"Looney, Christopher" <Christopher.Looney@macerich.com>
06/22/2011 05:32 PM
To: <OR_Eugene_Mail@blm.gov>
cc:
Subject: West Eugene Wetlands

To whom it may concern,

As a West Eugene homeowner whose property borders the West Eugene Wetlands, I am especially concerned about this incredible natural resource
and it’s future. Specifically, I writing to you regarding a part of the wetland that I do not believe is owned or protected by the BLM, and I think this is unfortunate.

The specific area I am talking about is a swath of land on the north side of the Fern Ridge bike path, directly west of the roundabout at Roosevelt and North Terry streets. This piece of wetland is quite literally in my backyard, and I can attest to the many species of ducks, quail, pheasant, snakes, turtles, and other wildlife that call this area home. In addition,
natural lilac grows in this area, which turns into a pond during the wetter months. I do not believe this area is protected, as just a couple of years ago the City of Eugene came in and installed the Legacy Interceptor sewer line system through here. They completely devastated this area, and it has only since recovered. However, because this area sits below the bike path, it offers shelter and protection to ducks who make their nests here (we have photos of baby ducks nesting right behind our home) and to many other species. I am afraid that as West Eugene continues to grow, the city will think it’s a good idea to extend Roosevelt Blvd through this area and connect it to Greenhill Road. Not only is this unnecessary from a traffic standpoint, it would destroy an important part of the wetland ecosystem.

I would highly encourage the BLM to work with whatever organizations necessary in order to protect this incredible natural resource.

Please feel free to contact me if you would like further information.

Best regards,
Chris

Christopher Looney | Business Development Manager
. . . . . .
Valley River Center & Washington Square
293 Valley River Center Dr.
Eugene, OR 97401
p. 541-683-5511
c. 541-610-2778

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Parks and Open Space

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PARKS AND OPEN SPACE PLANNING

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NATURAL RESOURCES

June 29, 2011

Richard Hardt
Planning and Environmental Coordinator
Eugene District BLM Office
3106 Pierce Parkway
Springfield OR 97477

Dear Mr. Hardt,

As a long-standing partner of the U.S. Bureau of Land Management (BLM) in Eugene, the City of Eugene Parks and Open Space Division supports BLM's effort to develop a Resource Management Plan (RMP) for the BLM-administered lands in the West Eugene Wetlands. In an effort to assist you with this effort, we offer the following comments.

1. We encourage the BLM to develop specific goals and objectives toward the recovery and restoration of rare and threatened plant species, as well as the plant communities in which those species occur, including wetland prairie, upland prairie, and oak savanna plant communities. All these plant communities are critically threatened throughout the Willamette Valley and have been identified in the *Oregon Conservation Strategy* (Oregon Department of Fish and Wildlife 2006) as key target habitat types for recovery. The BLM is fortunate to own significant acreages of each of these three plant communities and should develop a strategy, timeline, and funding plan to effectively restore them.

2. We encourage the BLM to utilize the best, currently available scientific information to help restore the native plant communities BLM manages. There are many recent scientific studies published in peer-reviewed journals (e.g., Rook et al. 2011, Stanley *et al.* 2011a, Stanley *et al.* 2011b, Wold *et al.* 2011) specific to restoring wetland and upland prairies in the Willamette Valley/Puget Trough ecoregion that BLM should utilize in its RMP process. All of these studies indicate that a suite of restoration tools is needed to successfully restore desired plant community composition. One specific tool that is repeatedly demonstrated as having utility in restoring desired native plant communities is the prudent and strategic use of appropriate herbicides. Numerous studies (e.g., Rook et al. 2011, Stanley *et al.* 2011a, Stanley *et al.* 2011b, Wold *et al.* 2011) demonstrate that the use of herbicides, when used in combination with other restoration tools (e.g., controlled ecological burning and seeding with native species), can greatly improve the likelihood of achieving restoration goals. In addition, use of certain herbicides has been demonstrated by scientific research in the West Eugene Wetlands to not have negative impacts on many soil functional attributes (Pfeifer-Meister 2008). It is unlikely that the BLM will be able to accomplish its endangered

species recovery goals or plant community recovery goals without the prudent and strategic use of specific herbicides.

3. All restoration and enhancement efforts in West Eugene have benefited from the participation of the BLM in the Rivers to Ridges Partnership's plant materials program. Dedicated funding toward the program has fluctuated significantly from year to year with impacts on the long term stability of the program. We encourage the BLM to develop specific goals related to plant materials and to solicit stable ongoing funding to ensure the plant materials program continues to thrive. Having a diversity of species available, and an abundance of seed available, has been demonstrated by many scientific studies as being necessary for successful restoration of prairie plant communities (see Wold *et al.* 2011 and references therein).

4. The BLM has historically been the lead agency for controlled ecological burns in the West Eugene Wetlands. We encourage the BLM to continue to support controlled ecological burns in the West Eugene Wetlands, as these types of burns are an important component of the prairie restoration toolkit.

5. We encourage the BLM to develop specific policies and funding mechanisms dedicated to strategically and sustainably addressing illegal camping issues on BLM lands in west Eugene.

6. With Land and Water Conservation funding, the BLM has successfully protected hundreds of acres of wetland and upland habitat in West Eugene, successfully meeting the goals of the West Eugene Wetlands Plan. With most of goals in the West Eugene Wetlands Plan met, BLM acquisition ceased. We encourage the BLM to consider developing a new acquisition strategy targeted at completing an ecologically significant wildlife corridor and wetland complex to facilitate recovery of threatened species and habitats as well as to buffer against anticipated climate change impacts.

7. Climate change impacts and adaptation strategies should be explicitly included in the RMP. This would include development of important research questions needed to develop such strategies.

8. The BLM's Schedule Environmental Assessment (EA) has been a valuable planning tool to guide BLM land management over recent years. Similarly, significant staff and partner resources went into the development of the Schedule EA. Will the EA and goals outlined therein be integrated into the RMP process?

9. We encourage the RMP to identify passive recreation goals in the West Eugene Wetlands, including those identified in the *Rivers to Ridges Vision and Action Plan*.

The Parks and Open Space Division appreciates the opportunity to provide input into the BLM's RMP process. We are happy to provide additional technical support as

appropriate. We very much look forward to the outcomes of this work and to continuing our collective efforts to protect, conserve, and restore the valuable species and habitats in west Eugene.

Sincerely,

Eric Wold
Natural Resources Section Manager
Certified *Ecologist* by the Ecological Society of America

Literature Cited

Pfeifer-Meister, L. 2008. Community and ecosystem dynamic in restored and remnant prairies. Ph. D. Dissertation, University of Oregon, Eugene.

Rook, E.J., D.G. Fischer, R.D. Seyforth, J.L. Kirsch, and C.J. LeRoy. 2011. Responses of prairie vegetation to fire, herbicide, and invasive species legacy. Northwest Science 85:288-302.

Oregon Department of Fish and Wildlife. 2006. The Oregon Conservation Strategy. Oregon Department of Fish and Wildlife, Salem, Oregon.

Stanley, A.G., P.W. Dunwiddie, and T.N. Kaye. 2011a. Restoring invaded Pacific Northwest prairies: management recommendations from a region-wide experiment. Northwest Science 85:233-246.

Stanley, A.G., T.N. Kaye, and P.W. Dunwiddie. 2011b. Multiple treatment combinations and seed addition increase abundance and diversity of native plants in Pacific Northwest prairies. Ecological Restoration 29:35-44.

Wold, E.N., J.E. Jancaitis, T.H. Taylor, and D.M. Steeck. 2011. Restoration of agricultural fields to diverse wet prairie plant communities in the Willamette Valley, Oregon. Northwest Science 85:269-287.

From: Doug Heiken <dh@oregonwild.org>
To: BLM_OR_EU_Mail@blm.gov, OR_Eugene_Mail@blm.gov
Date: Fri, 1 Jul 2011 17:10:26 -0600
Subject: West Eugene Wetlands RMP - scoping comments
FROM: Doug Heiken, Oregon Wild | PO Box 11648, Eugene, OR 97440 | 541-344-0675 | dh@oregonwild.org
TO: Eugene BLM
ATTN: Richard Hardt, Ginny Grilley
DATE: 1 July 2011
RE: West Eugene Wetlands RMP - scoping comments

Please accept the following scoping comments from Oregon Wild regarding the proposed West Eugene Wetlands RMP.

Oregon Wild would like to remain on the list for notices related to the West Eugene Wetlands RMP EIS.

Oregon Wild hopes that the West Eugene Wetland Plan will focus on ecological restoration and low impact recreation and environmental education.

We do not want to talk you out of doing an EIS, but it seems incongruous to see an EIS for a 1,340 acre RMP which is unlikely to be controversial, while doing just an EA for a commercial logging project affecting 8000+ acres of forest and 30+ miles of roads (e.g., Long Tom EA).

_____

Doug Heiken, Oregon Wild
PO Box 11648, Eugene OR 97440
dh@oregonwild.org, 541.344.0675

From: Bob Zybach <ZybachB@NWMapsCo.com>
Date: July 3, 2011 02:22:13 PM PDT
To: Richard Hardt <OR_Eugene_Mail@blm.gov>
Subject: West Eugene Wetlands RMP: "public scoping" response

Dear Mr. Hardt:

This email is in response to the Federal Register, Volume 76 Issue 110 (Wednesday, June 8, 2011) notification regarding public responses to the proposed West Eugene Wetlands RMP. i would like to a) be involved in all future communications on this project, and b) have BLM consider the following points:

1) Planning should involve Oregon Tribal leadership in substantive roles.

2) A primary focus of prairie restoration and management should be the production, harvesting, and use of native food and fiber plants by Oregon Tribal members and local school students; including hazel, camas, tarweed,
wapato, oak, iris, fawn lilies, cat's ears, and berries.

3) Restoration and maintenance of the wetlands should involve the uses of traditional fire, harvesting, and pruning practices, rather than herbicides or counterproductive mechanical methods, such as mastication of
native plants.

4) The planning process should also involve specialists in the fields of cultural anthropology, ethnobotany, historical ecology, and landscape architecture, in addition to those listed.

Thank you for considering these requests.

Sincerely,

Bob Zybach, PhD.
Cottage Grove
541-767-3087

david moen <columbiacondor@gmail.com>
07/04/2011 04:29 PM
To: BLM_OR_EU_Mail@blm.gov
cc:
Subject: West Eugene Wetland public comment

Dear Richard Hardt and the Planning and Environmental staff,

I am writing regarding BLM's developing an "RMP" that can open the door to
the use of herbicides in the "restoration" of native food and fiber plants
and the resumed mechanical shredding of such "weed" species as ancient
clumps of hazel at the West Eugene Wetland restoration area. Please
consider these priorities in your approach:

1) Planning should involve Oregon Tribal leadership in substantive roles.

2) A primary focus of prairie restoration and management should be the
production, harvesting, and use of native food and fiber plants by Oregon
Tribal members and local school students; including hazel, camas, tarweed,
wapato, oak, iris, fawn lilies, and berries.

3) Restoration and maintenance of the wetlands should involve the uses of
traditional fire, harvesting, and pruning practices, rather than
herbicides or counterproductive mechanical methods, such as mastication of
native plants.

4) The planning process should also involve specialists in the fields of
cultural anthropology, ethnobotany, historical ecology, and landscape
architecture, in addition to those listed.

Sincerley, David Moen
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Ever wonder how you can help Condors?
http://www.nps.gov/pinn/naturescience/howtohelpcondors.htm

<>--<>-<>--<>-<>--<>-<>--<>-<>--<>
David Moen, M.S.
Condor Research N.W.
Field cell # (503) 954-4772

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Ever wonder how you can help Condors?
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<>--<>-<>--<>-<>--<>-<>--<>-<>--<>
David Moen, M.S.
Condor Research N.W.
Field cell # (503) 954-4772

July 5, 2011

To: Richard Hardt, Planning and Environmental Coordinator
From: Dr. Eric Jones
Re: West Eugene Wetlands RMP comments

The following comments are provided in response to the request for public input to aid in the development of a Resource Management Plan (RMP) to provide overall management direction on the West Eugene Wetlands (see Scoping file: http://www.blm.gov/or/districts/eugene/plans/files/1610WEW_Scoping.pdf)

As a senior scientist with the Institute for Culture and Ecology (IFCAE) I have conducted basic and applied research on sustainable natural resource and environmental management and policy through the United States, including the West Eugene Wetlands where I served as Project Director for the Ethnobotany Resource Area Project from 2007-2009 (http://www.ifcae.org/projects/wewera/). I have studied recreational, subsistence and commercial aspects of ethnobotanical use including wild and cultivated species in all major ecosystems in the United States. I'm considered by my colleagues as an expert on nontimber forest products having published extensively on sociocultural and ecological aspects, including serving as lead planner and editor of the University Press of Kansas book, "Nontimber Forest Products in the United States."

Comments

1) Tribal government leaders should be sent invitations asking them to participate substantively in all planning processes at the West Eugene Wetlands, including the development of this Resource Management Plan. The West Eugene Wetlands occur in an area that archaeological evidence shows was occupied and managed by Native American Indians for 11,000 years prior to the arrival by EuroAmerican settlers. The West Eugene Wetlands area has some of the most significant and oldest archaeological sites found in North America yet the BLM has conducted very little archaeology before conducting or sanctioning disturbance related activities. In a planned mastication of hazel trees at the Hansen unit a Ph.D. archaeologists was not brought in to evaluate the site, despite arguments from Indian elders and other experts to the site indicating that the hazel tree ecology may have been from pre-European anthropogenic activity. The BLM Field Manager was perceived by the visiting stakeholders as well as representatives from the West Eugene Wetlands Partnership such as the City of Eugene as being hostile to those that opposed his orders for mastication.

2) Herbicide spraying will likely have an adverse impact on minorities and economically disadvantaged populations and thus is subject to Executive Order 12898 on environmental justice. The current EIS draft does not include an environmental justice analysis, and such an analysis needs to be included in the final EIS. That environmental justice analysis must include a discussion of the mitigation measures that will need to be implemented to address any adverse impacts on minorities or economically disadvantaged populations.

3) Since the BLM became involved in the West Eugene Wetlands the senior managers have never sufficiently engaged the regional tribes (e.g., Confederated Tribes of the Grand Ronde,

Confederated Tribes of the Siletz) in management planning processes as required under NEPA. An exception to this lack of outreach to regional tribes were the efforts by the BLM Project Manager for the Wetlands at the time, Pat Johnston. Johnston facilitated the creation of the West Eugene Wetlands Ethnobotany Resource Area project but told her superiors that such efforts should not be seen as a substitute for federal obligations to reach out to tribal governments. The West Eugene Wetlands Ethnobotany Resource Area Project Final Report dated September 01, 2010 documents this deficiency as well as a variety of other problems directly relative to the current Resource Management Plan development discussions. Thus the report is hereby formally included as a part of my comments.

4) A major aspect of all restoration and management at the West Eugene Wetlands should consider and potentially focus on the production, harvesting, and use of native food and fiber plants by Oregon Tribal members and other public stakeholder groups. Such plants includes camas, hazelnut, tarweed, willow, ash, wapato, oak, iris, fawn lilies, berries and a multitude of plants used for medicinal purposes. Restoration and management for these culturally important species should involve regional Native American tribal representatives and experts in the use of traditional fire, harvesting, and pruning practices, rather than herbicides or counterproductive mechanical methods, such as mastication of native plants.

5) Herbicides and pesticides should not be used at the West Eugene Wetlands, including the use of native plants and seeds purchased for restoration projects that were raised in nurseries and farms using herbicides and pesticides currently unhallowed at the West Eugene Wetlands.

6) The planning process should also involve specialists in the fields of cultural anthropology, ethnobotany, historical ecology, and landscape architecture, in addition to those listed.

Please keep me informed of the steps that you take on these issues and any opportunities to participate further in the process.

Eric T Jones, Ph.D.

Senior Scientist/Ecological Anthropologist
Institute for Culture and Ecology (501c3)
Post Office Box 6688
Portland, Oregon 97228-6688. USA
Telephone: 541-505-1870
E-Mail: eric.t.jones@ifcae.org
Website: www.ifcae.org

Courtesy Faculty: OSU Anthropology
Senior Research Associate: UO Anthropology
Adjunct Professor: PSU Environmental Science and Management

Devon Bonady <dbonady@uoregon.edu>
07/06/2011 12:50 PM
To: BLM_OR_EU_Mail@blm.gov
cc:
Subject: RMP for West Eugene Wetlands Planning Area, public comments

To Richard Hardt:

Dear Sir,

I am writing to you, the BLM Planning and Environmental Coordinator, with my comments in regards to the proposal to develop a Resource Management Plan for the West Eugene Wetlands Planning Area in Eugene, Oregon.

I'd like to express my support for the prairie restoration project on that site which incorporated plants used for food and fiber. I think that a primary focus of prairie restoration and management should be the production, harvesting, and use of native food and fiber plants by Oregon Tribal members and local school students; including hazel, camas, tarweed, wapato, oak, iris, fawn lilies, and berries.

Restoration and maintenance of the wetlands should involve the uses of traditional fire, harvesting, and pruning practices, rather than herbicides or counterproductive mechanical methods, such as mastication of native plants, particularly when these plants are used for food and craft by children and others.

Planning for such restoration, or any restoration, should involve Oregon Tribal leadership in substantive roles.
The planning process should involve specialists in the fields of cultural anthropology, ethnobotany, historical ecology, and landscape architecture.

Please contact me if you have any questions or replies.
Thank you for your consideration,

--
Devon Bonady
Masters Candidate
Environmental Studies Program
University of Oregon

Richard Hardt, RMP Team Leader

Telephone record: Alison Center, North American Butterfly Association

July 7, 2011

I received a phone call today from Alison Center with the North American Butterfly Association about the West Eugene Wetlands RMP. She told me that the association has butterfly survey data from the TNC parcels in the West Eugene Wetlands and butterfly species lists from BLM-administered lands in the West Eugene Wetlands. She asked if we are interested in that data. I told her that we are interested and to send it to me. We discussed the need for a resource management plan for the West Eugene Wetlands and the relationship of the proposed RMP to the WEW Schedule EA. I explained that we need an RMP to provide a comprehensive guide to management and a strategic approach. I explained that our plan will be consistent with the US Fish and Wildlife Service recovery plan.

The Nature Conservancy
Protecting nature. Preserving life.™

The Nature Conservancy in Oregon
821 SE 14th Avenue
Portland, OR 97214-2537

tel 503 802-8100
fax 503 802-8199
nature.org/oregon

July 8, 2011

Richard Hardt
Planning and Environmental Coordinator
Eugene District BLM Office
3106 Pierce Parkway
Springfield OR 97477

Dear Mr. Hardt,

As a long-standing partner of the U.S. Bureau of Land Management (BLM) in Eugene, The Nature Conservancy supports BLM's effort to develop a Resource Management Plan (RMP) for the BLM-administered lands in the West Eugene Wetlands. In an effort to assist you with this effort, we offer the following comments.

1. We encourage the BLM to develop specific goals and objectives toward the recovery and restoration of rare and threatened plant species, as well as the plant communities in which those species occur, including wetland prairie, upland prairie, and oak savanna plant communities. All these plant communities are critically threatened throughout the Willamette Valley and have been identified in the *Oregon Conservation Strategy* (Oregon Department of Fish and Wildlife 2006) as key target habitat types for recovery. The BLM is fortunate to own significant acreages of each of these three plant communities and should develop a strategy, timeline, and funding plan to effectively restore them.

2. BLM is just one of the land managers within the Eugene West Recovery Zone working to manage and restore habitats for listed prairie species. BLM's analysis should incorporate the contribution of other partners' recovery efforts into your analysis of BLM's role in recovery, both in terms of extent and location of recovery efforts. Toward this end, BLM's analysis should be based, at least in part, on the recovery planning that the partners have recently completed through a National Fish and Wildlife Foundation grant to the City of Eugene. It is important to note that the partners have identified different (largely higher) quantitative population goals for listed species in west Eugene. While these local recovery goals do not have any legal status, they do represent our collaborative efforts to create a vision for restoration and management of listed species on partnership lands.

3. We encourage the BLM to utilize the best, currently available scientific information to help restore the native plant communities BLM manages. There are many recent scientific studies published in peer-reviewed journals (e.g., Rook et al. 2011, Stanley *et al.* 2011a, Stanley *et al.* 2011b, Wold *et al.* 2011) specific to restoring wetland and upland prairies in the Willamette Valley/Puget Trough ecoregion that BLM should utilize in its RMP process. All of these studies indicate that a suite of restoration tools is needed to successfully restore desired plant community composition. One specific tool that is repeatedly demonstrated as having utility in restoring desired native plant communities is the prudent and strategic use of appropriate

herbicides. Numerous studies (e.g., Rook et al. 2011, Stanley *et al.* 2011a, Stanley *et al.* 2011b, Wold *et al.* 2011) demonstrate that the use of herbicides, when used in combination with other restoration tools (e.g., controlled ecological burning and seeding with native species), can greatly improve the likelihood of achieving restoration goals. In addition, use of certain herbicides has been demonstrated by scientific research in the West Eugene Wetlands to not have negative impacts on many soil functional attributes (Pfeifer-Meister 2008). It is unlikely that the BLM will be able to accomplish its endangered species recovery goals or plant community recovery goals without the prudent and strategic use of specific herbicides.

4. All restoration and enhancement efforts in West Eugene have benefited from the participation of the BLM in the Rivers to Ridges Partnership's plant materials program. Dedicated funding toward the program has fluctuated significantly from year to year with impacts on the long term stability of the program. We encourage the BLM to develop specific goals related to plant materials and to solicit stable ongoing funding to ensure the plant materials program continues to thrive. Having a diversity of species available, and an abundance of seed available, has been demonstrated by many scientific studies as being necessary for successful restoration of prairie plant communities (see Wold *et al.* 2011 and references therein).

5. The BLM has historically been the lead agency for controlled ecological burns in the West Eugene Wetlands. We encourage the BLM to continue to support controlled ecological burns in the West Eugene Wetlands, as these types of burns are an important component of the prairie restoration toolkit.

6. We encourage the BLM to develop specific policies and funding mechanisms dedicated to strategically and sustainably addressing illegal camping issues on BLM lands in west Eugene.

7. With Land and Water Conservation funding, the BLM has successfully protected hundreds of acres of wetland and upland habitat in West Eugene, successfully meeting the goals of the West Eugene Wetlands Plan. With most of goals in the West Eugene Wetlands Plan met, BLM acquisition ceased. We encourage the BLM to consider developing a new acquisition strategy targeted at completing an ecologically significant wildlife corridor and wetland complex to facilitate recovery of threatened species and habitats as well as to buffer against anticipated climate change impacts.

8. Climate change impacts and adaptation strategies should be explicitly included in the RMP. This would include development of important research questions needed to develop such strategies.

9. The BLM's Schedule Environmental Assessment (EA) has been a valuable planning tool to guide BLM land management over recent years. Similarly, significant staff and partner resources went into the development of the Schedule EA. Will the EA and goals outlined therein be integrated into the RMP process?

10. We encourage the RMP to identify passive recreation goals in the West Eugene Wetlands, including those identified in the *Rivers to Ridges Vision and Action Plan*.

The Nature Conservancy appreciates the opportunity to provide input into the BLM's RMP process. We are happy to provide additional technical support as appropriate. We very much look forward to the outcomes of this work and to continuing our collective efforts to protect, conserve, and restore the valuable species and habitats in west Eugene.

Sincerely,

Dan Bell
Willamette Basin Conservation Director

Literature Cited

Oregon Department of Fish and Wildlife. 2006. The Oregon Conservation Strategy. Oregon Department of Fish and Wildlife, Salem, Oregon.

Pfeifer-Meister, L. 2008. Community and ecosystem dynamic in restored and remnant prairies. Ph. D. Dissertation, University of Oregon, Eugene.

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Stanley, A.G., P.W. Dunwiddie, and T.N. Kaye. 2011a. Restoring invaded Pacific Northwest prairies: management recommendations from a region-wide experiment. Northwest Science 85:233-246.

Stanley, A.G., T.N. Kaye, and P.W. Dunwiddie. 2011b. Multiple treatment combinations and seed addition increase abundance and diversity of native plants in Pacific Northwest prairies. Ecological Restoration 29:35-44.

Wold, E.N., J.E. Jancaitis, T.H. Taylor, and D.M. Steeck. 2011. Restoration of agricultural fields to diverse wet prairie plant communities in the Willamette Valley, Oregon. Northwest Science 85:269-287.

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Fiscal/Operations
Amanda Wilson &
Rob Hoshaw
(541) 338-7060

751 S. Danebo
Eugene, OR 97402
Fax 541-338-7062

www.longtom.org

July 7, 2011

Richard Hardt
Planning & Environmental Coordinator
Bureau of Land Management Eugene District Office
3106 Pierce Parkway, Suite E
Springfield, Oregon 97477
OR_Eugene_Mail@blm.gov

RE: **West Eugene Wetlands Resource Management Plan (Wetlands RMP)**

Dear Mr. Hardt;

The Long Tom Watershed Council would like to take this opportunity to help identify issues and possible solutions for the Wetlands RMP process. The Long Tom Watershed Council has enjoyed a long partnership with the Eugene District BLM. Together we have worked to improve watershed health through citizen education and restoration projects that improve water quality and fish & wildlife habitat within the Long Tom River watershed. Over the course of 14 years the BLM-LTWC partnership has made it possible for LTWC to work with over 1,500 volunteers, 1,400 families, 120 local contractors and 75 community to educate and implementing more than 50 restoration projects.

We have a few comments in regard to the preliminary issues BLM staff identified in your comment solicitation letter.

1. Consider a protected designation for the West Eugene Wetlands to reflect its status in containing key threatened habitats such as wetland and wet prairie. The LTWC includes these habitats in its Conservation Strategy and has completed many restoration and enhancement projects in the surrounding area that contribute to the populations of fish and wildlife these habitats support. This may help establish the area as a more specific program. Possible designations could include Area of Critical Environmental Concern (ACEC) due to the presence of threatened and endangered species, or Outstanding Natural Area (ONA) as it is consistent with the current uses of education, scenic, recreation and scientific use.

2. The current wetlands facility is a much-used and much-loved resource by the community. It is the hub for the scientific and layperson public as they interface with BLM and key partners, and as the local management post for the Wetlands Partnership. These uses support significant habitat restoration, education (adult and K–12), and research. Further, the research component involves citizen volunteers in water quality monitoring, cutthroat trout migration monitoring, streamside planting

programs, private landowner education, multi-stakeholder education, discussion and decision-making, and other citizen science programs. We recommend BLM incorporate recognition for, and continued use of, this vital infrastructure component in the RMP in order to manage and maintain the wetlands facility for the purpose of habitat restoration, T&E species protection and enhancement, and the established uses in education, recreation, and tribal use of plant collection, including the safe use of the building by public and partners.

3. Consider allowing judicious and limited use (e.g. application methods, timing) of aquatic-label herbicides for habitat restoration purposes in natural areas that have conservation goals or listed plant species, especially for the control of noxious weeks and invasive plants. Please note the Long Tom Watershed Council is now testing for pesticides in Amazon Creek as part of the DEQ's Pesticide Stewardship Partnership and will be able to share monitoring data annually for at least 3 years starting approximately January, 2012.

4. In considering any action regarding the Long Tom ACEC, we would just point out that we have significant private land restoration sites for complementary habitat adjacent to or surrounding that ACEC. Any actions that would decrease the long term habitat conditions of the prairie and wetland on the ACEC site would be counterproductive to the habitat goals and values of the surrounding area.

The Council would like thank the BLM for the opportunity to express these comments. We look forward to our continued work together in private-public partnership to improve watershed health in the Long Tom River basin.

Sincerely,

Jim Pendergrass
Chair

Dana Dedrick
Watershed Coordinator & Executive Director

WHITMAN COLLEGE

Mr. Richard Hardt
Planning and Environmental Coordinator
Bureau of Land Management
P.O. Box 10226
Eugene, Oregon 97440-2226

Dear Mr. Hardt;

I am a professor of Sociology and Environmental Studies at Whitman College in Walla Walla WA with ten years of experience working on the social and cultural impacts of environmental degradation for Native American tribes, including basketweavers in the state of California. I am writing you today with comments regarding the West Eugene Wetlands RMP/EIS. This project came to my attention in part because I am soon to join the departments of Sociology and Environmental Studies at University of Oregon. As a former resident of Eugene I am familiar with and commend you for the very positive history of relations between the BLM and Kalapuya at this site (for which I offer my congratulations). I am now concerned that proposed actions will be a divergence from positive legacy of cooperation.

As you are aware, the West Eugene Wetlands represents and important ethnobotanical site for Kalapuya people. Access to gathering sites that are free from pesticide use, as well as the ability to manage for tribal use species is a very significant struggle for tribal basketweavers today. You are probably aware that the ability of Native people to participate in cultural activities such as tending to cultural use species, harvesting them and weaving has far reaching social and cultural impacts on the lives of Native people today. Native and non-Native perspectives on many aspects of land use differ. Tribal people use different species than do non-Native people, and have specific practices to tend, care for and harvest those species. In particular in my own work it has become apparent that while many non-Native people find herbicide use to be an acceptable technique for managing invasive species, the views of all of the Native basketweavers with whom I have ever met diverge sharply on this count. Yet, despite the very significant present day cultural relevance of tribal management approaches, in almost all cases Tribes are severely disadvantaged in gaining recognition for their land use perspectives. It is for this reason that federal and state environmental justice legislation has been put in place, as well as special attention to the process of incorporating Tribes in management activities. I encourage you to fully engage in all such measures as you consider the management of the West Eugene Wetlands. Tribal cultural heritage and ecological perspectives are a vital (and imperiled) resource for all peoples, native and non-native alike.

While I have not worked directly with this project, I understand that the BLM has in the past done a very good job incorporating the needs and interests of Kalapuya in this important area. I congratulate you on this impressive achievement. It is my understanding that past BLM management activities have been carried out in such as way so as to minimize disruption to

Department of Sociology
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important cultural activities at this site (in particular the lack of herbicide use). From my own work with basketweavers in California tribes I have been impressed with both the difficulty tribal weavers face in maintaining access to gathering sites, and the very significant cultural importance of doing so. For tribal people the ability to access the land, carry out management activities and harvest cultural use species is a vital cultural activity. When they are denied the ability to carry out these cultural practices the impacts on tribal culture, as well as the self esteem and identity of young people and elders is devastating. In the face of species invasions, budget cuts and other challenges the BLM faces pressures to engage in activities that damage tribal use species or inhibit access by basketweavers such as the use of herbicides. I therefore specifically request that:

1) All proposed actions incorporate a complete accounting of all social and cultural impacts for Oregon Tribes (e.g. the Kalapuya people and any other tribes with interest in the area), including but not limited to cultural impacts of the loss of future gathering areas for tribal youth and elders.

2) All planning centrally involve Oregon Tribal leadership, as well as specialists in ethnobotany and anthropology.

3) Given the importance of the site, that tribal land uses be a primary focus of restoration and management activities (e.g. the management, production, harvesting, and use of native food and fiber plants by Oregon Tribal members). It is my understanding that species of particular concern will likely include hazel, camas, tarweed, wapato, oak, iris, fawn lilies, and berries.

4) In your ongoing efforts to restore the site that traditional tribal management methods be employed -- e.g. the use of traditional fire, traditional harvesting, and pruning practices, rather than herbicides or mechanical methods, such as mastication of native plants. The fact that this site has not received herbicide applications in the past has been important for Native elders.

I personally appreciate the important ecological work carried out by the BLM. I recognize that you and your agency must work to meet diverse public needs with increasingly limited budgets. If there are ways that my research expertise or experience can be of use to you or the agency I hope you will let me know. I look forward to working with you in the years to come.

Sincerely,

Dr. Kari Marie Norgaard
Professor of Sociology and Environmental Studies
345 Boyer Ave
Whitman College
Walla Walla WA 99362

f r i e n d s o f e u g e n e

8 July, 2011

United States Department of the Interior
Bureau of Land Management
Eugene District Office
Richard Hardt, Planning and Environmental Coordinator
Via: OR_Eugene_Mail@blm.gov

Re: mments on Scoping for the West Eugene Wetlands Resource Management Plan and Environmental Impact Statement (WEW RMP)

Dear Richard Hardt, et al.,

Thank you for the opportunity to comment on scoping considerations for the West Eugene Wetlands Resource Management Plan and Environmental Impact Statement (WEW RMP/EIS).

For purposes of standing, these comments are being offered both on behalf of Friends of Eugene, a local non-profit public interest land use, transportation, and environmental watchdog organization, as well as for myself as a private individual.

Overall, we are appreciative of the six numbered sets of preliminary planning criteria provided in the Federal Register announcement. The general thrust of our comments are intended to support these sets of criteria with some discussion around how the positive planning aspirations may be accomplished at a technical level. In addition, we offer some suggestions for additional or finer-grained considerations that we haven't found within the published preliminary list.

With regards to preliminary criteria (3):

> 3. The BLM will use a collaborative and multi-jurisdictional approach, when practical, to determine the desired future condition of public lands;

We would like to see greater clarity and a clearer commitment to collaboration and partnership in this planning process. In particular, as the words "when practical" are defined in scoping, and in action during the RMP process, it seems essential that the positive aspiration for collaborative and landscape-scale planning — so much in line with DOI and BLM policy guidance at the highest levels — be protected from the risk of diminishment based on short-term considerations, agency dynamics, or other such surmountable obstacles.

The BLM lands in the West Eugene Wetlands were acquired as part of a robust, national-award-winning partnership process. The micro-mosaic of BLM lands in West Eugene were not intended to stand on their own, but to contribute key interlocking pieces in relationship with conservation holdings of other federal agencies, local governments, and NGOs.

This is the strength and essence of partnership, and we hope the opportunity to embody joint investment of the Bureau and the community can be well and fully realized.

This will not happen by itself. Frankly, real relationships need to be built and, in some cases, rebuilt. For collaborative planning at the landscape scale to be "practical," the commitment to collaboration needs to be substantially and explicitly built into the Bureau staffing, schedule, and content expectations of the RMP process.

Practical collaboration takes a real investment. It takes both a willingness to listen (and to hear, of course), and also the ability to bring to bear specific skills in terms of public outreach, facilitation, writing and editing, and in conflict resolution — the richest kind of conflict resolution, where conflict is prevented by collaborative learning and by practical respect for the needs of all stakeholders.

For the RMP process to fulfill the intention of a collaborative approach, we recommend that project staffing, project scheduling, and project team evaluation criteria be developed that support the concrete requirements of a successful collaborative process.

Beyond, and perhaps within, the six listed preliminary planning criteria, are several more concrete areas of consideration we feel are important to address in the RMP process, and ultimately in the RMP itself.

These additional, more specific topics for land use planning in the WEW include:

a) **Landscape scale land use planning for landscape scale management.** Not the least of several reasons for this, is the complex relationship between parcel ownership and established and potential critical habitat for listed species.

b) **Partnerships in planning, that can lead to partnerships in plan implementation.** No agency can realistically expect to "go it alone" effectively in land management, especially in the current and foreseeable fiscal climate.

c) **Opportunities and positive requirements for environmental education and citizen science, including all age levels.**

d) **Opportunities and positive requirements for an appropriate range of active outdoor exploration and recreation activities.**

e) **Support for special cultural practices, such as those of First Nations peoples.** Given that the special value of certain BLM land in the West Eugene Wetlands to provide cultural resources has already been established, it would be appropriate for these values to be concretely reflected in specific planning criteria. We recommend that it should be a specific focus of the RMP to maintain and improve appropriate utilization of these cultural resources, consistent with broad ecological and management objectives.

f) **Understand and interpretation of archeological features on the lands, both in historical and living context.**

g) **Understanding the public response to the BLM, including among the metropolitan residents who make up the majority of Lane County,** and for whom the WEW are a uniquely valuable resource — a resource that is currently, and appropriately, seen as a wholistic entity, as partnership lands rather than as a mosaic of differentiated ownerships.

h) **How climate change may alter the climax and/or successional characteristics of various biomes within the WEW area,** and therefore how land management practices need to be adapted to reflect this new dimension of reality. What the needs of the WEW in terms of climate adaptation, and what is the potential for land management practices to impact net release or storage of greenhouse gases?

i) **The potential and benefits of formally withdrawing WEW lands from mining and mineral leasing eligibility.**

j) **How the RMP/EIS process will specifically make use of existing WEW plans and policies,** and how they can provide a cost-effective platform for collaborative learning inside and outside the Bureau.

k) **Ecosystem-level focus for conservation performance metrics, analysis, and evaluation.** Contemporary conservation science shows that management of habitats measured only by the success of rare, listed, charismatic, or other indicator species is consistently less effective than managing for comprehensive ecosystem values that include the stability of common species and broad habitat characteristics as well. This holds for the WEW as well.

l) **The potential for culturally-based management practices, of various types, to match or exceed appropriate performance criteria for ecosystem**

m) **The use of technically-meaningful performance metrics in evaluating alternatives.**

For example, in comparing the effectiveness of participatory and/or culturally-based practices for invasive species control, to applied-chemical or mechanical approaches, we believe sound land management planning calls for a technically-sound evaluation and comparison of the potential effectiveness, over both short and long-term planning horizons, based on alternative-neutral performance criteria, rather than assumptions around the effectiveness or side-effects of any given approach.

Where evaluation of alternatives in invasives control has been done based on neutral performance criteria in other Federal jurisdictions, the outcomes have sometimes been both surprising and positive.

We applaud the BLM Eugene District for renewing its investment in the West Eugene Wetlands, and all the diverse natural and human community values they support, with the goal of developing an excellent and broadly supported resource management plan.

No doubt the best outcomes for most who might engage with the RMP process are that the new RMP will provide an effective roadmap for nature to thrive in the West Eugene Wetlands, through a plan that draws inspiration from the challenges and opportunities represented by the very special and deep way that the nationally-renowned natural landscape of the West Eugene Wetlands is embedded in the Eugene/Springfield metropolitan community, its history, and our partnerships.

We recommend that local Bureau staff and leadership work to ensure that a full spectrum of interests are well-represented in the RMP collaborative process, and that a full range of cultural and ecological expertise, as well as collaborative process expertise (as discussed above), are represented in the Bureau technical team.

With such shared objectives in mind, we look forward to continued participation as the RMP process and content evolve.

Respectfully,

Kevin Matthews
President
Friends of Eugene
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

June 30, 2011

Richard Hardt
Planning and Environmental Coordinator
P.O. Box 10226
Eugene, Oregon 97477

Re: Scoping Comments pursuant to the Notice of Intent to Prepare an RMP/EIS for the West Eugene Planning Area (EPA Project Number 11-023-BLM)

Dear Mr. Hardt,

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Register Notice of Intent (NOI) to prepare a Resource Management Plan (RMP) for the West Eugene Wetlands Planning Area in the State of Oregon and associated Environmental Impact Statement (EIS). Our review of the NOI was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). Section 309 of the CAA specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we evaluate the document's adequacy in meeting NEPA requirements.

According to the NOI, the Bureau of Land Management (BLM) Eugene District Office intends to prepare an RMP and EIS for the West Eugene Planning Area (WEPA), which comprises 1,340 acres of acquired lands that do not have an existing RMP. The decision to undertake an RMP/EIS for the WEPA speaks to the ecological importance of the area, and to the long-standing commitment on the part of BLM to manage this area effectively.

The EPA supports the preliminary planning criteria listed in the NOI, and we applaud the stated intent to use a collaborative and multi-jurisdictional approach to determine the desired future condition of the planning area. Our limited scoping comments are focused on ensuring that the future utility of the RMP is maximized by exploring a range of management tools and options within the EIS. Of particular concern to EPA is the management of invasive species.

We anticipate that this EIS will tier to the 2007 Programmatic EIS for Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States, and the 2010 Final EIS for Vegetation Treatments Using Herbicide on BLM Lands in Oregon. We support the Integrated Vegetation Management Strategy laid out in these documents. We encourage you to develop and analyze an IVM approach specific to the WEPA within the proposed EIS. This should include an analysis of site-specific impacts associated with physical (hand pulling, mechanical removal, fire); biological; and chemical control methods. We also encourage continued recognition of the Long Tom Area of Critical Environmental Concern (ACEC), and close coordination and collaboration with local tribal interests.

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We appreciate the opportunity to provide comments at this stage of your project planning process. If you would like to discuss our comments, please contact me at (503)326-2859.

Sincerely,

/s/

Teresa Kubo
Environmental Review and Sediment Management Unit

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EPA Region 10 Detailed Comments
RMP/EIS for the West Eugene Planning Area

Integrated Vegetation Management

The current planning effort presents an opportunity to reevaluate the "tool box" available to managers on the WEPA to control and eradicate noxious weeds. As noted in our cover letter, we support BLM's integrated vegetation management approach which includes prevention; manual/mechanical; biological; fire; and chemical control methods. While we favor physical controls where practicable, we also recognize that, given the extent and nature of the invasive species within the WEPA, it may be necessary to utilize chemical controls. We also recognize the need to have a broader suite of herbicides available for use on the WEPA. The herbicides currently approved for use on the WEPA are not necessarily environmentally preferable as they are either non-selective (Glyphosate) or systemic broad –leaved herbicides (2,4-D, dicamba, and picloram). These herbicides are more likely to affect non-target vegetation. Futher, picloram should not be used in areas with a high water table (which accounts for much of the WEPA).

In order to inform the decision making process, we encourage you to develop an alternative that would adopt a broader suite of herbicides, consistent with the 2010 FEIS/ROD. Finally, we anticipate that site-specific treatment prescriptions will be based on the biology of the particular invasive plant species; site location; size of the infestation; and proximity to water among other factors. We encourage you to incorporate these decision factors into a decision key that could help managers and the public understand when, and to what extent herbicides would be used. This decision key should prioritize available control tools (mechanical/hand removal, cultural controls, herbicides, etc.) and clearly define the basis for moving from one tool to the next. Every control option has pros and cons that need to be carefully considered when deciding which control to use. Control methods can have unintended effects and result in tradeoffs that should be considered. A clear decision key would assist land managers in thinking through these tradeoffs, and could result in a more effective approach to controlling invasive species.

Long Tom ACEC

We recognize that the Long Tom ACEC is among the smallest of the ACECs managed by BLM in Western Oregon, but we encourage you to retain the ACEC designation for this area. The Long Tom ACEC is of high ecological significance because it exhibits a remnant of presettlement native plant community. We believe the Long Tom ACEC should continue to receive special management consideration so long as it can be identified as ecologically unique.

Given the scarcity of remnant prairie in good condition in the Willamette Valley, we also encourage you to use this planning effort as an opportunity to look for additional areas within the WEPA to designate as ACECs. We believe this would serve to provide additional protection for these key areas, raise public awareness of the distinct ecological niche they represent, and create contiguous corridors.

Cumulative Effects

The BLM has a long-standing and effective track record of working in partnership with other entities such as the City of Eugene and The Nature Conservancy to manage the WEPA across jurisdictional

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boundaries. We applaud this effort, as well as the stated intent within the NOI to use a collaborative and multi-jurisdictional approach to determine the desired future condition of the WEW. EPA has issued guidance on how we are to provide comments on the assessment of cumulative impacts, *Consideration of Cumulative Impacts in EPA Review of NEPA Documents*, which can be found on EPA web site at: www.epa.gov/compliance/resources/nepa.html. The guidance states that in order to assess the adequacy of the cumulative impacts assessment, five key areas should be considered. EPA assesses whether the cumulative effects' analysis:

- Identifies resources, if any, that are being cumulatively impacted.
- Determines the appropriate geographic (within natural ecological boundaries) area and the time period over which the effects have occurred and will occur.
- Looks at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern.
- Describes a benchmark or baseline.
- Includes scientifically defensible threshold levels.

Consultation with Tribes

The proposed project may affect historical or traditional cultural places of importance to the areas Tribes. The EIS needs to identify resources of cultural significance, and assure that treaty rights and privileges are addressed appropriately. If the proposed project will have impacts on Tribes, the development of the EIS should be conducted in consultation with all affected tribal governments, consistent with Executive Order (EO) 13175 (*Consultation and Coordination with Indian Tribal Governments)*. Documentation of the process used to consult with Tribes and outcomes of the consultations should be included in the EIS. Consistent with the July 28, 1999 memorandum from the CEQ to Heads of Federal Agencies, we recommend that the FS consider inviting affected Tribal governments to participate in the EIS development process as cooperating agencies. This would provide for the establishment of a mechanism for addressing intergovernmental issues throughout the EIS development process.

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DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, PORTLAND DISTRICT
WILLAMETTE VALLEY PROJECT
PO BOX 429
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REPLY TO
ATTENTION OF

26 JUL 2011

Environmental Stewardship

RECEIVED
JUL 27 2011
Bureau of Land Management
Eugene District Office

Richard Hardt
Eugene BLM
P.O. Box 10226
Eugene, Oregon 97440-2226

Dear Mr. Hardt:

We would like to offer the following discussion regarding the BLM's West Eugene Resource Management Plan scoping process. Our agencies have worked together as part of the West Eugene Wetlands (now Rivers to Ridges) for many years. Because of this partnership and the fact that we share both boundaries and natural resource issues, we are familiar with many of the challenges and opportunities you face during this process. These include management and recovery of rare species; invasive species management especially prevention and control of habitat transforming weeds; maintenance and restoration of native prairies and other valuable habitat types; the necessity for some herbicide use in restoration and invasive plant control; and the enduring management value of special land use allocations.

We commend the BLM for its continued commitment to active management of the West Eugene sites it owns, and we share an interest in positive outcomes to these issues and to continued productive partnership. We offer our perspectives below for the record even though they are common to many professional land managers in the region, no doubt including members of the BLM planning team.

We have found rare species to be an effective primary driver of land management policy in the West Eugene area, with benefits extending to all aspects of ecosystem function, from biodiversity to carbon cycling.

Controlling invasive species, particularly the few that severely alter habitat or are new in the region, plays a major role in the partnership's land management and recovery efforts. As you know, effective invasive plant management requires elements of education and outreach, prevention, and "early detection and rapid response". Application of integrated pest management principals increases the effectiveness, efficiency and cost savings of such programs. These principals include formal inventory and monitoring; a set of methods to determine treatment priority; analyses to determine treatment methods; and when needed, aggressive treatment chosen from all effective methods.

Protection is critical to the persistence of rare species. Maintenance activities, such as mowing and prescribed fire, are equally important. Species recovery and the broader ecological benefits that accompany it often require active restoration. Restoration methods for Willamette Valley habitat types are rapidly reaching maturity, and many of these methods require removing existing exotic vegetation.

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Both invasive plant management and ecological maintenance and restoration benefit from a flexible approach to herbicide use. We believe that all the R2R partners, including the BLM, recognize that some herbicide use – integrated with all other methods – is necessary to maintain rare species on the landscape and to maintain and restore habitat. We have learned that these goals require at minimum the use of one or two broad-spectrum herbicides such as glyphosate; several broad-leaf herbicides of varying specificity; and grass-specific herbicides. We note that limiting herbicide choices to a pre-determined list of formulations can severely inhibit the success of a land management program: rapid change in our knowledge of herbicide safety and effectiveness necessitates a mechanism to quickly and easily add or remove herbicides from any list of approved formulations.

Special land use allocations, such as "Research Natural Area" and "Area of Critical Environmental Concern" are valuable land use management tools. In particular, where listed plants are present or may be present in the future due to restoration and recovery activities, such allocations provide continued assurance of protection and help managers and the public understand the importance of the resources being managed.

We would like to take the opportunity represented by this planning process to re-emphasize our commitment to partnership and cooperative management among jurisdictions in the West Eugene area. In that spirit, we are happy to offer our assistance with this planning process. Please direct further inquiries to the Environmental Stewardship Section at Fern Ridge Lake; in particular botanist Wes Messinger and wildlife biologist Roberta Swift.

Sincerely,

Dustin E. Bengtson
Deputy Operations Project Manager