



February 22, 2006

Elaine M. Brong, State Director  
Bureau of Land Management  
333 Southwest First Avenue  
Portland, OR 97204

RE: West Eugene Parkway

Dear Ms. Brong:

I am not sure to whom this letter should be addressed. Several weeks ago in a meeting with Senator Ron Wyden, I raised the following issue and thought possibly a meeting with BLM would be forthcoming. It has not. I am concerned about BLM's having taken sides on the West Eugene Parkway, a project identified in the Metropolitan Planning Organization's listing of projects. This statement is based upon the following.

- In 1992 the West Eugene Parkway Wetlands Special Area Study showed the route of the West Eugene Parkway along the south side of the railroad line (see attached colored map – areas in red along the south side of the Southern Pacific Railroad line).
- The location of the West Eugene Parkway was later moved to the north side of the railroad line for reasons that centered on the south side having higher quality wetlands, with the north side, being lower quality agricultural wetlands.
- This change was documented in BLM's July 5, 1998 map, entitled "Amazon Creek Wetlands Section 1135 Project". According to this BLM project map, no wetlands restoration was to be done within 250 feet of the railroad line (see attached BLM map).

It is my understanding that wetland enhancement/ mitigation has, and continues to be, done in this 250 foot set-back area.

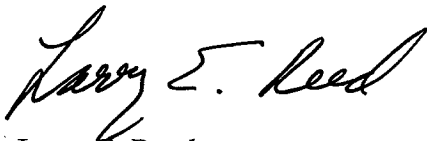
To repeat, BLM has taken sides by ignoring their own instructions to not do any wetland enhancement within the 250 feet along the north side of the railroad and, secondly, these enhancements are identified in BLM environmental studies as now being important wetland areas.

I am very concerned about BLM's conduct. Please look into this matter and advise me and the Metropolitan Planning Organization why the BLM did wetlands restoration in the path of the West Eugene Parkway north of the railroad line,

In addition, I have heard rumors that BLM is looking for any excuse to not be a party to any future lawsuit. Further, one way to do just that is, as part of the environmental review process, to find that the affected wetlands are too important and, therefore, leave it to the Federal Highway Administration/ ODOT to go it alone. I would like to remind the BLM public policy should not be decided based upon a fear of lawsuits. To do so means that policy will now be formed through the threat of lawsuits by the opposition, as opposed to upon its merits.

Please respond to this matter as soon as possible.

Yours truly,



Larry E. Reed  
Principal, Land Use Planner

cc: Gordon Smith, U.S. Senator  
Federal Building, Room 202 - 211 East 7<sup>th</sup> Avenue - Eugene, OR 97401

Ron Wyden, U.S. Senator  
Eugene Office - 151 West 7<sup>th</sup>, Suite 435 - Eugene, OR 97401

Peter DeFazio, U.S. Representative  
4<sup>th</sup> Congressional District  
Eugene Office - 151 West 7<sup>th</sup>, Suite 400 - Eugene, OR 97401

BLM Upper Willamette District  
2890 Chad Drive - P.O. Box 10226 - Eugene, OR 97440

Metro Policy Committee (MPC)  
c/o LCOG - 99 East Broadway, Suite 400 - Eugene, OR 97401

City of Eugene – Mayor and City Council  
777 Pearl Street, Room 105 - Eugene, OR 97401

City of Springfield – Mayor and City Council  
225 Fifth Street – Springfield, OR 97477

Lane Transit District Board of Directors  
P.O. Box 7070 – Eugene, OR 97401

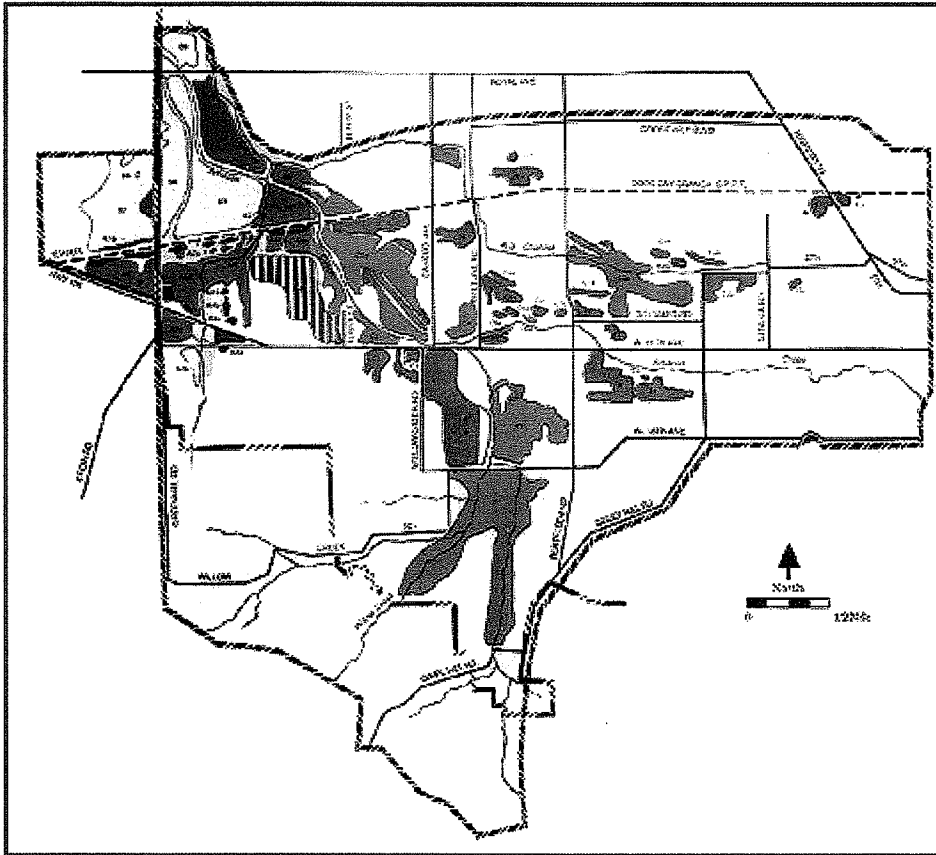
Lane County Board of Commissioners  
125 East Eighth Avenue – Eugene, OR 97401

City of Veneta – Mayor and City Council  
88184 Eighth – Veneta, OR 97487










City of Coburg – Mayor and City Council  
P.O. Box 8316 – Coburg, OR 97408

# Map 3

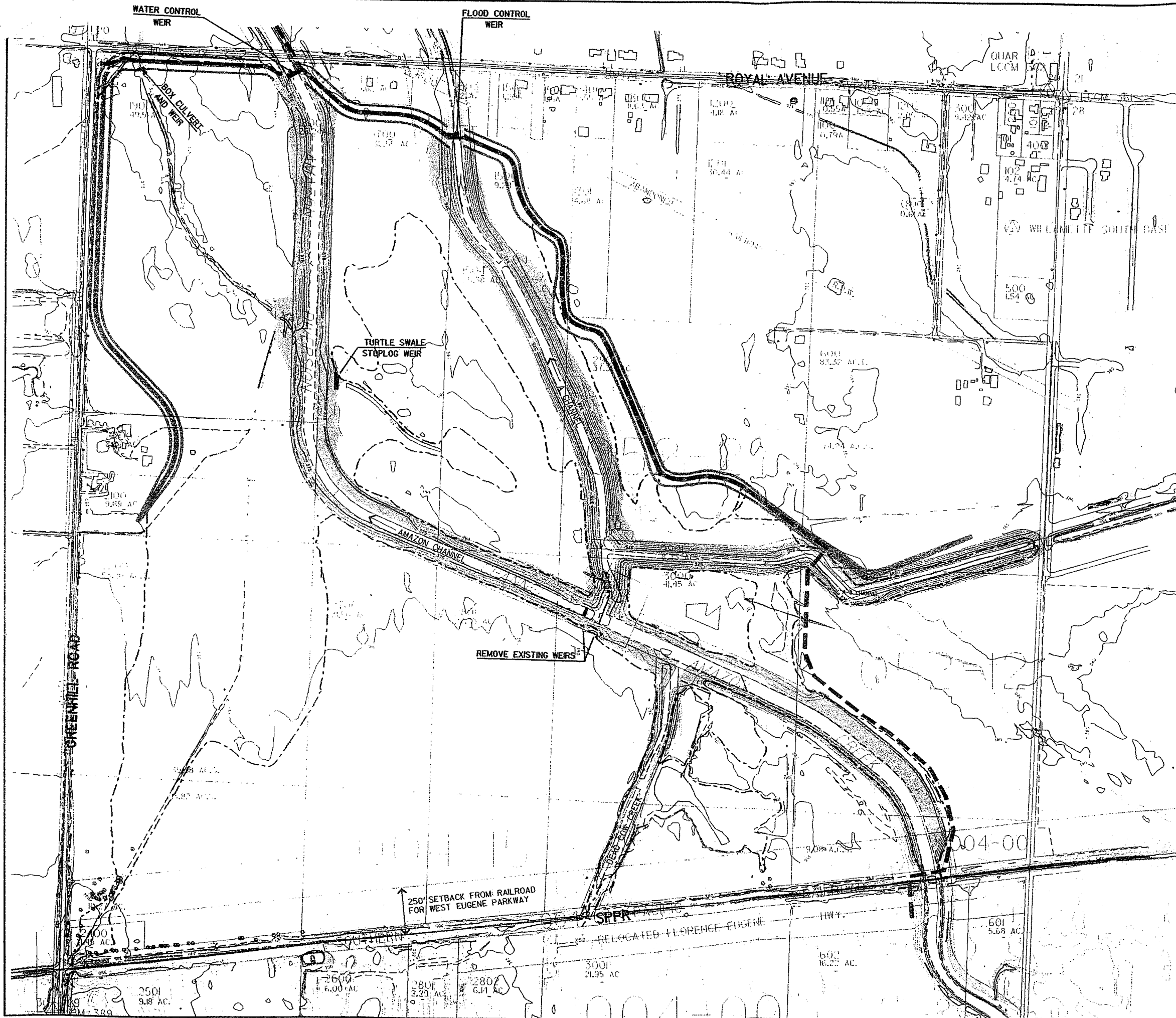
## M03: Wetlands Recommendations (WEWSAS)







### Map 3 Wetlands Recommendations

- |   |   |   |   |
|---|---|---|---|
|  | Wetlands to be Protected ( <i>Areas generally unsuitable for disposal of dredged or fill material</i> ) |                                  | Boundary of Regulated Wetland with Site Identification Number |
|  | Wetlands to be Developed ( <i>Possible future disposal sites for dredged or fill material</i> )         |                                  | Berm and Furrow Wetland Delineation                           |
|  | Wetlands to be Enhanced for Mitigation Credit   |                                  | Urban Growth Boundary   |
|  | Upland Mitigation Sites   |                                  | Study Area Boundary   |
|  | Streams to be Protected   | * Wetlands identified using the off-site methodology which are potentially regulated wetlands under further review. |   |

West Eugene Wetlands Special Area Study, 1992



**LEGEND**

-  LEVEE REMOVAL / CHANNEL RESTORATION
-  RELOCATED LEVEE
-  PROPOSED FUTURE LOCATION OF BIKE PATH (BY OTHERS)
-  TWO YEAR FLOOD LINE WITH PROJECT

NOT TO SCALE

**AMAZON CREEK WETLAND SECTION II35 PROJECT**

**COMPREHENSIVE PLAN  
(LOCAL SPONSOR PREFERRED)  
PROJECT MODIFICATIONS**

**FIGURE A**