

**001** 2012

# **Pacific Northwest Four Wheel Drive Association**

## **Washington - Oregon - Idaho**

---

*Randell Drake, Oregon Executive Director*  
*19210 Pinehurst Rd Bend OR, 97701*  
*541-419-9952*  
*[jRMDrake@msn.com](mailto:jRMDrake@msn.com)*

RMPs for Western Oregon  
Bureau of Land Management  
P.O. Box 2965  
Portland, Oregon 97208

RE: Comments concerning RMPs for Western Oregon

We again ask the United States Department of the Interior Bureau of Land Management Oregon's Office to take a hard look at the largest users of BLM lands and that is Class II OHVs which are currently using these lands. Ninety-seven percent of all units entering these acres will be in a Class II motorized vehicle and there is an inadequate range of alternatives being printed within these pages for all types of Class II OHVS. The range of alternatives should include from extreme (rock crawling at Shotgun OHV area) to easy shared use roads throughout these BLM lands. As always there is no range of use for Class II users. These miles of trails should equal Class I, Class III, and hiker trails that are mentioned within these books. We are the largest user group. Why are we not being considered for the largest acreages for our use? There is over two million acres of BLM lands within these pages and not a single letter written concerning the thousands of miles of trails Class II users will be allowed to use. Roads are not trails! Again we ask for accountability of this oversight. The largest user group should have the largest range of trails that included from extreme to easy trails for our use printed and drawn within these pages.

There are no play areas except the small area at Shotgun Creek that is even mentioned for Class II users. Play areas should number closer to a thousand acres throughout the brief pages. We the Class II communities of OHVs are not being considered as the largest user group needing play areas for our use within these pages. Instead of play areas hundreds of acres we have the least of all users on these BLM lands.

We should as a 'user group' have the largest voice impacting these lands. These pages do not reflect that the Oregon State office of BLM has engaged the Class II community to write any of these pages. It is apparent that the Oregon office of BLM is not taking a hard look at the Class II users that are using the public lands involved and will suffer the loss of access and right to use these lands. Instead creating a fair use of the land it is closing roads and areas heeding the words of anti-access environmentalist to closing motorized user from public lands. This can be seen from all alternatives, you are expelling the motorized public

from public BLM lands. A hard look needs to be taken by the Oregon office of BLM not to favor any one user group. A hard look by the Oregon office of BLM should not allow any comments or suggests from groups forcing other user groups from access of public BLM lands such as anti-motorized groups staged to close all Americans from public lands.

None of the Alternatives provide any trail mileage for Class II users. These alternatives 1-3 should have included the most miles possible for OHVs trail miles particularly Class II which have no real trail mileage. As stated above; shared use roads are not trails. We know you understand what Class II users are looking for in easy roads for our use. We understand that you understand what extreme Class II to users want by the example at Shotgun creek. We know you understand 'play area' as you have included the Lakeview District which has the largest play area in Oregon at Christmas Valley Sand Dunes. None of the alternatives provided offer a range for OHVs particularly Class II users who; by the words written within these pages are not being considered. The Oregon office of BLM needs to take a hard look at why it has not even attempted to include a range of use for all OHVs particularly Class II users. It is our contention that our group of users have been left out almost entirely, intentionally by the Oregon office of BLM.

The Oregon office of BLM did not engage the OHV community in any way and therefore very few miles of meaningful trail miles are included within the FEIS. Just road mileage is considered for Class II use and roads are not trails. The Oregon office of BLM needs to take a hard look at the miles of closed roads and open roads and create like amounts of open trails miles for OHVs particularly Class II. Most of the road miles closed should be reopened for OHVs. Most of the miles of open roads opened should allow that many miles of OHV trails to be designated. Thousands of easy Level I and level II roads should equate to a thousand miles of diverse trails from easy to extreme.

We are stating that the Oregon office of BLM did not go out of its way to involve Class II user groups. The reference page 923-986 does not list a single OHV group for OHV use information particularly Class II users. No information was gathered from expert OHV user groups or OHV planners yet this FEIS will eventually close considerable amounts of lands and existing road and trails to American citizens. This needs a hard look as the Oregon office of BLM did not seek professional or amateur advice in writing these pages concerning OHVs particularly Class II OHVs.

Land decisions that affect the public should include all users that are being closed out. Again as stated above the Oregon office of BLM does not list a single OHV expert nor has included any OHV user group, club organization which would explain the lack of meaningful OHV experience being included within these pages. Nowhere is listed the OHV experts or the OHV user groups that should have directed the writer of these pages of how, where, what etc... trails we expect. Yet we are the ones being closed out of these areas. The OHV community within this FEIS has nothing in writing but that five years from now OHVs possibly could be consider but nothing specific, especially concerning Class II OHVs. This is unacceptable! Each area should have had maps of existing trails and play areas and the trails and play areas that would be completed in five years. The purpose of this FEIS is to show us, the public exactly what is being done now and in the future so we can provide our

comments accordingly. What this means to us is if it is not in writing or on maps within these pages it will never happen. The Oregon office of BLM has not sufficiently considered OHVs particularly Class II users within the pages of this FEIS.

The Oregon office of BLM has not actively sought out our input how the closure to OHV use will impact us; the Class II community. They have not sought out how nor considered the impact of motorized use closures now and in the future and how it will impact the local economy. They have not considered the undue financial burden to the communities that are within the FEIS as the motorized communities are removed from these BLM lands. The Oregon office of BLM has not taken a hard look at the users historical use of these land in an OHV particularly Class II OHVs. The Oregon office of BLM needs to take a hard look at the OHV user groups being closed out of any area and include those OHVs in all final decision that is particularly about them. To leave the OHV community out of these pages and closing us out is just plain illegal and abuse of the authority by the Oregon office of BLM. This is wrong, immoral and illegal not allowing OHV users and expert OHV planners to impact this FEIS. Without our experts representing us throughout this FEIS it is legally void and the entire FEIS should be rewritten until it represents all of the current users of these lands. Again as stated above Class II users are the largest user groups using BLM lands.

Private land owners should not have anything to say about OHVs. Again the Oregon office of BLM is allowing private land owners to dictate how the public will be managed on public lands. These private land owners in most case detest any users but themselves particularly the motorized public. The Oregon office of BLM needs to take a hard look at extremely biased land owners when making decisions that affect public lands and there input needs invalidated; as it will always be closing the public off of public lands. We; as a public land user should be able to ride the fence line on the BLM side always and that should be spelled out in detail within the FEIS. No private land owner should be allowed to stop the public from using public lands. From hunting to open pit mining the public; not private land owners should be the ones allowed to keep public lands open to all Americans.

Wilderness Study Areas without being open to the public are Wilderness. Without the impact of man as he is using the lands will not allow a complete picture whether the lands are suitable for WSA. All existing routes through these WSA need to be left open to all users including OHVs. To single out a single group of users such as OHV use is discriminatory to the American people. There is no way to understand or consider WSA characteristic unless all of man's use continues. Our using the land as it is currently is being used is not being examined and therefore closing it to our use is wrong. To single out OHV/motorized vehicles as impacting a WSA only and closing our use only; off the lands is discriminating against individual Americans. As all discrimination is illegal this should be stopped at once. This hypnosis is flawed and is only promoted by anti-access groups that propose to remove all motorized use from public lands. WSA motorized routes should remain open for public use until deemed a wilderness to do anything else is discriminating against fellow Americans by a federal agency.

Our previous comments include these matters and are nowhere within the FEIS pages. Where are these addressed adequately within this FEIS? Our comments and record of public comments have not been provided from the public land users who are using these lands today. OHVs are being closed out for absolutely no sound or justifiable reason other than the Oregon office of BLM is systematically removing motorized use from their lands apparently. Public lands belong to the majority of the users currently using the lands. The Oregon office of BLM has not done an annualization of the current users of these lands within the FEIS. Therefore are not managing these lands per the majority of the current land users. From rock hounds, wood gathers, berry pickers, mushroom gathers, hunters, shooters, motorized sightseeing and driving for pleasure (one of the largest groups within these public lands) etc... are not even mentioned. These lands are used a particular way and the Oregon office of BLM is not taking a hard look at the current public land users. It is bias and discriminatory to remove the public from these lands just because it pleases the anti-access environmentalist and private land owners against motorized use on public lands. This is just plain wrong.

Our comments have been sent to local BLM offices within Region 6 of the Pacific Northwest Four-Wheel Drive Association for over 30 years now. We have commented over and over that the Oregon office of BLM which oversees these local offices is not listening nor are they reacting to our written comments throughout this state or our attendance at local meetings. There is not a single word of our previous attendances at local meetings or our written comments have been written into this FEIS. This is wrong and violates our rights to comment that justifiably make changes to the outcome. The Oregon office of BLM has asked for us to give them direction but your current direction is being driving by others and our comments are being completely ignored. This Oregon office of BLM needs to address and respond to the entire land users whether it is for work or play. It is apparent that none of the above mentioned users have effectively changed the outcome of this FEIS except the anti-access groups who oppose all motorized access for any reason. It is plain wrong to waste our time and efforts when the outcome has already been predetermined by the office of Oregon BLM.

Cascade Off-Roaders and others worked hard at Shotgun Creek area and there are no significant Class II trails in this area. Yes, there is an extreme rock crawl but that only satisfies a very small elite group of Class II users on mere acres.

The Roseburg Clubs have worked hard and not a single Class II trail has been established within the Roseburg BLM area. In the Hubbard area we have asked not to stop logging but to allow us continued use of the existing roads and trails at the local office. We have asked them not to rock these roads and trails but to leave them natural as possible. We have also asked (as in all BLM lands) that once the logging is complete the roads and trails are to be returned to the condition prior to the logging. This would be easy to do and we the PNW members would help pay or pay for it to be done. Please; as the Oregon office of BLM will you respect this request in all your districts? We have also asked (as in all BLM lands) that before decommissioning of roads that are made or trails worked during the logging process left open for our review. We ask this as many of these roads are now in the condition that would make excellent OHV trails that could be reused in the future for logging activities,

fire breaks, emergency responders etc... By leaving them open, roads that would provide very little user satisfaction could be closed instead. The end result would be an excellent OHV trails for Class II users that would be used over and over throughout the generations for work and outdoor recreation.

We have attended many of the Lakeview BLM public meetings, written comments and worked hard with them to establish our desire to have bona-fide Class II trails throughout their region but not a single Class II trail has been signed. We do have a portion of the sand dunes at Christmas Valley and that has been a continuous project since the early 70s to keep our access. This is wrong! Our access should be legitimized once and our use should be allowed forever. I don't see the 40 miles of Pacific Crest Trail being continuously under threat of closures by other public land users. Why is the Oregon office of BLM allowing the anti-access groups to daily, monthly and yearly threaten to close other public land users from our own public lands? The Oregon office of BLM needs to answer this. Once an OHV trail or other motorized route is established it is open for public use forever and ever without having continuous threats from the anti-access, anti-motorized groups. We want this answered! A motorized route is just as important to us as the Pacific Crest Trail is to them and we fail to understand the Oregon office of BLM's attitude in this matter. Why do we the public motorized land user have to continue fighting for our rights to use public lands?

The entire state of Class II users joined the Klamath-Falls Fourrunners in the Lost Project Area as presented to us by Don Holmstrom, Field Manager-Klamath Falls Resource Area. As to this date no play area has not be developed nor a single mile of trail around it has been signed. Some of these roads we asked to be left open are 38-6E-35, 39-6E-25, 38-6E-32, and 38-6E-33.1 and not a single mile has be designated as open to Class II use.

Many of us have tried to establish Class II trails in the Coos Bay area but as of this writing not a single mile of trail has been signed.

On page 398 is mentioned the Medford District OHV Emphasis Areas and we have protested this to the State OHV committed that the miles of Class II OHV are not trails but are shared use roads that is open to the general public or are just connectors between trails for Class I and Class III. These are not trails that would provide a range of alternatives for the Class II users. Listed on this page is 67,949 acres but there is not an extreme area or play area for Class II user. There is not a single mile of trail that could not be navigated by a low clearance vehicle such as a Honda Civic. Level I and Level II roads are for one level of Class II user and that is easy road four- wheelers. Once again there is no ranged of alternatives for all Class II users being considered within this FEIS.

Throughout the pages 388-399 are mentioned the same Level I and Level II roads are open to the Class II users. These are not trails but Shared Use Public Roads. This is being dishonest to the American public pretending that all users are being considered within these 1006 pages. We have asked repeatable for over 30 years that a full range of trails be considered for all Class II users just as all other motorized and non-motorized users are being consider within these pages. Each district needs trails and play areas that will cover a

full range of alternatives for the Class II users to enjoy the BLM land listed within this FEIS. Without this happening this FEIS needs to be rewritten until all outdoor recreationalists are treated fairly not favor any as stated in the CFRs and Draft Revised BLM Travel and Transportation Management Manual. This FEIS should not favor the non-motorized over the motorized public land user but it does. The Oregon office of BLM needs to take a hard look at and count the pages within this FEIS that favor the hiker and camper over the other entire public land users. This is wrong.

We do agree that logging and grazing is to be allowed on all BLM lands within this FEIS. It is our position that these should be managed for maximum use of our natural resources. Stated at our state meeting was this comment: "not to manage our natural resource for the American people would be violating our trust in the BLM Agency". Manage our lands for the majority of users and keep the land producing a sustainable resource for generations to come should be the job of the Oregon office of BLM. Locking tens of thousands of acre behind closed gates is not management of the land but locking Americans from accessing their own public lands. It is our belief you do not have the right to lock Americans from using ever acre that can possible be used for play or work ever.

The Bureau of Land Management needs to take a hard look at the historic, traditional, economic and social aspects of Oregon's public lands. Oregon's history, traditions, economy and communities revolve around our public lands and closing access to roads and trails damage and remove and destroy 'our Oregon.' OHV have been a part of the Oregon landscape before there was a Pacific Crest Trail. The office of Oregon BLM needs to do everything it is capable in making sure we continue being a part of Oregon landscape for the next 123 years. Whole communities make a living off OHVs such as the town of Christmas Valley, Oregon.

We feel you have the responsibility of managing these lands to provide motorized access and use of the resources of the land to provide for a diversified use of the land that enables all Americans the assess of our public lands for play and work. Closing a single acre of land is going against the best interest of the American people. Good land mangers find a way to steward the land allowing maximum yield and allow all to access it.

We cannot support this FEIS as it is written. It is not in the best interest of the American people and it should be thrown out and rewritten for all of us to access these millions of acres for work and play.

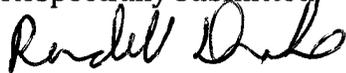
Thank you for allowing us to comment. It is our hope someone will read these many words and actually change the ROD favoring the majority of the current land users within this FEIS. For the Oregon office of BLM not to would be wrong.

Below are some of the clubs that belong to the Pacific Northwest Four Wheel Drive Association in the state of Oregon that use BLM lands in a Class II vehicle:  
Umpqua Valley Timber Cruisers  
Deschutes County 4-Wheelers

Strawberry Hill Four Wheelers  
Santiam Four Wheel Drive Association  
Pioneer Mt Rough Riders  
Harney County High Desert Wheelers  
Four Runners of Klamath Falls  
Ruff Country 4X4 Club  
X-treme Offroaders' 4 X 4  
Piston Wild of Oregon  
Cascade Cruisers  
Flat Broke&4-Wheeling  
Hubs in  
Mud-A-Rama  
Our Gang Off-Road  
Push-n-Pulls  
Sand Fleas  
Trask Mountain Trail Runners  
Vancouver 4-Wheelers  
Mud Puppies  
Those Guys off Road  
Trail Runners  
PNW Individual Member Club  
Wolfpack

Motorized vehicle use is a legitimized use on public lands. Class II is a legitimized OHV for use on BLM lands in Oregon. Our question to the Oregon office of BLM is why are there no Legitimize Class II trails on BLM lands throughout the state of Oregon within this FEIS. Why we were not included within this FEIS as experts formulating a range of alternatives for Class II opportunities on BLM lands? We ask the Oregon office of BLM why our written comments and personal comments at public meeting are not within these pages? Our main question is why a federal agency such as the office of Oregon BLM continuously ignores Class II user even though it is stated in the FEIS that we do exist. We would like to work with you in creating trails for the largest OHV group not only in this state but in this nation.

Respectfully submitted,



Randell Drake Oregon Executive Director

Randell Drake  
OR Ex Director PNW4WDA  
19210 Pinehurst Rd  
Bend OR 97701

**CERTIFIED MAIL™**



7012 0470 0001 9568 9027



1000

97208

U.S. POSTAGE  
PAID  
BEND OR  
97701  
JUL 05 12  
AMOUNT

**\$5.95**  
00010799-18

JUL 9 2012

RMPs for Western Oregon  
attn: Comments for RMPs for Western Oregon  
Bureau of Land Management  
P.O. Box 2965  
Portland, Oregon 97208

JUL 07 2012

*Hand copied*

9720832965 8010

