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RECEIVED

JAN 07 2008

January 1, 2008
Bureau of Land Management
Western Oregon Plan Revisions Office
333 SW 1st Avenue
Portland, OR 97208

**RE: WOPR MUST REDUCE OHV USE AREAS, NOT EXPAND THEM, and PROTECT
REMAINING LARGE TREES, NOT CUT THEM**

I do not wish to have my name or address released to the public.

OHV Use Areas: As a long-time resident and recreationist of the Applegate Valley in southwestern Oregon's Medford District of the BLM, I feel compelled to convey my strong objection to the proposed WOPR plan alternatives, all of which contain provisions for designation of up to 13 OHV-use areas throughout the Medford District, and in particular, in the delicate and environmentally important watersheds of the Applegate Valley.

I am a runner, hiker, horseback rider, and small woodland and vineyard owner and manager. My family and I use our public lands, including BLM lands, regularly for our activities. As far as I am aware, in the more than 15 years during which we have been doing these activities here in southwestern Oregon, our activities have not adversely impacted recreational opportunities of any other public land users, nor of adjacent land owners, nor have we contributed to the degradation of trails and soil stability, or of wildlife and fish habitat. We try hard to be responsible users of our public lands and respect private property. We make conscious efforts to minimize our adverse impacts in the outdoor environment, avoiding sensitive plant or soils areas, avoiding trails that are muddy during the wet season, repairing water bars on the spot when we see a need, and packing out our own trash (as well as that of others, unfortunately). In summer, we work alongside BLM staff and members of the general public on trail and recreation projects on our public lands.

When I encounter other hikers, runners, and equestrians during my recreational activities, they do not adversely impact my enjoyment of our public lands, nor do their activities disturb adjacent landowners as far as I am aware. These are all low-impact uses that do not preclude enjoyment by others.

OHV use, however, has the effect of eliminating all other recreational opportunities besides motorized use. The unbearable noise is the most obvious factor that destroys the forest environment for others, but the fumes and trail impacts are also huge factors. Obviously, given the extensive public outcry against OHV use in the Johns Peak and other areas within the Medford District, I am not alone in this opinion. Aside from the elimination of use by non-motorized recreationists, it is hugely difficult and expensive to manage and enforce proper OHV use, even where there are large unbroken blocks of agency ownership, let alone where ownership is mixed, as it is in most of the Medford district. As a result, OHV users cause intense damage to trail systems, soils, vegetation, and wildlife habitat that are expensive and sometimes impossible to repair or maintain. By the admission of BLM's own staff at public meetings, trail and road closures and designations are impossible to enforce, and BLM (and Forest Service and County as well) does not have the funds to hire sufficient law enforcement to reduce this problem. Even if designating areas to be managed specifically for OHV use increases the availability of funds for enforcement and maintenance, it will not be sufficient to do the job adequately in these mixed ownership areas. It is foolish to even consider adding designated OHV emphasis areas under these conditions.

OHV use is simply not compatible with non-motorized uses. It is also absolutely inappropriate on, and not compatible with, lands that have checkerboard ownership patterns, such as most of the Medford District, especially in the Timber Mountain-Johns Peak (TMJP) area where the vast majority of adjacent landowners (over 1600 of them, including myself) are on record as opposing OHV use due to already existing conflicts between users and landowners, and to trail and resource damage. It is simply impossible to enforce any agency's trail use and land use rules in this situation. While it may be that it is a minority of OHV users who are causing the majority of these problems, the fact is that OHV use is such an intrusive and exclusive use of the lands that even this supposed minority causes unacceptable conflicts and damage that can not be allowed or tolerated. I live in the Slagle Creek watershed, just to the west of the ridge being proposed for TMJP OHV area western boundary (as seen on maps at various BLM public meetings over the past several years). There are protected plant species, owl nest trees, wildlife corridors, and steep slopes with sensitive soils throughout the watershed on both sides of the ridge. Already, we have experienced occasional problems with rogue OHV riders leaving the BLM roads and going cross-country on onto hiking trails on our side of the mountain, where they have left rutted soils, torn up vegetation and ground cover, and ruined trail tread. My family and I have been hiking, running, and riding horses on these same trails for over 15 years and have never seen the amount of damage that is caused by one pass of a motorcycle or ATV.

We realize the OHV manufacturing industry is rich, huge, and powerful, and the MRA is well-financed in southern Oregon and exerts constant pressure on Medford BLM to designate more areas for OHV use. The fact remains, however, that however well-financed they may be, OHV users are far outnumbered by quieter and less-powerful (read "less well-funded") non-motorized users. Our public lands belong to all of us, and the rich minority should not be allowed to run the BLM's decision-making process. Instead, the BLM is obligated to consider the majority of its users, the non-motorized recreationists over the OHV users.

We have heard attempted justification of developing OHV areas in these areas as necessary so that the OHV riders don't have to travel so far to enjoy their chosen activity. Think about it. Skiers would love to just be able to go to Jacksonville, Ruch, or Ferris Gulch, etc to go skiing. They cannot, of course, because the necessary conditions do not exist in those places, so they have to travel to where those conditions do exist. So too, OHV users may have to travel to where the conditions are conducive for their use....NOT an area with checker board ownership, sensitive soils, protected species habitat, etc.

We understand that under the current plan of no designated OHV use areas the Medford district roads and trails are all fair game for OHV users. This is not acceptable. We agree there should be designated areas for OHV use to occur, and that OHV use should be expressly disallowed (and enforced!) every where else. However, the selection of those areas to be sacrificed to OHV use must be carefully considered to minimize adverse impacts to other users, adjacent landowners, and natural resources. The checkerboard-ownership lands of the Middle Applegate Valley area, with the high degree of intermix of anti-OHV landowners as well as high resource values (including protected owls, salmon, and others) are absolutely not appropriate for all the reasons discussed above. The proposed Timber Mountain-Johns Peak OHV absolutely must not be designated for OHV use. If you had visited You Tube as little as 2 or 3 weeks ago you would have been able to watch at least four video clips of the kind of idiotic "mudbogging" enjoyed by 4-wheelers and dirt bikers that occurs in the Johns Peak area, as well as Wagner Creek and the Illinois Valley-O'Brien area, all areas in and around the Medford District with checkerboard public lands. These clips appear to have been removed from the You Tube web site within the past couple of weeks. Fortunately, at least a couple of us were able to make some screen captures of some of the views (attached), as well as capture at least one of the video clips in its entirety and copy it to DVD. License plates are legible in some of our screen captures. This kind of use is inevitable in an area where OHV use is encouraged, and especially when enforcement is absent or insufficient. By the BLM's own admission, BLM lacks

sufficient enforcement capability. Publicly available law enforcement reports for local and nationwide BLM and US Forest Service regularly contain reports of incidents involving illegal and inappropriate OHV use. The problem is clearly not just local, and is growing. For the Medford District to be considering 13 OHV-emphasis areas is absolutely unacceptable in this relatively small area with such checkerboard ownership where enforcement is impossible. We do not need to INCREASE areas of OHV use, but confine, enforce, and decrease the extent!

Forest Management: The draft WOPR does not adequately address the differences in ecosystem characteristics and timber production potential that exists between the areas of the Medford District in southwest Oregon and those cooler, moister regions to the north. Clear cutting and road construction in today's complex forestland use and management conditions are questionable at best due to erosion, sediment delivery to streams, radical disruptions of wildlife habitat and aesthetics, and slope instability issues. In the hotter, drier conditions of southwestern Oregon (Medford District), clear cutting is absolutely not a timber harvest method that should be employed, except in very small (less than an acre) situations where forest health and wildlife habitat warrants. The growth potential here in southwest Oregon is far less than that of the moist forestlands to the north, and clear cut areas, even when replanted, do not recover as quickly. Selective harvest methods must be employed in this region to manage forest health and provide wood products. The BLM MUST stop the money-based management that favors the timber industry at the expense of our watersheds and wildlife and recreational enjoyment. In the long term, the water and natural resource values are far more valuable than the timber, and repairing the long-term damage from road building and clear cutting is far more expensive than employing selective harvest methods that do not require new roads.

Moreover, the few areas where large diameter trees remain should be carefully managed to retain these large trees. Thinning from below, in some of these areas, may be appropriate for forest health and wildlife habitat benefits, but any trees of large diameter must not be cut. The specific diameter retention rules must be set by forest and wildlife ecologists, but is probably somewhere in the vicinity of 24" or so. We should learn from the lessons of other regions and other countries who have realized too late that managing for the greed of short-term profits of a few sacrifices for all of us the long term the irreplaceable values provided by old-growth forests. This kind of management does not always result in a positive cash flow from the sale of timber products, but rather costs money to accomplish.

As owner and active manager of some 70 acres of mixed forest adjacent to BLM lands, I am well aware of how expensive it is to properly manage these forests. My goals, and what should be the goals of our public land managers, are healthy forests, watersheds, wildlife habitat. I spend many hours of labor and a lot of money out of pocket to thin the dense shrubs and ladder fuels, thin the conifers, and restore fire resilience and habitat. I cannot even consider commercial logging in today's timber market conditions, since to pay for itself I would have to clear cut the largest trees, and this is contrary to my forest management goals. So too it is with the BLM lands in southwestern Oregon, where clear cutting is simply not appropriate for these forest ecosystems.

In summary, the WOPR must prohibit OHV use in the Timber Mountain-Johns Peak area and other areas of checkerboard land ownership and sensitive resources, NOT encourage it. Where it is allowed it must be carefully and diligently enforced. If these conditions cannot be met, it should be prohibited, rather than left as the in current plan - allowed on existing roads and trails, since this is clearly NOT working to protect our public lands and is in violation of the BLM's stewardship obligation.

The WOPR must provide a better analysis and prescription for the hotter drier forests of southwestern Oregon that places less emphasis on timber extraction and more emphasis on forest and ecosystem health.

Sincerely,


Jim Clover, Applegate Valley landowner, resident, and concerned user of our public lands

The following pages contain unaltered screen captures from the YouTube web site, captured late November 2007. Note reference to "John's Peak OHV area" and "Wagner Creek", both on the Medford District. After viewing several of these disturbing clips, I noticed another one listed on the right that mentioned an area near O'Brien in southern Oregon, also in the Medford District.

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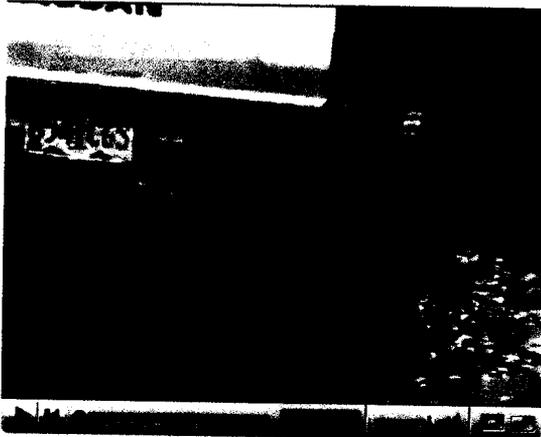
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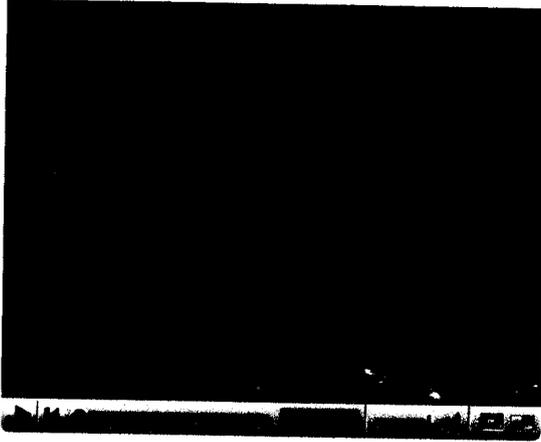
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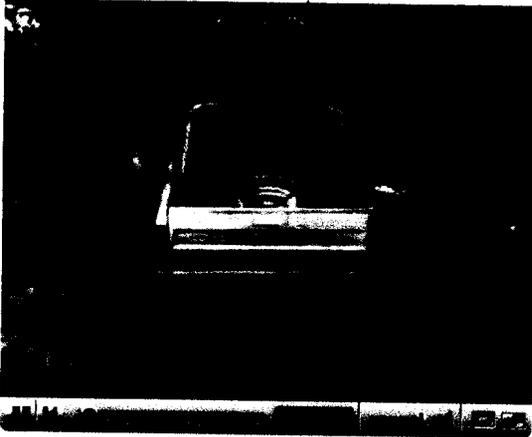
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