



# JACKSON COUNTY

Oregon

## Board of Commissioners

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June 13, 2019

Senator Ron Wyden  
Senate Committee on Natural Resources  
Subcommittee on Public Lands, Forests, and Mining  
304 Dirksen Senate Building  
Washington DC 20510

RE: Senate Bill 1262 – Oregon Recreation Enhancement Act

Dear Senator Wyden:

Jackson County appreciates the invitation from your staff to provide comments on the provisions of Senate Bill 1262 (SB 1262), the Oregon Recreation Enhancement (ORE) Act. While the proposed provisions of SB 1262 do not directly designate any land within Jackson County as a recreation area or as wilderness, we believe that changing the designation of the lands within the applicability of SB 1262 will have a direct impact on Jackson County and its residents. As such, we want to express those concerns to you and the Committee for consideration.

As you know, Southern Oregon, and particularly the Rogue Valley, has been devastated by the impact of wildfires occurring on what is largely Federally managed land, especially over the past two summers. While Jackson County itself has been spared somewhat, compared to other Southern Oregon and Northern California counties, from having large wildfires actually occurring within the boundaries of Jackson County, these large wildfires have had a direct and significantly negative impact on the lives of the people who live in Jackson County. The impact from the smoke of these wildfires alone has caused significant economic losses for businesses in our communities, has negatively impacted the health of the residents, and has resulted in numerous other negative impacts.

We believe that the designation of the identified public lands in SB 1262 as recreation or wilderness is going to have a negative impact on the ability of the Bureau of Land Management or the U.S. Forest Service to manage the lands to reduce the threat of wildfires. The public lands in Southern Oregon and Northern California are, without question, in dire need of fuels reduction projects of all types to reduce the threat and severity of the wildfires plaguing our communities. While the provisions of Sections 3(c), (4), and (5) of SB 1262 purport to authorize the applicable Federal agencies to continue to conduct vegetation management and wildfire management on the proposed lands which will be designated as recreation, those Federal agencies are, under the express terms of those subsections of SB 1262, required to conduct those management activities in such a manner which complies with, and is consistent, with the land being designated as recreation. The Federally managed public lands in our area are in such dire need of extensive fuels reduction projects that any additional burdens or requirements which Federal agencies would need to satisfy to conduct those projects is unwarranted, and likely only to exacerbate the wildfires and the impacts of those wildfires on our communities.

Similarly, but even more egregious, will be the impact on the Federal agencies attempting to conduct fuels reduction projects on the public lands which are proposed to be designated as wilderness pursuant to SB 1262. In those areas, under SB 1262, the Federal agencies will only be authorized to conduct projects related

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to the control of fire in compliance with 16 U.S.C. 1131(d)(1); and there is no authorization under the provisions of SB 1262 or the Wilderness Act for conducting fuels reductions projects in those areas. As such, these public lands, if designated as wilderness, are likely to add to the issues impacting Southern Oregon related to wildfires. As an additional comment, we believe that the reference to 16 U.S.C. 1131(d)(1) in Section 4(b)(3) of SB 1262 should likely be a reference to 16 U.S.C. 1133(d)(1) instead as there is no 16 U.S.C. 1131(d)(1), and 16 U.S.C. 1133(d)(1) is the provision authorizing actions to control fire on lands designated as wilderness.

Finally, we strongly recommend that any lands currently designated as O&C Lands, which will have that designation changed as a result of SB 1262 to either recreation lands or wilderness lands, be replaced with an equal amount of acreage of public domain lands being designated as O&C Lands. Despite the significant reduction in harvest being conducted on O&C Lands, which are supposed to be managed for sustained-yield harvests, the harvests on O&C Lands remain a crucial source of revenue for the O&C counties. A similar provision for the reclassification of public domain lands as O&C Lands, after existing O&C Lands were designated as something else, was recently included in the Western Oregon Tribal Fairness Act (PL 115-103).

Again, thank you for the opportunity to provide comments on our concerns with the current provisions of SB 1262.

Sincerely,

JACKSON COUNTY BOARD OF COMMISSIONERS



Bob Strosser, Chair



Colleen Roberts, Commissioner



Rick Dyer, Commissioner

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