

# Appendix C - Summary of Public Scoping Comments for the Andrews Management Unit/Steens Mountain Cooperative Management and Protection Area Postmarked or Delivered by April 15, 2002

## Introduction

A total of 469 different scoping letters were received (this includes an original version of each form letter) and 1,844 copies of various form letters. Each individual scoping letter and one of each form letter were numbered and each comment in each letter was numbered. Then each comment was summarized and included in a comment table that will be used to track how the comment will be addressed in the Resource Management Plan (RMP)/Environmental Impact Statement(EIS). A total of 3,601 comments were identified. The comments were categorized into the following 23 categories: Alternative Choices; Cultural; Development Issues; Fire; Fish/Wildlife/Wild Horses; Geology/Mining/Energy; Lakes/Springs; Lands; Livestock Grazing; Noxious Weeds; Off-Highway Vehicles/Snowmobiles (OHV); Planning and Process Issues; Recreation; Roads/Access; Special Management Areas/Areas of Critical Environmental Concern; Socioeconomics; Special Recreation; Vegetative Ecosystems; Water Quality/Water Quantity; Wilderness/Wilderness Study Areas (WSA); Wild and Scenic Rivers; Soils; and, Other. Less than two percent of the comments (Other) listed in the table were considered beyond the scope of this planning process and will not be addressed in the RMP/EIS.

The following is a bulleted summary of comments listed by category with the exception of the comments categorized as Other, which are not further addressed in this summary.

### Alternative Choices

- There was support for currently proposed Alternatives A, B, C and D.
- Cooperative management and promoting current and historical uses that are sustainable need to be focus of all alternatives.
- An Alternative E (No discretionary commercial use) should be proposed.
- All alternatives should meet the legislative requirements for the CMPA mandated by the Act and other laws and regulations.
- RMP should cover an adequate range of alternatives that are comprehensive and reasonable as required by NEPA.
- Alternatives should balance resource uses and ecological integrity.
- The BLM must evaluate a reasonable range of alternatives in the Draft EIS.
- Alternatives should be considered simply and within the intent of the legislation.
- Alternatives should be framed around the Steens Act Section 102 and meet the objectives of Sections 102 and 111.
- The “no grazing alternative” is not possible within the CMPA based on the Steens Act.
- Socioeconomics must be analyzed in all of the alternatives.

### Cultural

- Interest in protection, preservation and interpretation of cultural resources.
- Cultural Resource sites should be closed to off road vehicles.
- The RMP should consider the Archaeological Resources Protection Act, provide for further inventory of the Planning Area, and protect known and reasonably inferred resources within the area.

### Development Issues (commercial, recreation, signs, trails campgrounds, toilets)

- No development on Steens Mountain and keep everything primitive.
- The BLM should minimize recreational development including new trails and signage.
- Post rules or educational signs only at the entrance and/or down in the low areas.
- Consider another campground on the east side of Steens Mountain in the vicinity of Alvord Playa and Pike Creek.

- Hiking trails in wilderness/WSAs should not be initiated, but existing recognized trails could be maintained in a manner that keeps the path primitive.
- No new fences or other developments should be allowed and existing developments should be removed unless specifically authorized by the establishing legislation.
- No commercial development, no resort or concessionaire, no concrete parking lots, no RV parks and no housing developments.
- Don't pave the road or build a visitors center or anything like that.
- Construct an information booth or kiosk with bathrooms in Frenchglen or somewhere in that area.
- Develop a short walking trail in the Page Springs Campground.
- Develop the Fir Grove trail that was originally proposed in the SEORMP.
- More campgrounds along Fields/Denio Road especially along east face of Steens.
- Focus development on passive recreation, such as hiking and nature study, over destructive activities such as hunting and vehicular recreation.
- No more roads or campgrounds but a pit toilet on top and a few trails might be good (trails into Wildhorse Lake, Kiger, Blitzen and Big Indian and along summit rim).
- Make it very difficult to get permits for habitation or any damaging mining, logging, or drilling.
- A proactive and comprehensive plan to prevent recreational and commercial development except in very limited areas must be included in the RMP.
- Pursue land exchanges and conservation easements; work with landowners to prevent development of lodges, condos, summer homes, etc.
- Trailheads and campgrounds should be designated and constructed with the historic and current equestrian use in mind. Turn-arounds, trailer parking spaces, and camping areas must be designed with stock use and today's large stock trailers in mind.
- Pullout places should be provided along the roads to accommodate day use or camping.
- Please consider developing new campsites away from the mountain and in areas where increased use will not adversely affect the environment.
- Utilize fences to manage lands, designate wilderness.
- Maintenance and development of water developments should continue.
- Any development in the area must comply with the Wilderness Act.
- Any permanent recreational structures should be located outside the wilderness boundary.
- Avoid overdevelopment of trailheads and upgrading of wilderness access roads.
- Some areas within WSAs may warrant minimal developments such as pit toilets, garbage cans, fire rings and appropriate signage.
- Management decisions could include maximum number of designated campsites allowed within a certain distance.

### Fire

- Fire rehabilitation deemed necessary should only be done to prevent ecological degradation.
- RMP must give specific direction on a natural/prescribed burn plan.
- Fire management policies must emphasize grazing as a superior alternative to burning.
- Designated replacement grazing acres must be incorporated into any prescribed fire management plans to minimize economic loss to grazing permittees.
- Wildfires should meet a specified prescription to be allowed to burn especially in Wilderness, WSAs and RNAs.
- Develop fire suppression techniques to reduce damage caused by suppression equipment. Vehicles and equipment should especially be restricted in wilderness, WSAs, ACECs/RNAs.
- Burned areas must be rested from livestock grazing and other activities for at least ten years following a fire.
- Prescribed fires, especially in Wilderness, WSAs, and RNAs, should only be done when fire ecology is better understood.
- Fire/fuels management must continue.
- The RMP/EIS must address how the rehabilitation plans will deal with cheatgrass invasions.
- The RMP/EIS must be explicit in the criteria to be used to decide when and where prescribed fire will be used.
- Construct the policy for fire rehabilitation with regard to critical wildlife habitats.
- Prescribed burning should occur in the summer, when wildfires normally occur.

Fish/Wildlife/Wild Horses

- Leave wild horses alone, maintain herds, manage them in a sustainable manner through capture and adoption, keep them off grazing allotments, address wild horse herd management in the RMP and adhere to the 1971 Wild and Free Roaming Horse and Burro Act.
- No dams, protect the native trout and address fisheries management issues concerning the trout preserve.
- Areas containing redband trout should be catch and release.
- Biodiversity should be the first management concern and inventories and monitoring should be conducted.
- Animal damage control activities should be held to the same restrictions as other activities in Wilderness, WSAs and in ACECs.
- The no livestock grazing area should remain open to wild horses.
- Consider expanding South Steens HMA to include Fish Creek/Big Indian Allotment.
- Wildlife management requires cooperation with private property owners.
- Predator control program must continue.
- When dealing with Special Management Areas (SMAs), USDA WS will use the preferred method of choice (aerial hunting) for coyotes, which in most cases is the least intrusive to these sites.
- Wildlife habitat must be managed in a method consistent with livestock grazing and production of forage for wild and domestic ungulates.
- No predator control is the greatest threat to sage grouse populations.
- The option to protect game or threatened and endangered species from predation as well as address wildlife threats to human health and safety should be present in the plan as well.
- The RMP/EIS should include measures to improve the likelihood of persistence of sage grouse and other species dependent on sagebrush and rangeland habitats.
- The draft plan should clearly state how it will adhere to “Greater Sage-Grouse and Sagebrush-Steppe Ecosystems Management Guidelines” (2000).
- The RMP/EIS should comply fully with the BLM National Policy on Special Status Species (BLM 6840 Manual).
- It is critical that the RMP/EIS incorporate recently adopted sage grouse guidelines that were developed by the Western Association of Fish and Wildlife Agencies and published in the *Wildlife Society Bulletin* (28:967-985).
- Important parameters such as grass residues for sage grouse nesting cover must be addressed and the BLM must make some hard and needed changes to improve the sage grouse’s plight.
- Special status species on the Andrews RA should be covered under the RMP so that their priority habitats are clearly identified and management standards and guidelines are adopted.
- The RMP should specify that transplanting to or removing game from wilderness should not entail the use of motorized equipment.
- In Wilderness, the RMP should not allow manipulation of native wildlife populations for purposes of artificially augmenting hunting or fishing opportunities.
- The mainstem Donner und Blitzen and its tributaries should be limited to catch and release, barbless flies and lures only.
- If the redbands are going to be protected and the resource improved, people should not be allowed to fish with bait or kill redbands.
- If anglers want to kill and eat fish, that should be limited to the lakes in the area.
- The weir at Page Springs should be removed or altered for better fish passage.
- There is room for habitat improvement on the stretch of river below Page Springs to Krumbo Reservoir.

Geology/Mining/Energy

- Prohibit all mining and geothermal exploration or development and prohibit all oil and gas development.
- Leave the 1872 mining law alone.
- Since 900,000 acres of the planning area have been withdrawn from mineral production, emphasis on development of mineral resources must be a priority for the remaining acres.
- Address potential development by geothermal power within the resource boundary.
- Energy and Mineral lands may be necessary in the near future and should be considered.

### Lands (private, exchanges, easements)

- Address Native American lands, private property and mineral rights and property sales.
- Discourage the development of private land and secure private property to consolidate federal lands through exchange, sale or donation of remote, non-contiguous or land-locked holdings.
- Specific concerns about private parcels and how private landowners will be affected (see Scoping Table).
- Concerned that if the public is restricted from recreating on public land they may be forced onto private land and then private landowners will restrict access to their lands.
- Transfer private lands out of “Fork Big Trout Creek” valley.
- McClains cabin area and Reschene Spring should be transferred to BLM to block up area with proposed wilderness area.
- Transfer Denio Basin private land out to become public land.
- Private lands and realty should remain in place or traded for equal value. Public lands do not support the economy of Harney County. Private businesses do.
- The private lands in the wilderness earmarked to be acquired and exchanged, should be acquired. and exchanged.
- Protection of private lands should be a priority.
- Private property rights should be recognized in the RMP and the interrelationship with BLM lands should be addressed.

### Livestock Grazing

- No grazing on the mountain.
- AMPs need to be re-assessed from an ecosystem viewpoint.
- BLM should identify and close all grazing allotments in the Andrews RA, that are not suitable for grazing.
- BLM should identify special management areas that would allow for closure of allotments where a grazing permit is voluntarily relinquished.
- Assess conflict between livestock grazing and wildlife forage.
- Please keep cattle off sensitive areas subject to harm by grazing.
- Phase out all grazing in all wilderness and WSAs asap.
- No new areas should be opened for grazing.
- I would like to continue the grazing rotation system that we are using in the riparian area of Riddle Creek and Coyote Creek. It has improved the area in the last ten years.
- Why isn't livestock grazing an “issue”?
- Address whether livestock grazing should be used as a tool to mitigate and/or to abate potential wildfire.
- Please use the grazing standards used in the conservation ranches in New Mexico where cows are moved very often and have their own water holes.
- Soil stability and impact on native vegetation and Redband trout should be crucial factors when considering grazing management issues.
- The BLM should provide for automatic plan amendments (decided under a categorical exclusion [no need for supplementary NEPA]) to define grazing allotments as unsuitable if a permittee participates in a permit buyout deal with a conservation group or other agency that wishes to permanently retire an allotment from grazing.
- The RMP/EIS must address how individual grazing allotment plans will be incorporated into the overall plan.
- Stocking rates of all herbivores must be addressed.
- During the Scoping Process, the “Big Field” in the Riddle Ranch, Inc. allotment was divided in half length-wise, the line running north and south. If ever this line is fenced, there is no livestock water in the east half.
- In a land trade, a third party's grazing permit should not have been deeded to another without his/her permission. In cases where this has happened and cannot be revoked, the permittee losing the permit should be given equal AUMs elsewhere.
- The area of Riddle and Coyote Creeks are included in the CMPA with the line even going through the middle of one field. All of this area plus the connecting land are in one permit of one ranch. The entire permit in the Three Rivers District is presently under a management plan that is showing improvement and its rotation system is successful, therefore, the entire permit should continue to be managed under the plan in place.
- Riparian and wetland areas should be grazed. Grazing is necessary for wildlife management.
- I suggest you consider allowing a rancher to graze buffalo within the “No Livestock Grazing Area”.
- Cows should only be grazing on lands that receive more than 12 inches of precipitation per year.
- It would be helpful to publish pasture use dates once a month in the local newspaper.

- I would like to see the BLM print individual maps and construct large map bulletin boards showing allotment and pasture boundaries and the authorized grazing dates.
- The grazing season in the desert pasture in the Pueblo-Lone Mountain allotment and areas north, Mahogany point and Fields Basin, need to be shortened. The season of use should end September 1 or mid August.
- The Pueblo-Lone Mountain allotment three year re-evaluation that was to have been started at the end of the 1998 grazing season needs to happen.
- The Andrews/Steens Resource Management Plan needs to recognize the need to protect livestock that legally graze on or adjacent to legal federal grazing allotments.
- I am a firm believer in striking a balance between ranching and protecting the environment.
- Set up a process to reassess livestock grazing and permit it only as it supports the restoration of ecosystem health as part of an ecosystem management plan.
- The BLM must stop permitting the grazing of livestock where riparian habitats are no longer functioning at their full capacity, where grazing is causing or contributing to violations of water quality standards, where grazing is damaging soil health and where grazing is degrading or prohibiting recovery of microbiotic crusts.
- We recommend that information and data on range condition and frequency of allotment evaluations be tabulated and displayed for easy review by the public.
- Clear data on range condition should be compiled and listed so that information on the category (I, M, or C) is listed along with the dates and results of all allotment inspections.
- Livestock grazing will be allowed only where it has been found to be suitable and the lands chiefly valuable for livestock grazing.
- Ranching interests depending on the land in the area must be allowed to continue to use the lands as they have in the past unless they choose to change.
- Whenever adequate monitoring is not carried out, or evaluation of the monitoring cannot take place within a year of data collection, then livestock grazing must be immediately terminated pending completion of monitoring and evaluation.
- Livestock grazing shall be terminated or otherwise reduced unless it can be shown that grazing does not cause or contribute to the spread of invasive weeds.
- Livestock grazing shall be terminated or otherwise reduced unless it can be shown that grazing does not cause the destruction of microbiotic crust or retard the restoration of microbiotic crust.
- All temporary non-renewable permits shall be permanently withdrawn.
- The Oregon Farm Bureau would support only a plan that allows livestock grazing to continue on the area as it was prior to the creation of the CMPA.
- The BLM must assemble the information to understand the impacts of grazing and present and analyze that information in the RMP/EIS.
- BLM should allow for the voluntary relinquishment of a grazing permit for conservation.
- The BLM must consider whether an allotment is meeting the Standards and Guidelines.
- The BLM must address grazing suitability at the RMP level.
- Please ensure the RMP/EIS discloses adequate criteria for the BLM's assessment of acres suitable for livestock grazing.
- Promotion of viable and sustainable grazing is one purpose of the Steens Act.

#### Lakes/Springs

- No camping at Wildhorse Lake or at Mickey Hot Springs.
- Improve Mann Lake and protect Borax Lake and Springs.
- Install outhouses at Frog Spring.

#### Noxious Weeds

- BLM should engage in an aggressive policy of weed eradication using chemical, grazing and biological techniques.
- Perhaps the noxious weeds could be eradicated by benefit of companion planting which would thereby eliminate them without the utilization of harmful chemical intervention.
- Tell people to quit bringing them in. Catch the people who are bringing them in.
- Noxious weeds must be controlled by burning or spraying.
- The BLM must comply with the Executive Order on Invasive Species.

### OHV/Snowmobiles

- Eliminate winter motorized use (snowmobiles) on Steens.
- Eliminate snowmobile use access to the Steens.
- Snowmobiles should not be allowed in wilderness or WSAs.
- Eliminate ATV travel on all roads except maybe the Loop Road.
- Assess ORV designations and limit use throughout the Andrews RA.
- I strongly support the designation of snowmobile play areas within the WSAs on the Steens consistent with historical use before the Act.
- No snowmobiles at Fish Lake.
- Off-road vehicle use should be banned in all existing Wilderness Study Areas (WSAs) and trails where such use conflicts with other resource values.
- I request that off road vehicles be restricted to designated roads.
- OHV and snowmobiles are the perfect way for AMERICANS to visit OUR public lands.
- Regulate and monitor ORV use in non-wilderness areas.
- Whenever ORV's are discussed, the OHV strategy is referred to as guidance. While it is indeed a handbook for BLM staff use, appropriate laws, regulations and executive orders are the ones that establish criteria that will hold up in courts.
- OHV use should be classified as limited or closed in the Steens area covered by the Act. Limit OHV use to recognized routes and in some places seasonal restrictions should be applied to reduce or eliminate damage to roads - to the same for the Pueblos and Trout Creek Mountains. Close the main Trout Creek loop road in the winter along with most of higher elevation routes in the Pueblos. Close OHV use in RNAs and Wilderness. There could be some open areas like in the Catlow Valley. An analysis or research should be conducted to determine the legality of allowing OHV use to occur in the Alvord Playa.
- Areas that have been open to snowmobiles should remain as such as long as they stay over the roads.
- When discussing ORV designations, the Preplan says that the CMPA outside the Wilderness will be "limited to existing roads" but Sec. 112(b)(1)[B] of the Steens legislation requires 'designation' of any roads that are to be used in the transportation plan. Designated vs. existing is an important distinction.
- You can limit access of snowmobiles to the areas least likely to be damaged or destroyed by them.
- I am very concerned about BLM's interpretation of the Steens Mountain Act as to the use of snowmobiles within the management area.
- I am asking that BLM work with all the snowmobilers of Oregon and develop a sound plan that will allow us to have trail and play areas and to be able to continue to enjoy our sport in the Steens Mountain.
- As part of a recreation plan, BLM should evaluate designating trails for motorized use both summer and winter. BLM should fully evaluate designating a trail area for a snowmobile play area.
- The Alvord Desert WSA was not grandfathered in by FLPMA as an open dune and Burns BLM has been in violation of regulations by allowing open use. This RMP is the appropriate place to correct this error.
- The RMP/EIS must address an adequate range of alternatives with respect to OHV use; must manage OHVs pursuant to FLPMA's principles of multiple use and in accordance with FLPMA's requirement to prevent unnecessary and undue degradation of the public lands; and must conform to Executive Orders 11644, 11989, the BLM's "National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands," and the BLM's OHV regulations.
- Areas open to OHV use must minimize harassment of wildlife and disruption of wildlife habitats and minimize conflicts with other recreational users of the public lands.
- The BLM must present inventories and evaluations of the effects of OHVs in ecosystems and specific ecosystem components such as soils, microbiotic crusts, fish and wildlife and their habitat, native vegetation, and the spread of weeds. Unless and until the BLM provides this information, the public lands should be closed to OHV use unless specifically designated as open.
- OHV use must be allowed for managing allotments and public lands.
- SMAs should be closed to OHVs.
- OHV use should not be restricted outside of CMPA unless monitoring indicates permanent damage from use.

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Planning Process Issues (RMP/EIS, Scoping)

- In the scoping meetings explain many features that are unique in the Steens Act.
- Information was received too late to avail the use of public meeting dates.
- The amount of information provided and the willingness of the representatives to answer my questions at the scoping meeting was impressive. The graphic presentations and maps at the scoping meeting were very well done.
- I urge you to welcome constructive public involvement in any form. Use the comments to demonstrate that this area is of national interest, and to support BLM's best efforts to fully protect the wilderness character and native ecosystems of the Steens area.
- Each letter is unique as it is sent from a different person, please treat each letter individually and do not diminish the voice of the public.
- We support this open process of comment and review.
- Plan should be comprehensive and written to be understood by a lay person.
- The Andrews Management Plan and Steens Management Plan should be separate.
- The RMP should be site specific and not include the SEORMP or ICBEMP.
- The comment process should be extended until June.
- Intent of the Steens Act is to emphasize Cooperative Management. Purposes 1, 5, 10, 11, 12, and 13 of Section 1(b) of the Steens Act should guide the process.
- Baseline data must be collected.
- The Proposed SEORMP says that the comments received when the Andrews RA was included in the SEORMP process would be used in the RMP for Andrews.
- I recommend reviewing the Protest filed by ONDA, et. Al., on the PSEORMP to see the way in which the environmental community might react to proposals put forth within this RMP.
- There are fewer and fewer places left in Oregon that have not been destroyed by improper use and over-use. It is late in the game, but it is time to call a halt to the abuse of public lands. We must learn to live with nature, not try to mold it for our short-term profits. We plead with you to include these concepts into the planning process.
- Item 9 on page 13 [Preplan] says the Science Advisory Committee will be established, but the legislation seems less conclusive on whether one is mandatory.
- BLM is contending that it cannot meet the legislated deadline for completing the Andrews RMP if it were to try to analyze limiting recreational and ORV use and to assess AMPs. Given the importance of these issues however, BLM needs either to hire consultants or establish a schedule for handling them through separate EISs to be completed after the LUP.
- Address issues 4 [wildlife habitat], 6 [energy and minerals], 9 [recreation management], 10 [lands and realty], and 14 [OHV management].
- You are the trustee of a very special place belonging to all American citizens. Please ensure that the interests of all citizens of this country are recognized in development of the RMP.
- Monitoring must be conducted.
- Effectiveness monitoring and evaluation should be integrated with land use and implementation plans to establish thresholds for various resource parameters that have been identified as triggers or indicators that a new decision is required. We recommend that this process, which provides an objective, science-based means of determining whether a new plan decision is required, should be used in the Andrews/Steens RMP.
- It is important that plans be current and address pressing issues such as fire rehabilitation and conservation of sage steppe habitats. It also is important that plans be based on the direction provided by the Interior Columbia Basin Management Project (ICBEMP) as well as the latest federal laws, regulations, standards, guidelines, and policies.
- Management under the new RMP should be conducted as an experiment so that ten years from now we will have learned as much as possible about the effects of our land management activities.
- We believe the BLM must plan for long-term stewardship responsibilities that do not permit an irreplaceable or irretrievable loss of resources.
- Much of the CMPA boundary was drawn on section and township lines. In several places this isn't compatible with the topography, permits, and/or existing fences.
- We ask that the RMP clearly reiterate the clear intent of Section 121, which is that the Secretary may enter into cooperative management agreements with local interests only if doing so is appropriate to achieving resource or land use management objectives.
- The RMP/EIS must provide meaningful objective, numerical standards for management of rangelands and their associated vegetative and soil resources. NEPA requires that resource management plans inform the public and decision makers how the resources will be managed in the future.

- There has been considerable controversy over the “cooperative management” language in the Steens Act. We request that the RMP address this language straight-on so as to clarify any confusion regarding how it will affect management of the CMPA and wilderness.
- The High Desert Committee would like the Burns BLM to keep in mind that the time line mandated in the Act for the CMPA does not apply to the Andrews MU. We understand combining these plans, however, we do not want important aspects of the land use planning process to be inadequately addressed as a result. The Andrews MU can be pulled out and dealt with separately, contractors can be hired to provide more assistance, or parts of the process can be mandated to be dealt with by separate EISs within a specific period after the RMP is completed.
- True standards having a definite timeline shall be incorporated.
- In order to fulfill NEPA and FLPMA directives, the BLM must consider and give credence to the overall goal of landscape level health and properly functioning ecosystems.
- Adaptive management requires that well developed and statistically valid monitoring programs be in place to identify the positive and negative effects of management.
- We urge the RMP to adopt the following analysis of what the Act meant by establishing the potential for cooperative agreements: all cooperative agreements with any party must still be governed by existing law, policy and regulation; it is common policy across the federal land management agencies to reach out cooperatively to local communities and interests when formulating management direction.

#### Recreation (hiking, birdwatching, camping, hunting)

- Limit recreational use to protect solitude.
- Work with the State of Oregon Wildlife folks to reduce hunting permits issued on the Steens.
- The existing wildlife populations must be of paramount concern for recreation management.
- BLM should consider limiting party size and perhaps imposing quotas on permits for especially sensitive areas.
- The ad hoc campground across the road from the Alvord Hot Springs has to be prevented.
- Camping etiquette should be a priority.
- The best use of the vast majority of the lands is for dispersed recreation.
- Install a horse unloading facility near the Little Blitzen trail head on the north side of the Loop Road to reduce horse and traffic conflicts.
- Monitor dispersed camping in sensitive areas for signs of high/negative impact and regulate if necessary.
- Design new facilities for management (not promotion) of recreation.
- Overnight camping at Wildhorse and Little Wildhorse Lake should not be allowed.
- I support winter recreation on Steens Mountain. I think opportunities should be expanded to provide public access to use public land near or on both the North and South Loop Roads and I support the designation of trails within the CMPA for year-round motorized use.
- Encourage and promote primitive recreation and the enjoyment of the areas scenery and solitude.
- Recreation management plans must emphasize public access, maintenance of public roads and trails, including RS2477 public roads.
- Establish a recreation use carrying capacity especially in Wilderness and ACECs.
- Please keep the Steens open to horse and equestrian use. Don't close the horse camp.
- Address signage and trailhead parking areas for Pueblo Mountains area and Trout Creek Mountains area.
- Recreational sites can be defined in the RMP as something quite different from Wilderness and should be described to eliminate those activities which undermine those natural and primitive qualities provided by wilderness experience.
- No horse or pack animals should be allowed in the Wildhorse/Little Wildhorse Canyons.
- The plan should establish group size limits that apply equally to private visitors and commercial outfitters.
- BLM should fully engage in a recreational plan for the CMPA as part of the RMP/EIS.
- Regulations should not reduce the number of recreational stock use days below approximate levels existing at the time the Steens Mountain Wilderness was designated.
- If total use is allowed to increase beyond that which existed at the time of classification as Wilderness, recreational stock use should be allowed to increase at a proportionate rate to which existed at the time of classification.
- I am interested in your treatment of the Donner und Blitzen River in your RMP. With all the other wonderful things the Steens are, it is also an excellent whitewater experience for the few who run it.

- We presume then, that provisions in the 1964 Act recognizing the public purposes of “recreational, scenic, scientific, educational, conservation, and historical uses,” and the mandate to preserve the character and conditions that existed at the time the area was included in the National Wilderness Preservation System, will apply to recreational stock use and grazing will be allowed and managed, as a component of total use, as necessary to achieve that mandate.
- Proposed regulations that further restrict recreational or historical use must be based on verifiable evidence that such use is resulting in a deterioration of wilderness character and conditions.
- It is critical that current baseline data be collected and added to that which is already available.
- Camping should be restricted to sites designated with fire rings.
- If a maximum party size is determined to be necessary, in consideration of the use that has occurred in the Steens in the past, we suggest that it be set at a relatively high level. We recommend a standard similar to the USFS Region 5 maximum party size in their larger northern wilderness areas, 25 people without consideration for animals to start with.
- The BLM needs to consider how to keep people on developed trails around popular overlooks such as Kiger Gorge.
- I am concerned about the future of recreation on the Steens Mountain. I am very concerned about BLM’s interpretation of the Steens Mountain Act as to the use of snowmobiles within the management area.
- We are very concerned that agency administrators will react to pressure from extremist elements of the Wilderness community and impose unnecessarily restrictive limits or regulations based on their perceptions of recreational impact or their personal values and preferences.
- We insist that the following statement (which should have been included in the Act of 2000) is included in the Management Plan: “Traditional recreation saddle and pack stock use is an appropriate, current, and historical use of the Steens Mountain Wilderness.”
- It would be premature to propose limits on recreation use until a baseline inventory of existing conditions is completed and monitored for an adequate period to determine if recreation use is resulting in unacceptable levels of impact.
- Neither the Wilderness Act nor the Steens Act mandate improvement of the condition in the designated Wilderness area to a higher standard than existed at the time the Wilderness was created. Both, however, require that traditional forms of recreation be preserved.
- Broken Trails would like the BLM to maintain quality recreation opportunities in the Andrews Resource Area for individuals as well as commercially guided groups.
- I strongly support the designation of trails and play areas within the management area including the WSAs. I believe this would be consistent with the historic trails and play areas historically used before the Act was passed.
- The BLM needs to curb illegal recreating use, guided or otherwise.
- I do not want my uses on public lands, motorized and non motorized, to be restricted, or if restricted to be no more than is actually necessary within the spirit and intent of the Act.
- The BLM needs to avoid “parklike” management practices, i.e. designated campsites, toll fees, BLM ranger guided tours for a fee.
- Non-motorized recreational use should be allowed on the loop road.
- We believe you will need a permit system for camping and overnight use to encourage registering, control numbers and to provide information on user ethics.
- Campfires are a difficult issue and should be decided based on the resource (is there enough wood, what is the fire danger). We are in favor of requiring camp stoves.
- Include a provision that camping areas and trails may have closures when the resource is impacted beyond acceptable levels.
- Hunting, fishing and recreation are historic use and should be continued.

#### Roads/Access

- Eliminating roads due to inaccurate classifications as “ways” is bureaucratic manipulation.
- The BLM should make a seasonal closure on the Moon Hill road from the end of elk season to the middle of March as goose hunters and snowmobilers tear up the road to where it is impassible.
- Vehicle use should be limited to established roads.
- Close all the cherry stems in the Wilderness to as part of the Transportation Plan.
- No new roads should ever be built on that mountain.
- Allow reasonable access for inholders and ranchers, but only that minimally necessary under the Wilderness Act and establishing legislation.
- Maintaining access to recreating areas and private property is essential in the management plan.

- Please restrict motorized use to designated roads and close all trails where conflicts with other resource values exist.
- Address land use and public access.
- Maintain motorized access as currently regulated.
- As a handicapped senior citizen, the only way I'm able to enjoy and visit the Steens area is by motorized transportation. I would like this area to be kept open for motorized use on existing trails and roads.
- Address closure of "ways" to vehicular traffic to limit the spread of noxious weeds.
- I would like to see the north and south loop roads designated for winter trails and some play areas for hill climbing.
- Please leave unroaded areas road- and vehicle-free.
- I would encourage another look at the application of your agency's definitions for what a road is and what a "way" is. Seems to me that there are many roads (now) defined as "ways". Obviously this by itself has substantial "restrictive" impacts.
- All the jeep roads should be closed except to nonmotorized transportation.
- Establish the roads for other vehicles outside the Wilderness area.
- Do not pave the Loop road.
- We would like to see the South Loop Road in the vicinity of the Rooster Comb section to remain rough or better yet, closed and rehabilitated.
- Close Arizona Creek Road from east WSA boundary to Stergen Meadows.
- I would like to see more access for hiking and birdwatching on the eastern side of the Steens, can some public easement be worked out to provide access for hikers and climbers to access high eastside basins. I oppose ORV access and am only talking about pedestrian access.
- I do not want my uses on public lands (motorized and non-motorized) to be restricted, or more restricted than is actually necessary within the spirit and intent of the Act.
- You should encourage the building of trails with good signs while reducing areas accessible to vehicles.
- I would like to be able to drive anywhere that is needed on my grazing permit. So I can fix fence, repair reservoirs, scatter salt or do whatever is needed.
- The BLM now sanctions some motor vehicle use in the Wilderness allowing an outfitter motorized access to leased land within the Wilderness and for a realtor to drive clients to a parcel of private land also within the Wilderness. This type of motor vehicle access must be denied.
- Decisions on access to private inholdings should be evaluated on a case-by-case basis with opportunities for public comment. Past modes of transportation should not be used as the main criteria for determining access. Instead, foot and horseback access should receive priority consideration to protect the area's wilderness values.
- I would like to see part of the Alvord Desert be closed to motor vehicles.
- One mile of open road per six square miles of land is acceptable for both hunting and wildlife enjoyment.
- Take hunter access into account when you are closing roads (for those who do not have horses or ATVs).
- Continue to close Loop road in winter.
- Allow vehicle travel only on roads that are posted open.
- Administrative use of motorized vehicles should be addressed in Wilderness, WSAs, and RNAs. While certain administrative use is permitted, it should not be just for convenience. Hiking or horseback activity should be a rule for administrative use with only rare exceptions permitted.
- The industries that create all new wealth and harvest resources ... must be allowed access and use of the land.
- The Steens Mountain CMP Act guarantees landowners reasonable access to their private lands with the CMPA including lands and interest therein within the Wilderness. Since the private lands within the CMPA were homesteaded, landowners have had the right to free, unrestricted and unfettered access to their lands. According to PL 106-399, BLM cannot make any decision which affects these rights to real property. Any attempt to change the private landowner's, and interests therein, current and historic access would be a violation of at least four different parts of the Steens Mountain CMP Act.
- We recommend the BLM complete a road and trail atlas (inventory) and a transportation plan for the Andrews/Steens planning area.
- As part of the winter recreation planning, BLM should evaluate ways in which more of the public lands can be accessible for all public use.
- The Transportation Plan and the final decisions on open and closed roads are very important to current and historic recreational and other public use is protected including dispersed use camping areas, pull-outs and other areas of use which may not be considered within the boundaries of a "road".
- BLM will have to identify and allow for at least the minimum road maintenance required to ensure the agency meets its obligation of allowing access to both private and public lands.

- Please consider limiting access to roads that can be maintained and that access to unique and sensitive habitats such as wetlands and riparian areas be limited.
- Access should be controlled by permit to assure that the wilderness experience is maintained.
- End motorized access of inholdings.
- Transportation plan may find it necessary to bus more and more people to the high Steens and other popular areas, as visitor numbers increase.
- All minor roads, unnecessary for BLM management, should be closed.
- Assess the desirable practicality of leaving existing roads and ways open as cherry stemmed access ways for the motorized recreationist.
- We are not happy with restricting access within the management area.
- Regarding access to private property, landowners need the security of permanent general easements that remain intact even with land ownership changes. Easement location should be economical for the private landowner to create or maintain. Access by permit would be a constant concern to the landowner, as permits can be challenged and/or eliminated.
- Close/block access to jeep tracks and post open roads to inform people that unless posted as open, any road/track is closed to vehicle use.
- Carefully control motorized access to private inholdings so as to minimize disturbance to wildlife, fragile alpine vegetation, scenic vistas and the quiet enjoyment of this wonderful mountain environment.
- Any ways that have deteriorated from non-use to the extent no longer easily visible, should specifically be excluded from use by anyone working in WSAs.
- The RMP should identify the size and location of all state and private inholdings within the Steens Mountain Wilderness and specifically stipulate that individual special use permits will be required for any proposed motorized access to inholdings, as required by 43 CFR part 2920 regulations. The RMP should also state that special use permits will be evaluated within a NEPA process and the RMP should reiterate the three criteria for determining access to inholdings as described in national BLM regulations (43 CFR Part 6305).
- During winter the loop road should be closed to all motorized use.
- We ask that the RMP confirm, as an important statement of policy, that a special use permit will be required for each livestock permittee requesting motorized access into the wilderness. The RMP should specify that the special use permitting process must include a site-specific minimum requirement and tool analysis using the Carhart model.
- Trailhead parking areas should be kept to a fairly small size to discourage future crowding and loss of wilderness solitude.
- The Transportation Plan should be the second priority in planning after economics.
- Law enforcement must be addressed in the Transportation Plan.
- Access should be provided unless substantial impairment or damage occurs.
- It is not consistent with the Steens Act to require permits to access inholdings within the wilderness, plan should utilize notice of reasonable and normal access.
- Designate roads as private property access roads.

#### SMAs/ACECs

- Establish more RNAs for native plant communities.
- Each native plant association/community type should be represented in more than one RNA
- What does this do to the rights of landowners. Who manages the area? How is the management paid for?
- An inventory of the lands within the Andrews Resource Area should be undertaken to identify "areas of critical environmental concern in accordance with 43 USC 1711(a).
- A new plan for the Andrews RA should give priority to areas of critical environmental concern.
- In ACECs/RNAs a recommended goal where unique plants, wildlife or scenic attributes are involved could read, "Activities are allowed that enhance the values that made the area unique."

#### Socioeconomics

- Steens Mountain's greatest economic value is as a destination for tourists.
- Concern about maintaining the economic base of local communities as is required of federal land management agencies under the federal code of regulations and various federal statutes.
- Riparian and wetland areas must be managed for production of forage for domestic wildlife woodland management resulting in a sustained output of goods and services that can be captured by local communities, recreation, mining and off-road vehicle use.

- Socioeconomic considerations must emphasize sustainable local communities. Emphasis must be management alternatives selected to sustain, maintain and enhance commercial, value added and job creating opportunities.
- The needs of the local citizens must take priority over all other interests.
- If WS wildlife management activity is reduced in magnitude or not allowed at all, there would be an adverse effect on the local rural economy.
- The draft RMP/EIS should focus closely on the economic needs, both current and future, of Harney County and its residents.
- Every effort should be made to protect the natural resource economies of the communities which will be potentially affected by the management of the Andrews/Steens Planning Area.
- Consider economic feasibility and impacts throughout the RMP.
- The number one issue should be the economic health of Harney County.

#### Special Recreation (SRPs, outfitters, running camp)

- Establish a good base line of data before issuing any new permits.
- Consider repercussions of permitting entities that have been illegally outfitting for years.
- Permitted outfitters should be allowed at present levels providing they are also included with any equation used to establish carrying capacity.
- The summer running camp Big Indian should be discontinued or be subject to any group limitations and should be off limits in RNAs.
- Limits of Acceptable Change might be a good management avenue to figure out use and activity, especially in Wilderness/WSAs.
- Any group that the agency plans to permit needs to be licensed in the state of Oregon as a guide.

#### Vegetative Ecosystems (upland, woodland, riparian)

- Emphasize conservation of biological diversity, ecological processes, plant community restoration.
- Management actions should not keep or place plant communities (seral stages) outside the range of natural variation, or further degrade them.
- BLM doesn't have the money or time to manage resources to improve and maintain the integrity of upland or riparian ecological communities.
- Woodland management should emphasize juniper eradication, with strong emphasis on the capture of fish, fuel wood and primary forest products utilization. Reforestation and afforestation should also be emphasized.
- No vegetation manipulation in Wilderness or WSAs.
- Need to manage high desert vegetation now, before noxious weeds replace distinctive flora.
- The key objective of the RMP/EIS should be maintenance of the sagebrush steppe ecosystem so that important ecosystem functions continue.
- The bottom line of the RMP/EIS should be to ensure that soil stability, watershed health, and ground cover all are within ranges that promote sound ecosystem function.
- The RMP/EIS should consider providing greater emphasis on restoring rangeland habitat.
- Rangelands should only be replanted with native species.
- All rangelands in poor or fair condition should be withdrawn from livestock grazing until they have developed an adequate herbaceous layer and a healthy microbiotic crust.
- All rangelands in excellent condition should be permanently withdrawn from livestock grazing to allow baseline conditions to be studied and to act as a genetic reservoir of native species that are necessary for future reintroductions into degraded rangelands of the region.
- Provide whatever evidence and data that pertains to the causes of unsatisfactory range condition.
- The plan needs to assure that the BLM can continue the effort to manage western juniper over the whole management area, including the Steens CMPA.
- The RMP/EIS must provide objective and numerical standards for management of rangelands and their associated vegetative and soil resources.
- Vegetation management must address ongoing scientific studies.
- Riparian and wetland areas must be managed as dynamic communities.
- Juniper must be controlled.

Water Quality/Water Quantity

- Maintain water sources, protect and restore watersheds, save streams and limit fishing and boating.
- It is imperative that the use of water resources be fairly apportioned in ways that sustain economic values that can be captured by individuals holding valid water rights and grazing permits, and for other uses, including mining and recreation.
- Eliminate grazing from entire planning area, WSAs and adjoining areas in the contiguous ecosystem to improve water quality and riparian habitat.
- Develop a management plan that would prevent pollution of the water or erosion of the banks.
- Do not allow development, grazing or camping near the streams.
- The water taken from Dip Creek could be replaced by the present well on Rincon Flat or by a newly drilled well.
- Taking water via pipeline from any riparian area should not be a part of any BLM projects.
- A comprehensive program of annual water quality monitoring for all major waterways and their tributaries should be implemented immediately including actions to reverse, and then restore water quality through the resource area. BLM should abandon the pipeline taking water from Dip Springs (Pueblo Mountains).
- We recommend setbacks from water for tethered animals, but free roaming animals should not be restricted except around springs.
- We recommend that springs/seeps outside the “No Grazing” designation be fenced with stock water available outside the fence.
- Water developments should be required to function during the hot summer and early fall months after removal of livestock.
- To improve the historic riparian area at Dip Creek, I would propose that the South Rincon reseeding well (identified on the enclosed map) be redeveloped. Another option would be drilling a new well to supply the existing tank and pipeline. The BLM should take over maintenance responsibilities at the Rincon seedings water system.
- Water quality, aquatic resources and fisheries should be managed with common sense with all affected parties involved.
- I urge you to consider accelerating your water development efforts on the lands you manage.
- The draft RMP/EIS must provide for compliance with water quality standards by providing for objective standards with definite triggers and responses to water quality problems. TMDLs should be developed to insure water quality is improved and impaired waters de-listed.
- The draft RMP/EIS should avoid issuance of grazing permits for grazing allotments adjacent to water quality limited streams.
- We urge the Burns BLM District to make the production of high quality water a very high priority.
- The draft RMP/EIS should acknowledge that the primary cause of water quality degradation on the public lands is pollution from nonpoint sources.
- To meet standards and guidelines as well as to avoid violations of the CWA, the plan should include a specific, immediate promise to address water quality standards violations.
- Cooperative riparian management should be addressed.
- Water quality should be addressed in the plan only to the extent that it is authorized by the state.

Wilderness/WSAs

- Steens Mountain should be managed for its primitive and natural conditions through strong enforcement of the Wilderness Act.
- The wilderness and the rest of Steens Mountain should receive a high level of protection.
- The [Wilderness] Act must take precedence over the extremely broad interpretation of the “cooperative and historical” language in the Steens Mountain agreement that interest groups are attempting to impose.
- The BLM should re-inventory wildlands not designated as WSAs for wilderness suitability.
- BLM needs to survey all lands outside WSAs for suitability for wilderness designation, especially since BLM regulations call for this inventory to be done as part of the LUP process.
- The BLM has its present wilderness regulations that should not be circumvented.
- Trailhead signboards should stress the importance of leave-no-trace camping techniques and educate visitors about the special restrictions that apply to traveling in a Wilderness.
- We recommend that land restoration activities be initiated within WSAs where it is deemed natural characteristics have been compromised, unnatural features in a specific area exist, or where wilderness qualities can be enhanced.

- Manage all WSAs and Wilderness as primitive (as described in the Recreation Opportunity Spectrum (ROS) system.
- Trout Creek Mountains and Pueblo Mountains should be made into wilderness areas.
- Protect other lands within the Andrews RA that have not yet received the official “wilderness” designation - Alvord Desert, Pueblo Mountains and Trout Creek Mountains.
- I am opposed to any plan that creates any more useless-wasted wilderness that no one can visit.
- Campfires in Wilderness/WSAs should be discouraged and if monitoring indicates a problem they may need to be excluded.
- In WSAs, not only does FLPMA section 603 and the subsequent IMP need to be followed, but we would like to see the following goal be included: “The quality of wilderness values and attributes would not be diminished.”
- Some fences were said to be removed should wilderness designation occur as outlined in EAs. If this hasn’t been done it now needs to be initiated.
- In its most primitive definition, the term “Untrammelled” is violated in Wilderness and WSAs when fencing is erected because it adversely restricts “Free movement.” Wilderness is also supposed to be areas of “undeveloped Federal land”, but construction of new fences infringe on this mandate - it does not matter if fences were existing before it was a wilderness because the designation of wilderness constitutes a new and different method of land use administration.
- Steens Mountain Wilderness should be managed for its primitive and natural conditions through strong enforcement of the Wilderness Act.
- Assuming that the tiny orphans [of wilderness] created by the Steens Legislation can not be managed as wilderness they should be dealt with appropriately.
- This RMP must prioritize the wilderness values of these public lands.
- Assuming that all of the land exchanges can be completed, we will end up with a number of new Wilderness units that deserve their place within the Wilderness preservation System. The left-over scraps of “wilderness” created by this legislation need to be re-evaluated.
- Adjacent lands excluded from the WSAs should be inventoried for additional wilderness inclusion, as suitable.
- I would like to see current wilderness preserved and expanded a little over the years into the fish Lake creek drainage and down further into Kiger Gorge.
- The Steens Wilderness is an inappropriate name and misleading name ... as there are either 8 or 9 separate and distinct units. It does harm to the concept of Wilderness for the public to think of Steens Wilderness areas as a single wilderness. In reality, what we are dealing with is a number of wilderness areas separated by roads. It is a travesty for people to continue to speak of “The 175,000 acre Wilderness” created by the Steens Legislation and I hope this practice will end sooner than later.
- Strong and active enforcement of the Wilderness Act from low over flights to keeping an eye on pre-existing mining claims.
- Wilderness quality lands on the Alvord Desert, Pueblo Mountains and Trout Creek Mountains must be designated as WSAs.
- Your new RMP for the Andrews RA (including Steens) must emphasize conservation and protection of wilderness values.
- All land within the RMP not originally inventoried for Wilderness potential during the original review required by FLPMA should be surveyed now (pg. 35 discussion says “could”) and any lands originally surveyed should be reviewed for changes that might have occurred to allow them consideration now. This would seem to be required by the new Land Use Planning Handbook and Manual 1600, and the Wilderness Inventory Handbook H-6310-1.
- Wilderness is not the same as a recreation site.
- I am opposed to any plan to help create more Wilderness in Oregon.
- Future management must not detract from the primitive wilderness experience.
- The BLM should continue to avoid management actions that detract from the primitive wilderness experience.
- Section 2(a) of the Wilderness Act refers to wilderness as a singular entity in its own right when it describes “an enduring resource of wilderness.” The analysis of impacts and the affected environment in the RMP should therefore evaluate impacts to wilderness as a separate resource category.
- The RMP/EIS must adequately protect WSAs from adverse impacts from livestock grazing, off-highway vehicles, and actions on lands adjacent to WSAs.
- We urge the BLM to adopt an alternative in its final RMP that adequately addresses grazing pressures within WSAs.
- We request livestock grazing be suspended in WSAs where monitoring shows a decline in ecological condition.

- We request structures, such as fences and water developments, be prohibited from WSAs.
- OHVs should be prohibited from use within WSAs.
- Provisions for strict compliance with legal mandates for wilderness protection and management should be incorporated into the RMP.
- While the BLM has argued elsewhere that recommended WSAs submitted by the President to Congress in 1991 need not be re-inventoried this assumption runs counter to FLPMA and is particularly erroneous with respect to WSA acreages not so recommended in the 1989 and 1991 documents. The BLM must continue to inventory these lands with respect to their wilderness suitability of those non-recommended areas that may have occurred in the past ten-plus years.
- We also ask that the RMP emphasize that the statutory land use management objective for designated wilderness is the preservation of wilderness character.
- The RMP should adopt a minimum requirement and minimum tool analysis model that will be applied in writing to all administrative actions in wilderness that propose any of the actions prohibited by Section 4(c) of the Wilderness Act.
- The overarching mandate of the 1964 Wilderness Act to land managers is to preserve an area's wilderness character in at least the same quality or better as existed at the time of wilderness designation. We ask that the RMP specifically acknowledge this management mandate to preserve wilderness character in its discussions of topics affecting the Steens Mountain Wilderness and to recognize that wilderness character is comprised of both tangible and intangible qualities which cannot be fully assessed simply by discussing biophysical resources.
- Management methods used in the wilderness should have the least possible impact on recreational users while assuring wilderness values are not impaired.
- Management must be consistent with Steens Act to recognize and allow current and historic recreational use.

#### WSRs

- Recommend waterways eligible for inclusion in the National Wild and Scenic River System.
- All rivers and streams in the planning area should be designated WSR.
- I am opposed to any plan to designate any stream or river as wild & scenic.
- If all rivers cannot be considered for WSR designation at this time, they should be managed as WSR until the studies can be done.
- Please extend WSR protection to all the tributaries and creeks of Kiger, Wildhorse, Fish, Donner and Blitzen Rivers.
- The Wild and Scenic Rivers Act requires that the administering agency must develop a comprehensive management plan for designated river corridors within three years after the date of designation. This means the Wildhorse and Kiger Creeks plan must be completed by October 30, 2003.
- BLM should utilize this opportunity to inventory and recommend streams in the Pueblo and Trout Creek Mountains as well as streams on Steens which have previously gone unconsidered.

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