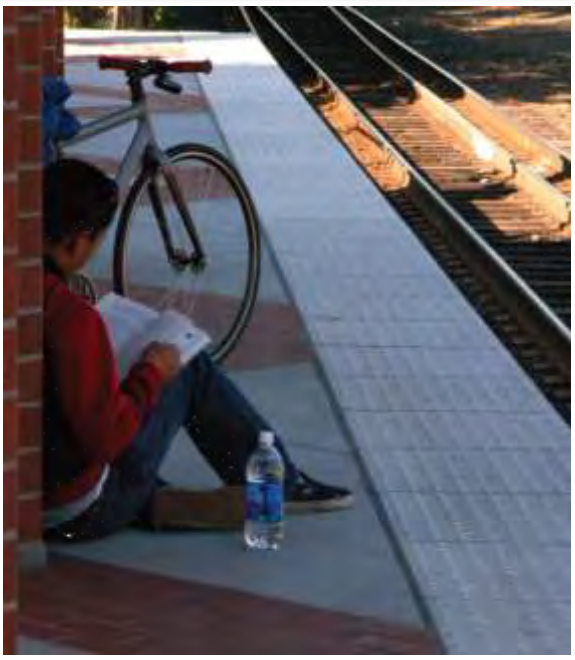
A. June 20, 2014 Public Comment Draft of the 2014-2022 Strategic Plan
B. Public Comments Received as of July 7, 2014
C. Link-Governor's 10-Year Plan http://www.oregon.gov/COO/Ten/Pages/index.aspx
D. Link-Department's Current Strategic Plan http://www.oregon.gov/LCD/Pages/about_us.aspx

Oregon Department of Land Conservation and Development

Item 13
Attachment A

Strategic Plan

2014-2022



Mission

As stewards of Oregon's visionary land use planning program, we foster sustainable, vibrant communities and protect our natural resources in a dynamic partnership with citizens and local governments. We help communities plan for, protect, and improve the cities, towns, and natural resources that provide a high quality of life.

Guiding Principles

- Ensure consistency with Governor's 10-year Plan(s);
- Provide a healthy environment;
- Sustain a prosperous economy;
- Ensure a desirable quality of life; and
- Provide fairness and equity to all Oregonians.

Strategic Goals to Guide Our Work

Who We Are

The Oregon Department of Land Conservation and Development (DLCD) is a small state agency. We work in partnership with local governments, and state and federal agencies. The Land Conservation and Development Commission (LCDC) provides the policy direction for the state land use planning program, and reviews certain major local land use decisions (other land use decisions are reviewed by a separate agency – the Land Use Board of Appeals). The department is organized into four divisions:

Ocean and Coastal Services – oversees Oregon's federally designated coastal program and, provides grants and delivers technical assistance to coastal communities at several regional offices.

Planning Services – provides technical expertise in transportation and growth management, natural hazards, climate change and property rights.

Community Services – reviews hundreds of local plan amendments each year for consistency with the statewide planning goals, provides grants to local governments, and delivers technical assistance from regional offices.

Administrative Services – the Director's Office and Administrative Services Division provide support for LCDC, policy development, and operations.

"The program's success is due to the working partnership between state and local governments and to citizen participation". – *Renew America (National Conservation Program)*

What We Do

We help carry out the vision and legacy of Senate Bill 100, which for 40 years has contributed to the quality and character of the natural and built environment of the entire state. Under the state land use planning program, every city and county, as well as Metro, is required to adopt and maintain a comprehensive plan and zoning code that is consistent with the statewide land use planning goals. Recognizing that each city and county has unique values and aspirations, our job is to provide planning guidance and technical assistance to help communities plan for their future.

The core functions of the program are management of urban growth, and conservation of farm, forest, coastal, and other natural resource lands, which are carried out through application of the 19 statewide planning goals in city and county comprehensive plans. Helping cities and counties address these functions in the context of a wide range of state and local interests requires that we be problem solvers. The department's mission reflects this active role for our department.

Local Governments

Oregon's land use program is designed to serve all Oregonians and support the work of the 242 cities, 36 counties, and one metropolitan service district (Metro) in the state. It does this by creating a framework that allows each city and county to engage its residents in planning for their future. The department's regional staff and program specialists provide technical and financial assistance to support local planning efforts. In addition, direct organizational links with cities and counties, such as the commission's Local Official's Advisory Committee, also support the state and local relationship.

Understanding this Document

This document is the strategic plan for the department for the period 2014-22. The focus of the plan is to identify new, targeted strategies that the department intends to implement over this eight-year period. Some strategies are admittedly aspirational. Others have not yet begun, and may not be realized without additional resources. Still other strategies are already underway.

The core (i.e., required and ongoing) work of the agency is referenced in this document, but not extensively described. That work is substantial, important, and implemented statewide. It reflects the core program elements that were initiated either with the creation of the department, the commission, and the 19 statewide planning goals, or through later additions and changes to the program. A better understanding of this core programmatic work can be found on the department website.

Strategies in this document are placed under one of the department's five strategic goals to make the link between the particular strategy and its purpose. Thus, for example, the strategies listed under Strategic Goal 3 show how we will go about engaging and informing people in the land use planning program. Some individual strategies, however, are not so easily categorized and in fact advance multiple strategic goals. In addition, there are some common themes that cross over several strategic goals. These include:

- Improve public communication and education capacity.
- Improve capacity to gather, analyze, and distribute data and information to local jurisdictions and other stakeholders, and to guide policy development.
- Increase community and economic development assistance to rural communities, in collaboration with the state's Regional Solutions Teams.
- Support state and local planning to respond to climate change, address natural hazards, and create resilient communities.
- Streamline urban growth boundary (UGB) processes, and increase the capacity at both the state and local level to focus on creating livable communities within UGBs.

Goal 1: Conserve Oregon's Natural Resources – Productive Farm and Forest Lands and Coastal, Scenic, Unique, and Other Natural Resource Lands are Planned and Managed to Provide a Healthy Environment, and Sustain Oregon's Communities and Economy

The protection of natural resources lies at the heart of Oregon's innovative land use planning program. Oregon's agricultural lands, forest lands, rangelands, beaches, waters and other natural resources are important economic, environmental and social assets for local communities and for the state. The quality of life made possible by a healthy environment, open spaces, and access to recreation continues to attract new people and business to Oregon. Core department work and strategies identified in this first strategic goal apply primarily to rural areas outside urban growth boundaries.

Conserve productive farm and forest lands

Core work: The department's planning specialists and regional staff provide planning and technical assistance to help communities address Statewide Land Use Planning Goals 3 (Agricultural Lands) and 4 (Forest Lands). Retaining parcels of sufficient size to support commercial farm and forest production is key, as is limiting uses that conflict with or otherwise impair farm and forest operations.

New Strategies

- Explore alternative (non-regulatory) methods that complement the existing land use program to ensure a sustainable land supply for Oregon's agricultural and forest industries.
- Improve the department's ability, in cooperation with the Oregon Department of Agriculture and the Oregon Department of Forestry, to evaluate and communicate the scale, nature, and location of farm and forest land conversion throughout the state.
- Analyze the impacts of ancillary and non-farm uses on agricultural uses to inform policy choices that seek to prevent or limit conflicting uses on those lands.

Protect and conserve coastal and marine resources

Core work: Provide policy, planning, technical, and grant assistance to local governments and state agencies to ensure compliance with statewide planning goals, including coastal goals, when coastal resources are involved in land use decisions. Administer Oregon's federally approved Coastal Zone Management Program, including federal grant administration, federal consistency review of federal permits and activities affecting the

coastal zone, and serving as the coastal and marine data coordinator, facilitator, and repository.

New Strategies

- Administer and amend the Territorial Sea Plan and coordinate the state-federal task force for marine renewable energy development, within the federal waters of the outer continental shelf.
- Update Oregon's estuary planning program.

Protect and conserve wildlife habitat, wetlands and riparian areas for their ecosystem values. Protect scenic, historic, cultural, and recreational values on rural lands

Core work: Provide planning and technical assistance to local governments concerning the implementation of Statewide Planning Goal 5 (Natural Resources). Technical assistance related to Statewide Planning Goal 6 (Air, Water and Land Resources Quality) assists in the prevention of ground water pollution. Additional technical assistance is provided to cities and counties to avoid or minimize the adverse effects of urban sprawl on rural resource lands.

New Strategies

- Guide development to less sensitive areas through better application of statewide planning goals relating to natural resources (Statewide Planning Goal 5) and natural hazards (Statewide Planning Goal 7) in local planning updates.
- Develop a "non-resource lands" policy that is integrated with resource lands protections strategies. [Note: "nonresource lands are those rural lands that are not suitable for farm or forest uses due to the physical properties of the land, e.g., poor quality soils.]

Goal 2: Promote Sustainable, Vibrant Communities

How communities are built and developed touches nearly every aspect of our lives: how we get to work or school; and where we live, work, and play. Planning for the full range of what makes a community livable – providing transportation and housing choices, strengthening economies, preserving open spaces and parkland, investing in improvements to public infrastructure, and protecting the environment – improves our quality of life.

Oregon continues to be successful in absorbing population growth while consuming less land than other states. This success reduces costs for public facilities, transportation and infrastructure, and protects productive farm and forest lands that contribute to rural economies. Community resilience, enabling communities to reduce exposure to natural hazards and respond to climate change, is receiving increased attention within the department. More recently, the Governor's 10-year plans for Jobs and Innovation, Healthy People and Healthy Environment, are influencing the department's priorities and communications with the public.

Urban and rural communities have complete and efficient comprehensive plans that include a sufficient supply of land, services, and infrastructure to meet a variety of economic opportunities

Core work: Provide planning, technical assistance, and grant funding to help local governments to keep local comprehensive plans, including planning for employment lands, up-to-date. Examples of core work include assistance with Transportation System Plans, inventories of buildable lands, and identification of housing needs. Department staff also review city and county comprehensive plan amendments to ensure compliance with statewide planning goals, statutes, and rules.

New Strategies

- Improve procedures and requirements for urban reserve planning outside the Metro region to improve utility and effectiveness (particularly for industrial lands), reduce adverse impacts on farm land, and increase public safety by avoiding areas subject to natural hazards.
- Work with local and state government partners to identify lands and redevelopment opportunities within existing UGBs that are closer to workforce housing or in existing industrial areas.
- Clarify administrative rules governing planning for employment lands in the Portland metropolitan area.
- Establish a new, simplified process to evaluate UGB capacity, guide amendments to UGBs, and increase efficiency in redevelopment and infill.

Land use and transportation planning are linked to provide for the development of well-functioning, well designed, and healthy communities

Core work: Provide planning and technical assistance to local governments to support community efforts to expand transportation choices for people. In partnership with the Department of Transportation, administer the Transportation and Growth Management Program, which works with local governments to link land use and transportation planning to create vibrant, livable places in which people can walk, bike, take transit or drive where they want to go. Housing affordability and housing choices are an important component of the link between transportation and land use planning.

New Strategies

- Complete scenario planning to meet greenhouse gas reduction targets adopted by the commission.
- Increase access and availability to well-connected transit, bicycle, and pedestrian networks.
- Develop more effective housing affordability and housing choices strategies.
- Together with the Department of Transportation, re-evaluate the Transportation and Growth Management Program as a funding tool to achieve integration on local projects.

Community development activities will be enhanced to support local efforts to revitalize communities, seek public infrastructure solutions, and build community participation

Core work: Planning and technical assistance for community development is currently provided on a limited basis, and upon request by local communities. Increasing capacity in this area is anticipated through participation in the Regional Solutions Teams.

New Strategies

- Improve the ability of communities to carry out plans to develop well-functioning, well-designed, healthy communities.
- Help revitalize rural communities through integrated planning for transportation, land use, housing, workforce development, and infrastructure, in coordination with Regional Solutions Teams.
- In coordination with Regional Solutions Teams, align land use, transportation, and other infrastructure planning so that investment of state resources reflects state and local priorities and assures the value of those investments over time.

Urban and rural communities will plan for and develop resilience to natural hazards, including those exacerbated by climate change

Core work: Provide planning and technical assistance to help communities plan for and address flooding and other hazard events with mapping and data, particularly in coastal areas.

New Strategies

- Support local government planning for resilience, specifically targeting natural hazard and climate change mitigation.
- Create a joint natural hazard resilience program and public interface with the Office of Emergency Management and the Department of Geology and Mineral Industries.
- Assume responsibility for regular updates to the Oregon Natural Hazard Mitigation Plan.

Goal 3: Engage the Public and Stakeholders in Oregon's Land Use Planning Program

As shown in periodic statewide surveys, Oregonians greatly value the contribution land use makes to what they value about living in Oregon. On average, two-thirds of Oregonians feel strongly about protecting existing farmland and forests from development and urban sprawl, and believe that development should be directed to cities and towns; a majority of Oregonians support more investment in public transit; a large majority of Oregonians value the state's natural beauty, outdoor recreation opportunities, and relatively clean air and water. In contrast, respondents also believe that the department should help the public more clearly understand how those outcomes are achieved, and more robustly engage the public in a better understanding of the land use planning program.

In addition, given the department's lack of a dedicated communications officer, communications and information to the public tends to be reactive, in response to inquiries and often following high-profile, controversial projects. To address this, an ongoing information and education program should be established.

Recognizing the importance of the department's existing collaborative relationships, the plan also calls for strengthening these relationships with other state agencies, local and tribal governments, colleges and universities, and individuals, organizations, and private businesses by improving coordination and planning for land use, housing, infrastructure, and transportation.

Therefore, this strategic goal contains two related, but distinct aspects: (1) communicating to and informing the public; and (2) engaging and collaborating with other entities throughout the state.

Develop strong collaborative partnerships with citizens and communities in all regions of the state through citizen involvement, outreach, and collaboration

Core work: The department addresses this objective in an ongoing manner through support for the Citizens Involvement Advisory Committee, the Local Official Advisory Committee and staff involvement with communities – planning staff, residents, and elected officials – on a daily basis.

New Strategies

- Increase participation of a wider range of stakeholders in local and state decision-making across the state.

- Obtain improved public engagement tools for use by the department and local jurisdictions.

Improve communication and education with citizens and stakeholders in all regions of the state

Core work: The department engages and informs the public and stakeholders through maintenance of its website, publications and public speaking.

New Strategies

- Develop a communications program that raises awareness and understanding of the operation, benefits, and tradeoffs of the statewide land use planning program, and assists the department in the development of policies and programs.
- Improve the department's website for clarity, utility, and increased public use.

Goal 4: Provide Timely and Dynamic Leadership to Support Local and Regional Problem Solving

The department is a small agency with a big mission. The mission includes stewardship of the state's land use planning program and the 19 statewide planning goals that encompass it, as well as support for the 279 local jurisdictions that implement the program on the ground. Many land use issues emerge that cut across state agencies, differently impact regions of the state, or implicate conflicting state and local policies. Therefore, as used here, the term "leadership" means selectively and strategically choosing a set of these cross-cutting issues for which the department will invest significant time and energy.

Ensure short-and long-range policy development for the commission and department

Core work: The director's office supports and informs policy development connected with the legislature, the Governor's office, and the Land Conservation and Development Commission.

New Strategies

- Improve the department's review and report of progress toward meeting policy objectives and requirements of the land use program.

Improve capacity of local governments to carry out their land use responsibilities

Core work: Planning, technical assistance, and limited grant assistance are provided to local governments.

New Strategies

- In coordination with the Governor's office and state agencies, help local governments assess, plan, and build needed public infrastructure, including public facilities and school siting.
- Provide local governments with data and information to help complete comprehensive planning.
- Develop new processes and resources for keeping local plans up-to-date.
- Seek an increase in grant funding for local governments.

Develop and coordinate strategic initiatives with other state agencies, tribal and local governments

Core work: Big-picture initiatives are developed and supported with key stakeholders, including state agencies, local and tribal governments, and a wide range of advocacy

organizations such as those oriented to environmental protection, housing and community development, commercial natural resource interests, energy development, and parks and recreational interests.

New Strategies

- Engage state agencies, in coordination with the Governor's office to implement provisions of the 2010 Climate Change Adaption Framework.
- Update state agency working relationships, rules, and state agency agreements.
- Ensure that the policies and values of the statewide land use program are reflected in the process and outcomes of Regional Solutions Teams.

Seek solutions that address immediate and long range challenges, in collaboration with key stakeholders and others

Core work: The department cooperates with organizations such as colleges, universities and research institutions to provide research and analysis for identified projects.

New Strategies

- Provide coordinated population forecasting for all cities and counties through Portland State University's Population Research Center.
- Continue development of a land use portal in collaboration with Oregon State University's Institute for Natural Resources.

Manage and improve information services within the department and for use by a wide array of stakeholders

Core work: The department's capacity to generate mapping, GIS, and scientific information for use in local decision making is incrementally improving. This capacity is increasingly important for jurisdictions where planning resources have been greatly reduced in recent years.

New Strategies

- Improve the department's ability to collect, store and analyze geo-spatial and scientific data and information.
- Improve the distribution and availability of geo-spatial data and scientific information to local governments and the public, emphasizing web-based methods.

Goal 5: Deliver Services that are Efficient, Outcome-Based, and Professional

The department works to continually deliver pertinent, timely information to our partners, and to provide staff with the tools and training they need to provide excellent customer service. Both external and internal processes are monitored and adjusted to meet this goal. This goal is primarily a function of administrative and human services within the department.

Operate a professional organization that is efficient, operates according to best practices, and seeks to continually improve operations

Core work: Provide budget development and execution; personnel management, development, and evaluation; and grant and contract administration.

New Strategies

- Increase opportunities, awareness, and utility of those opportunities for professional staff development and training.
- Improve institutional memory and efficiency through better succession training.

Manage and provide services to local governments to support department and local objectives

Core work: Deliver technical assistance and administer grant funding to local governments in a timely and professional manner.

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Item 13
Attachment B

July 3, 2014

Land Conservation and
Development Commission
635 Capitol Street NE, Suite150
Salem, OR 97301

ATTN: Amie Abbott

Re: Draft 2014-22 DLCD Strategic Plan

1000 Friends of Oregon appreciates the opportunity to provide comments on the draft DLCD 2014-22 Strategic Plan. We made extensive comments on the department's first draft of this effort, and we commend the department for being responsive to our comments, and those of others, by taking a completely fresh approach to its Strategic Plan.

A significant improvement is the Plan's organization around five strategic goals, rather than around bureaucratic silos. Not only does this make the document far more readable, but hopefully this will also be reflected in the substantive day-to-day work of the agency staff, both internally and in increased collaboration with other state agencies.

Our comments are provided in the order in which the topic appears in the Plan, categorized under each Plan section, and with page numbers noted. But our first comment is overriding: please change the five "goals" to any other term – objectives, benchmarks, targets, etc…. The word "goal" is a term of art in land use, and its use here is confusing.

I. Who We Are

(Page 2)

- The citizens of Oregon should be included among those with whom the department works and serves, in addition to the listed government entities.
- We recommend changing the term "growth management," as it is not really accurate. The land use program applies to, and the department serves, all communities, large and small, whether they are growing or not. "Management" is a sterile, not very descriptive term. Rather, a better description would be something like: "the department provides technical expertise to communities on how to create and maintain walkable neighborhoods with a mix of uses, housing and transportation choices, efficient infrastructure, and access to nature." Or, the department could use language found later in this Strategic Plan to "promote sustainable, vibrant communities."

(Page 3)

- Modify the 2nd sentence under *Local Governments* as follows: "It does this by creating a framework that ~~allows~~ **insures** each city and county to engage its residents in planning for their future." The draft is an insufficient description of Goal 1's requirements. Goal 1 every local government to adopt a "citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process."
- We support the "common themes" that cross all of the "strategic goals." However, a few should be strengthened, as follows:

    - We agree that improving the department's public communication and education capacity is long overdue and will support the department in increasing its budget for this purpose. We recommend that the Plan specifically commit the department to engaging in these activities with communities and populations that are generally not heard from in the land use processes, including communities of color, the elderly and the young, those of modest economic means, and those who are dependent on transit, walking, or bicycling.
    - The theme to merely "support" state and local planning to "respond' to climate change is much too weak. Climate change could and should be a defining framework for this entire Strategic Plan. The draft language is also inconsistent with the key role that land use and transportation planning play in achieving the state's legislatively-adopted greenhouse gas (GHG) reduction goal; it is inconsistent with reaching the targets that LCDC set for the major urban areas of the state to reduce GHG from the transportation sector; and it is inconsistent with the state's Global Warming Commission's *Roadmap to 2020*. The word "Support" should be changed to "**Lead**."
    - Add a theme that commits the department to working with other state agencies – such as the Oregon Health Authority and the Housing Agency – to capitalize on their expertise to achieve the land use planning goals.

II. Goal1: Conserve Natural Resources

The policy language and the recommendations under Goal 1 of the strategic plan are generally excellent and we support the Department's intent to protect important resource lands for future generations. Below we quote a few specific sections, followed by our comments. However, given that agriculture is Oregon's #2 industry and one that has increased in value for over two decades; the growing global importance of protecting Oregon's farm lands to feed Oregonians and beyond; the increasing demand for more farm land; and the influx of interest in farming by new and younger farmers, the description of the department's work should be beyond merely "retaining parcels of sufficient size, …." We recommend adding a description of the pivotal role the land use program and the department should play in supporting and growing a robust *agricultural industry*.

(Page 4)

"Explore alternative (non-regulatory) methods that complement the existing land use program to ensure a sustainable land supply for Oregon's agricultural and forest industries."

- We assume this refers to the concept of transfer of development rights (TDRs). We have some reservations about how this concept would be used; however, since this language is only about *exploring* TDRs, we can accept it with some further explanation. We recommend adding: "This could include using market-based solutions like TDRs and conservation easements. However, these mechanisms are more difficult to apply in Oregon because our land use program has done a good job of protecting resource lands and encouraging density in cities."

"Analyze the impacts of ancillary and non-farm uses on agricultural uses to inform policy choices that seek to prevent or limit conflicting uses on those lands."

- This is an extremely important initiative and we look forward to participating.

(Page 5)

"Guide development to less sensitive areas through better application of statewide planning goals relating to natural resources (Statewide Planning Goal 5) and natural hazards (Statewide Planning Goal 7) in local planning updates."

- 1000 Friends recognizes the importance of re-invigorating Goal 5 and breathing life into the currently unimplemented Goal 7. We applaud the Department's commitment to these ends and eagerly anticipate participating in these initiatives.
- Add to this strategy that the department will integrated the agency's Goal 5 and Goal 7 efforts with the state's climate adaptation planning.

"Develop a "non-resource lands" policy that is integrated with resource lands protections strategies. [Note: "nonresource lands are those rural lands that are not suitable for farm or forest uses due to the physical properties of the land, e.g., poor quality soils.]"

- We support development and implementation of a non-resource lands policy, assuming this does not include the designation of new non-resource lands that are currently being used as or could be used as resource lands.
- Again, this strategy should state that it will be integrated into and consistent with the state's climate adaptation strategies. For example, this could include limiting development in fire-prone areas, even if they are "non-resource" lands.

III. Goal 2: Promote Sustainable, Vibrant Communities

(Page 6)

"This success reduces costs for public facilities, transportation, and infrastructure, and protects productive farm and forest lands that contribute to rural economies."

- We support this statement, but other benefits of promoting sustainable, vibrant communities should be listed, including improved public health through active transportation and reduction in air pollution; reduced costs to households due to savings from the decreased need to drive; and increased housing choice.

"Community resilience enabling communities to reduce exposure to natural hazards and respond to climate change is receiving increased attention within the department."

- Communities must do much more than "respond" to climate change, and the department should be *leading* the way in demonstrating and requiring steps to get ahead of the current climate trajectory by reducing GHG emissions from the land use and transportation sectors. That it is merely "receiving increased attention" from the department sounds like the department is a Johnny-Come-Lately to the realization of the significance of global warming.

"Urban and rural communities have complete and efficient comprehensive plans that include a sufficient supply of land, services, and infrastructure to meet a variety of economic opportunities."

- Change the word "land" to "capacity," to be consistent with HB 2254 and the department's other aspirations on efficient infrastructure. Capacity includes land, but is not only land. To achieve economic efficiency of infrastructure and public spending and to respond to changing demographics and demands for more compact communities requires getting more out of the land and buildings we already have in our urban areas.

"Improve procedures and requirements for urban reserve planning outside the Metro region to improve utility and effectiveness (particularly for industrial lands), reduce impact on farm land …."

- 1000 Friends does not support this strategy. There is **no factual basis** for the assumptions underlying this strategy, and thus no basis for the department to expend what would be a significant amount of time of staff and others to do this. Too often the department pursues a "solution" without a definition or understanding of the "problem," and the result is unintended consequences and wasted time.

  Thus far, the implementation of urban reserves throughout the state has *done nothing* to either reduce the impacts of urbanization on farm land, or to improve industrial land utility. It has lead only to locating urban reserves *on* farm land; to neglecting industrial lands already inside UGBs; to allowing conversion of excellent industrial lands inside

UGBs to other uses; to neglecting serious policy attention and financial investments to bring industrial land inside UGBs to readiness; and its has caused wasteful expenditures of public monies on infrastructure provision to unneeded areas. Until the department demonstrates serious and sustained efforts on the *existing* supply of industrial lands in our cities and rural communities, spending time on urban reserves is a massive distraction. Just this week a 1000 Friends staff member was meeting with a major, long time industrial land developer in Oregon who remarked on how frustrated he has been with the dismal job the state has done to prevent conversion of existing and good industrial lands inside UGBs to non-industrial uses. When DLCD and other state agencies watch passively while sites like a 90-acre industrial parcel inside the McMinnville UGB, on Highway 18, is considered for conversion to a shopping center, the state should not be spending its time promoting designation of urban reserves.

(Page 7)

"Complete scenario planning to meet greenhouse gas reduction target adopted by the commission."

- 1000 Friends supports this strategy but would like the Plan to define "complete." Currently, only Metro is required to both complete and implement a chosen scenario to reduce GHG emissions from transportation sector by integrating land use and transportation planning. The Central Lane MPO is required to complete, but not to implement, a land use and transportation scenario to reduce GHG emissions. 1000 Friends supports every metropolitan planning organization (MPO) area, of which there are now six in the state, being funded to conduct and implement scenario planning, with support from DLCD, ODOT, and other appropriate state agencies.

IV. Goal 3: Engage the Public and Stakeholders in Oregon's Land Use Planning Program

(Page 9)

We support the department's efforts to fund a strong education and communications program. As described earlier, this description should include specific engagement with communities not normally brought into their community's and state's land use planning discussions. The word "stakeholders," even modified by "wider -range" still sounds like a closed set. All Oregonians are "stakeholders."

V. Goal 4: Provide Timely and Dynamic Leadership to Support Local and Regional Problem Solving

(Page 11)

We commend the recognition that land use issues "cut across state agencies"; we encourage the department to engage more state agencies in providing community solutions, including, as mentioned, those that deal with housing and public health.

"In coordination with the Governor's office and state agencies, help local governments assess, plan, and build needed public infrastructure, including public facilities and housing."

- We recommend that the Department take the lead in establishing guidelines for local governments to make a fiscal impact analysis of the life cycle costs – not just capital costs, but also operation, replacement, and repair – of infrastructure for UGB expansions and major land development. The un-accounted for, but predictable, costs of operating and maintaining infrastructure is placing a severe economic strain on local governments and their ability to provide all community services. Prior to making major land use decisions, local governments and the public should understand the financial benefits and burdens of the proposal.

(Page 12)

We support the department's commitment to engage with state agencies to implement the 2010 Climate Change Adaptation Plan. We would like to see this, as well as the Global Warming Commission's *Roadmap to 2020*, the state's GHG reduction targets, and LCDC's GHG reduction targets for MPOs, be more prominent in this Strategic Plan.

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July 2, 2014

Land Conservation and Development Commission
635 Capitol Street NE, Suite 150
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Re: Comments from the City of Bend on the Department of Land Conservation and Development's Proposed 2014-2022 Strategic Plan

Members of the Commission:

The City of Bend appreciates the opportunity to comment on the Department's 2014-2022 Strategic Plan. Thank you for the opportunity to comment. The City recognizes we're a partner in carrying out the statewide planning program and in that spirit provides the following comments on the draft strategic plan.

1. Mission (Page 1). The City strongly encourages the Department continue to improve the ways to works with local governments to ensure that the partnership is both dynamic and effective.

2. Theme – "Improve capacity to gather, analyze, and distribute data and information to local jurisdictions and other stakeholders, and to guide policy development." (Page 3) The City strongly supports this direction and theme and encourages the Department to continue its efforts in this area.

3. Goal 2: Promote Sustainable, Vibrant Communities (Page 6). This goal recognizes that Oregon continues to be successful in absorbing population growth while consuming less land than many other states. While the City supports this Goal, we also recommend that the Department not lose sight of the fact that this efficiency is intended to accomplish multiple purposes, including, but not limited to, ensure needed housing and adequate economic opportunities within urban growth boundaries. We need adequate supplies of different land types within UGBs to ensure that our community members have access to residential and economic opportunities.

4. Goal 3: Engage the Public and Stakeholders in Oregon's Land Use Planning Program (Page 9). We strongly support the Department's continued efforts to not only increase participation, but also better communicate the

program's benefits at the state and local level. In particular, we recommend the Commission and the Department look at ways through which they can continue to communicate and educate about the program and how it guides the decisions we make at the local level. There are many people in our community who are unaware of the robust Land Use Planning Program. Seemingly simple actions on the City's part to comply with state law are sometimes misunderstood by community members making the implementation of the program more challenging than it needs to be.

5. Goal 4: Provide Timely and Dynamic Leadership to Support Local and Regional Problem Solving (Page 11). Regarding this goal, the City strongly supports the Department seeking an increase in grant funding for local governments to address local and regional challenges. Please consider us when seeking parties to testify in support of increased grant funding in the Department's budget and how grant funded projects have helped the City of Bend address these types of issues.

Thank you again for the opportunity to comment. Please let us know if you have any questions.

Sincerely,

Jon Skidmore
Assistant City Manager

JS/dps

cc: Bend City Council
Erik King, City Manager
Nick Arnis, Growth Management Department Director.

Ms. Abbott,

Thanks for the opportunity to comment. I have the following comments/concerns/questions:

1. Page 6 – I'm excited to hear that assistance may be available to update Buildable Land Inventories. We may be starting that process soon.
2. Page 6 – A goal to simply increase efficiency in redevelopment and infill would not go over well in Corvallis these days. We understand the need for density, but I think the community is looking to balance density goals with a desire to maintain livability. A focus on enhancing the compatibility of infill development, and support for such efforts, would be much appreciated.
3. Page 7 – What is meant by "investment of state resources should reflect state and local priorities"? It seems like that could be interpreted a lot of different ways.
4. Page 10 – Given the importance of Goal 1, there might be an opportunity here for DLCD to pioneer methods/software/best practices for on-line public engagement.
5. Page 12 – What is the "land use portal" under development at OSU and what will it be used for?

Thanks,

Kevin Young, Planning Manager
City of Corvallis

Dear Amie,

As a lifelong Oregonian and member of 1000 friends, I would like to offer a few thoughts regarding what I believe to be a superb land use system.
With deep regret I am watching the small farms on the edge --throughout the United States but also here in Oregon-- disappear, without thought for the needs of future generations and the advantages of "fresh, local" foods that might have served local schools and markets without a heavy carbon
footprint.

I am looking at the 1000+ acres of proven farmland in the EFU of the Stafford Hamlet for instance, where people who have lived here all their lives would rather support small organic farms as a working landscape buffer between the three surrounding cities than pave over the land with condominiums and apartments. We have mineral rich soils which support now an estate winery, two century farms, and a tremendous variety of fruits, nuts, vegetables, and forestland.This is a pocket of agricultural land with "excellent capability", and although Metro tells us that "we can continue to farm" within the UGB, you know and I know that there are incentives pushing against this.

How can we incentivize saving these pockets of prime farm lands (the ones that actually produce the food we eat every day) that might be protected in contiguous blocks for the good of all the region -- this agri*culture*-- in addition to the ongoing agri*business* of wheat and lumber that operates beyond the cityscape? Could we establish a trust that permits Transferable Development Credits, transferable to willing EFU landowners that are part of Urban Reserve(rather than 10 miles beyond the city borders as our laws now specify)? This could provide food security (as they call it in England) and a welcome breathing space amidst the density.

This is an important refinement of the land use laws whose time has come. These precious soils do not exist except in a few places on our Earth.
We must devise a way to protect the very character and the green goals of our state.

Molly Ellis
Planning Chair and

Board member for the Stafford Hamlet

Please pass these thoughts on to the committee and advise me of the time when I might come and participate in the hearings… Thank you.

Natural Selection Alternative©

For the Medford District BLM

South Deer Landscape Management Project

Submitted by

Deer Creek Valley Natural Resource Conservation Association
P.O. Box 670
Selma, Oregon 97538

(File:NSA DCV 5-26-05 msw g.doc) — *(ms-word version*:)

South Deer Landscape Management Project
Natural Selection Alternative

Submitted by
Deer Creek Valley Natural Resource Conservation Association
P.O. Box 670
Selma, Oregon 97538

This alternative was prepared by the Deer Creek Valley Natural Resources Conservation Association (DCV) in collaboration with BLM, South Deer Forest Committee, Selma community and the larger community. It is based on 14-Criteria for Sustainability(see Appendix Pg.9), supported and endorsed by hundreds of individuals, community leaders and organizations.

DCV appointed a core team including the following individuals and focus: Mary Camp, team coordinator; Orville Camp, author of the Natural Selection Alternative; Lynne Campbell, research site specific data; and Pamela Tennity, community outreach. Andrea King provided editing. Numerous others from DCV and the general public have contributed to this project.

 Premises and *Criteria for Sustainability*, were developed for the purpose of evaluating proposed forest practices before action is taken. Natural-selection-based concepts were first implemented at Camp Forest by Orville Camp in 1967. These concepts have since, been implemented by many people in several countries.

Exhibits:

1. Map of West South Deer OI Units
2. Map of East South Deer OI Units
3. OI Unit Table
4. Map of West Lake Selmac Trail
5. Map of Thompson Creek Overlook Trail System
6. Historical 1855 Map of Aulthouse Pack Trail
7. Dennis Odion, Fire Ecologist, Letter of Support

CONTENTS

Ecosystem-centered Purpose and Need

The purpose and need of the *Natural Selection Alternative* is to provide a variety of commodities and uses while allowing nature to retain and restore species, habitats, functions, and forest ecosystem health across the landscape.

Philosophy and Vision of Natural-Selection-Based Practices and Natural Selection Alternative Resource Objectives and Actions

The *Natural Selection Alternative* recognizes that natural forests contain biological, ecological, economic, recreational, aesthetic, historical and spiritual values. It will sustain these values.

Natural-Selection-Based perspectives recognize 1) that other species create forests, 2) that many forest lands, especially non-entered late-succession forests, should be preserved as they are, 3) the need for natural recovery of forests damaged by human management, 4) that human needs require the extraction of resources from some forest lands, and 5) the total forest ecosystem must remain intact, with human activities in harmony with nature.

Best traits, resource extraction, productivity, connectivity and restoration
Species sustainability relies on reproduction of best survival traits. Naturally evolved environments allow species to adapt to them. The natural-selection-based approach retains best traits for all species.

Green plants sustain life on Earth. Green plants with best traits sustain their species. Under the natural-selection-based approach, organisms with best traits (stronger dominants) are retained. Only the dying ("weaker members") or dead, are removed to serve human needs. The dead and dying (including snags and woody material of the forest floor) sustain the living. To extract sustainedly (both green and dead), humans must share these resources with all naturally evolved species. The more trees extracted the less snags and woody material will be left to serve other species needs. The Natural Selection Alternative will extract resources at sustainable levels. (1)

Sustainable extraction levels require stewards with fundamental understanding of how ecosystems function, and how resource extraction will affect each of the "eight essentials": Climate, soil, water, air, food, shelter, habitat, and reproduction necessities that determine which species can survive. When there is uncertainty about resource extraction, those in question will be left until doubts are resolved. The Natural Selection Alternative will offer high skill forest work to qualified stewards that adhere to natural-selection-based criteria for sustainability.

The Natural Selection Alternative will meet or exceed the Medford District Resource Management Plan objectives and actions/directions requirement for down wood, snags, and riparian reserves (p. 26-28) including ACS objectives (p. 22), and for Matrix lands (p. 38-40) .

The Natural Selection Alternative will retain all naturally evolved successional habitats across the landscape including riparian reserves. A no-treatment area of 50 feet adjacent to perennial streams and 25 feet adjacent to intermittent non-fish bearing streams and springs, will be maintained. There will be no treatment within the full riparian reserve where there is a domestic

water source.

Since no trees are removed before they have been naturally selected, the volume of removal is restricted to what the forest is naturally able to produce. Retaining forest structure and functions at all times means no forest "down time" so the forest is always in full productivity.(2,3) No down time, means no restoration costs. Forest resource volume is expected to increase over time.(4)

Every part of the forested landscape including meadows, aquatic, and riparian areas, will remain or become a corridor for evolved species. The Natural Selection Alternative leaves habitats intact so early and late successional ecosystems can evolve to their natural conclusions.

In natural-selection-based practices, the term 'restoration,' or 'recovery', means to restore original late successional communities to their original species and ecological functions.

The Natural Selection Alternative will retain the few remaining small islands of natural late successional and legacy forests in South Deer to 1) sustain late successional species, 2) provide wildlife reservoirs for restoring early successional plantations that currently encompass much of the South Deer Project area, 3) moderate climate locally, regionally and globally, 4) store and filter high quality water, 5) provide wildlife corridors across the landscape, 6) understand the meaning of forest recovery by showing what they look like and how they function, and 7) serve human visual, spiritual, educational, natural history, recreation and tourism needs.(5,6)

Resource extraction will occur in early successional forests where past extraction has occurred and be such that young forests will be allowed to evolve to late successional community conditions. Legacy, and structurally intact late successional forests, will not have resource extraction. (See map-Exhibits 1 and 2; OI Unit Table: Exhibit 8)

The Natural Selection Alternative will address climate change issues through optimal green plant and carbon storage, and reducing fire risk without burning.(7)

Fire and the Wildland Urban Interface
A higher level of resource extraction will be used in areas of South Deer that have dwellings within the home-ignition zone (approximately 100 feet beyond the dwelling).(8)

"Treating the home-ignition zone . . . can almost eliminate the possibility of homes burning in wildfires."(9)

Natural fire frequency and severity
Historic studies of fire in the region show a wide range in fire intervals.(10) Late successional forests in South Deer represent a historical fire variable and will be retained in their natural state (natural fire will occur).

The Natural Selection Alternative will allow (if scientifically supported) natural fire in some areas where fire has been absent long enough to allow low fire severity.

Increased early successional tree plantations in the Deer Creek watershed have resulted in increased forest fire hazards and risks. The Natural Selection Alternative will restore and retain low fire hazard conditions by retaining stronger dominant trees and closed canopies.(11) Lower fire hazard conditions will return as canopies close and trees grow taller, ground fires are less likely to reach the canopy and as understory is reduced or disappears.

Prescribed fire, forest floor woody material, and slash
Natural Selection Alternative will not use prescribed fire unless it can be shown that an evolved species is in danger of extinction because of lack of fire. Since prescribed burning will not be used, the Natural Selection Alternative will retain natural levels of woody material on the forest floor necessary for retaining forest biological and ecological health and productivity. With the Natural Selection Alternative there is little slash and that is lopped and scattered.(12,13,14,15,16,17,18,19)

Non-native plants
The Natural Selection Alternative will retain environments best suiting native species, preempting invasions of non-native species through: 1) canopy coverage that will retain climate, soil and water conditions not favorable to non-native species (one-lane roads will help retain or achieve canopy coverage), 2) minimal soil disturbance (through use of rubber-tired resource extraction equipment on roads and restriction of off-road heavy equipment), and 3) minimal fire.

Stewards will prevent invasions of non-native species and eliminated them, when necessary, through; 1) physical removal, 2) manual application of least toxic effective chemicals, and 3) weed prevention protocols and eradication, in accordance with Medford District Integrated Weed Management Plan and programmatic EIS, that comply with BLM and NSA objectives of retaining forest health.. (20)

Visual, spiritual, recreational, educational, historical and tourism
Highway 199 is the premiere recreation and nature-education development opportunity for Oregon's costal mountains. South Deer is with this visual corridor and there is easy access from 199 past Lake Selmac through South Deer to the Oregon Caves. The Natural Selection Alternative will retain visual values and an environment in which the untrained eye will be unaware of ongoing forest product removal. It will develop aesthetically pleasing, hiker-friendly trail and road systems, creating opportunities for recreation, nature-based education, and tourism.

The Thompson Creek Overlook Trail System has a long history of being used for visual, spiritual, recreational, educational and hiking values. Further development of this trail system will provide low elevation easily accessible recreational opportunities to meet the growing demand for recreation on public land. A 1.5' to 2' wide trail system, with grades of generally 10% or less, will serve both short and long hiking needs for all ages. The trail system will be built or upgraded by hand or with mechanical equipment (e.g., chainsaws, trail building machines). The upgraded trail system will have 6 miles of various looping hiking options through a variety of ecosystems including late successional legacy forests and rock outcroppings with spectacular panoramic views of South Deer, Grants Pass, Oregon Coast Range and California mountains. (See Map Exhibit 4 for layout) If access can be acquired, the trail is proposed to continue to Kerby Peak.

See Appendix: South Deer *"Significant Features"*
See Appendix: *"The Natural Selection Alternative Promises to be a Beneficial Alternative for the Tourism Economy in the Highway 199 Travel Corridor" by Roger Brandt.*
See trail maps: Exhibits 3,4 and 5.

Trail or road?
The main difference between trails (for hiking) and roads (for vehicles) is width, but basic design principles apply to both. It is proposed that this contour-loop-access-system be used to develop future trails around Lake Selmac in T 38-7-Sections 13, 18 and 19.

Roads can serve human needs while retaining healthy forests
The concentric-contour-loop-access-system will be located and designed to retain biological and ecological integrity across the landscape, retain upper canopy structure connectivity where possible, allow economically efficient removal of products, and adhere to high visual standards.

The contour-access-road-system will be designed to contour the land perpendicular to natural water flows to minimize water diversion and erosion. Late successional forests will not have products removed from them so will have roads only when necessary to connect to areas beyond them. Extremely steep slopes, unstable soils, swamps, alongside streams, and special habitats, will be avoided.

Access economics
The contour-access-road-system will be designed for perpetual use and economical access to a variety of resources. The system will aid in inventory and extraction of products for special markets. It will allow use of smaller equipment with less economic and environmental impact. Its low-cost design, construction, and maintenance will permit upgrading without major costs of road relocation.

Fire access
The Natural Selection Alternative looping-contour-access-road-system will serve as effective firebreaks and provide alternate entrance and escape routes.

Contour-access-systems design
Overall road density, with the contour-access-road system, will be less than current skid, temporary, and permanent road density.

Existing roads will be analyzed for low ecosystem impact and for efficient use and removal of forest resources. They will be used where appropriate. All skid roads will be eliminated. Natural decommissioning will be used where new growth will naturally recover biological and visual values, active decommissioning will be used where natural recovery is unlikely.

Road 38-7-27.1 has design problems that cannot be corrected. It has a history of polluting domestic water. Road caused stream diversions will be restored to their natural channels. This road will be allowed to naturally decommission to a narrow foot trail. This road has been used as a trail and will be integrated into the Thompson Creek Overlook Trail System. Road 38-7-

27.2, also part of the Thompson Creek Overlook Trail System, will be naturally decommissioned to a ten food wide trail that will allow limited recreational vehicle uses related to trail uses. This road will be extended (possibly a few hundred feet) to allow a recreational vehicle turnaround to be developed. (See Thompson Creek Overlook Trail System Exhibit 4)

New concentric-contour-looped-access-roads will be predominantly ten feet wide with curve widening. Roads will parallel each other at 300 to 600 feet, and will retain grades of three to ten percent where practicable. Existing dead-end roads will be converted into loop roads where practicable. (See Road Maps Exhibits 6 & &)

Doublewide roads will be reduced to ten-feet width to enable reconnecting of the canopy for wildlife corridors and to reduce erosion. Where practicable, road width will be allowed to naturally decommission to 10-foot wide surfaces on the outer edge to enable canopy closure and to reduce erosion. Roads with existing reciprocal agreements will be negotiated with party holders on a case-by-case basis.

Access and vehicles
Resources not hand carried will be lined to the road. Rubber tired equipment will be used for resource extraction and will be kept on roads. No heavy equipment will be allowed off-road. No track vehicles will be used for resource extraction.

Cultural and socioeconomic
Ecosystem health will have priority over short-term economic health. Long-term economic health will have priority over short-term economic health.

The Natural Selection Alternative of the South Deer Project will be a showcase demonstration project for sustainable relationships and practices. It will demonstrate economic solutions to the environmental/job dilemma, opening doors to sustainable cottage industries, added-value local enterprises, and increased tourism.

“In Oregon, the relationship between the environment and the economy is changing. Industries that extract raw materials are stagnating, while industries that benefit from the presence of environmental amenities are growing rapidly.”(20)

Harvest volumes
Natural-selection-based extraction retains optimal green foliage across the landscape, thus optimal volume will first be attained, and then retained. As young cutover forests recover to late successional conditions, they will produce more products with greater values.

Certification
Products extracted will meet natural-selection-based criteria for sustainability. Forest health values will be prioritized through certification of stewards, products and processors. Certification of practitioners and resources will allow consumers to support sustainable forest practices.

Stewardship
Forest stewardships will be created and tailored for local, small (one- or two-person), sustainable

operations that will contribute to long-term stable local economies. Each steward(s), will have exclusive access to certain kinds of resources from a designated parcel of land. Parcels will be set up relative to available resources, geography, and logical access. Parcel size will be determined by the available resources that may be extracted sustainably under the NSA criteria for sustainability and the guidelines of the Medford BLM RMP.

Within three years, a majority of South Deer should be under stewardship contracts, all within five years. Existing roads will be used to start. Stewardship contracts with renewal options will be developed. Contracts will be jointly designed and approved by the community and BLM. People making forest practice decisions will receive on-the-ground training, apprenticeship, and continuing education to understand natural-selection-outcomes.

Monitoring

A research and monitoring program will be established to evaluate effects of using natural-selection-based criteria for sustaining long-term forest health, and the ability to produce a sustainable local economy. BLM's current baseline data will be important to the process. Non-entered areas will be used as control areas.

Species traits and the environment determine "natural-selection-outcomes." Human actions that change climate, soil, water, air, food, shelter, habitat and/or reproduction necessities, will be evaluated in terms of the "cumulative effects of natural-selection-outcomes".

Demonstration/Research Project

The Natural Selection Alternative of the South Deer Landscape Management Project provides an opportunity to apply natural-selection-based resource extraction concepts to community forests. Scientific research, community participation, permanent jobs, and tourism and recreation values are parts of this concept. Undisturbed heritage forests will provide educational opportunities unmatchable in any classroom.

Appendices

DCVNRCA comments Re: BLM Need for Action; BLM Issues and Concerns

Purpose of and Need for Action

- **Purpose of Action**

The purpose of the proposed action is to implement the Medford District Resource Management Plan. The purpose of this environmental assessment (EA) is to evaluate a range of alternatives, assessing regulatory compliance and efficacy in meeting project area needs. The EA will assist in the decision making process by assessing the environmental and human effects resulting from implementing the alternatives.

This EA tiers to the following documents:

(1) *Final EIS and Record of Decision for the Medford District Resource Management Plan* (RMP) (June 1995).
(2) *Final Supplemental EIS on Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl* (February 1994).
(3) *Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl and its attachment A entitled the Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl* (NFP)(April 13, 1994).
(4) *Final Supplemental Environmental Impact Statement for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines* (March 2000), and the *Record of Decision and Standards and Guidelines for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines* (January 2001)
(5) *Record of Decision* and the *Final Supplemental EIS to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines* (March and January 2004);
(6) *Record of Decision Amending Resource Management Plans for Seven Bureau of Land Management Districts and Land and Resource Management Plans for Nineteen National Forests Within the Range of the Northern Spotted Owl*, and its *Final Supplemental EIS for the Clarification of Language in the 1994 Record of Decision for the Northwest Forest Plan* amending wording about the Aquatic Conservation Strategy (March 2004).
(7) *Medford District Noxious Weed Environmental Assessment* (April 1998).
(8) *Final Supplemental Environmental Impact Statement, Management of Port-Orford Cedar in Southwest Oregon* (December 2003)

In addition to the documents cited above, project planning drew from information and recommendations from the following:

(1) *Deer Creek Watershed Analysis* (November 1997)
(2) *Rogue River/South Coast FY04-08 Timber Sale Projects Biological Assessment* (July 2003) and *USFWS Biological Opinion* (#1-14-03-F-511, October 2003).
(3) *USFWS Biological Opinion* (1-7-98-F-3211, September 1998)

(4) *2003 Survey and Manage Annual Species Review* (Forest Service Memorandum November 20, 2001, file code 1900/2620; and BLM Information Bulletin No. OR-2002-033).

Terminology used in this EA follow the definitions of the RMP.

1.2 Need for Action

BLM: Ninety-five percent of the South Deer project area lies in Wildland Urban Interface, designated by the National Fire Plan. Eighty five percent of the project area classifies into fire condition class 3. Condition class 3 results from a reduction in fire frequency. As a result, vegetation attributes, fuel loading, and fire behavior have been significantly altered. Condition class 3 represents a greater risk for increased fire size, intensity, and severity.

DCV: We agree there is a greater risk for increased fire size, intensity, and severity in the South Deer project area, but it's not in the late successional legacy forests, and it isn't because of "a reduction in fire frequency. It's the conversion of late successional forests to early successional tree plantations that caused a greater "risk for increased fire size, intensity, and severity."

> *"Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other recent human activity".*
> *--Sierra Nevada Ecosystem Project, 1996, final Report to Congress*

BLM: Forest stands, including upslope and riparian areas, currently lack species diversity and structure. Importantly, high stocking density and underbrush competing for light and water resources have reduced stand vigor and resiliency, prolonging succession toward a diverse stand condition. Low-diversity, over stocked stands provide poor wildlife corridors and instream large wood recruitment potential. Additionally, stand growth rates and resiliency to disease are reduced.

DCV: "High stocking density and underbrush competing for light and water resources" is a natural biologically and ecologically healthy condition. So called "overstocked stands" provide good wildlife corridors for many species. "Reduced stand vigor and resiliency, prolonging succession toward a diverse stand condition" implies a need for human intervention and treatment.

BLM: Streams in the project area do not provide adequate fish habitat. Bank erosion, lack of wood and little pool habitat were identified as limiting aquatic conditions. Present conditions are likely to continue into the near future. Approximately 50 percent of the riparian zone stands do not contain a large tree component necessary for instream wood recruitment. High road densities and culverts, leading to accelerated erosion and restricted aquatic connectivity, were also identified as limiting aquatic conditions.

DCV: Poorly designed and constructed high impact roads, not "High road densities and culverts", are "leading to accelerated erosion and restricted aquatic connectivity."

BLM: Matrix land allocation comprises 8% of the Grants Pass Resource area. The South Deer Project area includes 7,000 acres of BLM managed lands of which 4500 acres were designated matrix. As stated in the NWFP and the Medford Resource Management Plan, a major focus for matrix land allocation is to produce a sustainable supply of timber and other forest commodities to provide jobs and to contribute to community stability. The requirement to produce forest commodities was further emphasized in the settlement agreement between the forest industry and federal land management agencies which identified matrix and O&C land as the primary land allocations for forest product production.

DCV: Past forest management practices have substantially reduced the available timber supply. Current ecosystem productivity is below historic forest levels. No one knows how to restore a late successional ecosystem. Species that created those ecosystems will restore them if they are protected and allowed to do so. The remaining islands of late successional forests must be protected and preserved to restore the landscape. South Deer has 60.6% of matrix area within the Deer Creek watershed.

BLM: The proposed action is designed to meet a variety of resource, social and economic needs of the South Deer landscape including:

- Management of the watershed in a manner that will provide for and promote a wide variety of non-commodity outputs and conditions including wildlife habitats, sustainable forest conditions, fuel hazard reduction, recreation opportunities, maintenance or improvement of water quality, and fisheries.
- Contribution to the Medford District's timber harvest/forest products commitment on matrix lands, thus helping meet the demand for wood products regionally and nationally.

1.3 Project Location and Land Use Allocations

The project area is located in the Deer Creek 5th field watershed. Project area maps are in Appendix A. The project area is within matrix (Southern General Forest Management Area) and riparian reserve land allocations, with inclusions of spotted owl Late Successional Reserves. Management objectives for the different land use allocations (LUA) are set forth in the Pacific Northwest Forest Plan and the Medford District's Resource Management Plan (RMP). Refer to these documents for a discussion of relevant objectives.

1.4 Issues and Concerns

A variety of issues and concerns were raised during project scoping by interested individuals or groups outside the BLM and by BLM's interdisciplinary team. In this EA an issue is something unique to the project area that may need particular consideration and which may contribute to defining a particular action alternative.

Pertinent issues are listed below. Many of these issues were identified in the Deer Creek Watershed Analysis and were used in the design of the proposed project and alternatives. In some cases, an issue was initially considered by the planning team and then eliminated from further analysis because it was not within the scope of the project or did not meet the purpose

and need. These are summarized in Appendix E. The pertinent planning issues are:

1.BLM: High stand densities throughout the project area are resulting in declining vigor of conifers and shade intolerant species (i.e., ponderosa pine, sugar pine, black oak, Pacific madrone). Fire exclusion has contributed to growth stagnation in some stands as well as to slow seral stage progression/succession. There is recent mortality from drought stress and subsequent Mountain pine beetle infestation within the project area.

DCV: High stand densities are how environmental testing, and reproduction of best species traits are accomplished, how species adapt to ever-changing environments. Fire may remove some stems and make more room for others to grow, but this does not generally increase overall growth and generally sets back "seral stage progression/succession."

2.BLM: Fire exclusion has led to a departure from natural fuel conditions resulting in high fuel hazard conditions across the majority of the planning area.

DCV: Forest management practices are the leading cause of the "departure from natural fuel conditions resulting in high fuel hazard conditions across the majority of the planning area." Introducing fire in early successional forests is costly, and causes more problems over the long term than it solves. The late successional forests in South Deer don't have high fire hazard conditions. The challenge is to serve our needs without degrading other species' ability to restore early successional forests to low fire hazard late successional forests.

"The current popular and frequently repeated hypothesis about fires in the Klamath Mountains is that – as a result of fire suppression and other human activities – large fires are occurring more frequently and are larger and more intense than they were in the past (Atzet et al. 1988, USDA Forest Service 1994, 1995, 1996, 1998b, Brookes 1996). This position is predicated on assertions, that, because of fire suppression: 1) the number of fires in the region has declined over time, 2) fires are substantially larger today than in the past, and 3) large, intense fires are the results of unnaturally high levels of fuels accumulation. However, none of these assertions have been supported with empirical data from the Klamath Mountains or by analysis demonstrating that a change in fire frequency, size or severity has occurred from historic to present. If this hypothesis is not true, it may lead to inappropriate forest management and adverse impacts to regional biodiversity." (21)

3.BLM: Vegetation conditions combined with increasing rural residential development in the project area are continuing to increase the fire hazard and risk. The majority of the project area is within the designated Wildland Urban Interface (WUI)

DCV: Research for the Structure Ignition Assessment Model (SIAM) conclusions: "SIAM modeling, crown fire experiments, and WUI fire case studies show that effective fuel modification for reducing potential WUI fire losses need only occur within a few tens of meters from a home, not hundreds of meters or more from a home." "These research conclusions redefine the WUI fire problem as a home ignitability issue largely independent of wildland fuel management issues."(22)

4.BLM: The demand for recreation opportunities is increasing in the planning area, especially in the Lake Selmac area.

DCV: Another important consideration for this planning project is its location along the scenic Highway 199 corridor. Visual, spiritual, recreational, and tourism values have high relevance

5.BLM: In select areas, poor road drainage and culvert design has increased sedimentation and reduced migration of aquatic organisms.

6.BLM: Fish bearing stream reaches in the watershed provide poor habitat/channel conditions.

DCV: Actions in the Deer Creek watershed should be evaluated by their impacts on the outstanding and remarkable values of the Wild and Scenic Illinois River area.

DCV: The Deer Creek Watershed Analysis points out two ecological large scale issues/functions of concern: "(1) the condition of critical terrestrial linkage between the Deer Creek watershed and other provincial watersheds; and (2) the condition of the aquatic habitat particularly as it relates to salmonid species."(23) The few remaining isolated small islands of late successional forests are not ecologically connected, thus restricting and preventing dispersal of late successional species. The stream system of this watershed is "poor" when compared to the reference condition. Streams depend on springs and seeps to provide summer flows.

DCV: Submitted *14 Criteria for Sustainability* at BLM's scoping meeting, April 2004, for use on South Deer Landscape management Project.

Northwest Forest Plan

On April 2, 1993 President Clinton asked at the Forest Conference in Portland:

> "How can we achieve a balanced and comprehensive policy that recognizes the importance of the forest and timber to the economy and jobs in this region, and **how can we preserve our precious old-growth forests**, which are part of our national heritage and that, once destroyed, can never be replaced?

The President set forth five principles to guide the federal interagency effort to develop a strategy to protect the old-growth related species and produce a sustainable level of timber:

> President Clinton said, "First, we must never forget the human and the economic dimensions of these problems. **Where sound management policies can preserve the health of forest lands, sales should go forward**. Where this requirement cannot be met, we need to do our best to offer new economic opportunities for year-round, high-wage, high-skill jobs. Second, as we craft a plan, **we need to protect the long-term health of our forests, our wildlife, and our waterways**. They are gifts from God, and we hold them in trust for future generations. Third, our efforts must be, insofar as we are wise enough to know it, **scientifically sound, ecologically credible, and legally responsible**. Fourth, the plan should **produce a predictable and sustainable level of timber sales and non-timber resources that will not degrade or destroy the environment**. Fifth, to achieve these goals, we will do our best, as I said, to make the federal government work together and work for you. We may make mistakes but we will try to end the gridlock within the federal government and we will insist on collaboration not confrontation."(24)

14 Criteria for Sustainability ©

Based on Orville Camp's work, submitted by Deer Creek Valley Natural Resources Conservation Association as an alternative for the South Deer Landscape Project, Selma, OR

Forest Ecosystem Health

1. Forest ecosystem health (biological and ecological) must have priority over timber sale volume.

We depend on forest ecosystems for countless purposes and uses. Healthy forests are needed to sustain trees, meet other needs, and to protect us from fire; we cannot do this without prioritizing forest ecosystem health.

2. Seral stages of ecological succession will be retained across the landscape; older forest ecosystems must not be converted to younger ones.

Forests that are hundreds of years old are necessary for sustaining younger forests and human communities. Due to past forestry silvicultural practices, most older forests have been cut down, leaving early successional forests. This has resulted in later successional forest habitats being destroyed and species that depend upon them to become threatened, endangered and even extinct. There is no need to create more early successional forests, but there is a huge need to restore later successional forests.

3. Nature's processes select for removal: Only "weaker member" trees in the process of being replaced by "stronger dominants" may be removed.

Nature's natural selection process is key to sustainability. Natural selection sustains best genetic traits. Natural selection is the only time tested and proven process of selecting individual trees for removal in a way that will sustain forest ecosystem health. This new-to-us paradigm of relying on nature to select for removal is not clearly stated in either BLM's Standards and Guidelines or Record of Decision. We submit that is primarily because the process is not fully understood by current forestry decision makers.

4. Cutover or degraded forests must be restored; un-entered forests must remain un-

entered.

There are few un-entered forests remaining. These are needed to retain habitats for the few remaining later-successional communities to provide necessary scientific research models, and for restoration purposes. Natural forests provide insurance against irrevocable ecosystem failure. All cut down or degraded late successional forests must be restored to healthy condition (none have been). BLM must not enter any more uncut forests until they have restored the ones they've cut down, fully understand how they function, and know what it takes to restore them.

5. Habitats for naturally evolved species must be retained across the landscape.

Habitats for native species of terrestrial and aquatic species (including riparian areas) must be retained across the landscape, not just in designated patches and dispersal corridors.

6. Air, water and soils must not be degraded or contaminated.

Air, water and soil determine forest ecosystem health. Slash burning, fertilizing, and the spraying of pesticides that contaminate and degrade the environment must be prohibited.

7. Forest practices must not increase forest fire hazards

Lowest fire-hazard conditions exist in late-successional forests that contain large trees. Natural-selection-based resource removal practices, that are conditional on retaining habitat needs for evolved species, retain late-successional, low-fire-hazard conditions. Nothing shall be done to cause forests to revert to earlier successional ecosystems with higher fire-hazard conditions.

8. Harvest methods must be low impact: no helicopters or off-road heavy equipment such as mechanical harvesters.

Helicopters are one of the most dangerous, fuel-inefficient, and noisy machines ever devised for logging. Helicopter logging generally requires too much forest canopy removal. Mechanical harvesters are heavy, wide machines designed to replace chainsaw operators (thus eliminating jobs); they traverse the landscape, compacting soils and damaging forest structure wherever they operate. Both are degrading; neither eliminates roads. They require forwarding equipment and/or skid roads. Helicopters and mechanical harvesters must be prohibited in forest ecosystems.

Community Health

9. Long term community health must have priority over timber sale volume.

Forests cannot sustain timber productivity without retaining biologically and ecologically healthy ecosystems. Our local economy is declining because forest, water, and fish resources are declining. We must protect all forest resources and place community health above timber sales.

10. Aesthetic and recreational values must be developed and maintained.

Aesthetic and recreational resources hold far more value for the public than timber extraction.

11. Forest related jobs must be developed and maintained in the context of these criteria.

a) Forest jobs must be directly related to how well ecosystem health is retained. The healthier the forest ecosystem, the healthier the forest-related job market will be.

12. Timber Sale purchasers and timber harvesting contractors must be separate to avoid conflicts of interest.

Timber buyers focus on getting timber. To improve forest health, those selecting forest products for removal must prioritize overall forest health. Those who depend on the forests for all their products and uses, which includes the public, must focus on and prioritize retaining all forest values, not just certain kinds of trees. The DCVNRCA recommends that, in order to avoid conflicts of interest, individuals making timber purchasing decisions should be functionally isolated from those who are selling the timber.

13. **In order to create more local jobs, contracts must be designed for one- or two-person operations, thus allowing equal opportunities for all-size operations.**
    The best, most sustainable jobs are typically done by local, small (one- or two-person) operations. The community will also benefit from greater diversity of products and uses
14. **These criteria must not be construed to justify degradation of any forest ecosystem.**
    Forests must not be degraded; this is the number one priority. None of the above criteria shall be interpreted in any way that allows ecosystem health degradation.

Significant Features of Deer Creek Watershed

Klamath-Siskiyou Bioregion
The Klamath Siskiyou Bioregion, of which South Deer is a part, is one of the greatest reservoirs of biological diversity in North America. Its wild rivers contain some of the most valuable salmon and steelhead habitat in the contiguous United States. Many endemic species have survived here for millions of years.

South Deer Aquatic
Thompson Creek, McMullen Creek, Deer Creek, and Illinois River are critical, undammed tributaries of the Rogue River watershed.

Lake Selmac
Lake Selmac is located in the heart of the South Deer forest project. Lake Selmac provides camping, boating, fishing, beauty, and solitude.

Lake Selmac Equestrian and Hiking Trails
The Lake Selmac Campground, west, south and east equestrian trails, provide visitor access to surrounding forests. See west trail map: T38-R8-S13 OI Unit 4.

Lake Selmac Resort
The Lake Selmac Resort provides RV hookup sites, miniature golfing, boat rentals, food, etc.

Crescent City to Jacksonville Pack Trail
This 1800's trail traversed Sailors' Diggins in Waldo, Reeves Creek, Lake Selmac area of the South Deer Project, Mooney Mountain, and into the Applegate Valley.

Biscuit Fire
The Biscuit Fire, is located one mile west of Selma. The Selma Community and Education Center is planning an interpretive center for Biscuit.

Anderson West Lone Pine Trail
The easy to access, easy to hike Lone Pine Prospect trail leads through a mile of late successional legacy forest to a chromite mine created in 1941, and has views that include the Biscuit Fire.

Althouse Pack Trail
The 1800's Althouse Pack Trail extends from Sailors' Diggings in Waldo to Jacksonville via Thompson Ck. Remnants of this trail can still be found in the South Deer Project area, and Thompson Creek Overlook Trail connects to it (T38-R7-S27 OI Unit 4). See Historical Aulthouse Pack Trail Map: Exhibit 6.

Thompson Creek Overlook Trails
The Thompson Creek Overlook Trail System, approximately ten miles of looping trails, weaves through miles of late successional legacy forests to the top of Camp Mountain.

Rock outcroppings allow outstanding views of the Deer Creek watershed, Siskiyou Mountain Range and Coast Range. This area is used in DCVNRCA and community educational forest tours. It meanders through T38-R7-S22, S23, S26, S27, S35 and is accessed from old Aulthouse House Pack in S.27, S.35 from upper Thompson Creek Road, and from White Creek S. 23. See Map Exhibit 5

Horse Heaven
Horse Heaven is a serpentine outcropping covered with native grasses and other flora, a highly visible landmark from South Deer's Little Greyback Mountain area. Local folklore has it that early settlers ranged their horses there. One year the horses were trapped there because of an early, heavy snowfall. They all died and went to heaven. T38-R7-S26

Camp Forest
Natural-selection-based forest practices were first introduced at Camp Forest in 1967. People from around the world have come to Camp Forest to tour and learn how forest ecosystems function and how to have sustainable relationships with them. T38-R7-S27

Selma Community and Education Center
The Selma Community Education Center in downtown Selma is positioned to promote forest visual, spiritual, recreation, education and tourism values.

Literature Cited

1. Hammond, Herb. 1991. Seeing the Forest Among the Trees, The Case for Wholistic Forest Use, p 209

"Many foresters and timber managers would claim that it is not possible to develop broad principles for timber management–everything is site specific. In Part IV we discussed the current misuse of site specific management. However, the most important flaw in this argument is that a set of broad ecological principles exists which apply to virtually ***all forests****, whether the temperate rainforest on the west coast of British Columbia, the boreal forests across northern Canada, or the Acadean forest of eastern Canada. With regard to timber management, the foremost principle is this:* ***we need to have forests to have trees****. Whole forests, from the largest tree to the smallest bacteria, from vibrant life to death and decay–all are required to produce the timber yields that humans desire and claim to sustain.*

The other important ecological principles which must be respected are not numerous, but from them we can derive ecologically responsible timber management practices for any forest stand:

The cutting and removal of even one tree is an unnatural event*. Large old trees require hundreds, perhaps thousands of years to grow. Once cut, you can't stand them back up again. Orville Camp, well-known advocate of selection systems of timber management, says, "When in doubt, don't!" Good advice for ensuring that both forests and human options are maintained. I am not suggesting here that we should not cut trees. However, I believe it is important to remember that nature never removes the bodies. If we intend to "mimic nature." we must do it humbly and we must start here.*

Each forest stand needs old trees, snags, and fallen trees*....*
Disease and insects are essential parts of a fully functioning forest*...*
Over time, all forest phases must occupy every forest site*...*
Sustainable timber yields require sustainable forests*...*

2. Hammond, Herb. 1991. Seeing the Forest Among the Trees, The Case for Wholistic Forest Use, p 74.

"Foresters have explained that decadent trees are rotting faster than they are growing, thereby "wasting" forest space...According to Dr. Jerry Franklin, Wood accumulations in old growth forests are usually stable over the long run. Stands generally will not disappear in decades or even centuries as a result of mortality and diseased."

3. Tiedemann, Arthur R., Klemmedson, James O., and Bull, Evelyn L. *Solution of forest health problems with prescribed fire: are forest productivity and wildlife at risk?* Forest Ecology and Management 127 (2000) Pg 9-10

"Long-term productivity is a concern in developing strategies to solve the forest-health problem (Gast et al.. 1991; Wickman. 1992; Everett et al., 1993). Objectives for achieving sustainable productivity have not been well defined for Western forests, however, and existing guidelines are vague. Everett et al. (1993) suggest that forest managers define desired. future stand conditions and focus management efforts on achieving them. Any prudent plan should describe management goals in terms of forest productivity, biodiversity, wildlife habitat, and other resource outputs and values.

A primary concern whenever prescribed fire is used in forest management is loss of nutrients and impaired site productivity. This concern increases with changes in nutrient status that accompany successional advancement of forest systems in the absence of periodic fire. These changes usually involve increased accumulation of nutrients above the ground, much of it in the forest floor, and raise concern about the fate of these nutrients with careless use of fire or failure to consider fuel nutrients in fire plans. if sites that can be burned are treated without harvest, much of the nutrient capital accumulated in the forest floor is vulnerable to loss. If sites are harvested and residues are burned, not only will nutrients removed in trees be lost, hut also — potentially—much of the nutrient pool in slash and forest floor, depending on burning conditions. Thus. the potential to adversely affect long-term site productivity is always present. Evidence of reduced productivity is shown in the simulation model developed by Keane et al. (1990). Their 200-year simulation model compares development of basal area of ponderosa pine, western larch, and Douglas-fir under regimes of no fires with basal areas of the same species under fire intervals of 10,20, and 50 years. At a fire interval of 10 years, the basal areas of ponderosa pine and western larch were predicted to decline by 50% or more in 200 years. Reductions of basal area of both species were predicted at the 20-year interval, but not as dramatically as with the 10-year interval. Under the 50-year interval, basal area of ponderosa pine and Douglas-fir both increased and that of western larch declined. The model indicated that, in the absence of

fire, basal area of Douglas-fir would. increase steadily to the year 200. Although basal area of ponderosa pine and western larch declined, the total basal area predicted for the site was greater (ca. 70 m² ha¹) than that with any other simulation. The 50-year fire-interval simulation provided the next greatest basal area of about 50 m² ha¹.

Landsberg (1994) provides the most comprehensive assessment of the effect of prescribed fire on forest productivity. In a review of more than 50 studies of the effects of prescribed fire on tree growth in the genus Pinus, she concluded that growth response can be affected by many factors: species, stand characteristics, tree characteristics, and burning conditions, The consensus of the studies, however, was that tree growth decreased after prescribed burning because of injury to crowns, roots, or both.

Concern for effects of burning on productivity was expressed as early as 1924 in a paper by Show and Kotok (1924) for pines and associated tree species in California. Powers (1991) concludes that productivity of forests has declined because of substantive losses of surface organic matter and declines in soil porosity as a consequence of harvest activities and burning. Boyer (1.987) reported that periodic burning of longleaf pine (P. palustrus Mill.) over a 10-year period for understory hardwood control reduced pine growth, regardless of season of burning.

Reasons cited for reduced productivity after prescribed burning vary. Landsberg (1994) summarizes several reasons: direct injury to tree sterns, crowns, and roots; reduction in microorganisms such as mycorrhizae, with concurrent reductions in nutrient availability; reduced photosynthetic capacity; and changes in carbon allocation.

The evidence indicates that losses from the forest- floor nutrient pool associated with prescribed burning can impair long-term productivity (Grier et al., 1989; Landsberg, 1992; Klemmedson and Tiedemann, 1995). The relation between fire-induced changes in the nutrient states of the forest floor and the actual productivity of the residual stand has not been established. Vose and Swank (1993) conclude that major pools of nutrients in woody material and the forest floor dictate a fire management strategy that places a high priority on maintaining an intact forest floor. They advise a balance between the desire to reduce logging slash and competition while minimizing forest-floor consumption. Observed reductions in growth of ponderosa pine after prescribed burning in central Oregon (Cochran and Hopkins, 1991; Landsberg, 1992) may be attributed to changes in the nutrient status of the forest floor/soil system (Monleon et al., 1997). They observed reduced mineralization of N in N-poor ponderosa pine stands in eastern Oregon for up to 12 years alter burning and concluded that this reduction may explain the observed pattern of long- term productivity decrease in these stands."

4. Hammond, Herb. 1991. Seeing the Forest Among the Trees, The Case for Wholistic Forest Use, Pg 74.
"..old-growth forests develop the highest quality wood fiber which will ever be produced in our forests...The rotation period of time at which a forester considers a tree to be "mature" is between 60 and 120 years for most species...Therefore managers of tree plantations plan to never again permit the growth of ancient forests and the development of the high quality, fine-grained wood they contain."

5. Hammond, Herb. 1991. Seeing the Forest Among the Trees, The Case for Wholistic Forest Use, Pg 32
"Old growth forests are much more than sources of timber. They play an important role in the carbon dioxide/oxygen balance by fixing immense quantities of carbon through photosynthesis. They are some of the world's greatest carbon storage reservoirs, buffering against global climate change. They provide critical fish and wildlife habitat, which is not replicated in young managed forests. They are the home of specialist organisms, such as certain mycorrhizal fungi and predator insects, which are necessary to protect young forests. They store and filter high quality water, an ever dwindling resource as we degrade more and more forest habitat. They furnish increasingly valuable public recreation and wilderness tourism destinations, supporting entire tourism industries in remote locations."

6. DellaSala, Dominick and Strittholt, James. Nd (recent). *Importance of Roadless Areas in Biodiversity Conservation: A Scientific Perspective, Executive Summary.*
"Small roadless areas share many of attributes in common with larger ones, including:

- *Essential habitat for species key to the recovery of forests following disturbance such as herbaccous plants, lichens, and mycorrhizal fungi*
- *Habitat refugia for threatened species and those with restricted distributions (endemics)*
- *Aquatic strongholds for salmonids*
- *Undisturbed habitats for mollusks and amphibians*
- *Remaining pockets of old-growth forests*
- *Overwintering habitat for resident birds and ungulates*
- *Dispersal"stepping stones" for wildlife movement across fragmented landscapes"*

7. Rapp, Valerie. 2004. *Western Forests, Fire Risk, and Climate Change*, USDA Pacific Northwest Research Station, Science Update, Issue 6

"Enhanced carbon storage in ecosystems is, in fact, a major goal of the federal program to address climate change. But another forest policy is to reduce fuels and thus fire risk in the West, a policy that can release stored carbon. This key observation links the fire and fuels issue in the West to the global carbon change issue. The two issues are fundamentally coupled, yet the proposed solutions are seemingly opposed."

"Two ways exist to limit the amount of carbon in the atmosphere, and thus reduce global warming. One way is to limit carbon dioxide emissions generated from burning fossil fuels. The second way is to sequester more carbon in ecosystems or bury it in geologic structures. In the Western United States, however, the conundrum would be how to balance carbon storage with reducing fuels and fire risk."

8. Cohen, Jack D. 2000. *What is the Wildland Fire Threat to Homes?* USDA Rocky Mountain Research Station, Fire Sciences Laboratory, Missoula, MT. Lecture presented to School of Forestry, Northern Arizona University, Flagstaff, AZ, on April 10, 2000

"The home ignition zone extends to a few tens of meters around a home not hundreds of meters or beyond. Home ignitions and thus, the W-UI fire loss problem principally depend on home ignitability."

9. Odion, Dennis C.; Frost, Evan J.; Strittholt, James R.; Jiang, Hong; DellaSalla, Dominick A., and Moritz, Max A. 2003/2004. *Patterns of Fire Severity and Forest Conditions in the Western Klamath Mountains, California*, Conservation Biology, Pages 927-936, Volume 18, No 4

"Treating the home-ignition zone as described by Cohen (2002) can almost eliminate the possibility of homes burning in wildfires. This would increase fire-management options and perhaps ultimately further conservation goals in the Klamath-Siskiyou ecoregion."

10. Odion, Dennis C. 2004. *Comments on the Biscuit Post-Fire Logging Draft Environmental Impact Statement.*

"However, all fire history studies that have been done in the region, based on scarred trees, have found a wide range in fire intervals, long fire fee periods, and that the range in fire intervals is a more important property than the mean (summarized by Frost and Sweeney 2000). Agee (1991) found a pre-settlement fire-free period greater than 100 years at nearby Oregon Caves. Over time scales beyond the last few centuries, there has not been any stationary amount of charcoal accumulation (Mohr et al. 2000), a measure of fire's importance on the landscape over time. Fire has been both more and less common over meaningful time scales compared to recent centuries; there is no average tendency because of climatic variability. The description of historic fire intervals in the DEIS needs to be rewritten to accurately reflect high variability and non-equilibrium tendencies. These properties are associated with high levels of biodiversity (Odion et al. In Press).

The Tree-based fire history studies have ignored the longest fire intervals experienced by most trees, the one prior to the first fire scar on sampled trees, which can only be estimated (Baker and Ehle 2001). These fire history studies also use methods that extrapolate fire from a point location across space, which further over estimates fire frequency. Finally, areas sampled in fire scar studies cannot be assumed to represent the entire landscape; they are the locations where fire has operated in a way that has allowed for concentrations of trees scarred by low severity fires to develop. These may be unique locations where lightning and human ignitions were frequent, and fire size small." ... "Most importantly the DEIS rationalizes timber harvest as a means to return a regime of relatively frequent fire at regular intervals. This fire regime would be unnatural, and would not allow for the landscape diversity that has existed historically."

11. Odion, Dennis C.; Frost, Evan J.; Strittholt, James R.; Jiang, Hong; DellaSalla, Dominick A., and Moritz, Max A. 2003/2004. *Patterns of Fire Severity and Forest Conditions in the Western Klamath Mountains, California*, Conservation Biology, Pages 927-936, Volume 18, No 4

"In our study area, harvest treatments to reduce fire severity based on a model of fuel build-up in the absence of fire would be misdirected because long-unburned areas exhibited the lowest fire severity."

12. Tiedemann, Arthur R., Klemmedson, James O., and Bull, Evelyn L. *Solution of forest health problems with prescribed fire: are forest productivity and wildlife at risk?* Forest Ecology and Management 127 (2000) Pg 6

"The forest floor is a key component in the biology of forest ecosystems, but it is probably more affected and more likely to be lost by fire than any other component of forest ecosystems (Page-Dumroese et al., 1991). According to McNabb and Cromack (1990), "The most important criterion for reducing nutrient losses from prescribed burning is to minimize the loss of the forest floor." With low intensity wildfires and, in many prescribed fires, the forest floor may be the only part of the forest to burn. If forest floor is viewed only as the annual accumulations of dead plant and animal remains, loss of forest floor may seem inconsequential, even when fire is used frequently in pursuit of short-term goals of productivity or naturalness (Sackett et al., 1993; Covington et al., 1997). But, when viewed in terms of the complex chemical, physical, and biological processes that take place during decomposition of these dead organic resources (Swift et al., 1979), loss of forest floor by burning does have consequences that warrant careful consideration. Decomposition in the forest floor performs two major functions — mineralization of nutrients and the formation of soil organic matter (Swift et al., 1979); both are key to long-term ecosystem productivity and stability. When the forest floor is burned too frequently, nutrient replenishment and organic matter formation are diminished. Other roles and attributes ascribed to the forest floor are that it serves as the essential linkage between nutrient cycling processes, both above- and belowground; provides protection to the soil surface and improves soil architecture; facilitates water absorption and retention; and moderates soil temperatures (Kittredgê, 1.948; Harvey et al., 1976; Wells et al.. 1979; Page-Dumroese et al., 1991)."

13. Odion, Dennis C. 2004. Comments on the Biscuit Post-Fire Logging Draft Environmental Impact Statement.

"Prescribed burning following a fire free period of 40 years was found to eliminate the non-sprouting manzanita (Arctostaphylos morroensis (Odion and Tyler 2002). The same immaturity risk has also been described for knobcone pine (Keeley et al 1999). It may apply to a number of species in the Biscuit Fire area. Because this risk is a widespread phenomenon, excess fire is generally more of a threat to biodiversity than a lack of fire, and this threat has been realized in much of the world due to human ignitions (Bond and van Wilgen 1996)."

14. Baker, William L. September 1994. *Restoration of Landscape Structure Altered by Fire Restoration,* Conservation Biology, Vol 8 No 3. Pg 763-769

"Unusually large fires would probably hasten the restoration of landscape structure, while small prescribed fires will not restore the landscape, but instead will produce further alteration."

15. Baker, William L. September 1994. *Restoration of Landscape Structure Altered by Fire Restoration,* Conservation Biology, Vol 8 No 3. Pg 763-769

"... Small prescribed fires should be used only in special circumstances to accomplish species-level restoration goals, recognizing that repeated use of such fires will have a cumulative adverse effect on restoration goals at the landscape levels."

16. Frost, Evan J and Sweeney, Rob. 2002. Fire Regimes, Fire History and Forest Conditions in the Klamath-Siskiyou Region: An Overview and Synthesis of Knowledge.

"Lastly, it is important to recognize that the insights offered here represent a poorly developed "state of the art" because we currently have a very incomplete understanding of the role of fire in these forests, how this role has changed over time, and the most effectual means for restoring forests degraded by past management. There are significant risks associated with decisions made in the face of this high level of uncertainty. While ecosystem management plans will be developed in the absence of complete understanding, widespread application of highly intrusive treatments under the auspices of restoration could lead to further damage of the Klamath-Siskiyou region's forest ecosystems."

17. Tiedemann, Arthur R., Klemmedson, James O., and Bull, Evelyn L. *Solution of forest health problems with prescribed fire: are forest productivity and wildlife at risk?* Forest Ecology and Management 127 (2000) Pg 4

"The next question is about the feasibility of returning these stands to a condition that emulates pre-settlement species composition and spacing (even if we knew what they were). Emerging ecological theory on community thresholds, stable states, and succession (Laycoff, 1991; Tausch et al., 1993) suggests that this task may not be simple. Nearly 100 years of fire exclusion, possible climate changes, and past management practices may have caused these communities to cross thresholds and to reside now in different steady states. If so, returning to some previous condition may be difficult to achieve, expensive to maintain, or both. Baker (1992) is straightforward in his conclusion that "landscapes that have been altered by settlement and fire suppression cannot be restored using traditional methods of prescribed burning, which will simply produce further alteration."

18. Hammond, Herb. 1991. Seeing the Forest Among the Trees, The Case for Wholistic Forest Use, Pgs 66-67

"The Ministry's claim that slash burning releases nutrients to support new growth is plainly at odds with natural processes. The foliage, branches, and stems of trees–whether logged or naturally fallen–serve as a storehouse of nutrients for a new community of forest plants. This storehouse is designed to be released slowly, over centuries. Once nutrients are released from this woody debris in a form available to plants, they are no longer stored for a long period. Nutrients are water soluble, and many leach rapidly through the forest soil and away from the site. Slash burning releases a "flush" of nutrients which does indeed produce a short-term "flush" of growth. The ultimate result, however, is a longterm reduction in the nutrient pool available for tree growth.

The final purpose for slash burning, according to the Ministry , is to reduce fire hazard. However, the actual level of fire hazard created by unburned slash must be weighed against the very real damage done by slash burns which escape into living forests and burn out of control every year...."

19. Tiedemann, Arthur R., Klemmedson, James O., and Bull, Evelyn L. *Solution of forest health problems with prescribed fire: are forest productivity and wildlife at risk?* Forest Ecology and Management 127 (2000) Pg 7

"...With maturity and later successional stages, the forest floor becomes an increasingly significant pool of nutrients in the cycling process (Rodin and Bazilevich. 1967; Odum, 1969; Page-Dumroese et al., 1991)."

20. Lorah, Paul and Southwick, Rob and Southwick Associates. 2000. *Historical Economic Performance of Oregon and Western Counties Associated with Roadless and Wilderness Areas* 8.

21. Frost, Evan J. and Sweeney, Rob. 2002. Fire Regimes, Fire History and Forest Conditions in the Klamath-Siskiyou Region: An Overview and Synthesis of Knowledge.

22. Cohen, Jack D. N.d. *Reducing the Wildland Fire Threat to Homes: where and how much?*

23. U.S. Department of the Interior, Bureau of Land Management, Medford District, Grants Pass Resource Area. 1997. *Deer Creek Watershed Analysis*

24. President Clinton guiding mandate: Forest Ecosystem Management: An Ecological, Economic, and Social Assessment. 1993. And *Underlying Needs and Purposes*. 1994. Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional and Old Growth Forest Related Species Within the Range of the Northern Spotted Owl.

The Natural Selection Alternative Promises to be a Beneficial Alternative for the Tourism Economy in the Highway 199 Travel Corridor

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2004

The Highway 199 corridor has more to see than any other road through the coast range of Oregon, California and Washington and for this reason offers one of the most important tourism development opportunities in the state of Oregon and California. Forest management planning can contribute to the recreational, educational or scenic resources that strengthen the sustainability and diversity of economic opportunities communities can gain from public lands. Management objectives that create a diversity of economic opportunities through tourism can cast a positive influence that brings international dollars into this country and creates jobs that cannot be exported or outsourced to other nations. The Highway 199 travel corridor is very important to the overall tourism development strategy of Oregon and state administrators are placing increasing emphasis on developing regional cooperative markets to attract national and international travel in Oregon (Davidson, 2004). All public lands within the Highway 199 corridor have the potential to contribute to this state goal as well as benefit communities along travel corridors that feed into Highway 199 from both California and Oregon.

The following information assesses the economic potential of tourism along the Highway 199 travel corridor, reviews local strategic goals for business development in Illinois Valley, assesses travel industry trends and target audiences who are most likely to use the Highway 199 travel corridor and the resources that motivate them to travel. These will be compared to the objectives of the Natural Selection Alternative (NSA) to predict how this plan may contribute to increasing the sustainability of the travel industry, meet strategic planning goals for Oregon's lowest income community and assess how these resources will influence a positive travel experience that increases the potential of future travel clientele through positive word of mouth promotion.

The Economic Potential of Tourism in Illinois Valley

The Illinois Valley is bisected by Highway 199, a popular travel route between Redwood National Park and Crater Lake National Park as well as a corridor for visitors who travel from the cultural center of Ashland to visit the coast and Oregon Caves National Monument. Most visitors traveling this route come from the metropolitan communities of Portland or San Francisco (Rolloff, 1995). Visitors commonly travel from the metropolitan areas along the coast to Redwood National Park and then follow Highway 199 inland to Crater Lake before returning home. The Highway usually has an annual traffic load of about one million vehicles. In 1992, the state estimated that 289,000 vehicles, about one third of the vehicles traveling on Highway 199, represent tourist traffic (Wetter, 1994). An estimate of tourist spending in Illinois Valley can be obtained from surveys conducted at Oregon Caves National Monument, an attraction that gets almost all its visitor traffic from Highway 199. Surveys conducted at Oregon Caves National Monument in 1995 indicate the average daily spending per group to be $90 (Stynes, 2001). Assuming that each group travels together in one vehicle and the average spending per group is $90, the approximate potential tourism dollars traveling on Highway 199 through the Illinois Valley would be about 26 million dollars annually. Considering that daily spending in adjacent California counties is higher (Del Norte=$131, Siskiyou-Trinity=$124, Humboldt=$153) the estimate obtained from the Oregon Caves survey is low but is nevertheless adequate to illustrate that there is a high potential for making money if tourism attractions can be developed to encourage visitors to spend more time in Illinois Valley. Note: A survey conducted at Oregon Caves in 2003 produced a daily average spending estimate of $135/day (Hogar etal, 2004).

Tourism is an important industry and contributes an annual income of about $95 million dollars to Josephine County and about six billion annually to the Oregon economy. Tourism is extremely important along the Highway 199 corridor because this route has more to see than any other coast mountain travel corridor in Oregon, California and Washington and this makes it one of the most important tourism development opportunities in Oregon as well as California because travel from metropolitan areas in both states benefit communities in the Highway 199 corridor as well as communities in travel routes that feed into and out of Highway 199. Forest management on public lands in the Highway 199 corridor will make larger economic contributions to local and state communities if land management practices can be used to contribute to tourism resources that create diversified and sustainable business opportunities.

Tourism identified as the number one business opportunity in Illinois Valley

Over the past five years, a significant movement has taken place to establish a destination tourism environment in the Illinois Valley. Several positive things have happened as a result. The Bureau of Land Management is working to install a wheelchair accessible botanical trail in an area of botanical interest at the foot of Eight Dollar Mountain. The Oregon State Parks Department is planning to construct a large campground at the Forks State Park near Cave Junction. The town of Cave Junction has begun a project to decorate the fronts of buildings and make flowerbeds using rocks representative of the Eight Dollar Mountain Botanical Area and Kalmiopsis wilderness. The intention of this and other projects is to spur visitor interest in the area and provoke visitors to explore and spend more time in the area. A one hundred page Action Plan for Sustainable Tourism in the Illinois Valley was completed in June, 2003 to help identify how a destination environment that retains visitor spending can be created.

Tourism development and preservation of resources are both goals of the *Illinois Valley Strategic Plan for Community Development*, a plan that was generated as a result of this community being Federally designated as an Enterprise Community. Federal grants were provided to develop the plan which contains strategies that the community has been slowly working to attain. A large element of these strategies focuses on tourism and education and include:

Business development:
Produce new jobs in the Illinois Valley by creating a viable destination (tourism) industry. Increase visitor length of stay, develop Ecotourism attractions and market the area's unique combination of rugged charm and character.

Quality of life:
Educate the community and newcomers about the importance of healthy riparian zones for the maintenance of water quality and aquatic habitat.

Restore and protect the natural environment and the ecologically significant areas that maintain the quality of life that attracts visitors and residents to the Illinois Valley.

Tourism planning and development in Illinois Valley has focused on experiences and opportunities that appeal to the Geotourism and senior traveler market. Tourism constitutes a sustainable, multimillion dollar industry for the communities of Illinois Valley, Josephine County and the state of Oregon. Projections by tourism organizations indicate that tourism will experience a pronounced increase over the next two to three decades. It is important that land management agencies work with the community to assure that scenic values, educational experiences and opportunities to see nature are both preserved and accessible.

Illinois Valley Travel Industry History and Performance

Visitors driving through the valley on Highway 199 have traditionally slipped through the fingers of business owners and other travel oriented businesses in the Illinois Valley. This is illustrated in a 1995 survey at Oregon Caves that revealed the majority of visitors to be “drive through” travelers who are coming from one destination and traveling to another (Rolloff, 1995). A typical traveler spends about three to four hours at Oregon Caves National Monument and then departs without spending any time in other areas of the valley. Few indicate they are repeat visitors. About five percent of the visitors going to Oregon Caves in 1995 stayed in Illinois Valley lodging and another five percent stayed at local campgrounds.

Community members of Illinois Valley are aware that very little of the traffic on Highway 199 stops in the Illinois Valley and understand that there needs to be more to attract visitors to stop and spend time. Since Oregon Caves is considered to be the premiere tourism site in the valley, many business owners often discuss how to increase visitor travel to the monument as a way to increase tourism spending in Illinois Valley. However, the ability of the monument to support increased tourism must be balanced with resource protection issues and safety issues associated with tours becoming too crowded. For this reason, tourism proponents are looking to other parts of the Illinois Valley for tourism attractions that can be used to capture tourism dollars and to position Illinois Valley as a destination environment. To be effective at selecting the right kind of attractions, planners need to understand the traveling public.

Recent research indicates a growing interest among travelers in local culture and history (Stueve 2002). For this

reason, discussion on tourism development in Illinois Valley has focused increasing attention on preserving cultural resources such as the wood products industry, which has been a significant part of the Valley's cultural heritage for decades. This idea could be widely embraced because most residents and environmental groups and wood product advocates recognize fuel reduction for forest health, community safety and productivity to be common ground. The proponents for tourism development are among the people who feel there is an opportunity in the Selma area where forest management on BLM land can accomplish several positive goals to include: our wood product industry is retained as a cultural resource in the community, residents get the forest thinned while at the same time preserve the scenic values that contribute to their quality of life and the tourism industry gets a resource that helps stop visitor traffic in Josephine County. Tourism development also provides the BLM with an additional benefit of collaboratively educating the public about forest management objectives with examples that the public can visit. This has the potential of educating a large segment of residents from communities and metropolitan areas in western states and is an opportunity to mitigate misunderstandings about forest management and build public trust. I personally anticipate that all parties in Selma area and Illinois Valley would want to cast a positive light on management goals supporting an economy that benefits the wood product industry, local community residents and travel businesses. There would also be a strong support from the State Tourism Council because it supports themes that build a compelling tourism resource for attracting interstate and international travel and meets Oregon State Economic Development Department goals for creating a diversity of sustainable jobs in Oregon.

Visitor Profiles for Southwestern Oregon

Understanding travel industry trend, behavior of the traveling public and resources that motivate the public to travel are essential to making sound decisions about travel industry development strategies. A survey conducted in 1995 at Oregon Caves provided the following information about visitors traveling in southwestern Oregon (Rolloff, 1995);

Visitor Education: 42% of visitors have a college education and half of these had a graduate degree.

Visitor Income: The average annual income for visitors to Oregon Caves was $50,000.

Reasons for Travel: The top reasons for travel were viewing scenery, doing something with the family, and to learn more about nature.

The 1994 Tourism Assessment for Illinois Valley cited a Siskiyou National Forest District-Four Recreation Survey that indicated the primary reasons for tourism activity included visitor interest in viewing scenery, auto travel and hiking/walking (Wetter, 1994). Similar interest is also seen in Oregon state travel profiles which states, "people come to Oregon to indulge their interest in outdoor recreation, nature experiences and historic sites". They also noted many Oregon travelers are engaged in a family oriented trip (Longwood, 1997).

A recent survey conducted by the National Geographic Society in conjunction with the Travel Industry Association of America (TIAA) indicates that a large sector of the travel and tourism industry will be influenced by a growing public interested in the human and natural attributes that make one place distinct from another (Stueve, 2002). The survey grouped these individuals into a travel class they label as Geotourism. This group represents about 55 million Americans, which is greater than one third of the total 154 million American travelers. The survey indicated Geotourists share a general agreement that their travel experience is better when the destination preserves its natural, historic, and cultural sites. Over half (53%) of Geotourist agree that their travel experience is better when they have learned as much as possible about their destination's customs, geography and culture. The majority of these travelers are Baby Boomers (43%) and Senior Matures over 65 years (27%) comprising together 70% of the Geotravel sector, a total of about 38 million Americans. About 45% of Geotourists have a college education.

The age of travelers is an important consideration and the large number of retired now entering the travel market gives reinforcement to the need for accessible, low impact recreation. There are 50 million disabled in the United States and 60-70% of these individuals are "Senior Matures" who are 65 years or older. Senior Matures comprises 16% of all domestic trips in America. "Junior Matures", age 55-64, comprise 15% of domestic trips and 45% are "Baby Boomers" whose first members reached age 55 in 2001 (Rhoades, 2001). There is a large sector of the traveling population who are entering the age where disabilities will become an issue and accessibility to recreation resources will become increasingly important. The senior market is approaching explosive proportions and, in order to capture this market in Illinois Valley, it will be important for land management agencies such the USFS to support local communities by planning and preparing to serve the needs of mature travelers.

An insight to activities that might appeal to seniors can be found in a survey conducted by the Outdoor Recreation Coalition of America (Marwick, 1997), which identified activities such as walking and observing nature as being

important senior activities. They also noted that walking was the top activity in the United States with bicycling, hiking and bird watching close behind. Hiking footwear ranked as the highest growth area among outdoor recreation retailers. An interesting component of the survey noted there is an increasing interest in American society to reunite families and participate in activities that allow for group participation. As this trend becomes established, the growing senior market will also have the potential to bring younger sectors of society into the travel market as part of the national trend to reunite families and do family oriented activities. Trails and accessible nature experiences will be important in attracting these visitors to the Illinois Valley.

Projections for nature-based tourism and travel by seniors and their families comprise a large segment of the traveling population. Surveys indicate these individuals are interested in nature and want to have opportunities for healthful exercise such as walking and hiking. The unique, natural resources of Illinois Valley have a tremendous potential for attracting the nature-based tourism travel sector. Surveys of visitors in the Illinois Valley disclose a high interest in viewing scenery, hiking/walking, family oriented activities and educational experiences so this trend may already be underway. If resources can be made accessible and appealing to the interest and needs of this sector of traveling Americans the Illinois Valley could enjoy a sustained, nature-based tourism economy for a minimum of three to four decades.

The Natural Selection Alternative

The Natural Selection Alternative (NSA) has objectives and implementation planning that contributes to tourism development goals and strives for outcomes that are attractive to the nature-based travel audience such as educational opportunities, attractive recreational resources and scenic integrity along the Highway 199 travel corridor.

Contour access route: The “concentric contour loop access system” has the potential of being used for recreational activities such as family oriented mountain biking, equestrian, or fitness walking. Accessibility for mobility impaired may be more feasible on a network of roads designed under this system. Alternative recreational uses of the contour loop system has the potential to increase quality of life, property value, and the potential for entrepreneurial enterprise on public lands.

Preservation of cultural lifestyles: Preservation of the forest extraction culture in a locally managed environment creates a travel resource especially attractive to the Geotourist travel sector according to a recent survey conducted by the Travel Industry Association of America (TIAA) and the National Geographic Society. The NSA vision includes income from forest management by individuals selected under this program as well as the potential for making additional income through conducting tours or educational programs.

Scenic values: The Natural Selection Alternative is likely to have little to no perceptible impacts on visual resources.

Educational opportunities: A wide variety of forest management topics can be offered as educational experiences for the nature-based travel sector, an audience who values and seeks family oriented educational opportunities. The educational opportunities that could be provided in the NSA will enjoy a certain charm because the educational programs will be provided by ecological oriented resident foresters who can put a face on forestry and give travelers a chance to interact with local personalities.

The NSA contributes to the resources that help to build tourism infrastructure and attain goals for creating a destination environment in the Illinois Valley. Cottage Industry entrepreneurs, artists, crafters, and host/service businesses will benefit from tourist retention. The NSA preserves or creates resources that are important to the nature-based travel audience, the fastest growing travel sector with the strongest potential for long-term sustainability. The management of public land that will bring the greatest benefit to the local community includes actions that preserve our local cultural wood products heritage, scenic values, and increase the opportunity for educational and recreational activities that bring families together and promote personal health.

Conclusion

The Highway 199 corridor has more to see than any other travel corridor through the coast range of Oregon, California and Washington and for this reason offers one of the most important tourism development opportunities in the state of Oregon and California. Forest management on BLM lands should consider ways to increase the number of tourism resources as a measure to have public lands contribute to a more diversified economy. With this approach it will be possible to get wood fiber and provide jobs, reduce fire hazards at the forest/community interface, create educational and recreational opportunities for capturing tourist dollars on Highway 199 and increase the quality of life and property value for residents. The NSA moves in the direction of accomplishing these

objectives.

The Oregon State Tourism Commission is currently focusing on the development of regional cooperative markets to create new business opportunities that attract both national and international travel in Oregon. For this reason, it is important that tourism planning in Illinois Valley be circumspect about creating or preserving resources that are relevant to the stories of potential partners in Oregon and California. Partnering across state and county borders will provide a more interesting and compelling attraction for visitors who want to experience unique scenic and natural areas. A variety of exemplary educational nature and cultural experiences are the foundation of nature-based tourism. The NSA moves in the direction of accomplishing these goals.

Experts in tourism and tourism economies acknowledge nature-based tourism and nature education to be the fastest rising sectors in the travel industry (Powers, 2004). Surveys indicate that more than 55 million Americans are interested in this type of experience giving credence to the substantial and sustainable future that nature-based tourism can bring to a community. Forest management practices that support central tourism themes will help to galvanize stories on geoecology, fire ecology and forest management into a high value visitor experience. High value experiences meet Oregon state goals for tourism development and will move Illinois Valley closer to community goals for establishing a destination environment for the valley. The economic benefits of working today to manage public lands with goals for community quality of life, fiber extraction, tourism and education will benefit the Illinois Valley and Josephine County for decades. The NSA offers a strategy for accomplishing these management goals.

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South Deer Landscape Plan Roger Brandt

6 January 2005

Abbie Josie, Field Manager, Grants Pass Resource Area
Medford District, Bureau of Land Management
3040 Biddle Road
Medford, OR 97504

Dear Ms. Josie,

In my professional capacity as a fire ecologist, I have been asked by the Deer Creek Valley Natural Resources Conservation Association to evaluate a draft of the South Deer Landscape Management Project, Natural Selection Alternative. The draft I received is dated 30 November 2004. The draft indicates that the Deer Creek Valley Natural Resources Conservation Association in collaboration with BLM, South Deer Forest Committee, Selma community and the larger community have collaborated on this alternative. I am not affiliated with any of these groups, nor have I been hired or paid to support any position. I am currently a research biologist with the Institute of Computational Earth Systems Science, UC Santa Barbara. I maintain a residence in SW Oregon, and have done fire research in this region. A CV listing my experience and publications is at the website listed above. My evaluation here is based on my professional judgment and experience in fire ecology, and my familiarity with the relevant scientific literature on fire and vegetation and disturbance/diversity relationships. I provide these comments in the interest of encouraging the use of ecological principles in public land management.

I endorse the management approach reflected in the Draft Alternative, even though it involves extracting timber, which will always have ecological impacts. The approach to extracting timber in this case appears to be a means of minimizing further damage and disturbance in the Watershed that could occur from future harvesting activities. Past logging disturbances have affected a considerable area of the South Deer Creek Watershed in a relatively short period of time. Natural disturbances over the same time period, particularly fire and insect pathogens, would probably have not amounted to as much disturbance over a similar amount of time historically for two reasons. First, fire and insect disturbances are believed to have occurred in a patchwise fashion, affecting relatively small portions of the landscape at irregular intervals (Whittaker 1960). Second, fire and insect disturbances are of lower overall magnitude than most past harvesting disturbances because the biotic legacies (woody biomass, seed banks, soil integrity) are not removed or disabled by natural disturbances. The Alternative recognizes correctly that a high degree of disturbance overall has occurred in the South Deer Creek, the effects of which are still evident. The Alternative correctly points out that there is no ecological need for the creation of more early successional habitat at this time. In particular, early successional habitat that lacks pre-disturbance legacies. Additional acute disturbances, particularly those of human origin, against which organisms have not evolved defenses, can be predicted from disturbance ecology principles to have a negative effect on species diversity in the Watershed. This would be counter to goals of maintaining biodiversity, which, as an ecologist, I feel are important.

Native organisms have also not evolved with deliberate burning, as it is typically applied in our region. This may involve pile burning, which sterilizes patches of soil, which then become prone to invasion by exotic species (Korb et al. 2004). Prescribed burning is also typically done during spring or after fall rain. Fires at this time do not produce the natural range of severities and other natural fire effects (Moritz and Odion 2004). These fires are lethal to numerous organisms that survive fire during the regular fire season, such as soil stored seeds that become seasonally sensitive (Borchert and Odion 1995). Nesting birds and dormant herptofauna may be adversely affected. Finally, out of season burns have been found to increase fuel loading (Show and Kotok 1924). Plant tissue is unusually sensitive to heat during the wet season, when tissue moisture content is high. Out of season burning causes much foliar mortality while often consuming very little surface fuel. These factors explain the findings that areas where out of season burns (e.g. spring, or after fall rains) were undertaken soon had more available fuel present after fire than existed beforehand (Show and Kotok 1924). For these reasons, I concur with the Alternative in its opposition to prescribed burning.

Importantly, the Alternative does recognize that the Watershed is a fire prone environment, especially with the amount of early successional vegetation that is present. The threefold strategy of maintaining remaining closed forest, treating areas where fire severity is most elevated due to human impacts (dense plantations), and focusing on the home ignition zone for protecting property from fire is a logical approach to fire hazards. There is no need to further increase landscape level fire risk by opening forests and promoting vegetation that has a self-reinforcing relationship with severe fire. Moreover, as Jack Cohen"s analyses have shown, the problem of home ignition is only effectively dealt with by treating the home ignition zone. The most important thing to treat in this zone is the roof of the home, if it is composed of wood shingles. I would like to see this mentioned in fire protection approaches in the Watershed, and I

hope that there is a creative way for BLM to assist homeowners in the most important step toward protecting homes from wildfires, having a non-combustible roof.

My only other substantive concern with the Alternative is whether the removal of weak trees would lead to numbers of snags and amounts of coarse woody debris that are sufficient for supporting wildlife. The plan suggests that snags will be managed for, but more specifics could be provided for reassurance. The are probably far fewer snags, and less wildlife that uses these resources in the Watershed now compared to historically.

It seems like the South Deer Watershed management could become a great example of collaboration between community and government stakeholders leading to sound management balancing ecological and economic goals. I sincerely hope that this is the case, and that the approach outlined in the Alternative is adopted. It would be a notable accomplishment for all involved. Please let me know if you would like further information or clarification of any of these comments. Thank you for your consideration.

Sincerely,

Dennis C. Odion, Vegetation Ecologist

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Dear Amie,

Thank you for requesting comments on your forward-looking Strategic Plan. I am a 67-yr old Professional Engineer with a lifetime of global experience in River Basin Management (RBM) and Restoration. I pioneered holistic appraisal of major projects (up to $200M), followed by RBM plans, and then introduced model water environment policies at all levels (central government down) in the UK. I retired from being a tenured Professor in Sustainable Environmental Management in London to return to river restoration on the US West Coast - and practice sustainable livestock farming. I have worked with land use planners at all levels.

I'm encouraged to write to you because of your new strategy to:

• *Increase participation of a wider range of stakeholders in local and state decision-making across the state.*

Your document articulates, in my view, a sound vision and supporting policies for Oregon, my adopted home since 1998 (I married a native Portlander who is a botanist and PhD fluvial geomorphologist, in 1996). In particular, I would like to underline two passages from your draft:

1) "*• Explore alternative (non-regulatory) methods that complement the existing landuse program to ensure a sustainable land supply for Oregon's agricultural and forest industries."*
2) "Complete scenario planning to meet greenhouse gas reduction targets adopted by the commission."

As a small farmer, I appreciate your concern over our diminishing farming land base. This results not only from direct development but also from the indirect effects of vandalism and harassment from adjacent urban dwellers whose food comes from supermarkets rather than local producers.

However, a 'sustainable land supply for Oregon's..... forest industries' brings to the fore the issue of publicly-owned O&C Land forest land being transferred to private forestry for the declared intent of subsidizing county revenues and creating jobs. While laudable at first glance, these benefits dramatically fail the community interest test on further inspection.

The adverse impacts on our actual economy, based on tourism and recreation/amenity, have been identified by economists as several times larger (distributed throughout our community) than the benefits that accrue to a few private companies. The jobs created by expanding forestry are offset several times by those lost. Added to that, the environmental and social costs of clear-cutting and pesticide spraying are externalized onto the human and wildlife communities and are only recently being recognized in their devastating extent. As a river basin management expert, I am only too familiar with the adverse impacts of conventional forestry on our river systems, our dwindling salmon stocks and all the wildlife for which the salmon is the indicator species - going way beyond the river corridor.

The good news is that there is an alternative, widely recognized and supported locally, that works with Nature to produce a sustainable timber harvest; it's called the Natural Selection Alternative and can be found attached to this email.

The need for replacing timber tax funding for our counties is clearly great, and a number of alternatives have been suggested to both Senator Wyden and Rep DeFazio. Adopting the NSA could also provide replacement revenue. However the expansion of logging activity in Oregon directly militates against your policy of meeting GHG reduction targets. Our forests are among the last remnants of the once-great forests of the US, and as such provide highly-valuable services in absorbing GHGs. We now know that increasing the cut will NOT increase GHG absorption (as once thought), and will place forestry even more clearly in the 'Problem' rather than the 'Solution' category.

I hope you will find my comments of interest, and look forward to your response; I'm sorry that it's so late in the day for comments such as mine.

Yours truly,

John Gardiner

A fo ben, bid bont. - Welsh proverb ('if you want to be a leader, be a bridge')

Dr. John L. Gardiner MBE, PE,
Councilor, City of Cave Junction
Siskiyou Alpaca
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cell: 541 415 2613

To: Senator Jeff Merkley & Amie Abbott
Re: Comments submitted by John Gardiner

The Natural Selection Alternative (contained as an attachment) provides a specific forest land management prescription that addresses many of the challenges and issues facing timber harvests in southern Oregon. Based on quantifiable sustained yield and genuine community collaboration, this approach reflects a pragmatic plan for economic, environmental, and wildfire security for our rural communities.

I write to endorse and heartily support the comments presented below and hope that the forest management objectives outlined in the Natural Selection Alternative will be incorporated in your future recommendations and policy initiatives.

Thanks,

Kenny Houck, Business Development Coordinator
Illinois Valley Business Entrepreneurial Center
(541) 956-7275 Office
(541) 415-0561 Cell
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From: John Gardiner [mailto:john.l.gardiner@gmail.com]
Sent: Wednesday, July 02, 2014 3:31 PM
To: amie.abbott@state.or.us
Cc: Jeff Merkley
Subject: Comment on LCDC draft Strategic Plan

Dear Amie,

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July 3, 2014

Land Conservation and Development Commission
635 Capitol Street NE, Suite 150
Salem, OR 97301-2540

Dear Commissioners:

As you may know, the League of Oregon Cities represents all 242 cities within the state of Oregon, providing assistance, training, and other services with a statewide perspective about the important role of local government. Therefore, we appreciate the invitation and opportunity to provide comments on the Department of Land Conservation and Development's (DLCD's) draft strategic plan for the next eight years.

The League has enjoyed working with the DLCD over the past years in trying to find ways and strategies for reducing the costs and burdens to local governments to perform the function of long-term land use planning. This partnership has led to productive work in the area of urban growth boundary (UGB) expansion and population forecasting. We looked forward to continuing the work of the DLCD and all the stakeholders have started with these efforts and are pleased that this draft plan is also looking to capitalizing on these partnerships moving forward. However, there are areas of contention within the land use system that have given rise to long delays as cities attempt to revitalize and invest in economic opportunities but the strategic plan is limited in the areas of assisting the land use system in addressing these conflicts.

While strategic goal 2 mentions strategies toward improving urban reserve planning and assisting the Metro area with employment land planning, there is no apparent move toward ending the conflicts that have delayed UGB expansions related to industrial lands across the state. For example, the cities of Woodburn, Springfield, and Newberg have all attempted to find solutions to creating economic development in ways that will allow them flexibility to attract multiple industries, all of which will have vastly differing land needs. However, these attempts at expanding the UGB have been locked in stalemates as stakeholders challenge these plans. Part of the new methodology for UGB expansion is intended to address this issue, but there needs to be a long-term policy change that allows cities flexibility to develop a land base that can attract a diverse group of employers that fit the region's workforce. In areas that are struggling to recover from the long decline of natural resource industries and a national economic downturn, there need to be new strategies that can be implemented to determine that land availability is not hindering the process of gaining new industry into an urban area. The strategic plan merely talks around this issue, but without directly discussing the conflicts between cities and other groups over industrial land planning at the UGB stage, it will be difficult to create the sustainable, vibrant communities goal 2 seeks to establish.

In addition, there is some discussion of providing assistance to communities to ensure that they maintain up-to-date plans which comply with the statewide planning goals, statutes, and rules. But there is a strategy that the DLCD and the commission should consider as a long-term policy task: easing the process for plan updates. Currently, cities will not update plans because an update to one piece will trigger the need to update the entire plan. This is a large and daunting process, which may not effectively use local government resources and can cause delay and expense that is unnecessary. Therefore, creating opportunities for cities and counties to complete targeted updating, without the investment that is required by a large overview, such as periodic review.

The League is encourage to see and emphasis on looking at the cost to create comprehensive infrastructure into urban areas and the need to work as a region in developing solutions. In addition, cities look forward to working with DLCD in developing resilience to all forms of natural disasters not just through data and mapping, but with assistance in creating hazard mitigation plans. As we are increasingly aware of the potential disasters to large groups of people through earthquake, landslide, and forest fire dangers, the better our local governments can work to prevent loss of life and property and to quickly recover when these disasters strike. But, we remain interested in the timing of implementing these new strategies. While DLCD is constantly working on projects, it remains a small department with many stakeholders and missions. Part of strategic planning is outline the timing and resources that will be necessary for implementing the new strategies while maintaining the current levels of service in current strategies. This draft does not provide that level of detail, which has been presented in other formats as the Department began this task. The League and its cities would like to see how the DLCD and the Commissions envisions taking on these new tasks over the next eight years.

The Department's plan is comprehensive and will require significant participation from all stakeholders in working on each of these strategic goals. The League is ready and willing to continue to work as partners on these goals to ensure that the land use system remains useful and works toward increased efficiency and clarity.

If you have questions or would like to have further conversations I can be reached at edoyle@orcities.org. Thank you for your consideration of our comments as this plan moves forward.

Sincerely,

Erin Doyle
Intergovernmental Relations Associate

LEAGUE OF WOMEN VOTERS®
OF OREGON

July 3, 2014

To: Carrie MacLaren
Deputy Director
Department of Land Conservation and Development (DLCD)
amie.abbott@state.or.us

Re: Comments on the Draft 2104-22 DLCD Strategic Plan

The League of Women Voters is a nonpartisan, grassroots political organization that encourages informed and active participation in government. The League supports our state land use planning program with local implementation. We also have positions in support of many of the policies listed in the five priorities included in the Governor's 10-year budget plan. We believe that these five priorities are interlinked as is our land use planning program. Land use planning is about where people live, work, play, shop and how they get there.

We appreciate the opportunity to comment on the Draft Strategic Plan for the department. We are impressed by the thoughtful work encompassed in the Draft. We hope the following will be considered before you adopt the plan:

1) "*The department's regional staff and program specialists provide technical and financial assistance to support local planning efforts.*" "*Increase community and economic development assistance to rural communities, in collaboration with the state's Regional Solutions Teams.*" Page 3

The League notes that the department is organized into Planning Services and Community Services. While the department often helps local jurisdictions with planning projects, especially through the Regional Solutions program, we continue to be concerned that the role of the Community Services division be completely independent from that planning support. Although DLCD has technical expertise to help with the **process** of planning, the department also is responsible for **review and deciding on compliance** with statewide planning laws and rules. These two disparate roles must be acknowledged and addressed. Oregonians must believe that the department will continue to be the watchdog for our statewide program while helping local jurisdictions comply with said program.

2) *"Support state and local planning to respond to climate change, address natural hazards, and create resilient communities."* Page 3

The League believes that addressing climate change is an important role for the department. Encouraging and assisting local jurisdictions to develop Climate Action Plans at the local level should be a clear strategy. Clarifying the above strategy to more clearly articulate that responsibility should be considered.

3) "*The protection of natural resources **lies at the heart** of Oregon's innovative land use planning program.*" Page 4

The League certainly concurs with the support for Goals 3 and 4 of the program. But we also believe that Goal 14 is **equally** at the heart of the program. This section of the Draft emphasizes one over the other. We ask that you find other words to recognize the importance of Goals 3 and 4 while also acknowledging the equal importance of Goal 14.

4) "*Develop a "non-resource lands" policy that is integrated with resource lands protections strategies. [Note: "nonresource lands are those rural lands that are not suitable for farm or forest uses due to the physical properties of the land, e.g., poor quality soils.*]" Page 5

The League is concerned and unclear related to the department's intent under the above strategy. While the department seems to recognize the possibility of conflicts between rural development and protecting our important farm and forest lands, this strategy doesn't acknowledge such conflict.

We do believe that there should be a strategy to recognize and address the cost of protection of structures placed in the wildland urban interface—usually zoned as rural residential. The cost of structure protection is now often being born by our state General Fund through the Department of Forestry budget while the actual work is being done by local city and rural fire department staff.

5) "*How communities are built and developed touches nearly every aspect of our lives: **how we get to work or school; and where we live, work, and play**.*" Page 6

Thank you. The League appreciates the "people-friendly" language. However, missing in the list is "shop". Commercial properties are an important part of a complete community.

6) "*Community resilience, enabling communities to reduce exposure to natural hazards and **respond to climate change**, is receiving increased attention within the department.*" Page 6

The League supports the department's increasing attention to issues surrounding climate change. We look forward to helping wherever we can because this issue will also touch nearly every aspect of our lives.

7) "***Community development activities will be enhanced to support local efforts to revitalize communities, seek public infrastructure solutions, and build community participation***
Core work: Planning and technical assistance for community development is currently provided on a limited basis, and upon request by local communities. ***Increasing capacity in this area is anticipated through participation in the Regional Solutions Teams."*** Page 7

The League is very supportive of the department's commitment to "build community participation". Without community support, revitalizing communities and funding infrastructure will not happen. However, the current Regional Solutions program will not increase this community support without better public outreach and interaction. The draft public involvement plan currently under consideration by the Governor's Regional Solutions program is not adequate to meet this strategy. We encourage the department to help enhance that public involvement plan.

8) "*Support local government planning for resilience, specifically targeting natural hazard and climate change mitigation*." Page 8

Again, the League appreciates the department's focus on climate change and the need to help our communities prepare for the extreme weather being brought on by climate change. Public safety is a critical concern with the potential for flooding, landslides, and other hazards expected as a result of climate change.

We are also concerned about ocean acidification and loss of our important estuaries. Sea level rise and higher wave action along our coast will require changes in coastal communities' Comprehensive Plans and Development Codes. Not related to climate change but equally of concern is our looming earthquake and tsunami threat which the department must continue to help local coastal communities address.

9) ***"Goal 3: Engage the Public and Stakeholders in Oregon's Land Use Planning Program"*** "*To address this, an ongoing information and education program should be established.*" Page 9

The League has been a strong supporter of the land use program's Goal 1. So seeing this issue as the department's Goal 3 seems to us to be a huge increase in priority for this issue which we applaud. The League has had members on the Citizen Involvement Advisory Committee and on local Committees for Citizen Involvement for a number of years. We have supported budget requests for increased staffing for department communication and for increasing education of the public regarding our now 40-year old award-winning statewide land use planning program with local implementation. The League stands ready to help the department implement this department goal.

10) "*Engage state agencies, in coordination with the Governor's office to implement provisions of the 2010 Climate Change Adaption Framework.*" Page 12

Yet again, the League is pleased to see climate change as a focus of the department's work.

11) "*Ensure that the policies and values of the statewide land use program are reflected in the process and outcomes of Regional Solutions Teams*." Page 12

As mentioned at the beginning of this letter, the dichotomy of roles asked of the department between assisting local jurisdictions with planning efforts and enforcing our statewide laws and rules is one of great concern to the League. The above statement

assures us that the department shares our concern and will be vigilant in addressing the challenge.

12) "*Improve the distribution and availability of geo-spatial data and scientific information to local governments and the public, emphasizing web-based methods*." Page 12

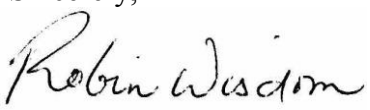
Missing in this statement is "other state agencies". The League believes that there will be better decisions by all agencies and there will be cost savings if data gathered by all agencies can be easily shared, particularly by use of compatible software.

13) "*Improve institutional memory and efficiency through better succession training*." Page 13

The League appreciates the recognition that we are going through a time where we are losing many long time planning staff to retirement. The loss of that institutional memory and competency could be devastating to our planning program without focusing on such succession training.

The League wants to commend the staff of DLCD for this thoughtful Plan. We are impressed by the breadth of the issues being addressed and the strategies listed. Thank you for considering our comments as you complete this work. We look forward to continuing to be a partner with the department staff in making Oregon the best place in the world to live!

Sincerely,



Robin Wisdom
President

Peggy Lynch
Natural Resources Coordinator

cc: Richard Whitman, Governor's Natural Resources Policy Advisor

Amie and Jim...

Thanks for sharing this with me. Several things occurred to me as I read through it...please feel free to share this with the Commission and whoever else you'd like:

1) Where is the Commission? It's odd to me that your website has no direct link to the Commission, and that your plan has no role for them. In general, the website is really hard to use and doesn't link you to who does what. The plan shares this problem....who is "staff" and what will they do? Anyhow, I think there should be a substantial section that speaks to the Commission, its role and vision for itself, the program, and the Department. Big void.

2) What will actually be done? I don't disagree with anything that you've written, but where is the piece that tells me what will be done and when? What are the outcomes of this plan? You say that you are concerned with outcomes, but this plan itself has none specified. At a minimum, there should be a matrix showing actions, priorities (both within actions and between them), resources to be applied/people responsible, outcomes expected, and dates of expected outcomes. Without that, this plan is, well, indecipherable.

3) What does success look like? That is, if you address all these things, what looks different? Is the most substantial goal survival--not inconsequential--or do you have something bigger, grander, more ambitious in mind? What does the environment you're/we're in call for...not just the state government environment, but the state of the state environment?

4) Finally, as you know, I am a huge supporter of the program. What do you want me to care about? How can I know that I'm caring about something important?

Again, thanks for sharing! Looking forward to the next decade.

Best!

Ethan

Comments on DLCD Strategic Plan submitted by the City of Springfield, Department of Development and Public Works, Len Goodwin, Director, Greg Mott, Development Manager, July 3, 2014

Our comments do try and address sections of the Plan in the order they are arranged in the Plan. In some cases these comments are directly associated with the strategy and the page on which the strategy appears. Other parts of this commentary are general observations.

Our first comment relates to the introductory section of the plan. Of course, we understand if suggestions for this section are too late in the making.

Add to second sentence of "Who We Are" (page 2)

"We work in partnership with local governments, and state and federal agencies ***in pursuit of the successful integration of these diverse responsibilities and outcomes within comprehensive plans***."

I think it's important to communicate to local government that partnership means something, that it's not just an activity that gets crossed off the to-do list once it's occurred. Partnership should reflect an expectation that *through partnership* the Department's objective will be blended with the objectives of local government and other agencies to create a better outcome.

Add to last sentence, first paragraph, "What We Do" (page 2)

"Recognizing that each city and county ***is presented with unique challenges as they undertake their comprehensive planning responsibilities,*** our job is to provide planning guidance and technical assistance that ***helps these communities plan for a future of realized goals***."

I read the existing statement to be a commitment to provide assistance to the process, not necessarily support for the outcome. Additionally, I think it's important for the Department to be on the record of acknowledging the variety of circumstances that can be present for one city and not for others requires a program ideology built on creativity, on a willingness to allow adaptive solutions and problem solving. For years the Department and Commission have heard "one size does not fit all" yet with few exceptions contained in the rules, every city over a certain population is subject to implementation based on the Department's interpretations; based on precedent; based on decisions from LUBA. Springfield is not Bend or Woodburn or Milwaukee.

Goal 1 Conserve Oregon's Natural Resources

Under New Strategies:

This first strategy is interesting, but I'm not sure how a land use program that is a mandate implemented exclusively through regulation contains a non-regulatory strategy, though that characterization may be generous in the presence of an outcome that will "ensure a sustainable land supply" a buried regulation if ever there was one. I think it would be fantastic if this proposal actually matured into a successful program, so I'll keep my fingers crossed.

In concert with this strategy, I think the Department might consider adding a strategy that recognizes farm and forest uses do not succeed simply because there is land protected for this use; the state and the counties (primarily) need to ensure that "infrastructure" [in support of agriculture] is developed, expanded and maintained. This includes road access, storage/distribution, processing, rail and shipping ports, etc. This could be accomplished with some kind of prioritization in RTSPs and RTPs; maybe less so in comp plans. In either case, this kind of strategy would need to be scalable. It might help, too, if the issue of "conflicting uses" wasn't defined solely as a choice between prevent or limit; there may be circumstances, particularly with ancillary use, where "balance" may be a workable sideboard.

Perhaps the coastal strategies should address rising sea levels impact on the economy of coastal communities. As more of the resource-based economies are scaled back, the environment as focal point for commerce is becoming more crucial; if rising sea levels are impacting these tourist-based activities, the coastal communities are going to need substantial updates of their comp plans and for the most part that work will bust budgets.

I agree that natural resources are the hope for our future, but the competition between land use inventories is already fierce and will only get more contentious if the reach ("better application") of Goal 5 increases without corresponding adjustment to the mandated land use categories. This will be most difficult for some of the smaller cities, but for larger cities already constrained by topography or water, required inventory of necessity turns to resource lands. Rule-making might be the best way to implement this strategy, but I think some kind of implementation formula with ranges to recognize different circumstances from jurisdiction to jurisdiction would be more effective.

Goal 2 Promote Sustainable, Vibrant Communities

The vernacular and doctrine of planning have evolved significantly in the past 30 years; I think that's great because I believe a dynamic culture is preferable to one in stasis, so in support of that dynamism we need new policies and practices to keep pace, to give shape and substance to these principles. I love the potential evoked by new urbanist terminology and some of the developments I've seen based on these fundamentals are in stark contrast to most other contemporary designs save for those that located in areas with solid DNA. However, unlike nature, where things happen as they may and, through unrelenting adaptation, persevere or perish, we like to think our control of inputs will inevitably lead to desired outcomes. It's a linearity that nature mostly rejects, but since anything can and will happen in nature we believe controlling the fundamentals will eliminate randomness; to do otherwise would invalidate why we make plans. And just as nature arrives at successful but unpredictable outcomes, most of those extraordinary places we all treasure have occurred, sprung up, evolved by natural selection; an organic process that involves the powerful attraction over time of sociability, commerce and attachment.

When we trust legislation to achieve what our nature proves is unpredictable, we impose that linearity model that nature tolerates only randomly. This is the kind of regulation that, because it fails to recognize uniqueness is largely random, generates friction between the private sector and government and between governments who oversee the regulation and those that must implement it.

Like others, these new strategies are singularly oriented towards increasing the challenges facing development. There is little sense of a need for balance and for a variety of perspectives. One of the missions of the agency is to facilitate development in a way not inconsistent with the conservation goals, yet there is no sense of that here.

The strategy to work with local and state government would benefit from some acknowledgment that one of DLCD's goals should be to find ways to incentivize actions consistent with its goals, not to prohibit those things that are inconsistent. Simplicity and efficiency should be accompanied by recognition that there can, and in fact must, be flexibility in how the Department chooses to interpret "goals" which are, in fact and in legal contemplation "goals" not mandates.

When the rules were changed regarding urban reserves, the City of Springfield had one of these designations at the eastern edge of our UGB. The change in rules invalidated the site; we could have used the exceptions process but that was/is so onerous, so thick with appeal targets that we simply chose to eliminate the designation. I would suggest that you design the rules for urban reserves to enable such a designation if it is the closest area to the UGB that encompasses at least 75% of its area with the highest priority soil classification or 75% exceptions lands or some kind of measureable standard. (First strategy on page 6)

Any proposal to simplify the Goal 14 process is a welcome activity from my perspective. Having served on the Governor's Urban Growth Advisory Committee from July, 2012 through April, 2013 I appreciate the emotion this subject generates. I also appreciate the stone cold negotiation that accompanies any attempt to modify these rules or amend the purpose of the Goal. It's my experience, both as a result of serving as a stakeholder as well as preparing a Goal 14 analysis for the city, that most opinions on the subject are so entrenched in a particular interest that any proposal that supports a different interest is regarded with suspicion, if not hostility. This prevailing mindset makes it virtually impossible to have a constructive conversation even at the conceptual level let alone an agreement on specific language. I wouldn't make this an impossible task by placing a near-term time limit on its completion. (Last strategy on page 6)

The strategy to complete scenario planning reads as if the Department, rather than ODOT has this obligation. If you meant to indicate your interest in assisting ODOT and the MPOs it would probably be better to be more direct in this regard.

I need to claim membership on another task force; The Affordable Housing Work Group, created by LCDC in May, 2008. We were tasked to investigate methods to increase affordable housing options, including consideration of exclusionary zoning, land banking, developer incentives, and relaxing certain standards of Goal 14 in exchange for a commitment to increase affordable housing supply or land supply for affordable housing. The work was intended to demonstrate that a particular bill, HB 2225 could be implemented; the work group couldn't succeed and that bill was not enacted. The impression I was left with is that the Oregon constitution prevents cities from adopting legislation requiring property owners to build affordable housing. The concept of the new strategy that calls for developing "effective housing affordability and housing choices" has just as much merit today as it did that last time around, but

clearing the constitutional limits to *achieve* the desired outcome, and not just *the ability* to achieve this outcome, remains insoluble. (Third strategy, page 7)

The concepts embodied in the strategies for revitalization are excellent, particularly bringing in the Regional Solutions Team for assistance. I do think that the first strategy in this group, improving the ability to develop well-functioning, well-designed, healthy communities will require a fairly detailed implementation framework because at its core, this strategy captures the essence of the intended effect of Senate Bill 100. Backing out of the end result by designing the process that gets you there is not an unusual formula, but it does require faith-based reliance on the linearity model which is, as I mentioned earlier, random and unpredictable. (Fifth strategy, page 7)

Planning for disaster recovery, whether by a single event or the gradual effect of bad things, is an excellent addition to our comprehensive plans. By this I mean that our approach, and the Department's acceptance of that approach, was to adopt a flood plain overlay management zone and a hillside development overlay zone. This isn't "planning" really; pretty much a simple exercise to write some standards for development. When the 1999 legislative session enacted SB 12 requiring DOGAMI to map areas of rapidly moving landslides, we began developing our ordinance; we stopped in 2003 when that legislative session enacted HB3375. Putting this back in place will be a benefit to all cities that have these hazardous areas in their developable lands inventories. (All strategies, page 8)

Goal 3 Engage the Public

I couldn't agree more about the importance of effective communication, whether it is intended as a general means of distributing information, or as a prelude to specific, forthcoming activities. I understand why you want to make a better connection with the public; I imagine they usually don't interact with you or the Commission until something controversial and of interest to them occurs. I suspect you believe that your interaction with local government is probably less effective than you'd like, but given the cutbacks you've endured over the last several biennia, I know it's been difficult to maintain the kind of immediacy that existed in the 70's and 80's. My suggestion regarding effective communication with local government is to establish a series of traveling presentations aimed at local staff and elected officials on specific topics that more often than not present challenges at the local level. For example, the cities of Woodburn and McMinnville were severely tested when attempting to expand their Urban Growth Boundaries. The outcome of these actions, both from the Department's point of view and the cities, probably lies somewhere between a cautionary tale and lessons learned, though I'm sure the elected officials of these two cities would refer to their experiences more colorfully. If the Department traveled the state presenting an analysis of what happened, perhaps why it happened, and definitely how to avoid what happened, many of us in local government would consider this effort to be keeping your promise to provide effective communication. You wouldn't need to limit the topics to calamities; presentations on new land use legislation or pending rule-making (Climate change for example) that eventually require local implementation would be very helpful and would affirm the Department's commitment to this Goal.

Goal 4 Provide Timely and Dynamic Leadership

This is a great goal and its key lies in knowing, and consistently acting on, the difference between leadership and authority. Authority is granted; leadership must be earned, perpetually.

It's interesting to me that you've chosen infrastructure as a topic that falls under this goal. This topic is generally itemized by subject such as freeway interchange, sewage treatment plant, etc. but this strategy speaks to everything and then some. It's interesting that your focus is on building new rather than maintaining our "crumbling" infrastructure. Maybe the topic of our widening inability to maintain our infrastructure should have found its way into Goal 2 under "resiliency." I know from first hand involvement that most cities are well behind the 8-ball when it comes to proper maintenance and repair of roads and bridges.

The fourth strategy talks about "keeping local plans up-to-date." This used to be accomplished through Periodic Review every 4-7 years; now it's every 10 years. (ORS 197.629) I think part of the reason for this longer interval came from HB2253 or HB2254 because both of these bills were concerned about the financial burdens of UGB amendments and population projections triggering impacts on buildable lands inventories. In any case, I was not aware that timely local plan updating was trending. This strategy clearly needs more detail, and that detail could be provided in a well-developed implementation measure. (Next to last strategy, page 11)

Goal 5 Deliver Services that are efficient, outcome-based, and professional

I like this written commitment to internal efficiency; we all could benefit from regular "Kaisen" events.

Thank you for this opportunity to comment on the DLCD 2014-22 Strategic Plan.