



Pacific Northwest Four Wheel Drive Association

Washington - Oregon - Idaho

September 4, 2025

Objection Reviewing Officer
Region 6 Regional Forester
Pacific Northwest Region
USDA Forest Service
Attn: 1570/1950 Objections
1220 SW 3rd Ave
Portland, OR 97204

Re: OBJECTION to the Carbon River Landscape Analysis (CARLA) Project #65083 – Impacts to Motorized Recreation within this project area are noted below.

Access to public lands in this forested area is primarily achieved using motorized Off Highway Vehicles (OHVs), with 97.3 percent of users entering this way. Many individuals arrive prepared for activities such as camping, hiking, foraging, plant gathering, wood cutting, transporting additional OHVs, hunting, fishing, sightseeing, or exploring scenic locations. Some visitors seek quiet places on dead-end roads, while others operate various types of OHVs throughout the area. Currently, OHVs are the only practical means to access these lands. A significant number of people use this access for outdoor recreation.

Objection one: The USFS does not fully consider all motorized vehicle use in this area. Different levels involve various types of vehicles, yet not all are being addressed. The reasons for vehicle use have changed, which affects how USFS lands should be managed. Level- 5 through Level-1 roads have a specific user group that has not been identified by the USFS. Example: hunters, gathers of plants for food, just a slow drive through the forest to view plants and animals, remote camp sites, just parking undisturbed in a wide spot or dead-end road, etc. would use roads where others would not bother them. All would be in a motorized OHV of one class or the other but using a slower method of travel on a Class-1 or Class II roadbed.

Our objection to your plan is, do not close to any Class II or Class I roads as they are needed by more and more motorists. We understand that the logging and silviculture activities will use a lot of these roads to do their work. Please just restore them near to their original roadbed as possible when done. The work being done will occasionally have

erosion control as well and just leave it in place and leave these old ways, routes meandering through the forest.

The second part of this is why are so many using these old roads, way, routes through the forest today? It is simple that many have no other way to enjoy these public lands due to disabilities. I for example am old, disable war veteran, and have many medical problems that do not allow access through the forest except by using motorized routes that are open to me and thousands of others. These are our roads/trails to just slowly enjoy the forest at a speed we are able to maneuver our vehicles no matter what class of OHV it is.

Objection two: This plan does not appear to fully address the needs of citizens with disabilities who use these old roadways. Although the USFS states in the introduction that there will be no discrimination, not considering the specific needs of disabled individuals in relation to the use of these roadways may result in their requirements being overlooked. We need these old roadways for many reasons please don't lock disable humans from accessing all of the forest within this plan. There is much more to accessing the forested lands than a scenic park or being pushed around in a wheelchair. We have pride and can use our motorized vehicles to use these lands with our spouses, companions and friends. It is apparent that the USFS has not considered American Citizen with disabilities. Please reconsider our use within the Final ROD.

Objection three: we asked at public meetings and in writing that alternative to burning and filling the air with smoke to be used. As previously mentioned, we understand that a fuel laden forest is just waiting for a small spark to turn lands with no roads into an inferno. Destroying forest plants, animals in the ground, on the ground, and those that wonder or wing through the forest to death. Their homes and land they depend on for food will be but ashes. The air that each of these breath and humans alike will be affected and killing even more. The smoke and pollutants that rise with that smoke will fall about the surrounding land choking out the life of plants for miles in whichever direction the smoke goes.

There is no difference in a raging inferno or a man-made fire the result are the same as lost of life, habitat, contaminants in the air for all to breathe, their homes, and the loss of natural forest food is gone for years.

There are many alternatives to burning, either piled or just setting the ground ablaze. These include grazing, gathering wooded forest products and hauling them to Bi-mass plants to burn raw or made into forest products, chipping within the forest spreading them on roads and staging areas for dust control or just left spread on the forest floor for plant food. The wooden plants continue holding the carbon within them until the final decay happens. Logging by mechanical means and removing brush and grasses by hand. No modern country burns their forest down to keep them healthy. Well-spaced trees and plants to be used as carbon holders for generations. Why, because it works and the air is not filled with CO.

We object because only logging is considered instead of exploring alternatives to burning. This approach is limited and overlooks modern methods for maintaining forest health.

Restating again the one reason for land clearing by logging is important to the animals which feed within the forest. An old growth forest is almost void of plant life on the ground for large foraging animals. Clearings are important to the winged community as that is where rodents will abound and all types of plants with berries, grasses and seeds will grow more abundantly. This again is left completely out of your final decision. Why, the public does not understand the need, but the USFS does and should explain this important part of the ecosystem and it is not anywhere in the ROD.

Objection four: there is no reason to close any road due to stream crossings. Again restated from previous text we have worked with USFS for over 40 years creating means of crossing streams. The most obvious is a bridge but rocks can be used to harden many stream beds. Stopping erosion and silt from going down stream is very easily done. Seasonal use can also be an alternative of closing roads to motorized users. It is imperative that instead of closing a road other means of crossing streams should be included within this draft ROD. The USFS handbook address this and is utilized throughout the US why not in the PNW?

Objection 5: All existing roads open today is not enough to allow fire suppression equipment and men to get to fires quickly. Road condition and there are not enough roads to get medical aid throughout this forest quickly. Search and Rescue needs roads to find disable and lost within this forest and roads of all types are needed. Lost and disable humans need roads to follow allowing GPS guidance and phone service. We both agree roads are needed to log and further silviculture practice throughout the entire forested areas. The ROD draft mentions how important these roads from Level 5-Level I are for all of these reasons and more. Why are you then closing a single road or putting into storage a single foot of road? Does the USFS think any of the above has time to cut their way through an old roadway or an unmarked road to save a forest or a human life? The reasoning for closing any road is not acceptable. **Our objection is**, no roads for any reason should be closed that is at this moment being used by any motorized vehicles legally or not. The sad part of this is the management that closed these roads, and the forest burns or human life is lost will not be held accountable. Very, very sad.

The second part of this is the population of the nation, particularly the PNW is growing. The forested areas that are public lands are not growing. Every day more are looking for outdoor recreation and are arriving in motorized vehicles. The network of roads needs to be increased and not decreasing. Why is this not mentioned in the ROD the need for more roads, motorized routes, and ways for all the increasing use. The outdoor adventure is

finding place to use our OHVs that meet our different expectations of a great outdoor adventure. Putting more and more on a decreasing road system only means some will be making their own routes, ways as there are no new and challenging adventures to be had. It is simple if one can find a new route, road or way that is less traveled by the mass population it will be used if it is there to use. Closures are not management, and it will cause more harm to public lands than working with the public to find ways to keep all roads and land open if possible.

A footnote: most Level-5 roads are well maintained and are a quick way to get into and to a place within the forest. Although used by most it is not a quality adventure as it has two-way traffic at high speeds.

Level-4 roads are almost all gravel, two-way travel, a transportation road and a good way to get around from place to place but not fun getting dusted out even pulled over for a baby elk to cross the road.

Level-3 roads are dirt or gravel loosely maintained now, single vehicle with pull outs for those wanting to visit the forest as others zoom by and then still too fast for myself and many just to browse through the dust laden trees and vegetation.

Level-2 and Level-1 roads are very hard for most even to tell the difference from one to the other. The few that are maintained are too a particular area or place. Others just meander here and there and almost always natural to the forest dirt floor. These are the ones not maintained and are just right for **so many reasons**. Just as they are and the only reason to do anything is stopping erosion or the roadbed just might disappear from lack of use.

Objection 6: Evans Creek OHV area is open to all types of motorized vehicles. As stated previously the use envisioned has grown beyond expectations. It needs to grow as well, or an additional area found that is suitable for all types of OHVs. The overuse is the same as any popular area where the earth is being eroded by use. The original trails have grown wider not because rigs are getting bigger but because the obstacles become impassable by many. **We object for two reasons**, this is the time to expand this area by having more routes and why has the USFS not maintained this area just as you do anywhere else within the forest. Lack of maintenance and overuse of a small area is demeaning to OHV users by the USFS. OHV use is allowed on USFS lands just as hiking, biking, walking, sightseeing, etc. but for some reason our OHV trails and play areas are not maintained nor continuously increase as user numbers grow. WHY

We agree with the USFS that the bridge needs to be rebuilt so forest debris cannot damage the bridge. Our objection in this case is that it did not spell out how, when and that the structure will accommodate logging equipment, firefighting equipment, if possible two-way

travel for those crossing in recreational vehicles. It is our concern that with county bridge closed and if bridge is not rebuilt as you plan the area will be closed to most.

Objection 7: we would like clarity of the bridge for the reasons stated above not stopping the USFS from doing what they think best. It is our concern that if it is not spelled out very well within the pages of the ROD the environmentalists will do everything in their power to stop the bridge from being built. If you can move timber out of the forest and use it for fire fuel reduction, motorized access for OHVs, access across the Carbon River etc. it would be money well spent, and you would have our full support.

Objection 8: Is more of a concern and many of us take it very seriously. The USFS has plans to convert Level-1 roads into OHV trails or used exclusively by OHVs without public use or access. We see this as an opportunity for additional miles for us to use but after logging or silviculture activities is there a guarantee that it will actually happen in a timely fashion. The road or trail will be closed to use for a prescribed time to get the project done but what is the timeline for allowance OHV users to start reusing the route. Giving the example of Tillamook Forest it is generally less than a year from start of project until it is rehabilitated back close to what it was. However they have many other trails open while the project is ongoing. Our second concern is Level-1 roads never receive any maintenance as a road and have become very good OHV trails for use in the past. Can there be an acknowledgment it will not be maintained for administrative purposes but only for OHV use within the final ROD.

It is assumed that the old Level-1 road would only be used for fire/emergencies, future logging, removing fire fuel and then rehabilitating at the end of each project. With the exception of environmental damage such as erosion the Level-1/OHV trail would be left alone as it is used by the OHV users. I would like just a little more detail on this particular changing from Level-1 road to an OHV trail use. It is easy to see as in many forests the road number stays but it is signed OHV allowance which includes all four distinct classes of OHVs. It would be to advantage to both the OHV user and the USFS to have it spelled out in the final ROD.

Thank you for reviewing my objection and comments. Looking forward to hearing back.

Respectfully submitted by;

Randy Drake [REDACTED]
[REDACTED]

Oregon Director of the Pacific Northwest 4-Wheel Drive Association, member of Deschutes County 4-Wheelers, Chairperson of the Trail Task Committee, member of BRC