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Att #1

Bureau of Land Management
Western Oregon Plan Revisions Office
333 SW 1st Avenue
Portland OR, 97204

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December 9, 2007

RE: BLM WOPR Appendix J

Having reviewed most of appendix J, I have the following concerns regarding your proposed action regarding offroad recreational use on BLM Lands.

1. Under "Limited Area Management Guidelines" bullet # 2. The plan states, "Motor vehicle use will be limited to administrative, commercial and passenger vehicle traffic where not specifically signed or gated." This should be followed by the words "except as follows" with bullets 3 thru 6 clarifying bullet # 2. The present wording seems to imply that the Limited Use Areas are closed unless posted open. Is that your intent?? I hope not because blanket policies never work well, you will lose the support of the entire offroad community, and it will be necessary to increase your signing and law enforcement budget amount by at least double what they are presently. Somehow I don't think that is likely to happen with current budget constraints. And I think we all know what happens to signs in remote areas by improper use of guns. I don't approve of it or participate in it, but that's what happens. Save yourself some grief, change the wording.
2. Under bullet # 3, regarding the wording "road and trail network as mapped", whose or to which map are you referring?? Internal BLM maps, forest management maps, fire management and suppression maps or public recreation maps. The recent new "Land of Umpqua Map" I purchased from the Roseburg BLM Office has substantially less information than older versions of maps of the same area. If you are trying to limit use by not including detail of some lesser used roads and trails, you will probably be successful, but will need increase the search and rescue portion of your law enforcement budget. Again, probably not going to happen. Having lived, worked and recreated in the Roseburg area for an extended period of time, much of the details are in my head or in the stack of old maps which I am NOT throwing away!!!
3. Regarding bullet # 5, "vehicles may pull off roads or trails to park or allow others to pass, up to 25ft. from centerline of roads or up to 15ft. from centerline of trails", how do you propose to enforce that one?? I am assuming that it is your intention to restrict the proliferation of new or unauthorized trails, which I can understand, but again for your law enforcement personnel to pursue and cite offenders, this will require a substantial increase in their budget.
4. Regarding "Closed Area Management Guidelines", I whole heartedly believe that there are areas that should be closed to motorized use, whether for other recreational uses, conflicts with other users, non-compatibility with terrain types, seasonal restrictions, and/or administrative reasons. You should have the qualified personnel to handle this and make good solid decisions with good solid reasoning behind them, not to mention legal precedent. Do what we are paying you to do!!

5. Regarding the "Process for ongoing public collaboration", thank-you. Partnerships may not be perfect but they do work. Please continue to improve relationships with other public entities, community groups, offroad clubs and associations. And thank-you for the opportunity to comment on the WOPR.
6. Under "Process for selecting a final road and trail network", thank-you for including an on-ground inventory. I have availed myself of aerial photography in my search for little used or old roads, skidroads or firetrails and get fooled about half of the time. Forget about new roads and trails, there are a substantial number old firetrails on ridges, old hand-built trailbeds approaching 100 years old, and more recently cat skidroads from the early days of logging that simply have been forgotten about and not maintained. With a minimum amount of maintenance they would make an excellent network of offroad trails that are already established Please don't blanket these as closed. Be site or area or drainage specific!!! If you can do it for a timber sale you can do it for offroad recreation!!
7. Regarding the "Hubbard Creek OHV Emphasis Area" in the Roseburg District, development of a contiguous trail system will be difficult because of other uncooperative property owners in the area. While I support development efforts in this area, I ask that you add the White Rock area (east of Myrtle Creek, Or) to the WOPR document as consideration for future development. If I count correctly, the BLM holds 18 connected sections of land in this area where problems with other property owners will not arise.

As to which alternative I support, presently I am in the no-action camp with leanings toward alternative # 2 but not a whole-hearted believer. I need to do some more reading. Thanks again for the opportunity to comment on the Western Oregon Plan Revision.

Sincerely,



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