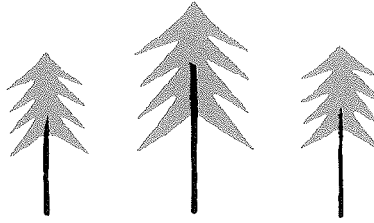


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June 11, 2015

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Senator Jeff Merkley
313 Hart Senate Office Bldg.
Washington, DC 20510

Representative Peter DeFazio
2134 Rayburn Office Bldg.
Washington, DC 20515

Representative Greg Walden
2185 Rayburn House Office Bldg.
Washington, DC 20515

Representative Kurt Schrader
2431 Rayburn House Office Bldg.
Washington, DC 20515

Re: Simplified Framework for an O&C Lands Solution

Dear Senators and Congressmen:

We very much appreciate the attention that each of you has given to O&C land issues over the last several years. While the effort to reach a consensus on proposed legislation has not yet been successful, we know that you are all committed to continue the effort. For Counties and communities in the O&C region, your continued attention to the O&C management issue is a ray of hope in contrast to an otherwise depressing federal-forest imbroglio.

Enclosed for your consideration is our proposal for O&C legislation. It is in outline form and titled "Simplified Framework for O&C Management Legislation". This Framework adopts many of the concepts from Senator Wyden's past proposals, as well as key principles reflected in the bill previously sponsored by Congressman DeFazio, Walden and Schrader. It provides the necessary certainty, and avoids some issues that in previous proposals were found to be politically difficult. The Framework also takes advantage of work that has already been done in the current BLM planning process. The proposed legislation would require some modifications to the alternatives now under consideration by the BLM, but the existing planning work already offers most of what this Framework calls for.

Kevin Q. Davis
June 11, 2015
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We hope this Framework triggers interest by you and discussion between your offices and the Counties. We will be following up with your staffs to discuss the proposal and how we might be of service converting the Framework to bill language that can be introduced this summer.

Thank you again for your past help and your commitment to solving O&C land management issues.

Very truly yours,



Tony Hyde, President



Faye Stewart, Vice President



Simon Hare, Treasurer

cc: All Association Member Counties



SIMPLIFIED FRAMEWORK FOR O&C MANAGEMENT LEGISLATION

1. Direct BLM to implement an alternative from the planning process that has projected total harvest levels (sustainable plus thinning) of at least 450 mmbf for a 20-year period, with harvest volumes distributed geographically in proportion to the sustained yield capacity of the "moist" and "dry" forest regions. Mandate harvest levels not less than 90 percent of projected for the plan, averaged over rolling 5-year periods. The mandated minimum would be required for 20 years notwithstanding any other provisions of law.
2. Do not repeal the O&C Act, but to the extent it conflicts with the adopted plan, suspend its application for 20 years.
3. All alternatives in the BLM planning process already have wilderness, W&S and ACEC areas protected by management restrictions for the life of the plans, so they need no separate designation by Congress.
4. At the end of 20 years, the legislation (and plan) sunsets.
5. Permit plan revisions during the life of the plan, so long as the harvest level does not drop below 90 percent nor increase to more than 110 percent of the starting plan projected level as a result of the revisions. Testing for the minimum and maximum continues to be done as an average over rolling 5-year periods.
6. Have plan level ESA consultation at the start but not project level consultation, so long as projects do not substantially and materially deviate from the plan. The purpose of consultation would be to provide guidance on plan implementation and mitigation of impacts, but it could not result in harvest levels below the mandated minimum. Allow for re-initiation of consultation only if there are major plan revisions, or if a new species is listed.
7. Have one round of litigation over the plan at the outset, and again over any major plan revisions, but no litigation over individual projects unless those projects depart substantially and materially from the original or revised plan.
8. Permanently bring the PD lands under the O&C Act revenue distribution formula. (They will already be included in the starting 20-year management plan).
9. Facilitate selected controverted land transfers by the FS to the BLM to permanently consolidate O&C lands in one agency. Have a separate planning process deal with the transferred lands once the transfer process is complete, and treat the planning as a major plan revision (see paragraphs 5, 6 and 7 above.)