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Western Oregon Plan Revisions
P.O. Box 2965
Portland, OR 97208
www.blm.gov/or/plans/wopr

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January 11, 2008

RE: Comments on the Draft Environmental Impact Statement for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management Districts.

The BlueRibbon Coalition (BRC) is a nationwide organization representing approximately 600,000 motorized recreationists, equestrians, mountain bike enthusiasts and resource users. A significant percentage of our members recreate in Oregon and use motorized vehicles, including off highway vehicles, to access lands managed by the Oregon BLM. In addition to access travel itself, BRC members visit the lands mentioned herein for motorized recreation, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping and other similar pursuits. BlueRibbon's members and supporters have concrete, definite and immediate plans to continue such activities in the future.

Comments on proposed SRMA's:

Based on communication with some of our members in Oregon, the BLM's 'motorized SRMA' proposals as outlined in the DEIS seem to make sense. The one exception is the "Wonder" area (west of Hwy 199) where there are approximately 50 to 60 miles of quality single track motorcycle trails. Some members indicated that Club rides and "Poker Runs" have been held in this area since the early 1980's. BRC formally requests the BLM study the feasibility of establishing a 'motorized SRMA' in this area.

Perhaps the most important comments we received were regarding a perceived lack of motivation to partner with the OHV community when managing vehicle based recreation. One BRC member related a story where a relatively simple MOU took over three years to finalize. Our recommendation here is for the BLM to consider including in the RMP specific direction to enter into cooperative management agreements with OHV groups in each SRMA. We encourage the BLM not to wait for a future implementation plan or RAMP to provide such direction.

Flawed "range" of Alternatives

The present range of alternatives is flawed. Given the increase in popularity of OHV use and the corresponding reduction in available opportunities across the region the agency

should have developed a true “range” of alternatives, including a “maximum recreation alternative,” or a alternative that at least did not reduce motorized recreation.

Lands with Wilderness character

BRC and its partners have on numerous occasions addressed the manner in which BLM may appropriately discharge its FLPMA-prescribed review and management of “lands with wilderness character.” The materials in this Section restate and clarify BRC’s position. In presenting this information, we specifically note and incorporate by reference the pleadings and decision(s) in the long-running *State of Utah v. Norton*, litigation. In particular, we note the District of Utah Court’s summary, contained in its September, 2006, opinion, which states:

It makes no sense that the same Congress that jealously recognized its sole authority to declare wilderness and that set up two major laws (the Wilderness Act and FLPMA) to accomplish a properly considered exercise of that authority, would have created within one general section (section 202) of FLPMA an open-ended authority on the part of the executive branch of government to create WSAs which, once created, result in *de facto* wilderness. The Wilderness Act’s process clearly ended in ten years, and FLPMA’s wilderness designation provision, including those relating to the creation of WSAs, clearly ended in 1991....

State of Utah v. Norton, 2006 WL 2711798 at *29 (Sept. 20, 2006).

Congress gave very specific instructions to the BLM regarding Wilderness. Those instructions are contained in Section 603 of FLPMA. Congress instructed the agency to inventory all of their lands, identify which were definitely not of wilderness quality and then to begin an intensive inventory and analysis to determine which of the remaining lands would be recommended for inclusion into the National Wilderness Preservation System.

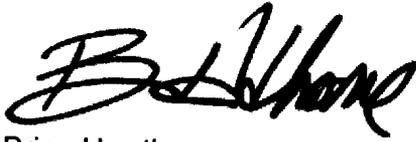
There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing wilderness inventory and review. Once the “603 Process” was completed, the agency is done. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American People. Other than the management of existing WSA’s, the BLM should have no part in this issue. To do so is a tragic loss of management resources.

The DEIS appears to argue that its “Lands with Wilderness Character” are not WSAs, and FLPMA allows management for certain resources associated with Wilderness (opportunities for solitude, outstanding opportunities for primitive and unconfined recreation etc.). Thus BLM argues, the Lands with Wilderness Character designation is legal. But BLM’s management of Lands with Wilderness Character is nearly identical to the WSA IMP. The BLM is simply calling these new WSA’s by a different name.

Conclusion:

BRC is eager to assist the Oregon BLM in formulating sustainable and enforceable management plans. We appreciate the opportunity to comment. If you have any

questions or require additional information regarding these comments, please do not hesitate to call.

A handwritten signature in black ink, appearing to read "B Hawthorne". The signature is fluid and cursive, with the first letter "B" being particularly large and stylized.

Brian Hawthorne
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BlueRibbon Coalition
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