

APPENDIX I

PUBLIC LAW 92-260



Public Law 92-260
92nd Congress, S. 1977
March 23, 1972

An Act

To establish the Oregon Dunes National Recreation Area in the State of Oregon, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That, in order to provide for the public outdoor recreation use and enjoyment of certain ocean shorelines and dunes, forested areas, fresh water lakes, and recreational facilities in the State of Oregon by present and future generations and the conservation of scenic, scientific, historic, and other values contributing to public enjoyment of such lands and waters, there is hereby established, subject to valid existing rights, the Oregon Dunes National Recreation Area (hereinafter referred to as the "recreation area").

Oregon Dunes
National Recreation
Area.
Establishment.

SEC. 2. The administration, protection, and development of the recreation area shall be by the Secretary of Agriculture (hereinafter called the "Secretary") in accordance with the laws, rules, and regulations applicable to national forests, in such manner as in his judgment will best contribute the attainment of the purposes set forth in section 1 of this Act.

Administration.

SEC. 3. The portion of the recreation area delineated as the "Inland Sector" on the map referenced in section 4 of this Act is hereby established as an inland buffer sector in order to promote such management and use of the lands, waters, and other properties within such sector as will best protect the values which contribute to the purposes set forth in section 1 of this Act.

"Inland Sector."

SEC. 4. The boundaries of the recreation area, as well as the boundaries of the inland sector included therein, shall be as shown on a map entitled "Proposed Oregon Dunes National Recreation Area" dated May 1971, which is on file and available for public inspection in the Office of the Chief, Forest Service, Department of Agriculture, and to which is attached and hereby made a part thereof a detailed description by metes and bounds of the exterior boundaries of the recreation area and of the inland sector. The Secretary may by publication of a revised map or description in the Federal Register correct clerical or typographical errors in said map or descriptions.

Map.

Revision.
Publication in
Federal Register.

SEC. 5. Notwithstanding any other provision of law, any Federal property located within the boundaries of the recreation area is hereby transferred without consideration to the administrative jurisdiction of the Secretary for use by him in implementing the purposes of this Act, but lands presently administered by the United States Coast Guard or the United States Corps of Engineers may continue to be used by such agencies to the extent required.

Transfer of
Federal property.

86 STAT. 99
86 STAT. 100

SEC. 6. The boundaries of the Siuslaw National Forest are hereby extended to include all of the lands not at present within such boundaries lying within the recreation area as described in accordance with section 4 of this Act.

Siuslaw National
Forest boundary
extension.

SEC. 7. Within the inland sector established by section 3 of this Act the Secretary may acquire the following classes of property only with the consent of the owner:

Land acquisition.

- (a) improved property as hereinafter defined;
- (b) property used for commercial or industrial purposes if such commercial or industrial purposes are the same such purposes for which the property was being used on December 31, 1970, or such commercial or industrial purposes have been certified by the Secretary or his designee as compatible with or furthering the purposes of this Act;

(c) timberlands under sustained yield management so long as the Secretary determines that such management is being conducted in accordance with standards for timber production, including but not limited to harvesting reforestation, and debris cleanup, not less stringent than management standards imposed by the Secretary on comparable national forest lands: *Provided*, That the Secretary may acquire such lands or interests therein without the consent of the owner if he determines that such lands or interests are essential for recreation use or for access to or protection of recreation developments within the purposes of this Act. In any acquisition of such lands or interests the Secretary shall, to the extent practicable, minimize the impact of such acquisition on access to or the reasonable economic use for sustained yield forestry of adjoining lands not acquired; and

(d) property used on December 31, 1970, primarily for private, noncommercial recreational purposes if any improvements made to such property after said date are certified by the Secretary of Agriculture or his designee as compatible with the purposes of this Act.

SEC. 8. (a) Within the boundaries of the recreation area lands, waters, and interests therein owned by or under the control of the State of Oregon or any political subdivision thereof may be acquired only by donation or exchange.

Southern Pacific
Railway right-
of-way.

(b) No part of the Southern Pacific Railway right-of-way within the boundaries of the recreation area may be acquired without the consent of the railway, so long as it is used for railway purposes: *Provided*, That the Secretary may condemn such easements across said right-of-way as he deems necessary for ingress and egress.

Owners of improved
property, reten-
sion rights.

(c) Any person owning an improved property, as hereinafter defined, within the recreation area may reserve for himself and his assigns, as a condition of the acquisition of such property, a right of use and occupancy of the residence and not in excess of three acres of land on which such residence is situated. Such reservation shall be for a term ending at the death of the owner, or the death of his spouse, whichever occurs later, or, in lieu thereof, for a definite term not to exceed twenty-five years: *Provided*, That, the Secretary may exclude from such reserved property any lands or waters which he deems necessary for public use, access, or development. The owner shall elect, at the time of conveyance, the term of the right to be reserved. Where any such owner retains a right of use and occupancy as herein provided, such right may during its existence be conveyed or leased in whole, but not in part, for noncommercial residential purposes. The Secretary shall pay to the owner the fair market value of the property on the date of such acquisition less the fair market value on such date of the right retained by the owner. At any time subsequent to the acquisition of such property the Secretary may, with the consent of the owner of the retained right of use and occupancy, acquire such right, in which event he shall pay to such owner the fair market value of the remaining portion of such right.

Exclusion.

86 STAT. 100
86 STAT. 101

"Improved
property."

(d) The term "improved property" wherever used in this Act shall mean a detached one-family dwelling the construction of which was begun before December 31, 1970, together with any structures accessory to it and the land on which the dwelling is situated, the said land being in the same ownership as the dwelling, as the Secretary finds necessary for the enjoyment of the dwelling for the sole purpose of noncommercial residential use.

Hunting, fishing,
and trapping.

SEC. 9. The Secretary shall permit hunting, fishing, and trapping on lands and waters under his jurisdiction within the boundaries of the

recreation area in accordance with applicable laws of the United States and the State of Oregon, except that the Secretary may designate zones where, and establish periods when, no hunting, fishing, or trapping shall be permitted for reasons of public safety, administration, or public use and enjoyment. Except in emergencies, any regulation of the Secretary pursuant to this section shall be put into effect only after consultation with the appropriate State fish and game department.

SEC. 10. The lands within the recreation area, subject to valid existing rights, are hereby withdrawn from location, entry, and patent under the United States mining laws and from disposition under all laws pertaining to mineral leasing and all amendments thereto. Mining restriction.

SEC. 11. (a) The Secretary is authorized and directed, subject to applicable water quality standards now or hereafter established, to permit, subject to reasonable rules and regulations, the investigation for, appropriation, storage, and withdrawal of ground water, surface water, and lake, stream, and river water from the recreation area and the conveyance thereof outside the boundaries of the recreation area for beneficial use in accordance with applicable laws of the United States and of the State of Oregon if permission therefor has been obtained from the State of Oregon before the effective date of this Act: *Provided*, That nothing herein shall prohibit or authorize the prohibition of the use of water from Tahkenitch or Siltcoo Lakes in accordance with permission granted by the State of Oregon prior to the effective date hereof in connection with certain industrial plants developed or being developed at or near Gardiner, Oregon. Water utilization.

(b) The Secretary is authorized and directed, subject to applicable water quality standards now or hereafter established, to permit, subject to reasonable rules and regulations, transportation and storage in pipelines within and through the recreation area of domestic and industrial wastes in accordance with applicable laws of the United States and of the State of Oregon if permission therefor has been obtained from the State of Oregon before the effective date of this Act. Waste disposal.

(c) The Secretary is further authorized, subject to applicable water quality standards now or hereafter established, to grant such additional easements and rights, in terms up to perpetuity, as in his judgment would be appropriate and desirable for the effective use of the rights to water and the disposal of waste provided for herein and for other utility and private purposes if permission therefor has been obtained from the State of Oregon, subject to such reasonable terms and conditions as he deems necessary for the protection of the scenic, scientific, historic, and recreational features of the recreation area. Additional easements and rights.

SEC. 12. (a) The Secretary shall establish an advisory council for the Oregon Dunes National Recreation Area, and shall consult on a periodic and regular basis with such council with respect to matters relating to management and development of the recreation area. The members of the advisory council, who shall not exceed fifteen in number, shall serve for individual staggered terms of three years each and shall be appointed by the Secretary as follows: Advisory council, Establishment, Membership.

(i) a member to represent each county in which a portion of the recreation area is located, each such appointee to be designated by the respective governing body of the county involved;

(ii) a member appointed to represent the State of Oregon, who shall be designated by the Governor of Oregon;

(iii) not to exceed eleven members appointed by the Secretary from among persons who, individually or through association with national or local organizations, have an interest in the administration of the recreation area; and

(iv) the Secretary shall designate one member to be Chairman and shall fill vacancies in the same manner as the original appointment.

(b) The Secretary shall, in addition to his consultation with the advisory council, seek the views of other private groups and individuals with respect to administration of the recreation area.

(c) The members shall not receive any compensation for their services as members of the council, as such, but the Secretary is authorized to pay expenses reasonably incurred by the council in carrying out its responsibilities.

Area review;
report to
President.

SEC. 13. Within three years from the date of enactment of this Act, the Secretary shall review the area within the boundaries of the recreation area and shall report to the President, in accordance with subsections 3(b) and 3(d) of the Wilderness Act (78 Stat. 890; 16 U.S.C. 1132(b) and (d)), his recommendation as to the suitability or nonsuitability of any area within the recreation area for preservation as a wilderness, and any designation of any such area as a wilderness shall be accomplished in accordance with said subsection of the Wilderness Act.

Federal-State
cooperation,

SEC. 14. The Secretary shall cooperate with the State of Oregon or any political subdivision thereof in the administration of the recreation area and in the administration and protection of lands within or adjacent to the recreation area owned or controlled by the State or political subdivision thereof. Nothing in this Act shall deprive the State of Oregon or any political subdivision thereof of its right to exercise civil and criminal jurisdiction within the recreation area consistent with the provisions of this Act, or of its right to tax persons, corporations, franchises, or other non-Federal property, including mineral or other interests, in or on lands or waters within the recreation area.

Appropriation.

SEC. 15. Money appropriated from the Land and Water Conservation Fund shall be available for the acquisition of lands, waters, and interests therein within the recreation area, but not more than \$2,500,000 is authorized to be appropriated for such purposes. For development of the recreation area, not more than \$12,700,000 is authorized to be appropriated.

Approved March 23, 1972.

LEGISLATIVE HISTORY:

HOUSE REPORT No. 92-894 accompanying H.R. 8763 (Comm. on Interior and Insular Affairs).

SENATE REPORT No. 92-422 (Comm. on Interior and Insular Affairs).

CONGRESSIONAL RECORD:

Vol. 117 (1971): Nov. 4, considered and passed Senate.

Vol. 118 (1972): Mar. 5, considered and passed House, amended, in lieu of H.R. 8763.

Mar. 14, Senate concurred in House amendment.

WEEKLY COMPILATION OF PRESIDENTIAL DOCUMENTS, Vol. 8, No. 13:

Mar. 24, Presidential statement.

APPENDIX II

OBJECTIVES AND POLICY PROVIDED BY PUBLIC LAW 92-260

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1. The administration, protection and development of the recreation areas will be by the Secretary of Agriculture in accordance with the laws, rules and regulations applicable to the National Forests in such manner as to accomplish the overall purposes stated in Public Law 92-260.
2. The "Inland Sector" composed of public and private lands, is a part of the National Recreation Area, and is to serve as a buffer in order to promote such management and use of the lands, waters and other properties, as will best protect the values which contribute to the purposes of the National Recreation Area.
3. Although all other Federal properties have been transferred to the Forest Service, lands formerly administered by the U. S. Coast Guard and the U. S. Corps of Engineers may continue to be used to the extent required.
4. Within the Inland Sector, the following classes of private property may only be acquired from willing sellers:
 - a. Improved Property - A detached, one-family non-commercial residential dwelling, the construction of which was begun before December 31, 1970, together with accessory structures and the land necessary for the enjoyment of the dwelling.

Owners of improved property may reserve, as a condition of acquisition, the right of use and occupancy of the house and up to three acres of land for a term ending at death of the owner or spouse or for up to 25 years.
 - b. Commercial or industrial property if the purposes are the same which were in use on December 31, 1970, or have been certified by the Secretary or his designee as compatible with or furthering the purposes of the Act.
 - c. Timberlands under sustained yield management so long as they are being managed under standards no less stringent than comparable National Forest lands. Lands needed for public recreation use, access, or for protection of recreation developments may be purchased without consent. Such acquisition shall minimize to the extent practical the impact on access and sustained yield use of the adjoining lands not acquired.
 - d. Property used on December 31, 1970, for private non-commercial recreational purposes, if any improvements made after the date are certified by the Secretary or his designee as compatible with the purposes of the Act.

5. Any lands or interest within the recreation area owned by the State of Oregon or its political subdivision may be acquired only by exchange or donation.
6. The Southern Pacific Railway right-of-way within the recreation area may only be acquired by consent; easements necessary across the right-of-way for ingress and egress may be condemned.
7. Hunting, fishing and trapping on Federally owned lands and waters within the recreation area shall be permitted in accordance with the laws of the U. S. and the State of Oregon. Zones or periods when these activities may not occur for reasons of public safety, administration or public use and enjoyment may be designated after consultation with the appropriate State Fish and Game Department.
9. Existing ground and surface water utilization projects will continue, subject to reasonable rules and regulations, the laws of the U. S. and the State of Oregon, provided permission has been obtained from the State of Oregon prior to March 23, 1972.
10. The transportation and storage of domestic and industrial waste within and through the recreation area will continue, subject to the existing laws and regulations, the laws of the U. S. and the State of Oregon, provided permission has been obtained from the State of Oregon prior to March 23, 1972.
11. Additional rights to water and the disposal of wastes already provided for may be granted subject to reasonable terms necessary for the protection of scenic, scientific, historical and recreational values, provided permission has been granted by the State of Oregon.
12. The Oregon Dunes National Recreation Area Advisory Council will be consulted with on a regular and periodic basis with matters relating to management and development of the recreation area. The views of other private groups and individuals will be sought with respect to the administration of the area.
13. The area will be reviewed as to the suitability or unsuitability for preservation as wilderness, and a report will be submitted to the President by March 23, 1975. Any designation of such area as wilderness shall be in accordance with the Wilderness Act.
14. The Secretary of Agriculture shall cooperate with the State of Oregon and its political subdivisions in the administration of the recreation area and in the administration and protection of lands within or adjacent to the recreation area owned or controlled by the State of Oregon or its political subdivisions. The State will retain its right to exercise civil and criminal jurisdiction, and its right to taxation of non-federal property within the recreation area.

15. Money appropriated from the Land and Water Conservation Fund shall be available for acquisition of lands, water and interest therein. Appropriations for land acquisition are limited to \$2,500,000. For development of the area, not more than \$12,700,000 is authorized to be appropriated.

For additional information, see Public Law 92-260, Appendix I.

Additional policies have been developed by the Planning Team, the management staff of the Siuslaw National Forest and the Oregon Dunes National Recreation Area. These objectives represent basic management direction for the area:

16. Use of the area will provide for the protection of water quality. In areas of conflict between quantity and quality of water, decisions will favor quality.
17. Protection of critical and unique wildlife habitats and plant communities will be fully considered in the use and management of the recreation area.
18. The shifting sand dunes, freshwater lakes and related plant and animal communities represent a varied and dynamic ecosystem that constitutes the area's prime reasons for establishment as a National Recreation Area. To conserve or maintain these characteristics, the forces of nature will be allowed to operate to the extent necessary and practical to accomplish the primary objectives of the establishing legislation.
19. All private lands in the Dunes Sector will be acquired to make available to the public a continuing recreation, scenic and scientific resource.
20. Fish and game management will continue to be the responsibility of the State of Oregon. Habitat management will be retained by the Forest Service and will be directed to sustain or enhance the resource where suitable and in cooperation with the State of Oregon.
21. Special use permits or easements will be issued only after an environmental analysis report is made. The proposed land uses must be compatible with the intrinsic suitability of the land, State and county planning and zoning, and planned uses of National Forest lands. The area will be protected from non-conforming uses.
22. The development will be planned and the area so managed as to provide for a rounded and satisfying outdoor recreation experience.
23. The numbers of visitors and variety of the recreation activities and uses will be consistent with the resources.

24. The National Recreation Area will generally provide the space and environment for public outdoor recreation. Private enterprise or other agencies will be relied upon to provide many of the appropriate commercial public services necessary to support the recreational use of the area. Restaurants, motels, grocery stores and gas stations, etc., would be located outside the area.
25. Visitor interpretive services to enhance the recreational and educational experience will be provided on or near the area.
26. Opportunities for cooperative participation with other agencies, citizens' organizations and private individuals and companies, where appropriate and desirable, will be given full consideration.
27. Private Inland Sector lands desirable for public recreation and enjoyment, or for the protection of other values, will be protected from incompatible uses through acquisition, conservation easements, cooperative agreements with landowners, and other appropriate means.

APPENDIX III

LIST OF WILDLIFE SPECIES



APPENDIX III

LIST OF WILDLIFE SPECIES

The NRA and offshore waters are inhabited or used by 426 species of wildlife: 247 birds, 85 fish and shellfish, 79 mammals, 12 amphibians and 3 reptiles.

Birds are the most numerous and conspicuous species found on the NRA. Both the number and abundance of species varies with the season. Of the 247 species, 94 reside on the area during the entire year, 49 are summer residents or visitors, 68 are migrants. Because of the overlap in seasonal activity of birds, there are at least 137 different species on the area during any time of the year. The 247 species of birds may be placed in three major groups, aquatic - 118 species; song birds - 108 species; and birds of prey - 21 species.

Common year-long resident birds include the common loon, double-crested cormorant, coot, glaucous-winged gull, western gull, common murre, gray jay, chestnut-backed chickadee, common bushtit, wrentit, robin, purple finch, American goldfinch, Savannah sparrow, white-crowned sparrow, song sparrow and Oregon junco. More rare year-long residents include the western bluebird, yellow-bellied sapsucker, long-eared owl, black oyster catcher, blue grouse, bald eagle, black-crowned night heron and the green heron.

Common summer resident birds include the rufous hummingbird, olive-sided flycatcher, tree swallow, barn swallow, cliff swallow, Swainson's thrush, orange-crowned warbler, Wilson's warbler and the brown-headed cowbird. More rare summer residents include the yellow-breasted chat, hermit warbler, Nashville warbler, warbling vireo, solitary vireo, house wren, purple martin, bank swallow, dusky flycatcher, Sora rail and the brown pelican.

Common winter resident birds include the horned grebe, western grebe, fulmar, whistling swan, pintail, American widgeon, lesser scaup, white-winged scoter, surf scoter, rudy duck, least sandpiper, sanderling, California gull, mew gull, varied thrush and the myrtle warbler. More rare winter resident birds are Anna's hummingbird, rock sandpiper, black turnstone, surfbird, pigeon hawk, rough-legged hawk, harlequin duck, Barrow's goldeneye and the European widgeon.

Common migrant birds that use the NRA on their way through are the sooty shearwater, long-billed dowitcher, western sandpiper, northern phalarope and Bonaparte's gull. More rare are the black tern, Caspian tern, Forster's tern, Wilson phalarope, Baird's sandpiper, pectoral sandpiper, knot, lesser yellowlegs, willet, wandering tattler, solitary sandpiper, long-billed curlew, ruddy turnstone, snow goose, white-fronted goose and the New Zealand shearwater.

There are 83 species of fish present in the waters of the NRA. The greatest numbers are found in the estuaries. Estuaries, depending on their size, salinity, and the season of the year, may be used by as many as 54 species of ocean and bay fish. Nine species of anadromous fish use the ocean and estuaries, freshwater streams and lakes during parts of their life cycles. Streams, lakes and ponds are inhabited by 20 species of freshwater fish. Two species of shellfish, razor clams and softshell clams are present. Scattered beds of razor clams occur on the beach for several miles on each side of the outlet of Threemile Creek. The tidal flats adjacent to the west shore of the Umpqua River contain beds of softshell clams.

Anadromous fish include the Pacific lamprey, white sturgeon, American shad, striped bass, chum salmon, Coho salmon, Chinook salmon, steelhead and cutthroat trout. Bay and ocean fish that may be found within the estuaries are the green sturgeon, Pacific herring, northern anchovy, surf smelt, Pacific tomcod, striped perch, wolf eel, kelp greenling, various sculpins, English sole and the starry flounder. Freshwater fish include the rainbow trout, large mouth bass, black crappie, bluegill, yellow perch, brown bullhead, carp and the large-scale sucker.

A relatively large number of mammals use the NRA. Fifty species of terrestrial mammals are present. Nearly all of these species are residents. The majority of terrestrial mammals are quite secretive and seldom, if ever, seen by people. Four marine animals, California sea lion, Steller's sea lion, and the harbor seal, use the beach, estuaries and ocean immediately adjacent to the NRA. Harbor seals are common resi-

dents. The two species of sea lions are seasonal visitors. On occasion, the rare elephant seal may visit the beaches. In addition, 25 species of marine mammals (whales and dolphins) may be found in offshore waters. Larger land mammals include the black bear, mountain lion, black-tailed deer, Roosevelt elk, coyote, gray fox and bobcat. Common small mammals include the Pacific mole, Townsend chipmunk, chickaree, deer mouse, Townsend vole, Oregon vole and brush rabbit. Rare small mammals include the red tree mouse and the white-footed vole.

The NRA is inhabited by 12 species of amphibians, 8 salamanders, 3 frogs and 1 toad. The frogs inhabit the permanent and temporary water areas. Of the 15 species of salamanders found in Oregon, 8 are found in the NRA. These interesting animals live in the forest litter, rotting logs and in or near water. These species are seldom seen by man.

In contrast to the large numbers of species present in other major wildlife groups, only 3 species of reptiles are found in the area. The common garter snake, northwestern garter snake and northern alligator-lizard are relatively abundant on most of the area.

The 426 species of wildlife found in the NRA use 26 habitats which have been differentiated on the basis of vegetation, location and land form. These habitats are not independent of each other, but form an integral unit. Each major habitat contains many smaller habitats (micro-habitats) that exhibit differences in soils, moisture, temperature, vegetation, topography, etc. Some habitats are changing rapidly, while others remain relatively static. Plant succession on the deflation plain may go from grasses to scattered shrubs to a dense thicket in less than 25 years. In contrast, the beach remains essentially the same over long periods of time. Each habitat has its own complement of wildlife species. The distribution of a species among the habitats is dependent on the basic requirements of that species. The narrow set of requirements that some species have may only be met in one habitat or micro-habitat.

Of the 26 habitats, 10 are considered critical to wildlife species. A critical habitat is one necessary for the maintenance and well being of an endangered species, or one used by either a diverse number of species or a large number of individuals. The driftwood tangles at the mouths of the estuaries are preferred nesting sites of the snowy plover. During the nesting season, April through June, these are critical habitats. The old growth forest and snag patches are important roosting, perching and nesting sites for the bald eagle, osprey, great horned owl, and red-tailed hawk. The great blue heron also requires large trees for nesting and roosting. The snags also provide nesting cavities for many birds and dens for mammals. The estuaries and salt marsh meadows are the most fertile naturally occurring areas in the world. The nutrients washed down by the streams and brought in by tidal action stimulate the growth of plankton and invertebrate organisms which are at the lower end of the food chain. Freshwater marshes are used by many species as feeding and nesting areas. Riparian vegetation, the shoreline vegetation of lakes and streams, is necessary for many species as nesting sites, food and shelter. This vegetation also helps maintain water quality of streams used by anadromous fish.

PERIPHERAL AND ENDANGERED SPECIES OF WILDLIFE

Found on the Oregon Dunes National Recreation Area

<u>Species</u>	<u>Status*</u>		<u>Period of Use</u>	<u>Habitats Used</u>
	<u>National</u>	<u>State</u>		
Brown Pelican	SU	P	June-Oct.	Ocean, estuaries
Common Egret		P	Sep. - Apr.	Estuaries, marshes rivers, lakes
Bald Eagle		E	Entire year	Estuaries, marshes lakes, snags
Osprey	SU	R	Apr. - Oct.	Estuaries, lakes snags
Pigeon Hawk		E	? - Feb.	Conifer forests
Snowy Plover		R	Entire year	Beach, tidal flats, sand spits
Caspain Tern		R	May, Sep, Oct.	Ocean, estuaries, beach
Purple Martin		SU	Apr. - Sep.	Near water, snags
White-footed Vole		R	Entire year	Stream edge
Elephant Seal		R	Entire year	Beach

*Status

P - Peripheral: A species whose occurrence in Oregon is at the edge of its natural range, and which is rare within Oregon, although not in its range as a whole. Special attention may be necessary to assure retention in the State fauna.

R - Rare: A species that is not presently threatened with extinction, but is in such small numbers through its range in Oregon that it may be endangered if its environment worsens.

E - Endangered: A species whose prospects of survival and reproduction in Oregon are in immediate jeopardy. Its peril may result from one or many causes - loss of habitat or change in habitat, over-exploitation, predation, competition, disease. An endangered species must have help of extinction will probably follow.

SU - Status Unknown: A species suggested as possibly endangered, or peripheral, but about which there is not enough information to determine its status.

Species list from Marshall, 1969; Otterman, 1972; U. S. Department of Interior, Bureau of Sport Fisheries and Wildlife, 1968.

APPENDIX IV

PROPOSED OFF-ROAD VEHICLE USE RESTRICTIONS

FOREST SERVICE, U.S.D.A.

Siuslaw National Forest

PUBLIC NOTICE

Off-Road Vehicle Use Restrictions

Oregon Dunes National Recreation Area

Pursuant to Federal Law (16 U.S.C. 551) and Secretary of Agriculture regulations (36 C.F.R. 251.25 and 36 C.F.R. 295.1-.9), in order to protect and administer the resources and environment, minimize use conflicts, and to promote the safety of all users, within the Oregon Dunes National Recreation Area and that portion of the Siuslaw National Forest lying immediately south of the south boundary of the National Recreation Area, the areas delineated on the attached map, designated _____, and dated _____, and/or posted on the ground are hereby restricted as follows:

- *1. Areas designated by crosshatching ////////////// on the map are open for use by off-road vehicles, subject to the following conditions:
 - a. All open sand areas and dunes are available for cross country travel.
 - b. All vehicles shall stay on established routes:
 - (1) Through vegetated areas.
 - (2) Within 200 feet of any lake, pond, river or stream.
 - (3) Within one-half mile of any area of concentrated public use (campgrounds, picnic grounds, parking lots, etc.).
 - c. Cross country motor vehicle travel is prohibited on existing routes that are visibly closed by barriers, such as gates, posts, logs, or other man-placed controls to discourage entry to the route.
2. Areas not cross hatched on the map are closed to off-road vehicle use.
 - a. Emergency or administrative travel is excepted.
 - b. Hard surfaced roads in areas of concentrated public use is excepted (campgrounds, picnic grounds, beach access roads, parking lots, etc.).

*The crosshatching pertains to a map which will accompany this notice, not to any map contained in this document.

3. These regulations apply to National Forest lands only.
 - a. There are private property owners in the area; please respect their rights.
 - b. Management of State and County lands within the National Recreation Area lie with the respective agency in cooperation with the Forest Service. Please adhere to the rules and regulations set by those agencies for lands under their jurisdiction.

Violators are liable for prosecution under Regulations of the Secretary of Agriculture.

This notice supersedes any previous closure for the Oregon Dunes National Recreation Area and that portion of the Siuslaw National Forest lying immediately south of the south boundary of the National Recreation Area.

Effective date of this notice: _____.

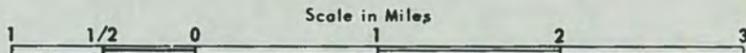
F. DALE ROBERTSON
Forest Supervisor
Siuslaw National Forest

APPENDIX V

INLAND SECTOR AND OWNERSHIP

single

U.S. DEPARTMENT OF AGRICULTURE
 FOREST SERVICE
 JOHN R. McGUIRE, CHIEF
 REGION SIX
 OREGON DUNES
 NATIONAL RECREATION AREA
 SIUSLAW NATIONAL FOREST
 OREGON



- N.R.A. BOUNDARY
- NATIONAL FOREST LANDS WITHIN N.F. BOUNDARY
- NON-NATIONAL FOREST LANDS
- NATIONAL FOREST BOUNDARY INLAND SECTOR

ROAD CLASSIFICATION

- | | | | |
|-------------------|--|----------------|--|
| Paved Road | | Dirt Road | |
| Rock Surface Road | | Primitive Road | |
| U.S. Route | | State Route | |

ALL PROPOSED SITES SHOWN IN PARENTHESES

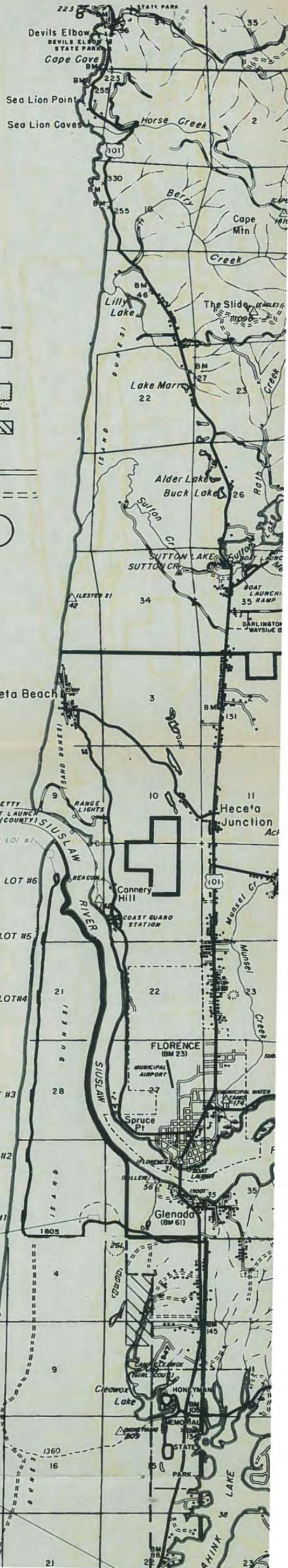
Base Map assembled from USFS Planimetric Series 1968

10,000 foot grid based on state coordinate system, Oregon, north zone and Oregon, south zone.

USFS R-6 1973

05'

55'



SOUTH JETTY AREA

(SOUTH JETTY DUNE PARKING)

(WOAHINK PARKING)

(SILTCOOS LAKE TRAILHEAD)

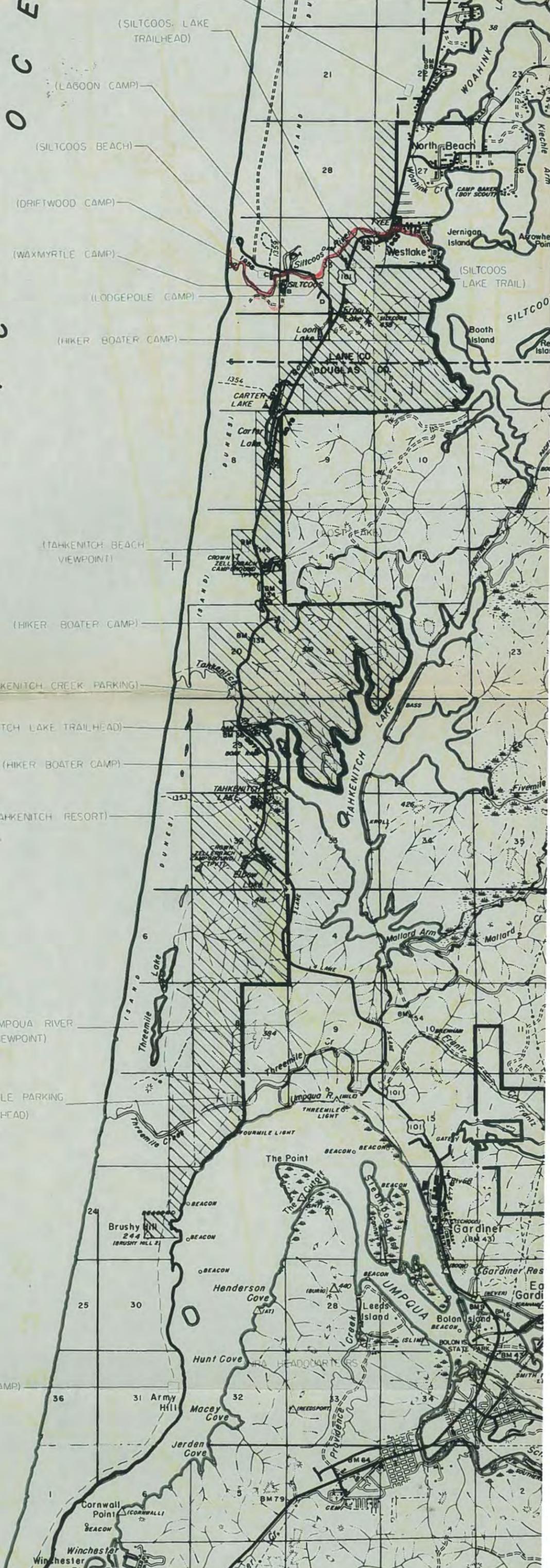
C E A N

55'

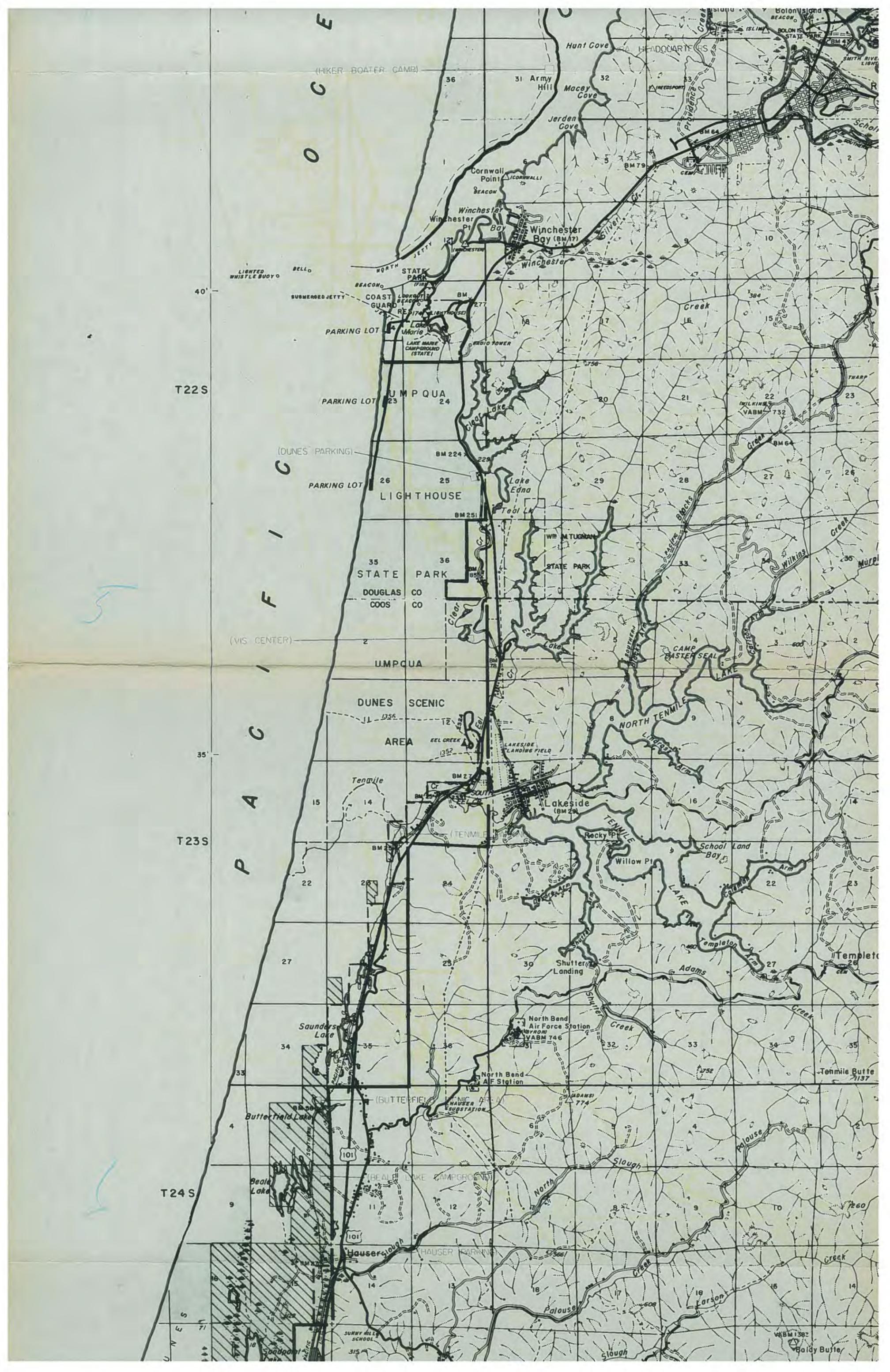
50'

T21S

P A C I F I C O C E A N



4

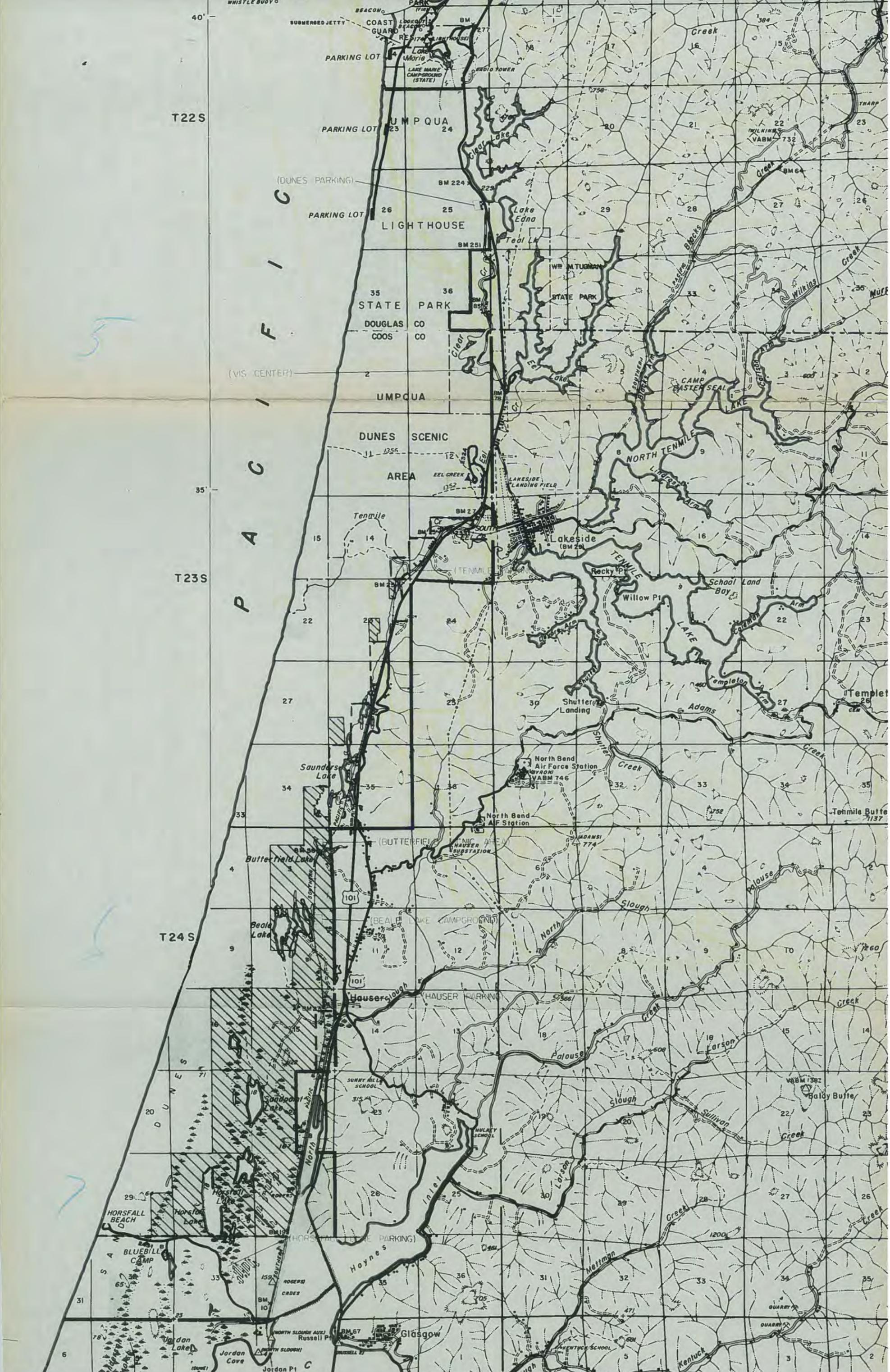


PACIFIC

T22S

T23S

T24S



APPENDIX VI

REPORT ON PROPOSED ACTION

5/11/4

OREGON DUNES NATIONAL RECREATION AREA SUMMARY
PUBLIC RESPONSE - PROPOSED MANAGEMENT PLAN

This summary highlights the main features of the Report on Public Response, Proposed Management Plan, Oregon Dunes National Recreation Area. This report describes the content of 532 written and oral inputs.

Information Gathered

The information obtained from the public and agencies is in the form of general and specific opinions on management philosophy, issues and areas.

Public Input Analysis

The method used in this analysis was the Codinvolve System developed in 1972 by Roger N. Clark and John Hendee, PNW Forest and Range Experiment Station, Seattle, Washington, and George Stankey, Intermountain Experiment Station, Missoula, Montana. The Codinvolve System, basically a method of coding and classifying written inputs with provisions for retrieval, was adapted to the Oregon Dunes National Recreation Area Study.

Form of Input

Inputs concerning the management proposal were received at the formal wilderness hearings and the management plan meetings. In addition, personal letters and petitions were received for a 30 day period after the last meeting. Three newspaper editorials that commented on the management proposal were also included. Eighty-one percent of the inputs were personal letters.

Who Responded?

Sixty-six percent of the responses were from individuals, fifteen percent from formal groups, twelve percent from households, five percent from agencies and two percent from informal groups. Eighty-two percent of the signatures were from formal groups.

Residence of Respondents

Sixty percent of the inputs were from Western Oregon, while twenty-two percent were from the local area. Regional and National inputs accounted for thirteen percent of the response, with the balance of unknown origin. Ninety-two percent of the signatures originated from Western Oregon.

Feelings About the Proposed Management Plan

Two primary issues that surfaced from the public were the amount of development to take place within the area, and the amount of space to be allocated to off-road vehicles.

Forty-six percent of the inputs favored the proposed management plan. Limits on ORV use and developments were cited as reasons for favoring the proposal. Approximately 68% of those that liked the proposal suggested that it be modified to provide for a wilderness classification to guarantee that the proposal wouldn't be subsequently modified to enlarge the ORV areas or to increase developments.

Seven percent of the inputs disagreed with the management proposals. Dissatisfaction with the ORV allocations were the primary reasons for disapproval.

Forty-six percent of the inputs offered other proposals. Eighty-six percent of these inputs expressed dissatisfaction with the proposed ORV allocations and asked that they remain the same as present, be increased from the present or be increased from the proposed allocations. Reasons given for these requests were that ORV's are the major users of the area, ORV's are necessary to use the area, and the area should be open for all to enjoy were the most frequent.

Conclusion

As previously stated, the dominant factors emerging from the public inputs were retention of the area in a natural state and how much area is to be allocated for ORV use. ORV enthusiasts expressed little concern for anything besides the amount of area that they are to have. Those that liked the plan liked it because of proposed ORV restrictions and limited developments. While the sides were nearly even in numbers of inputs, the ORV enthusiasts provided 72% of the signatures supporting their cause. This was due to the fact that they submitted twice the number of signatures on petitions.

REPORT ON PUBLIC RESPONSE
PROPOSED MANAGEMENT PLAN
OREGON DUNES NATIONAL RECREATION AREA

The following report describes the content of 532 oral and written inputs received by the U. S. Forest Service in response to the proposed Management Plan of the Oregon Dunes National Recreation Area. The inputs were received at two public meetings held in November of 1974 concerning the proposal, as well as written input received for a 30 day period after the meetings. In addition, any oral testimony received at the formal wilderness hearings which referred to the management proposal was also included.

The questions discussed in this report are: (1) What type of information was gathered in the public involvement process? (2) How were the inputs analysed and displayed? (3) What was the nature and extent of the inputs? (4) What did the inputs say? About the management proposal? About other proposals? About modifications? (5) What other comments were given?

I. WHAT TYPE OF INFORMATION WAS GATHERED?

The information obtained in the form of oral and written responses was in the form of general and specific opinions concerning the proposed management plan, suggested modifications and other proposals.

The response period was of 30 days duration after the last public meeting on November 15, 1974.

II. HOW WAS IT ANALYSED AND DISPLAYED?

The Codinvolve System involved the following steps to complete the analysis:

- (1) Receive, date and assign a sequence number to the written input.
- (2) Read and code the written inputs. This phase took approximately 10 person days. Information was coded onto keysort cards.
- (3) Hand sort quantitative and qualitative data - approve - disapprove management proposal, reasons given, other proposals and supportive reasons.
- (4) Complete the analysis - attach reasons and sentiment - trends and implications.

Coder reliability checks indicated an average reliability of 90-95% accuracy. Nearly all coding errors showed up during the sorting and were corrected.

The format used to display data will show number of inputs unless otherwise specified. Where specified, it will show number of inputs (I) and number of signatures (S).

III. WHAT WAS THE NATURE AND EXTENT OF THE INPUTS?

A. Form of Response

The majority of the inputs (81%) were in the form of personal letters. The management plan meeting contributed eight percent of the inputs, while six percent were given orally at the wilderness hearing. Four percent of the inputs were in the form of petitions. The petitions accounted for 93% of the signatures. Three editorials that took a position on the management plan were also included in the inputs.

<u>Form of Response</u>		<u>Number</u>	<u>Percent</u>
Wilderness	(I)	34	6.4
Hearing	(S)	34	0.4
Management Plan	(I)	42	7.9
Meeting	(S)	42	0.5
Letters	(I)	431	81.0
	(S)	529	5.9
Petitions	(I)	22	4.1
	(S)	8284	93.2
Editorials	(I)	3	0.6
	(S)	0	0.0
Total	(I)	532	100.0
	(S)	8889	100.0

B. Who Responded?

The majority (66%) of the inputs were from individuals, with formal groups submitting 15% and households accounting for 12%. Formal groups accounted for eighty-two percent of the signatures.

<u>Respondent</u>		<u>Number</u>	<u>Percent</u>
Individuals	(I)	352	66.2
	(S)	348	3.9
Households	(I)	62	11.7
	(S)	123	1.4
Informal Groups	(I)	13	2.4
	(S)	1086	12.2
Formal Groups	(I)	78	14.7
	(S)	7305	82.2
Agencies	(I)	27	5.1
	(S)	27	0.3
Total	(I)	532	100.0
	(S)	8889	100.0

Households were inputs submitted on behalf of a family.

Informal groups were inputs referring to "my friends and I", or were a group that was neither a household, organization or agency.

Formal groups include inputs submitted on behalf of an organization. This could be a club or company.

Agencies include Federal, State, County and City governments or their subdivisions.

C. Where the Response Was From

The majority of the inputs originated from Western Oregon (60%). Local input accounted for twenty-two percent of the inputs. Ninety-two percent of the signatures were from Western Oregon.

<u>Residence</u>		<u>Number</u>	<u>Percent</u>
Local	(I)	119	22.4
	(S)	512	5.8
Western Oregon	(I)	321	60.3
	(S)	8212	92.4
Regional	(I)	40	7.5
	(S)	101	1.1
National	(I)	26	4.9
	(S)	29	0.3
Unknown	(I)	26	4.9
	(S)	35	0.4
Total	(I)	532	100.0
	(S)	8889	100.0

Local area is defined as Western Lane, Western Douglas and Coos Counties.

Western Oregon is that area west of the Cascade Range and excluding the local area.

Regional is Washington, Eastern Oregon, and Northern California.

National includes all areas within the United States not previously mentioned.

IV. WHAT DID THE PUBLIC SAY ABOUT THE PROPOSED MANAGEMENT PLAN?

The major goal of the public involvement process for the management plan was to find out how the public and agencies felt about the proposal. Public meetings were held in Salem and Reedsport, Oregon, to receive these comments. In addition, written comments were invited for a period of 30 days.

A. What Was the General Feeling About the Proposed Management Plan?

Nearly forty-six percent of the inputs stated support for the management proposal. Seven percent stated definite opposition to it. Forty percent of the inputs offered other proposals. While many of the other proposals may be considered as modifications of the proposed plan, they were coded as other proposals because they did not state a preference for or against the plan; or the respondent introduced the input as another proposal. Fifty-three percent of the signatures supported other proposals, while twenty-seven percent of the signatures were in favor of the Forest Service proposal. Seven percent of the inputs were opposed to the Forest Service proposal, with twenty percent of the signatures opposing it.

1. Form of Input

		Wilderness Management					Total	Percent
		Hearing	Plan Mtg.	Letters	Petitions	Editorials		
Approval of Management Plan	(I)	20	12	204	6	2	244	45.9
	(S)	20	12	221	2131	0	2384	26.8
Disapproval of Management Plan	(I)	1	6	23	5	0	35	6.6
	(S)	1	6	27	1728	0	1762	19.8
Other Proposals	(I)	8	19	176	11	1	215	40.4
	(S)	8	19	253	4425	0	4705	53.0
Other Considerations & Comments	(I)	5	5	28	0	0	38	7.1
	(S)	5	5	28	0	0	38	0.4
Total	(I)	34	42	431	22	3	532	100.0
	(S)	34	42	529	8284	0	8889	100.0

2. Who Responded?

		<u>Indi- vidual</u>	<u>House- holds</u>	<u>Informal Groups</u>	<u>Formal Groups</u>	<u>Agencies</u>	<u>Total</u>	<u>Percent</u>
Approval of Management Plan	(I)	173	21	3	37	10	244	45.9
	(S)	173	36	281	1884	10	2384	26.8
Disapprove of Management Plan	(I)	18	5	2	10	0	35	6.6
	(S)	18	10	109	1625	0	1762	19.8
Other Pro- posals	(I)	146	36	8	23	2	215	40.4
	(S)	142	77	696	3788	2	4705	53.0
Other Consider- ations & Com- ments	(I)	15	0	0	8	15	38	7.1
	(S)	15	0	0	8	15	38	0.4
Total	(I)	352	62	13	78	27	532	100.0
	(S)	348	123	1086	7305	27	8889	100.0

3. Location

		<u>Local</u>	<u>Western Oregon</u>	<u>Regional</u>	<u>National</u>	<u>Unknown</u>	<u>Total</u>	<u>Percent</u>
Approval of Management Plan	(I)	49	157	25	10	3	244	45.9
	(S)	50	2292	28	10	4	2384	26.8
Disapprove of Management Plan	(I)	17	14	2	0	2	35	6.6
	(S)	18	1738	3	0	3	1762	19.8
Other Pro- posals	(I)	46	128	8	12	21	215	40.4
	(S)	437	4160	65	15	28	4705	53.0
Other Consid- erations and Comments	(I)	7	22	5	4	0	38	7.1
	(S)	7	22	5	4	0	38	0.4
Total	(I)	119	321	40	26	26	532	100.0
	(S)	512	8212	101	29	35	8889	100.0

B. Specific Information Concerning Agreement With the Proposed Management Plan

1. Approximately 22% of those inputs approving the plan favored it without modifications. The remaining 78% of those approving the plan suggested that it be modified.

a. Form of Input

		Wilderness Management					
		Hearing	Meeting	Letters	Petitions	Editorials	Total
Proposed Plan	(I)	9	2	41	0	1	53
As Is	(S)	9	2	44	0	0	55
Proposed Plan	(I)	11	10	163	6	1	191
With Modifica-	(S)	11	10	177	2131	0	2329
cations							
Total Proposed	(I)	20	12	204	6	2	244
Plan	(S)	20	12	221	2131	0	2384

b. Who

		Individual	Household	Informal Group	Formal Group	Agencies	Total
Proposed Plan	(I)	25	4	0	20	4	53
As Is	(S)	25	7	0	19	4	55
Proposed Plan	(I)	148	17	3	17	6	191
With Modifica-	(S)	148	29	281	1865	6	2329
cations							
Total	(I)	173	21	3	37	10	244
	(S)	173	36	281	1884	10	2384

c. Location

		Local	Western Oregon	Regional	National	Unknown	Total
Proposed Plan	(I)	26	21	1	4	1	53
As Is	(S)	26	22	1	4	2	55
Proposed Plan	(I)	23	136	24	6	2	191
With Modifica-	(S)	24	2270	27	6	2	2329
cations							
Total	(I)	49	157	25	10	3	244
	(S)	50	2292	28	10	4	2384

2. Reasons for agreeing with the proposed management plan (I) 244 (S) 2384

Over one-half of the inputs supporting the proposed management plan gave no reasons why they supported it. Those that supported it stated such reasons as limitations on ORV's, limited development, and meeting public needs, while balancing use with protection of the area as the major reasons.

No reasons given (I) 128 (S) 2265
Proposal limits ORV to adequate areas (48)
Provides limited development of facilities (24)
Meets public needs, while providing balance between recreation and resource protection (23)
Provides for updating plan with public involvement to meet changing needs (15)
Like peripheral development concept (6)
Has no new roads to ocean (6)
Protects wildlife and habitat (6)
Like visitor center (3)
Like trails (3)
Allows commercial ORV's to provide for elderly (2)
Agree with permitted uses of private lands (2)

3. Modifications suggested to the proposed plan (I) 191 (s) 2329

Provide a wilderness (I) 167 (S) 2304
Ban ORV's (15)
Phase out ORV's (7)
Ban hunting (4)
Further reduce ORV areas (3)
Don't pave Threemile Road (3)
Build Tenmile Road to beach (2)
Build Threemile and Tahkenitch Roads (2)
Don't close Umpqua Lighthouse State Park to ORV (2)
Provide for on-going public input (2)
Do not allow ORV corridors on Umpqua Spit (2)
Allocate ORV-hiker areas based on demand
Allow ORV only in ORV areas - hikers only in hiker areas
Ban ORV's on beach from 1/4 mile north of Siltcoos River to 1/4 mile south of Tenmile Creek
Close dunes to ORV from Cleawox outlet to Siltcoos River - open area from Siltcoos to Umpqua
Ban ORV south of Tenmile also
Allow ORV's in proposed closed areas from Siltcoos River to Tenmile Creek
Allow ORV's in all areas
Allow more area for ORV's
Keep beaches open to ORV all year
Provide more access points for ORV's
Build new ORV camp near Waxmyrtle Campground
Keep Tyee Camp for fishermen - not bicyclers
Provide campground near Tahkenitch outlet
Provide more hiker camps in future

3. Modifications suggested (cont.)

Provide more access roads
Remove road in Umpqua Lighthouse State Park within NRA
Remove Threemile Road
Remove parking lots in Umpqua Lighthouse State Park within NRA
Allow only five parking lots on South Jetty Road
Provide more adequate protection to private landowners
Adjust NRA boundary at Saunders Lake
Trade lands east of railroad for lands below south boundary
Consider research natural areas if no wilderness is proposed
Provide positive management of snags for birds

C. Specific Information Concerning Disagreement With the Proposed Plan

1. Reasons for expressing disagreement with the proposed plan (I) 35 (S) 1762

Major reasons for disagreeing with the proposed management plan centered around the ORV closures:

Need more area for ORV's than proposed (6)
Should be no ORV closures (5)
Concentrates ORV's into too small of area - damage and conflict will result (5)
ORV's could help solve beachgrass problem (4)
Proposal discriminates against ORV people (2)
Discriminates against elderly, invalids and young - ORV's are necessary for them to enjoy area (2)
Private lands are subject to closure to ORV (2)
Need more ORV facilities
Opposed to closing 45% of the 85% of the NRA to ORV's
Closures would ruin ORV sport
Open sand should be open
Area is too hard to walk in
Proposal leaves no dunes open in Douglas County to ORV
Would eliminate search and rescue by ORV
Tourists depend on ORV's to enjoy area
Users depend on ORV's for recreation
ORV's have only 1% of the land that backpackers have in Oregon
Have a lot of money tied up in ORV's
Under the proposal, hikers and ORV's would conflict
Restricting ORV to such a small area would result in closing entire area eventually
ORV's use the area all year - hikers only during summer
90% of use is by ORV's
Need additional parking at Hauser
Horsfall is a hoodlum area - should be closed

1. Reasons for expressing disagreement (cont.)

Additional developments would bring in more litter and people
Need more parking areas
Need more camping areas
Need more roads
Proposed facilities would require additional sand stabilization
Influx of hunters would endanger wildlife and humans
Allows private lands to remain - should be condemned
Government should either own private land or come forth with a management plan

2. Most of the inputs that disagreed with the management proposal offered other proposals also. These proposals are combined with the previous Other Proposals in the following section and analysed.

D. Specific Information Concerning Other Proposals to the Management Plan

While most of the "Other Proposals" are actually modifications of the management plan, they are listed as "Other Proposals" because the respondent introduced them as other proposals or alternatives, or did not mention the management plan. Such phrases as "I disagree with the management plan and offer another alternative to it" or "I propose that...", while not mentioning the proposed plan, gave cause to code them as "Other Proposals".

1. Form of Input

		Wilderness Management					
		<u>Hearing</u>	<u>Plan Mtg.</u>	<u>Letters</u>	<u>Petitions</u>	<u>Editorials</u>	<u>Total</u>
Sand Dunes	(I)	1	12	21	1	0	35
Common Cause	(S)	1	12	26	668	0	707
Keep ORV	(I)	4	7	101	9	0	121
Areas As Is	(S)	4	7	122	603	0	736
Allow ORV	(I)	0	0	3	0	0	3
on Open Sand	(S)	0	0	4	0	0	4
Don't Close	(I)	1	3	16	0	0	20
so Much to ORV	(S)	1	3	61	0	0	65
Opposed to	(I)	0	1	1	5	0	7
Proposed	(S)	0	1	1	4874	0	4876
Closures							
Ban ORV's	(I)	0	0	13	0	0	13
	(S)	0	0	16	0	0	16
Restrict ORV's	(I)	2	0	14	0	1	17
	(S)	2	0	16	0	0	18
Leave Area	(I)	0	0	12	0	0	12
in Primitive	(S)	0	0	14	0	0	14
State							
Miscellaneous	(I)	0	1	13	1	0	15
Proposals	(S)	0	1	16	8	0	25
Total	(I)	8	24	194	16	1	243
	(S)	8	24	276	6153	0	6461

2. Who Responded?

		<u>Individual</u>	<u>Household</u>	<u>Informal Group</u>	<u>Formal Group</u>	<u>Agencies</u>	<u>Total</u>
Sand Dunes	(I)	13	6	0	16	0	35
Common Cause	(S)	13	11	0	683	0	707
Keep ORV	(I)	91	17	6	7	0	121
Area As Is	(S)	88	41	500	107	0	736
Allow ORV's	(I)	2	1	0	0	0	3
on Open Sand	(S)	2	2	0	0	0	4
Don't Close	(I)	13	5	0	2	0	20
So Much to	(S)	13	10	0	42	0	65
ORV							
Opposed to	(I)	1	0	3	3	0	7
Proposed	(S)	1	0	297	4578	0	4876
Closures							
Ban ORV's	(I)	10	3	0	0	0	13
	(S)	10	6	0	0	0	16
Restrict	(I)	12	3	0	2	0	17
ORV's	(S)	12	5	0	1	0	18
Leave Area	(I)	8	4	0	0	0	12
in Primitive	(S)	7	7	0	0	0	14
State							
Miscellaneous	(I)	10	2	1	0	2	15
Proposals	(S)	10	5	8	0	2	25
Totals	(I)						243
	(S)						6461

3. Location

		<u>Local</u>	<u>Western Oregon</u>	<u>Regional</u>	<u>National</u>	<u>Unknown</u>	<u>Total</u>
Sand Dunes	(I)	10	22	2	0	1	35
Common Cause	(S)	11	692	3	0	1	707
Keep ORV Areas As Is	(I)	30	69	2	2	18	121
	(S)	368	284	56	2	26	736
Allow ORV's on Open Sand	(I)	1	1	1	0	0	3
	(S)	1	1	2	0	0	4
Don't Close so Much to ORV	(I)	9	7	1	0	3	20
	(S)	51	9	1	0	4	65
Opposed to Proposed Closures	(I)	2	5	0	0	0	7
	(S)	2	4874	0	0	0	4876
Ban ORV's	(I)	2	5	2	4	0	13
	(S)	2	5	3	6	0	16
Restrict ORV's	(I)	2	14	0	1	0	17
	(S)	4	13	0	1	0	18
Leave Area in Primitive State	(I)	0	7	1	3	1	12
	(S)	0	8	2	4	0	14
Miscellaneous Proposals	(I)	4	9	0	2	0	15
	(S)	13	10	0	2	0	25
Totals	(I)						243
	(S)						6461

4. Reasons Given for Other Proposals

a. Sand Dunes Common Cause (I) 35 (S) 707

No reasons given (I) 8 (S) 675

Common Cause provides camps for ORV with sand access (8)

ORV's need large area to prevent overuse (7)

ORV's have most of the use in the dunes so should have most of the area (6)

Common Cause is more fair to ORV's (4)

ORV's need more area to prevent safety problems (3)

Common Cause would give ORV's more of the public lands rather than the private lands (3)

ORV's have equal rights to the area (2)

ORV's are needed for the elderly to enjoy (2)

a. Sand Duners Common Cause (cont.)

ORV's are necessary for other sports (2)
Would be foolish to allow ORV's in Honeyman area (2)
Area should be open for all to enjoy (2)
Should have multiple use of public lands
People come from other states to enjoy ORV's
Common Cause leaves other areas for pedestrians
ORV's are a pleasure
Area is inaccessible without ORV's
The sand is too hard to walk on

b. Keep ORV Areas As Is (I) 121 (S) 736

No reasons given (I) 44 (S) 554
The area should be open for all to enjoy (21)
ORV's don't harm area (16)
ORV sports are family fun (13)
Hikers don't use the area (9)
ORV's pack out litter (8)
ORV's are needed for elderly, handicapped and very
young to enjoy the area (8)
Can only see the area with ORV's (7)
ORV's have a right to use the area (7)
Area shouldn't be closed for just a minority of
people (6)
Sand is too hard to walk on (6)
More people can enjoy the area if ORV's are allowed
(3)
If ORV's are confined to smaller areas, they will
cause overuse (3)
ORV's don't conflict with wildlife (3)
Father builds dune buggies, so keep areas open for
them (2)
Present situation is a fair compromise between ORV
use and conservationists (2)
Have a lot of money tied up in ORV hobbies (2)
Too many areas are closed to ORV's now (2)
Need ORV's to cut wood on beaches
ORV's necessary for search and rescue work
Enjoy seeing ORV's playing in area
ORV's have only 1% of the area that hikers have in
Oregon
Hikers can go to other areas - ORV's can't
Grass will spread without ORV's

c. Allow ORV's on Open Sand (I) 3 (S) 4

No reasons given (I) 1 (S) 1
Hikers don't use the area (2)
Each time the wind blows the ORV tracks are gone

d. Don't Close So Much to ORV's (I) 20 (S) 65

No reasons given (I) 6 (S) 8

Areas won't be used if closed to ORV's (4)

If ORV's restrained to smaller areas, it would cause overuse (4)

Large part of public using the area have ORV's (4)

Half for hikers and half for ORV's would be fine (2)

ORV's provide for family recreation (2)

ORV's have equal rights

ORV's allow everyone to enjoy

ORV's have nowhere else to go

No dunes would be open in Douglas County

ORV's needed for search and rescue

Specifically mentioned:

All suitable areas should be open to ORV's

Area north of the Umpqua should also be opened

Open all areas except for 1/2 mile buffer around developments

Keep beaches open in addition

Keep areas south of Siltcoos and Umpqua Lighthouse State Park open in addition to proposal

Close only areas 1/2 mile around parking lots in summer

Keep area south of Florence open

Open all except 1/4 mile buffers around camps

Allow ORV's south of Siltcoos also

Open South Jetty area to ORV's also

Allow ORV's from Siltcoos to Tenmile also

e. Opposed to Proposed Closures (I) 7 (S) 4876

No reasons given (I) 5 (S) 4874

Need ORV's for tourists to enjoy area

Closures to ORV's would eventually lead to closures to horses and dogs

f. Ban ORV's (I) 13 (S) 16

No reasons given (I) 6 (S) 8

ORV's damage the ecology of the area (3)

ORV's disturb other users (2)

ORV's disturb wildlife (2)

ORV's destroy solitude

ORV's are dangerous to hikers

ORV's pollute the area

ORV's don't obey restrictions, so ban them

g. Restrict ORV's (I) 17 (S) 18

No reasons given (I) 8 (S) 9
ORV's damage the area (6)
ORV's and foot traffic constitute a dangerous conflicting use (2)
ORV's distract from beauty of area
ORV's destroy solitude of area
ORV's waste petroleum
ORV's litter the area

h. Leave Area in a Primitive State (I) 12 (S) 14

No reasons given (I) 1 (S) 2
Would preserve area for future generations (5)
ORV's damage the area (2)
Exploitation has caused enough problems already
Need unspoiled areas
Inaccessibility is a boon to nature lovers
Shouldn't be able to drive to every acre
ORV's disturb other users
Most visitors don't own ORV's anyway
ORV's are difficult to regulate
ORV's are dangerous to other users
Area has unique beauty

i. Miscellaneous Proposals (I) 15 (S) 25

Prefer Alternative C
Change boundary to exclude Hauser (2)
Prefer Alternative A (2)
Develop area outside of proposed wilderness
Classify as "Backcountry" area from Siltcoos-Tenmile
Keep boat ramps at Siltcoos and Tahkenitch Lake
Don't provide ORV corridors on Umpqua Spit
Keep Tyee Camp open for fisherman
Condemn private lands
Provide more camping facilities
Provide a small research natural area and restrict everyone
Don't have any roads in NRA
Provide a group camp
Provide minimum development limited to trails, parking and rest areas
Allow utilization of water for nearby communities
Allow ORV's only in designated areas if compatible environmentally
Provide for ORV access from camps to the dunes
Expand NRA to 50,000 - 80,000 acres
Should classify area as an NRA

D. Other Considerations and Comments 1/ (I) 45 (S) 44

Comments on Draft Environmental Statement (16)
No comments on Draft Environmental Statement (3)
ORV's damage the area (2)
Proposed closures would ruin ORV sport
ORV's could solve beachgrass problem
Fun to play in sand with ORV's
ORV's do not damage area
Areas left open not good for ORV's
ORV's are dangerous to humans
Proposed plan is unjust and selfish
Why would anyone want to hike in dunes?
Proposed plan will bring in hordes of people
Proposed facilities will require additional stabilization
Proposed plan will ruin solitude of area
Proposed is fair to only 10% of the people
Forest Service should take a hard look at area south of Ten-mile (due to other uses) instead of battling people of the area
Assess impacts before allowing ORV's in bigger areas
Dunes NRA is the only common sense thing to do
Support 18,100 acre NRA
Pleased with provisions for an Oregon Coast Trail
Common Cause may become a special interest group and taxed as a concessionaire
Protection of water is pre-eminant
Proposed plan will destroy uniqueness of area
Save Oregon Coast for Oregonians
Area needs to be managed or it won't survive
Production from Coos Bay - North Bend Water Board must not be jeopardized
Forest Service should consider private owners who do not have the same freedom as other landowners, yet pay taxes
Recreation is important to the economy of the area
Advisory Council, Forest Service and the landowners must cooperate
All people should get the benefits of the area
There should be no zoning in the dunes
What is or is not compatible uses of private land was decided without the benefits of hearings
Leave it up to the Forest Service to decide
Should have an NRA created under the provisions of the Wilderness Act

1/ Includes 7 inputs that disagreed with proposed management plan, but did not offer other proposals.

V. SUMMARY OF PROPOSALS

	<u>(I)</u>	<u>Percent</u>	<u>(S)</u>	<u>Percent</u>
Pro Management Plan	53	10.1	55	0.6
Pro Management Plan With Modifications	191	35.9	2329	26.2
Sand Dunes Common Cause	35	6.6	707	8.0
Keep ORV Areas As Is	121	22.7	736	8.3
Allow ORV's on Open Sand	3	0.6	4	(0.04)
Don't Close So Much Area to ORV's	20	3.8	65	0.7
Opposed to Proposed Closures	7	1.3	4876	54.9
Ban ORV's	13	2.4	16	0.2
Restrict ORV's	17	3.2	18	0.2
Leave Area in a Primitive State	12	2.2	14	0.1
Miscellaneous Proposals	15	2.8	25	0.3
Other Comments and Considerations	<u>45</u>	<u>5.4</u>	<u>44</u>	<u>0.5</u>
Totals	532	100.0	8889	100.0

VI. CONCLUSION

The Oregon Dunes National Recreation Area was created by Act of Congress to: (1) Provide for public outdoor recreation and (2) Conserve the scenic, scientific, historic and other values contributing to the enjoyment of the area.

The Forest Service submitted a proposed management plan to the public for review at public meetings in Salem and Reedsport, Oregon, on November 12 and 15, 1974. The record was kept open until December 15, 1974 to receive written comments.

Of the many issues considered in the management proposal, two were of such immense concern to the public that they overshadowed all others - the amount of development and the amount of area to be allocated to off-road vehicles.

Many inputs did not address themselves to the proposed management plan at all. They addressed the wilderness issue alone and are analysed in a separate report entitled "Report on Public Response, Wilderness Suitability, Oregon Dunes National Recreation Area".

Forty-six percent of the inputs favored the proposed management plan. Limiting the use of ORV's, limiting the amount of development and providing for a balance between use and protection of the area were the principal reasons for favoring the management plan. Thirty-five percent of the total inputs, while favoring the proposal, suggested that it be modified. The majority of the modifications were to provide a wilderness within the area. This was seen as the best means to limit development and ORV use of the area.

Seven percent of the inputs voiced disapproval with the management plan. The proposed ORV closures were the major reasons given for disapproval. Most of the inputs that disagreed with the management proposal offered other proposals.

Forty-six percent of the inputs offered other proposals to the management plan. Of the total inputs, 35% offered other proposals that would increase or maintain the amount of area currently used or proposed for use by ORV's. Such reasons as ORV's have the most use of the area, ORV's are necessary to enjoy the area, ORV's have equal rights, everyone should be allowed to use the area, were the most frequent reasons given for requesting increases in the ORV allocation.

Three percent of the inputs asked that ORV's be restricted, without expressing approval or disapproval of the management plan. Two percent of the inputs asked that the area be managed in a primitive or natural state. Three percent offered various other proposals.

APPENDIX VII

COPIES OF PUBLIC RESPONSE TO DRAFT ENVIRONMENTAL STATEMENT



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
 ARCADE PLAZA BUILDING, 1321 SECOND AVENUE
 SEATTLE, WASHINGTON 98101
 December 3, 1974

1

RECEIVED
 NOV 27 1974
 107

REGION X
 Office of
 Regional Administrator

IN REPLY REFER TO:

10S

Mr. Robert R. Tyrrel, Acting Regional Forester
 USDA Forest Service
 P.O. Box 3623
 Portland, Oregon 97208

Action
 Infor.

Dear Mr. Tyrrel:

WRB ___
 GWS ___
 PAK ___
 DEB ___
 LDH ___
 CLS ___
 DGT ___
 HRB ___
 WAP ___
 EEW ___
 JHN ___
 JFS ___
 LWR ___
 MFH *mt*

Subject: Draft Environmental Statement
 Management Plan
 Oregon Dunes National Recreation Area

We have reviewed the draft statement submitted with your October 2, 1974 letter requesting comments by December 15.

The proposed action is the development of a plan for the management of lands within the Oregon Dunes National Recreation Area, Siuslaw National Forest in the State of Oregon, Counties of Lane, Douglas and Coos.

We find no objections to your management plan from the standpoint of our areas of concern.

Thank you for the opportunity to comment.

Sincerely,

James L. Young
 James L. Young
 Regional Administrator

UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE

1218 S. W. Washington Street, Portland, Oregon 97205

November 18, 1974

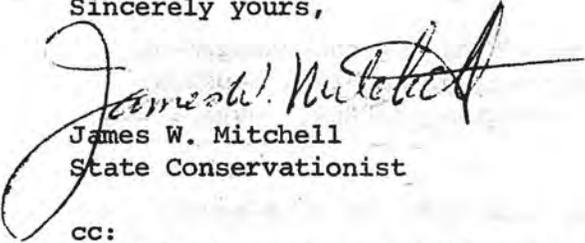
Mr. Robert R. Tyrrel
Acting Regional Forester
U. S. Forest Service
P. O. Box 3623
Portland, Oregon 97208

Dear Mr. Tyrrel:

We have reviewed your draft environmental statement for the Oregon Dunes National Recreation Area Proposed Management Plan.

We have no comments to offer. However, we appreciate the opportunity to review this draft.

Sincerely yours,


James W. Mitchell
State Conservationist

cc:

Kenneth E. Grant, Administrator, SCS, Washington, D.C.
USDA Coordinator of Environmental Activities (Office of the Secretary,
USDA, Washington, D.C. 20250)



DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

NORTHWEST REGION
FAA BUILDING BOEING FIELD
SEATTLE WASHINGTON 98108



November 12, 1974

Mr. Robert R. Tyrrel
Acting Regional Forester
U. S. Dept. of Agriculture
Forest Service
P. O. Box 3623
Portland, Oregon 97208

Dear Mr. Tyrrel:

We have reviewed the draft environmental statement for the Oregon
Dunes National Recreation Area and have no comments to offer.

Sincerely,

A handwritten signature in cursive script, appearing to read "H. Sperber".

HANS J. SPERBER
Chief, Planning Staff, ANW-4

4

FEDERAL POWER COMMISSION
REGIONAL OFFICE
555 BATTERY STREET, ROOM 415
SAN FRANCISCO, CALIF. 94111

December 13, 1974

Mr. Robert R. Tyrrel
Acting Regional Forester
Siuslaw National Forest
P. O. Box 3623
Portland, Oregon 97208

Dear Mr. Tyrrel:

This is in response to your letter of October 2, 1974, requesting our comments on your draft environmental statement for the Oregon Dunes National Recreation Area Proposed Management Plan.

As described in the draft the plan will provide for a broad spectrum of recreation activities, including the improvement of an existing road.

We have reviewed the draft to determine the effect on matters affecting the Commission's responsibilities. Such responsibilities relate to the development of hydroelectric power and assurance of the reliability and adequacy of electric services under the Federal Power Act, and the construction and operation of natural gas pipelines under the Natural Gas Act.

Our review indicates that the proposed plan apparently would have no effect on such facilities.

Sincerely yours,

M. Frank Thomas

M. Frank Thomas
Regional Engineer



OFFICE OF THE ASSISTANT SECRETARY OF COMMERCE
Washington, D.C. 20230

5

December 12, 1974

WATERSHED MGT.

1974

F.S.

R-4

	Action
	Infor.
ACE	___
WRB	___
GWS	___
PAK	___
RTM	___
DE	___
LDI	___
GR	___
ESN	___
HEP	___
VFO	___
F	___
CI	___
JE	___
LEE	___
MFH	___

Mr. Robert R. Tyrrel
 Acting Regional Forester
 United States Department of
 Agriculture Forest Service
 Region 6
 P.O. Box 3623
 Portland, Oregon 97208

Dear Mr. Tyrrel:

The draft environmental impact statement for "Oregon Dunes National Recreation Area-Management Plan," which accompanied your letter of October 2, 1974, has been received by the Department of Commerce for review and comment.

The statement has been reviewed and the following comments are offered for your consideration.

Bench marks and triangulation stations have been established by the National Geodetic Survey in the vicinity of the proposed project. Construction of the planned access roads, parking lots, campgrounds, etc., could result in destruction or damage to some of these monuments. The National Geodetic Survey requires sufficient advance notification of impending disturbance or destruction of monuments so that plans can be made for their relocation. The National Geodetic Survey recommends that provision be made in the project funding to cover costs of monument relocation.

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving a copy of the final statement.

Sincerely,

Sidney R. Galler
 Sidney R. Galler
 Deputy Assistant Secretary
 Environmental Affairs

6



U. S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
Room 412 Mohawk Building
222 S.W. Morrison Street
Portland, Oregon 97204

November 18, 1974

IN REPLY REFER TO
10ED.3

Mr. Theodore A. Schlapfer
Regional Forester
Region 6
U. S. Forest Service
P. O. Box 3623
Portland, Oregon 97208

Dear Mr. Schlapfer:

Subject: The Oregon Dunes, National Recreation Area DEIS

We have reviewed the subject Draft Environmental Impact Statement and have the following comment for your consideration:

Existing Federal-aid highway route U.S. 101 crosses the National Recreation Area from near Westlake to the vicinity of Elbow Lake. We understand considerations are being made to classify portions of the NRA as Wilderness Area. If U.S. 101 is within the wilderness study area, any determination should include allowance for future required improvement to the highway.

Very truly yours,

Hugh B. Henry
Director, Office of Environment
and Design

CLS



DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD

MAILING ADDRESS:
COMMANDER (M)
THIRTEENTH COAST GUARD DISTRICT
618 SECOND AVE.
SEATTLE, WASH. 98104
PHONE: (206) 624-2902

5922/19-1
Ser mep 1538
9 DEC 1974

T. A. Schlapfer
Regional Forester
U. S. Forest Service
P.O. Box 3623
Portland, Oregon 97208

Re: Draft EIS, The Oregon Dunes
N.R.A. Management Plan

Dear Mr. Schlapfer:

Thank you for the opportunity to review this proposed management plan. The Thirteenth Coast Guard District has the following comments:

- (1) The Coast Guard is authorized to maintain aids to navigation under 14 USC 81. Several rivers bisect the Oregon Dunes N.R.A. We maintain aids to navigation on these rivers and will have a continuing need to do so.
- (2) We emphasize the need to plan and design in a manner that will preclude petroleum or hazardous substance discharges. The Federal Water Pollution Control Act as amended in 1972 (33 USC 1321) prohibits virtually any discharge of petroleum products or harmful quantities of hazardous substances; therefore, we recommend that careful consideration be given to the location and methods of storage, transfer, and transport of these materials.

Sincerely,

S. S. BECKWITH
Captain, U. S. Coast Guard
Chief, Marine Safety Division
By direction of the District Commander

REPUBLIC OF THE PHILIPPINES
Department of Education



Office of the Director
Department of Education
Malacañan Palace, Manila

Division Office
Department of Education
Cebu City

For your information and guidance,
the following is being furnished to you:

1. List of candidates

2. The list of candidates for the position of
Teacher III, Grade School, District Office,
Cebu City, is being furnished to you for
your information and guidance.

3. The list of candidates for the position of
Teacher II, Grade School, District Office,
Cebu City, is being furnished to you for
your information and guidance.

4. The list of candidates for the position of
Teacher I, Grade School, District Office,
Cebu City, is being furnished to you for
your information and guidance.

Very truly yours,

[Signature]
Director

Enclosure
Office of the Director
Department of Education
Malacañan Palace, Manila

8



DEPARTMENT OF THE ARMY
 PORTLAND DISTRICT, CORPS OF ENGINEERS
 P. O. BOX 2946
 PORTLAND, OREGON 97208

8410
 RECEIVED
 WATERSHED MGT.
 OCT 31 1974
 F.S. R-6

REPLY TO
 ATTENTION OF:

NPPEN-EQ

24 October 1974

Action
 Infor.

WRB ——— Theodore A. Schlapfer
 GWS ——— Regional Forester, U.S.D.A. Forest Service
 PAK ——— Pacific Northwest Region 6
 DEB ——— P. O. Box 3623
 LDH ——— Portland, Oregon 97208
 CLS ———
 DGT ———

HRB ——— Dear Mr. Schlapfer:

WAP ——— The draft environmental impact statements on Wilderness Suitability of the
 EEW ——— Oregon Dunes National Recreation Area and for the master plan for the
 JHN ——— Oregon Dunes National Recreation Area which you furnished to our North
 JFS ——— Pacific Division office have been referred to this office. We have re-
 LWB ——— viewed both statements and have the following general comments to offer
 MPH ——— relative to the Corps of Engineers functional areas of responsibility
 and expertise as identified in the CEQ guidelines.

Handwritten notes:
 JFS
 LWB
 MPH

Management Plan EIS
Section E-2, page 8, Recreation:

The Corps owns 8.7 acres of land behind the Siuslaw North Jetty and holds a permanent easement over 8.6 acres for a jetty access road. The south jetty parking area and access road have been included in the NRA with the provision that the lands may be used for jetty rehabilitation or disposal of dredged material (Section 5, P.L. 92-260). On the south side of the Umpqua at the mouth, the Corps owns 71 acres and maintains a parking area adjacent to the county access road. The north jetty area has been included in the NRA with provisions similar to those for the Siuslaw south jetty. Planning for Corps-owned sites at both rivers indicates that only maintenance of existing facilities will be undertaken in the future. This course of action appears consistent with the NRA plan.

The 2,340 acres on the North Spit at Coos Bay just south of the NRA are managed by the Corps. Areas leased or owned by private and public interests include the Menasha Corporation settling pond, and two privately owned areas

24 October 1974

on the east side of the Spit. A detailed master plan is being prepared for the Corps properties based in part on a series of management options noted in the Coastal Reconnaissance Study, Oregon and Washington, June 1974. Several of the options appear consistent with the NRA proposed action, but will require further coordination to assure compatibility.

Section G-2, page 13, Parking:

The Corps is presently studying the advisability of extending the north and south jetties at Siuslaw providing additional small boat facilities adjacent to the north jetty, and changes to the training jetty configuration at Umpqua River. Should either study indicate the feasibility of jetty improvements or additional small boat facilities, and should such improvements be authorized, the construction activity would temporarily affect use of NRA facilities.

Section 6-16, page 20:

The above noted plans are presumed to be those referenced in this section.

Appendix V, page 11:

The abbreviation C.O.E. is not defined in the text or on the Plate.

Wilderness Suitability EIS

Section C, page 4, paragraph 1:

What is "a good population" of fish?

Section G, page 7, paragraph 3:

The last sentence of the paragraph is disjointed. The five species are of concern because they are rare, endangered or peripheral; not because man's activities within the NRA must be careful to avoid having a detrimental effect on them. Although the latter is commendable, the management plan makes no specific recommendations to attain this end.

Page 14, Plate:

See comment regarding Appendix V above.

Section IIC, page 18, item 2:

Are there any weather modification projects proposed for the Oregon Coast?
If so, provide a reference.

NPPEN-EQ
Theodore A. Schlapfer

24 October 1974

Section III, page 18, Title:

"Favoravble" should be spelled correctly.

Section III, page 19, D:

Not all dune "blowouts" are catastrophic, only those in proximity to major man-made structures or dwellings.

Section V, page 20:

The viability or non-viability of this alternative should be elaborated on the basis for the determination referenced.

We appreciate the opportunity to review and comment on this draft statement.

Sincerely yours,



L. J. STEIN
Chief, Engineering Division



United States Department of the Interior

OFFICE OF THE SECRETARY
PACIFIC NORTHWEST REGION
P.O. Box 3621, Portland, Oregon 97208

December 3, 1974

ER-74/1272

Mr. Robert R. Tyrrel
Acting Regional Forester
Siuslaw National Forest
P.O. Box 3623
Portland, Oregon 97208

Dear Mr. Tyrrel:

We have reviewed the draft environmental statement for the Dunes National Recreation Area Management Plan, Siuslaw National Forest, and we offer the following comments and suggestions.

General Comments

Establishment of the Oregon Dunes National Recreation Area is expected to result in a "threefold overall increase in recreation use" by the year 2000. We are concerned about the inadequate discussion of the impacts of growth on nearby communities.

The description of impacts of the alternatives on fish and wildlife is rather general. The alternative plans cover a wide range of developments which do not all have minimum adverse impacts on fish and wildlife as mentioned in the statement. A more critical review of the impacts by each development action for the different alternatives should be included in the final environmental statement.

Specific Comments

Pages 12 and 16. Since proposed developments by the Forest Service are in the planning stage, sufficient detail is not available to evaluate construction impacts to renewable or non-renewable resources. The scope of construction plans should be indicated in the final statement.

Page 14. The possibility of providing low-cost housing or hostels in conjunction with bicycle camps might warrant future consideration.

Page 16. It is stated that unmanned visitor contact stations are to be provided. Again, construction impacts cannot be evaluated without specific information on size, location, etc.

Page 21. We believe more information should be provided on the "significant impacts" of the National Recreation Area on local communities.

Page 22, F. We disagree with the statement that development will not occur in critical habitats. Under the proposed action, an extensive trail system will be constructed. The report's map shows these trails to follow the shorelines of the ocean, streams, and lakes within the National Recreation Area (NRA). These shoreline areas are of utmost importance to wildlife, which use them as resting and feeding grounds. The NRA's ocean shoreline provides nesting habitat for the snowy plover which is of particular concern. The construction of the trails and the numerous people they would concentrate along this valuable habitat would have significant adverse impact upon the resource.

The construction of the hiker-boater camp and Fort Umpqua historical site (on Umpqua North Spit) would jeopardize important wildlife habitat. The small island in the estuary to the east of the proposed development is a valuable haul-out area for harbor seals. The island and waters between it and the spit also are used by large numbers of gulls, shorebirds, and waterfowl as a feeding and resting area. Development in this vicinity would reduce the suitability of the habitat and impair the wildlife resource.

Section F also should include a discussion of the impacts on wildlife by the possible leveling of the foredune with heavy equipment. While this action may allow for the continuance of the sand dunes in their natural state, it also would have an impact upon those wildlife species which presently inhabit or use the foredune and deflation plain areas.

Page 24. It is stated that, if the lakes "are drawn down by pumping, water will be restored..." Inasmuch as any removal of water from the dunes area is likely to have some effect on lake levels, the statement ought to be qualified to indicate "excessive drawdown."

The final statement might also provide information on: maintenance plans, i.e., solid waste disposal, and visitor management plans, i.e., campground use fees, special use permits (dune buggy rallies), fish limits, motor boats, and bathing.

Sincerely yours,



Roy H. Sampsel
Special Assistant
to the Secretary

cc:
Council on Environmental Quality (5)
Director, Office of Environmental
Project Review
Director, Bureau of Outdoor Recreation
Director, Fish & Wildlife Service
Director, National Park Service
Director, Geological Survey
Director, Bureau of Land Management
Regional Director, Pacific Northwest
Region, Bureau of Outdoor Recreation
Regional Director, Pacific Northwest
Region, Fish & Wildlife Service
Regional Director, Pacific Northwest
Region, National Park Service
District Chief, WRD, Geological Survey,
Oregon
Assistant Director, Western Region,
Geological Survey, Menlo Park, CA
State Director, Bureau of Land Management,
Oregon

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

10



RECEIVED
NOV 12 1974
F.S. R-6

REPLY TO
ATTN OF:

10MEI - M/S 325

November 12, 1974

Action
Infor.

WRB	---	---
GWS	---	---
PAK	---	---
DES	---	---
LDW	---	---
U	---	---
DL	---	---
H	---	---
WAP	---	---
JAN	---	---
JFS	---	---
LWR	---	---
MFH	---	---

Mr. Robert R. Tyrrel
Acting Regional Forester
United States Department of Agriculture
Forest Service
Region 6
P. O. Box 3623
Portland, Oregon 97208

Dear Mr. Tyrrel:

We have reviewed the draft environmental impact statement for the Oregon Dunes National Recreation Area. Our comments are directed to areas where we feel additional discussion is warranted in the final environmental statement.

On Pages 12-20, the statement discusses the addition of many types of recreational facilities. Because these new facilities will create increased visitations we believe additional information is needed to predict the environmental impacts on the Oregon Dunes area. Page 12 states that the purpose of the NRA is to provide a plan "that is sensitive to public needs and desires, yet which maintains the integrity of the environment." We believe the statement fails to illustrate that such a balance will be achieved. The goals and methodology behind creating an NRA are well defined, but the relationship these goals have with the specific environmental characteristics of the Oregon Dunes area are not well defined.

Carrying capacities of those campgrounds where fragile beach grasses or sand stabilization may be a problem should be discussed. To offer increased recreational opportunities without specific controls could create major adverse impacts. These specific controls as they relate to specific activities and areas should be included in the final statement. It is not enough to simply state "as use increases, additional controls will be necessary" (page 21). What controls will be implemented and at what point does it become necessary?

Two areas have been set aside for off-road vehicles yet there is no discussion of this in the "Environmental Impact" section. The statement offers no predictions of the number of off-road vehicles expected to use these areas. Again the statement focuses on the type of recreation to be provided without realizing the environmental effects. Predictions should be made and correlated to available space. This information could then be used to instigate a permit system which would control use and assure mitigation of associated environmental impacts. Controls and penalties should be well defined.

Generally the statement seems to be a justification of a chosen alternative. We hope that the final statement will relate the environmental impacts which will be associated with that alternative.

Our comments on this draft statement have been classified LO-2, LO (Lack of Objections) 2 (Insufficient Information). The classification and the date of EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our review on proposed Federal actions under Section 309 of the Clean Air Act.

Thank you for the opportunity to review this draft statement.

Sincerely,



Clifford V. Smith, Jr., Ph.D., P.E.
Regional Administrator

11/20/74

WS



EXECUTIVE DEPARTMENT

LOCAL GOVERNMENT RELATIONS DIVISION

240 COTTAGE STREET S.E. • • • • SALEM, OREGON 97310

NOV 25 1974
R-6

TOM McCALL
GOVERNOR

November 25, 1974

J. N. PEET
Director

Mr. Robert R. Tyrrel
Acting Regional Forester
U.S. Department of Agriculture
Forest Service
P.O. Box 3623
Portland, Oregon 97208

Dear Mr. Tyrrel:

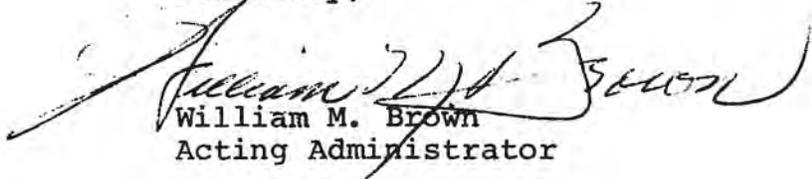
Subject: Oregon Dunes National
Recreation Area Manage-
ment Plan
PNRS #7410 4 800A

Thank you for submitting your draft Environmental
Impact Statement for State of Oregon review and comment.

Your draft was referred to the appropriate state
agencies. The State Water Resources Board, the State Fish
Commission, the State Highway Division, and the State De-
partment of Geology and Mineral Industries offered the
attached comments which should be addressed in the preparation
of your final Environmental Impact Statement.

We will expect to receive copies of the final
statement as required by Council of Environmental Quality
Guidelines.

Sincerely,


William M. Brown
Acting Administrator

WB:Lk

Attch.

ml



OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEARINGHOUSE

OCT 18 1974

GENERAL INDS

Local Government Relations Division
240 Cottage Street S.E., Salem, Oregon 97310
Ph: 378-3732

OCT 22 1974

TELETYPE DIVISION

PNRS STATE REVIEW

Project #: 74104800A

Return Date: NOV 15 1974

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

1. A response is required to all notices requesting environmental review.
2. OMB A-95 (Revised) provides for a 30-day extension of time, if necessary. If you cannot respond by the above return date, please call the State Clearinghouse to arrange for an extension.

ENVIRONMENTAL IMPACT REVIEW DRAFT STATEMENT

- () This project does not have significant environmental impact.
- () The environmental impact is adequately described.
- (X) We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement regarding this project.
- () No comment.

REMARKS

The extent to which the groundwater will be protected from sewage pollution is unclear.

Approved: Geology

Bv

[Handwritten signature]



OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

ODNRA
1-20-74
11/18/74

STATE CLEARINGHOUSE LOCAL GOVERNMENT RELATIONS DIVISION

RECEIVED

Local Government Relations Division
240 Cottage Street S.E., Salem, Oregon 97310
Ph: 378-3732

NOV 18 1974

FISH COMMISSION

PNRS STATE REVIEW

Project #: 7410 4 800 A

Return Date: NOV 15 1974

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

1. A response is required to all notices requesting environmental review.
2. OMB A-95 (Revised) provides for a 30-day extension of time, if necessary. If you cannot respond by the above return date, please call the State Clearinghouse to arrange for an extension.

ENVIRONMENTAL IMPACT REVIEW DRAFT STATEMENT

- () This project does not have significant environmental impact.
- () The environmental impact is adequately described.
- () We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement regarding this project.
- () No comment.

REMARKS

Staff of the Fish Commission supports the concepts and objectives of the proposed management plan. It provides adequate safeguards to preserve existing fish and wildlife resources within the Oregon Dunes National Recreation Area. However, we do not support the five alternatives to the proposed management plan in their present form.

The Siuslaw National Forest has put forth a commendable effort in evaluating management alternatives, social and environmental impacts of each, and in weighing the potential inclusion of the Oregon Dunes NRA in the federal wilderness system. Despite considerable public pressure to designate part or all of the area as wilderness, we honestly believe the proposed management plan would provide an adequate mixture of public uses of the area and yet retain the bulk of its unique features consistent with the ability to change management direction as future public interest might direct.



OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEARINGHOUSE

Local Government Relations Division
240 Cottage Street S.E., Salem, Oregon 97310
Ph: 378-3732

PNRS STALL REVIEW

Project #: 7410 4 800 A

Return Date: NOV 15 1974

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

1. A response is required to all notices requesting environmental review.
2. OMB A-95 (Revised) provides for a 30-day extension of time, if necessary. If you cannot respond by the above return date, please call the State Clearinghouse to arrange for an extension.

ENVIRONMENTAL IMPACT REVIEW DRAFT STATEMENT

- () This project does not have significant environmental impact.
- () The environmental impact is adequately described.
- () We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement regarding this project.
- () No comment.

REMARKS

RECEIVED
OCT 18 1974

STATE WATER RESOURCES BOARD

Agency Water Res

By

Shirley F. Chapman ✓

COMMENTS: 7410 4 800 A

Page 7 E. Natural Resources - 1. Water

To quote: "In the long term, many shortages may be resolved by utilization of water from streams and lakes outside the N.R.A."

State Water Resources Board water use policy restricts water usage from Oregon coastal lakes to only domestic. Most streams adjoining the N.R.A. are not dependable water sources for future municipal or industrial users in view of existing water rights.

Future water needs could be supplied from dunes groundwater with minimal adverse impact to fisheries, wildlife, recreation and natural habitats if proper safeguards were developed.

Comment Page 26 - B. Water & Soil

Water supply and waste disposal problems generated by N.R.A. visitors will need environmentally sound solutions. Equitable cost sharing policies, by resident and non-resident users, to implement desirable solution should be developed.

- o o o -



OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

NOV 12 1974

STATE CLEARINGHOUSE

Local Government Relations Division
240 Cottage Street S.E., Salem, Oregon 97310
Ph: 378-3732

PNRS STAFF REVIEW

Project #: 7410 4 800A

Return Date: NOV 15 1974

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

1. A response is required to all notices requesting environmental review.
2. OMB A-95 (Revised) provides for a 30-day extension of time, if necessary. If you cannot respond by the above return date, please call the State Clearinghouse to arrange for an extension.

ENVIRONMENTAL IMPACT REVIEW DRAFT STATEMENT

- () This project does not have significant environmental impact.
- () The environmental impact is adequately described.
- (X) We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement regarding this project.
- () No comment.

REMARKS

See attached letter.

Agency

Highway

By

Eb Berglund





OREGON STATE HIGHWAY DIVISION

FILE ENV 2-1

REGION 3

P.O. BOX 1128 • ROSEBURG, OREGON • 97470 • Phone 672-6541

TOM McCALL
GOVERNOR

F. B. KLABOE
Administrator of Highways

Theodore A. Schlapfer
Regional Forester
U. S. Forest Service
P. O. Box 3623
Portland, OR 97208

November 6, 1974

Dear Mr. Schlapfer:

We have reviewed your draft environmental impact statement for the Management Plan of the Oregon Dunes National Recreation Area. State Parks, also a part of the Highway Division, will forward their review in a separate letter.

The several options discussed appear to have no primary impacts upon U.S. Highway 101, except for some potential new access connections or old access revisions between U.S. 101 and the NRA. In this regard, consultation with our local District Engineers may be desirable.

However, a number of secondary impacts upon the levels of service, maintenance and potential improvements of U. S. 101 are anticipated. As you note on Pages 6 and 8 of your report,

All travelers to the NRA, whether in state or out of state, must travel U. S. Highway 101 for at least a portion of that distance. Most out of state visitors arrive via this highly scenic highway. During the summer months, U. S. 101 is heavily laden with tourist traffic all days of the week. Current annual recreation use of the NRA is approximately 1.8 million visitors. A threefold overall increase in recreation use is expected by the year 2000.

Theodore A. Schlapfer

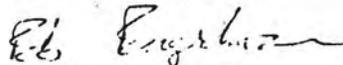
-2-

November 6, 1974

We are concerned about Section 4 (f) requirements and potential future right-of-way needs for prospective highway improvements. We ask that close coordination be maintained between your office and ours regarding NRA management developments which may affect our ability to maintain and improve U. S. Highway 101.

We appreciate the opportunity to review this document and we look forward to receipt of your final statement.

Very truly yours,



EB ENGELMANN
Regional Environmentalist

EE/cw

Department of
Botany and
Plant Pathology



Corvallis, Oregon 97331

RECEIVED
WATERSHED NO. 1
1974
F.S. R-5

October 29, 1974

Robert R. Tyrrel
Acting Regional Forester
U.S.D.A., Forest Service
Region 6
P.O. Box 3623
Portland, OR 97208

Action
Info.

- WRB ___
- CWS ___
- AK ___
- DEB ___
- LDH ___
- LS ___
- DGT ___
- RB ___
- WAP ___
- EEW ___
- HN ___
- JFS ___
- WR ___
- IFH ___

Dear Mr. Tyrrel:

The Dean of Agriculture, W. T. Cooney, has asked me to review and respond to the draft environmental statements for the Oregon Dunes National Recreation Area Proposed Management Plan and Wilderness Suitability prepared by your office.

As a plant ecologist in the Department of Botany at O.S.U. for some 24 years, I have had the opportunity to gain some knowledge of this dune system and to follow the forces involved in the development of a dune use policy. I can therefore appreciate some of the problems involved in this effort.

I like your proposed plan. It reflects a remarkable amount of study and the total package strikes a sensible balance between preserving the natural biology of the area and use.

I laud your plan for periferal parking and limited campgrounds. Also, the development of tracts with over-nite facilities on Siltcoos, and Takenitch lakes, and the north shore of the Umpqua river.

I am especially enthusiastic about the possibility of an interpretive center located near the Umpqua Scenic area. The success of the information center at Cape Perpetua reflects a growing interest by the public in wanting to know more about the processes involved in relatively undisturbed landscapes.

I am also glad to note your recognition of the scientific value of these dunes. Whether or not a natural research area is designated, I trust that unique and fragile areas will be carefully monitored and preserved. I am thinking in particular of the more fragile vegetated islands within the dune sheet, those plants peculiar to the ends of parabala dunes formed from southwest winter winds, and dune lakes of various ages.

Even though narrow, the sound of surf, prevailing winds, dune vegetation and the rapidity of its change with abundant rainfall and dune movement, provide an opportunity for an outdoor experience closely similar to the wilderness in isolated areas. Such an opportunity short of backpacking is a unique feature of this area. Your plan appears to recognize this fact.

Robert R. Tyrrel

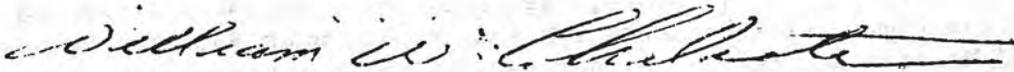
-2-

October 29, 1974

Although not a dune buggy enthusiast, I recognize the need to provide for this activity. The areas designated are reasonable. My only concern is the Honeyman Park area. Cleowax Lake and the old deflation plain to the west may require more protection from dune buggies especially in view of the number of people who hike from Cleowax Lake to the beach. Another point which no doubt has been considered is the Coast Guard telephone line which parallels the beach. If this line could be buried or moved the view to the ocean would be greatly improved.

Recognizing the variety of pressures which are involved in planning effort of this kind, this looks like a good plan. I hope it will be adopted.

Sincerely yours,



William W. Chilcote
Professor of Botany

dw

cc W. T. Cooney
T. C. Moore

OREGON WILDLIFE COMMISSION
staff comments on
Draft Environmental Statement

OREGON DUNES
NATIONAL RECREATION AREA

Use of fish and wildlife within the Oregon Dunes NRA includes angling, hunting plus extensive viewing and photographing. In large part, the Draft Environmental Statement allows for these recreational pursuits. The following recommendations are designed to identify areas that need strengthening to better provide for fish and wildlife management on the area.

1. Whereas the dispersal of recreationists is desirable, care must be taken to protect fish and wildlife habitat in the process. Any additional campgrounds, other than those for boat-camper use, should be away from streams, lakes and other waters. Trails constructed near streams should be located so as to provide maximum protection to streamside vegetation.
2. On page 16, #10 - "Hunting," it is stated that hunting restrictions may be desirable to prevent shooting of nongame species. If so, it is not the prerogative of the Forest Service to so restrict. Closures for this purpose are not in keeping with Congressional intent, the Memorandum of Understanding between the Wildlife Commission and the Forest Service on the Constitutional right of the State of Oregon to manage resident wildlife. This statement is out of place in the draft EIS and should be deleted.
3. The discussion on "Wildlife Habitat Improvement" could be more explanatory on the protection of critical wildlife habitat, especially habitat used by endangered or threatened species.

11/1/74

Oregon Wildlife Commission
Additional Staff Comments On
Draft Environmental Statement
Management Plan
Dunes National Recreation Area

The Oregon Wildlife Commission is pleased to be able to comment on the Dunes NRA Management Plan. It also wishes to compliment the Forest Service on the excellent job of planning it has done regarding this truly unique area.

The Dunes National Recreation Area offers a variety of unique habitats inhabited by some 426 species of wildlife. Of these, 8 birds and 2 mammals are considered endangered, threatened, or peripheral either within the State or nationally. In addition, 8 critical wildlife habitats are present within the NRA, so classified because they are either necessary for the maintenance of an endangered, threatened, or peripheral species or because they are used by a diverse number of species or large number of individuals. It is imperative that both the habitats and the wildlife be given long-range protection.

We do, however, question that adequate protection is assured under the current plan. Experience has shown that administrative changes on other National Forests have been made that did not conform to the original management plan.

Our primary concern is that too much flexibility is allowed for changes to the management plan either as a result of public pressures or individual administrative decisions. An example of the former is the two ORV corridors now being considered that

were not part of the original planning alternatives. In our opinion, use of these corridors would result in harassment of various wildlife species, would be detrimental to the observation and enjoyment of wildlife, and would have an adverse impact on vegetative communities and wildlife habitat.

Specific comments on the plan follow: The proposed ORV restricted areas are wholeheartedly supported, but it is recommended that the proposed corridor down Threemile Creek and the one across the Umpqua North Spit to the south be included in the restrictions. The existence of these corridors would allow harassment of marine mammals and shorebirds. Also the razor and softshell clam beds on the Umpqua North Spit and the Spit's bayside can be reached adequately by foot or boat. This fragile area should be protected from all vehicular traffic.

Existing Forest Service public boat ramps at Siltcoos and Tahkenitch lakes should be retained, rather than eliminated, because of high current and expectant use. Other existing and/or planned public ramps there will, alone, not satisfy demand even in the near future.

The advisability of mechanically removing sand that occasionally blocks the mouths of anadromous fish streams is questioned. At the time sand blockage occurs, stream flows are very low and to allow fish passage at this time would subject them to undue angling pressure and other harassment.

Recommendations:

The Forest Service Management Plan Environmental Statement recognizes that the retention of a large portion of the area in

an undeveloped state will have the greatest single positive influence on wildlife. We concur and, therefore, recommend that a Backcountry designation (as authorized in the Forest Service Manual) be established for the area between the Siltcoos Outlet and Tenmile Creek Outlet inclusive. We further recommend that any changes in this plan be made in accordance with the requirements in Public Law 91-190.

12/3/74

Schneider
Harper
Ives
Lantz
Hutchison

(attachment)



FORESTRY DEPARTMENT

OFFICE OF STATE FORESTER

2600 STATE STREET • SALEM, OREGON • 97310 • Phone 378-2560

December 20, 1974

Mr. Theodore A. Schlapfer
Regional Forester
U. S. Forest Service
P. O. Box 3623
Portland, Oregon 97208

Dear Ted:

The Oregon Dunes National Recreation Area draft impact statement and management plan has been reviewed by several of our staff and field members. Following are some of their general comments, observations and recommendations:

General Comments and Observations:

The proposal appears to combine the best features of the various alternatives. The stated environmental concerns seem to cover the whole range of interests.

This Department will be working with the Oregon Dunes N.R.A. in several respects. The area includes approximately 3200 acres of private commercial forest land and this Department is responsible by statute to enforce all existing laws, including the Oregon Forest Practices Act and Oregon Fire Laws on these private commercial forest lands. All operations on those lands must be inspected for compliance with those Laws by a representative of the Forestry Department. We will encourage a close and open relationship so that both of the agencies may profit.

The Department supports the fire management program outlined in the Draft Environmental Statement for the Management Plan. We are concerned with protecting all of the state's resources from devastation by fire. Vigorous attack measures will prevent the spread of wildfire to forested lands within and adjacent to the N.R.A. We encourage the use of controlled fire when needed, both for ecological reasons and as a tool in

Theodore A. Schlapfer
Regional Forester
Portland, Oregon
December 20, 1974

fuels management within commercial timber lands. We will cooperate with the Forest Service to develop a strong wild-fire prevention program within, and adjacent to the N.R.A.

We suggest that it would be in the best interest of both the private commercial wood producers within the N.R.A. and the Forest Service to formulate definite goals and guidelines in a management plan for each wood producer. These plans should be reviewed and amended periodically. Harvesting methods, road systems, allowable harvesting schedules, reserved timber and special management zones should be established by the plans. Specifying the obligations of the wood producers would act to protect their interests.

The management plans should specifically address themselves to Section 7-C of Public Law 92-260 to avoid a potential conflict in this section dealing with management standards imposed upon the private landowner which are "not Forest land". The amount of land to be harvested during various periods should be specified.

The salvage of dead trees from the N.R.A. will contribute to the local economy, but care should be taken in choosing which trees should be salvaged. Dead trees which result from moving sands can be very aesthetically pleasing and might be left standing.

Recommendations

1. Under "permitted uses of Private Lands" (pp. 17-20), par. (a) (3) could be improved by adding that Timberlands under sustained yield management could continue so long as such management is being conducted in compliance with the Oregon Forest Practice Act and the Secretary determines that it is being conducted in accordance with management standards imposed by the Secretary comparable National Forest Lands.
2. "Sustained yield" is not defined, yet harvesting would not be permitted on lands not under sustained yield. In view of the large corporate ownerships involved, this question should be more sharply answered. The threat of loss of protection from eminent domain could limit the management alternatives, with resultant reduction in financial returns to owners.

Theodore A. Schlapfer
Regional Forester
Portland, Oregon
December 20, 1974

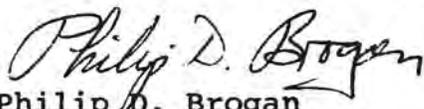
3. It appears that inadequate attention has been given to the evaluation and maintenance phase of the management plan. "Updating" should not be limited to "10-year" intervals, as indicated on page 20.

We regret it has taken us so long to make this response.

Thank you for the opportunity to make our comments.

Sincerely,

J. E. Schroeder, State Forester

By 
Philip D. Brogan
Management Analyst

PDB:nep

cc: Leslie Lehman
State Clearinghouse (PNRS #7410 4 800)

COOS-CURRY COUNCIL OF GOVERNMENTS

P. O. BOX 434
COOS BAY, OREGON 97420

SANDRA DIEDRICH
PLANNING DIRECTOR
PHONE 269-9316



December 10, 1974

U.S. Forest Service
Oregon National Dunes Recreation Area
Reedsport, Oregon

Gentlemen:

On November 14, 1974, the Coos-Curry Council of Governments reviewed the Wilderness Suitability Report for the Oregon Dunes National Recreation Area, the Environmental Statement on Wilderness Suitability for the Oregon Dunes National Recreation Area, and the Draft Environmental Statement for the Management Plan of the Oregon Dunes National Recreation Area at the regular monthly meeting. Staff was directed by the Council to present testimony at the Public Hearing in Reedsport on November 15, 1974 in behalf of the Council. This letter is intended to be submitted as the written testimony of the Coos Curry Council of Governments to complement the oral testimony presented at that Public Hearing.

The Council supports the findings of the Wilderness Suitability Report in that it supports no part of the Dunes National Recreation Area being designated as a wilderness area. In so doing, the Council recognizes the need for multi-purpose recreational areas and the need to protect the use of the dunes water resource by the Coos Bay-North Bend municipal water system.

Additionally, the Council recognizes the economic impact on the area resulting from multi-use recreation activities. Recognition of demand for public recreational land further supports the non-wilderness designation since removal of the Oregon Dunes National Recreation Area from multi-purpose use areas will potentially create public pressure for the conversion of other private lands to public ownerships, thereby, placing additional burden on the tax base.

While the Council generally supports the Management Plan, there are three concerns which ought to receive further consideration:

1. The need to provide adequate areas for each kind of use based on projected use not present use. Unless adequate area is provided for any specific use, further increased demands may create adverse impacts on

MEMBER AGENCIES

COOS COUNTY	NORTH BEND	COOS BAY SCHOOL DISTRICT
CURRY COUNTY	PORT ORFORD	COQUILLE SCHOOL DISTRICT
BANDON	POWERS	BANDON SCHOOL DISTRICT
BROOKINGS	PORT OF BANDON	BROOKINGS-HARBOR SCHOOL DISTRICT
COOS BAY	PORT OF COOS BAY	GOLD BEACH HIGH SCHOOL DISTRICT
COQUILLE	PORT OF BROOKINGS	GOLD BEACH SCHOOL DISTRICT 3C
EASTSIDE	PORT OF GOLD BEACH	MYRTLE POINT SCHOOL DISTRICT
GOLD BEACH	COOS BAY/NORTH BEND WATER BOARD	SOUTHWESTERN OREGON COMMUNITY COLLEC
LAKESIDE	LAKESIDE WATER DISTRICT	

areas designed to serve present usage patterns. By not designating adequate use areas, the management plan will be locking in future problems. In relation to this concern is the classification system for ORV's. Unfortunately in the Management Plan, all ORV's are classified as the same which does not recognize actual usage differences. For example, 4-wheel drive vehicles generally serve an entirely different function for users than do dune buggies. There is a greater exploratory or transit character in 4-wheel drive usage. Limiting 4-wheel drive vehicles only to the same areas as dune buggies renders the characteristic use as minimal. There ought to be greater consideration of the varying usage characteristics and area-space needs of different types of ORV's rather than classifying all as the same.

2. The need to provide more adequate protection for the private property owners within the Inland Sector needs to be strongly recognized. The U.S. Forest Service ought to work closely with the appropriate units of local government in order to provide more equitable treatment to the property owners.

3. The need for adequate access to the area itself is a strong concern of the Council. While present access may be adequate at this time, the amount of access needed may be more, shortly, if use continues to grow at the present rate. Without providing adequate access, the present access will become overburdened. This overburdening may lead to substantial degradation of those access areas. Whereas, if access needs were projected and planned for, such environmental and human abuse could be minimized. In order to clearly define the access situation, it is the recommendation of the Council that a road be constructed along the Coos County right-of-way at Ten-Mile Creek. Yet, the Council also recognizes the need for more middle and Northern access to the area in the future.

Therefore, in summary, the Coos-Curry Council of Governments supports the multi-use nature of the Oregon Dunes National Recreation area as generally outlined in the Management Plan, urges consideration of maximum flexibility for present and future use in order to minimize impact on certain specified areas, and unequivocally does not support the designation of any part of the Oregon Dunes National Recreation Area as wilderness.

Thank you for your consideration of the Council's comments.

Sincerely,


Sandra Diedrich
Planning Director

CS

DATE: December 11, 1974 17

TO: Robert R. Tyrrel
Acting Regional Forester
P.O. Box 3623
Portland, Oregon 97208

FROM: Lane Council of Governments
135 Sixth Avenue East
Eugene, Oregon 97401

By Kenneth P. Battelle
Planner
Title

SUBJECT: Oregon Dunes Draft Environmental Statement: Management Plan

Type of Referral: Environmental Statement

We have reviewed the proposal for its relationship to existing or proposed plans or programs of this agency and comment as follows:

- () We approve as submitted.
- (x) We have no comment.
- () It has no significant effect.
- () More information is needed for an adequate response.
- () We disapprove because of adverse effects as noted in the comments.
- () Additional comments are included for project improvement.

COMMENTS

cc-Local Government Relations Division, Salem

Comments reflect review by the following agencies:

COOS BAY TIMBER OPERATORS

KENSTONE
QUARRY

ROCK PRODUCTS
To Meet Your Specifications

KENROCK
QUARRY

TELEPHONE 756-6254

P. O. BOX G :- NORTH BEND, OREGON 97459

Action
Infer.

WRB ___
GWS ___

DEB ___
LDH ___

CLS ___
DGT ___

HRB ___

WAP ___
EEW ___

MPH *ml*

October 11, 1974

RECEIVED
WATERSHED MGMT.
OCT 17 1974
F.S. R-6

Mr. Robert Tyrrel,
Acting Regional Forester
U.S. Dept. of Agriculture Region 6
P.O. Box 3623,
Portland, Oregon 97208

Dear Mr. Tyrrel:

I have looked over the material received yesterday from your group which includes - Proposed Management Plan, Draft Statement for same, Wilderness Suitability Report, and it's Draft.

I would refer you to page 38 and 39 of the Draft of Environmental Statements which deals with words of praise. I think this is a most valuable portion of the report since it serves to repay you and your people for the splendid methods used to further the Dunes cause for all of us. It certainly reflects my feeling and any with whom I have talked - Keep it up.

The cover letter indicates that further input is welcome both in writing and in public hearings. I would like to enter this in writing and also the opportunity of reading excerpts from it as well as earlier letters to Mr. Cal Heckard dated March 5, 1974 and to the Coos County Board of Commissioners dated February 28, 1974, both of which you should have copies (advise if you need copies) into the meeting record of November 15th at Reedsport.

There has been discussions in the past with some of your staff who feels that the Hauser area Inland Sector which extends East of the Railroad tracks was poorly selected. My belief is likewise. Failure to not correct this only because it is difficult, immediately becomes a challenge to me and I hope you. A perfectionist reacts this way, I believe. I would suggest as one alternate that you consider adding an equal or larger acreage from across the Southern end of the Dunes area where it would be most helpful in relation to the existing Horsfall road which serves an important park function.

Supporting this view are these points:

1. This area needs to be added because of Scenic reasons.
2. This area is in U.S. Control.
3. This area has been left out without due consideration of the Horsfall Road R/W and it's orderly maintenances and control.



By re-reading the two earlier letters you will find my other views and I can take less of your time here.

Please again realize while some of your findings are not to my own liking, I do think that the results are fair and well studied. My preference is alterinate "C" before and after the summary as illustrated.

Thank you.

Respectfully,

Glae C. Gould

Glae C. Gould

P.S.

Please take note of my letter from Coes County Commission dated October 4, 1974 which I have added just as this was ready for the mail.

County of Coos

Planning & Programming Dept.
Courthouse
Coquille, Oregon 97423
Telephone: 396-3121
267-7009



October 4, 1974

Robert L. Gerdes

Planning Director

Coos Bay Timber Operators
P. O. Box G.
New Bend, Oregon 97459

ATTN: Glae C. Gould

Re: Your letter dated September 30, 1974, requesting a change in the proposed interim zoning of parcels 1731, 1731-1 and 1733 Sec. 15, T. 24S., R. 13WWM, Coos County.

Dear Mr. Gould:

The Coos County Planning Commission heard your request for a change in the proposed interim zoning at their October 3, 1974 meeting.

At this meeting the commission moved to recommend approval of your request and recommended Interim Heavy Industrial (IHI) for the parcels mentioned above. Coos County Interim Zoning designation, however, does not supercede any Federal land use regulations in this inland sector of the Dunes NRA.

Should you have any further questions please feel free to contact

Sincerely,
PLANNING & PROGRAMING DEPT.

C. A. Mack
C. A. Mack, Planner II.

CAM/de

February 28, 1974

Coos County Board of Commissioners
Court House
Coquille, Oregon 97423

Honorable Gentlemen:

Re: Coos Bay Estuary Report

We at Coos Bay Timber Operators wish to express our hope that you will see fit and proper to continue to provide industry an opportunity to construct and maintain orderly work areas and surrounding in that area from the Hauser Station road - Northerly to and including the Reservation Ranch properties short of Saunders Lake. This should include both sides of the track but not to disturb the prevalent Sand Dune on the Westerly side of the track.

My reasons are enumerated and can be sustained:

1. Past and present property owners of this acreage have had and still have in mind their use for industrial activity associated with the Southern Pacific mainline.
2. Said SP mainline and controlled industrial activity can be neighbors to the Dunes Park without extracting from it's beauty or usefulness to the public.
3. The SP mainline which is used exclusively at present for transporting industries products can rightfully demand adjacent property for manufacturing especially when this property is in the heartland of 3 huge permanent, perpetual tree farms.
4. Most all of the land occupied by Reservation Ranch has been used by industry in the past and whom else north of North Bend is $\frac{1}{2}$ miles long which has been established for years for this precise usage.
5. The original funding for this RR was derived from a timberland environment to complement the manufacturing and transportation of Forest Products.
6. A properly controlled industry in this surrounding will indeed be an attraction for the public who are going to be using the Dunes Park.

7. There is adequate cover on buffer steps between this acreage and the Public and Highway 101.

In closing I hope you take farther testimony before changing the initial Estuary Committee's approval of this area which was Industrial.

Respectfully submitted,

Glae C. Gould
Coos Bay Timber Operators

GCG:eg

March 5, 1974

Mr. Cal Heckard
Advisor to Dunes Park
P. O. Box 539
Coos Bay, Oregon 97420

Dear Mr. Heckard:

It was suggested I submit a letter relative to some historic facts pertaining to the Hauser Station area and how it might effect present and future steps by you and other advisory and action committees-dealing with Dune Park affairs.

I want to reassure you that my relations with the Dunes people have been very good, to the point of being cordial. I none the less must take a somewhat different approach to the subject we recently discussed but hopefully not enough to disrupt past relations.

As I first asked you on the phone, has there been public meeting in this area to seek information on which to base a decision. I would take a dim view if the only meetings have been held elsewhere than the particular county when there becomes a problem, is this case Coos County.

I will just list a few subjects which should have been understood prior to any decision. From them you can see if any or all were brought out.

1. Can it be shown that the initial railroad into this area was sponsored or involved in any way by the Right of Way being provided with some timber lands exchange from the government. If so, I would feel that the purpose of the rail as it effects transportation must be weighed heavily in matters of transportation and manufacturing in the immediate vicinity of said railroad track - remember that Hauser siding is one of the longest and historic of any siding north of the yards in North Bend.
2. What is the relationship of this particular trackage and industrial site to the area to the East. In particular, I refer to the Elliott State Forest which is a young forest. The harvesting and thinning of trees such as the pole people use, need, and actually perform the thinning services which in the end fattens our own State of Oregon school funds. Do you recognize that two arterials from this said forest exhaust onto our 101 at Hauser and that the refusal of this processing at Hauser would burden the highway unnecessarily and at the same time be questionable in today's view of energy and resources

criteria.

3. Are you giving full weight to the fact that all industry has many environmental regulations and together with those that the park people should enforce, could actually produce manufacturing firms which are strange, and very interesting to the preference of visitors to the Dunes Park.
4. Have you actually sought the pre existing rights of this properties in question. I came to Hauser in 1949 - there was industry then before we including two sawmills which relied directly on the 1/2 mile long Railroad siding for the remanufacture of their products and loading thereof on same said railroad siding.
5. Are you aware that every person with whom I have been acquainted in this Hauser station area have been holding property for this long awaited industry market?
6. I am sure you must be aware of the immediate surrounding to know that both the park and highway 101 are perfectly situated to afford seclusion, from the esthetic point of view and buffered so that any operation along the tracks would not be known to tourists on Highway 101. You surely must know that the trains themselves climbing this grade here makes a great deal more noise that what is developed from peeling poles.
7. I want to state on my own memory, that it was not possible for our firm to find any spur track or siding back in 1949 to load lumber and poles from anywhere south of Hauser and that this fact was the prime reason that our planer and dock facilities were acquired at Hauser. We still have some but we at one time had under lease the major part of this railroad siding that you may not being giving full consideration to. I believe that it would be possible to establish that the entire length of this siding was under the exposure to industry and hence should benefit from "Pre existing rights." I would, I believe go as far as to say that any acreage that Mr. Wilfert had purchased should be considered industrial. What other use could any of you suggest he would purchase this for, except expansion.
8. I believe that the area around Saunders Lake and the South end of the Sand Dunes where they have been un-related, and perhaps that part also easterly to the shoreline of North Slough could well be defended for it's scenic view. with the exception that SouthernPPacific must be granted proper authority to abate the intrusion of blowing sand upon their R/W.

9. I am led to believe that there is an attempt by some so called planners to promote a "by pass" or "over pass" of the Coos Bay area using Hauser as the start and placing said highway west of the railroad all the way to the bay to include a combination rail and auto bridge, and then hedge hop over all the street of North Bend and Coos Bay. Though this route is unrealistic I would caution you to beware. One of the proponents was a well known marine biologist and another has convinced himself he knows the most regarding transportation when actually he is thinking of promoting only his home town tourism.

Please put some of these thoughts in the mill and see how it comes out. I trust you know that even a mess can be made to look tidy and there are areas where stringent rules should apply. I'm aware of what the Jones people are seeking out. I think in historic instances they too must yield, but not before instituting some rigorous controls.

Thank you.

Respectfully,

Glae C. Gould

CC:er

INDUSTRIAL FORESTRY ASSOCIATION

SERVING FOREST OWNERS, LOGGERS, WOOD USERS
THROUGHOUT THE DOUGLAS FIR REGION

1220 S.W. COLUMBIA STREET
PORTLAND, OREGON 97201

December 11, 1974

Telephone:
(503) 222-9505



Mr. T. A. Schlapfer, Regional Forester
U. S. Forest Service
P. O. Box 3623
Portland, OR 97208

Dear Mr. Schlapfer:

We are writing in response to your request for comments concerning the proposed management plan and draft environmental statement for the Oregon Dunes National Recreation Area. We have reviewed the proposed management plan and the wilderness suitability report along with their respective draft environmental statements. The facts are presented clearly and the analysis of wilderness suitability and overall environmental implications are commendable. We support your proposed management plan for the entire area.

We believe your plan is in line with the directions given for management of the Oregon Dunes National Recreational Area in Public Law 92-260. We do not believe any of the Dunes Area should be classified as wilderness. Such classification would directly conflict with the provision of P.L. 92-260 which provides for continuation of existing uses of private lands including residential, industrial or commercial sustained yield timber harvest and private non-commercial recreation uses without threat of the Government exercising its right of eminent domain. The other necessary management activities, including water utilization and forest protection, further support your conclusion that the Oregon Dunes Area is not suitable for wilderness designation. We believe your plan provides adequate provision for management of the area to protect it from destructive development or activities.

We hope these brief comments will be beneficial to completion and implementation of your proposed management plan.

Very truly yours,

A handwritten signature in black ink that reads 'W. D. Hagenstein'. The signature is written in a cursive style.

W. D. Hagenstein
Executive Vice President

WDH:rc

cc: Max Schmidt, Jr., Pres., IFA

MR. PEDRICK: My name is John Pedrick. I am speaking for Friends of the Earth and the Oregon Conservation Commission.

I am currently a law student at Lewis and Clark College in Portland. I am a coastal planner and I would like to go on record as being one coastal planner that is in favor of the designation of this area, so unique to Oregon, as a wildlife area. I really don't want to say too much more about that because my colleagues have said everything I have to say.

I would like to raise some related problems that come to mind to me as a planner and as an individual. The first problem I would like to raise is that of policing ORV, off-road vehicle, use to keep them within the boundaries proposed by the Forest Service.

This is what I call a nice try by the Forest Service and that's about all I call it because this nice try will not relieve the problem which will arise if you are preventing off-road vehicle drivers from leaving their designated areas, possibly inadvertently, possibly not inadvertently, and destroying delicate vegetation necessary for dunes stabilization and wildlife habitat, impinging with their noise upon the solitude sought by others and creating general nervousness among wildlife, not all of which are as imper-

turbable as the ubiquitous seagull.

The 12,000 acre area proposed for off-road vehicle use presents problems of policing which would require a management plan of its own involving the number and expense of policing personnel needed, citizen violation reporting systems and stiff penalties for violators, things like that. We must ask whether, considering the magnitude of the policing problems and other problems that have been raised here today with off-road vehicles, whether 25 more years of tolerance to off-road vehicles is worth the disturbance and the potential government expense they create.

Another problem arises in my mind on the possibility of breaching the foredune. We have heard a little bit about that and I would like to add a little bit more to it. The reason, again, for breaching the foredune, as you probably know, is to provide more sand in the dunes, to nourish the dunes, to feed them, to keep them from moving eastward, flattening out, and so on, and also to prevent their vegetation.

The questions raised in my mind include, will breaching the foredune remove the protective seawall the foredune provides against storms, allowing excess sand and debris to be carried inland to the rivers, recreational facilities and perhaps in an extreme storm situation even over to Route 101.

The second question: Will breaching the foredune rob the beach of sand to feed the dunes -- kind of a rob Peter to pay Paul situation, that possibility arises -- this is a difficult trade-off decision and quite possibly a costly intervention in what is now a natural process if the beach shrinks as sand migrates inland to feed the dunes. If this occurs, we are then in the position recently faced by the Army Corps of Engineers who had to give up their costly and fruitless attempts to maintain Cape Hatteras beachlines by artificial nourishment of beach sand. This was simply dumping more sand in to replace sand that washed away.

Thirdly, we must then ask the very basic and difficult question of whether there should be any attempt at all to maintain the dunes as vegetation bare walking dunes. I'm not coming out for or against this, I am merely presenting an alternative thought. We might consider leaving the foredune in place, regarding the vegetation of the dunes as a natural process which should be allowed to proceed.

The land would still be valuable for recreation, certainly very valuable for recreation, would attract still more wildlife and would serve as a great natural laboratory for education and research in coastal geology and habitat.

The last thing I'd like to bring up is or concerns the management plan. I know we're not suppose to talk about that today, but I won't be here tomorrow.

The management plan, appendix IV, if you happen to have read this, contains the descriptions. Appendix IV, page 9 and 10 of that appendix, Restrictions for Off-road Vehicle's Use.

Now, on page 9 of the appendix, subparagraph 1, there is a sentence saying "areas designated by cross hatching on the map are open for use by off-road vehicles." Yet, if you go to the back of the management plan and look at all the maps, there is a key on each map saying that cross hatched areas will be closed to off-road vehicles.

This is a point of confusion, to me at least. I think it might be some kind of a typographical error or a problem in the plan itself, but certainly it can lead to confusing interpretations.

It should also be noted that despite the key designation of cross hatched areas as closed to all off-road vehicles, the map in appendix V, pages 11 and 12, has no cross hatched areas on it. This map is the one that's referred to by the off-road vehicle restrictions on pages 9 and 10. It kind of seems strange there's no cross hatched areas on there marking or delineating areas where off-road vehicles cannot be.

In summary, I feel that the two areas deserving a great deal of further consideration of alternatives, and this is basically what I propose here is alternatives, are policing and restriction of off-road vehicles and breaching the fore-

dune.

The technical problems I've pointed out with the cross hatching was certainly a minor one, but I wanted to put it into the record and I hope it will be cleared up when the final management plan is printed.

DANIEL A. POOLE

President

L. R. JAHN
Vice-President

IRA N. GABRIELSON
Board Chairman

HARRY L. HAMPTON, Jr.
Treasurer

WILDLIFE MANAGEMENT INSTITUTE

Dedicated to Wildlife Restoration
WIRE BUILDING, WASHINGTON, D. C. 20005 (202) 347-1774

December 4, 1974

Mr. Theodore A. Schlapfer,
Regional Forester
Pacific Northwest Region
P. O. Box 3623
Portland, Oregon 97208

Dear Mr. Schlapfer:

The Wildlife Management Institute is pleased to comment on the "Environmental Statement for the Management Plan of the Oregon Dunes National Recreation Area." We have been interested in the Oregon Dunes area for many years and have actively supported establishment of the NRA.

In general, we approve the service's management alternative #F. This alternative provides for reasonable uses while protecting the resources. However, the plan could be strengthened and improved in several ways by more positive emphasis or clarification.

The focal point of the Oregon Dunes, and the principal reason for creation of the NRA, is the dunes themselves. Maintenance of the dunes in at least their present area is basic and overriding to all other management activities.

We have long believed that the elimination of the foredune is the only way to insure the long-term existence of the dunes themselves. Dr. William S. Cooper, in Coastal Sand Dunes of Oregon and Washington, in general agrees with this. We are pleased that the service recognizes the problem of sand recruitment, first on page 4 (Ecosystems), then explicitly on page 17 (Foredune), where it is noted that if beach grass on the foredune is not removed, "...the dunes as they are now known today will no longer exist within 90-200 years." This justification for immediate action, unfortunately, is compromised in subsequent sections; for example, on page 21 (Water and Soil), "Provisions will be made to breach the foredune in event it is necessary to perpetuate the dunal system" and on page 25 (D. Ecology), "Freedom to breach the foredune in the event it becomes necessary will guarantee continuance of the dunal system."

The impact statement officially recognizes the overriding problem of sand recruitment for the dunes, but it does not provide an immediate plan for tests or studies to solve the problem. That is the major deficiency, in our view.



Mr. Theodore A. Schlapfer
December 4, 1974

Closely allied with the foredune problem is the vegetation of the deflation plain. We recognize that vegetation succession takes place here, as described on page 4, column 3. We are pleased to see a restriction on expansion of artificial seedings of crops for wildlife on the deflation plain. We would urge an immediate combined wildlife and geological study to evaluate the effects of the existing seedings, particularly with respect to priority maintenance of the dunes. We were unable to find any discussions of possible effects of jetties on sand recruitment. It is a major factor in some areas, and should at least be mentioned for the NRA.

Wildlife habitat measures, other than the one involving seeding in the deflation plain, are sound and compatible with other NRA uses. Nesting platforms and duck nesting boxes are good. Studies may indicate good results can be obtained by a broader range of nest boxes installed on the NRA.

We are also pleased with recognition of the values of snags (page 17, Wildlife Habitat Improvement), and the need for their retention. We are concerned about the qualifications the report makes in later sections. On page 22 (Timber), "Salvage of hazardous, windthrown and dead or diseased timber will continue," and on page 25 (Fish and Wildlife), "...and retention of snags where possible." These qualifications should be deleted, and all dead, dying and diseased trees should remain, except for overriding reasons of human safety.

Several times the report discusses 'critical' wildlife habitat, yet no definition of 'critical' is provided until the Appendix II (page 7, column 3). Important terms should be defined early in the statement.

Rare and endangered (threatened) species are listed on page 8 (3. Wildlife), but are not discussed elsewhere in the report. Hunting regulations on page 16 (10. Hunting), are realistic and in line with long-term proposals made by the Institute.

We wish to make two suggestions for additions to the statement and management plan: (1) Consider some classification for a natural condition that is stronger than a management plan alone. Back country or roadless classification would be more palatable to wilderness advocates than a simple closure to motor vehicles, and (2) Immediate start of a wildlife ecology study, by the Cooperative Wildlife Research Unit of Oregon State University, with a goal of improved habitat management for non-game species.

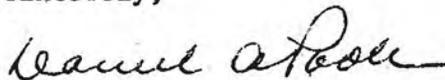
Again, we are pleased to see the forward steps outlined in the plan. All managers must remember that most people go to the Oregon Dunes National Recreation Area to see the dunes. All of them have a secondary enjoyment of seeing wildlife. Most management decisions will be correct if they recognize and encourage these two compatible and paramount factors.

Page 3

Mr. Theodore A. Schlapfer
December 4, 1974

If the Institute can be of any assistance in developing management plans on the NRA, we will be happy to help.

Sincerely,



Daniel A. Poole
President

DAP:mkv

THE WILDLIFE SOCIETY

OREGON CHAPTER

RECEIVED

LD

DEC 10 1974

FISH AND WILDLIFE



NATIONAL HEADQUARTERS
SUITE S176
3900 WISCONSIN AVE. N.W.
WASHINGTON, D.C. 20016

December 10, 1974

U. S. Depart. of Agriculture
United States Forest Service
P. O. Box 3623
Portland, OR 97208

Gentlemen:

In answer to your invitation to present views on your draft environmental statements for the Oregon Dunes National Recreation Area Proposed Management Plan and Wilderness Suitability, please find enclosed two statements from the Oregon Chapter of the Wildlife Society.

We appreciate the opportunity to review and comment on these documents.

Sincerely,

Francis Ives

Francis Ives
President

Act	F&W/L	Info
	Murphy	✓
	Phillips	
	Canutt	✓
	Capp	
	Adm. Asst.	

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Executi*

Statement of the Oregon Chapter

of

The Wildlife Society

Relating to the Draft Environmental Statement

on

Wilderness Suitability Oregon Dunes

NRA

Interpretations of the Wilderness Act, P. L. 88-577 will vary. After careful study, it is our opinion that portions of the Dunes National Recreation Area do qualify as wilderness as defined in the Act. Portions of the area are undeveloped federal land retaining its primeval character, have opportunities for solitude, are of sufficient size as to make practicable its preservation, and are high in scientific, educational, and scenic values.

The Oregon Dunes are unique, occurring nowhere else to this magnitude in other coastal areas. The Wilderness preservation system would be enhanced by the inclusion of a portion of the NRA.

Because of the importance of preserving the dunes against development and because no other classification offers equal protection against changes of administrative philosophy, the Oregon Chapter of The Wildlife Society recommends that the portion of The Oregon Dunes National Recreation Area between Tenmile Creek and Siltcoos River be designated "Wilderness" and managed accordingly.

Statement of the Oregon Chapter
of
The Wildlife Society
on
The Draft Environmental Statement
for
Proposed Management Plan
of
Oregon Dunes National Recreation Area

The Siuslaw National Forest can be proud of the excellent work of their inter-disciplinary inventory team and long-range planning team assigned to the Oregon Dunes National Recreation Area.

We concur with the basic concept of the plan to manage the area primarily for dispersed use while providing a broad spectrum of recreational opportunities, and confining developments to the perimeter, leaving the interior in a natural state. As professional biologists, we agree that this approach offers the best long-range protection for the great variety of unique habitats and wildlife present in this area.

With the following exceptions, we support Alternative F (the proposed action) of the Draft Environmental Statement:

1. We are fearful that this concept may erode under future pressures for development and for expansion of ORV areas or that administrators with different philosophies may seek increased development if portions are not protected by Wilderness classification. We recommend that the area between Tenmile Creek and Siltcoos River be so designated.
2. We support the two large areas for off-road vehicle use described in the Proposed Management Plan but object to the two ORV corridors added to the Draft Environmental Statement and recommend they be deleted.

x +

Mid-Coast Livability Council response to The Oregon Dunes National Recreation Area Draft Environmental Statement for the Management Plan

I. Introduction

- A. MCIC is a group of Florence area residents concerned about the environmental, economic and social livability of the central coast area.
- B. Commend Forest Service for its planning effort.
 1. Inventory of the land and its resources.
 2. Analysis of the suitability of the land for various forms of recreation.
 3. Solicitation of and responsiveness to public desires with the exception of wilderness. (71% of persons or groups responding to wilderness question favored wilderness)

II. Summary of MCIC Statement

- A. Support proposed management plan with some modifications, particularly of provisions that would conflict with future wilderness classification.
- B. Oppose Forest Service negative report on wilderness suitability. (~~Speak to latter first.~~)

III. Wilderness

- A. Significant portions of NRA are suitable for wilderness.
- B. Wilderness would give permanent protection to the scenic, scientific and other values while allowing all non-consumptive recreational uses.
- C. Wilderness would be compatible with nearly all provisions of the proposed management plan.
- D. MCIC wilderness proposal and response to Draft Environmental Statement on Wilderness Suitability will be presented separately at the wilderness hearing.

IV. Recreational Facilities

A. Campgrounds

1. Butterfield Lake--Request clarification as to size and location of the facility envisioned.
2. Driftwood--Support Forest Service plan to phase out this campground which now encroaches on Siltcoos estuary.
3. Waxmyrtle--Suggest phase out or relocation north of Siltcoos River to provide natural boundary for conservationists' wilderness proposal.
4. Umpqua Spit--Oppose this hiker-boater campground as it conflicts with proposed wilderness.

B. Day Use Areas including Parking Lots

1. Support generally plans to locate these on perimeter of NRA adjacent to Highway 101.
2. Carter Lake Picnic Area--favor relocation east of Carter Lake. (As well as solving flooding during periods of high lake levels, this might also reduce the need for future sand dune stabilization.)

- C. Access Roads--Concur strongly with plans to construct no new major roads within Dunes. Particularly, we would object to any that would penetrate the area proposed for wilderness.

V. Off Road Vehicles

- A. Observations in the dunes convince us that vehicles are damaging to the dunes, their vegetation and wildlife and that their use will ultimately conflict with other non-motorized forms of recreation.
- B. Support Forest Service proposal to limit vehicles to areas between South Jetty Road and Siltcoos River and from Tenmile Creek south.
- C. Would oppose any cave-in to pressures to bridge Tenmile estuary and to open up Umpqua Dunes Scenic Area including Lighthouse State Park. Also oppose allowing ORVs in Siltcoos-Tahkenitch area.
- D. Oppose strongly ORV corridor to beach near Threemile Creek and across Umpqua Spit to clam beds. ~~These were eleventh hour~~ Forest Service amendments to plan in response to pressure from Reedsport ORV advocates.*

VI. Sand Stabilization

- A. Approve Forest Service statement of intentions to limit stabilization to the very minimum required.
- B. Urge EIS and public hearing on any stabilization proposal. Stabilization to preserve one natural feature may simultaneously destroy another i.e. lake vs. sand sheet.

VII. Foredune Management

- A. Support limited experimental breaching of the foredune only if it appears that it is warranted to maintain the dunes.
- B. Urge EIS and public hearings on proposals to breach foredune. Impacts on wildlife might be significant.

VIII. Timber Management--Plan should categorically state that Forest Service will forgo any timber harvest on its own lands within NRA.

IX. Plan Review and Modifications

- A. Ten year management plan review should provide opportunity for public input comparable to that sought in the initial planning process.
- B. Any significant modification of the plan should require EIS and public hearing.



November 12, 1974

Mr. Theodore A. Schlapfer,
Regional Forester
Pacific Northwest Region
319 S.W. Pine Street
Box 2623
Portland, Oregon 97208

Dear Mr. Schlapfer:

This letter contains the comments of the National Parks and Conservation Association on the "Draft Environmental Statement for the Management Plan of the Oregon Dunes National Recreation Area" which you submitted to the CEQ on September 25th.

NPCA is a private, non-profit organization, educational and scientific in character, and with program areas in parks, wildlife and forestry. A large proportion of our 50,000 members live in the Pacific northwest region of the country.

These preliminary comments on the proposed management plan for the Oregon Dunes NRA derive primarily from my review of the draft environmental statement for this area, and, in addition, my visit to the Siuslaw National Forest and Oregon Dunes last year. In the way of a general observation, I was much impressed with the management direction that the administration of the Siuslaw National Forest seems to be taking, and I am hopeful that the Oregon Dunes area will reflect the same apparent sensitivity and foresight in its management and protection.

For the most part, I feel that the proposed management plan and draft environmental statement for the Oregon Dunes NRA is quite good, and certainly reflects a good deal of work on the part of the planning team. There are several areas, however, where I feel the plan or environmental statement are deficient, and these are elaborated on briefly as follows:

1. ORVs:

Of paramount concern to NPCA with respect to the proposed management plan is that this plan overemphasizes the use of

off-road vehicles on the NRA. The draft environmental statement is completely inadequate in its treatment of the environmental effects of ORVs on the many and diverse aquatic and terrestrial ecosystems that have been identified in this unique coastal ecotone. The suggestion is made, therefore, that an environmental assessment be carried out on those areas proposed to be zoned for ORV use in order that a better final decision might be made. By the same token, the adequacy or inadequacy of Forest Service enforcement mechanisms should be incorporated into the environmental statement since ORV trespass on fragile or restricted areas could easily impair the quality and use of such areas by others of the recreating public.

2. Proposed Visitor Center:

A second point or area which requires clarification, if not modification, is the provision for a formal visitor center. There is, of course, no question about the important functional role which such visitor centers play, but such an excellent facility already exists. This is the Cape Perpetua Visitor Center. If, for some reason, this facility is considered inadequate, the option might and should be explored to expand this existing facility as opposed to constructing and operating an entirely new visitor center. By the same token, expansion of the Perpetua Visitor Center could be reinforced or supplemented by informal visitor interpretive facilities located in key areas of interest throughout the NRA. It also occurs to me that this consideration is reflected in "Alternative A" of the proposed management plan.

3. Research Natural Areas:

For quite some time now NPCA has taken an active interest in need for and designation of research natural areas, and has been cooperating with the Federal Committee on Ecological Reserves in this regard. We are also well aware that the Northwest Region of the Forest Service has taken the lead in establishing a network of such areas for educational and scientific purposes.

It seems, however, that the proposed management plan could be more specific in terms of identifying possible candidates for research natural areas in the Oregon Dunes region. The plan does point out that 43 ecosystems (geomorphic units) or subsystems have, in fact, been identified in the NRA so it

would seem that the difficulty of identifying possible candidate research natural areas of a unique and representative nature has already been overcome. In this regard, I wonder if the "Oblique Dunes" might prove to be such a prime candidate in that (p. vii);

"These dunes are unique in that they seem to have no counterparts in other dune areas of the world, occurring only on the Coos Bay dunesheet of the Oregon Coast."

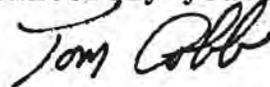
4. Sand Stabilization:

The final point or comment to which NPCA would like to address itself at this time concerns the Forest Service policy for protecting and managing the dunes themselves. This policy needs clarification. On the one hand, for example, the proposed plan outlines the need for manipulating the foredune while, on the other hand, other dune areas are being "stabilized" to minimize wind erosion. I would urge that a policy be formulated and adhered to which would allow only those management measures which would most closely allow for or ensure the prevalence of natural conditions. It has been my observation, in this regard, that a considerable degree of man-initiated or unnatural dune stabilization work has already taken place. This factor, plus possible chemical or mechanical dune manipulation work, must be reflected in the final environmental statement and plan for the Oregon Dunes NRA.

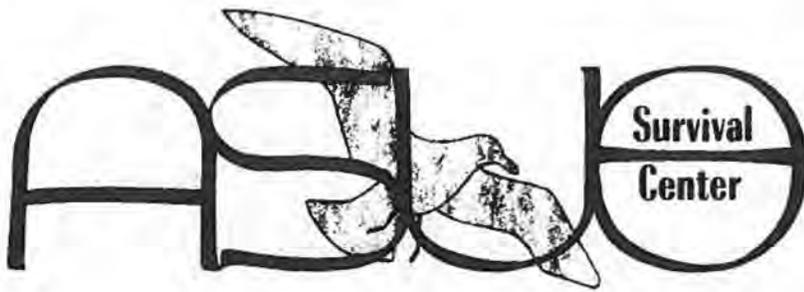
NPCA appreciates the opportunity you have provided us to submit our comments on the proposed management plan and draft environmental statement for the Oregon Dunes, and I am hopeful that these comments will prove useful.

With best wishes, I am

Sincerely yours,



Thomas L. Cobb, Ph.D.
Administrative Assistant
for Forestry



Associated Students—University of Oregon
M-111
Erb Memorial Union
University of Oregon
Eugene, Oregon 97403
(503) 686-4356

December 16, 1974

Mr. Theodore A. Schlapfer
Regional Forester
Pacific Northwest Region
Portland, Oregon

Dear Mr. Schlapfer:

The Oregon Dunes NRA Management Plan has given consideration to all possible recreation uses of this area. We generally support the DEIS as it stands, but would like to see the following clarifications and revisions in the FEIS for the Oregon Dunes Area.

A threefold increase in recreation use is expected by the year 2000. With this in mind, what long range plans do you have for the traffic problem on Highway 101? (page 6)

What plans are there to relieve the water shortage some communities are experiencing now during a dry summer? (page 26)

How will the increased motor boat use of the lakes effect the water quality? Can the timber on private lands, with the NRA, be clear-cut under Public Law 92 210? (page 9)

Please compare the following statements from page 14. "Campgrounds will not be elaborate but will cater primarily to those visitors who desire a camping experience associated with the outdoor environment and ready access to the NRA." and "Campground facilities will be designed or redesigned to accompdate a variety of users..."

Are laundromats and small grocery outlets needed with the NRA? (page 19) "...Support facilities are ~~bess~~ located outside the NRA" (page 22)

(page 10) "Problems will be solved on a case by case basis or deferred." Problems such as sand stabilization and foredune management should be evaluated at public hearings and require E.I.S. as should any major change proposed for this area.

We need more information regarding the large campground planned in the South Dunes area (page 14). How large? How close to Butterfield Lake? What type of facilities?

Theodore A. Schlapfer, December 16, 1974, page two

We foresee a possible conflict between users of the four small niker and boater campgrounds: How close to the lakes will these campgrounds be? How many people will they accomodate? Will the two uses of these camps be compatible?

We are opposed to the two corridors you have planned for ORV use (page 15). We would like to see the corridor from the proposed Threemile Road to the beach, and the corridor from the beach to the clam beds on the Umpqua North Spit closed to ORVs. Also, eliminate ORVs from the beaches adjacent to the proposed areas of ORV closure.

We would like to see these revisions and clarifications incorporated in the FEIS for the Oregon Dunes NRA.

We appreciate the opportunity to review this statement.

Sincerely,

Bill Floering

William J. Floering, Member
EIS Staff
University of Oregon Survival Center

267
COMMENTS BY THE OREGON ENVIRONMENTAL COUNCIL REGARDING THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE MANGEMENT PLAN OF THE OREGON DUNES NATIONAL RECREATION AREA. DEC. 10,1974

The Oregon Environmental Council is pleased with the opportunity to comment on and review the Draft Environmental Impact Statement (DEIS) for the Oregon Dunes Management Plan. We would like to congratulate the Forest Service on the excellence of its planning process. The public involvement and resource inventory are two aspects which show significant effort and concern by the Forest Service for broad ecological systems and the wide recreational interests of the public. While many positive aspects are evident in this DEIS compared to many we have reviewed, none the less, major deficiencies are evident.

First and foremost is the wilderness issue. In spite of the overwhelming public support for wilderness documented in the written public input (71% of the wilderness comments favored wilderness, over 40% of the returned questionnaires commented on the wilderness issue in a written note on the questionnaire), the Forest Service does not consider it "suitable" because of outside influences on the "aura or distinctive atmosphere" of a wilderness which the Forest Service concludes is part of the experience the visitor should have. In spite of the fact that a majority of the public finds that there is wilderness character in the Oregon Dunes at the present time, as evidenced by their written comments, the Forest Service insists that the Oregon Dunes do not have wilderness character.

Further, the Forest Service did not analyze wilderness as an alternative in the management plan DEIS. This is a major shortcoming in the analysis. Even the organic act of the NRA requires a wilderness review because of the uniqueness of the dunes. Separating the wilderness analysis from the management plan considerations goes against the public expectations for management of the dunes. It is remarkable that such a large number of responses from the public directly mentioned wilderness as a main concern in the NRA. Of all the complex and important management issues which exist in the Oregon Dunes, by far the largest area of public comment was wilderness

According to the public response analysis, the majority of the local and western Oregon input supports wilderness by a margin of 2 to 1 over non-wilderness. The regional and national interests supported wilderness by a three to one margin. Local groups also put together and supported an alternative wilderness plan because the Forest Service had not developed a wilderness alternative. We support this plan by the Mid Coast Liveability Council for an 18,100 acre wilderness in the Oregon Dunes NRA. Our testimony on wilderness was given in more detail at the wilderness hearings in Salem. A copy of our previous comments is attached.

A second major issue in the DEIS is the Off Road Vehicle Use Regulations located in Appendix 4 and in the management plan map. The impacts of ORV's on the ecology of the dunes and especially on the wildlife has not been critically analyzed. The 425 species of wildlife in the dunes is an unusual and unique concentration of species matched in Oregon only by the Malheur National Wildlife Refuge and the Klamath Basin. In spite of several available reports on the impact of ORV's on wildlife, including studies of snowmobiles in the Midwest, and in spite of reports on vegetation damage by ORV's especially notable in California; the DEIS mentions only that "accidental harassment of wildlife will increase" and "very little impact on the ecology of the area". With 10 rare and endangered species in the dunes, this incomplete analysis will not suffice. In fact, the Forest Service concentrates on describing minor impacts, implying by omission that the visitor taking pictures will have more detrimental impact than ORV's. "Occasionally birds will fly from their nests as curious visitors seek closer range for pictures or viewing."

The important issue in ORV use will not necessarily be the amount of use, but also its location. Areas of critical habitat which lie within the ORV use areas delineated on the map are bound to be the most impacted. The DEIS does not indicate which critical habitats may lie in the ORV areas. A similar problem exists where ORVs are allowed in a closed area. For example, the road to three mile lake and the corridor to the Umpqua Spit lie within an area supposedly closed to ORVs. This use corridor should be eliminated to protect the area with complete and total closure. Policing the corridor will not be possible, thus the existing closure will not protect the critical habitat or near natural condition implied in the management plan for three mile lake (the remotest lake in the dunes) or the spit itself (which will probably be designated a National Historic Site. The spit is also a critical habitat for pelagic birds during intense winter storms).

The last area of critical concern is beach grass stabilization and foredune management. The DEIS mentions that dunal processes will be modified to save values in and adjacent to the NRA, but does not delineate the extent and seriousness of these decisions as they affect the major resource of the NRA, the sand dunes themselves. The Oregon Dunes are unique in much of the world. No other dunes of this size are found in conjunction with the ocean environment. The giant oblique dunes are found nowhere else in the world. Without the open sand of the dunes, the critical habitat, the concentration of species and the prime recreation environment would not be possible. The precarious balance between stabilization of the dunes and influx of new sand (now impeded by the foredune) is not well discussed, nor is there a research or management plan spelled out for saving the dunes from complete stabilization by vegetation.

Admittedly, much needs to be known about the sand sources and flows, however, increased beach grass stabilization for recreation development parking lots and roads may spell the death knell for the dunes. An active research and management plan for the sand must be spelled out before the recreation plan can be accepted. The DEIS does not address itself adequately to this problem nor does the management plan specify a program.

In summary, we must congratulate the Forest Service for its lengthy planning effort and public involvement. We hope that the public input will be more fully utilized in the revised management plan and the final EIS, especially in the three areas of wilderness, ORV use and sand dune management.

Thank you for the opportunity to present these comments. Please include them in the hearing record.

MEI-
CHARLTON,
INC.

2340 S.W. CANYON ROAD
P.O. BOX 1048
PORTLAND, OREGON 97207
503/228-9663

ENGINEERING AND APPLIED SCIENCES working with MATERIALS ECOLOGY INDUSTRIAL PRODUCTS AND PROCESSES

December 12, 1974

Mr. T. A. Schlapfer
Regional Forester
P. O. Box 3623
Portland, Oregon 97208

Dear Mr. Schlapfer:

Re: Oregon Dunes National Recreation Area
Management Plan.

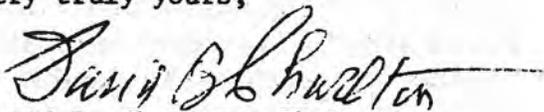
Recommendation:

I approve the Proposed Action G, starting on page 12 of the Draft Environmental Statement. My only qualification is that there might well be further restrictions on the areas available to off-road-vehicles. I presume that U.S.F.S. management can be modified in the future relative to vehicle access and other uses of the area.

I have been acquainted with the Oregon Dunes since 1944 and took part in many field trips to the area by the Portland Chamber of Commerce Recreational Resources Committee. The Chamber Board of Directors, of which I am a member, will act upon a resolution from the committee on December 13.

I am enclosing a copy of a brief which I prepared for the information of the Directors since some of them may not be very familiar with the area and hence not appreciative of its unique qualities and its national significance.

Very truly yours,


David B. Charlton, Ph.D.

DBC:lr

Topic

THE OREGON DUNES NATIONAL RECREATION AREA

Public Law 92-260

U. S. Forest Service

The Issue

Draft Environmental Statement for the Management Plan
CITIZEN COMMENT REQUESTED

The AREA

It is a long, narrow strip of land containing 32,186 acres and 38-1/2 miles of ocean beaches on the central Oregon Coast from the mouth of the Siuslaw river to the North Slough of Coos Bay. Most of the area is west of highway 101 and most of it is beach and sand dunes. However, there are a number of lakes and small streams which dissect the area. Of the total acreage, 6775 are privately owned (mostly forest lands), 3,153 are owned by the State of Oregon and 707 are owned by the counties. The very large but mostly undeveloped Umpqua Lighthouse State Park is within the area boundaries, while Tugman and Jessie M. Honeyman Memorial State Parks are adjacent to but outside the boundaries of the AREA.

Significance

In 1959 a Pacific Coast Recreation Area Survey report stated that "this area is adjudged to be of national importance, not only for the manifold opportunities for seashore recreation but also for the inspirational worth of the resources to the American citizen. The many superlative values found here are of such high importance as to warrant permanent preservation for the nation as a whole".

Background

Senator Richard Neuberger promptly (1959) submitted a bill (S1592) into Congress to provide for an Oregon Dunes National Seashore to embrace most of the above described AREA and to be administered by the National Park Service. During the next 10 years Congressional hearings were held on this first bill and subsequently on a number of others - in Reedsport, Florence, Portland and Washington, D. C.

Basically the controversy was whether the AREA should be administered by the National Park Service with it's Seashore classification (as at Point Reyes, Cape Hatteras, ^{and}) or as a Recreation Area by the U. S. Forest Service which already had a number of forest camps in the AREA. Issues were raised such as the fate of the 3 State Parks and the management of fish and wildlife but one that was most crucial, or made so by Senator Morse, was the fact that under the Seashore management plan there was provision for property acquisition by condemnation but not on the U. S. F. S. administered proposals. There was owner lifetime protection should condemnation be found necessary but Morse won out and he had a lot of support from those who felt there would be less restrictions, ^{and} regulations relating to land use, forestry operations, water, fish and wildlife under U. S. F. S. management. Public Law 92-260 created the Oregon Dunes National Recreation Area in March 1972.

THE OREGON DUNES NATIONAL RECREATION AREA

Public Law 92-260

U. S. Forest ServicePortland Chamber of Commerce Involvement

The Recreational Resources committee has conducted many field trips along the Oregon Coast since 1944, most of which involved visits to the Dunes. In some cases our primary concern was with the AREA, - not just as related to the legislation since 1959, but, in 1955 with the work of the Soil Conservation Service in grass planting to control sand movement in certain dune areas, a practice with controversial aspects.

State Parks have been a major concern of this committee since the days of Sam Boardman, the first State Parks Superintendent. The control of water in the lakes of this area and the use of the water by a large pulpmill was one of our more recent concerns; likewise, the increasing use of sand dune buggies. Assurances were made by local people that zoning would be applied to the privately owned lands within and adjacent to the AREA and that additional measures would be taken so as to protect and enhance the beauty of its unique natural qualities. Unfortunately, there has been significant degradation. Now that there is an Oregon Coastal and Conservation Development Commission and an Oregon Shores Conservation Coalition as watchdog, things may be under control.

The serious effort by the U. S. F. S. to get public approval of a recommended management plan deserves our attention.

D. B. Charlton, Ph. D.

31

RECEIVED
WATERSHED MGT.
DEC 16 1974
F.S.
R-6

9 DECEMBER 1974

REGIONAL FORESTER
PACIFIC NORTHWEST REGION
P.O. BOX 3623
PORTLAND, OREGON 97206

DEAR SIR

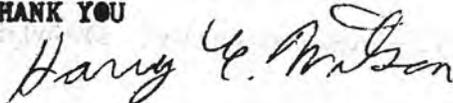
REF: THE OREGON DUNES NATIONAL RECREATION AREA, DRAFT
ENVIRONMENTAL STATEMENT FOR THE MANAGEMENT PLAN,
SIUSLAW NATIONAL FOREST, REPORT USBA-FS-R6-BES (ADM)
74-10

I AGREE WITH THE DRAFT ENVIRONMENTAL STATEMENT AS
PROPOSED WITH THE FOLLOWING EXCEPTIONS:

OFF ROAD VEHICLES SHOULD BE LIMITED TO A SMALLER AREA
BY ELIMINATING THE AREA SOUTH OF TENMILE CREEK.

ALTHOUGH IT IS NOT RECOMMENDED FOR WILDERNESS CLASSIFICATION,
THE DUNES ARE UNIQUE AND SHOULD BE PRESERVED AS MUCH AS
POSSIBLE.

THANK YOU



HARRY E. WILSON
POLARIS MATERIAL OFFICE
CHARLESTON, SOUTH CAROLINA 29408

name is John H. Critzer. I am present at this hearing today as a spokesman from my concerned family and that includes my wife, Betty, my daughter, Susan, my son, David, and myself, who reside on a farm in the small Oregon community of Noti, to voice our opinion on the wilderness suitability and the management plan aspects of the Oregon Dunes National Recreation Area.

For the social and ecological awareness as outdoor recreationists, proven conservation practices used in our farming operation, extensive examination of the Wilderness Suitability Report and the draft Environmental Statements on both wilderness and management, and after many at-home discussions, we have reached the following suggestive conclusions:

One, no portion of the NRA should be designated as a wilderness area.

Two, the entire area, except the four present designated summertime beach closures for off-road vehicles, should remain open for all.

Three, no further large or small area closures should be instituted in the final management plan to segregate or appease special interest groups or organizations.

Four, this one of a kind in the state of Oregon National Recreation Area should be managed in such a manner as to include all types of outdoor recreation activities in the NRA as a whole for the enjoyment of every one of its visitors.

Sincerely, Betty A. Critzer, Susan Critzer, David



Linfield College

Department of History

McMinnville, Oregon 97128

13 November 1974

Action
Infor.

Mr. Robert R. Tyrrel
Acting Regional Forester
U.S. Department of Agriculture Forest Service
Region 6
P.O. Box 3623
Portland, Oregon 97208

Dear Mr. Tyrrel:

I regret that I have been unable to attend the public hearings scheduled this week relating to the final environmental statements, wilderness proposal, and management plan for the Oregon Dunes National Recreation Area. I write to you because I still find some of my concerns, raised in an earlier letter, are not covered in the Draft Environmental Statement for the Management Plan published by your agency in the fall of 1974.

I am very concerned that your planning and management proposals do not take full cognizance of the cultural resources within the boundaries of the seashore area. Specifically I am concerned with the evident weakness of section 12, "Historical and Archeological" on page 17 of the published plan.

I have several questions which I, as a citizen of Oregon and a firm supporter of the National Recreation Area, would like to have answered.

#1 Why in the entire report is there no awareness that for the last 400-1,000 years (or longer) that this area was the home and tribal territory of the Coos, Lower Umpqua, and Siuslaw Indians?

- (1) Is not the prehistory, protohistory, and historic period of these Indians of significance in the scientific and recreational concerns for management of this area?
- (2) Is not the ethnobotanical interest of those presently interested in ecology and Indian cultures a subject that could be "lifted up" and interpreted to those visiting the Recreation Area?

#2 Why does one have the impression that the archeological site concern is woefully inadequate when reading the report?

- (1) When was the archeological site survey carried out within the boundaries of the seashore area?
- (2) Who was the contracting professional archeologist?
- (3) Did the final report of such sites gain entry into the files of the State Archeologist? Were the state files compared with the sites located by the on-site survey carried out for park purposes?
- (4) Has staff taken into account the full implications of environmental impact statement preparation when on page 17 appears the incomprehensible statement:

"In the event proposed construction unearths evidence of early habitation, its value will be determined before proceeding...."

Does not the preparation of an environmental impact statement indicate that resource concerns are evaluated before the bulldozers move in?

The above statement from page 17 of the published report leads one to conclude that archeological concerns have not been taken into account. How can you proceed with management plans and ignore this area of concern?

#3 Why is the entire subject of historical sites or locations hinged to the National Register? Most everyone knows that the National Register project is only getting underway in Oregon. At present but 75 some sites appear on the register for the entire state.

- (1) What efforts have been made to take into account historic sites of only statewide or local significance?
- (2) Why have none of the following sites received any evident consideration?

#1 Site of First Umpqua Lighthouse (1859)

#2 Site and structure of Second Umpqua Lighthouse (1894)

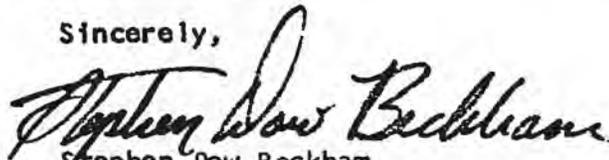
#3 Site of Umpqua Sub-Indian Agency (1856-1859)

What study has been done about the ramifications of the government policy of holding the Coos and Lower Umpqua Indians imprisoned at this site when they were neither prisoners-of-war or treaty Indians?

- #4 Sites of Indian villages on Umpqua estuary, Ten Mile Creek, and Siltcoos Outlet?
- #5 Site of "Survey Base Line" reaching the sea in the seashore area (laid out in 1854) which became the standard baseline for all land surveys in southwestern Oregon?
- #6 Sites of H.H. Barrett's stage landings (Umpqua and Siuslaw) and stage routes through the Oregon dunes
- #7 Sites of travel routes of Jedediah Smith Party, first white Americans to traverse the dunes
- #8 Sites of trading stations and camps of Alexander Roderick McLeod of the Hudson's Bay Company in the dunes area?
- #9 Development of cranberry industry in the bogs of the Oregon dunes in the 19th century with unique varieties of berries propagated in region?
- #10 Site of Umpqua City and impact of its speculators on the development of coastal Oregon?
- #11 Impact of the building of the railroad on travel patterns in the Oregon dunes?

As you are probably well aware, somewhere between 60-70% of American tourists rate historic sites as a number one priority when they visit an area. I do not find evidence in your management plan that you have really in any adequate way come to grips with a very important part of the recreation and interpretation potentials of the dunes seashore, at least, regarding cultural resources.

Sincerely,


 Stephen Dow Beckham
 Associate Professor of History

CC: Paul B. Hartwig
 State Parks Historian
 David Cole
 State Archeologist
 Jerry Baron
 Editor, The World, Coos Bay, Oregon
 Russell Anderson
 Chairman, Tribal Council, Coos, Lower Umpqua, Siuslaw Indians
 William Brainard
 Vice-Chairman, Tribal Council, Coos, Lower Umpqua, Siuslaw Indians
 Theodore A. Schlapfer, Regional Forester
 Pacific Northwest Region, Portland, Oregon
 Richard Ross
 Chairman, Oregon Archeological Association

To: Robert Tyrrel
From: Stephen Dow Beckham
Date: 13 November 1974
Subject: Draft Environmental Statement for the Management Plan

From reading my enclosed letter you will discern that I have confined my concerns to one segment of the published draft statement. I wanted to tell you that I find the overall presentation straightforward and easy to follow. You and your staff have done a very commendable job of soliciting the "public" for input and have labored diligently to order that data.

My concern principally arises in that the published draft does not, from my reading, fully take into account the cultural resources as part of the mandate in P.L. 92-260 which calls for recreation and conservation of scientific and historic values.

The report's graphics are pleasing, the narrative is well written, and the management alternatives presented for public scrutiny provoke thinking and study.

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