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9500 South Fork Little Butte Creek Rd.
Eagle Point, Oregon 97524

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RECEIVED

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Bureau of Land Management
Western Oregon Plan Revisions
P.O. Box 2965
Portland, Oregon
97208

Dear Sir or Madam,

This letter is in response to your request for comments on the WOPR section on proposed OHV use areas.

There are a number of reasons that the Lake Creek area of 8000+ acres could be seen as ideal for the recreational use of OHV owners and riders. Among those are:

- Pristine forest areas of secondary growth suitable for trail generation
- Spectacular scenery with much solitary ambience
- One of the most productive salmonid spawning grounds in the Rogue Basin
- Much acreage of hilly and rocky terrain so beloved of OHV operators
- Large tracts of pine/fir forest used by local ranchers for cattle grazing on BLM permit areas, interspersed with privately owned land currently in agricultural production

Unfortunately, these reasons for the area being attractive to OHV users are the same reasons for the Lake Creek area not being designated for their use.

First and foremost, we have to consider the reasons that OHV operators want the recreational space. Recreation. For taking their OHV's off-highway. Their aim is to find territory that hasn't been challenged yet and try to ride their vehicles through it. This includes not only trails and unimproved roads, but untrammelled areas that have seen only local game, the occasional livestock herd, and perhaps a few hunters in the fall.

This is not to disparage the entire population of OHV users, as most probably are responsible riders/operators and would follow the rules that the BLM would lay down for the area's use. Unfortunately, there is a small but significant portion of that population that is antithetical to those rules and would not be inclined to follow them ... and indeed would abuse the land that they find challenging.

As your experts know, these areas (particularly the higher altitude ones over 3000') are quite environmentally vulnerable ... taking years to recover after tightly controlled logging operations. The thought of just a few OHV tracks over this same territory and the consequent damage to the environment makes me shudder.

Having seen OHV parks in the past, the damage that is caused by these vehicles is totally out of proportion to their size. Most dirt bike riders view any steep hill as a challenge to see if their bikes can make it straight up to the top of the incline, spinning dirt and debris as far as is possible. The objective seems dual ... to gain the summit and to get as dirty as possible, going through mud if available.

There is an OHV recreational area east of the San Francisco Bay area near Tracy, California. I worked nearby at one of the test sites for explosive research. Each year they had to expend a significant amount of money to block off and repair hillsides that had been rutted vertically by myriads of dirt bikers. They had to scramble to get that repair work accomplished by the first rains, or the downpours would gouge out head-cutting ravines that would have been impossible to repair later.

In the Lake Creek area, the problems would be multiplied from this source alone. As your experts know, road runoff is one of the principal sources for stream contamination by sedimentation and turbidity. This in turn affects the spawning of the salmonid population in the South Fork of the Little Butte Creek. This tributary of the Rogue River is one of the principal sources of wild salmonid smolt in the Rogue Basin. I can only imagine the effect of hill-climbing OHV's forming ravines and vertical rills that would provide significant sediment and petroleum contamination to the watershed, and consequent damage to the salmonid population.

An adjunct to this destruction of the forest floor is the noise pollution. Much of this territory is interspersed private and public lands. Noise generated by these vehicles is loud and irritating and doesn't seem to respect property lines. The landowners in this area move out here and spend significant amounts of money for moderate to large tracts of land (at least by urban standards) so as to minimize their exposure to vehicular noise, as well as run agricultural operations (primarily cattle). This is a primary concern, since the mufflers on OHV's seem (for some unknown principle of mechanical engineering) to be the first part of the vehicle to either disappear or be damaged. The effect on the human population (not to mention the cattle) is significant and generates much ill will.

We also speak of the spectacular scenery, particularly at the higher altitudes. It is indeed that ... until broken by the sound of a chain saw or ATV. It significantly alters the experience. The winter situation at Yellowstone with the snowmobiles draws an appropriate analogy for the noise pollution.

Since this proposed territory is also multiple use land, there are significant numbers of cattle that are summered in the higher elevations. The ranchers that I know certainly don't entertain highly the prospect of a few rogue OHV riders playing cowboy and herding their cattle through the underbrush of those upland meadows. Not only does it endanger the well-being of the cattle from breaking legs or miscarrying calves, it makes them extremely difficult to round up in the fall, since the first sight of humans causes them to stampede in the opposite direction.

As we spoke of earlier, there is always a rogue element of this population of recreational riders and operators that will not adhere to the boundaries and regulations laid down by the BLM or Forest Service ... or any other entity, for that matter.

Since there is significant private/public land interaction throughout the Lake Creek area, it would be difficult for the enforcement people to keep these riders on the reservation once it is established. We have enough problems with trespassing riders and hunters as it is, and to attract greater numbers of these people to our area would make life that much more difficult for those of us that live here.

It would also seem that the large tracts of forest land in the private hands of the timber companies could become fair game for these riders ... causing damage and creating the potential of loss through wildfire.

Much of this area is off limits to any and all OHV's already from early summer through the first rains of fall/winter because of the extreme fire danger that regularly visits this area. While we manage to dodge the bullet most years for catastrophic wildfires, it is always on the minds of the local landowners that they could be burned out by the sparks of an illegal OHV operator during fire season.

We spoke in passing earlier about keeping these vehicles within the boundary of the recreation area, once established. Considering the significant private/public land interspersion in this area, it is difficult even with significant landowner effort and expense to post 'No Trespassing / Private Property' signs on all property boundaries. It is even more significant when the private timber properties are included, since these are seldom posted and the boundaries are not well marked.

The local law enforcement is currently understaffed and response times are long. For the upper South Fork Little Butte Creek landowners, the sheriff is usually over 45 minutes away and almost always has more priority complaints than trespassers in remote country away from the urban areas. I would question whether the BLM budget would provide adequate law enforcement to prevent these incursions and insure that compliance with the recreational site rules was enforced. And this doesn't even address the problems with OHV's that bolt the reservation and go off on their own sometimes miles from the proper site.

The local landowners here value our privacy. It is one of the reasons that we moved out here to begin with. We situate houses to be well away from the roads to eliminate noise. We post our 'No Trespassing' signs to keep uninvited guests from our doors. We have problems already with hunters, hikers, and poachers infringing on our land and virtually no recourse except to take license numbers and sign complaints. The addition of this OHV element to the mix would be to change the entire experience of those that live here, not only with increased road traffic, but from incursions by non-compliant OHV operators that have no regard for property lines or decorum of any kind.

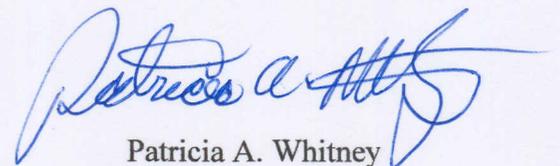
Given the problems with both the environmental damage and the enforcement issues, I would be very skeptical of the ability of the BLM to keep either factor from getting out of hand. In addition, I would assume that BLM would issue permits (for a fee, of course) to OHV riders to use the site. Would the estimated fees from this source cover the costs of remediation to the site each year, as well as the cost of fulltime law enforcement for the area? I think not, and with shrinking public sector budgets all around, this becomes a non-starter from the economic standpoint. The fee structure to make the site economically viable would be so high as to preclude most OHV users from using it.

In closing, PLEASE take the Lake Creek area off your list of possible OHV recreational sites. The environmental damage to the locale (both within and outside of the site) would be significant, and require a lot of time and effort to clean up. The damage to the cooperation of the local landowners would be far greater and take much longer to remediate.

All in all, the advantages of bowing to a vocal minority of OHV owners would not be outweighed by the long-term disadvantages of allowing this activity in this area.

Thanking you in advance for consideration of these comments.

Sincerely yours,



Patricia A. Whitney
Eagle Point, Oregon