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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Salem District Office
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Salem, Oregon 97306
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TAKE PRIDE IN AMERICA

In Reply To:

1784 (OR-080)

DEC 27 2007

Mr. Dick Prather
W. Oregon Plan Manager
Oregon State Office
Bureau of Land Management
333 S.W. 1st. Avenue
Portland, OR 97204

Dear Mr. Prather:

Members of the Coast Range Advisory Committee met on August 23, September 13 and October 11, 2007 to discuss and recommend improvements to the Western Oregon Plan Revision (WOPR) Draft Environmental Impact Statement (EIS). The meetings were facilitated by Oregon State University Professor Gregg Walker and Dana Lurcero of Daylight Decisions.

The Coast Provincial Advisory Committee (PAC) represents a diverse group of publics. Each meeting averaged 10-12 Coast PAC members. A core group of members attended at least two of the three meetings. All members were given the opportunity to comment on the final Coast PAC WOPR response via email.

Attached is the result of the rich discussions that took place among the PAC members in attendance. Individual Coast PAC members did not always agree on the recommendations made by the group. Members were encouraged to submit their dissenting comments, and those comments that went beyond the scope of the attached document, via the WOPR website.

We hope the Coast PAC's comments will help the Western Oregon Planning Team in their planning efforts.

Sincerely,

Aaron Horton
Salem District Manager

Attachment

cc:
Ginny Grilley, Eugene District Manager
Coast PAC members

Coast Range Province Advisory Committee

Recommendations to US Bureau of Land Management (BLM) regarding the Western Oregon Plan Revision Draft Environmental Impact Statement

Members of the Coast Range Province Advisory Committee met on August 23, September 13, and October 11, 2007 to discuss and recommend improvements to the Western Oregon Plan Revision Draft Environmental Impact Statement (EIS). The following is a result of rich discussions that took place among the members in attendance.

Recommendation 1 **The Draft EIS needs a better baseline of the economic benefits of recreation (in Chap 3) and qualitative analysis of the differences between the Alternatives (Alts) (Chap 4). Use this information to disclose the significance of and enhance the role of recreation in the plan.**

Rationale

Recreation opportunities are affected by forest practices. Timber harvests should not be conducted in ways that diminish the recreational experience of those who prefer relatively natural settings. Consider non-motorized vs. motorized recreation impacts.

It is important to understand the economic benefits of recreation. There needs to be more parity with timber data. Different organizations can provide relevant data. The Bureau of Land Management (BLM) should review data provided by the Outdoor Industry Foundation (for economic contributions) and Oregon State University (OSU) Cascades campus (new data on recreation demand). Information from the Sonoran Institute should be considered.

Recommendation 2 **Consideration should be given to obliterated roads for recreational opportunities. BLM should facilitate access to other routes during road obliteration.**

Rationale

Existing recreation uses may be limited or stopped when roads are obliterated. Road obliteration should enhance or maintain access and not restrict it.

Recommendation 3 **The Draft EIS should help us visualize the impacts of management actions (like cutting). Show us an example in each province (for the 6th field watershed level) of what it will look like for each Alternative.**

Rationale

The document doesn't portray the impacts on specific sites currently used for recreation. The Coast Range PAC could give specific cases to BLM, such as Hult Pond and current Mary's Peak SRMA.

Recommendation 4 **Revise the DEIS to provide specific information about recreation plans, programs, safety, and budget information (i.e., safety considerations, like additional postings). There should be parity in information and specificity akin to timber information.**

Rationale

Explicit recreation statements and information will give recreation users and groups something to relate to in the Draft EIS. BLM should include specific examples of projects that may occur under the revised management plan. The language of the O&C Act emphasizes recreation facilities.

Recommendation 5 **When a designated use area is created or rescinded or a change is made, the criteria or rationale for doing so should be clear. How user input is considered should be demonstrated.**

Rationale

Criteria seem to be present for other uses, but not for OHV activity. Providing criteria is consistent with Executive Order 11644.

Recommendation 6	**The BLM should thoroughly analyze the impacts (socioeconomic and environmental) of OHV use across all Alternatives. The Alternatives should include a more developed impact analysis for OHV use than is in the DEIS.**
Rationale	OHV use is concentrated in Alternative 2.
Recommendation 7	**The Draft EIS should address the conundrum of access agreements with private land owners, including exclusive or reciprocal public access.**
Rationale	Access to public land can be hampered because of the checkerboard pattern of private and public ownership.
Recommendation 8	**Thinning should be emphasized more in whichever Alternative the BLM chooses. Additionally, selective cutting should be considered and emphasized prior to conducting a regeneration harvest whenever possible.**
Rationale	Fire suppression, biodiversity, forest health are critical issues and concerns. Information is needed about how long thinning can occur as sole source before regeneration harvest is necessary (District information for Alternative 1).
Recommendation 9	**The BLM should recommend stewardship contracting, while paying attention to the county receipts issue.**
Rationale	This is a part of a suite of practices to improve forest health management.
Recommendation 10	**The BLM should clarify guidance for silviculture prescriptions. The Final EIS should include green tree retention. The trees left should be large enough to support habitat and ecological values. This part of Alternative 3 should be included the selected Alternative (in the FEIS).**
Rationale	The BLM should be clearer about regeneration harvest impacts, including site genetics, insect and bird habitat. Green trees support forest health.
Recommendation 11	**The plan revision needs to better explain how economic analyses were performed. The revision document should also account for revenue streams from non-timber forest activities. The BLM should address the economic value of viewsheds.**
Rationale	Viewsheds (for recreation use or community values) and habitat connectivity are important. The plan revision should acknowledge that these factors have economic worth. There needs to be balance between recreation values, timber values, and community values.
Recommendation 12	**The DEIS should reaffirm (and be clear about) the non-timber values that come from regeneration harvests.**
Rationale	There are public uses that can only occur in a clear cut area. There are biological benefits (e.g., elk). Habitat cannot rely solely on private landowners for open terrain created by regeneration harvests. Undergrowth can diminish those other uses and views in a relatively short amount of time.
Recommendation 13	**There should be allowance for cutting of trees in creating and maintaining viewing spots.**
Rationale	Timber harvest can improve wildlife viewing; opening areas that you couldn't otherwise see.
Recommendation 14	**Riparian buffers should account for wildlife corridors and mobility of the aquatic corridor over time. Riparian buffers should be large enough to support the proper riparian function (water quality, stream temp, beneficial use, sediment and gravels input, erosion control).**
Rationale	The plan needs to take into account the mobility of aquatic corridors over time. PAC members are very concerned about the reduction in size of riparian buffer zones. Public forest ecosystems are just beginning to benefit from the buffer size under the NW Forest Plan.

Recommendation 15	**Cumulative impacts of the Alternatives on riparian buffers need to be better addressed.**
Rationale	What are the cumulative impacts of smaller buffers? The reduction does not help achieve and maintain to water quality standards. Water quality cannot be compromised.
Recommendation 16	**The Draft EIS should clearly define salvage and describe what trees get salvaged under what conditions. Salvage should not cut viable trees.**
Rationale	Clarifying plans for salvage, and conditions under which salvage can occur, will increase the level of trust for the BLM.
Recommendation 17	**If harvest was prohibited in an area prior to a disturbance, it should not be permitted after the event (under all Alternatives). Exceptions should be made for safety.**
Rationale	Individual project plans can accommodate specific actions.
Recommendation 18	**The BLM should clearly define the management plan for invasive species. Specify how the plan revision will control and eradicate invasive species (in areas of regeneration harvests, riparian areas, roads). Wherever possible the BLM should partner with groups (e.g., federal and state agencies, Non-Governmental Organizations (NGOs), corporate and individual private landowners) to tackle invasive species aggressively.**
Rationale	Dispersed land ownership patterns make the invasive species issue difficult to manage. Minimize ground disturbance. Early interdiction is needed. Look for opportunities to partner with agencies and groups to tackle invasives.
Recommendation 19	**The special forest products permitting and leasing process needs to be adaptive and flexible. The BLM should develop a comprehensive special forest products management plan that could include such things as a competitive bid process, leasing, increased permitting, enforcement and monitoring.**
Rationale	Examine the way other Federal agencies lease oil and gas sites (bidding on tracks of land). The challenge is to get a handle on who's out there; Special Forest Product (SFP) activity is so disperse. It is hard to nail down what is coming off the land and correlate value. Enforcement is a problem.
Recommendation 20	**The BLM should address more thoroughly the socioeconomic benefits of special forest products.**
Rationale	There should be a parity of data and information on this issue with other issues.