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Western Oregon Plan Revisions
Bureau of Land Management
PO Box 2965
Portland, OR 97208

To whom it may concern:

On behalf of the Backcountry Hunters and Anglers (BHA), a national conservation organization based in Eagle Point Oregon, I would like to thank the Bureau of Land Management for the opportunity to provide formal comments regarding the BLM's preferred alternative for the Western Oregon Plan Revisions (WOPR).

Habitat, Winter Range and Wildlife

We cannot accept the old growth timber (late successional reserves) slated to be reduced by over 40% and the increase in clear cut logging to over fourteen thousand acres per year under the BLM's preferred alternative. Low elevation habitat essential to big game such as elk, black bear and black-tailed deer will be reduced in a manner that will be detrimental to those species. These lowland areas on the west side are critical big game winter range as Oregon Department of Fish and wildlife studies have shown. These studies, using collared deer, have shown that deer migrate from the Klamath Basin to winter range near the Green Tops on BLM land near the community of Eagle Point. Quality winter range is essential to big game survival as the animals are in their weakest state during this critical time. Degraded winter range means weakened herds resulting in poor herd health. This leads to lower animal numbers and less opportunity for hunters. We are opposed to any new road building called for in the preferred alternative. The addition of over one thousand miles of new roads greatly fragments the habitat and ruins big game habitat and security for elk. Starkey Experimental Forest studies, (Rowland, Wisdom, Johnson and Penniger- The Starkey Project, 2005), have shown that roads and the increasing vehicle use on those roads have a detrimental effect on elk. It makes absolutely no sense to build more roads when the current ones cannot be maintained. More roads will lead to increases in off road vehicle abuse, poaching, erosion and habitat loss.

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Off Highway Vehicles and Travel Management

Backcountry Hunters and Anglers supports the action alternatives that would remove the current 330,394 acres of "open" area cross-country motorized travel designations in the BLM districts. We agree and support the Roosevelt elk emphasis area in the Salem BLM District, the expansion of the Table Rock Wilderness closure and the North Bank wilderness management area in the Roseburg District. We support the concept of limiting travel to designated routes as marked open and completing Travel Management Plans within the five year window of WOPR implementation. In any Travel Management Plan that utilized a designated route system enforcement of the plan is of the utmost importance. We support an OHV fee and licensing system similar to the Northwest Forest Pass where the tag is clearly visible at all times.

Off Highway Vehicle (OHV) use has been rampant during the last 10 years. OHV use and abuse can disrupt big game migration routes and damage winter range putting an undue stress on fragile wintering herds. They can cause damage to fawning and calving areas and violate the security and increase the stress levels of these young animals and their mothers. They have enough issues to look out for such as predation without having to worry about a mechanized invasion into their space. OHVs also spread noxious weeds and ruin the solitude that many "on foot" hunters and recreationists enjoy. BLM's preferred alternative would designate 11 new and 2 potential "OHV emphasis areas" which would be an increase of 77,000 acres over the current Johns Peak area. Again, much of this would be in critical, low elevation areas such as Johns Peak, Illinois Valley, Anderson Butte, Lake Creek, Salt Creek and the Worthington Road/Obenchain road and several other areas in Southwest Oregon that are critical big game winter habitats. If these emphasis areas are implemented, foot hunters, and other solitude seeking recreationists will not be welcome in these areas that will be over run with loud OHVs. Deer hunting, elk hunting, bear hunting and turkey hunting opportunities in these areas could diminish.

Research from Starkey Experimental Forest indicates that disturbances of big game from All Terrain Vehicles (ATVs) exceed all other recreational activities such as horseback riding, hiking and mountain biking (Naylor, The Starkey Project, 2006). Both state and federal agencies have a difficult time managing OHV use to begin with so it makes no sense to create new "emphasis areas" that can not be managed. Johns Peak provides a clear example of what can and will happen with unchecked OHV abuse. It's an area where the land has been over run by use and abuse of OHVs and local private land owners locked up access to their land because of it. Our view is that if the BLM can not police OHV abuse in certain areas then those roads should be closed to that type of activity. We also strongly believe in a strict enforcement program with perhaps a licensing and fee program to fund enforcement. We also believe that OHV licenses be clearly visible so violators can be found and prosecuted.

BHA recommends the following OHV areas be removed from the plan:

Johns Peak: This is already an emphasis area and because of overuse and abuse, fish and wildlife habitat has been harmed perhaps irreparably, and there are many conflicts with private property owners and residents nearby. This area should be re-evaluated for OHV emphasis use.

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East Howard: 6,812 acres. Many horse back riders use this area and there is excellent hunting for black-tail deer, Roosevelt elk and black bear.

Anderson Butte: 11,742 acres. There is extreme catastrophic wildfire danger on western side of this area, several areas of critical environmental concern and half of the area is located in very important wildlife. There is important winter range for black-tail deer and Roosevelt elk as well as great opportunities for hunting turkey and upland birds. This area is located not far from the growing population centers of Phoenix and Talent and provides an important transition area for wildlife from the high Siskiyou country.

Lake Creke: 8,561 acres. This area has extreme wildfire risk, a critical environmental area and important wildlife habitat. Much of this area is winter range for Roosevelt elk and black-tail deer and there is phenomenal turkey hunting in the area.

Worthington-Obenchain: 9,410 acres. This is one of the prime wintering areas for black-tail deer and Roosevelt elk with plentiful turkey and upland bird hunting opportunities. Much of this area has been vandalized by illegal and abusive OHV use on and near the Green Tops and is now beginning to recover. Many local land owners use the area for hiking and horseback riding and there are increasing conflicts between adjacent private property owners and illegal OHV users.

At this time we do not have enough biological data to comment on the other OHV “emphasis areas” that are in the alternative.

Areas of Critical Environmental Concern

Under the BLM’s preferred plan, many of the Areas of Critical Environmental Concern are stated to be removed from protection. Areas such as the North Santiam ACEC, Sandy River Gorge ACEC, Cottage Grove Old Growth ACEC, Umpqua River Wildlife Area ACEC, North Umpqua River ACEC, Jenny Creek ACEC, Rough and Ready Creek ACEC and the Upper Klamath River ACEC, are important habitats for fish and wildlife and offer people some outstanding and unique recreational opportunities. These areas must maintain their status as they have already been evaluated as outstanding areas and do not need to be further developed.

Backcountry Hunters and Anglers Recommendations

We would like to see the BLM evaluate OHV emphasis areas district by district separate from the WOPR. Because the final EIS published by the BLM did not contain an adequate and balanced number of choices, BHA recommends that they offer a full range of diverse alternatives that retains protections for fish, wildlife, forests and streams under the 1994 Northwest Forest Plan.

We encourage federal natural resource management agencies to take more of a stewardship role to emphasize recreation on public lands. Mining and logging is part of the multiple use mandate of our public lands but it is not the only option that we should consider. Hunting and angling as well as other forms of recreation are long term and completely renewable. Hunting and angling annually generates over \$857,000,000 in Oregon (USFWS, National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, *State Overview*, 2006) with over 750,000 people

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participating in these activities. We need to protect our fish and wildlife resources and our hunting and angling heritage for future generations of Oregonians.

Sincerely,

Anthony J. Heckard
Backcountry Hunters and Anglers
Oregon Chairman
5038299225

A handwritten signature in black ink, appearing to read "Anthony J. Heckard". The signature is written in a cursive style with a large, sweeping flourish at the end.

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