



Providing Opportunity to Family Forestland Owners

Date: July 20, 2016

To: Board of Forestry

From: Jim James

Re: Agenda Item 5, Specified Resource Site Rulemaking for Bald Eagles

My name is Jim James, Executive Director of Oregon Small Woodlands Association.

I propose a slight alternative to ODF's recommendation on new rules for the protection of Bald Eagles. I propose the rules be voluntary rather than regulatory.

The Bald Eagle has been delisted at the federal and state level. I interpret that to mean professional biologists have determined the Bald Eagle is at no risk of not being able to continue to exist in the Oregon landscape.

The federal government has for a long time determined some protection for eagles is needed and these protections are included in the federal Eagle Act.

In light of the current work loads of Stewardship Forests and the additional workloads we know are coming with the adoption of the upcoming riparian rules, I question whether it is appropriate for ODF to be charged with regulating federal policy, the Eagle Act. A voluntary rule will remove the burden of regulating for Bald Eagles and would still be a reminder to landowners of the federal laws around eagles they are obligated to comply with.

I think the Board should be thinking ahead about how ODF will accomplish the many mandates it already has now or will have in the near and distant future. There is no reason the Department staff should not enjoy the rewards of this success story, the delisting of the Bald Eagle, like the many landowners who have also made major contributions to this Bald Eagle's success story.

Thank you for considering my recommendation.