



SUBMITTED BY E-MAIL

November 8, 2013

Mr. Jerry Perez, State Director  
Oregon Office of Bureau of Land Management  
1220 S.W. 3rd Avenue  
Portland, OR 97204

Robyn Thorson, Pacific Northwest Regional Director  
U.S. Fish & Wildlife Service  
911 NE 11th Ave  
Portland Oregon 97232

***Re: Oregon Desert Trail Proposal***

Dear Mr. Perez & Ms. Thorson:

With this letter and the attached information, I request consideration of the Oregon Desert Trail proposal on behalf of over 4,500 members and supporters of **Oregon Natural Desert Association (ONDA)** and with support from **Oregon Sierra Club** (<http://oregon.sierraclub.org/>), a member-supported, public interest organization that promotes conservation of the Oregon natural environment by influencing public policy decisions, **the Outdoor Alliance** ([www.outdooralliance.net/](http://www.outdooralliance.net/)), a national coalition that protects and promotes the human-powered outdoor recreation experience by uniting the voices of thousands of outdoor enthusiasts to influence policy for America's public lands, **American Hiking Society** ([www.americanhiking.org](http://www.americanhiking.org/)), a national organization that promotes and protects foot trails, their surrounding natural areas, and the hiking experience, **Back Country Horsemen Of Oregon** ([www.bcho.org](http://www.bcho.org/)), a statewide organization that works to maintain equestrian access to public lands, and **American Whitewater** ([www.americanwhitewater.org/](http://www.americanwhitewater.org/)), a membership organization representing a broad diversity of individual whitewater enthusiasts, river conservationists, and more than 100 local paddling club affiliates across America that works to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely.

We collectively request that you consider the establishment of the proposed Oregon Desert Trail route as a National Recreation Trail "Connecting Trail" to the existing "Oregon High Desert National Recreation Trail" and the "Fremont National Recreation Trail." Your empowerment and responsibility to analyze and recommend a "Connecting Trail" for Secretarial approval is established by the National Trails System Act (P.L. 90-543) and associated agency guidance (BLM Manual 8353, Section 1.4 B.3). I hope you find that the associated document and request thoroughly address the identification and evaluation requirements for "Nominating National Recreation Trails" as described in agency guidance and we look forward to assisting you in the evaluation and establishment of this trail.

## OREGON DESERT TRAIL OVERVIEW

In 2011, the Oregon Natural Desert Association (ONDA) began work on a three-year project to determine a long-distance, non-motorized trail route on public lands that passes through many of the natural and cultural wonders of central and southeastern Oregon. This route—referred to as the Oregon Desert Trail (ODT)—is approximately 750 miles long. It links existing trails, two-track roads of varying conditions, other routes including historical wagon roads, and many miles of cross-country terrain. The proposed route stretches from the Oregon Badlands Wilderness east of Bend to Lake Owyhee State Park near the Oregon-Idaho border. All of the ODT is currently open to hiking, and many sections are appropriate for mountain biking, horse riding, and kayaking, canoeing or rafting.

Over the past three years, the proposed ODT route has been inventoried by over a hundred volunteers as well as members of the ONDA staff. The inventory has captured photos, written and GPS documentation of trail and route conditions, water sources, wildlife, vegetation, and items of cultural and historical significance—thereby providing a general overview of the ODT’s features. The initial route inventory was completed in the fall of 2012. In June and July of 2013, Sage Clegg, an experienced long-distance hiker, completed the first through-hike of the ODT as a trial run of this new trail. The data she collected supplemented the previous three years of data; all of the on-the-ground inventory information was used to develop the attached ODT Guide and Maps.

Trail routes like the ODT are not new to Oregon—the iconic Pacific Crest Trail is a developed hiking trail that runs north-south through the Cascades stretching from Mexico to Canada. The existing “Desert Trail,” envisioned and partially established by the Desert Trail Association<sup>1</sup>, runs parallel to the Pacific Crest Trail through the High Desert Plateau regions of Montana, Idaho, Oregon, Nevada and California also stretching from Mexico to Canada. The ODT is proposed to overlap with a north-south section of the Desert Trail known as the “Oregon High Desert National Recreation Trail” running along the Pueblo Mountains and Steens Mountain in southeast Oregon. This existing route, primarily marked by rock cairns, is recognized on Pacific Northwest Recreation Maps as “Desert Trail (unmarked corridor).”

One aim of the Oregon Desert Trail project is to establish the ODT route as an official trail, much in the way that the “Desert Trail” is designated on recreation maps. However, it is NOT an aim of the project to develop a trail like the PCT’s single-track, but rather to use the existing network of trails, roads, and cross-country sections to form a hiking “corridor.” The Grand Enchantment Trail in Arizona and New Mexico is an example of an ODT-like route that pieces together existing infrastructure and cross-country

### **ODT FACTS**

**Total Length:** 766 miles

**Highest point:** Steens Mountain (9550 feet)

**Lowest point:** Owyhee Reservoir (2670 feet)

**Longest stretch of cross-country travel:** Anderson Crossing to Three Forks (46 miles)

---

<sup>1</sup> See the Desert Trail Association’s website at <http://www.thedeserttrail.org> for more details.

travel to link many of that region's natural wonders and is commonly described as a "wilderness trekking route."<sup>2</sup>

As important as stating what the ODT is, it is equally important to note what the ODT is NOT:

1. The ODT is NOT a developed trail like the PCT or other single-wide tread trails. The ODT concept embraces the wide-open nature of Oregon's desert landscape. Part of the value of the ODT is using developed trails and roads where they exist, but also keeping long stretches open to cross-country travel. These off-trail sections are important to the "wild and undeveloped" aspect of many parts of the route.
2. The ODT is NOT exclusively for hiking and backpacking. Many sections of the route are great for mountain biking, horse riding, and even kayaking or canoeing.
3. The ODT is NOT intended for motorized travel. It is designed for non-motorized, "quiet" recreation in order to minimize conflicts with existing uses, natural and cultural resources and maximize enjoyment of the wild and open spaces. Because the ODT uses many open motorized routes, there are portions that are shared with motorized travel.

The trail passes through both well-known and lesser known lands throughout Oregon's high desert. The route was specifically developed to avoid sensitive wildlife habitat and cultural sites, to be on public lands or use public right-of-ways, to utilize existing sources of water where possible, and to overlap as much as possible with public lands that are currently prioritized for conservation management. The route travels through lands managed by the Bureau of Land Management (BLM) (79%), U.S. Forest Service (13%) and U.S. Fish and Wildlife Service (7%), and Oregon State Lands (1%). The common theme is that many of these lands are currently in some form of permanent or temporary federal protection.

For example, the proposed path includes currently protected areas such as the Steens Mountain Cooperative and Protection Area (CMPA) and Wilderness, the Hart Mountain National Antelope Refuge, as well as numerous Wilderness Study Areas (WSAs) which have remained temporarily protected for nearly three decades and are currently managed by the BLM for their wilderness values (refer to table on following page). 39% of the route lies within these permanently or temporarily protected areas—26% in WSAs (197 miles), 7% in National Wildlife Refuges; and 6% in Wilderness Areas (46 miles). An additional 30% (222 miles) of the route travels through citizen-proposed wilderness areas and areas the BLM has identified as "lands with wilderness characteristics." As areas already dedicated to wildlife conservation and primitive recreation, the existing designations complement the core goals of the ODT.

---

<sup>2</sup> See the Grand Enchantment Trail's website at <http://www.simblissity.net/get/> for more details.

## Core Goals of the Oregon Desert Trail

The goals of establishing the Oregon Desert Trail encompass conservation, wildlife connectivity, recreation, economy, and connecting the public to their lands. First and foremost, the ODT will help develop greater public awareness of the conservation value of Oregon’s high desert by connecting people with this amazing landscape. While there are some guidebooks that describe hikes and explorations in central and southeast Oregon<sup>3</sup>, public knowledge about many of the state’s most unique natural features is sparse. The intent is also to highlight the interconnected nature of this landscape and the movement of people and wildlife across this vast area. The ODT will help open doors for outdoor enthusiasts who may be unfamiliar or unsure about exploring Oregon’s high desert and allow them to do it in a way that respects the cultural, historical and biological values of this area.

A second goal of the project is to provide and publicize more opportunities for non-motorized, “quiet” recreation, which represents a growing sector of Oregon’s economy but is relatively underrepresented in Oregon’s high desert. The ODT would provide more structured opportunities for non-motorized recreation in the form of hiking, biking and horseback riding routes. The ODT is important because of the lack of developed non-motorized trails in this part of the state; for hikers the ODT greatly increases the opportunity for day hikes, multi-day backpacks, or even a 750-mile through-hike.

### **PROTECTED AREAS (BOTH TEMPORARY AND PERMANENT) ALONG THE OREGON DESERT TRAIL**

- |  |                                  |
|--|----------------------------------|
| 1. Oregon Badlands Wilderness                | 13. Willow Creek WSA             |
| 2. Squaw Ridge Lava Bed WSA                  | 14. Disaster Peak WSA            |
| 3. Sand Dunes WSA                            | 15. Fifteen Mile Creek WSA       |
| 4. Diablo Mountain WSA                       | 16. Oregon Canyon WSA            |
| 5. Abert Rim WSA                             | 17. Upper West Little Owyhee WSA |
| 6. Hart Mountain National Antelope<br>Refuge | 18. Owyhee River WSA             |
| 7. Orejana Canyon WSA                        | 19. Lower Owyhee Canyon WSA      |
| 8. Malheur National Wildlife Refuge          | 20. Owyhee Breaks WSA            |
| 9. Steens Mountain Wilderness                | 21. Blue Canyon WSA              |
| 10. Pueblo Mountains WSA                     | 22. Slocum Creek WSA             |
| 11. Red Mountain WSA                         | 23. Honeycombs WSA               |
| 12. Mahogany Ridge WSA                       | 24. Wildhorse Basin WSA          |

---

<sup>3</sup> The most popular amongst desert hikers are likely William Sullivan’s “100 Hikes: Travel Guide Eastern Oregon” and Andy Kerr’s “Oregon Desert Guide-70 Hikes”.

A third goal of the ODT project is to establish the trail and the surrounding landscapes as an asset for numerous communities throughout Oregon’s high desert and to build dialogue and relationships between trail users, residents and other visitors to public lands surrounding these communities. For hikers, bikers, equestrians and other public land recreationists, nearby towns are vital resupply points where food and supplies can be mailed or purchased. As such, neighboring towns may benefit from fuel, food and other sales associated with increased visitation.

Benefits of an Official Oregon Desert Trail: Towns, Agencies, and Recreationists

“An organized trail system is a desirable amenity and can contribute to the economic vitality of the community.” This conclusion, reached in a recent fact sheet<sup>4</sup> by the American Hiking Society, underscores the importance of creating and maintaining official non-motorized routes across America. While the ODT would not bring the millions of dollars per year that other popular trails bring to nearby communities, the ODT would be an economic benefit to the small towns on and near the trail.

There are twelve towns and cities that the trail passes through or near (see table on following page). Amenities of nearby towns are described in the attached trail guide. Some of these towns are well known for their hotels and milkshakes (e.g. Frenchglen and Fields, respectively), and some have a gas station, store and restaurant all in one building (e.g. Plush, Fields and Rome). The U.S. Post Offices and businesses in these towns could be utilized by through-hikers to mail supplies via general delivery. As is common in towns along popular trails such as the Pacific Crest Trail, over time it is our hope that communities along the route would take pride in being a key part of the Oregon Desert Trail.

The agencies that manage the public lands along the ODT will benefit from this route because it will help connect the public to their lands and greatly increase the opportunity for non-motorized recreation (hiking, biking, horseback riding, rafting) on lands where these opportunities are currently little-known. The trail concept highlights several primary goals of the America’s Great Outdoors<sup>5</sup> (AGO) project sponsored by President Obama. Three primary goals of the AGO vision, we believe, are strongly linked to the ODT concept. These three goals include: 1) Working Together for America’s Great Outdoors;

**COMMUNITIES ALONG THE ODT**

- Bend
- Christmas Valley
- Paisley\*
- Valley Falls
- Lakeview
- Plush\*
- Frenchglen\*
- Fields\*
- Denio (NV)\*
- McDermitt (NV)
- Rome\*
- Adrian

*\*Route passes through*

<sup>4</sup> Full report at <http://atfiles.org/files/pdf/econAHS.pdf>.

<sup>5</sup> Find more information at <http://americasgreatoutdoors.gov>.

2) Conserving and Restoring America's Great Outdoors; and 3) Connecting Americans to the Great Outdoors.

Two of the most popular recreational activities along the ODT are currently camping and exploring at Steens Mountain and boating on the Wild and Scenic Owyhee River. There are publications that advertise hikes in some high desert areas, but for someone looking at recreation maps of southeast Oregon for hiking options, clear choices are lacking outside Steens Mountain. Even the well-maintained Fremont National Recreation Trail does not see significant public use. Land agencies could use the Oregon Desert Trail as promotion of non-motorized recreation opportunities on their districts with minimal administrative and management effort.

Finally, as mentioned in the "Goals" section, equestrians, hikers, mountain bikers and other non-motorized recreation users would have a new long-distance trail route that could be hiked all at once or in small segments. This is consistent with BLM guidance that a "trail route has established public access points that accommodate a diversity of trip lengths and provide access to a variety of opportunities for recreation and education" (BLM Manual 8353, Section 1.10 3.i). Such uses also promote health and fitness for current and future generations while creating exposure and appreciation for some of the finest natural and wild areas that Oregon has to offer.

As an organization with over 4,000 members and supporters and an active base of volunteers that received the 2011 Oregon Governor's Volunteer Award, ONDA would be pleased to assist the BLM and USFWS in fulfilling the Conservation, Community Support, Public Information, and Trail Maintenance best management practices (BLM Manual 8353, Section 1.6 E.3). The engagement of such volunteers combined with the fact that this proposal does not include the construction of new trail or maintenance of existing trails should ensure that estimated annual maintenance costs are minor. In fact, the engagement of new volunteers might serve to reinvigorate trail maintenance on the existing National Recreation Trail sections described in this proposal and thereby assist the agencies in meeting existing agency requirements.

### **OREGON DESERT TRAIL SUMMARY**

The following outline of the ODT route is organized into four geographic regions: Central Oregon Volcanics, West Basin and Range, East Basin and Range, and Owyhee Canyonlands. For full trail section descriptions please see the attached "ODT trail guide". The section descriptions within the guide include a detailed summary of the trail, water sources, potential campsites, and information about the wildlife, vegetation, geology, cultural items, and seasonality/difficulty level. All trail descriptions are based on west to east travel.

#### **Central Oregon Volcanics (101 miles)**

The western hub of the ODT is located at the Oregon Badlands Wilderness Area east of Bend. The trail crosses Highway 20 and rounds the west side of Horse Ridge, heads southeast over Pine Mountain then turns south through the buttes along the national forest/BLM boundary until it reaches the east side of Squaw Mountain. The trail continues southeast around East Lava Field and east toward Peters Creek. The trail continues east-southeast to the Lost Forest Research Natural Area, staying east of the OHV

areas. After passing Sand Rock, the trail continues south to the Christmas Valley Highway. In this region, the ODT travels on lands managed by the Deschutes National Forest, Prineville BLM, and Lakeview BLM. See sections 1-4 for full trail descriptions of this region.

#### West Basin and Range (269 miles)

The West Basin and Range region enters a series of fault-block mountains and associated lake basins. From the Christmas Valley Highway, the ODT trends southwest toward Burma Rim and Diablo Peak, then south along Diablo Rim to the Red House Road that leads to Paisley. From Paisley the ODT takes the paved road south along the Chewaucan River to the Chewaucan Crossing Campground, and then takes the Fremont National Recreation Trail (NRT) south to Highway 395. The ODT picks up the Fremont NRT on the east side of Highway 395 at the Mill Trailhead and follows this trail north to the Vee Lake Campground. The ODT continues north along Abert Rim, turns east at Colvin Timbers, continues east through the Coyote Hills, and then briefly follows the Hogback Road south to Plush. From Plush, the ODT heads east and south around Hart Lake to the south end of Hart Mountain, then heads north along the eastern slope of Hart Mountain and Poker Jim Ridge through the Hart Mountain National Antelope Refuge. Near the Refuge's northern border the ODT turns east and follows a series of two-track roads to Frenchglen. In this region, the ODT travels on lands managed by the Lakeview BLM, Fremont National Forest, Hart Mountain National Antelope Refuge, The Nature Conservancy, and Burns BLM. See sections 5-12 for full trail descriptions of this region.

#### East Basin and Range (163 miles)

The East Basin and Range region generally follows the Desert Trail Association's "Oregon High Desert Trail" National Recreation Trail route (with a few deviations) from Frenchglen, over Steens Mountain, around the Alvord Desert, and south through the Pueblo Mountains. Where the Desert Trail exits the Pueblos near Denio, Nevada, the ODT then heads east through the Trout Creek Mountains and along the rim to the top of Oregon Canyon. Here the ODT descends through Oregon Canyon to the north, turns east at the mouth of the canyon, and makes its way across the flats to Highway 78. In this region the ODT travels on lands managed by the Burns BLM, Malheur National Wildlife Refuge, and Vale BLM. See sections 13-19 for full trail descriptions of this region.

#### Owyhee Canyonlands (213 miles)

In the Owyhee Canyonlands region, the ODT leaves Highway 95 to the east, climbs up High Peak and around the north end of Ten Mile Creek, eventually arriving at the headwaters of the West Little Owyhee River. Here the trail follows the West Little Owyhee, both in and parallel to the drainage, to Anderson Crossing. From Anderson Crossing the trail stays in the West Little Owyhee River's drainage to Five Bar. Here there are three options to get from Five Bar to Three Forks: the east route via South Cross Canyon and North Cross Canyon to the Middle Fork Owyhee (a route at moderate river flows), the central route staying in the Owyhee River drainage (at low river flows or via packraft), and the western route up Big Antelope Canyon and Big Springs Gorge then northeast on Skull Creek Road to Three Forks (at high river flows to avoid a river crossing). From Three Forks, the trail heads north overland along the eastern rim of the canyon. The ODT stays on the east side of the Owyhee River north of Rome and parallels the river on the east rim. The trail travels both cross-country and two-track roads past Lambert Rocks, the Birch Creek Road, and north along the reservoir to Leslie Gulch. From Leslie Gulch, the trail

heads north up Juniper Gulch and continues to Lake Owyhee State Park via Three Fingers Gulch, Painted Canyon, Juniper Ridge and Birch Creek. In this section, the ODT travels on lands managed by the Vale BLM, State of Oregon, Bureau of Reclamation, and Oregon State Parks. See sections 20-25 for full trail descriptions of this region.

### **REQUEST TO PUBLIC LAND MANAGEMENT AGENCIES**

The National Trails System Act (P.L. 90-543) provides for the administrative establishment by the Secretary of Interior of National Recreation Trails “within scenic areas and along historic travel routes of the Nation which are often more remotely located” (Section 2(a)ii). Further the Act seeks to “encourage and assist volunteer citizen involvement in the planning, development, maintenance, and management, where appropriate, of trails” (Section 2(c)).

Section 4(a) of the National Trails System Act states that the Secretary of Interior may “establish and designate national recreation trails, with the consent of the Federal agency, State, or political subdivision having jurisdiction over the lands involved, upon finding that—(i) such trails are reasonably accessible to urban areas, and, or (ii) such trails meet the criteria established in this Act and such supplementary criteria as he may prescribe.”

Furthermore, the fact that the ODT proposed route overlaps with two established National Recreation Trails (Oregon High Desert National Recreation Trail and the Fremont National Recreation Trail) provides a unique opportunity. Section 6 of the Act titled “Connecting and Side Trails” states that “Connecting or side trails with park, forest, and other recreation areas administered by the Secretary of Interior or Secretary of Agriculture may be established, designated, and marked by the appropriate Secretary as components of a national recreation, national scenic or national historic trail.” We urge you to use the “Connecting Trails” provision to expand the already designated Oregon High Desert National Recreation Trail to include the full ODT route proposal.

Since the US Forest Service lands that overlap with the ODT proposal are already part of a National Recreation Trail, our request for an expansion of the Oregon High Desert National Recreation Trail is limited to the portions of the ODT route which are managed by the US Fish and Wildlife Service and BLM and therefore fall under the management jurisdiction of the Secretary of Interior.

We believe that the Oregon Desert Trail presents a great collaborative opportunity for land agencies and public land users and we look forward to partnering with you on this effort. There is little that land agencies need to do to establish the ODT because volunteers have already undertaken the task of inventorying, mapping and cataloguing the route. To reiterate our earlier point, there is no need for trail construction or maintenance except in areas where this already exists. In moving this concept forward, we make the following additional requests to the BLM, US Forest Service and US Fish and Wildlife Service in connection with the establishment of the ODT:

1. Start by meeting with ONDA and other supporting organizations to share information and develop a better understanding of the proposal;

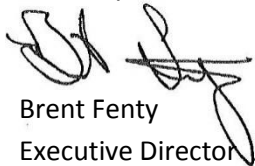


2. Review the proposed Oregon Desert Trail and work with ONDA and other interested parties to publicize the trail concept and make any necessary adjustments to the route to address landownership, environmental and/or cultural conflicts;
3. Review the application package and evaluate the concept through the appropriate NEPA analysis (BLM Manual 8353, Section 1.6 B.1);
4. Recommend the ODT as a "Connecting Trail" to the BLM Director and Secretary of Interior (BLM Manual 8353, Section 1.4 B.3);
5. Coordinate with ONDA and other interested parties to develop cooperative relationships dedicated to education, training, and volunteer trail management efforts (BLM Manual 8353, Section 1.6 C.3);
6. Publish the ODT route on future district and recreation maps, and include the ODT route in Recreation Management plans; and
7. Evaluate and consider the ODT when making future land acquisition, water allocation/development, and travel management planning decisions.

The attached guide and map sets for ODT users will be made available to the public via ONDA's website ([www.onda.org](http://www.onda.org)) and we welcome land management agency cooperation and input in how best to share these resources with the public. ONDA will continually update maps and other trail information with any necessary changes. We would welcome the opportunity to assist land agencies with stewardship projects related to the ODT or promotion of the ODT that would be helpful in raising awareness about the variety of incredible natural treasures found throughout Oregon's high desert.

I hope you will embrace this proposal as a significant opportunity to engage the public in the management of their public lands. I look forward to discussing the proposal with you in the weeks and months ahead and I hope you will not hesitate to contact me to discuss the proposal further.

Sincerely,



Brent Fenty  
Executive Director

Cc:

Sally Jewell, Secretary of the Interior  
Neil Kornze, National BLM Director  
Brendan Cain, BLM Burns District Manager  
Carol Benkosky, BLM Prineville District Manager  
Don Gonzalez, BLM Vale District Manager  
E. Lynn Burkett, BLM Lakeview District Manager  
Deb Salt, BLM National Scenic & Historic Trails Coordinator  
John Kasbohm, Sheldon-Hart Mountain National Antelope Refuge Complex Project Leader  
Tim Bodeen, Malheur National Wildlife Refuge Project Leader  
Carl Rountree, BLM National Landscape Conservation System and Community Programs Director  
Fred Way, Fremont-Winema National Forest Supervisor