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Sent: Thursday, April 16, 2009 8:49 PM
To: Stockade Block
Subject: Comments on Draft Area Management Plan

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Oregon Department of State Lands
Attn: Stockade Block Plan Comments
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Thank you for the opportunity to attend the public hearing concerning the Stockade Block planning on April 2, 2009. The meeting was conducted very well and provided a good source of information as well as an opportunity to comment on the planning efforts which are underway for the Stockade Block managed by the Oregon State Department of State Lands.

The Black Bull Spring Ranch is located in Malheur County, Oregon along the west side of Barren Valley and the Duck Creek Lakebed. The original homestead is dated as being issued on February 27, 1901 to Lewis L. Seward. The homestead included 160 acres in Township 28 South, Range 37 East, Sections 34 E ½ NE1/4 and 35 W ½ NW ¼ Willamette Meridian. The Black Bull Spring Ranch is one of the private land in-holdings which exist within the Stockade Block. As the owner of Black Bull Spring Ranch I have prepared the following comments on your Draft Stockade Block Area Management Plan dated March/April 2009:

1. General Comment: Over-all the draft management plan appears to be sound and should meet the needs of the State of Oregon to articulate a sustainable management strategy for enhancing the environment and financial return to the Common School Fund.
2. Western Juniper Woodland: The positive efforts to control the western juniper woodlands should include provisions for private fire wood cutting and if demand allows commercial fire wood cutting permits. Modest fees could be used to offset the administrative costs for management of the permits and could possibly reduce the costs associated with current efforts to control the western juniper woodlands. We should note that public demand for fire wood will vary with the overall economic conditions in the State of Oregon.
3. Western Juniper Woodland: Even though the lack of wildfire has possibly contributed the increase in western juniper woodlands over the historic or pre fire suppression conditions, the plan should clearly state that wildfire suppression will continue. The plan should also clearly state that there will be no "let burn" areas within the Stockade Block.
4. Wild Horses: The plan should clearly state that the Stockade Block does not currently support wild horses, that not forage has been allocated for wild horse use, and that wild horses that trespass on the Stockade Block will be moved back to the wild horse management areas under the oversight of the BLM,
5. Recreation Use: While recreation use should continue at the current level in the Stockade Block, the plan should not propose any facilities to increase recreation use which may degrade the financial return to the Common School Fund or adversely affect the livestock operations on the Stockade Block.
6. Recreation Use: Exclusive use recreation permits should be clearly excluded from the management plan. Non-exclusive permits for recreation guiding services should be included in the plan for use of the Stockade Block greater than 14 days, or groups of more than 10 individuals for any stay, or more than 5 horses in any one party or group regardless of the number of days.
7. Recreation Use: Exclusive permits should be addressed for very limited areas (less than 1 acre) for temporary facilities such as tent camps, horse corals, or cooking fire pits as long as they do not restrict or limit the access of others and do not interfere with wildlife or livestock movement, grazing, or watering.
8. Recreation Use: Recreational horse use must not change the forage available for

livestock authorized by leases, or that allocated to wildlife use. If recreation horse use would change the forage available permits should be issued (sold) and lost revenue restored to both the Common School Fund and the livestock lessee.

9. Recreation Use: The off-road vehicle use should be monitored by the Oregon State Department of Land employees as well as the lease holders. If resource damage is noted more positive efforts may be needed to insure sustained revenue over the long term by restricting off-road vehicle to existing roads and trails.

10. In-Holdings: The plan should be amended to clearly state that the Oregon State Land Board respects the concept of private land ownership and recognizes the contributions private land ownership has made to the State of Oregon and the management of the Stockade Block. Without private lands there would be no livestock operations to lease the grazing forage and the financial return to the Common School Fund would be reduced. Your note that "the plan affects only land management actions regarding Department of State Land owned and managed lands in and adjacent to the Stockade Block and in no way imposes requirements on lands not owned by Department of State Lands" is a good approach which should be applied throughout the document.

11. In-Holdings: Purchase or exchange of the private "in-holdings" should not be considered by the State of Oregon as such action would reduce the tax revenue to the counties and result in greater state costs for maintenance of the limited infrastructure currently maintained by county property tax revenues. Future economic development opportunities on the private in-holdings may also provide a basis for increasing the revenue return on the Stockade Block.

12. In-Holdings: When the Oregon State Land Board or the private owners identify specific opportunity to increase the income generating potential of the State Lands or the private in-holding the Oregon State Land Board should pursue: cooperative management efforts; leasing private land in order to increase financial return for the adjoining state land; leases of water to increase appropriate use of the state lands; or right-away easements to improve access to the state lands when necessary for financial return.

13. In-Holdings/Access (Roads, Tracks and Trails): There are some unimproved road ways across state land which have historical provided, and continue to provide, vehicle access to private in-holdings. The management plan should clearly state that routes of historic vehicle access will remain open and are not subject to right-of-way requirement for use or maintenance. Of course any new vehicle routes or extensive upgrading of the unimproved roads should be addressed by specific right-of-way procedures.

14. In-Holdings: Continue to include the private land owners in the management process and in the decision making for both general and specific uses and practices on the adjoining state land.

15. Agricultural Development: In some cases the area of state land which would be needed to have conversion from rangeland into agriculture land to make a private effort cost effective would be limited to the design of the irrigation system.

16. Noxious Weed Abatement: Abatement efforts for noxious weeds should include cooperative efforts with the private land owners to address the treatment of each isolated patch and not just that on state land.

17. Global Climate Change: A good management plan does not need to reference short sighted fads or misguided concepts to justify sound management practices. Drop the reference to global climate change wording and stay with the sound sustainability concepts which provide for long term stability of the resources and increase the long term financial return associated with the use of the Stockade Block lands. We all know that local and regional climates vary over time and management direction and specific use may need to adapt to either increases or decreases in moisture and/or temperature. Thank you for the opportunity to review and comment on your planning effort. I look forward to receiving the final plan.

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