

OUTDOOR ALLIANCE

March 23, 2025

Kimberly Prill
BLM Oregon and Washington State Director (Acting)
Bureau of Land Management
U.S. Department of Interior

Submitted via: <https://eplanning.blm.gov/Project-Home/?id=a591dee8-500c-f111-8406-001dd8029ed0>.

RE: Comments on Notice of Intent To Revise Resource Management Plans for Northwestern and Coastal Oregon and Southwestern Oregon in Oregon/Washington and Prepare an Associated Environmental Impact Statement

Acting Director Prill and BLM Planners:

On behalf of the human-powered outdoor recreation community, we submit these comments on the Notice of Intent (NOI) To Revise Resource Management Plans (RMPs) for Northwestern and Coastal Oregon and Southwestern Oregon and Prepare an Associated Environmental Impact Statement.

Outdoor Alliance is a coalition of nine member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

In addition to these comments, Outdoor Alliance supports the comments of American Whitewater and International Mountain Bicycling Association. We hereby incorporate these organizations' comments by reference and have included them as appendices to this comment letter.



OUTDOOR ALLIANCE

Outdoor recreation is integral to western Oregon’s identity and economy. The region’s BLM lands include a wide range of high quality outdoor recreation opportunities ranging from frontcountry trail systems like Sandy Ridge, to multi-day rivers like the Rogue, to high-quality sport climbing at Eagles Rest. These recreation opportunities—many of which connect with nearby Forest Service, state, and private conservation lands—provide outstanding public health benefits to Oregonians and visitors alike and form the foundation of Oregon’s growing \$8.9 billion outdoor recreation economy, which supported 76,000 jobs and comprised 2.7% of statewide gross domestic product in 2024.¹

We are alarmed by the NOI’s singular focus on timber production, and we are concerned that, if implemented, the increase in commercial timber harvest proposed in the NOI will negatively affect the area’s outdoor recreation opportunities and their associated ecological and economic values in a number of ways. We ask that BLM reconsider its approach and instead pursue a collaborative public process that better sustains all multiple-use values, including outdoor recreation, consistent with the Oregon and California Lands Act (O&C Act) and the Federal Lands Policy and Management Act (FLPMA).

Our high-level comments include:

- The current RMPS, which were finalized in 2016, are currently appropriately balancing multiple uses, including outdoor recreation, across the planning area and do not need to be revised;
- The current 30-day comment period is too short to allow for meaningful public input and should be extended to facilitate informed public comment;
- The NOI fails to adequately address multiple-use values other than timber and is too vague to facilitate meaningful public engagement;
- The DEIS must fully evaluate the effects of increased timber harvest on outdoor recreation opportunities and on Oregon’s outdoor recreation economy;
- Any new plans must carry forward protective designations, including Areas of Critical Environmental Concern (ACECs) and Recreation Management Areas

¹ U.S. Bureau of Economic Analysis, Outdoor Recreation Economic Statistics, U.S. and States, 2024 (2026), available at <https://www.bea.gov/news/2026/outdoor-recreation-economic-statistics-us-and-states-2024>.



OUTDOOR ALLIANCE

(RMAs) that currently protect outdoor recreation opportunities, and should protect additional recreation opportunities through new designations; and

- Revised plans must maintain and expand protections for eligible Wild and Scenic Rivers.

Our comments are outlined in more detail in the sections below.

Inadequate Public Process

The BLM has not adequately engaged with the public for these RMP revisions, has not provided enough time for stakeholders to comment, and has not provided recreation (and likely other) stakeholders with the information necessary to understand the purpose and need or the scope of this RMP revision.

The existing plans were informed by an extensive public comment process that began with an NOI and associated 90-day comment period and included 41 public meetings, workshops, and forums. By comparison, we unaware of any outreach to stakeholders in the outdoor recreation community prior to the release of the current NOI, and a 30-day comment period does not provide adequate time to provide input on a proposal with such far-reaching implications for recreation and related environmental values like water quality, forest health, scenic integrity, Wilderness character, and more. We ask that BLM extend this scoping period to 90 days to address this deficiency.

Additionally, the BLM's estimated timeline for completing these RMP revisions (draft EIS in June 2026 followed by a final EIS in November 2026) found on the project webpage is too short to allow for meaningful environmental analysis for a project with such a wide range of significant environmental impacts.² We ask that BLM expand this timeline in order to allow for a robust analysis that satisfies the agency's responsibilities under the National Environmental Policy Act and other applicable laws.

² See, <https://eplanning.blm.gov/Project-Home/?id=a591dee8-500c-f111-8406-001dd8029ed0>.



OUTDOOR ALLIANCE

BLM Must Address All Multiple-Use Values

The NOI itself does not include the details necessary to understand the scope and expected impacts of BLM’s current proposal and does not provide adequate justification for revising the current plans, which are only a decade old. The NOI’s Purpose and Need focuses narrowly on increasing timber output, describing a major change in the way that Western Oregon’s BLM lands are to be managed, while only briefly and vaguely referencing other multiple-use values such as recreation. This singular focus on timber production fails to satisfy the requirements in both the O&C Act and FLPMA that require BLM to manage public lands for multiple uses, including for outdoor recreation.

Outdoor recreation is a “principal or major use” under FLPMA, alongside domestic livestock grazing, fish and wildlife development and utilization, mineral exploration and production, rights-of-way, and timber production.³ Similarly, “providing recreational facil[i]ties” is a purpose of lands administered under the O&C Act, along with timber, watershed protection, streamflow regulation, and supporting local economies.⁴ Any RMP revision for these lands must adequately address all of these values rather than prioritizing timber over other uses of public land.

Timber Harvest and Outdoor Recreation

The NOI proposes a dramatic increase in timber harvest in order to align with “historically higher levels of production on BLM-administered public lands,” citing high harvest levels in the 1960s and 1970s that would represent a roughly 400% increase in timber output over current levels. In describing alternatives, the NOI describes a preliminary action alternative that would “provide a sustained yield of timber production consistent with the maximum productive capacity of the lands.” While the NOI mentions wildfire risk mitigation as a potential benefit of increased logging, it does not express an intention that wildfire resilience will be a primary goal driving where and how timber projects will be conducted.

We are deeply concerned that increasing timber output to the levels mentioned in the NOI will lead to projects that degrade outdoor recreation values including

³ 43 U.S.C. §§ 1702(l).

⁴ 43 U.S.C. §§ 2601.



OUTDOOR ALLIANCE

scenic character, access, and water quality, and in turn harm outdoor recreationists and outdoor recreation businesses that rely on visitation to BLM lands. While timber harvests can co-occur in areas with high recreational use, research shows that timber harvests can deter recreational visits, especially during the year of harvest,⁵ and that recreationists tend to prefer areas with higher naturalness and scenic quality.

At a minimum, the DEIS must include a robust analysis of the following issues related to increased timber harvest within the planning area:

- The effects of increased timber harvest on recreation settings and scenic values;
- The effects on Oregon’s outdoor economy, including the effects on local businesses from a potential drop in tourism due to decreased scenic and ecological integrity from increased timber harvest and the increased presence of commercial operations on the landscape;
- The role that protective designations including ACECs, RMAs, and Lands with Wilderness Characteristics play in protecting outdoor recreation opportunities throughout the planning area, and the effect that a potential loss of the protections might have on outdoor recreation under a revised plan; and
- The effects of closures of public lands on outdoor recreation access due to timber operations.

This information is essential in order for the BLM and the outdoor recreation community to fully understand the environmental, social, and economic implications that this RMP revision has for Oregon recreationists and the region’s outdoor economy.

Protections for Outdoor Recreation Opportunities

The planning area contains a wide range of locally, nationally, and even globally significant recreation destinations. Outdoor Alliance maintains a

⁵ Kelly Wallace, Jordan Suter & Daniel W. McCollum, *Camping in Clearcuts: The Impacts of Timber Harvesting on USFS Campground Utilization*, 44 **J. Outdoor Recreation & Tourism** 100690 (2023), https://www.fs.usda.gov/rm/pubs_journals/2023/rmrs_2023_wallace_k001.pdf.



OUTDOOR ALLIANCE

comprehensive—though necessarily incomplete—geospatial data set of human-powered outdoor recreation resources on public lands and waters.⁶ Using this dataset, we completed an analysis of these outdoor recreation resources on BLM lands within the planning area, which include:

- 366 miles of trails
- 214 miles of mountain bike-accessible trails
- 36 climbing sites
- 150 miles of whitewater runs

We have included this analysis as Appendix 1 to these comments.

A revised RMP must sustainably maintain access to these recreation opportunities and must manage the landscapes surrounding them to support high-quality recreational experiences and to maintain and enhance ecological integrity. Many, but not all of these recreation opportunities are protected in the current RMP through planning designations that protect important resource values and prioritize land management actions that enhance recreation access. These protections, described below, must be carried forward, enhanced, and expanded in a revised RMP.

Recreation Management Areas (RMAs)

The existing RMPs manage certain recreational resources through a network of RMAs, including Special Recreation Management Areas (SRMAs) and Extensive Recreation Management Areas (ERMAs), that establish areas of public land where recreation values are recognized for their importance and recreation management receives specific management attention (including funding and staff resources) from the BLM.

We ask that all existing RMAs, including SRMAs, ERMAs, and Recreation Management Zones (RMZs) be carried forward in the revised RMPs. We also ask

⁶ Outdoor Alliance manages a database of human-powered recreation resources, including trails (hike, bike, and ski), climbing areas, whitewater runs, and river access points sourced from onX Backcountry's Adventure Projects and American Whitewater. These national datasets were used in this recreational resource inventory.



OUTDOOR ALLIANCE

that timber harvests be deemphasized in RMAs such that only projects with clear benefit for wildfire resilience or public safety are allowed, while primarily commercial harvests such as clearcuts are found not appropriate for these areas. In all circumstances, timber harvests should not be allowed to degrade scenery, water quality, public access, or other recreation values in RMAs.

Additionally, we recommend establishing new RMAs to protect the following recreation resources not currently protected through an RMA:

- Southwestern Oregon RMP:
 - Expand the existing Rattlesnake RMA to encompass the entire Rattlesnake climbing area.⁷
 - Establish a new RMA encompassing the Sterling Mine Ditch Trail.⁸
- Northwestern and Coastal Oregon RMP:
 - Expand Eagles Rest Hiking/Biking Trail ERMA to include the entire climbing area at Eagles Rest.⁹
 - Establish a new RMA encompassing the Valley of the Giants Hiking Trail as well as paddling on the Warnicke Creek and the North Fork Siletz.¹⁰

Establishing and expanding these RMAs will help BLM manage important recreation areas not currently recognized in the current RMPs.

Areas of Critical Environmental Concern (ACECs)

While designated primarily to protect and prevent irreparable damage to environmental resources, ACECs are also highly important for protecting recreation resources, settings, and scenic values. ACECs both protect resources that

⁷ See, <https://www.mountainproject.com/area/106557406/rattlesnake>.

⁸ See, <https://www.mtbproject.com/trail/5725258/sterling-mine-ditch-trail-out-and-back>.

⁹ See, <https://www.mountainproject.com/area/119993066/eagles-rest>.

¹⁰ See, <https://www.americanwhitewater.org/content/River/view/river-detail/10822/main>; See also, <https://www.americanwhitewater.org/content/River/view/river-detail/10821/main>.



OUTDOOR ALLIANCE

recreationists value and help the BLM to ensure that recreational use does not unnecessarily degrade ecological characteristics of public lands. The NOI states that the BLM will be reevaluating existing ACECs and also considering nominations for new ACECs.

As we describe above, the current plans are largely working to protect recreational values, including through management of ACECs. We recommend that all existing ACECs be carried forward in any revised plans. In particular, BLM must maintain the following ACECs, which provide direct protections for important recreation opportunities:

- ACECs with recreation resources in the Southwestern Oregon RMP:
 - Brewer Spruce
 - Dakubetede
 - East Fork Whiskey Creek (WSR only)
 - Eight Dollar Mountain
 - Grayback Glades
 - North Fork Silver Creek
 - Old Baldy
 - Rough and Ready
 - Sterling Mine Ditch
 - Table Rocks
 - Upper Klamath River & Upper Klamath River Addition

- ACECs with recreation resources in the Northwestern and Coastal Oregon RMP:
 - Lake Creek Falls
 - Little North Fork Wilson River
 - Low Elevation Headwaters of the McKenzie River
 - Marys Peak
 - Middle Santiam Terrace
 - Nestucca River
 - New River
 - Sandy River



OUTDOOR ALLIANCE

- Upper Willamette Valley Margin
- Valley of the Giants
- Walker Flat
- Wasson Creek
- Willamette Valley Prairie Oak and Pine Area

Specific recreation resources protected by these RMPs are included in the GIS inventory provided in Appendix 1 of these comments.

The revised RMPs should also make clear that human-powered recreational uses, including hiking, trail running, climbing (including the placement and maintenance of fixed anchors), mountain biking, and skiing are allowed in ACECs.

Lands with Wilderness Characteristics

Outdoor Alliance recommends carrying forward all Lands with Wilderness Characteristics in the revised RMPs. In particular, we support continued protections for lands surrounding the Wild Rogue Wilderness. These lands protect a significant area of the world-renowned Rogue River whitewater run and have high value for primitive and unconfined recreation.

Protections for River-Based Recreation

The planning area contains a very high concentration of rivers used for whitewater paddling and other forms of river-based recreation, including congressionally-designated Wild and Scenic Rivers (WSRs). These include a number of high-quality whitewater runs that paddlers from across the globe travel to the region to experience. Sustaining these recreational opportunities and ensuring the ecological health of these rivers must be a central goal of the revised RMPs.

Retention of 2016 Eligible and Suitable Wild and Scenic River Determinations and Associated Management Corridors

Outdoor Alliance supports BLM's decision, as described in the Notice of Intent, to exclude Congressionally designated areas and National Landscape Conservation



OUTDOOR ALLIANCE

System lands from this RMP revision. This appropriately recognizes the statutory protections afforded to designated Wild and Scenic Rivers.

BLM should likewise retain and carry forward its prior determinations regarding eligible and suitable Wild and Scenic River (WSR) segments identified in the 2016 Northwestern and Southwestern Oregon RMPs. These determinations reflect substantial prior analysis and are central to BLM's obligations under the Wild and Scenic Rivers Act (WSRA) and its implementing policy.

The 2016 RMPs identified the following segments as eligible and suitable:

- McKenzie River, Segment A (NCO)
- Molalla River, Segment B (NCO)
- Nestucca River, Segment A (NCO)
- Siuslaw River, Segments B and C (NCO)
- Howard Creek, Segment A (SWO)

These findings represent BLM's considered judgment, based on interdisciplinary review, that the segments are free-flowing, possess outstandingly remarkable values, and are appropriate for potential inclusion in the National Wild and Scenic Rivers System.

BLM has stated that this revision will rely heavily on existing data and prior planning decisions. Absent new information or changed conditions, revising or discarding these determinations would represent a departure from BLM's prior findings without a reasoned explanation supported by the administrative record.

BLM policy further directs the agency to identify, evaluate, and manage eligible and suitable rivers to protect their free-flowing condition and outstandingly remarkable values until Congress acts or a subsequent planning decision is supported by appropriate analysis. Retaining both the determinations and associated management direction—including defined river corridors—is therefore necessary to ensure continued compliance with the WSRA and BLM's own planning framework.



OUTDOOR ALLIANCE

For these reasons, Outdoor Alliance requests that BLM explicitly retain all 2016 eligible and suitable Wild and Scenic River determinations and associated management direction in the revised RMP.

Wild and Scenic Rivers eligibility analysis should reflect Klamath River dam removal

We ask that the BLM evaluate Wild and Scenic eligibility of the stretch of the Klamath River from the J.C. Boyle Dam site to the J.C. Boyle Powerhouse (the “Big Bend reach”). This section of the Klamath was made free-flowing by a dam removal in the time since the 2016 Record of Decision and now possesses enhanced ORVs, including enhanced scenic values due to the removal of the dam site and associated infrastructure and enhanced recreational value for whitewater recreation due to the free-flowing nature of the river.

Riparian Buffers for Timber Harvest

The NOI states that the proposed action will reserve “streamside buffers ranging from 25 to 100 feet, depending on stream type, to comply with the Clean Water Act” from sustained yield timber harvest in the revised RMPs. Buffers of this size are not adequate for protecting river recreation and aquatic ecosystems. BLM must retain existing riparian buffers to protect recreation opportunities and to protect watersheds, as required by the O&C Act.

* * *

Thank you for considering our community’s input. We look forward to working with you to maintain and enhance the outstanding outdoor recreation opportunities found across BLM lands in Western Oregon.

Best regards,



Louis Geltman
Vice President for Policy and Government Relations



OUTDOOR ALLIANCE

Outdoor Alliance

cc: Adam Cramer, Chief Executive Officer, Outdoor Alliance
Heather Thorne, Executive Director, Access Fund
Beth Spilman, Executive Director, American Canoe Association
Clinton Begley, Executive Director, American Whitewater
Kent McNeill, CEO, International Mountain Bicycling Association
David Page, Executive Director, Winter Wildlands Alliance
Tom Vogl, Chief Executive Officer, The Mountaineers
Ben Gabriel, Executive Director, American Alpine Club
Madeline Bachner Lane, Chief Executive Officer, Colorado Mountain Club
Chad Nelsen, Chief Executive Officer, Surfrider Foundation



Appendix 1: Inventory of Human-Powered Outdoor Recreation Opportunities in the Planning Area

Climbing Sites in the Northwestern/Coastal Oregon and Southwestern Oregon RMPs

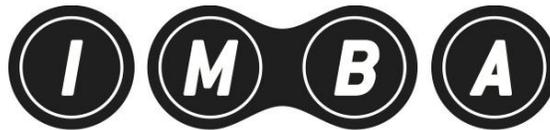
Climbing Area Name	Parent Climbing Area	# of Routes	Resource Management Plan	Area of Critical Environmental Concern	Recreation Management Area	Data Source	TOTAL
(A) Cloud Deck	Eagles Rest	3	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	None	onX Backcountry	36 climbing sites 204 routes
(B) Midgard	Eagles Rest	1	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	None	onX Backcountry	
(C) Dream Wall	Eagles Rest	17	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	None	onX Backcountry	
(E) Sun Deck	Eagles Rest	13	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	None	onX Backcountry	
(F) Bomb Shelter	Eagles Rest	14	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	None	onX Backcountry	
(G) Quarantine Wall	Eagles Rest	6	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	None	onX Backcountry	
(H) Studio	Eagles Rest	12	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	None	onX Backcountry	
(I) Wall Whitman	Eagles Rest	1	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	Eagles Rest Hiking/Biking Trail ERMA	onX Backcountry	
(J) Old Growth Wall	Eagles Rest	6	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	Eagles Rest Hiking/Biking Trail ERMA	onX Backcountry	
(K) Overstory Wall	Eagles Rest	5	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	Eagles Rest Hiking/Biking Trail ERMA	onX Backcountry	
(L) Lower Vista Wall	Eagles Rest	2	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	Eagles Rest Hiking/Biking Trail ERMA	onX Backcountry	
(M) Upper Vista Wall	Eagles Rest	1	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	None	onX Backcountry	
Bear Creek Boulders	Southwest Oregon	12	Northwestern/Coastal Oregon RMP	None	Hubbard Creek OHV ERMA	onX Backcountry	
Broken Arrow Spire	Lost World Spires	3	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry	
Chimney Pinnacle	Northwest Ridge	3	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry	
Conglomerate Crag	Greenman Crags	6	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry	
Dab Rig Boulder	Old miners camp	2	Northwestern/Coastal Oregon RMP	None	Quartzville Backcountry Byway ERMA	onX Backcountry	
Hidden Wall	Northwest Ridge	0	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry	
Loon Lake	Coastal Region	0	Northwestern/Coastal Oregon RMP	None	Loon Lake Recreation Area SRMA	onX Backcountry	
Moby Grippid	New Wave	1	Northwestern/Coastal Oregon RMP	Mary's Peak	Mary's Peak ERMA	onX Backcountry	
Moss Boss Boulder	Redneck Rivierra	1	Northwestern/Coastal Oregon RMP	None	Quartzville Creek and Yellowstone Trail ERMA	onX Backcountry	
Owl Slab	Marys Peak	8	Northwestern/Coastal Oregon RMP	None	Mary's Peak ERMA	onX Backcountry	
Pony Boy Boulder	Redneck Rivierra	1	Northwestern/Coastal Oregon RMP	None	Quartzville Creek and Yellowstone Trail ERMA	onX Backcountry	
River Boulders	Sitkum Boulders	0	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry	
Roadhouse	The Callahans	4	Northwestern/Coastal Oregon RMP	None	Quartzville Creek and Yellowstone Trail ERMA	onX Backcountry	
The 4.5 boulder	Redneck Rivierra	5	Northwestern/Coastal Oregon RMP	None	Quartzville Creek and Yellowstone Trail ERMA	onX Backcountry	
The Knob	Quartzville Scenic Byway	0	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry	
The Monorail Boulder	Redneck Rivierra	2	Northwestern/Coastal Oregon RMP	None	Quartzville Creek and Yellowstone Trail ERMA	onX Backcountry	
The Narrows	Southwest Oregon	1	Northwestern/Coastal Oregon RMP	None	Narrows ERMA	onX Backcountry	
The Top Honeycomb	Northwest Ridge	0	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry	
Yo Mamma	Redneck Rivierra	2	Northwestern/Coastal Oregon RMP	None	Quartzville Creek and Yellowstone Trail ERMA	onX Backcountry	
(4)The Cathedral	Rattlesnake	23	Southwestern Oregon RMP	None	Rattlesnake ERMA	onX Backcountry	
(5)Jane's Buttress	Rattlesnake	14	Southwestern Oregon RMP	None	Rattlesnake ERMA	onX Backcountry	
(7)Rainy Day Cave	Rattlesnake	11	Southwestern Oregon RMP	None	Rattlesnake ERMA	onX Backcountry	
(8)Dominator Wall	Rattlesnake	15	Southwestern Oregon RMP	None	Rattlesnake ERMA	onX Backcountry	
(9)Sunset Wall	Rattlesnake	9	Southwestern Oregon RMP	None	None	onX Backcountry	

Trail Name	Trail Length (miles)	Portion Overlapping BLM Land (miles)	Type	Resource Management Plan	Area of Critical Environmental Concern	Recreation Management Area(s)	Data Source	Total Trail Miles	Total Portion Overlapping with BLM	Portion %
16-7-11 Road	2.53	2.28	mtb	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry	714	365	51.17
16-7-12.2 Road	2.51	0.59	mtb	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry			
4x4 Trail	1.54	0.42	mtb	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry			
Alder Ridge Access	0.60	0.55	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry			
Alder Ridge Loop	1.40	0.03	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry			
Alsea Falls Complete Loop	11.99	11.70	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
Alsea Falls Trail	0.20	0.20	hike	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
Alsea Falls: Whistle Punk to Springs	9.19	9.19	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
Alsea River Trail	0.51	0.51	hike	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
Amanda's Trail	0.91	0.91	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Americorp Trail	0.42	0.42	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Amy Road	0.63	0.46	mtb	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry			
Ancholine	0.58	0.58	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
Ancient Forest Alternative Spur	0.10	0.10	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry			
Ancient Forest Riverside Trail	0.55	0.53	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry			
Annie's Cabin	6.77	6.11	hike	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Baty Butte Trail #545	4.40	2.14	hike	Northwestern/Coastal Oregon RMP	None	Baty Butte Trail ERMA	onX Backcountry			
Bear Woods Loop Trail	1.30	1.01	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Beaver Dam	0.02	0.02	hike	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry			
Blachly Mountain Forest Loop	6.28	2.77	mtb	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry			
BLM Road 27	2.21	2.21	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
BLM Road 34	1.01	1.01	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
BLM Road 35	1.33	1.33	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
BLM Road 36	1.95	1.68	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
Bloody Stump	0.69	0.57	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry			
Bobblehead	0.75	0.01	mtb	Northwestern/Coastal Oregon RMP	None	Shelburn Trail System	onX Backcountry			
Bobcat Trail	0.35	0.35	hike	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Boulder Ridge Trail #783A	4.02	1.69	hike	Northwestern/Coastal Oregon RMP	Sandy River	Wildwood Recreation Site SRMA	onX Backcountry			
Brad's Bad Gravity	0.29	0.29	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry			
C2C Trail: Phase 1	28.01	0.25	hike	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry			
Campground Edge Trail	0.33	0.33	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry			
Can't Be Done	0.29	0.27	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry			
Catamount Trail	4.09	0.29	hike	Northwestern/Coastal Oregon RMP	None	Silver Falls State Park SRMA	onX Backcountry			
Catamount Trail Loop	10.67	0.90	mtb	Northwestern/Coastal Oregon RMP	None	Shelburn Trail System, Silver Falls State Park SRMA	onX Backcountry			
Cattail Marsh	0.05	0.05	hike	Northwestern/Coastal Oregon RMP	Sandy River	Wildwood Recreation Site SRMA	onX Backcountry			
Chicken Rock Spur	0.06	0.06	hike	Northwestern/Coastal Oregon RMP	None	Table Rock Wilderness-Peachuck Lookout ERMA	onX Backcountry			
Clifford's Crossing	0.38	0.37	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Communication Breakdown	1.21	1.21	mtb	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry			
Connector	0.10	0.10	hike	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry			
Cooper Creek Reservoir Trail	5.45	0.02	hike	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry			
Crown Zellerbach Trail	21.65	1.88	mtb	Northwestern/Coastal Oregon RMP	None	Crown Zellerbach Trail (CZ Mainline) ERMA	onX Backcountry			
D Spur	0.10	0.10	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry			
Danny Boy	1.70	1.70	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry			
Deer Skull Trail	0.49	0.49	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Eagle Creek Trail #501	6.92	0.46	hike	Northwestern/Coastal Oregon RMP	None	Eagle Creek Trail ERMA	onX Backcountry			
Eagles Rest Trail #3461	2.58	0.33	mtb	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	None	onX Backcountry			
Eagles Rest Trail and Goodman Cre	14.42	1.00	mtb	Northwestern/Coastal Oregon RMP	Willamette Valley Prairie Oak and Pine Area	None	onX Backcountry			
Egress	0.30	0.30	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry			
Emerald Trail	0.83	0.83	mtb	Northwestern/Coastal Oregon RMP	None	Swiftwater Day Use Area SRMA, North Umpqua Wild Scenic River Corridor SRMA	onX Backcountry			
Fall Creek Road	3.57	3.57	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
Fern Creek Trail	1.46	1.46	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Floras Beach Access Trail	0.32	0.28	hike	Northwestern/Coastal Oregon RMP	New River	Floras Lake ERMA	onX Backcountry			
Floras Lake Beach	2.81	0.30	hike	Northwestern/Coastal Oregon RMP	New River	Floras Lake ERMA	onX Backcountry			
Flow Motion	0.69	0.69	mtb	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry			
Follow the Leader	1.54	1.54	mtb	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry			
Fl. Hoskins to Vaisetz Gravel Ride	17.85	0.61	mtb	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry			
Fun Girl	0.47	0.47	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry			
Geezer	0.95	0.95	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Ghost Forest	0.03	0.03	hike	Northwestern/Coastal Oregon RMP	Sandy River	Wildwood Recreation Site SRMA	onX Backcountry			
Group Camp 2 Access	0.35	0.35	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry			
Hardy Creek Trail	0.32	0.32	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Heart's Content	0.78	0.78	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry			
Hide and Seek	3.57	2.56	mtb	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry			
Hit Parade	0.32	0.32	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry			
Hit Parade Climb	0.31	0.31	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry			
Homestead Loop	0.50	0.50	hike	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trailhead SRMA	onX Backcountry			
Honey Grove Trail	6.58	6.55	mtb	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry			
Huckleberry Trail	4.34	4.34	hike	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
J Trail	0.14	0.08	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry			
Jigiyat	1.88	1.88	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry			
Lactic Acid	0.32	0.32	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry			
Ladee 802	2.41	0.08	hike	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry			
Laura's Line	0.25	0.25	mtb	Northwestern/Coastal Oregon RMP	Mary's Peak	Sandy Ridge Trail System SRMA	onX Backcountry			
Leapfrog Loop	0.81	0.81	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Letz Peek	0.37	0.37	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry			
Logging Road North	0.14	0.14	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry			
Lookout Mountain Road	4.13	0.60	mtb	Northwestern/Coastal Oregon RMP	None	Shelburn Trail System, Silver Falls State Park SRMA	onX Backcountry			
Looney's Trail	1.26	0.79	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Lost Creek Trail	2.48	1.17	hike	Northwestern/Coastal Oregon RMP	None	Shelburn Trail System	onX Backcountry			
Lost Creek Trail #3462	2.84	0.74	mtb	Northwestern/Coastal Oregon RMP	None	Lost Creek Trails ERMA	onX Backcountry			
Lower Dutchman	0.33	0.33	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
Lower High Baller	0.63	0.63	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
Lower High Baller Access Road	0.61	0.61	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
Lower Whistle Punk	0.36	0.36	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry			
Mama Tried	0.29	0.29	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry			
Mark's Trail	0.46	0.46	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
Mark's Trail	0.46	0.46	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
McBeth Loop	0.60	0.60	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			
McIntyre Ridge Trail #782	6.33	2.78	hike	Northwestern/Coastal Oregon RMP	Sandy River	Wildcat Creek Trail System SRMA	onX Backcountry			
Middle Tie	0.45	0.45	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry			
Miller's Madness	1.45	1.45	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry			
Molalla Rim Loop	7.53	6.75	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry			

Moto Alley	0.39	0.28	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry
Mount June Trail	1.03	0.28	mtb	Northwestern/Coastal Oregon RMP	None	Lost Creek Trails ERMA	onX Backcountry
Mount June Trail #1400	1.03	0.28	hike	Northwestern/Coastal Oregon RMP	None	Lost Creek Trails ERMA	onX Backcountry
Mud Bog Alley	0.47	0.47	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry
Multi-use Trail	1.34	1.09	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry
NCCC	1.21	1.11	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry
North Umpqua Trail #1414	44.55	3.71	hike	Northwestern/Coastal Oregon RMP	None	Swiftwater Day Use Area SRMA, North Umpqua Wild Scenic River Corridor SRMA	onX Backcountry
North Umpqua Trail: Swiftwater Segm	7.13	6.17	mtb	Northwestern/Coastal Oregon RMP	None	Swiftwater Day Use Area SRMA, North Umpqua Wild Scenic River Corridor SRMA	onX Backcountry
North Umpqua Trail: Tigga Segment	6.68	2.58	mtb	Northwestern/Coastal Oregon RMP	None	Swiftwater Day Use Area SRMA	onX Backcountry
Northridge	0.55	0.52	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry
Ode to Joy	0.67	0.67	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry
Ode To Joy - Silver Bullet	1.20	1.20	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry
Oxbow Highlights	5.25	2.27	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry
Pacific City Pathways Trail	1.13	1.13	hike	Northwestern/Coastal Oregon RMP	None	Pacific City ERMA	onX Backcountry
Park HQ to Ancient Forest	1.63	0.55	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry
Picnic Spur	0.05	0.05	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry
Quad Pro Flow	1.55	1.55	mtb	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry
Red Vole Trail	0.60	0.60	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry
Rim Tie Trail	0.97	0.97	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry
Rim Trail	2.90	2.26	hike	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry
River Access Spur	0.05	0.05	hike	Northwestern/Coastal Oregon RMP	Sandy River	Oxbow Regional Park SRMA	onX Backcountry
Rock Drop	0.61	0.61	mtb	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry
Rock Drop Return	0.22	0.22	mtb	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry
Root Wad (aka Toilet Bowl)	0.18	0.05	mtb	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry
Row River Trail	16.06	9.16	mtb	Northwestern/Coastal Oregon RMP	None	Row River Trail ERMA	onX Backcountry
Runway to Floras Lake	2.70	0.04	mtb	Northwestern/Coastal Oregon RMP	New River	Floras Lake ERMA	onX Backcountry
Saddle Trail	1.42	1.42	hike	Northwestern/Coastal Oregon RMP	None	Table Rock Wilderness-Pechuck Lookout ERMA	onX Backcountry
Sandquists Trail	0.28	0.28	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry
Sandy Ridge Full Tour	14.99	12.63	mtb	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry
Sawtooth #1403	2.25	0.13	mtb	Northwestern/Coastal Oregon RMP	None	Lost Creek Trails ERMA	onX Backcountry
Sawtooth Trail #3643 (1403)	2.31	0.13	hike	Northwestern/Coastal Oregon RMP	None	Lost Creek Trails ERMA	onX Backcountry
Shellburg Creek Trail	1.25	0.00	mtb	Northwestern/Coastal Oregon RMP	None	None	onX Backcountry
Silver Bullet	0.47	0.47	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry
Skidmark	0.68	0.68	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry
Slugfest	0.70	0.70	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry
Springboard Trail	2.21	2.21	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry
Squirrel Creek Trail	0.61	0.61	mtb	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	onX Backcountry
Steaming Donkey	0.36	0.36	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry
Steinnon Creek	0.65	0.65	mtb	Northwestern/Coastal Oregon RMP	None	Blue Ridge Trail System ERMA	onX Backcountry
Stumps Don't Win	0.37	0.37	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry
Summit Loop Trail	1.05	0.29	hike	Northwestern/Coastal Oregon RMP	Mary's Peak	Mary's Peak ERMA	onX Backcountry
Summit Trail	2.17	2.17	hike	Northwestern/Coastal Oregon RMP	None	Table Rock Wilderness-Pechuck Lookout ERMA	onX Backcountry
Susan Creek Falls Trail	0.69	0.69	hike	Northwestern/Coastal Oregon RMP	None	Swiftwater Day Use Area SRMA	onX Backcountry
Table Rock Hike	3.50	3.28	hike	Northwestern/Coastal Oregon RMP	None	Table Rock Wilderness-Pechuck Lookout ERMA	onX Backcountry
Table Rock Trail	1.33	1.11	hike	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA, Table Rock Wilderness-Pechuck Lookout ERMA	onX Backcountry
Three Thirty Eight	1.73	1.73	mtb	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry
Three Thirty Eight Connector	0.10	0.10	mtb	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry
Tree Prison	0.34	0.34	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry
Two Turntables and a Microwave	1.05	0.67	mtb	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry
Upper Dutchman	0.82	0.82	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry
Upper High Baller	0.57	0.57	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry
Upper Whistle Punk	0.92	0.92	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry
Valley of the Giants Loop Trail	1.02	1.02	hike	Northwestern/Coastal Oregon RMP	Valley of the Giants	None	onX Backcountry
Valley of the Giants Road	6.69	2.46	mtb	Northwestern/Coastal Oregon RMP	Valley of the Giants	None	onX Backcountry
Wetland Stream	0.03	0.03	hike	Northwestern/Coastal Oregon RMP	Sandy River	Sandy Ridge Trail System SRMA	onX Backcountry
Whistle Punk Access Spur	0.10	0.10	mtb	Northwestern/Coastal Oregon RMP	None	Alsea Fall SRMA	onX Backcountry
Wildwood Wetland Trail	0.28	0.28	hike	Northwestern/Coastal Oregon RMP	Sandy River	Wildwood Recreation Site SRMA	onX Backcountry
Wolf Creek Falls Trail	1.12	1.12	hike	Northwestern/Coastal Oregon RMP	None	Wolf Creek Falls Trail SRMA	onX Backcountry
Your Sister's Trail	0.38	0.38	mtb	Northwestern/Coastal Oregon RMP	None	Carpenter Bypass Mountain Bike Trail ERMA	onX Backcountry
Arm Bar	1.12	1.10	mtb	Southwestern Oregon RMP	None	Mountain of the Rogue SRMA	onX Backcountry
Alsahu	2.01	0.07	mtb	Southwestern Oregon RMP	None	Jackson Creek ERMA	onX Backcountry
Alsahu Trail	2.00	0.07	hike	Southwestern Oregon RMP	None	Jackson Creek ERMA	onX Backcountry
Backside Loop	0.36	0.37	hike	Southwestern Oregon RMP	None	Cathedral Hills Trail System SRMA	onX Backcountry
Bear Gulch - Tunnel Ridge Loop	4.72	4.35	mtb	Southwestern Oregon RMP	Sterling Mine Ditch	Sterling Mine Ditch Trail SRMA, Anderson Little Apple ERMA	onX Backcountry
Bear Gulch Trail	1.00	0.95	mtb	Southwestern Oregon RMP	Sterling Mine Ditch	Sterling Mine Ditch Trail SRMA	onX Backcountry
Bolt Mountain (Fish Hatchery Park)	3.29	2.26	mtb	Southwestern Oregon RMP	None	Bolt Mountain Trail ERMA	onX Backcountry
Bolt Mountain Trail	3.15	2.27	hike	Southwestern Oregon RMP	None	Bolt Mountain Trail ERMA	onX Backcountry
Breakdown	1.11	1.09	mtb	Southwestern Oregon RMP	None	Mountain of the Rogue SRMA	onX Backcountry
Britt Woods	4.92	1.79	mtb	Southwestern Oregon RMP	None	Jacksonville Woodlands Trails ERMA	onX Backcountry
Chucks Chips	2.97	0.69	mtb	Southwestern Oregon RMP	None	None	onX Backcountry
Cloverlawn Loop	0.57	0.55	mtb	Southwestern Oregon RMP	None	Cathedral Hills Trail System SRMA	onX Backcountry
Darkside Trail	0.99	0.99	hike	Southwestern Oregon RMP	None	Mountain of the Rogue SRMA	onX Backcountry
Dollar Mountain (B Street Trail)	2.48	0.37	hike	Southwestern Oregon RMP	None	Northwest Hills ERMA	onX Backcountry
East Applegate Ridge Trail (ART)	5.39	5.40	mtb	Southwestern Oregon RMP	None	East Applegate Ridge Trail ERMA	onX Backcountry
Enchanted Forest Trail	1.73	1.71	hike	Southwestern Oregon RMP	None	Enchanted Forest Felton Trails ERMA	onX Backcountry
Felton Memorial Trail	1.53	1.52	hike	Southwestern Oregon RMP	None	Enchanted Forest Felton Trails ERMA	onX Backcountry
Firewheel	1.22	1.19	mtb	Southwestern Oregon RMP	None	Mountain of the Rogue SRMA	onX Backcountry
Grayback Mountain Trail	8.39	6.94	hike	Southwestern Oregon RMP	Grayback Glades	Grayback Mountain Trail	onX Backcountry
Grizzly Peak Loop Trail	4.83	4.85	hike	Southwestern Oregon RMP	None	Grizzly Peak Trail SRMA	onX Backcountry
Grotto Trail Connector	0.77	0.13	hike	Southwestern Oregon RMP	None	Jackson Creek ERMA	onX Backcountry
Grub Gulch Access Road	1.27	1.30	mtb	Southwestern Oregon RMP	None	Sterling Mine Ditch Trail SRMA, Anderson Addition ERMA	onX Backcountry
Grub Gulch Access Trail	1.51	1.47	mtb	Southwestern Oregon RMP	None	Sterling Mine Ditch Trail SRMA	onX Backcountry
Hanging Rock Trail	0.30	0.01	hike	Southwestern Oregon RMP	None	None	onX Backcountry
Hidden Creek Loop Trail	0.47	0.48	mtb	Southwestern Oregon RMP	None	Anderson Addition ERMA, Hidden Creek Trail ERMA	onX Backcountry
Jack-Ash Trail (Phase I)	8.07	7.77	hike	Southwestern Oregon RMP	Dakubetede	Anderson Addition	onX Backcountry
Jacksonville Forest Park	9.99	0.07	mtb	Southwestern Oregon RMP	None	Jackson Creek ERMA	onX Backcountry
Jane Naversen - connects Petard Di	0.24	0.15	mtb	Southwestern Oregon RMP	None	Jacksonville Woodlands Trails ERMA	onX Backcountry
Kerby Peak Trail	3.30	3.24	hike	Southwestern Oregon RMP	Brewer Spruce	Kerby Peak Trail ERMA	onX Backcountry
Layton Mine Ditch Trail (North)	3.33	2.45	hike	Southwestern Oregon RMP	None	Rock Creek Trails ERMA	onX Backcountry
Liz's Trail	1.35	0.08	mtb	Southwestern Oregon RMP	None	Jacksonville Woodlands Trails ERMA	onX Backcountry
London Peak Trail	1.83	1.15	hike	Southwestern Oregon RMP	None	London Peak Trail ERMA	onX Backcountry
Lookout Connector	0.06	0.06	mtb	Southwestern Oregon RMP	None	Mountain of the Rogue SRMA	onX Backcountry
Lower Hogback	0.31	0.31	mtb	Southwestern Oregon RMP	None	Cathedral Hills Trail System SRMA	onX Backcountry

Lower Table Rock	1.82	0.70	hike	Southwestern Oregon RMP	Table Rocks	Table Rocks SRMA	onX Backcountry
Lower Table Rock Trail	0.89	0.63	hike	Southwestern Oregon RMP	Table Rocks	Table Rocks SRMA	onX Backcountry
Lower Table Rock Trail Connector	0.26	0.27	hike	Southwestern Oregon RMP	Table Rocks	Table Rocks SRMA	onX Backcountry
Mountain of the Rogue	6.79	6.69	mtb	Southwestern Oregon RMP	None	Mountain of the Rogue SRMA	onX Backcountry
Mt. Bolivar Trail #1259	1.02	0.49	hike	Southwestern Oregon RMP	None	None	onX Backcountry
Mule Creek Trail #1159	6.63	6.38	hike	Southwestern Oregon RMP	None	Tucker Flat Campground SRMA	onX Backcountry
Outback Loop	3.02	3.03	hike	Southwestern Oregon RMP	None	Cathedral Hills Trail System SRMA	onX Backcountry
Panorama Point	0.32	0.29	mtb	Southwestern Oregon RMP	None	Jacksonville Woodlands Trails ERMA	onX Backcountry
Pay Dirt	1.41	1.41	mtb	Southwestern Oregon RMP	None	Mountain of the Rogue SRMA	onX Backcountry
PCT: Highway 5 to Highway 140 (near)	48.99	15.06	hike	Southwestern Oregon RMP	Old Baldy	PCT 1&2	onX Backcountry
Petard Ditch	1.40	1.16	mtb	Southwestern Oregon RMP	None	Jacksonville Woodlands Trails ERMA	onX Backcountry
Rat Pack	2.40	2.35	mtb	Southwestern Oregon RMP	None	Mountain of the Rogue SRMA	onX Backcountry
RAT Pack Trail	2.52	2.47	hike	Southwestern Oregon RMP	None	Mountain of the Rogue SRMA	onX Backcountry
Rich Gulch	0.88	0.19	mtb	Southwestern Oregon RMP	None	Jacksonville Woodlands Trails ERMA	onX Backcountry
Rogue River National Recreation Trail	36.52	21.26	hike	Southwestern Oregon RMP	None	Rogue Wild and Scenic River SRMA	onX Backcountry
Sasquatch Trail	1.84	1.79	hike	Southwestern Oregon RMP	None	Mountain of the Rogue SRMA	onX Backcountry
Shade Creek Trail	0.92	0.01	hike	Southwestern Oregon RMP	None	Jackson Creek ERMA	onX Backcountry
Shan Creek Trail #1145	2.00	0.49	hike	Southwestern Oregon RMP	None	None	onX Backcountry
Silver Peak - Hobson Horn Trail #1146	17.06	0.91	hike	Southwestern Oregon RMP	None	None	onX Backcountry
Siskiyou Trail	1.59	0.10	hike	Southwestern Oregon RMP	None	Jackson Creek ERMA	onX Backcountry
Skycrest Loop Trail	0.97	0.96	hike	Southwestern Oregon RMP	None	Cathedral Hills Trail System SRMA	onX Backcountry
Sterling Mine Ditch Trail	20.33	18.94	mtb	Southwestern Oregon RMP	Dakubetede	Sterling Mine Ditch Trail SRMA	onX Backcountry
Sterling Mine Ditch Trail Out-and-Back	16.97	15.73	mtb	Southwestern Oregon RMP	Dakubetede	None	onX Backcountry
Stringer Gap Trail	2.04	0.06	mtb	Southwestern Oregon RMP	None	Bolt Mountain Trail ERMA	onX Backcountry
Sugar Pine	0.30	0.30	mtb	Southwestern Oregon RMP	None	Jacksonville Woodlands Trails ERMA	onX Backcountry
The Grotto Trail	0.68	0.13	hike	Southwestern Oregon RMP	None	Jackson Creek ERMA	onX Backcountry
Timber Riders	1.22	1.12	mtb	Southwestern Oregon RMP	None	Cathedral Hills Trail System SRMA	onX Backcountry
Tunnel Ridge Trail	0.95	0.86	mtb	Southwestern Oregon RMP	Sterling Mine Ditch	Sterling Mine Ditch Trail SRMA	onX Backcountry
Upper Table Rock Trail	1.53	1.52	hike	Southwestern Oregon RMP	Table Rocks	Table Rocks SRMA	onX Backcountry
W Trail	0.81	0.39	hike	Southwestern Oregon RMP	None	Cathedral Hills Trail System SRMA	onX Backcountry
Wagner Creek Loops (including Church)	27.52	1.81	mtb	Southwestern Oregon RMP	None	None	onX Backcountry
Wild Rogue Wilderness Loop	13.04	7.87	hike	Southwestern Oregon RMP	None	Tucker Flat Campground SRMA	onX Backcountry
Wild Rose Loop	0.78	0.55	mtb	Southwestern Oregon RMP	None	Cathedral Hills Trail System SRMA	onX Backcountry
Wolf Gap Access Trail	1.48	1.47	hike	Southwestern Oregon RMP	Sterling Mine Ditch	Sterling Mine Ditch Trail SRMA	onX Backcountry

River Name	River Section	River Length (miles)	Portion Overlapping BLM Land (miles)	Resource Management Plan	ACEC	Recreation Management Area(s)	Data Source	Total River Miles	Total Portion Overlapping with BLM	Portion %
Abiqua Creek	1. Crooked FINDER Spur Road to Abiqua Falls	4.70	1.28	Northwestern/Coastal Oregon RMP	None	None	American Whitewater	946	150	15.83
Alsea	Mill Creek Park to Tidewater	31.77	1.13	Northwestern/Coastal Oregon RMP	None	Missouri Bend SRMA	American Whitewater			
Alsea, N. Fork	1. Three Miles below Kicklatat Lake to North Fork Bridge	4.66	0.46	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Alsea, S. Fork	Hubert McBees Memorial Park to Rock Quarry Weir	6.90	2.44	Northwestern/Coastal Oregon RMP	None	South Fork Alsea Backcountry Byway ERMA	American Whitewater			
Boulder Creek	Bridge Forty Creek to North Fork Siletz	3.70	2.57	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Calapooia	1. National Forest Boundary to end of pavement.	17.13	0.17	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Calapooia	3. McClain Wayss County Park to McKercher Park	29.40	0.18	Northwestern/Coastal Oregon RMP	None	Upper Willamette Valley Margin	American Whitewater			
Canal Creek	1.2 mi above Quartzville Ck	1.30	0.96	Northwestern/Coastal Oregon RMP	None	Quartzville Creek and Yellowstone Trail ERMA	American Whitewater			
Canton Creek	Confluence with Pass Creek to Steamboat Creek	10.70	6.06	Northwestern/Coastal Oregon RMP	None	Scaresman Recreation Site SRMA	American Whitewater			
Canvitt Creek	Lower	5.50	0.61	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Clackamas	3. Three Lynx Power Station to North Fork Reservoir	16.41	1.28	Northwestern/Coastal Oregon RMP	None	South Fork Clackamas Waterfalls ERMA	American Whitewater			
Clackamas	5. River Mill above Willamette River	29.40	0.62	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Clackamas, North Fork	to North Fork Reservoir	3.83	1.39	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Clear Creek	Ore 211 to Redland Road	9.30	0.31	Northwestern/Coastal Oregon RMP	None	Highland ERMA	American Whitewater			
Coquille, East Fork	Brewster Canyon from Sitkum Bridge	0.70	0.58	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Coquille, MF	Mystic Creek to Bear Creek Campground	3.30	0.49	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Coquille, S. Fork	5.2 Miles Above Powers to Baker Creek	8.20	0.11	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Crabtree Creek	1. Snow Peak Camp to Larwood Park	9.80	0.22	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Eagle Creek	2. Fish Hatchery to Eagle Creek Road	10.20	0.30	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Eagle Creek	1. Salmon-Huckleberry Wilderness to Fish Hatchery	4.50	2.33	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Eagle Creek, North Fork	Brian Ranch Road to Eagle Creek	18.00	2.11	Northwestern/Coastal Oregon RMP	None	North Fork Eagle Creek Campground SRMA	American Whitewater			
Elkhorn Creek	to confluence with Little North Santiam	5.98	3.23	Northwestern/Coastal Oregon RMP	None	Elkhorn Creek WSR ERMA	American Whitewater			
Emile Creek	End of "BLM 2 2 Rd" to Little River	1.50	0.88	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Fall Creek	2) Bedrock Campground to Fall Creek Reservoir	7.14	0.41	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Lake Creek Slides	Below Triangle Lake	1.60	0.94	Northwestern/Coastal Oregon RMP	None	Lake Creek Falls	American Whitewater			
Little Luckiamute		3.80	0.27	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Little NF Wilson	Headwaters to Wilson River	10.30	2.32	Northwestern/Coastal Oregon RMP	Little North Fork Wilson River	Tillamook Ridge-Little North Fork Wilson ERMA	American Whitewater			
Little River	2. Lower	17.69	2.26	Northwestern/Coastal Oregon RMP	None	Wolf Creek Falls Trail SRMA, E-Mile Day Use Area SRMA	American Whitewater			
Little Sandy	Bridge on FS 14 to SE Marmot Rd.	11.78	0.26	Northwestern/Coastal Oregon RMP	Sandy River	Sandy-Salmon River Corridor ERMA	American Whitewater			
Luckiamute	Upstream of Oregon 223	5.60	0.60	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
McKenzie	5. Finn Rock to Leadburn Dam	14.79	2.65	Northwestern/Coastal Oregon RMP	None	Low Elevation Headwaters of the McKenzie River	American Whitewater			
Mill Creek	1. Upper Bridge to Mill Creek County Park	6.40	1.85	Northwestern/Coastal Oregon RMP	None	Mill Creek-Gooseneck ERMA, Mill Creek Recreation Site SRMA	American Whitewater			
Mohawk	Mohawk R. Rd to Hileman Rd	7.10	0.16	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Molalla	1) Copper Creek to Table Rock Fork	5.10	3.39	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	American Whitewater			
Molalla	2) Table Rock Fork to Glen Avon Bridge (3 Bears)	13.50	11.81	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA	American Whitewater			
Molalla, Table Rock Fork	Lost Creek to Molalla River	9.10	4.03	Northwestern/Coastal Oregon RMP	None	Table Rock Fork-Molalla River ERMA, Table Rock Wilderness-Peckuck Lookout ERMA	American Whitewater			
Nehalem	4) Salmonberry to Nehalem Falls	7.00	0.01	Northwestern/Coastal Oregon RMP	None	Salmonberry Rail to Trail ERMA	American Whitewater			
Nehalem	3) Spruce Run to Salmonberry River	8.10	0.08	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Nespequa	1. Rocky Bend Camp to Blaine	6.40	0.57	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Quartzville Creek	Above Greesa Creek to Green Peter Reservoir	14.98	6.53	Northwestern/Coastal Oregon RMP	None	Quartzville Creek and Yellowstone Trail ERMA	American Whitewater			
Rickreall Creek	NF Rickreall to Aaron Mercer Reservoir	2.60	0.06	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Rock Creek (Santiam)	East Fork onto Mainstem	3.70	0.17	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Rock Creek (Umpqua)	Above Rock Creek Fish Hatchery	5.60	0.53	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Row	2. Dorena Dam to East Regional Park	4.20	0.19	Northwestern/Coastal Oregon RMP	None	Row River Trail ERMA	American Whitewater			
Row	1. Wildwood Falls to Dorena Reservoir	6.60	0.52	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Sandy	3. Marmot Dam site to Revenue Bridge	6.20	2.19	Northwestern/Coastal Oregon RMP	Sandy River	Sandy-Salmon River Corridor ERMA	American Whitewater			
Sandy	4. Revenue Bridge to Oxbow Park (Columbia River)	12.80	0.52	Northwestern/Coastal Oregon RMP	Sandy River	Sandy-Salmon River Corridor ERMA, Oxbow Regional Park SRMA	American Whitewater			
Sandy	2. Log Pass Road (Zaza) to Marmot Dam site	13.66	0.35	Northwestern/Coastal Oregon RMP	Sandy River	Sandy-Salmon River Corridor ERMA	American Whitewater			
Santiam, Little North	4. Salmon Falls to Elkhorn Park	5.60	0.80	Northwestern/Coastal Oregon RMP	None	Elkhorn Valley Campground SRMA	American Whitewater			
Santiam, Middle	5. Elkhorn Valley Campground to N. Santiam River	11.10	2.53	Northwestern/Coastal Oregon RMP	None	North Fork Santiam County Park SRMA, Canyon Creek SRMA, Elkhorn Valley Campground SRMA	American Whitewater			
Santiam, N.	1. Sheep Creek Rd to Green Peter Reservoir	17.71	0.58	Northwestern/Coastal Oregon RMP	Middle Santiam Terrace	None	American Whitewater			
Santiam, N.	5. McHama to Stayton	10.30	0.27	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Santiam, N.	4. Mill City to McHama	6.60	0.40	Northwestern/Coastal Oregon RMP	None	Fishermen's Bend Recreation Site SRMA	American Whitewater			
Sharps Creek	7 mi above Layng Ck confluence	8.30	2.91	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Siletz, North Fork	North Fork Bridge to Confluence	4.80	0.94	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Siletz, North Fork	Valley of the Giants Fork	2.40	2.27	Northwestern/Coastal Oregon RMP	Valley of the Giants	None	American Whitewater			
Silver Creek	2. Silver Falls State Park to Silver Creek Reservoir	10.20	1.49	Northwestern/Coastal Oregon RMP	None	Silver Falls State Park SRMA	American Whitewater			
Thomas Creek	2. Log Bridge to Hannah Bridge	14.70	0.31	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Thomas Creek	1. Thomas Creek Falls to Log Bridge	3.90	1.87	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Trask	Fish Hatchery to Upper Peninsula Boat Ramp	6.70	0.13	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Trask, N. Fork	North Fork of North Fork Trask River to Trask Park	11.70	2.99	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Umpqua	Confluence of N. and S. Umpqua to Scottsburg	83.90	0.18	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Umpqua, North	2. Soda Springs to Deadline Falls	33.04	4.40	Northwestern/Coastal Oregon RMP	None	Swiftwater Day Use Area SRMA, North Umpqua Wild Scenic River Corridor SRMA	American Whitewater			
Umpqua, North	4. Idleyld Park to confluence with S. Umpqua	33.90	0.50	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Umpqua, North	3. Deadline Falls to Idleyld Park	1.50	1.18	Northwestern/Coastal Oregon RMP	None	Swiftwater Day Use Area SRMA, North Umpqua Wild Scenic River Corridor SRMA, Narrows ERMA	American Whitewater			
Wamicka	Old Road to Boulder Creek	4.20	4.24	Northwestern/Coastal Oregon RMP	Valley of the Giants	None	American Whitewater			
Willamina	Upper Willamina Falls to Lower Willamina Falls	7.70	5.03	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Yaquina River	Green Mountain FS Spur to Loggsden Road	2.10	0.84	Northwestern/Coastal Oregon RMP	None	None	American Whitewater			
Big Butte Creek	Butte Falls to Netherlands Rd	10.70	2.44	Southwestern Oregon RMP	None	None	American Whitewater			
Coquille, MF	Mystic Creek to Bear Creek Campground	3.30	1.01	Southwestern Oregon RMP	None	None	American Whitewater			
Cow Creek	1) Quarry to West Fork	9.70	4.32	Southwestern Oregon RMP	None	None	American Whitewater			
Cow Creek, WF	2) West Fork to Union Creek	5.90	2.13	Southwestern Oregon RMP	None	None	American Whitewater			
Cow Creek, WF		4.70	1.64	Southwestern Oregon RMP	None	None	American Whitewater			
Grave Creek	Six Miles to confluence With Rogue River	7.80	5.85	Southwestern Oregon RMP	None	Rogue Wild and Scenic River SRMA	American Whitewater			
Graves	Eastman Gulch to McCoy Creek Rd (Upper Graves)	3.60	1.47	Southwestern Oregon RMP	None	None	American Whitewater			
Illinois	1 - Highway 199 to Miami Bar (16.4 miles)	16.44	0.81	Southwestern Oregon RMP	Eight Dollar Mountain	Eight Dollar Mountain ERMA	American Whitewater			
Klamath	03. Spring Island to Stataline (Hell's Corner)	16.80	5.97	Southwestern Oregon RMP	None	Upper Klamath River	American Whitewater			
Upper Klamath	Big Bend Run	4.70	4.20	Southwestern Oregon RMP	None	None	American Whitewater			
Rogue	4. Grants Pass to Grave Creek (options up to 33.4 miles)	34.70	3.55	Southwestern Oregon RMP	None	Rogue Wild and Scenic River SRMA	American Whitewater			
Rogue	1. Lost Creek Reservoir to Goff Ray Dam (up to 31.8 miles)	30.90	0.92	Southwestern Oregon RMP	None	None	American Whitewater			
Rogue	5. Grave Creek (Galice) to Foster Bar (Anness) (35 miles)	34.07	1.97	Southwestern Oregon RMP	None	Rogue Wild and Scenic River SRMA	American Whitewater			
Rogue, Middle Fork	Butte Falls Road to Lost Creek Reservoir	6.40	0.39	Southwestern Oregon RMP	None	None	American Whitewater			
Rogue, South Fork	Butte Falls Road to Lost Creek Reservoir	6.80	0.39	Southwestern Oregon RMP	None	None	American Whitewater			
Rough and Ready Creek	Siskiyou National Forest to Hwy 199	4.24	0.97	Southwestern Oregon RMP	None	Rough and Ready	American Whitewater			
Silver Creek, North Fork	Headwaters to Illinois River	22.49	1.05	Southwestern Oregon RMP	None	Silver Creek ERMA	American Whitewater			
Taylor Creek	Taylor Creek Trailhead to Galice Rd	3.48	0.35	Southwestern Oregon RMP	None	Buckhorn Mountain ERMA	American Whitewater			
Umpqua, South	5. MP 22 to Days Creek	14.50	1.04	Southwestern Oregon RMP	None	None	American Whitewater			
Umpqua, South	4. Three C Rocks to MP 22	8.17	0.18	Southwestern Oregon RMP	None	None	American Whitewater			
Umpqua, South	7. Lawson Bar to Myrtle Ck	7.70	0.13	Southwestern Oregon RMP	None	None	American Whitewater			



INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

BLM Oregon and Washington / OR930:

1220 SW 3rd Ave, Portland OR 97204.

Re: **Project Number DOI-BLM-ORWA-0000-2026-0001-RMP-EIS**

Project [Website](#)
Comment [Portal](#)

Dear Kimberly Prill, BLM Oregon and Washington State Director (Acting),

The International Mountain Bicycling Association (IMBA) appreciates the opportunity to provide comments during the ***Notice of Intent To Revise Resource Management Plans for Northwestern and Coastal Oregon and Southwestern Oregon in Oregon/Washington and Prepare an Associated Environmental Impact Statement.***

IMBA is a 501c3 nonprofit that creates, enhances and protects great places to ride mountain bikes. IMBA is focused on creating trails close to home to grow the quantity and quality of mountain bike trail communities, so everyone has access to recreation and iconic backcountry experiences. IMBA works with communities, land managers, and local trail organizations to ensure sustainable trail systems that benefit riders and all trail users. Since 1988, IMBA has been partnering with communities worldwide on trail advocacy, education, stewardship and sustainable trail solutions.

The BLM is the largest land management agency in the U.S., managing 1/10th of America's land base (or some 245 million acres) and the BLM is host to hundreds of miles of [some of the best mountain biking trails in the world](#) including those in [Oregon](#), and numerous other western states. The BLM is also host to a large and growing number of [eMTB trails](#) which is providing continued and new outdoor recreation opportunities for millions of Americans. E-bikes are getting people out of sedentary automobiles and onto bicycles, allowing them much-needed physical activity to experience the natural wonders of public lands around the country.

Key Recommendations

- Analyze recreation as a co-equal multiple use alongside timber production
- Incorporate current recreation data, including updated visitation and trail inventories
- Evaluate indirect and cumulative impacts to adjacent lands and regional recreation systems
- Quantify and compare recreation-related economic contributions with timber outputs
- Include programmatic design features to protect trail infrastructure during timber harvest

Need for Updated Recreation Analysis

The Planning Criteria indicate that the EIS will rely substantially on analyses from the 2008 and 2016 RMPs. While appropriate for some resources, this approach may not adequately reflect current recreation conditions.

Outdoor recreation participation in Oregon has grown significantly over the past decade, particularly in trail-based activities such as mountain biking and trail running. Many communities have invested heavily in trail systems as drivers of tourism and economic development. Reliance on older datasets risks underrepresenting current use levels, infrastructure investments, and economic contributions.

The EIS should incorporate updated recreation data, including:

- Post-2020 participation and visitation trends
- Current trail inventories and GIS datasets
- Recent economic analyses of recreation activity

For reference, [MTBProject.com](https://www.mtbproject.com) is a crowd sourced and professionally vetted trail mapping resource. Trail pages include a “Land Manager” field. Many Oregon trails list “BLM” as the manager, for example:

Sandy Ridge Trail System (within the RMP planning area)

- Clackamas County, near Mount Hood / Brightwood
- BLM Unit: Northwest Oregon District – Cascades Field Office

Sandy Ridge is one of the most significant BLM mountain bike trail systems in the United States. It is frequently cited as a model for federal land mountain bike trail development. The Sandy Ridge trails include about 15+ miles of purpose-built mountain bike trails developed through a **BLM / IMBA partnership**. These trails receive more than 100,000 visits per year and are widely considered a flagship BLM recreation site in the U.S.

Other MTB Trail Networks Located in Western Oregon (within the RMP planning area)

Aalsea Falls

- County: Benton / Lane
- BLM Unit: Northwest Oregon District – Marys Peak Field Office

Mountain of the Rogue

- County: Jackson
- BLM Unit: Medford District

Taylor Creek

- County: Jackson (Ashland area)
- BLM Unit: Medford District

Table Rocks area trails

- County: Jackson
- BLM Unit: Medford District

Rat Pack Trail

- County: Josephine (Near Grants Pass)
- BLM Unit: Medford District – Grants Pass Field Office

These are just examples of many trails in major BLM systems. A broader review of trail inventories on MTBProject indicates that more than 150 individual mountain bike trails in Oregon occur on lands managed by the Bureau of Land Management, demonstrating the agency's critical role in supporting trail-based recreation across the state.

IMBA has worked closely with the BLM for over 20 years. The BLM have been champions of mountain bike access in rural communities throughout the west, which can transform the economies of towns for the better. For example, together the BLM and IMBA are "[Connecting with Communities](#)" through a national partnership, and IMBA helped the BLM develop the [Guide to Quality Trail Opportunities \(GQTE\)](#) used by managers for trail development across the country. From a relationship and mission perspective, the BLM is a highly important land management agency for mountain bikers to support and engage with.

Commenting on this RMP Revision is no exception. We hope the BLM will accept these comments in the constructive spirit they are intended.

The RMP Revision creates over-reliance on previous analysis

Because the BLM plans to fast-track this RMP Revision, the EIS will rely heavily on making analytical assumptions based on interpretations of analyses from the 2016 RMP/EIS and the 2008 RMP/EIS rather than conducting entirely new studies.

Based on our review of the Planning Criteria, impacts to recreation will likely be evaluated within the context of timber management rather than as a competing land use priority on their own.

The term "recreation" does not exist at all in the entirety of the Planning Criteria document. This is concerning as it means it is at best an afterthought.

The implications for recreation are that recreation impacts will likely rely on outdated assumptions about use levels and trail infrastructure from 10-16 years prior. The re-analysis will likely not reflect the rapid growth of outdoor recreation (mountain biking, trail running, etc.) over the past 10-16 years since these previous RMPs were crafted.

While this may be adequate for some resources and data that have not seen drastic changes, this will likely be inadequate as it pertains to the changes that recreation has undergone in the last 10-16 years. Participation in trail-based recreation, including mountain biking, has grown significantly in the Pacific Northwest over the past decade, with many communities across Oregon investing heavily in mountain bike trail systems as drivers of recreation-based tourism and local economic development.

IMBA requests the BLM take this opportunity to better reflect this growth with updated recreation data, updated trail inventories and collecting current recreation economic data to inform the EIS analysis.

Indirect and Cumulative Impacts to adjacent and non-BLM lands

The planning criteria state that the EIS will assume that other ownerships within the planning area will continue current management trends rather than evaluating site-specific future actions. However, under the National Environmental Policy Act (NEPA), the BLM is required to analyze indirect and cumulative effects, including the downstream and adjacent impacts of federal actions on other lands and ownerships (40 CFR §§1508.1(g) and 1508.1(h)).

Timber harvest and associated road construction on BLM lands can influence and degrade conditions on neighboring federal, state, tribal, and private lands through effects such as sediment transport and significant visual resource impacts which can lead to recreation displacement and degradation of trail-based recreation experiences, including mountain biking and other non-motorized trail uses. This could cause irreparable damage to economic drivers of nearby communities if increased or renewed timber production does not consider these factors. Therefore, the EIS should evaluate how management actions proposed under the RMP revision may affect adjacent ownerships and regional landscapes, rather than assuming static conditions outside BLM jurisdiction, in order to fully analyze cumulative and indirect impacts as required under NEPA.

Economic Importance of Outdoor Recreation in Oregon

Public trail systems, such as those provided by BLM field offices, have a direct correlation with public health and economic prosperity. Even in 2023 articles like [“It pays for small towns to invest in trail systems”](#) on UtahBusiness.com speak to this value. This article delves into the value of accessible lands and how human health and wealth is connected to public access to trails. Trails bring value to public lands and the communities they serve. The economic value this generates translates directly to community wealth.

The NOI frames economic impacts almost entirely through timber jobs and county payments. FLPMA requires multiple-use, not timber dominance. The EIS should quantify the economic impacts of recreation and then compare projected timber revenue with actual recreation revenue and employment data.

Since the last RMP was completed, outdoor recreation represents a major and growing sector of Oregon’s economy and should be considered alongside timber production when evaluating management direction for BLM lands in Oregon.

Economic analyses conducted by state agencies and outdoor recreation economic studies demonstrate that outdoor recreation generates significant economic activity, employment, and tax revenue throughout western Oregon. For example:

- Outdoor recreation in Oregon supported approximately \$16 billion in annual consumer spending in 2022.

- That spending supported approximately 192,000 full- and part-time jobs statewide, generating about \$8.2 billion in wages and compensation.
- Visitor recreation alone accounted for \$3.4 billion in trip-related spending, supporting roughly 37,000 jobs.
- Federal economic accounting also shows that outdoor recreation contributes more than \$8 billion annually to Oregon's gross state product, representing a significant share of the state economy.

Mountain biking in particular has become an important component of recreation-based tourism in many Oregon communities, with purpose-built trail systems attracting regional and national visitors and supporting local businesses such as bike shops, lodging, guiding services, and restaurants.

National analyses by groups such as the Outdoor Industry Association, Headwaters Economics, and Outdoor Recreation Roundtable similarly demonstrate that outdoor recreation has become a major economic sector across the United States, supporting millions of jobs and contributing substantially to national and state GDP.

In Oregon, many of the economic benefits generated by outdoor recreation are directly linked to access to public lands and rivers and trail systems located on federal lands, including lands administered by BLM. Activities such as mountain biking, hiking, trail running, and dispersed recreation depend heavily on access to intact trail networks and recreation infrastructure.

Because the RMP revision is intended to increase sustained yield timber harvest on BLM lands, timber management direction must be designed in a way that maintains the recreation infrastructure that supports this significant sector of Oregon's economy. Trail systems represent long-term public investments that support tourism, local businesses, and rural economies throughout western Oregon.

Many trail systems on BLM lands have been constructed and maintained through partnerships between land managers, local trail organizations, and volunteers. These partnerships represent substantial public investment in recreation infrastructure through volunteer stewardship, trail construction, and long-term maintenance. Protecting trail infrastructure during timber harvest and vegetation treatments helps preserve these investments and supports continued collaboration between BLM and the recreation community.

Accordingly, ensuring that timber harvest and vegetation management activities avoid unnecessary damage to trail infrastructure will help maintain the economic benefits associated with outdoor recreation while still allowing BLM to achieve timber production objectives.

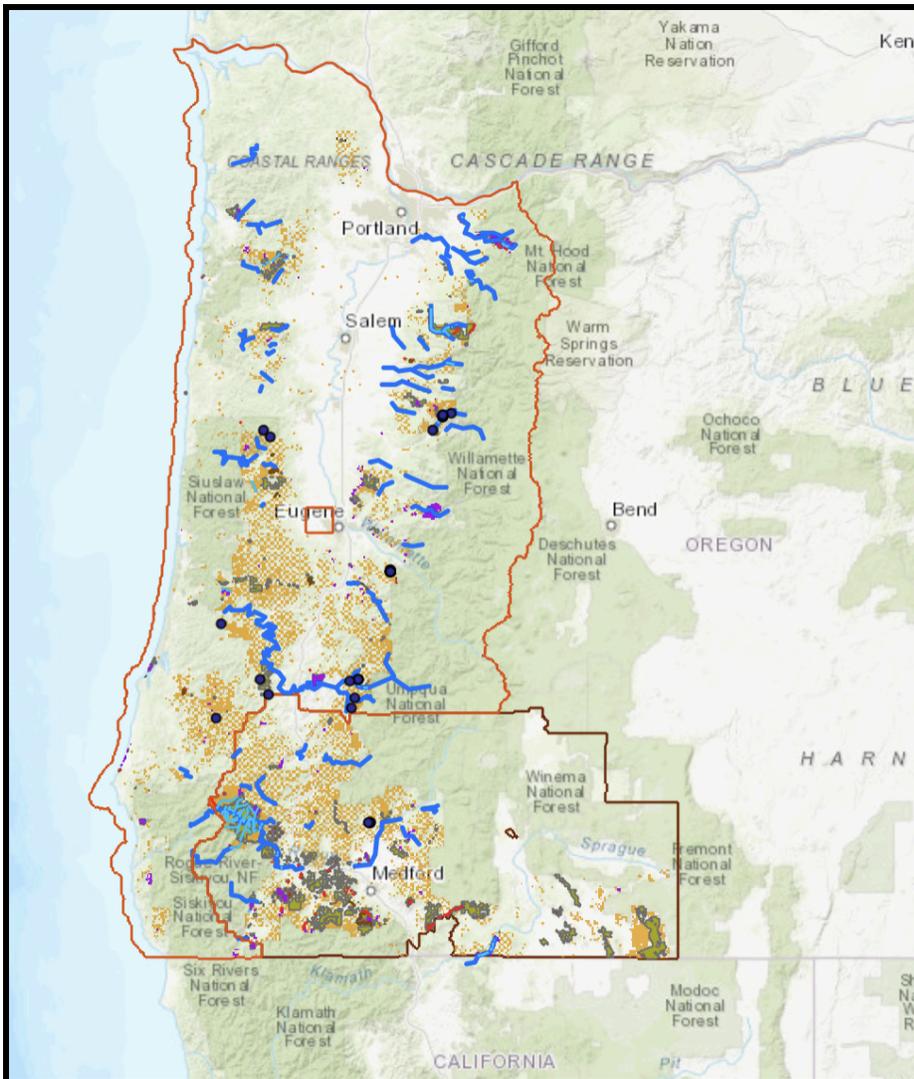
Integrating Recreation Infrastructure Protection into Timber Harvest and Vegetation Management Direction

The Bureau of Land Management should incorporate programmatic design features to protect recreation infrastructure during timber harvest and vegetation management activities analyzed in the ***Notice of Intent To Revise Resource Management Plans for Northwestern and Coastal Oregon and Southwestern Oregon in Oregon/Washington and Prepare an Associated Environmental Impact Statement.***

The NOI explains that the purpose of the RMP revision is to evaluate management direction that could increase sustained yield timber harvest on BLM-administered lands in western Oregon. Because increased timber harvest will require expanded vegetation management activities (including mechanical treatments, thinning, and associated operations), it is important that the RMP framework ensure that these activities are implemented in a manner compatible with other multiple-use values on BLM lands. One of those values is recreation assets such as

mountain bike trails, hiking trails, climbing sites, and other trail-based recreation infrastructure that support a wide range of public land uses.

BLM lands within the planning area contain multiple trail networks and recreation infrastructure, including areas managed as **Special Recreation Management Areas (SRMAs)** and **Extensive Recreation Management Areas (ERMAs)**. Some of these areas contain purpose-built mountain bike trail systems and shared-use trails that have been developed over time through partnerships between



local trail organizations, land managers, and volunteer stewardship programs. In addition, it is our understanding that some **Areas of Critical Environmental Concern (ACECs)** established

in the current RMP were designated in part to recognize and protect recreation resources and trail systems.

At this planning stage, the specific locations of future timber harvest and vegetation management activities have not yet been identified. Because these implementation-level treatment locations are unknown, it is currently not possible to determine where potential conflicts between timber harvest activities and recreation infrastructure may occur. We therefore cannot provide specific comments on how this NOI impacts specific landscapes and recreation areas.

However, the presence of recreation assets on BLM lands within the planning area is well documented. IMBA, Outdoor Alliance, local mountain bike organizations, and other recreation groups maintain GIS datasets and interactive mapping tools identifying trails, trailheads, and related recreation infrastructure across BLM lands in western Oregon, including mountain bike trail networks that have been constructed or maintained through partnerships with land managers. These datasets demonstrate that trail networks occur throughout the planning area, including in landscapes that may also contain timber resources.

Because the spatial relationship between future timber harvest areas and recreation assets is uncertain at the RMP stage, the revised RMP should incorporate programmatic design features ensuring that timber harvest and vegetation management activities avoid unnecessary damage to trail systems and recreation infrastructure when projects are implemented.

Precedent for Recreation-Sensitive Vegetation Treatments

BLM has incorporated recreation-protective design features into vegetation management projects in other field offices.

For example, the **BLM Cedar City Field Office's 2024 Shurtz Canyon Hazardous Fuels Reduction Project Environmental Assessment** incorporated project design elements intended to avoid and minimize impacts to trail systems during vegetation treatments. These measures included avoiding equipment use on trails, preventing slash from blocking trail corridors, coordinating with recreation staff, and restoring any disturbed trail tread following project implementation.

Although the Shurtz Canyon project focused on fuels reduction, the operational activities involved, mechanical vegetation treatments, tree removal, and slash management, are similar to those that occur during timber harvest and associated vegetation management activities.

Accordingly, similar design principles should be incorporated into the Oregon RMP revision EIS to ensure that increased timber harvest can occur without unnecessarily degrading recreation infrastructure.

Recommended Programmatic Design Features for Timber Harvest Activities

While the BLM proposes to exclude certain lands from sustained-yield timber harvest which could protect some recreational assets that fall within those excluded designations, trails and other recreation assets that fall outside these areas remain vulnerable to harvest impacts. To ensure compatibility between timber management and recreation, the RMP should include the following programmatic design features:

1. Avoid Operating Equipment on Designated Trails – Logging equipment and mechanical treatment equipment should avoid operating on designated trails or within trail tread unless specifically authorized for trail maintenance or restoration purposes.
2. Protect Trail Tread and Constructed Trail Features – Timber harvest operations should protect trail tread, drainage structures, retaining features, bridges, berms, and other constructed trail improvements commonly found on purpose-built mountain bike trails. Any disturbance should be repaired following project completion.
3. Prevent Logging Debris from Blocking Trails – Slash, cut timber, and other logging debris should not be piled or deposited on designated trails or within trail corridors.
4. Maintain Trail Access During Timber Operations – Timber harvest projects should be designed to maintain trail access wherever feasible. Where temporary closures are required for safety, closures should be limited in duration and coordinated with recreation managers.
5. Incorporate Recreation Data in Project Planning – Implementation-level timber harvest projects should incorporate available GIS datasets identifying trails and recreation infrastructure and should involve coordination with BLM recreation specialists during project planning.
6. Use Low-Impact Methods Near Trails Where Feasible – Where harvest units occur adjacent to trails, project design should consider treatment methods that minimize soil disturbance and trail damage.
7. Restore Trails Following Harvest Activities – If timber harvest operations disturb trail surfaces or structures, those features should be restored to pre-project conditions or better following project completion.

Need for Programmatic Direction Due to Spatial Uncertainty

Because the RMP revision will establish landscape-scale management direction without identifying specific harvest locations, incorporating these design features at the programmatic level would provide important guidance for future implementation-level timber harvest projects.

Including these measures in the RMP would help ensure that future increases in timber harvest can occur while maintaining the recreational values of BLM lands and avoiding unnecessary impacts to trail infrastructure.

Legal and Policy Basis

Incorporating recreation-protective design features into timber harvest direction is consistent with several statutory and regulatory requirements.

Multiple-Use Management (FLPMA).

Under the Federal Land Policy and Management Act, BLM must manage public lands for multiple uses, including outdoor recreation and timber production. Ensuring that timber harvest operations avoid unnecessary damage to recreation infrastructure supports balanced multiple-use management.

BLM Travel Management Rule.

BLM's travel management regulations require the agency to manage designated routes and trails in a manner that protects resources and recreational opportunities. Protecting trail infrastructure during timber operations supports these responsibilities.

NEPA Impact Analysis Requirements.

Under the NEPA, BLM must analyze impacts to recreation resources and consider reasonable mitigation measures. Programmatic design features provide a practical way to minimize recreation impacts associated with increased timber harvest.

Requested Considerations

The revised Resource Management Plans and associated EIS should:

1. Recognize the presence of extensive trail systems and recreation infrastructure across BLM lands in the planning area, including mountain bike trail networks and shared-use trails both outside of and within SRMAs, ERMAs, and ACECs.
2. Acknowledge that increased timber harvest may occur in areas containing recreation assets.
3. Incorporate programmatic design features, ensuring that timber harvest and vegetation management activities avoid damage to trails and recreation infrastructure.
4. Ensure that implementation-level timber harvest projects incorporate recreation GIS datasets and coordination with recreation specialists during project planning.

IMBA recognizes that forest management activities such as timber harvest and vegetation treatments are an important component of public land management. With appropriate project design and coordination, these activities can be compatible with trail-based recreation. Incorporating recreation-sensitive design features into the RMP would help ensure that timber management objectives can be achieved while maintaining high-quality trail experiences on BLM lands.

We appreciate the opportunity to comment and look forward to continued partnership with BLM to support balanced, multiple-use management of public lands.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Clark', with a long horizontal flourish extending to the right.

Aaron Clark
Government Affairs – Policy Manager
International Mountain Bicycling Association



PO Box 63
Springfield, OR 97477
americanwhitewater.org

A Proposal to Designate the Upper Klamath River Canyon Area of Critical Environmental Concern (ACEC) in Klamath Falls Field Office Planning Area of the Lakeview District, Bureau of Land Management

Submitted by American Whitewater
March 21, 2026

In Response to the February 19, 2026 Notice of Intent to Revise
Resource Management Plans for Western Oregon

1. PROPOSED ACEC OVERVIEW

Name of Proposed ACEC: Upper Klamath River Canyon ACEC

Primary Values: Important natural systems and processes; fish and wildlife resources; scenic values; cultural and tribal resources; distinctive botanical communities; and ecosystem resilience associated with post-dam removal ecological recovery.

General Location: The Klamath River canyon below the former J.C. Boyle Dam site and the existing Upper Klamath River Addition ACEC in Klamath County, Oregon. See Attachment A for a detailed map and geospatial links.

Legal Description: Portions of Sections 1, 11, 12, and 13, Township 40 South, Range 6 East, Willamette Meridian, Oregon

Acres: 351.9

2. SUMMARY OF RESOURCE VALUES AND SIGNIFICANCE

This proposal nominates Bureau of Land Management (BLM) lands along the Upper Klamath River Canyon for designation as an Area of Critical Environmental Concern (ACEC). The proposed ACEC includes nearly 352 acres of BLM-administered lands located along approximately two miles of the Upper Klamath River below the former J.C. Boyle Dam site to the upstream boundary of the existing Upper Klamath River Addition ACEC.

Following the removal of the J.C. Boyle Dam and associated hydropower infrastructure in 2024, this reach of the river has been restored to free-flowing conditions after more than six decades of diversion into the hydropower project that left the river without substantial flows. Because this section of the Upper Klamath River was diverted rather than flooded by the hydropower

project, it retains largely intact canyon landscapes, aquatic and riparian habitats, and scenic and recreational values. With the restoration of natural flows, the river corridor has rapidly reestablished ecological function and now represents one of the most visually striking and ecologically intact canyon landscapes along the Upper Klamath River. Anadromous fish returned to this reach in late 2024 and, as of March 2026, are confirmed to have successfully established breeding populations.

The proposed ACEC contains significant ecological, scenic, and recreational values that are closely connected to those recognized in the Upper Klamath River Addition ACEC, the Upper Klamath River ACEC, and the designated Upper Klamath Wild and Scenic River. These areas collectively form a continuous corridor of outstanding riverine landscapes and natural processes along the Upper Klamath River.

The canyon also supports exceptional recreational values. The restored river reach now provides a high-quality whitewater boating experience that is comparable to the well-known Hells Corner Run immediately downstream. The river corridor and canyon also support angling, wildlife viewing, photography, and other nature-based recreation opportunities.

Designation of the Upper Klamath River Canyon ACEC would recognize and protect these important natural, ecological, scenic, and cultural resources and values while ensuring that management of these public lands maintains the restored natural processes and landscape character that define this portion of the Upper Klamath River. These values merit careful consideration by the BLM for establishment as an ACEC as part of the Southwest Oregon Resource Management Plan revision process now underway.

The Bureau of Land Management is also required, as part of this Resource Management Plan revision, to evaluate river segments for eligibility under the Wild and Scenic Rivers Act. In its 1990 eligibility study, BLM identified multiple outstandingly remarkable values associated with the Upper Klamath River canyon; however, the reach between J.C. Boyle Dam and the J.C. Boyle powerhouse was found ineligible solely due to the absence of a free-flowing condition under hydropower operations. With the removal of J.C. Boyle Dam in 2024 and restoration of continuous flow, free-flowing condition has been fully restored. This reach now warrants reevaluation for Wild and Scenic River eligibility. ACEC designation would provide complementary management for these values within the broader context of river corridor conservation and planning.

3. ACEC POLICY AND REGULATORY FRAMEWORK

Overview of ACEC Designation

An Area of Critical Environmental Concern (hereafter ACEC) is defined as an area within the public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes. On BLM lands, ACEC designation indicates to the public that BLM recognizes that an area has significant values and has established special management measures to protect those values.

When Congress enacted the Federal Land Policy and Management Act of 1976 (FLPMA), it declared that “it is the policy of the United States that . . . regulations and plans for the protection of public land areas of critical environmental concern be **promptly** developed.” 43 U.S.C. 1701(a)(11). FLPMA defines an area of critical environmental concern (ACEC) as “areas within the public lands where special management attention is required . . . **to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes**, or to protect life and safety from natural hazards.” 43 U.S.C. 1702(a); BLM Manual MS-1613, 1.1 (emphasis added). To protect these areas and prevent irreparable damage, the Secretary shall, during the revision of land use plans, “**give priority to the designation and protection of areas of critical environmental concern.**” 43 U.S.C. 1712(c)(3) (emphasis added). It is important for BLM to note here that wildlife resource values are included in this statutory list.

State BLM directors are responsible for (1) ensuring compliance with FLPMA and other relevant law and policy for ACECs and (2) identifying, evaluating, and prioritizing areas that have potential for designation and management as ACECs. BLM Manual MS-1613, 1.4(B).

FLPMA does not treat ACECs and their designation as optional. These provisions in FLPMA establish the clear statutory mandate that BLM must identify, designate, and manage ACECs “to protect a diverse array of unique and important areas and features including fish and wildlife habitats, rare plant populations, archaeological and historic sites, areas of significance to Tribes, and visually unique natural landscape features.” BLM Manual MS-1613, 1.1; see also 1.6 (“FLPMA requires the Secretary to give priority to the designation and protection of ACECs”). ACECs are the only conservation designation that FLPMA explicitly requires BLM to prioritize in land use planning.

FLPMA requires the BLM to manage public lands for multiple use and sustained yield, which includes maintaining the long-term health and productivity of ecosystems that support recreation, grazing, wildlife habitat, cultural values, water resources, and other public benefits. ACECs are a core tool for implementing multiple use because they allow BLM to tailor

management to places where ordinary programmatic direction is insufficient to prevent irreparable damage. BLM has the explicit authority and obligation to adopt management prescriptions sufficient to protect resources that make an area “critical.”

ACECs are one of BLM’s most important tools for managing public lands lawfully and responsibly in a multiple-use system and to protect areas with special natural processes and other ecosystem services.

It is important to note that the Public Lands Rule, formally known as the Conservation & Landscape Health Rule, is still in effect and codifies the BLM’s existing policies for ACEC designation and management. The Public Lands Rule ensures conservation remains a key component of modern public lands management and helps BLM protect our healthiest lands and waters, restore those that need it, and make informed management decisions based on the best available science and data.

U.S. Department of Interior regulations outline the three criteria by which BLM designates ACECs. 43 C.F.R. 1610.7-2(d); BLM MS-1613, 2.1. The area must exhibit *relevance*: it must contain “important historic, cultural, or scenic values; fish or wildlife resources; natural systems or processes; or natural hazards potentially impacting life and safety. 43 C.F.R. 1610.7-2(d)(1). It must exhibit *importance*: the area and its value must have “qualities of special worth, consequence, meaning, distinctiveness, or cause for concern; national or more than local importance, subsistence value, or regional contribution of a resource, value, system or process; or contributes to ecosystem resilience, landscape intactness, or habitat connectivity.” 43 C.F.R. 1610.7-2(d)(2). Last, it must “require special management attention,” meaning management prescriptions that (i) protect and prevent irreparable damage to the relevant and important values, or that protect life and safety from natural hazards; and (ii) would not be prescribed if the relevant and important values were not present. 43 C.F.R. 1610.7-2(d)(3).

Overview of this ACEC Proposal and Supporting Documents

This ACEC nomination summarizes some of the outstanding environmental values and resources of the Upper Klamath River Canyon public lands and how these values satisfy the criteria under which BLM shall designate new ACECs. Also included are sections summarizing additional benefits to recreation as a result of ACEC establishment and management considerations that offer additional context for why designation of this ACEC is particularly warranted and appropriate at this time. Two attachments present a map and photos.

4. ENVIRONMENTAL RESOURCES AND VALUES ASSOCIATED WITH UPPER KLAMATH RIVER CANYON

The proposed Upper Klamath River Canyon ACEC comprises 352 acres of contiguous public lands situated in the uppermost portion of the Klamath River Rim area of the river’s deeply incised canyon. This section outlines the significant ecological values associated with these lands which include:

- Natural Systems and Free-Flowing River Processes,
- Fish and Wildlife Habitat,
- Scenic River and Canyon Landscapes,
- Cultural and Tribal Resources and Significance,
- Botanical Diversity and Distinctive Plant Communities, and
- Ecological Recovery Following Dam Removal.

Natural Systems and Free-Flowing River Processes

The proposed Upper Klamath River Canyon ACEC contains significant natural-system values associated with a restored free-flowing river and its surrounding canyon environment. Following the removal of J.C. Boyle Dam and its associated diversion infrastructure and powerhouse in 2024, this reach of the Upper Klamath River now functions as a continuous, free-flowing system, allowing for the reestablishment of natural hydrologic, geomorphic, and ecological processes.

A defining feature of this reach is the presence of substantial spring inflows within the canyon. The 2023 J.C. Boyle–Copco Thermal Refugia and Habitat Restoration Final Report¹ found that springs in the bypass reach contribute approximately 225 cubic feet per second (cfs) of flow at temperatures near 11°C, exerting a dominant influence on the river’s thermal regime. These inputs stabilize water temperatures year-round, producing relatively cooler conditions in summer and warmer conditions in winter, and significantly increasing total flow in the canyon.

The 2023 thermal study further characterizes this segment as a distinct thermal reach defined by numerous “significant thermal features” (STFs)—discrete groundwater inputs that collectively create a gaining river system. These inputs, totaling hundreds of cubic feet per second, regulate river temperature year-round and result in a thermally stable, process-driven system. Importantly, these features are not isolated occurrences, but form interconnected complexes that define the physical and ecological character of the reach.

¹ PacifiCorp (2023), [Evaluation of Thermal Refugia and Habitat Restoration Opportunities of the Klamath River between J.C. Boyle Dam and Copco Reservoir: Final Report](#), May 17, 2023.

In addition to their contribution to flow and temperature, these spring inputs form discrete and reach-defining thermal features that provide cold-water refugia for native fish species. The thermal study identifies these features as important habitat for redband trout and notes their anticipated importance for anadromous salmonids following dam removal. With the reestablishment of fish passage in the Klamath River, salmon are now present in this canyon reach, and these spring-fed thermal refugia are expected to support juvenile salmonids during warm summer conditions and, over time, may provide critical habitat for species such as spring Chinook as populations re-establish. For the first time since construction of Copco Dam blocked salmon migration in the early 20th century, successful reproduction of wild salmonids was documented in the Klamath River in Oregon in March 2026.²

The influence of springs on this reach has been recognized for decades. The 1994 National Park Service Upper Klamath River Wild and Scenic River Eligibility Report³ similarly found that summer temperature fluctuations were least in the bypass reach due to stable flows and instream springs, with relatively consistent seasonal temperatures compared to downstream segments. Together with recent thermal and flow data, these findings demonstrate that the canyon below J.C. Boyle is a groundwater-influenced, gaining river system in which spring inputs play a central role in shaping water temperature, flow conditions, and aquatic habitat.

Although springs occur elsewhere in the Upper Klamath River, the abundance and volume of springs in the proposed ACEC area are uniquely concentrated and function as a distinct thermal unit within the larger river system. Originating at the upper end of the canyon, these inputs propagate downstream, influencing flow and thermal conditions across an extended length of the river corridor.

The contribution of spring inflows in this reach is also reflected in applied hydrologic and recreation analyses. The Final Whitewater Boating Study⁴ conducted in support of the Klamath dam removal project treats spring accretions as a consistent component of the river's baseflow and incorporates these inputs in defining downstream flow conditions and boating suitability within the proposed ACEC area and downstream reaches within the Upper Klamath River Addition ACEC and the designated Wild and Scenic River reach within the Upper Klamath River Addition ACEC. This study highlights the functional importance and reliability of these spring inputs in sustaining summer baseflows and shaping river conditions not only within the proposed ACEC, but throughout the contiguous Upper Klamath River corridor.

² Hereford, M., Oregon Department of Fish and Wildlife, personal communication, March 19, 2026.

³ National Park Service (1994), [Klamath River Wild and Scenic River Draft Eligibility Report](#), U.S. Department of the Interior

⁴ Confluence Research and Consulting (2021), [Final Whitewater Boating Study: Lower Klamath River Project \(FERC No. 14803\)](#), November 2021. (Also available on the Federal Energy Regulatory Commission P-14803 docket within the *Rec Plan Dec 2022* file at [Accession Number 20221202-5208](#).)

Management of these lands as an ACEC would help conserve natural systems and free-flowing river processes by maintaining upland, groundwater, and spring-influenced hydrologic functions and their associated ecological expressions in this restored canyon reach. Management of the surrounding lands is integral to sustaining the groundwater and spring inputs that shape flow, temperature, and aquatic habitat conditions in the river. This management would also align conservation of these flow-dependent and process-based values with those recognized in the adjacent Upper Klamath River Addition ACEC and Upper Klamath River ACEC.

Fish and Wildlife Habitat

The proposed Upper Klamath River Canyon ACEC supports important fish and wildlife habitat associated with a free-flowing river system in a steep canyon environment. The river corridor, adjacent riparian areas, and surrounding uplands provide habitat for a variety of aquatic and terrestrial species, including native fish, migratory birds, and wildlife adapted to canyon and riverine environments.

Fish and wildlife resources in the Upper Klamath River canyon have long been recognized as significant. The Bureau of Land Management identified fish and wildlife, along with scenic and recreational resources, as outstandingly remarkable values within the Upper Klamath River study area extending from J.C. Boyle Dam downstream through the proposed ACEC area.⁵ These values were identified within the proposed ACEC area and adjacent downriver areas, reflecting the importance of the entirety of the steep canyon river corridor and associated habitats for both aquatic and terrestrial species.

With the re-establishment of volitional fish passage following dam removal, the ecological importance of this reach has increased substantially relative to conditions under hydropower operations. The canyon now functions as a critical cold-water habitat network, shaped by numerous spring-fed inputs that contribute substantially to flow and create thermally distinct refugia within the mainstem, as identified in the 2023 J.C. Boyle–Copco Thermal Refugia and Habitat Restoration Study. These features are particularly important during late summer and early fall, when flows are lowest and water temperatures are highest. During this period, fall-run Chinook salmon migrate upstream to spawn, while spring-run Chinook salmon hold in deep pools and cold-water refugia to over-summer prior to spawning. These habitats also support resident species, including redband trout, and provide important rearing conditions for juvenile salmonids. The availability and connectivity of cold-water refugia are therefore essential to supporting migration, over-summer survival, and year-round habitat function under

⁵ Bureau of Land Management (1990). [Final Eligibility and Suitability Report for the Upper Klamath Wild and Scenic River Study](#). Lakeview District, Klamath Falls Resource Area, Oregon.

elevated thermal stress. Ongoing restoration processes are expected to further enhance these habitat functions over time.

In addition to aquatic habitat, the canyon supports diverse terrestrial and riparian wildlife habitat that is characteristic of the Upper Klamath River corridor. The 1990 BLM eligibility and suitability report identifies the canyon as supporting important wildlife resources, including habitat for big game species and raptors, and emphasizes the role of the river corridor and adjacent uplands in providing habitat diversity and continuity across the landscape. Steep canyon walls and cliff features provide nesting and roosting habitat for raptors, while adjacent benches, slopes, and upland areas support seasonal use by large mammals, including winter range. The restoration of free-flowing conditions in the river and the year-round presence of abundant water benefit terrestrial wildlife through improved habitat and increasing availability of food sources, particularly for species that consume fish and other aquatic flora and fauna.

Riparian areas within the canyon provide particularly important habitat for a wide range of wildlife species, offering water, forage, and cover within an otherwise dry surrounding landscape. The close juxtaposition of riverine, riparian, and upland environments within a relatively narrow and undeveloped canyon creates a high degree of habitat complexity and supports species movement along the river corridor. These conditions are consistent with wildlife habitat values identified in the adjacent Upper Klamath River ACEC and Upper Klamath River Addition ACEC, where protection of riparian systems, wildlife habitat, and ecological connectivity are recognized as relevant and important values in BLM's 2016 Resource Management Plan.

Management of these lands as an ACEC would help conserve fish and wildlife habitat by maintaining the hydrologic, thermal, and ecological processes that support aquatic and terrestrial species in this canyon reach, and would align management of these resources with those recognized in the adjacent ACECs.

Scenic River and Canyon Landscapes

The proposed Upper Klamath River Canyon ACEC contains significant scenic values associated with a deeply incised river canyon and a restored free-flowing river. The canyon is characterized by steep rock walls, prominent geologic features, and a relatively undeveloped landscape that provides a high degree of visual contrast and naturalness. The river corridor, confined within this narrow canyon, creates a visually striking landscape in which flowing water, rock formations, and vegetation are closely integrated.

The scenic values of the Upper Klamath River have long been recognized. The Bureau of Land Management identified scenic resources as outstandingly remarkable values in its 1990 eligibility and suitability evaluation of the Upper Klamath River, reflecting the importance of the canyon landscape and its visual quality.

Following the removal of J.C. Boyle Dam and its associated infrastructure including the canal, powerhouse, and transmission lines, scenic conditions in this reach have been substantially enhanced. The return of continuous flow through the canyon has restored the visual presence and sound of a free-flowing river, reestablishing natural visual processes that were previously diminished by flow diversion for hydropower. While some evidence of past land use remains, the overall scenic integrity of the canyon is high, human presence in many areas is indiscernible, and the landscape is largely defined by natural landforms and river processes.

The proposed ACEC occupies the same canyon system immediately upstream of the Upper Klamath River Addition ACEC and the designated Wild and Scenic River segment and Upper Klamath River ACEC just downstream. Within this broader canyon system, the segment encompassed by the proposed ACEC is among the steepest, most confined, and visually striking portions of the Upper Klamath River canyon. These areas share similar visual characteristics, including steep canyon topography, a confined river corridor, and a strong sense of naturalness and isolation. Together, they form a continuous scenic corridor along the Upper Klamath River that no longer includes the presence and impacts of the hydropower project.

Management of these lands as an ACEC would help conserve scenic values by maintaining the natural visual character of the canyon, limiting surface disturbance and visual intrusions, and ensuring that the restored free-flowing condition of the river remains the dominant visual feature of the landscape. This management would also provide consistency with scenic values recognized in the adjacent ACECs and designated Wild and Scenic River segment and provide for further restoration of natural scenic character in areas previously impacted by hydropower infrastructure.

Cultural and Tribal Resources and Significance

The proposed Upper Klamath River Canyon ACEC contains cultural values associated with the long history of human use and occupation along the Klamath River, as well as ongoing Native American cultural presence and use. The river corridor and surrounding canyon landscape have supported human activity for thousands of years and contain prehistoric and historic resources associated with this use.

The Bureau of Land Management’s 1990 eligibility and suitability report for the Upper Klamath River identified cultural resources, including prehistoric and historic sites, as outstandingly remarkable values within the study area, and recognized Native American traditional use of the river corridor as an important resource value. These findings reflect a longstanding and continuing cultural relationship between Indigenous communities and the Klamath River.

This relationship is not solely historical. The Klamath River remains a contemporary Native American cultural landscape with ongoing spiritual, cultural, and subsistence significance. The removal of the Klamath dams and the reestablishment of volitional fish passage—particularly the return of anadromous fish such as salmon—represent a profound ecological and cultural change. Tribes have been central to achieving this outcome and continue to be actively engaged in restoration, stewardship, and use of the river corridor.

Given these restored conditions, the proposed ACEC area is expected to support increased Native American use and cultural engagement over time. These values are closely tied to the natural systems of the river and canyon, including water, fish and wildlife resources, and the unique environmental conditions created by the canyon landscape.

Management of these lands as an ACEC would help ensure that cultural resources and values are appropriately recognized and conserved, including through government-to-government consultation and ongoing coordination with Tribes. This designation would provide an opportunity to support continued cultural use, protect sensitive resources, and align management with the recognition of cultural values in the adjacent Upper Klamath River ACEC, Upper Klamath River Addition ACEC, and designated Wild and Scenic River segment.

This section is intended to identify the presence of Native American cultural values and the need for their protection and further engagement, rather than to define those values, which can only be informed through direct consultation with Tribes and Indigenous communities.

Botanical Diversity and Distinctive Plant Communities

The proposed Upper Klamath River Canyon ACEC contains substantial botanical value as part of the broader Klamath River canyon landscape, which BLM has recognized for its distinctive and diverse plant communities. Like the adjacent Upper Klamath River ACEC and Upper Klamath River Addition ACEC, the area supports unique plant assemblages that “bisect the Cascade Mountains,” reflecting a transition between montane and high desert ecological systems. This transitional setting, combined with steep canyon topography, riverine influence, and numerous springs, creates a mosaic of montane conifer forest, high desert, riparian, and oak savannah communities occurring in close proximity. Together, these conditions produce a high degree of

botanical diversity within a relatively small area. Management of these lands as an ACEC would help conserve plant diversity and ecological variation within this upper portion of the Klamath River canyon and provide for consistent management of these values across the contiguous ACEC landscape. Other land use allocations such as riparian reserve and late successional reserve may contribute to the conservation of botanical diversity in the proposed ACEC area but lack the geographic breadth to be effective on their own.

Ecological Recovery Following Dam Removal

The proposed ACEC encompasses a river corridor shaped in part by the largest dam removal and river restoration project ever undertaken. Most of the proposed ACEC area was not directly affected by hydropower infrastructure but the western edge of the proposed ACEC includes the sites of the former powerhouse, penstock, diversion structures, canal, and access roads, all of which have been fully removed. Extensive restoration actions have been implemented, including slope stabilization and revegetation with native species,⁶ and additional restoration is ongoing.

This reach is now in an early and sensitive stage of ecological recovery. Riparian and upland plant communities are reestablishing through both active restoration and natural succession, while geomorphic and hydrologic processes continue to adjust following a century of alteration. These recovering landscapes are particularly vulnerable to disturbance, including soil destabilization, invasive species establishment, and disruption of revegetation efforts. Special management attention is therefore warranted to protect restoration investments, allow natural processes to proceed, and ensure the long-term recovery of native habitats and ecological function within the canyon.

5. ADDITIONAL BENEFITS

Recreational Opportunities

The proposed Upper Klamath River Canyon ACEC provides significant recreational opportunities associated with a restored free-flowing river and a relatively undeveloped canyon landscape. The recreational values present in this reach represent important public benefits that are closely tied to the natural systems and scenic character of the river corridor.

⁶ Klamath River Renewal Corporation (2020). [Amended Application for Surrender of License for Major Project and Removal of Project Works, FERC Project No. 14803, Exhibit A: Definite Decommissioning Plan](#). See Exhibit A-1, Section III (Definite Decommissioning Plan) and Chapter 4 (Post-Drawdown Site Restoration).

Whitewater Recreation

Following the removal of J.C. Boyle Dam in 2024 and the restoration of continuous flows, this reach of the Upper Klamath River has emerged as a high-quality whitewater boating resource. The reach—commonly referred to as the “Big Bend Run”—offers a continuous sequence of rapids within a steep and confined canyon setting, providing a boating experience that rivals or exceeds that of the well-known Hells Corner reach immediately downstream.

The Final Whitewater Boating Study conducted in support of the Klamath dam removal project identifies this reach as suitable for a range of boating flows and recognizes the contribution of spring inflows to maintaining reliable baseflow conditions. These spring accretions provide a consistent hydrologic foundation for boating, particularly during the summer and early fall when flows in other river systems may be limited.

American Whitewater has identified this reach as a high-quality whitewater resource with challenging rapids, continuous gradient, and scenic canyon setting.⁷ The combination of reliable flows, restored river continuity, and high-quality whitewater features makes this reach an important addition to the region’s portfolio of whitewater opportunities and enhances recreational use of the broader Upper Klamath River corridor.

Angling

The proposed ACEC also supports outstanding angling opportunities, particularly for native redband trout. The Upper Klamath River in this area is widely recognized for its high-quality redband trout fishery, supported by cold-water spring inputs that stabilize temperatures and enhance aquatic habitat conditions.

The Oregon Department of Fish and Wildlife (ODFW) identifies redband trout in the Upper Klamath Basin as a species of conservation importance and manages portions of the basin as Redband Trout Conservation Areas (RTCA) to protect strongholds of native populations and their habitats. The Upper Klamath River and its tributaries are recognized as supporting some of the most important remaining redband trout populations in Oregon, reflecting both ecological significance and recreational angling value.

The combination of spring-fed flows, thermal stability, and complex habitat in the proposed ACEC contributes to high-quality angling conditions and supports resilient native fish populations. Following dam removal and the reestablishment of natural flow and temperature regimes, these conditions are expected to further improve and may also support expanding

⁷ See [Klamath River - Moonshine Falls Access to Spring Island \(Big Bend Run\)](#) for a description of the whitewater boating run.

opportunities for angling associated with anadromous species as they reestablish in the upper basin.

Other Recreation and Experiential Values

In addition to river-based recreation, the proposed ACEC provides opportunities for a variety of dispersed and low-impact recreational uses. The steep canyon landscape, relative isolation, and limited development create opportunities for birdwatching, nature observation, photography, and off-trail hiking. The area supports a diversity of bird species associated with riparian and canyon environments, is along the Pacific flyway, and offers high-quality opportunities for wildlife observation.

The canyon also provides opportunities for solitude and quiet recreation that are increasingly uncommon in more developed or accessible landscapes. The combination of scenic quality, natural soundscape, and limited infrastructure contributes to a sense of remoteness and immersion in a natural environment.

These recreational opportunities are directly dependent on the natural systems, scenic values, and restored free-flowing conditions of the river corridor. Management of the proposed ACEC would help maintain the environmental conditions that support these uses, while ensuring that recreation remains compatible with the protection of the area's relevant and important values.

6. ANALYSIS OF THE APPLICABILITY OF ACEC CRITERIA

Relevance

The proposed Upper Klamath River Canyon ACEC meets the relevance criterion under 43 C.F.R. 1610.7-2(d)(1) as it contains important natural systems and processes, fish and wildlife resources, scenic values, and cultural resources.

The area encompasses a restored free-flowing segment of the Upper Klamath River characterized by a groundwater-dominated, gaining river system with substantial spring-fed inputs that regulate flow and temperature. These processes create cold-water refugia that support native fish species, including redband trout and reestablishing anadromous salmonids.

The canyon corridor and adjacent lands provide important aquatic, riparian, and upland habitat supporting migratory birds, raptors, and large mammals, consistent with values previously recognized by BLM within the Upper Klamath River corridor. The landscape also exhibits high scenic value, with steep, confined canyon topography, a restored free-flowing river, and a largely undeveloped visual character forming part of a continuous scenic corridor.

The area is further recognized as part of an ongoing Native American cultural landscape with both historical and contemporary significance.

Collectively, these characteristics demonstrate that the proposed ACEC contains multiple resource values identified in 43 C.F.R. 1610.7-2(d)(1) and satisfies the relevance criterion.

Importance

The proposed ACEC meets the importance criterion under 43 C.F.R. 1610.7-2(d)(2) as the identified values are distinctive, regionally significant, and contribute to ecosystem resilience, landscape intactness, and habitat connectivity.

The concentration of large-volume, cold-water spring inputs creates a unique thermal system that is critical to sustaining fish populations under elevated summer temperatures and to the successful reestablishment of anadromous salmonids. The scale and downstream influence of these inputs distinguish this reach within the Upper Klamath River.

The proposed ACEC contributes to landscape-scale habitat connectivity by linking upstream restored river segments with downstream ACECs and the designated Wild and Scenic River corridor, supporting species movement and ecological function. Its steep, confined topography and relatively undeveloped condition further contribute to high scenic integrity and landscape intactness.

The area is also in an early and sensitive stage of ecological recovery following dam removal. Restored hydrologic and ecological processes, along with ongoing revegetation and habitat recovery, are vulnerable to disturbance and represent values of heightened concern.

The cultural and tribal values associated with the river are also of particular importance. The area is part of an ongoing Native American cultural landscape with significant spiritual, cultural, and subsistence value. The return of anadromous fish following dam removal represents a meaningful ecological and cultural restoration, supporting renewed cultural practices and reinforcing longstanding relationships between Indigenous communities and the Klamath River.

These factors demonstrate that the proposed ACEC contains values of special worth and regional significance and therefore meets the importance criterion.

Requires Special Management Attention

The proposed ACEC requires special management attention under 43 C.F.R. 1610.7-2(d)(3) because the identified values are vulnerable to degradation and would not be adequately protected under existing management alone.

The groundwater-driven hydrologic and thermal processes depend on intact upland, riparian, and spring-influenced environments. Surface disturbance, vegetation removal, and road development could alter groundwater flow, spring expression, and associated aquatic conditions.

Cold-water refugia and associated fish habitat are sensitive to changes in flow, temperature, and sediment input, while scenic values are susceptible to visual intrusions and surface disturbance. Areas undergoing post-dam ecological recovery are particularly vulnerable to soil destabilization, invasive species, and disruption of revegetation.

Cultural resources and ongoing Native American use further necessitate careful management and coordination with Tribes.

Absent ACEC designation, anticipated land management changes, including increased emphasis on timber production, could increase the risk of disturbance to these values.

These vulnerabilities demonstrate that targeted management prescriptions are needed to protect hydrologic processes, habitat conditions, scenic integrity, and cultural values—protections that would not be fully achieved without ACEC designation. Accordingly, the proposed ACEC meets the requirement for special management attention.

7. CONCLUSION

As summarized in this nomination, the proposed Upper Klamath River Canyon ACEC within BLM's Lakeview District supports regionally significant resources and values, including: (1) Natural Systems and Free-Flowing River Processes, (2) Fish and Wildlife Habitat, (3) Scenic River and Canyon Landscapes, (4) Cultural and Tribal Resources and Significance, (5) Botanical Diversity and Distinctive Plant Communities, and (6) Ecological Recovery Following Dam Removal.

These lands present a strategic opportunity to conserve a restored free-flowing river corridor and associated canyon landscape within a broader, contiguous system of protected and eligible lands along the Upper Klamath River.

Based on the information presented, the proposed ACEC meets the criteria of relevance and importance under DOI regulations and BLM Manual 1613. The area's resources and values also require special management attention, as existing and anticipated land uses may be incompatible with their conservation absent specific management attention under current or revised resource management plan.

Pursuant to FLPMA, 43 U.S.C. 1701 et seq., this nomination requests that BLM designate the Upper Klamath River Canyon area as an Area of Critical Environmental Concern as part of the ongoing Resource Management Plan revision for southwestern Oregon.

Thank you for your consideration.

Sincerely,



Scott Harding
Stewardship Associate
American Whitewater
PO Box 34
Forks of Salmon, CA 96031
scott@americanwhitewater.org



Thomas O'Keefe, PhD
Director of Policy and Science
American Whitewater
3537 NE 87th St.
Seattle, WA 98115
okeefe@americanwhitewater.org

ATTACHMENT A

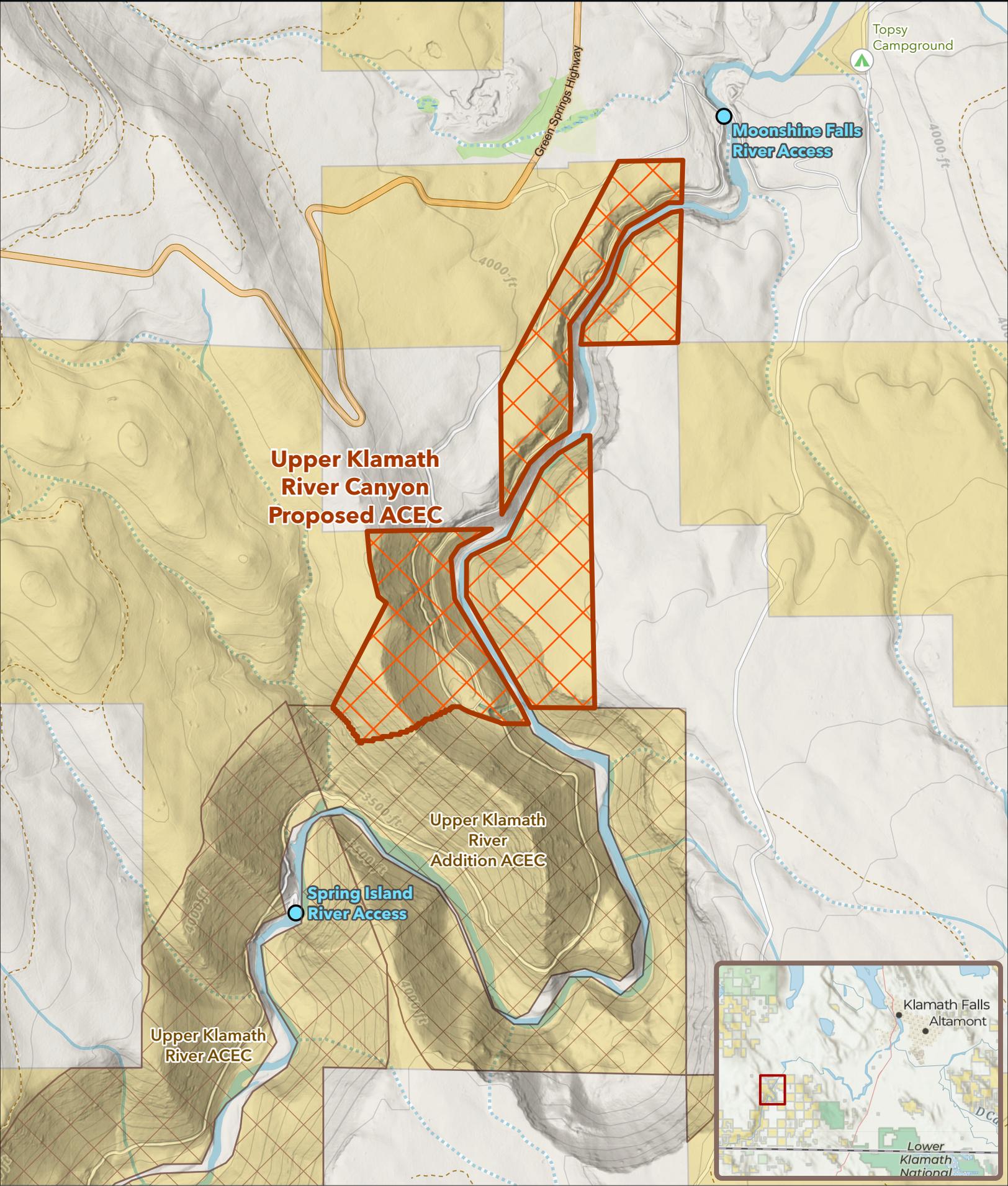
MAP OF THE PROPOSED UPPER KLAMATH RIVER CANYON ACEC

[map is shown on next page]

Geospatial data for the proposed ACEC are available here:

- [ZIP shapefiles](#)
- [LPKX layer package](#)
 - [PDF map](#)

Upper Klamath River Canyon Proposed ACEC



ATTACHMENT B

PHOTOS OF THE PROPOSED UPPER KLAMATH RIVER CANYON ACEC

[photos begin on next page]



View from northern edge of proposed Upper Klamath River Canyon ACEC, looking downriver along the Klamath River to Mount Shasta in the distance. Photo: Paul Robert Wolf Wilson.



Rough approximation of the proposed Upper Klamath River Canyon ACEC, looking downriver along the Klamath River to Mount Shasta in the distance. Photo: Paul Robert Wolf Wilson.



Morning in the Upper Klamath River Canyon near the downstream end of the proposed ACEC (42.105106, -122.060408). Photo: Scott Harding.



Kayaking in the Upper Klamath River Canyon near the middle of the proposed ACEC with western canyon wall in sunlight (42.109489, -122.056489). Photo: Scott Harding.



Kayaking in the Upper Klamath River Canyon near the middle of the proposed ACEC (42.109542, -122.056519). Photo: Scott Harding.

**Evaluation of the Restored Upper Klamath River
for Wild and Scenic River Eligibility
(Big Bend Reach)**

Submitted by American Whitewater
March 21, 2026

In Response to the February 19, 2026 Notice of Intent to Revise
Resource Management Plans for Western Oregon

This document provides American Whitewater’s comments to the Bureau of Land Management regarding evaluation of the restored Upper Klamath River for eligibility for inclusion in the National Wild and Scenic Rivers System. The analysis addresses the reach between the former J.C. Boyle Dam site and the J.C. Boyle Powerhouse (the “Big Bend reach”), where removal of hydropower infrastructure has restored free-flowing condition and must be evaluated under current conditions as part of the Resource Management Plan revision.

1. ISSUE OVERVIEW AND CONTEXT

Since the BLM adopted its Southwestern Oregon Resource Management Plan in 2016, four dams and associated hydropower infrastructure have been removed from the Klamath River in Oregon and California. In 2024, the J.C. Boyle Dam, its diversion infrastructure, and associated powerhouse were removed, restoring continuous free-flowing condition to the 4.5-mile reach of the Klamath River between the former dam site and the former powerhouse (hereafter, the “Big Bend reach”) on BLM-managed lands within the RMP planning area.¹

The BLM previously evaluated this reach for Wild and Scenic River (WSR) eligibility in 1990. In that study, the BLM found that the reach possessed outstandingly remarkable values, but determined it to be ineligible because it lacked free-flowing condition. At that time, the J.C. Boyle Dam diverted the vast majority of the river’s flow into a canal and penstock leading to the powerhouse, substantially and continuously diminishing flow through approximately 4.5 miles of river channel.

These changed conditions present a distinct planning issue for this RMP revision. The 1990 eligibility determination was based on conditions that no longer exist. With dam removal and

¹ View the Big Bend reach in context with land management boundaries on American Whitewater’s [Upper Klamath River Management Landscape Map](#) (river reach depicted in purple).

restoration of the river, the factual basis of that determination has changed. As a result, the prior ineligibility determination no longer applies, and the reach now functions as a continuous, free-flowing river system with natural processes reestablished.

The BLM has a statutory obligation under the Wild and Scenic Rivers Act (WSRA) to consider potential additions to the National Wild and Scenic Rivers System in its land use planning. The WSRA specifically provides that rivers restored to free-flowing condition are eligible for inclusion where they also possess one or more outstandingly remarkable values. Accordingly, the BLM is required to evaluate the Big Bend reach for WSR eligibility as part of this RMP revision.

2. PRIOR BLM ELIGIBILITY DETERMINATION (1990 STUDY)

In its Final Eligibility and Suitability Report for the Upper Klamath River (March 1990), BLM evaluated the reach between J.C. Boyle Dam and the J.C. Boyle Powerhouse (then identified as Segment 1). BLM concluded that this segment was ineligible for inclusion in the National Wild and Scenic Rivers System because it did not meet the definition of a free-flowing river, citing both substantial and continuous diversion of flow associated with the J.C. Boyle hydroelectric development and physical modification associated with that development.

Importantly, BLM identified two outstandingly remarkable values (ORVs) in this reach—fish resources and fishing—establishing that the reach satisfied the ORV component of eligibility at the time of the study.

Accordingly, the 1990 ineligibility determination for this reach was contingent on the absence of free-flowing condition under then-existing project conditions, and not on a lack of outstandingly remarkable values. This distinction is critical to evaluating the reach under current conditions.

3. CHANGED CONDITIONS: RESTORATION OF FREE-FLOWING CONDITION

In 2024, as part of the Klamath River dam removal project implemented by the Klamath River Renewal Corporation, the J.C. Boyle Dam, diversion works, canal, penstocks, and powerhouse were fully removed. Continuous, unimpeded flow through the Big Bend reach has been restored, eliminating the diversion that formed the primary basis for the 1990 finding that the reach was not free-flowing.

Physical alterations associated with the former Boyle hydropower development were also addressed. Modifications to the waterway at and immediately below the former dam site were removed, and the channel was restored to approximate pre-dam conditions. To the extent the

1990 study relied on disturbance associated with the former canal and related hillslope modification. The diversion penstock, canal, and tunnel were removed and the impacted land on the river's western canyon slope has been graded and revegetated and is now undergoing natural restoration processes. Although the canal route is still visually discernible in places, the river's waterway is not modified by its former presence. Boulders that had entered the river below the canal route and posed issues for fish migration and boater safety have been blasted or otherwise mitigated to the degree that they no longer impact the waterway.

The reach is now hydrologically and ecologically connected, with flow, sediment transport, aquatic habitat continuity, and navigability restored. These changes reestablish conditions necessary to support native fish populations and other river-dependent resources and values.

4. STATUTORY REQUIREMENTS AND AGENCY POLICY

The Wild and Scenic Rivers Act and BLM policy require evaluation of the Big Bend reach in this planning process.

Section 2(b) of the WSRA defines an eligible river as a free-flowing stream and its related land area possessing one or more outstandingly remarkable values. It further provides that "[e]very wild, scenic or recreational river in its free-flowing condition, **or upon restoration to this condition**, shall be considered eligible for inclusion in the national wild and scenic rivers system" [emphasis added].

Section 5(d)(1) of the WSRA directs federal agencies to consider potential additions to the National Wild and Scenic Rivers System when developing land and water resource plans. That requirement applies here. The Big Bend reach flows through BLM-managed lands within the Southwestern Oregon RMP planning area and, because it has been restored to free-flowing condition, must be considered under current conditions rather than excluded based on a determination tied to conditions that no longer exist.

BLM's own policy is consistent with this statutory framework. Manual 6400 directs that the agency's study report "address **all rivers** that possess free-flowing condition and outstandingly remarkable values and flowing wholly or partially on BLM-administered lands..." [emphasis added]. This directive makes clear that BLM is not afforded discretion to omit potentially qualifying river segments from eligibility consideration in the land use planning process.

Under the WSRA and BLM policy, Wild and Scenic eligibility evaluation of the Big Bend reach is required, not discretionary.

5. OUTSTANDINGLY REMARKABLE VALUES

The Big Bend reach possesses outstandingly remarkable values (ORVs), including those previously identified by BLM in 1990 and additional values that have emerged or been substantially enhanced following restoration of free-flowing condition.

Previously Identified ORVs

BLM identified two ORVs in this reach² in 1990: fish resources and fishing. These values are now substantially strengthened under restored conditions. It is appropriate to evaluate these as (1) fish habitat and (2) angling using contemporary approaches to ORV identification. Restoration of continuous flow and the resulting reconnection of habitats have improved overall habitat function throughout the reach.

A defining feature of this reach is the presence of substantial cold-water inputs that create localized thermal refugia and increase river flows. These features provide critical temperature moderation and holding habitat, particularly during warm summer periods, and are of heightened importance in a warming climate. With the return of anadromous fish, including reestablished spawning and year-round use by salmonids, these thermal refugia now support functions—such as migration, holding, and survival—that were previously constrained under diverted conditions and unavailable to anadromous fish that were blocked by downstream dams. Together, these factors elevate both the ecological significance of the fish habitat and the quality and importance of the associated fishery, improving angling opportunities and potentially creating new opportunities for anadromous species as populations reestablish.

Whitewater Recreation

The restored reach now supports exceptionally high-quality whitewater boating. Prior to dam removal, boating opportunities in this reach were highly constrained and rare, limited primarily to short-duration stormflow releases that very few boaters were able to experience. Under post-dam conditions, the reach now provides consistent and predictable boating opportunities across a broad range of flows for most or all of the year.

The Big Bend Run,³ as boaters refer to it, is readily accessible by paved road and a short section of maintained gravel road and is located in close proximity to the Rogue Valley and Klamath Falls population centers, making it one of the most sought-after high-quality whitewater runs in the

² In the 1990 report, BLM identified this reach as “Segment 1.” For clarity and readability, this document refers to it as the “Big Bend reach,” a commonly used local place name.

³ See American Whitewater, [Klamath River - Moonshine Falls Access to Spring Island \(Big Bend Run\)](#)

region. Most boaters enjoy the Big Bend Run as a day trip, launching near the former J.C. Boyle Dam site and taking out at BLM's Spring Island River Access.

There are more than 15 significant rapids in the Big Bend reach, making it the steepest and most action-packed section of whitewater on the Klamath River. The canyon scenery is exceptional and, in places, more confined than other reaches along the Klamath Rim. The run is continuous with and complements the well-known Hells Corner Run, and some boaters link the two for a long day trip or as part of a longer overnight river trip that often includes other restored reaches of the Klamath.

The dam removal project included construction of a new river access facility below the former J.C. Boyle Dam to provide year-round boating access to the reach. Additional access is available at Pioneer Park West. These facilities reflect demonstrated demand and contribute to the reach's recreational significance and its outstandingly remarkable whitewater recreation value.

The dam removal project also included targeted mitigation of in-stream rock hazards associated with the former hydropower diversion canal. Together with earlier fish passage improvements at the same site (Sidecast Slide), these efforts have restored both upstream fish passage and downstream boat passage such that the former obstructions are no longer apparent.

The reach has already attracted substantial interest and use from the boating community and has received regional and national attention as part of the broader Klamath dam removal and river restoration project. Available information and study reports indicate that it provides a regionally—and increasingly nationally—significant whitewater boating experience that qualifies as an outstandingly remarkable value under the WSRA.

Other Potential ORVs

This reach also reflects a unique and nationally significant restoration context. The Klamath River was historically dammed and diverted for hydropower and has now been restored through the largest dam removal and river restoration project undertaken to date. The WSRA allows for evaluation of "other" outstandingly remarkable values that are unique to individual river systems. The Klamath's restoration history may qualify as such a value and warrants evaluation in this context.

The restoration of free-flowing condition has also improved wildlife habitat and likely improved species diversity and populations. Any values affected by changed conditions should be evaluated anew in the context of WSR eligibility.

Re-Evaluation of Native American Traditional Use and Prehistory ORVs

The BLM must consult with Tribes and Indigenous communities in evaluating Native American traditional use and prehistory ORVs. Although the 1990 evaluation did not identify these values for the Big Bend reach, it is not clear that they are absent. These values should be re-evaluated based on current information and consultation.

These values and others collectively warrant evaluation by the BLM as outstandingly remarkable within the context of this planning process and support consideration of the Big Bend reach as eligible for inclusion in the National Wild and Scenic Rivers System.

6. ELIGIBILITY DETERMINATION

The Big Bend reach now meets the eligibility criteria set forth in Section 2(b) of the Wild and Scenic Rivers Act. The reach is free-flowing under current conditions and possesses multiple outstandingly remarkable values, including those previously identified by BLM and additional values that have emerged or been substantially enhanced following restoration. The prior determination of ineligibility was based on conditions that no longer exist and therefore does not apply to the present analysis.

Accordingly, the BLM should find the Big Bend reach eligible for inclusion in the National Wild and Scenic Rivers System and carry that determination forward in this RMP revision.

BLM typically evaluates eligibility and suitability concurrently. The Big Bend reach occurs on and adjacent to BLM-managed lands, is directly connected to an existing designated Wild and Scenic River segment, and is associated with existing and proposed protective management designations, including ACECs. These factors are consistent with the considerations identified in BLM Manual 6400 and indicate that the reach is well-suited for protective management. However, at a minimum, the BLM must complete an eligibility determination based on current conditions as part of this planning process.

BLM policy also requires coordination and consultation with Tribes, other agencies, and interested stakeholders in the evaluation of potential Wild and Scenic Rivers. This includes engagement at all stages of the eligibility and suitability process to ensure that outstandingly remarkable values—including tribal, cultural, recreational, and ecological values—are fully identified and evaluated based on current conditions. The BLM should ensure that this process is carried out consistent with Manual 6400 and associated guidance as part of this RMP revision.

7. RELATIONSHIP TO UPPER KLAMATH RIVER CANYON ACEC NOMINATION

American Whitewater is submitting a nomination for the Upper Klamath River Canyon Area of Critical Environmental Concern (ACEC) concurrently with these comments. The ACEC nomination and the Wild and Scenic River (WSR) eligibility evaluation address the same river reach and underlying resource values but arise under different statutory authorities and serve distinct, complementary purposes.

ACEC designation under the Federal Land Policy and Management Act (FLPMA) is a management tool intended to provide special management attention to protect important values, including river-related resources, outstandingly remarkable values, and the river's immediate environment. The proposed ACEC focuses on the river corridor and canyon lands that support and influence the river's ecological, recreational, scenic, and cultural values.

The WSR eligibility evaluation identifies whether the Big Bend reach meets the criteria for potential inclusion in the National Wild and Scenic Rivers System. The ACEC designation, by contrast, provides a mechanism for the BLM to manage and protect those same values within the RMP framework, regardless of the timing or outcome of any future WSR designation process.

Accordingly, the ACEC nomination is independent of, but complementary to, the WSR eligibility evaluation. Together, they provide a coordinated approach to recognizing and managing the significant values of the Upper Klamath River and its canyon corridor.

8. CONCLUSION

The removal of J.C. Boyle Dam and associated hydropower infrastructure has fundamentally changed the conditions of the Big Bend reach, restoring free-flowing condition and reestablishing the river's natural processes and values. The prior determination of ineligibility was based on conditions that no longer exist and does not apply to the present analysis.

Under the Wild and Scenic Rivers Act and BLM policy, the agency is required to evaluate all rivers that are free-flowing and possess outstandingly remarkable values as part of its land use planning process. The Big Bend reach clearly meets these criteria.

Accordingly, the BLM must evaluate the Big Bend reach for Wild and Scenic River eligibility based on current conditions as part of this RMP revision and carry that determination forward in its planning decisions.

Sincerely,



Scott Harding
Stewardship Associate
American Whitewater
PO Box 34
Forks of Salmon, CA 96031
scott@americanwhitewater.org



Thomas O'Keefe, PhD
Director of Policy and Science
American Whitewater
3537 NE 87th St.
Seattle, WA 98115
okeefe@americanwhitewater.org