

# **Southern Oregon Resource Alliance**

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## COMMENTARY ON MEDFORD DISTRICT OHV PROPOSALS

Southern Oregon Resource Alliance (SORA) is a local association of individuals and organizations united for the defense of conservation in the utilization of our natural resources. SORA views conservation as a responsible balance between the needs of today and the legacy to be provided for tomorrow.

SORA has filed a commentary upon the general WOPR proposed alternatives but would like to specifically address issues peculiar to the Medford District OHV proposals pertinent to all alternatives, particularly as these will significantly impact SORA's local community.

### **SORA Agrees With The Need To Provide Peculiar Recreational Opportunities For OHV Enthusiasts.**

It would seem clear under the 1937 O&C Act that the dedication of the Oregon and California Railroad revested lands to sustained yield timber harvesting included the purpose of opening these lands to recreational opportunity for all. Logging and its collateral road construction has accomplished that purpose admirably. As the DEIS points out, this accessibility "yielded an estimated 3,953,400 visitor days in 2004, of these an estimated 24% were tourists who resided more than 50 miles from the recreation site." (Page 535). This data suggests that more than 3,000,000 residents of the local community will be impacted by the decisions undertaken. Given the population of the area, this suggests a significant public interest and appreciation of the opportunities presently afforded.

At the same time it is clear that there is a growing popularity regarding the use of OHVs. These enthusiasts must be a significant portion of the 3,953,400 recreational users of the O&C forests. It is SORA's position that they have every right to that enjoyment and it is lawful and appropriate to provide them the opportunity.

SORA observes that it appears characteristic of such enthusiasts to cluster together for joint activities and there are lots of OHV parks that attract them for camping, partying, and cross-country riding.

SORA appreciates that such concentrated activity may be devastating to the peculiar terrain chosen for such intense utilization. Accordingly, the BLM plan to establish limited specific recreational sites or OHV parks would seem appropriate where cross-country utilization is contemplated. Parcels of the O&C are appropriately set aside as wilderness areas for hikers. Parcels are set aside for the presumed benefit of spotted owls. It would seem in concert with the 1937 Act to set aside parcels for intense motorized recreation. There would seem no legal justification for assigning hikers greater benefits than riders.

SORA is emphatically in favor of the establishment of specific sites and parks for intense off road and cross country utilization by OHVs.

## **SORA Opposes The Closure of Existing Roads And Trails To Motorized Travel.**

The political movement in recent years by specific activist elements of the community for the creation and expansion of "roadless areas" has spurred great public controversy. The Medford District O&C lands apparently generate some 4 million visitors per year. That recreational opportunity is afforded by the existing roads and jeep trails (most of which are simply old skid trails). Roads and trails are access to the public lands. An extensive array of roads and trails affords excellent opportunity to all to experience that solitude which is so important in the designation of wilderness areas. Particularly this is true for senior retired citizens who generally are not physically able to stand the rigors of hiking into our outback. It is characteristic of the local community that it is made up of large numbers of retired senior citizens. Appropriate utilization of the O&C should under the law accommodate their needs, particularly where such a large percentage of the local users fall into that category.

Our roads and trails as they exist on the O&C provide a quasi-wilderness experience for the enjoyment of all. Decommissioning roads, designating old jeep trails closed, and forbidding motorized utilization will force concentration of utilization onto crowded congested by-ways. This will be a frustration of the recreational goals sought by over 4 million people. SORA questions whether such frustration is appropriate under the 1937 Act.

SORA is emphatically opposed to any additional closure of roads and trails to motorized utilization.

## **SORA Appreciates The Hazards Involved.**

### Destruction of the Landscape

Utilization of the landscape to support off road and/or cross-country OHV travel has an immediate devastating effect upon the local flora. It also presents hazards of wildfire. And it provides an element of noise pollution, particularly where the O&C lands involve checkerboard parcels. Accordingly, care must be exercised in the choice of location for such parks and activities.

It remains a fact that OHV enthusiasts have an equal entitlement to the recreational opportunities afforded by the O&C. The BLM affords O&C for administrative withdrawals including the location of a reservoir. In view of the vast acreage available, it would not seem unreasonable to accommodate the needs of the OHV enthusiasts.

### Roads and Landslides

It is generally appreciated that improper location and/or installation of a road in the mountains, can facilitate a landslide. However, when SORA speaks to the need to maintain existing roads and trails it is clear that the roads and trails in question are now very old. There has been no significant logging leading to new roads since the adoption of the Northwest Forest Management Plan. Both 1996 and 2006 were years that produced significant flooding in the area. If the

existing roads and trails have survived there would seem no great reason to view them as a danger today.

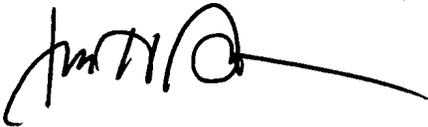
At the same time, depending on site specific considerations, roads or trails naturally decommissioned by landslide should not be repaired.

### **CONCLUSION**

SORA endorses and advocates the establishment of specific sites/parks for the intense off road and cross-country utilization of OHV enthusiasts.

SORA opposes the administrative closure of any existing road or trail to motorized travel.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Swift', with a long horizontal flourish extending to the right.

Jack H. Swift, Vice-Chairman  
Southern Oregon Resource Alliance