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Western Oregon Plan Revisions
P. O. Box 2965
Portland, Oregon 97208

JAN 15 2008

January 11, 2008

RE: DEIS for the Revision of Western Oregon RMPs

Dear Sirs:

I am writing this letter in response to the Draft EIS for the Revision of the Western Oregon Resource Management Plans. I ask that you retain this letter for the record and that you consider and respond to the questions I pose and the requests I make.

Your three volume DEIS Impact Statement has been a burden for me for several months. I've attended many of your meetings. I've read your documents during free minutes and while traveling. I've called agency representatives for clarifications of names, issues and acronyms. Here I am at the end of this comment period and I still don't know where to start.

I understand this effort is the result of a settlement agreement and so the main focus is on timber management while maintaining wildlife habitat. This is all good in my opinion. The O & C lands are supposed to produce a sustainable harvest to help support the counties where they are located. Otherwise the BLM should pay taxes like any other land owner. It appears either Alternative #2 or Alternative #3 can address this need.

A second requirement for management under the O & C Act is that you manage for recreation. The document provides what I consider to be a limited and somewhat superficial coverage of this important area. BLM land adjacent to urban areas is prime for consideration for recreational use. Per Brian Hawthorne, Blueribbon Coalition, "According to the Outdoor Recreation for the 21st Century America: A Report to the Nation, The national Survey on Recreation and the Environment (H. Cordell, 2004), the number of people driving motor vehicles off road in the United States increased over 109% from 1982 to 2000. In New Mexico, the report estimates over 25% of the public enjoys OHV recreation." The Bureau of Land Management's OHV Strategy states:

"Motorized off-highway vehicle use on public lands administered by the Bureau of Land Management has increased substantially in recent years.....Some of (the factors contributing to growing OHV popularity) are:

- * greater public interest in unconfined outdoor recreational opportunities.
- * rising disposable income....
- * advances in vehicle technology
- * the rapid growth of the West's cities and suburbs.....
- * a population with an increasing median age with changing outdoor recreational interests

This (growing OHV) popularity is evidenced by the fact that recreational enthusiasts are buying OHVs at the rate of 1,500 units per day nationwide, with nearly one-third of them doing so as first-time buyers." "(BLM's OHV) Strategy recognizes, as does policy outlined in BLM Manual 8340 (May 25, 1982), that off

road vehicle use is an 'acceptable use of public land wherever it is compatible with established resource management objectives.' As established by the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM is required to manage public lands on the basis of multiple use and sustained yield, while protecting natural values.....Motorized OHV use is now firmly established as a major recreational activity on BLM-administered public lands.

Current literature tells us of the importance of getting our children (and adults for that matter) out of the house and exercising in the out of doors. BLM, along with the rest of the country has moved into a time when the focus for Federal Land Management has supposedly moved from resource extraction to recreation and tourism. I don't see this in your document. There is a somewhat brief coverage of OHV management primarily in the Medford District. Why the slight of the Eugene, Roseburg, Salem and Coastal Districts? It appears Alternative #2 best addresses the needs of recreation but it is barely a beginning.

Some specific issues and questions from the document follow. I am unable to correlate the areas identified as "new" areas having wilderness characteristics {p.LXIII) with the "acres" of designated roads and trails on the same page. Table #22 identifies these areas as being primarily in the Salem District with 3,000 acres in the Coos Bay District. If there are existing roads and/or trails in these newly identified acres with wilderness characteristics, I expect those roads and trails to be retained for their historical use throughout all phases of this project and in whatever alternative is selected.

On page #120, Table #43, it appears the Row River Trail Special Recreation Management Area would be reduced from 15,000 acres to 171 acres under all of the action alternatives. If this is being proposed in order to put those acres into the timber base, I object. The land can serve more than one purpose. Please retain Special Recreation Management Areas under whichever alternative is selected. I don't see why timber harvest could not occur in a Special Recreation Management Area.

On page #131, Item #43, there is indication that Hamaker Day Use snow - park will be reduced from 30 acres to 2 acres under the action alternatives. A person named Scott in the Klalmath Falls Office assured me this is not the "Hamaker" Snow Park regularly used the Rogue Snowmobile Club. He advised me the area of use has never been more than 2 acres and they are trying to bring the plan in line with what really exists. If this is true and the Hamaker Day Use snow park is not available or perhaps not appropriate for snowmobile use, then I can't fault the reduction in acres although I see no good reason to do so unless there is a plan for some other use for the land.

On page 139, under the Eugene District, there is listed 77 acres of land that would be "open" to OHV travel under all action alternatives. I believe this to be misleading as the area is presently fenced and there is no vehicle access to the area. Local managers lead me to believe there will never be an "open" dunes area on the Eugene District. Please fix this misleading mistake.

The Off Highway Vehicle Area designations on page 139 are confusing and misleading because they are listed in **acres** rather than miles. I request you include in the Alternative selected, that existing roads and trails are open and that expansion or closures will be considered at the District level.

Page #147, Table # 59 addresses the suitability of Rivers for Wild and Scenic designation. I do not believe this task should be addressed in a document mandated to deal with timber harvest issues. It is not only inappropriate but confusing. One column on this table lists total miles of river and the next lists acres of BLM land. I'm told by BLM that a lineal mile of river is 90 acres. I was unable to find any place on the table where I could multiply the miles of river by 90 and get the figure written in the next column. Further, there is no advantage to the public, the agency or the river that I can see would result from such a designation. I urge against including a listing of river segments determined suitable for Wild and Scenic designation in any of the selected alternatives.

In summary, if I had to "vote" on an alternative it would be number 2. Rather, I would like to see this process divided in to three efforts.

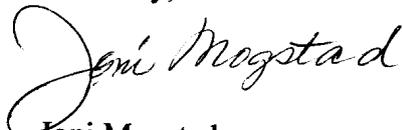
The first would comply with the settlement agreement and develop a plan for managing timber.

The second would address road and trail management and development of infrastructure for recreational access and use.

The third effort would consider issues of Wilderness Characteristics, Visual Resource Management, Wild and Scenic Rivers and so on. That way, maybe, a person could get their arms around this whole thing.

As requested earlier, please keep my comments for the record. Please continue to keep me advised as this process moves forward.

Sincerely,



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