

Appendix U - Stream Temperature and Turbidity Data

Table U-1. CSNM Stream Temperature¹ Monitoring Sites in Jenny Creek Watershed			
Hydrologic Unit Code²	Site Code	Site Location	Agency/ Organization³
18 01 02 06 03 01	SDAL	Soda Creek above confluence with Grizzly Creek	FOG/BLM
18 01 02 06 03 01	JNYU	Jenny Creek above Johnson Creek	BLM
18 01 02 06 03 03	JNSL	Johnson Creek above Jenny Creek	FOG
18 01 02 06 03 04	JNYM	Jenny Creek above Beaver Creek	BLM ⁴
18 01 02 06 03 04	BVRL	Beaver Creek above Corral Creek	BLM ⁴
18 01 02 06 03 04	CRLI	Corral Creek @ confluence with Beaver Creek	BLM ⁴
18 01 02 06 03 05	KNPS	Keene Creek below Parsnip Springs	FOG/BLM
18 01 02 06 03 05	KNAS	Keene Creek above South Fork Keene Creek	FOG/BLM
18 01 02 06 03 05	KNSF	South Fork Keene Creek @ confluence with Keene Creek	FOG/BLM
18 01 02 06 03 05	MILF	Mill Creek approx. 0.5 mi. above Keene Creek	FOG
18 01 02 06 03 05	LINL	Lincoln Creek above confluence with Keene Creek	BLM
18 01 02 06 03 05	LINF	Lincoln Creek above confluence with Keene Creek	FOG
18 01 02 06 03 05	BXDW	Keene Creek below Lincoln Creek	BLM
18 01 02 06 03 06	BXON	Jenny Creek below Keene Creek	BLM
18 01 02 06 03 06	PARK	Parker Creek above Jenny Creek	BLM
18 01 02 06 03 06	BXO1	Jenny Creek above Oregon Gulch @ Box O Ranch Reach 1	BLM
18 01 02 06 03 06	BXO2	Jenny Creek above Oregon Gulch @ Box O Ranch Reach 2	BLM
18 01 02 06 03 06	BXO3	Jenny Creek above Oregon Gulch @ Box O Ranch Reach 3	BLM
18 01 02 06 03 06	BXO4	Jenny Creek above Oregon Gulch @ Box O Ranch Reach 4	BLM
18 01 02 06 03 06	BXO5	Jenny Creek above Oregon Gulch @ Box O Ranch Reach 5	BLM
18 01 02 06 03 06	BXO6	Jenny Creek above Oregon Gulch @ Box O Ranch Reach 6	BLM
18 01 02 06 03 06	BXO7	Jenny Creek above Oregon Gulch @ Box O Ranch Reach 7	BLM
18 01 02 06 03 06	ORE2	Oregon Gulch @ Box O Ranch west boundary	BLM
18 01 02 06 03 06	OREG	Oregon Gulch above Jenny Creek	BLM
18 01 02 06 03 06	BXOS	Jenny Creek below Oregon Gulch	BLM
18 01 02 06 03 06	LWRX	Jenny Creek below Spring Creek	BLM

1/ Stream temperatures monitored with data loggers.

2/ See Table 2-7.

3/ BLM = Bureau of Land Management, Medford District; FOG = Friends of the Greensprings.

4/ 1999 temperature data was collected by FOG.

Table U-2. CSNM Summer Stream Temperature Monitoring Data for Jenny Creek Watershed										
Site Code¹	7 Day Ave. Max. Temp. (°F) (# Times 7 Day Ave. Max. > 64°F)									
	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000²
SDAL							61.8 (0)			
JNYU		71.0 (49)				73.9 (59)	73.3 (77)	74.2 (77)	71.0 (69)	73.3 (53)
JNSL						68.8 (29)				
JNYM		81.2 (108)				79.2 (87)	77.5 (85)	78.8 (80)	75.1 (70)	77.2 (53)
BVRL		75.2 (68)		73.3 (61)	69.9 (50)	73.0 (66)	74.7 (84)	76.9 (87)	73.8 (77)	76.2 (54)
CRLI		81.1 (88)		76.7 (63)	74.9 (45)	80.9 (85)	78.3 (87)	79.7 (91)	75.9 (65)	79.0 (59)
KNPS							49.1 (0)			
KNAS							63.4 (0)			
KNSF							66.8 (37)	69.6 (35)		
MILF								69.7 (57)		
LINL		70.9 (13)								
LINF								72.1 (34)		
BXDW					63.6 (0)	67.1 (29)	69.0 (47)	69.7 (48)	66.2 (20)	67.8 (43)
BXON	77.8 (81)	74.7 (19) ³	75.5 (90)	72.0 (73)	71.9 (69)	75.8 (77)	76.4 (86)	75.4 (81)	72.4 (70)	75.7 (84)
PARK								67.2 (29)	63.5 (0)	67.0 (25)
BXO1							74.8 (80)	76.8 (82)	72.6 (70)	76.2 (85)
BXO2							76.5 (79)	77.2 (81)	73.0 (70)	76.3 (85)

Table U-2. CSNM Summer Stream Temperature Monitoring Data for Jenny Creek Watershed										
Site Code ¹	7 Day Ave. Max. Temp. (°F) (# Times 7 Day Ave. Max. > 64°F)									
	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000 ²
BXO3							76.8 (79)	78.0 (83)	73.5 (71)	76.9 (88)
BXO4							78.7 (82)	79.6 (85)	75.6 (94)	79.5 (94)
BXO5							79.0 (82)	80.2 (85)	75.9 (103)	80.4 (95)
BXO6							79.3 (86)	80.3 (86)	76.0 (94)	80.5 (95)
BXO7							80.1 (86)	80.8 (86)	77.2 (104)	81.7 (96)
ORE2								76.8 (11)		
OREG								76.0 (8)		
BXOS	81.1 (79)	82.2 (112)	80.5 (83)	84.2 (122)	79.9 (96)	82.2 (97)	79.6 (89)	80.8 (86)	76.9 (103)	80.7 (95)
LWRX		75.7 (103)			76.9 (104)	79.3 (102)	77.0 (102)	76.7 (82)	74.0 (99)	75.7 (92)

1/ See Table U-1 for site locations.

2/ Provisional data.

3/ Temperature monitoring only conducted for part of the summer season.

Table U-3. CSNM Stream Temperature¹ Monitoring Sites in Klamath-Iron Gate Watershed			
Hydrologic Unit Code ²	Site Code	Site Location	Agency/ Organization ³
18 01 02 06 04 02	DOVN	Dutch Oven Creek above confluence with Camp Creek	BLM
18 01 02 06 04 02	CMPE	East Fork Camp Creek above confluence with West Fork	BLM
18 01 02 06 04 02	CMPW	West Fork Camp Creek above confluence with East Fork	BLM

1/ Stream temperatures monitored with data loggers.

2/ See Table 2-7.

3/ BLM = Bureau of Land Management, Medford District

Table U-4. CSNM Summer Stream Temperature Monitoring Data for Klamath-Iron Gate Watershed						
Site Code¹	7 Day Ave. Max. Temp. (°F) (# Times 7 Day Ave. Max. > 64°F)					
	1995	1996	1997	1998	1999	2000²
DOVN	61.1 (0)	63.8 (0)	55.1 (0)	61.3 (0)	61.5 (0)	65.5 (11)
CMPE			57.8 (0)	64.3 (2)		64.5 (1)
CMPW			63.1 (0)	65.5 (24)		65.4 (13)

1/ See Table U-3 for site locations.

2/ Provisional data.

Table U-5. CSNM Stream Temperature¹ Monitoring Sites in Bear Creek Watershed			
Hydrologic Unit Code²	Site Code	Site Location	Agency/ Organization³
17 10 03 08 01 01	EMPC	Emigrant Creek above Porcupine Creek	BLM
17 10 03 08 01 01	PORC	Porcupine Creek @ confluence with Emigrant Creek	BLM
17 10 03 08 01 01	UTEM	Unnamed tributary to Emigrant Creek, above Green Mtn. Cr.	BLM
17 10 03 08 01 01	GRNU	Green Mountain Creek @ upper BLM bdry section 19	BLM
17 10 03 08 01 01	GRNL	Green Mountain Creek @ lower BLM bdry section 19	BLM
17 10 03 08 01 01	E13U	Emigrant Creek @ upper BLM line section 13	BLM
17 10 03 08 01 01	E13L	Emigrant Creek @ lower BLM line section 13	BLM
17 10 03 08 01 01	EMBD	Emigrant Creek above Baldy Creek	FOG
17 10 03 08 01 01	BDYU	Unnamed tributary to Baldy Creek @ section 17/20 line	BLM
17 10 03 08 01 01	B17L	Unnamed tributary to Baldy Creek @ section 17/18 line	BLM
17 10 03 08 01 01	BD17	Unnamed tributary to Baldy Creek @ section 19/20 line	BLM
17 10 03 08 01 01	B19U	Baldy Creek @ section 19/20 line	BLM
17 10 03 08 01 01	B19L	Baldy Creek @ section 18/19 line	BLM
17 10 03 08 01 01	B13U	Baldy Creek @ section 13/18 line	BLM
17 10 03 08 01 01	B13L	Baldy Creek above confluence with Emigrant Creek	BLM
17 10 03 08 01 01	BALD	Baldy Creek @ confluence with Emigrant Creek	FOG
17 10 03 08 01 01	BUCK	Buckhorn Springs Creek @ section 7/12 line	BLM
17 10 03 08 01 01	TYHB	Tyler Creek above Hobart Creek ⁴	FOG
17 10 03 08 01 01	HBRT	Hobart Creek ⁴ @ confluence with Tyler Creek	FOG

1/ Stream temperatures monitored with data loggers.

2/ See Table 2-7.

3/ BLM = Bureau of Land Management, Medford District; FOG = Friends of the Greensprings

4/ Hobart Creek is not a named stream on the USGS topographic map, and the actual hydrography for the upper reaches of Tyler Creek and stream names for the TYHB and HBRT sites are in question.

Table U-6. CSNM Summer Stream Temperature Monitoring Data for Bear Creek Watershed					
Site Code¹	7 Day Ave. Max. Temp. (°F) (# Times 7 Day Ave. Max. > 64°F)				
	1996	1997	1998	1999	2000²
EMPC				61.9 (0)	63.7 (0)
PORC				58.8 (0)	
UTEM				61.3 (0)	
GRNU				59.5 (0)	
GRNL				52.9 (0)	
E13U				65.0 (10)	
E13L				66.2 (26)	69.2 (38)
EMBD	67.5 (24)	68.9 (46)		67.2 (36)	
BDYU				58.2 (0)	
B17L				59.0 (0)	
BD17				51.6 (0)	
B19U				60.0 (0)	
B19L				54.8 (0)	
B13U				61.6 (0)	
B13L				64.2 (2)	
BALD		65.3 (20)		63.6 (0)	
BUCK				62.2 (0)	

Table U-6. CSNM Summer Stream Temperature Monitoring Data for Bear Creek Watershed					
Site Code¹	7 Day Ave. Max. Temp. (°F) (# Times 7 Day Ave. Max. > 64°F)				
	1996	1997	1998	1999	2000²
TYHB	68.6 (33)		70.1 (55)	64.9 (8)	
HBRT	68.6 (26)		68.3 (35)	64.4 (2)	

1/ See Table U-5 for site locations.

2/ Provisional data.

Table U-7. CSNM Dissolved Oxygen Grab Sample Data for Jenny Creek Watershed							
HUC 6¹	Site Code	Site Location	Dissolved Oxygen (mg/l)				
			5/20/81	6/18/81	7/14/81	8/11/81	9/15/81
04	BVRU	Beaver Creek in SESE of section 13	10.20	10.40	9.40	8.60	9.00
05	KNEN	Keene Creek approx. 1/4 mile above confluence with S. Fork Keene Creek	10.30	9.40	9.30	8.50	9.50
05	KNEP	Keene Creek upstream of Parsnip Lakes in NENW of section 10	10.60	10.50	10.20	9.30	11.00

1/ HUC6 is the 6th field (subwatershed) in the Hydrologic Unit Code (HUC); the HUC5 is 1801020603 for Jenny Creek Watershed. See Table 2-7.

Table U-8. CSNM Fecal Coliform Grab Sample Data for Jenny Creek Watershed							
HUC 6¹	Site Code	Site Location	Fecal Coliform (MPN²/100 ml)				
			5/20/81	6/18/81	7/14/81	8/11/81	9/15/81
04	BVRU	Beaver Creek in SESE of section 13	9.1	7.3	<3.0	43.0	240.0
05	KNEN	Keene Creek approx. 1/4 mile above confluence with S. Fork Keene Creek	9.1	11.0	43.0	240.0	75.0
05	KNEP	Keene Creek upstream of Parsnip Lakes in NENW of section 10	23.0	<3.0	<3.0	21.0	93.0

1/ HUC6 is the 6th field (subwatershed) in the Hydrologic Unit Code (HUC); the HUC5 is 1801020603 for Jenny Creek Watershed. See Table 2-7.

2/ MPN=most probable number

Table U-9. CSNM Turbidity Grab Sample Data Summaries for Jenny Creek Watershed						
HUC 6¹	Site Code	Site Location/Sampling Period	Number of Samples	Minimum Turbidity (NTUs)	Maximum Turbidity (NTUs)	Median Turbidity (NTUs)
01	SDAL	Soda Creek above confluence w/Grizzly Creek (7/91 - 9/00)	124	0.17	126	2.20
01	GRZL	Grizzly Creek above Soda Creek (7/91 - 9/00)	124	0.20	17.5	2.01
01	JNYU	Jenny Creek above Johnson Creek (7/91 - 10/00)	139	0.30	31.4	2.23
03	JNSX	Johnson Creek below road crossing (7/91 - 7/00)	97	0.64	41.0	6.46
04	JNYM	Jenny Creek above Beaver Creek (11/91 - 10/00)	156	0.20	40.4	3.43
04	BVRL	Beaver Creek above Corral Creek (7/91 - 10/00)	173	0.40	70.9	1.55
04	CRLI	Corral Creek @ confluence w/Beaver Creek (7/91 - 10/00)	173	0.40	126	2.70
05	MILL	Mill Creek above confluence with Keene Creek (7/91 - 9/00)	137	0.26	61.4	2.50
05	LINL	Lincoln Creek above confluence with Keene Creek (7/91 - 7/00)	141	0.90	35.9	5.50
05	KNEX	Keene Creek below Lincoln Creek (10/91 - 9/00)	163	0.10	86.7	3.04
06	BXON	Jenny Creek below Keene Creek (7/91 - 10/00)	161	0.50	61.2	2.60
06	LWRX	Jenny Creek below Spring Creek (7/91 - 10/00)	180	0.53	66.5	2.60

1/ HUC6 is the 6th field (subwatershed) in the Hydrologic Unit Code (HUC); the HUC5 is 1801020603 for Jenny Creek Watershed.

See Table 2-7.

Table U-10. CSNM Turbidity Grab Sample Data for Klamath-Iron Gate Watershed						
Site Code¹	Turbidity (NTU)					
	June 1998	October 1998	June 1999	October 1999	June 2000	October 2000
DOVN	1.52	0.44	1.50	0.78	1.67	1.31
CMPE	3.15	0.47			1.31	2.65
CMPW	1.54				2.61	

1/ See Table U-3 for site locations.

Table U-11. CSNM Turbidity Grab Sample Data for Bear Creek Watershed				
Site Code¹	Turbidity (NTU)			
	June 1999	October 1999	June 2000	October 2000
EMPC	3.40	1.06	1.77	1.18
PORC	2.20	1.03		
UTEM	4.18	1.34		
GRNU	1.53			
GRNL	2.83	3.33		
E13U	3.26	0.90		
E13L	6.34	0.92	2.02	0.73
BDYU	3.89	0.84		
B17L	10.4			
BD17	1.41			
B19U	3.64	1.31		
B19L	5.71			
B13U	3.70	1.26		
B13L	5.63	1.39		
BUCK	1.17	2.18		

1/ See Table U-5 for site locations.

Appendix V - Visual Resource Management

The Bureau of Land Management's requirement to manage the scenic resources on public lands is established by law within the Federal Land Policy and Management Act of 1976 (FLPMA) and the National Environmental Policy Act of 1969 (NEPA). While the agency is entrusted with managing for multiple uses, the BLM is responsible for ensuring that the scenic values of these lands is considered before allowing, any uses that might create negative visual impacts. This is accomplished through the use of the agency's Visual Resource Management (VRM) system for the inventory, allocation, and analysis of scenic values.

Under the VRM system, lands are allocated to one of four visual resource management classes, based upon an inventory of sensitivity levels, viewer distances, and scenic quality. The objectives for these classes are described in the BLM VRM Manual, Section 8410 as:

Visual Resource Class I:

The objective for this class is to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention.

Visual Resource Class II:

The objective of this class is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

Visual Resource Class III:

The objective of this class is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

Visual Resource Class IV:

The objective of this class is to provide for management activities which require major modifications of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements.

Appendix W - Public Comments about Draft CSEAA/DEIS Compiled by Southern Oregon University

Comment Totals Table

There were 6,641 comments counted from 816 letters. These totals do not include those comments where the person said the same thing more than one time. It also does not include the comments of 133 form letters not provided to the compiler. This effects the validity of the percentages. Also, those comments that have zero as their total were detected at least once on the first reading of the comments, but somehow were not picked out on the reading to code the information.

Comment Code	Code Explanation	Total Comments	Percent of All Comments
1A	1 - National Monument/Wilderness Area Designations A. For The National Monument/Wilderness Area Designations	74	9
1A#1	1 - National Monument/Wilderness Area Designations A. For The National Monument/Wilderness Area Designations 1. With Strong and Logical Language	2	0.2
1B	1 - National Monument/Wilderness Area Designations B. For The National Monument/Wilderness Area Designations for both OR & CA	31	4
1C	1 - National Monument/Wilderness Area Designations C. Against The National Monument/Wilderness Area Designations	48	6
1D	1 - National Monument/Wilderness Area Designations D. Against Including HRWA/CA In National Monument	34	4
1E	1 - National Monument/Wilderness Area Designations E. Concerns About Jurisdictions	10	1
1E #1	1 - National Monument/Wilderness Area Designations E. Concerns About Jurisdictions 1. CA Laws Are Different & Governmental Structure is Different	4	0.5
1F	1 - National Monument/Wilderness Area Designations F. Against Pieces of The National Monument/Wilderness Area Designations *	2	2
1G	1 - National Monument/Wilderness Area Designations G. Distressed/Angry That The National Monument Designation Was Completed Before The CSNM Process Was Finished.	11	1
1H	1 - National Monument/Wilderness Area Designations H. For Separate CA Protection Plan	1	0.1
2A	2 -Land Acquisition Plans A. For Acquiring Private Property From Willing Sellers/For Acquiring More Land	218	27
2B	2 -Land Acquisition Plans B. For Acquiring As Much Adjacent CA Land As Possible/For Land Acquisition in HRWA	30	4
2C	2 -Land Acquisition Plans C. For Acquiring More Land for Wildlife To Provide Habitat Connectivity And/Or Water Quality	35	4

Comment Code	Code Explanation	Total Comments	Percent of All Comments
2D	2 -Land Acquisition Plans D. Opposed To Acquiring More Land	35	4
2E	2 -Land Acquisition Plans E. Against Acquiring CA Land	8	1
2E #1	2 -Land Acquisition Plans E. Against Acquiring CA Land 1. Private or Public	28	3
2F	2 -Land Acquisition Plans F. Concern Over The Land That Was Sold & The Land That Was to be Acquired to Replace It/Concerned BLM is Abandoning Acquisition Plans for HRWA	8	1
2G	2 -Land Acquisition Plans G. For Reduction of HRWA— Against Increase/Acquiring of HRWA	86	11
2H	2 -Land Acquisition Plans H. Against The Government Managing Anymore Land	3	0.3
2I	2 -Land Acquisition Plans I. Fear Of The Government Taking Private Land (“Land Grabbing”)/Federal And State Governmental Condemnation (Confiscation, Or Annexation)	24	3
2J	2 -Land Acquisition Plans J. Support A No Net Loss of Private Lands Policy	7	0.9
2K	2 -Land Acquisition Plans K. Concerned That CA/HRWA Won’t Be In The CSNM	5	0.6
2L	2 -Land Acquisition Plans L. Specific Acquisition Suggestions	64	8
3A	3 -Public Access To Area vs. Decommissioning of Roads A. For Closing All Unnecessary Non-Residential Roads/Right of Ways & Jeep Trails	209	26
3B	3 -Public Access To Area vs. Decommissioning of Roads B. Against Decommissioning of Roads	101	12
3B #1	3 -Public Access To Area vs. Decommissioning of Roads B. Against Decommissioning of Roads 1- For Upgrading existing roads to prevent erosion.	6	0.7
3C	3 -Public Access To Area vs. Decommissioning of Roads C. For A Middle Ground Approach—Some Roads Should Be Improved; Some Roads Should Be Closed Seasonally; Some Roads Should Just Be Closed.	7	0.8

Comment Code	Code Explanation	Total Comments	Percent of All Comments
3D	3 -Public Access To Area vs. Decommissioning of Roads D. Detailed Road-Use And Right-Of-Way Study Needed To Explain Which Roads To Keep Open/Road Should Be Closed On A Case By Case Basis.	7	0.8
3E	3 -Public Access To Area vs. Decommissioning of Roads E. Comments About Keeping The Area Open To Public /Public Lands Should Be Managed For All/Against Loss of Freedoms	99	12
3E #1	3 -Public Access To Area vs. Decommissioning of Roads E. Comments About Keeping The Area Open To Public /Public Lands Should Be Managed For All/Against Loss of Freedoms 1- Decisions to change land use from multiple use to preservation should be based on good science and sound logic. CSNM had n one.	64	8
3F	3 -Public Access To Area vs. Decommissioning of Roads F. Specific Comments About Schoheim Road	0	0
3F #1	3 -Public Access To Area vs. Decommissioning of Roads F. Specific Comments About Schoheim Road 1- Keep it open.	20	2
3F #2	3 -Public Access To Area vs. Decommissioning of Roads F. Specific Comments About Schoheim Road 2- Close It.	215	26
3G	3 -Public Access To Area vs. Decommissioning of Roads G. CSNM Would Discriminate Against The Old, Young, and Handicapped...	29	3
3G #1	3 -Public Access To Area vs. Decommissioning of Roads G. CSNM Would Discriminate Against The Old, Young, and Handicapped... 1- It would benefit only a few wealthy and people with leisure time	1	0.1
3H	3 -Public Access To Area vs. Decommissioning of Roads H. For Having ORV's & Other Mechanized Recreation	8	1
3I	3 -Public Access To Area vs. Decommissioning of Roads I. Against Having ORV's & Other Mechanized Recreation	244	30
3J	3 -Public Access To Area vs. Decommissioning of Roads J. Limit OHVs To Designated Road/Reasonable Limits.	10	1
3K	3 -Public Access To Area vs. Decommissioning of Roads K. For Non-Motorized Recreation	18	2

Comment Code	Code Explanation	Total Comments	Percent of All Comments
3L	3 -Public Access To Area vs. Decommissioning of Roads L. For No Limits to Non-Motorized Recreation/Permitting— but not promoting— all forms of non-mechanized public lands recreation off gravel and paved roads throughout the area.	183	22
3M	3 -Public Access To Area vs. Decommissioning of Roads M. Concerns About Access to Hunting & Fishing	15	2
3N	3 -Public Access To Area vs. Decommissioning of Roads N. Concerns About Fire, Emergency and other Management Access and For Escape for Private Land Owners	36	4
3O	3 -Public Access To Area vs. Decommissioning of Roads O. Misc. About Roads and Access to Area	227	28
4A	4- All Commodity Use and Extraction A. For All Commodity Use and Extraction (Grazing, Timber, Mining, & Development)	74	9
4B	4- All Commodity Use and Extraction B. Against All Commodity Use and Extraction (Grazing, Timber, Mining, & Development)	214	26
5A	5- Comments and Concerns About Grazing A. For Grazing	114	14
5B	5- Comments and Concerns About Grazing B. Against Grazing	48	6
5B #1	5- Comments and Concerns About Grazing B. Against Grazing 1- Cattle Ranchers have been subsidized long enough.	2	0.2
5C #1	5- Comments and Concerns About Grazing C. Grazing As A Management Tool 1- For	19	2
5C #2	5- Comments and Concerns About Grazing C. Grazing As A Management Tool 2- Against	28	3
5C #3	5- Comments and Concerns About Grazing C. Grazing As A Management Tool 3- Allowed Only in Exceptional Circumstances or Research Purposes	1	0.1
5D	5- Comments and Concerns About Grazing D. Who Will “Monitor” To See That The Grazing Is Done In Proper Areas?/How Will The Management Be Done?/Cattle vs. Fences	7	0.8

Comment Code	Code Explanation	Total Comments	Percent of All Comments
5E	5- Comments and Concerns About Grazing E. Cattle & Noxious Weeds vs. Native Plants	9	1
5F	5- Comments and Concerns About Grazing F. Comments Concerning The Menke Report	15	2
5G #1	5- Comments and Concerns About Grazing G. The Box O Ranch Comments 1- Same-For Grazing There	26	3
5G #2	5- Comments and Concerns About Grazing G. The Box O Ranch Comments 2- Change-No Grazing There	9	1
5H	5- Comments and Concerns About Grazing H. Cattle Compete For Forage Needed By Deer, Elk, And Their Young	20	2
5I	5- Comments and Concerns About Grazing I. Misc. About Grazing and Ranching	32	4
5J	5- Comments and Concerns About Grazing J. Cattle & Water Quality	3	0.3
6A	6- Comments And Concerns About Timber A. For Timber Extraction	89	11
6B	6- Comments And Concerns About Timber B. Against Timber Extraction	23	3
6C	6- Comments And Concerns About Timber C. Comments About "Forest Health Reserves" (FHRs)	3	0.3
6C #1	6- Comments And Concerns About Timber C. Comments About "Forest Health Reserves" (FHRs) 1) Novel, New, Experimental, Questionable	13	2
6C #2	6- Comments And Concerns About Timber C. Comments About "Forest Health Reserves" (FHRs) 2) No documentation as to meaning, or what will happen with this designation	12	1
6C #3	6- Comments And Concerns About Timber C. Comments About "Forest Health Reserves" (FHRs) 3) FHRs is OK.	1	0.1
6D	6- Comments And Concerns About Timber D. Comments About Timber Matrixes	2	0.2
6D #1	6- Comments And Concerns About Timber D. Comments About Timber Matrixes 1- For	0	0

Comment Code	Code Explanation	Total Comments	Percent of All Comments
6D #2	6- Comments And Concerns About Timber D. Comments About Timber Matrixes 2- Against	11	1
6E	6- Comments And Concerns About Timber E. Late Successial Reserves	0	0
6E #1	6- Comments And Concerns About Timber E. Late Successial Reserves 1- For	13	2
6E #2	6- Comments And Concerns About Timber E. Late Successial Reserves 2- Against	2	0.2
6F	6- Comments And Concerns About Timber F. Forest, Insects, & Disease	1	0.1
6G	6- Comments And Concerns About Timber G. Support Some Thinning, Based on Scientifically defensible standards (Understory Thinning)	9	1
6H	6- Comments And Concerns About Timber H. Misc. About Timber	18	2
6I	6- Comments And Concerns About Timber I. Balanced Approach to Timber Harvesting. (No clear cutting, but no ban on all harvesting/Selective Logging)	11	1
6J	6- Comments And Concerns About Timber J. Timber Harvest for Scientific Research or Demonstration	2	0.2
7A	7- Costs to Taxpayers/ Local Economies A. CSNM Will Be Good For The Economy	6	0.7
7B	7- Costs to Taxpayers/ Local Economies B. CSNM Will Be Bad For The Economy	29	4
7C	7- Costs to Taxpayers/ Local Economies C. Specifics About CSNM and The Economy	1	0.1
7D	7- Costs to Taxpayers/ Local Economies D. Socio-Economic Impacts Have Not Been Addressed	67	8
7E	7- Costs to Taxpayers/ Local Economies E. Concerned About Costs to Taxpayers & Changes in Property Tax Rolls	17	2
7F	7- Costs to Taxpayers/ Local Economies F. Concerned About Cost And Agents To Monitor For ORV Violators	8	1

Comment Code	Code Explanation	Total Comments	Percent of All Comments
7G	7- Costs to Taxpayers/ Local Economies G. Concerned About Cost of Fencing and Management of Grazing	10	1
7H	7- Costs to Taxpayers/ Local Economies H. Concerned About Economic Effects Of Changing Grazing Practices From Commodity To Ecological	30	4
7H #1	7- Costs to Taxpayers/ Local Economies H. Concerned About Economic Effects Of Changing Grazing Practices From Commodity To Ecological 1- If no grazing cattlemen will sell land to developed/Cattle Producers Will Quit/ It will Put Them Out of Business.	35	4
7I	7- Costs to Taxpayers/ Local Economies I. Misc. Cost Comments	60	7
8A	8 -Small Vocal Group Ruling the Decision A. For Listening To Local Groups In Making The Decisions/Weighting The Comments Of Local Residents Within And Near CSNM More Heavily Than Out-Of-Area Users Or Recreationists/Locals Should Control The Decisions (Local Officials And People)	84	10
8B	8 -Small Vocal Group Ruling the Decision B. Land Belongs to All Americans and so Effects More Than Just Local People.	4	0.5
8C #1	8 -Small Vocal Group Ruling the Decision C. Against Letting A Small Vocal Group (of Ranchers) Ruling the Decision/Don't Let A Radical Group (of Environmentalist) Rule Over The Majority Of The Population 1- Don't Let A Small Group of Environmentalist Rule The Decision.	13	2
8C #2	8 -Small Vocal Group Ruling the Decision C. Against Letting A Small Vocal Group (of Ranchers) Ruling the Decision/Don't Let A Radical Group (of Environmentalist) Rule Over The Majority Of The Population 2- Don't Let A Small Group of Ranchers/Anti-Environmentalist Rule The Decision.	21	3
8D	8 -Small Vocal Group Ruling the Decision D. Concern Over The Mis-Information That Is Out There.	4	0.5
8E	8 -Small Vocal Group Ruling the Decision E. Let The Decision Be Made For The Ecological Biodiversity of The Region Over The Economy of Jackson County & the Area.	1	0.1
9	9 - Alternative A Comments	1	0.1

Comment Code	Code Explanation	Total Comments	Percent of All Comments
9A	9 - Alternative A Comments A. Comments For	10	1
9B	9 - Alternative A Comments B. Comments Against	66	8
10A	10 - Alternative B Comments A. Comments For	89	11
10B	10 - Alternative B Comments B. Comments Against	7	0.8
11	11 - Combine Alternatives A & B.	31	4
12	12 - Alternative C Comments	3	0.3
12A	12 - Alternative C A. Comments For	19	2
12B	12 - Alternative C Comments B. Comments Against	151	19
13	13 - Alternative D Comments	2	0.2
13A	13 - Alternative D Comments A. Comments For	43	5
13B	13 - Alternative D Comments B. Comments Against	146	18
14	14 -Combine Alternatives C & D.	32	4
15A	15 -Alternative E Comments A. Comments For B. Comments Against	4	0.5
15B	15 -Alternative E Comments B. Comments Against	68	8
16A	16 -Government/Management A. Too Much Big Government In Community Affairs	26	3
16A #1	16 -Government/Management A. Too Much Big Government In Community Affairs 1- Too much regulations	1	0.1
16A #2	16 -Government/Management A. Too Much Big Government In Community Affairs 2- The Government just does as it pleases with regard to local input/Decision is already made/Dictatorial/DEIS/EIS is a Sham	16	2

Comment Code	Code Explanation	Total Comments	Percent of All Comments
16B	16 -Government/Management B. Concerns Over The BLM’s Management of Land It Already Has/Questions The BLM ‘s Ability To Manage The National Monument.	31	4
16B #1	16 -Government/Management B. Concerns Over The BLM’s Management of Land It Already Has/Questions The BLM ‘s Ability To Manage The National Monument. 1- Washington D.C. Politicians Don’t Know Daily Conditions.	2	0.2
16C	16 -Government/Management C. Private Property Owners Are The Best Stewards Of The Land/The Land Is The Way It Is Because Of The Past & Current Property Owners— By Private Citizen Involvement	14	2
16C #1	16 -Government/Management C. Private Property Owners Are The Best Stewards Of The Land/The Land Is The Way It Is Because Of The Past & Current Property Owners— 1- Please do not destroy this land by trying to save it.	75	9
16C #2	16 -Government/Management C. Private Property Owners Are The Best Stewards Of The Land/The Land Is The Way It Is Because Of The Past & Current Property Owners— 2- “An Area Which Has Escaped The Impact of Man” Is False... Shows No Knowledge of Area/It Got That Way By Being Managed For Multiple Use.	23	3
16D	16 -Government/Management D. Effects On Private Land/Threatens Property Rights	50	6
16E	16 -Government/Management E. For Management Practices Used Only To Prevent The Loss of Biological and Ecological Values and For Research or Scientific Purposes That Would Enhance The Area/Ecological Management	6	0.7
16F	16 -Government/Management F. The Plan Needs More Specifics As To <u>How</u> Preservation & Restoration Will Be Implemented	5	0.6
16G #1	16 -Government/Management G. Question the Science of the EIS 1- Too much emphasis on unproven experimental (unknown or poorly research) management prescriptions such as livestock grazing to control weeds, unsubstantiated or poorly defined forest health prescriptions, and unproven land designations (Forest Health Reserves).	15	2

Comment Code	Code Explanation	Total Comments	Percent of All Comments
16G #2	16 -Government/Management G. Question the Science of the EIS 2- Should Recognize and Use The “Core-buffer” Management Principle/Wild Core & Rural Interface Management	18	2
16G #3	16 -Government/Management G. Question the Science of the EIS 3- Should have high burden of proof before undertaking intensive management.	7	0.8
16G #4	16 -Government/Management G. Question the Science of the EIS 4- No Scientific Reason for Such Drastic Action As Described in CSNM DMP/EIS	95	12
16H	16 -Government/Management H. Law Violations	25	3
16H #1	16 -Government/Management H. Law Violations 1- CSNM is Unconstitutional	6	0.7
16H #2	16 -Government/Management H. Law Violations 2- Federal Land Policy & Management Act	33	4
16H #3	16 -Government/Management H. Law Violations 3- Sec. 302(b) of the Federal Land Policy & Management Act (not protecting it enough)	1	0.1
16H #4	16 -Government/Management H. Law Violations 4- NEPA (national Environmental Policy Act)	42	5
16H #5	16 -Government/Management H. Law Violations 5- Executive Order 12898 (1994)	53	6
16H #6	16 -Government/Management H. Law Violations 6- Oregon Forest Practices Act	0	0
16H #7	16 -Government/Management H. Law Violations 7- Taylor Grazing Act	30	4
16H #8	16 -Government/Management H. Law Violations 8- O&C Act	32	4

Comment Code	Code Explanation	Total Comments	Percent of All Comments
16H #9	16 -Government/Management H. Law Violations 9- Taking of Multiple Use Lands Must Have Legal Justification, Not Just on Executive Order.	65	8
16H #10	16 -Government/Management H. Law Violations 10. Northwest Forest Plan	6	0.7
16H #11	16 -Government/Management H. Law Violations 11. Misc.	3	0.3
16H #12	16 -Government/Management H. Law Violations 12. Civil Rights	4	0.5
16H #13	16 -Government/Management H. Law Violations 13. State & County Land Planning Laws	5	0.6
16I	16 -Government/Management I. Litigation Threatened Over National Monument Process	5	0.6
16J	16 -Government/Management J. Government Actions Must Be Heavily Monitored and checked	0	0
16K	16 -Government/Management K. Misc. Management Comments	25	3
17A	17 -Protect the Wildlife/Bio-Diversity A. For Wildlife/Bio-Diversity Protection, Restoration & Stability	440	54
17A #1	17 -Protect the Wildlife/Bio-Diversity A. For Wildlife/Bio-Diversity Protection, Restoration & Stability 1- For The Maintenance and Preservation Of The Rare And Unique Ecological Processes, Conditions And Habitats With Minimum Human Intervention	110	13
17B	17 -Protect the Wildlife/Bio-Diversity B. Against Wildlife/Bio-Diversity Protection (Protection is not needed)	8	1
17C	17 -Protect the Wildlife/Bio-Diversity C. Balance Between Protection Of Bio-Diversity/Wildlife And People's Right To Live In, Enjoy And Use Public Land Such As The CSNM.	147	18

Comment Code	Code Explanation	Total Comments	Percent of All Comments
17D	17 -Protect the Wildlife/Bio-Diversity D. This Kind Of Protection Will Be Bad For Wildlife, Preserving The Land Will Not Save It, Only Damage It Due To Poor Management/All The Bio-Diversity Is There Because Of Changes man Has Made.	22	3
17D #1	17 -Protect the Wildlife/Bio-Diversity D. This Kind Of Protection Will Be Bad For Wildlife, Preserving The Land Will Not Save It, Only Damage It Due To Poor Management/All The Bio-Diversity Is There Because Of Changes man Has Made. 1- Grazing and Effective Timber harvest Practices Promote Biodiversity	49	6
17E	17 -Protect the Wildlife/Bio-Diversity E. EIS Pays Insufficient Attention To Sensitive Local And Endemic Species.	18	2
17F	17 -Protect the Wildlife/Bio-Diversity F. Concern for Fish	4	0.5
17G	17 -Protect the Wildlife/Bio-Diversity G. Concern for Deer & Elk Winter Range	67	8
17G #1	17 -Protect the Wildlife/Bio-Diversity G. Concern for Deer & Elk Winter Range 1- Let The Deer, Elk, & other Native Grazers Ensure Greater Biodiversity.	1	0.1
17H	17 -Protect the Wildlife/Bio-Diversity H. CSNM Needed For Northern Spotted Owl Habitat Recovery	6	0.7
17I	17 -Protect the Wildlife/Bio-Diversity I. Concern for Noxious Weeds vs. Native Plants	12	1
17J	17 -Protect the Wildlife/Bio-Diversity J. Concerns About Water Quality/Water Shed Restoration	20	2
17K	17 -Protect the Wildlife/Bio-Diversity K. Misc	70	9
18A	18 - Concerns About Fire As A Management Tool A. Prescribed/Controlled Fire	40	5
18B	18 - Concerns About Fire As A Management Tool B. No Prescribed/Controlled Fire— Active Fire Protection	183	22
18C	18 - Concerns About Fire As A Management Tool C. Fear of Catastrophic Fires with Prescribed/Controlled Fire	112	14

Comment Code	Code Explanation	Total Comments	Percent of All Comments
18D	18 - Concerns About Fire As A Management Tool D. Prescribed/Controlled Fire Threat To Wildlife	80	10
18E	18 - Concerns About Fire As A Management Tool E. Questions	32	4
18F	18 - Concerns About Fire As A Management Tool F. Prescribed/Controlled Fire OK If Handled With Great Care	1	0.1
19A	19 - Changes To Historical Culture Of Area vs. Saving Area For Future Generations A. National Monument/Wilderness Area Designations Will Change The Historical Culture of Area	71	9
19A1	19 - Changes To Historical Culture Of Area vs. Saving Area For Future Generations A. National Monument/Wilderness Area Designations Will Change The Historical Culture of Area 1- Gives Kids something to Do To Stay Out of Trouble	1	0.1
19B	19 - Changes To Historical Culture Of Area vs. Saving Area For Future Generations B. For Saving Area For Future Generations	19	2
20A	20- Comments On Map & Boundaries A. Ecological, Watershed Based Boundaries	20	2
20B	20- Comments On Map & Boundaries B. Boundaries Straight As Possible	3	0.3
20C	20- Comments On Map & Boundaries C. Comments On Map	27	3
21	21-Misc. Access Ideas	1	0.1
21A	21-Misc. Access Ideas A. Visitor center	0	0
21B	21-Misc. Access Ideas B. ORV Park	1	0.1
21C	21-Misc. Access Ideas C. Handicap Accessible Places	1	0.1
21D	21-Misc. Access Ideas D. Public Education Program	4	0.4
21E	21-Misc. Access Ideas E. Volunteer Program	1	0.1
21F	21-Misc. Access Ideas F. Trails	1	0.1

Comment Code	Code Explanation	Total Comments	Percent of All Comments
22	22- Misc. Suggestions to Change The Plan	14	2
23	23- Misc. Concerns & Questions	22	3
24	24-Stand Alone Letters That Report Writers Should Read Themselves	43	5
25	25- For None Of The Alternatives	30	4
26	26- The Draft Is Confusing, Ambiguous with Omissions, Has Errors, and Is Contradictory	81	10

Appendix X - Comments by Government Agencies

Note: The letters contained in this Appendix are Federal, State and local government comments on the Cascade Siskiyou Ecological Emphasis Area Draft Management Plan/ Environmental Impact Statement.



Oregon

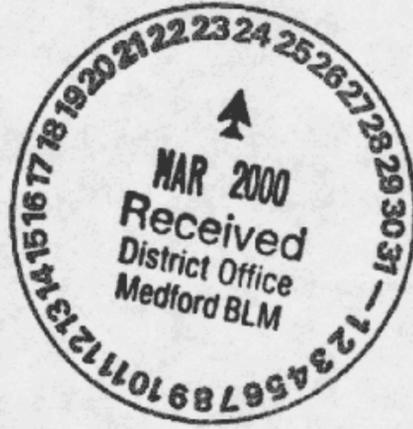
John A. Kitzhaber, M.D., Governor

Parks and Recreation Department

State Historic Preservation Office
1115 Commercial St. NE
Salem, OR 97301-1012
(503) 378-4168
FAX (503) 378-6447

March 21, 2000

Tom Sensenig
Bureau of Land Management
3040 Biddle Road
Medford, OR 97504



File Code: Jackson

RE: Draft Management Plan and Environmental Statement
for the Cascade Siskiyou Ecological Emphasis Area

Dear Mr. Sensenig:

Thank you for forwarding the Draft Environmental Impact Statement (DEIS) for the Cascade Siskiyou Ecological Emphasis Area (CSEEA). It is clear from the contents of the document that there are historic sites located in the management plan's area of potential effect (APE). While the DEIS represents compliance with the National Environmental Policy Act, it does not meet the requirements of Section 106 of the National Historic Preservation Act. Compliance with Section 106 will require a separate submittal addressing the National-Register eligibility of the historic sites in the APE and a description of the effects of the management plan on the individual sites.

If you should have any further questions, or need additional assistance, please feel free to contact me at the SHPO, extension 229.

Sincerely,

Christine A. Curran
Preservation Specialist



United States Department of the Interior

000445

U.S. GEOLOGICAL SURVEY
Reston, Virginia 22092

MAY 11 2000

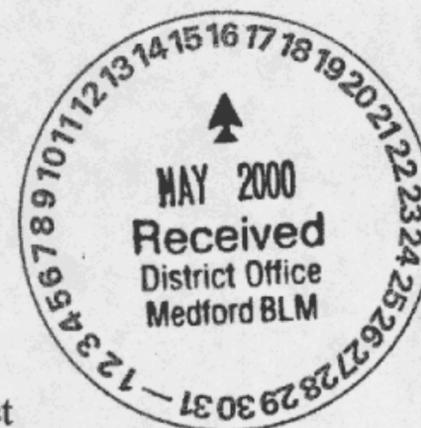
In Reply Refer To:
Mail Stop 423

MEMORANDUM

To: Tom Sensenig, Bureau of Land Management Cascade
Siskiyou Ecological Area Team Leader Medford, Oregon

From: *for* James F. Devine *John Devine*
Senior Advisor for Science Applications

Subject: Review of the Draft Management Plan/Environmental Impact
Statement for the Cascade Siskiyou Ecological Emphasis Area



The U.S. Geological Survey has reviewed the Draft Management Plan (MP)/Environmental Impact Statement (EIS) and has the following observations and comments. As noted in the Draft MA/EIS, "The guiding principle for management of the Area (CSEEA) [Cascade Siskiyou Ecological Emphasis Area] is to maintain, protect, restore or enhance relevant and important cultural, biological and ecological resource values. All other considerations are secondary to this guidance." (page iii).

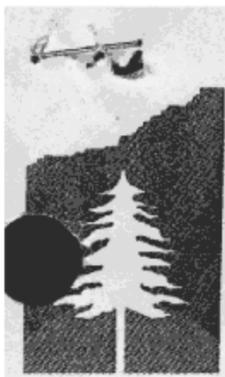
The preferred alternative (Alternative C) will work to the long-term positive benefit of this ecologically sensitive area, consistent with the above noted guiding principle. However, from a hydrologic perspective, Alternative D, which emphasizes "the maintenance and preservation of the rare and unique ecological processes, conditions, and habitats in the CSEEA with minimum human intervention," has fewer or less serious potential adverse and cumulative effects on streamflows (Tables 4-6, and 4-7, page 231) and water-quality (Table 4-8, page 232 and Table 4-9, page 233). From a hydrologic perspective, therefore, Alternative D is more consistent with the guiding principle than the preferred Alternative C.

Further, the potential water-quality impacts will result primarily from eroded roadways and from grazing and timber harvest practices. Thus, Alternative D also would appear to provide greater relief from the adverse water-quality impacts of these activities than would Alternative C.

Accordingly, the specific rationale for selection of Alternative C should be clearly stated as the basis for the proposed actions.

Thank you for the opportunity to review this Draft MA/EIS.

Copy to: Office of Environmental Policy and Compliance



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JACKSON COUNTY

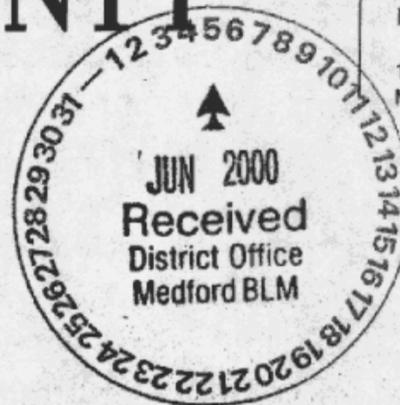
Oregon

Board of County Commissioners

Ric Holt (541) 774-6117
Jack Walker (541) 774-6118
Sue Kupillas (541) 774-6119
Fax (541) 774-6705

10 South Oakdale, Room 200
Medford, Oregon 97501

May 26, 2000



Tom Sensenig, BLM CSEEA Team Leader
Medford District
Bureau of Land Management
3040 Biddle Road
Medford, Oregon 97504

The following are comments from the Jackson County Board of Commissioners, Jackson County, Oregon on the Draft Management Plan and Environmental Statement (DEIS) for the Cascade Siskiyou Ecological Emphasis Area. We appreciate the opportunity to comment.

1. SUMMARY OF COMMENTS

As to the proposed range of actions, the Board of Commissioners supports a combination of Alternatives A and B of the CSEESA, one which adheres to the goals of the President's Forest Plan as outlined in The Northwest Forest Plan, Report to the President and Congress 1996.

The Forest Plan orders agencies to balance environmental, economic and social issues as required Federal Land Policy Management Act (FLPMA), NEPA and the O & C Act. Goals of the Plan are: 1) adhere to the nation's laws; 2) protect and enhance the environment; 3) provide a sustainable timber economy; 4) support the region's people and communities during the economic transition and, 5) ensure that federal agencies work together.

Alternatives C and D are extreme, and do not further the multiple-use goals of either the Forest Plan, or of the underlying federal statutes. Alternatives C and D do not recommend decisions that are based on the best science available and on existing studies.

As a vehicle merely for the management decisions it discusses, the DEIS is inadequate. As a vehicle for the Secretary's potential designation of a National Monument within the area, it is even more inadequate. NEPA applies to that potential designation.

2. DEIS FOR THIS PROPOSAL IS INADEQUATE

We believe the current DEIS is inadequate under NEPA, even for the stated purposes of the DEIS.

The Medford District of the Bureau of Land Management possesses information about the current and past condition of the Cascade Siskiyou Ecological Emphasis Area. That information has not been included in the DEIS. We believe it shows that the current condition of the analysis area has arisen under multiple use management (as described in Chapter 2, DEIS), and is due in major part to such management. We entered a Freedom of Information Act request for that information, and received a number of BLM documents on May 25. As of this writing, we have not had time to analyze them. We thank the Medford District for producing those documents, but it should not have been necessary to resort to an FOIA request when the agency is in the midst of complying with NEPA. Decisions should be based on the most current and complete information available.

We believe the social impacts of the various proposals need further attention. Specifically, BLM should apply its own **Guide to Social Assessment**, and interpret the proposed action in light of those guidelines.

We also believe that the anticipated report by Dr. Menke (which is apparently due in June) should be included in the DEIS, and that BLM should consider public comments to that report before making a decision.

As to the specific alternatives:

A combination of Alternatives A & B most closely implement the information and research described in the existing Menke Report (included in this DEIS). Carefully designed irrigation, management, and grazing are required for the pastures to fight off weed infestations, water hungry tap-rooted weeds, and the eventual downgrading of the Jenny Creek riparian areas.

Alternative C would manage aggressively to restore desirable grasses, but the negative inferences about grazing that support Alternative C are not born out in the research information.

Further, Alternative C does not address the economic effects of changing grazing practices from commodity based to ecologically based decisions. To meet the goals of the Northwest Forest Plan, and to comply with NEPA, Alternative C's economic,

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social and environmental objectives must be discussed. We have asked Dr. Frederick W. Obermiller, Oregon State University, (an expert on public land economics, policy and law) to assess the alternatives, their financial affects on local ranching operations and their cumulative economic effects on the cattle industry in Jackson County. We will gladly share with you the results of his analysis. BLM is, of course, free to consult its own experts; our point is that the DEIS should contain some more detailed consideration of those potential impacts.

Alternative C would limit public access and reduce the multiple uses available to the public (including recreation) in an expanded area. Alternative C thus does not meet the goals of the Northwest Forest Plan, the O & C Act, or FLPMA. In addition, the management envisioned by Alternative C is in direct violation of the agreement between Jackson County and BLM as to the management of the Box O Ranch area. As you may recall, the County voiced no objection to the land exchange between the Box O and Cascade Ranches, based on a specific promise by BLM as to management of those lands, namely "no net loss of commercial timber base lands" and the maintenance of multiple use.(original emphasis) (See Attachments A, B and C to this letter).

Alternative D also violates the multiple use goals of the Northwest Forest Plan, the O & C Act and FLPMA. Alternative D does not take into effect the cumulative social and economic effects of withdrawing grazing, harvest and recreational uses. As discussed above, there would be significant effects on the human environment with the cumulative effects of withdrawing uses for grazing, timber and recreation.

Alternative E changes current multiple uses to achieve RNA objectives. This significantly changes the land use and violates the Northwest Forest Plan, the O & C Act, FLPMA. The cumulative effects are not adequately addressed and mitigated, and there has not been adequate involvement with local governments on changes in land use.

As to all alternatives, the DEIS deals inadequately with the issue of fire. The most current map issued by the USFS and BLM shows that the entire area considered in the DEIS is in extreme fire danger area (See attachment D to this letter). The DEIS itself estimates that virtually all the acreage of the CSEESA faces moderate or high fire hazard. Yet, at p. 219 of the DEIS, the elimination of prescribed burns is eliminated from further discussion.

The lessons of the recent fire in the Los Alamos area should not be ignored. When prescribed fire was used there, the outcome was disastrous. Prescribed fire in this

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area would product significant risk to the entire area, including many homes.

There is need for removal of small diameter material for fire suppression and reduction of fire hazard. Reduction by harvest treatment is the scientifically acceptable solution. Discussion of other alternatives, or non-management puts ecosystems and private ranches at risk, and introduces significant financial risk and liability for Jackson County in fire-emergency response. Jackson County is the Emergency Management agency for the entire county. The proposed alternatives that propose anything but aggressive fire management in all proposed alternatives put the entire ecosystem and Jackson County at risk. This is especially troubling to us, since the Forest Service is now contemplating closure of the fire tanker base at the airport in Medford.

Finally, as to this DEIS, Jackson County opposes alternatives that expand the land base of the proposed alternatives, any larger that the original 29,159 acres. This was not a part of the original CSEEA proposal and is opposed by this board. This would clash with our land use planning objectives in Jackson County. As stated above, we support a reasonable combination of Alternatives A and B.

3. DEIS IS ESPECIALLY INADEQUATE FOR NATIONAL MONUMENT DESIGNATION

Though not discussed in the DEIS, it is apparent that the Secretary of the Interior is considering designation of some or all of the analysis area as a National Monument, pursuant to the Antiquities Act of 1906, 16 U.S.C. §431. We realize that the DEIS does not purport to analyze the Secretary's range of National Monument options. However, that is precisely the problem.

We believe that the Secretary is subject to NEPA when he considers such a designation. Under *State of Alaska v. Carter*, 462 F. Supp. 1155 (D. Alaska 1978), National Monument designations were exempted from NEPA only where the President initiates the action, and directs a cabinet member to study the proposal. Here, though, the situation is fundamentally different. It is clear that Secretary Babbitt has initiated the potential designation, not President Clinton. Thus, the limited NEPA exemption of *Alaska v. Carter* does not relieve the Secretary of his statutory obligations under NEPA.

Since no other document purporting to comply with NEPA has been published by the Secretary or BLM, we must assume the DEIS is all the federal government proposes in the way of NEPA compliance, as to the potential National Monument

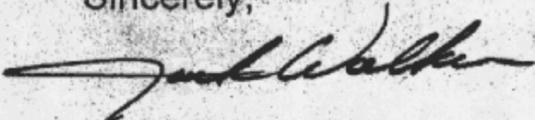
designation. We therefore must use these comments to address NEPA in that context.

The DEIS and process leading to it are inadequate for NEPA purposes, for several reasons. First, the DEIS does not disclose the contemplated boundaries of the potential designation. Second, the management of any designated monument is not discussed, nor are the environment, social, human and economic impacts of such a designation. Third, alternatives to the contemplated designation (as to size, management, etc.) receive no discussion. Fourth, there has been no organized method for public input into the merits of such a designation; §202(c)(9) of FLPMA requires the BLM to involve local and state government early in the development of decisions affecting land use, which such a designation surely would do. There should be early and timely notice, and a meaningful forum for those governmental entities to express their views.

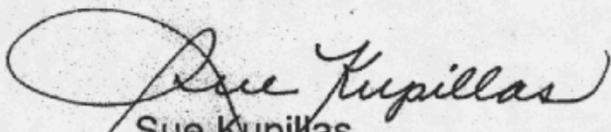
Generally, all our comments above would seem to apply to a potential National Monument designation. It is impossible to comment more precisely for the simple reason that the Secretary has announced no formal proposal.

For these reasons, the Board of Commissioners of Jackson County opposes the designation of any part of the study area as a National Monument, unless and until scoping, public hearings and input, and all other steps of a proper NEPA process have occurred.

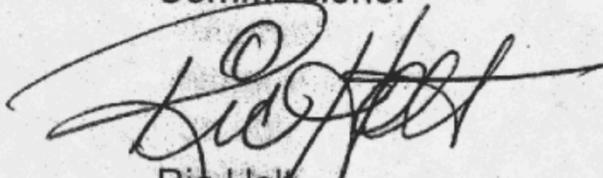
Sincerely,



Jack Walker, Chair
Jackson County Board of Commissioners



Sue Kupillas
Commissioner



Ric Holt
Commissioner

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State of California - The Resources Agency

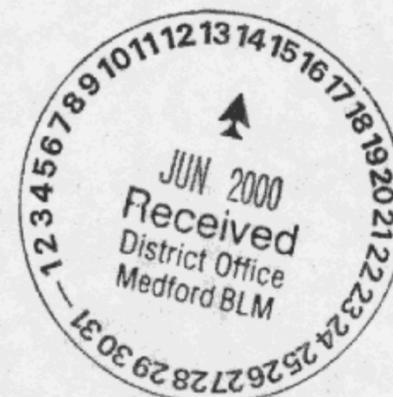
CRAY DAVIS, Governor

DEPARTMENT OF FISH AND GAME

<http://www.dfg.ca.gov>

601 Locust Street
 Redding, CA 96001
 (530) 225-2300

June 14, 2000



Mr. Tom Sensenig, Team Leader
 Cascade Siskiyou Ecological Emphasis Area
 Bureau of Land Management
 3040 Biddle Road
 Medford, Oregon 97504

Dear Mr. Sensenig:

**Draft Management Plan and Environmental Impact Statement (DMP/DEIS)
 Cascade Siskiyou Ecological Emphasis Area (CSEEA)**

Thank you for the opportunity to review the DMP/DEIS for the CSEEA. We are interested in this proposal with respect to its implications for the maintenance, protection and enhancement of natural resources and public recreational opportunities in California.

With respect to the CSEEA in California, the DEIS addresses only boundary issues regarding public lands existing within or adjacent to the Klamath-Iron Gate, Cottonwood Creek and the Jenny Creek watersheds. This area encompasses the Horseshoe Ranch Wildlife Area and the Jenny Creek ACEC/RNA identified in the 1993 Redding Resource Management Plan (RRMP). Management activities specific to these areas will be addressed in a future resource management plan amendment.

The Department of Fish and Game (DFG) has been concerned about the loss of public recreational opportunity in Siskiyou County in recent years. Our concern was mitigated by features of the current RRMP that provides for the acquisition of lands including property adjacent to the Horseshoe Ranch Wildlife Area from willing sellers. Several alternatives in the DEIS, including the preferred alternative, would significantly alter this direction and would severely limit the potential for expansion of these lands in Siskiyou County. Public use at the Horseshoe Ranch Wildlife Area is increasing and habitat projects completed on the area have resulted in improved habitat conditions for wildlife. Therefore, we believe it is important that the CSEEA provide direction to acquire lands adjacent to the Horseshoe Ranch Wildlife Area and Jenny Creek ACEC/RNA as willing sellers become available.

The DEIS describes four alternatives for lands in the CSEEA within California. With respect to the boundaries described under these alternatives, the DFG recommends the adoption of Alternative D. This alternative would maximize the size of the Horseshoe Ranch Wildlife Area and the Jenny Creek ACEC/RNA by acquiring unimproved privately owned land from willing sellers. This area provides significant winter range for mule deer and contains important habitat for a wide variety of wildlife.

Conserving California's Wildlife Since 1870

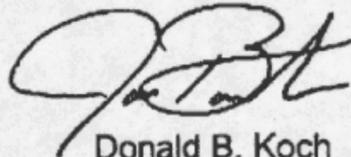
Mr. Tom Sensenig
June 14, 2000
Page Two

Although the DEIS does not address the management of lands within the proposed CSEEA in California, I would like to reiterate some of our recommendations prepared in response to your September 8, 1999, scoping letter. They were as follows: (1) management activities within the CSEEA should be designed to maintain and enhance deer winter range where it occurs, (2) continue to provide nonmotorized recreational opportunities on the Horseshoe Ranch Wildlife Area including hunting and fishing, (3) fire should be used as a management tool to maintain and improve vegetation health and diversity and (4) continue to cooperatively manage the Horseshoe Ranch Wildlife Area under the existing September 16, 1981, memorandum between the DFG and Bureau of Land Management.

Recreational opportunities within the Horseshoe Ranch Wildlife Area and surrounding public lands are important to the DFG and the public due to the exceptional hunting, fishing, camping, hiking and other recreational uses this area currently provides. We will continue to participate in the development of the RRMP amendment as needed with respect to these issues.

If you have any questions regarding our recommendations on the DEIS or require additional information, please feel free to contact Senior Wildlife Biologist Supervisor Tim Burton at (530) 225-2305.

Sincerely,



Donald B. Koch
Regional Manager

cc: Mr. Tim Burton
Department of Fish and Game
601 Locust Street
Redding, California 96001

Mr. Chuck Schultz
Redding Resource Area
Bureau of Land Management
355 Hemsted Road
Redding, California 96002



COUNTY OF SISKIYOU

Board of Supervisors

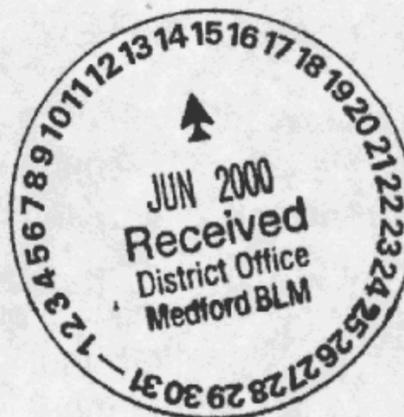
P.O. Box 338 • 311 Fourth Street
Yreka, California 96097

(530) 842-8081
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000758

June 6, 2000

Tom Sensenig
BLM CSEEA Team Leader
3040 Biddle Road
Medford, OR 97504



Dear Sir:

Subject: Comment on the Draft Management Plan and Environmental Impact Statement (DEIS) for the Cascade Siskiyou Ecological Emphasis Area

The Board has great reservation and concern regarding the Draft Management Plan/Draft Environmental Impact Statement for the Cascade Siskiyou Ecological Emphasis Area (CSEEA). As you are aware, the Draft CSEEA Management Plan identifies lands within Siskiyou County for possible inclusion. BLM-Medford supports inclusion of over 9,000 acres as outlined in their Preferred Alternative "C." The Board considers the ramifications of the Draft Management Plan, DEIS, and Preferred Alternative to Siskiyou County and its constituents to be significant and adverse.

Having reviewed the DEIS, we are discouraged to learn that the socio-economic impacts of Plan implementation on Siskiyou County have not been addressed. The analysis appears to have stopped abruptly at the state line, ignoring California lands which the Preferred Alternative includes (page 91 of the DEIS indicates the CSEEA "does not extend east into Klamath County or south to Siskiyou County, California"). The Jackson County Board of Commissioners was consulted; however, the Siskiyou County Board of Supervisors was not. In fact, nowhere in the DEIS are impacts analyzed across the state line. Selection of the Preferred Alternative would be a violation of NEPA.

A single page is devoted to ranching interests. While the analysis included in the DEIS provides a broad look at economic values, it fails to address specific interests of the individuals most dramatically impacted by any decision. It is our belief that individual families will be confronted with insurmountable economic hardships resulting from grazing and timber harvest restrictions. Throughout the document reference is made to BLM's desire to control, reduce, curtail, or eliminate grazing opportunities. Similar activity such

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Page 2 of 3
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as timber harvest and recreation, although less economically significant, are not adequately analyzed for their social and economic merits to permittees and leaseholders.

Siskiyou County prides itself on its history as a frontier county. We are blessed with myriad natural resources, resources which are becoming increasingly regulated through the rationale of "better" management. Unfortunately, recent history has demonstrated that such "enhanced" management techniques typically result in blanket use constraints, constraints which bear directly upon the local community and its economy and which are not rooted in science. Analysis is needed and required to determine whether the benefits truly outweigh the costs and whether there is any potential for a regulatory taking.

While this Board ardently supports wise, sustainable resource use, we cannot overlook the paramount importance of the values these resources provide to our heritage and economic well-being. Should BLM or any other governmental agency find it necessary to consider amendments to public lands management practices, it is absolutely crucial to analyze the fiscal and social ramifications such decisions may bear upon the public most directly influenced by those decisions.

The DEIS goes into considerable detail regarding management practices for each of the Alternatives identified; however, while the DEIS addresses the inclusion of the Horseshoe Ranch and Jenny Creek areas in California, it specifically, as stated in its introduction, will not address management activities in those areas. Rather, such management decisions will be left to the Redding office of the BLM. This tactic appears to undermine the NEPA process. We question how BLM may consider identification and selection of lands for inclusion in the plan, yet neglect to address management activities. The sole purpose of the DEIS is to analyze and select management activities most suited to the area being studied. If the proposed action for the lands in California is only to make a boundary line adjustment, BLM needs to identify this action in the sections on purpose and need, and proposed agency action or decision.

As we have stated in prior correspondence to BLM on this issue, the plan itself points to the need for jurisdictional separation. The deference to Redding BLM seems to coincide with our desires. California should not be lumped together with Oregon for the sole purpose (as far as our records shows) of mollifying those who desire stricter governmental control, reduced resource use, and expanded public lands.

The DEIS is replete with citations stating potential expansion of federal lands will be limited to willing land owners. The document neglects to examine the effects of new resource-use regulations which may have a direct influence on neighboring owners. In essence,

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 Page 3 of 3
 June 6, 2000

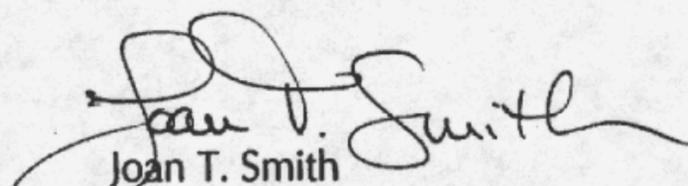
implementation of new resource protection prescriptions will likely force adjacent landowners to become willing sellers, a position perhaps contrary to their own desires but fiscally prudent. We believe this impact must merit consideration in the EIS.

This Board recognizes the potential for National Monument designation of the Soda Mountain area and recognizes that portions of Siskiyou County are also being considered for inclusion. We view this potential action as a threat to our institution; a threat because it would undermine the public trust we've all worked so hard to build and maintain. Further, we understand that National Monument designation would disregard science in a cloaked attempt to gain political favor from a vocal minority, a minority who, for the most part, resides elsewhere. We urge that you assert these same concerns on this topic as well. We feel it would be negligent to proceed with such action, ignoring the vast time and fiscal resources (both public and private) in developing a management plan for this region. It would be a clear "thumbing of Federal bureaucratic noses" rendering all previous efforts futile. We ask you to take a strong professional stand against arbitrary designation.

It is imperative that BLM address any private land acquisition that are contemplated, and we wish to remind you of our strong concern over the resulting depletion of the County's tax base. Adequate PILT compensation must be made to ensure no net loss to our property tax base.

Thank you for the opportunity provide comment. We hope you modify your Management Plan and DEIS to reflect our comments. Should you have any questions or wish to have additional input, please contact us.

Sincerely,



Joan T. Smith
 Chair, Board of Supervisors

WV/wv

cc: Senator Dianne Feinstein
 Senator Barbara Boxer
 Representative Wally Herger
 Elaine Zielinski, Oregon BLM Director
 Al Wright, California BLM Director

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IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Yreka Fish and Wildlife Office

1829 So. Oregon Street

Yreka, California 96097

(530) 842-5763 Fax: (530) 842-4517

June 14, 2000

1-11-00-TA-17

Memorandum

To: Tom Sensenig, CSEEA Team Leader, Bureau of Land Management
Medford, Oregon

From: Project Leader, Yreka Fish and Wildlife Office
Yreka, California

Subject: Cascade Siskiyou Ecological Emphasis Area Draft Management Plan/Environmental
Impact Statement Review

The Yreka Fish and Wildlife Office of the U.S. Fish and Wildlife Service (Service) appreciates the opportunity to review and comment on the Cascade Siskiyou Ecological Emphasis Area (CSEEA) Draft Management Plan/Environmental Impact Statement. The document states that the guiding principle for management of the CSEEA is to maintain, protect, restore, or enhance relevant and important cultural, biological, and ecological resource values. Especially because of the area's high degree of species diversity and endemism, we fully support this objective for the CSEEA. In addition, this goal is very important in accomplishing the recovery of two species that are listed under the Endangered Species Act, of 1973, *as amended* (Act), the federally listed threatened northern spotted owl (*Strix occidentalis caurina*) and the endangered Gentner's fritillary (*Fritillaria gentneri*). While the document states that the underlying premise of each alternative is to "maintain, protect, restore, or enhance relevant and important ecological and biological value(s)", we disagree that this objective can be accomplished without greater focus on control of introduced and exotic weeds and the use of prescribed fire in all alternatives. In some alternatives, grazing may be incompatible with the above goal.

General Comments:

The Draft Management Plan/Environmental Impact Statement for the CSEEA (DEIS) does not provide sufficient information to evaluate Alternative A, the existing condition, especially in terms of introduced vegetation. The baseline established in the DEIS is based on the severely degraded condition of many of the habitats after 100 years of overgrazing (DEIS Volume 1 page 18 and Appendix A Volume 2). The Bureau of Land Management (BLM) was directed to assess grazing allotments and assign ratings for the ecological potential and capability of each site (Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Public lands Administered by the BLM the States of Oregon and Washington, 1997). The ecological

Tom Sensenig, CSEEA Team Leader

potential and capability as described in this 1997 document would provide a better baseline to assess the impacts of proposed alternatives than does the current baseline presented in the DEIS. The Service recommends that the BLM provide the ecological potential and capacity of the grazing allotments and the current status of each allotment as rated against this baseline.

The CSEEA is described in the DEIS as an area of national importance due to its biological diversity, in particular the botanical resources, and the CSEEA should be managed to recover these these resources and prevent degradation of their habitat. The BLM has been directed in Section 302(b) of the Federal Land Policy and Management Act of 1976 to "take any action necessary to prevent unnecessary or undue degradation of the lands (43USC 1732(b)). Section 2(b) of the public Rangelands Improvement Act of 1978 adds that the BLM will "Manage, maintain, and improve the condition of the public rangelands so that they become as productive as feasible..." (43 USC1901(b)(2)). The Fundamentals of Rangeland Health as stated in 43 CFR 4180 number 4, state that "Habitats are, or are making significant progress toward being, restored or maintained for Federal threatened and endangered species, Federal Proposed, Category 1 and 2 Federal candidate and other special status species". Further, BLM Manual 6840.06C directs BLM to take no action which may further the need to list species under the Endangered Species Act (ESA).

One of the greatest environmental threats facing these native plant species and their ecosystems in the western U.S. is the continued introduction and spread of nonindigenous plants (noxious weeds) (Belsky and Gelbard 2000). Recent research is persuasive in showing that livestock significantly increase invasions by nonindigenous plants in the these (Belsky and Gelbard 2000). The DEIS, however, is not consistent in addressing livestock grazing as an important factor in the establishment and spread of nonindigenous plants. Alternatives A, B, C, and E continue to graze livestock, thus degrading range and habitat conditions and furthering the need to list native plants and wildlife under the ESA. Alternative B will increase the amount of grazing which would exacerbate the problem and threaten the biological diversity of the area. The Service recommends that the BLM develop an Alternative between C and D which would decrease or eliminate livestock grazing and implement an aggressive noxious weed control program with all methods such as fire, mechanical manipulation, and herbicide application which provide non-selective controls.

Alternative C Pages 186- 188 Table 3-3. Many of the objectives to be accomplished by prescribed livestock use are not realistic and are based on incorrect assumptions. Objectives that call for intensive grazing for short periods of time during the spring to remove annual grass or other weeds and to prepare the seed bed would compact damp soil. According to the literature (Belsky and Gelbard 2000), soil disturbed in this manner favors the establishment and spread of annual grasses and noxious weeds, not native bunch grasses. One objective proposes to use cattle to restore riparian plant communities (DEIS page 188). However, the literature indicates that livestock exclusion has consistently resulted in the most dramatic and rapid rates of ecosystem recovery (Vavra et al. 1994). Objectives (DEIS page 188) also suggest that livestock grazing

Tom Sensenig, CSEEA Team Leader

could be used to replace fire. However in reality cattle are selective grazers and will remove the nutritional forage first (usually native grasses and forbs) and will only remove weeds such as star-thistle and medusahead after all other vegetation is gone, again a process that favors noxious weeds, and does not mimic the effects of fire.

These objectives do not seem to consider the effects of native grazers. The native species of grazers which evolved with the native grasses are still present and would probably resume their natural migrations and use of vegetation if livestock were removed from the area. Riparian areas and wetlands are extremely important for calving and fawning for deer and elk. Cattle that are allowed to graze in these areas in the spring compete for forage and displace calving and fawning deer and elk, increasing the potential for predation and decreasing the overall fitness of the does, cow elk and their offspring. Finally, on page 283 of the DEIS it is stated that "Alternatives C and D would be presumed to eliminate public land grazing because of additional restrictions. It is worth noting that the use of grazing to accomplish resource management objectives, called for in Alternatives C and D, is unlikely to occur". If these alternatives are not expected to be feasible, the BLM should develop an alternative that does not include grazing to accomplish the goals of alternative C and D.

Northern Spotted Owl Recovery. Both the critical habitat designation for the northern spotted owl under the Act (57 FR 1796) and the Northwest Forest Plan depend on protection of late successional forest habitat in the area of the CSEEA to recover this species. The designation of critical habitat unit, OR-38, and the Jenny Creek Late Successional Reserve (Northwest Forest Plan), are important to maintaining genetic exchange between spotted owl populations in the Oregon and California Cascades and the Klamath Mountains Provinces. Indeed, the document states that there is evidence of such genetic exchange between populations to the north, east, and west of the CSEEA. The document also states that currently there are 13,588 acres (26%) of habitat that is suitable for northern spotted owl nesting, roosting, or foraging. The DEIS identifies an additional 12,605 acres (24%) on Federal lands within the CSEEA that has the potential to become suitable northern spotted owl habitat. Management of such habitat for the benefit of northern spotted owls represents a unique opportunity to recover the species in Northern California and Southern Oregon. As you are aware, the Act requires all Federal agencies to assist in the recovery of listed wildlife and plants. Therefore, alternatives that encourage increased timber harvest or grazing practices that lead to increased risk of stand-replacing fire in forested habitat (see specific comment below) should be avoided.

Gentner's Fritillary Protection. While a recovery strategy for Gentner's fritillary has not yet been developed, the final rule (64 FR 69195) listing this species as endangered identifies fire suppression as one important threat to the species. Fire suppression results in the conversion of oak woodland with a grassy understory, *F. gentneri's* preferred habitat, to oak woodland with a shrub understory, thereby excluding the species. Introducing prescribed fire would help to restore oak woodlands with grassy understories and therefore, may represent an important tool that could be used to recover this endangered species, as well as many other species that are native to this

Tom Sensenig, CSEEA Team Leader

traditional oak woodland vegetation community. In addition, control of yellow star-thistle (*Centaurea solstitialis*) and other introduced weed species before they become a direct threat to the single population of *F. gentneri* that is known to occur within the CSEEA, is very important.

Specific Comments:

Page 37: The first sentence in the second paragraph states that the Service considers the redband trout to be a sensitive species. On March 20, 2000, the Service published a 12-month finding that listing the Great Basin redband trout (*Oncorhynchus mykiss* ssp.) as threatened or endangered is not warranted at this time. In addition, this 12-month finding addressed only redband trout populations in Catlow, Fort Rock, Harney, Goose Lake, Warner, and Chewaucan Basins. Although, the redband trout in the Jenny Creek watershed are physically isolated from other populations and may indeed be a distinct genetic group, they do not enjoy any Federal protective status under the Act at this time.

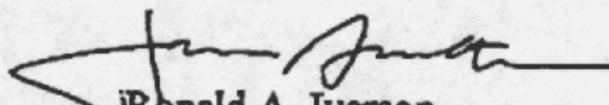
Page 52-53: Table 2-8, describes the actions that must be taken to protect seeps, springs, and stream-side vegetation in the CSEEA. Table 2-9 predicts the trends for such wetlands under each proposed alternative. Since the Northwest Forest Plan requires that wetlands be protected under the Aquatic Conservation Strategy, why don't all alternatives show the same trend of steadily increasing improvement?

Page 62: The second paragraph does not mention livestock grazing as a forest disturbance agent. Belsky and Blumenthal (1997) have postulated that livestock grazing reduces the biomass and density of grasses and sedges, thereby reducing competition with conifer seedlings. This reduction in competition by grasses and sedges leads to denser tree recruitment. The change in forest structure and resulting species composition change often leads to increased fire hazard.

Page 74: Please include a map of critical habitat unit OR-38, and other surrounding critical habitat units in an appendix.

Appendices: Please make sure references to specific appendices match each lettered appendix found in Volume II.

Again, we appreciate the opportunity to comment. Should you have any questions about these comments please contact Cliff Oakley or Nadine R. Kanim of this office.


Ronald A. Iverson
Project Leader

Tom Sensenig, CSEEA Team Leader

cc: California/Nevada Operations Office, Sacramento, CA, Attn: J. Engbring
Oregon State Office, Portland, OR, Attn: N. Lee
Klamath Falls FWO, Klamath Falls, OR
AFWO-HCP, Attn: P. Detrich
KFFWO, Attn: Jean Elder

Literature Cited:

Belsky, A.J. and D.M. Blumenthal. 1997. Effects of livestock grazing on stand dynamics and soils in upland forests of the Interior West. *Conservation Biology* 11(2):315-327.

Belsky, A.J. and J.L. Gelbard. 2000. Livestock Grazing and Weed Invasions in the Arid West. A Scientific Report Published by the Oregon Natural Desert Association.

Vavra, M., W.A. Laycock, and R.D. Pieper. 1994. Ecological Implications of Livestock Herbivory in the West, Society of Range Management Denver, CO.

Appendix Y - Aquatic Macroinvertebrates in the CSNM

Table AY-1: Aquatic macroinvertebrates in Dutch Oven Creek (orders, families, and subfamilies are in normal text; genera or species are italicized)		
<p><u>Non-Insects</u> Hydrobiidae Oligochaeta</p> <p><u>Ephemoptera:</u> <i>Ameletus sp.</i> <i>Baetis tricaudatus</i> <i>Cinygmula sp.</i> <i>Drunella doddsi</i> <i>Ephemeralla inermis/infrequens</i> <i>Ironodes sp.</i> <i>Paraleptophlebia sp.</i></p> <p><u>Plecoptera:</u> <i>Calineuria californica</i> Capniidae <i>Isoperla sp.</i> <i>Malenka sp.</i> <i>Pteronarcella sp.</i> <i>Sweltsa sp.</i> <i>Yoraperla brevis</i> <i>Zapada cinctipes</i> <i>Zapada columbiana</i> <i>Zapada Oregonensis Gr.</i></p>	<p><u>Trichoptera:</u> <i>Agapetus sp.</i> <i>Apatania sp.</i> <i>Ecclisomyia sp.</i> <i>Glossosoma sp.</i> <i>Gumaga sp.</i> <i>Heteroplectron californicum</i> <i>Hydropsyche sp.</i> <i>Lepidostoma sp.</i> <i>Neophylax splendens</i> <i>Neothremma sp.</i> <i>Parapsyche almota</i> <i>Pseudostenophylax edwardsi</i> <i>Rhyacophila sp.</i> <i>Rhyacophila hyalinata Gr.</i> <i>Rhyacophila iranda Gr.</i> <i>Rhyacophila narvae</i> <i>Rhyacophila grandis</i></p> <p><u>Coleoptera:</u> <i>Eubrianax edwardsi</i> <i>Heterlimnius sp.</i> Hydrophilidae <i>Narpus sp.</i> <i>Zaitzevia sp.</i></p> <p><u>Megaloptera:</u> Corydalidae</p>	<p><u>Diptera:</u> <i>Dixa sp.</i> <i>Meringodixa sp.</i> Simuliidae <i>Dicranota sp.</i> Forcipomyiinae</p> <p><u>Chironomidae:</u> Chironomidae (pupae) <i>Brilla sp.</i> <i>Corynoneura sp.</i> <i>Diamesa sp.</i> <i>Micropsectra sp.</i> Orthocladiinae <i>Orthocladius complex</i> <i>Pagastia sp.</i> <i>Paramerina sp.</i> <i>Parametriocnemus sp.</i> <i>Paratrissocladius sp.</i> <i>Rheotanytarsus sp.</i> <i>Synorthocladius sp.</i> <i>Thienemanniella sp.</i> <i>Tvetenia sp.</i></p>

Samples were collected in erosional, detrital, and margin habitat found at DOVN on October 7, 1993 (Aquatic Biology Associates 1993).

Table AY-2. Aquatic Macroinvertebrates in Keene Creek

(orders, families, and subfamilies are in normal text; genera or species are italicized)

<p><u>Non-Insects</u></p> <p>Acari</p> <p>Copepoda</p> <p>Hydrobiidae</p> <p><i>Juga sp.</i></p> <p>Lymnaeidae</p> <p>Oligochaeta</p> <p><i>Physella sp.</i></p> <p>Planorbidae</p> <p>Turbellaria</p> <p><u>Ephemoptera:</u></p> <p><i>Ameletus sp.</i></p> <p><i>Baetis tricaudatus</i></p> <p><i>Caudatella hystrix</i></p> <p><i>Cinygmula sp.</i></p> <p><i>Drunella doddsi</i></p> <p><i>Drunella grandis/spinifera</i></p> <p><i>Epeorus sp.</i></p> <p><i>Ephemeralla inermis/infrequens</i></p> <p><i>Ironodes sp.</i></p> <p><i>Paraleptophlebia sp.</i></p> <p><i>Paraleptophlebia bicornuta</i></p> <p><i>Rhithrogena sp.</i></p> <p><u>Plecoptera:</u></p> <p><i>Calineuria californica</i></p> <p>Capniidae</p> <p><i>Hesperoperla pacifica</i></p> <p><i>Isoperla sp.</i></p> <p>Perlodidae</p> <p><i>Skwala sp.</i></p> <p><i>Yoraperla brevis</i></p> <p><i>Zapada cinctipes</i></p> <p><i>Zapada columbiana</i></p> <p><i>Zapada oregonensis Gr.</i></p>	<p><u>Trichoptera:</u></p> <p><i>Agapetus sp.</i></p> <p><i>Apatania sp.</i></p> <p><i>Arctopsyche grandis</i></p> <p><i>Ecclisomyia sp.</i></p> <p><i>Glossosoma sp.</i></p> <p><i>Gumaga sp.</i></p> <p><i>Heteroplectron californicum</i></p> <p><i>Hydropsyche sp.</i></p> <p><i>Hydroptila sp</i></p> <p><i>Lepidostoma sp..</i></p> <p><i>Micrasema sp.</i></p> <p><i>Neophylax sp.</i></p> <p><i>Neophylax occidentis</i></p> <p><i>Neophylax rickeri</i></p> <p><i>Onocosmoecus unicolor</i></p> <p><i>Pseudostenophylax edwardsi</i></p> <p><i>Psycoglypha bella</i></p> <p><i>Rhyacophila betteni Gr.</i></p> <p><i>Rhyacophila brunnea Gr.</i></p> <p><i>Rhyacophila coloradensis Gr.</i></p> <p><u>Coleoptera:</u></p> <p><i>Apumixis dispar</i></p> <p><i>Cleptelmis sp.</i></p> <p><i>Eubrianax edwardsi</i></p> <p><i>Heterlimnius sp.</i></p> <p>Hydrophilidae</p> <p><i>Optioservus sp.</i></p> <p><u>Megaloptera:</u></p> <p>Corydalidae</p> <p><u>Odonata:</u></p> <p><i>Argia sp.</i></p> <p>Coenagrionidae</p>	<p><u>Diptera:</u></p> <p><i>Antocha sp.</i></p> <p>Ceratopogoninae</p> <p><i>Chelifera sp.</i></p> <p><i>Dicranota sp.</i></p> <p><i>Dixa sp.</i></p> <p><i>Hexatoma sp.</i></p> <p><i>Meringodixa sp.</i></p> <p>Simuliidae</p> <p><u>Chironomidae:</u></p> <p><i>Brillia sp.</i></p> <p>Chironomidae (pupae)</p> <p><i>Corynoneura sp.</i></p> <p><i>Diamesa sp.</i></p> <p><i>Eukiefferiella sp.</i></p> <p><i>Macropelopia sp.</i></p> <p><i>Micropsectra sp.</i></p> <p>Orthoclaadiinae</p> <p><i>Orthocladius complex</i></p> <p><i>Pagastia sp.</i></p> <p><i>Paramerina sp.</i></p> <p><i>Parametriocnemus sp.</i></p> <p><i>Pentaneura sp.</i></p> <p><i>Phaenopsectra sp.</i></p> <p><i>Polypedilum sp.</i></p> <p><i>Rheotanytarsus sp.</i></p> <p><i>Stempellinella sp.</i></p> <p><i>Symposiocladius sp.</i></p> <p><i>Synorthocladius sp.</i></p> <p><i>Thienemannimyia sp.</i></p> <p><i>Tvetenia sp.</i></p>
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Samples were collected in erosional, detrital, and margin habitat found at **BXDW on October 7, 1993** (Aquatic Biology Associates 1993).

Table AY-3. Aquatic Macroinvertebrates in Beaver Creek

(orders, families, and subfamilies are in normal text; genera or species are italicized)

<p><u>Non-Insects</u> Acari Copepoda Hydrobiidae Oligochaeta</p> <p><u>Ephemoptera:</u> <i>Ameletus sp.</i> <i>Baetis tricaudatus</i> <i>Cinygmula sp.</i> <i>Dipheter hageni</i> <i>Ephemerella inermis/infrequens</i> <i>Ironodes sp.</i> <i>Paraleptophlebia sp.</i></p> <p><u>Plecoptera:</u> Capniidae <i>Hesperoperla pacifica</i> <i>Isoperla sp.</i> <i>Malenka sp.</i> <i>Zapada cinctipes</i> <i>Zapada oregonensis Gr.</i></p>	<p><u>Trichoptera:</u> <i>Arctopsyche grandis</i> <i>Glossosoma sp.</i> <i>Hydropsyche sp.</i> <i>Hydroptila sp</i> <i>Lepidostoma sp.</i> <i>Micrasema sp.</i> <i>Parapsyche elsis</i> <i>Rhyacophila sp.</i> <i>Rhyacophila betteni Gr.</i> <i>Rhyacophila iranda Gr.</i> <i>Rhyacophila rotunda Gr.</i></p> <p><u>Coleoptera:</u> <i>Apumixis dispar</i> <i>Cleptelmis sp.</i> <i>Heterlimnius sp.</i> Hydrophilidae <i>Lara avara</i> <i>Zaitzevia sp.</i></p> <p><u>Odonata:</u> <i>Argia sp.</i> <i>Enallagma/Ischnura sp.</i> <i>Octogomphus sp.</i></p>	<p><u>Diptera:</u> Ceratopogoninae <i>Chelifera sp.</i> <i>Dicranota sp.</i> <i>Hemerodromia sp.</i> <i>Limnophora sp.</i> Simuliidae <i>Tipula sp.</i></p> <p><u>Chironomidae:</u> Chironomidae (pupae) <i>Boreochlus sp.</i> <i>Corynoneura sp.</i> <i>Cricotopus nostococladus</i> <i>Eukiefferiella sp.</i> <i>Lauterborniella sp.</i> <i>Micropsectra sp.</i> Orthoclaadiinae <i>Orthocladus complex</i> <i>Pagastia sp.</i> <i>Paramerina sp.</i> <i>Parametriocnemus sp.</i> <i>Paratrissocladius sp.</i> Pentaneurini <i>Thienemannimyia sp.</i> <i>Tvetenia sp.</i></p>
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Samples were collected in erosional and detrital habitat found at BVRL on October 7, 1993 (Aquatic Biology Associates 1993).

Table AY-4. Aquatic Macroinvertebrates in Corral Creek

(orders, families, and subfamilies are in normal text; genera or species are italicized)

<u>Non-Insects</u>	<u>Trichoptera:</u>	<u>Diptera:</u>
Acari	<i>Hesperophylax sp.</i>	<i>Antocha sp.</i>
Oligochaeta	<i>Heteroplectron californicum</i>	Ceratopogoninae
Ostracoda	<i>Hydropsyche sp.</i>	<i>Chelifera sp.</i>
<i>Physella sp.</i>	<i>Hydroptila sp.</i>	<i>Clinocera sp.</i>
<u>Ephemoptera:</u>	<i>Lepidostoma sp.</i>	<i>Dixa sp.</i>
<i>Baetis tricaudatus</i>	<i>Micrasema sp.</i>	<i>Hemerodromia sp.</i>
<i>Cinygmula sp.</i>	<i>Rhyacophila sp.</i>	Simuliidae
<i>Dipheter hageni</i>	<i>Rhyacophila bettini Gr.</i>	<u>Chironomidae:</u>
<i>Ephemeralla inermis/infrequens</i>	<i>Rhyacophila hyalinata Gr.</i>	<i>Brillia sp.</i>
<i>Paraleptophlebia sp.</i>	<u>Coleoptera:</u>	Chironomidae (pupae)
<u>Plecoptera:</u>	<i>Ampumixis dispar</i>	Chironomini
Capniidae	<i>Cleptelmis sp.</i>	<i>Corynoneura sp.</i>
<i>Isoperla sp.</i>	<i>Optioservus sp.</i>	<i>Eukiefferiella sp.</i>
<i>Zapada cinctipes</i>	<i>Zaitzeva sp.</i>	<i>Macropelopia sp.</i>
		<i>Micropsectra sp.</i>
		<i>Microtendipes sp.</i>
		Orthocladiinae
		<i>Orthocladius complex</i>
		<i>Pagastia sp.</i>
		<i>Parametriocnemus sp.</i>
		<i>Paramerina sp.</i>
		<i>Pentaneura sp.</i>
		<i>Phaenopsectra sp.</i>
		<i>Rheocricotopus sp.</i>
		<i>Rheotanytarsus sp.</i>
		Tanytarsini
		<i>Thienemanniella sp.</i>
		<i>Thienemannimyia sp.</i>
		<i>Tvetenia sp.</i>

Samples were collected in erosional, and detrital habitat found at CRLI on October 7, 1993 (Aquatic Biology Associates 1993).

Table AY- 5. Aquatic Macroinvertebrates in Jenny Creek

(orders, families, and subfamilies are in normal text; genera or species are italicized)

<p><u>Non-Insects</u></p> <p>Acari</p> <p><i>Ferrissia sp.</i></p> <p><i>Hyalella azteca</i></p> <p><i>Juga sp.</i></p> <p>Nematoda</p> <p>Oligochaeta</p> <p>Ostracoda</p> <p><i>Pacifasticus sp.</i></p> <p><i>Physella sp.</i></p> <p>Sphaeriidae</p> <p>Turbellaria</p> <p><u>Ephemoptera:</u></p> <p><i>Acentrella sp.</i></p> <p><i>Acentrella turbida</i></p> <p><i>Baetis tricaudatus</i></p> <p><i>Callibaetis sp.</i></p> <p><i>Centroptilum sp.</i></p> <p><i>Cinygmula sp.</i></p> <p><i>Dipheter hageni</i></p> <p><i>Epeorus sp.</i></p> <p><i>Heptagenia/Nixe sp.</i></p> <p><i>Isonychia sp.</i></p> <p><i>Rhrithrogena sp.</i></p> <p><i>Tricorythodes minutus</i></p> <p><u>Plecoptera:</u></p> <p><i>Calineuria californica</i></p> <p><i>Hesperoperla pacifica</i></p> <p><i>Pteronarcys sp.</i></p> <p><i>Pteronarcys californica</i></p> <p>Taeniopterygidae</p> <p><i>Taeniopteryx sp.</i></p> <p><i>Zapada cinctipes</i></p>	<p><u>Trichoptera:</u></p> <p><i>Glossosoma sp.</i></p> <p><i>Hesperophylax sp.</i></p> <p><i>Hydropsyche sp.</i></p> <p><i>Rhyacophila sp.</i></p> <p><i>Rhyacophila coloradensis Gr.</i></p> <p><u>Coleoptera:</u></p> <p><i>Duberaphia sp.</i></p> <p><i>Eubrianax edwardsi</i></p> <p><i>Microcylloepus sp.</i></p> <p><i>Optioservus sp.</i></p> <p><i>Zaitzeva sp.</i></p> <p><u>Lepidoptera:</u></p> <p><i>Petrophila sp.</i></p> <p><u>Odonata:</u></p> <p><i>Aeshna sp.</i></p> <p><i>Argia sp.</i></p> <p><i>Enallagma/ishnura sp.</i></p>	<p><u>Diptera:</u></p> <p><i>Antocha sp.</i></p> <p><i>Brachycera sp.</i></p> <p><i>Dixa sp.</i></p> <p>Ephydriidae</p> <p><i>Hemerodromia sp.</i></p> <p><i>Limnophora sp.</i></p> <p><i>Limonia sp.</i></p> <p>Simuliidae</p> <p>Tipulidae</p> <p><u>Chironomidae:</u></p> <p><i>Brillia sp.</i></p> <p>Chironomidae (pupae)</p> <p><i>Chaetocladius sp.</i></p> <p><i>Coryoneura sp.</i></p> <p><i>Cricotopus sp.</i></p> <p><i>Diamesa sp.</i></p> <p><i>Einfeldia sp.</i></p> <p><i>Eukiefferiella sp.</i></p> <p>Orthoclaadiinae</p> <p><i>Orthoclaadius complex</i></p> <p><i>Parametriocnemus sp.</i></p> <p><i>Paratrichoclaadius sp.</i></p> <p><i>Pentaneura sp.</i></p> <p><i>Polypedilum sp.</i></p> <p><i>Rheocricotopus sp.</i></p> <p><i>Rheotanytarsus sp.</i></p> <p><i>Synorthoclaadius sp.</i></p> <p><i>Thienemannimyia sp.</i></p> <p><i>Tvetenia sp.</i></p>
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In 1991, samples were collected at LWRX on October 9, 1991 in erosional habitat only. In 1995, samples were collected in erosional, margin, and macrophyte habitats found and October 10, 1995 (Aquatic Biology Associates 1991, 1995).

Table AY-6. Aquatic Macroinvertebrates in Jenny Creek
 (orders, families, and subfamilies are in normal text; genera or species are italicized)

<p><u>Non-Insects</u> Acari <i>Feressia sp.</i> <i>Hyallela azteca</i> <i>Juga sp.</i> Oligochaeta Ostracoda <i>Pacifasticus sp.</i> <i>Physella sp.</i> Planorbidae Turbellaria</p> <p><u>Ephemoptera:</u> <i>Acentrella turbida</i> <i>Baetis tricaudatus</i> <i>Epeorus sp.</i></p> <p><u>Plecoptera:</u> <i>Taeniopteryx</i></p>	<p><u>Trichoptera:</u> <i>Glossosoma sp.</i> <i>Hydropsyche sp.</i> <i>Micrasema sp.</i> <i>Rhyacophila coloradensis Gr.</i> <i>Rhyacophila hyalinata Gr.</i></p> <p><u>Coleoptera:</u> <i>Cleptelmis sp.</i> <i>Optioservus sp.</i> <i>Zaitzeva sp.</i></p> <p><u>Odonata:</u> <i>Argia sp.</i></p>	<p><u>Diptera:</u> <i>Antocha sp.</i> <i>Hemerodromia sp.</i> <i>Maruina sp.</i> Simuliidae</p> <p><u>Chironomidae:</u> Chironomidae (pupae) <i>Cardiocladius sp.</i> <i>Diamesa sp.</i> <i>Eukiefferiella sp.</i> <i>Micropsectra sp.</i> <i>Orthocladius complex</i> <i>Rheotanytarsus sp.</i> <i>Tvetenia sp.</i></p>
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Samples were collected in erosional, detrital, and margin habitat found at BXON on October 10, 1995 (Aquatic Biology Associates 1995).

Table AY-7. Aquatic Macroinvertebrates in Jenny Creek

(orders, families, and subfamilies are in normal text; genera or species are italicized)

<p><u>Non-Insects</u></p> <p>Acari</p> <p><i>Hyallolella azteca</i></p> <p><i>Juga sp.</i></p> <p>Lymnaeidae</p> <p>Nematoda</p> <p>Oligochaeta</p> <p>Ostracoda</p> <p><i>Physella sp.</i></p> <p>Sphaeriidae</p> <p><u>Ephemeroptera:</u></p> <p><i>Acentrella turbida</i></p> <p><i>Baetis tricaudatus</i></p> <p><i>Isonychia sp.</i></p> <p><i>Tricorythodes minutus</i></p> <p><u>Plecoptera:</u></p> <p><i>Taeniopteryx sp.</i></p>	<p><u>Trichoptera:</u></p> <p><i>Cheumatopsyche sp.</i></p> <p><i>Dicosmoecus gilvipes</i></p> <p><i>Glossosoma sp.</i></p> <p><i>Hydropsyche sp.</i></p> <p><i>Hydroptila sp.</i></p> <p><i>Lepidostoma sp.</i></p> <p><i>Neophylax rickeri</i></p> <p><u>Coleoptera:</u></p> <p><i>Optioservus sp.</i></p> <p><i>Zaitzeva sp.</i></p> <p><u>Lepidoptera:</u></p> <p><i>Petrophila sp.</i></p> <p><u>Odonata:</u></p> <p><i>Aeshna sp.</i></p> <p><i>Argia sp.</i></p> <p><i>Enallagma lischynura sp.</i></p> <p><i>Ophiogomphus sp.</i></p>	<p><u>Diptera:</u></p> <p><i>Antocha sp.</i></p> <p><i>Clinocera sp.</i></p> <p><i>Dixa sp.</i></p> <p>Ephydriidae</p> <p><i>Hemerodromia sp.</i></p> <p>Forcipomyiinae</p> <p><i>Simulium sp.</i></p> <p>Stratiomyiidae</p> <p><u>Chironomidae:</u></p> <p><i>Apedilum sp.</i></p> <p><i>Chaetocladius sp.</i></p> <p>Chironomidae (pupae)</p> <p>Chironomini</p> <p><i>Corynoneura sp.</i></p> <p><i>Dicrotendipes sp.</i></p> <p><i>Eukiefferiella sp.</i></p> <p><i>Micropsectra sp.</i></p> <p><i>Microtendipes sp.</i></p> <p><i>Orthocladius complex</i></p> <p><i>Parametriocnemus sp.</i></p> <p><i>Paratanytarsus sp.</i></p> <p><i>Pentaneura sp.</i></p> <p><i>Potthastia gaedil Gr.</i></p> <p><i>Pseudoorthocladius sp.</i></p> <p><i>Rheocricotopus sp.</i></p> <p><i>Rheotanytarsus sp.</i></p> <p><i>Synorthocladius sp.</i></p> <p>Tanytarsini</p> <p><i>Thienemannimyia sp.</i></p> <p><i>Tvetenia sp.</i></p>
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Samples were collected in erosional, detrital, and margin habitat found at BXOS on October 10, 1995 (Aquatic Biology Associates 1995).

Table AY-8. Aquatic Macroinvertebrates in Jenny Creek (orders, families, and subfamilies are in normal text; genera or species are italicized)		
<p><u>Non-Insects</u></p> <p>Acari Copepoda Hydrobiidae <i>Hyalella azteca</i> <i>Hydra sp.</i> Lymnaeidae Nematoda Oligochaeta <i>Physella sp.</i> Planorbidae Sphaeriidae Turbellaria</p> <p><u>Ephemeroptera:</u> <i>Baetis tricaudatus</i> <i>Callibaetis sp.</i> <i>Epeorus albertae</i> <i>Ephemeralla inermis/infrequens</i> <i>Paraleptophlebia sp.</i></p> <p><u>Plecoptera:</u> <i>Calineuria californica</i> Capniidae <i>Malenka sp.</i> <i>Sweltsa sp.</i> <i>Zapada cinctipes</i> <i>Zapada oregonensis Gr.</i></p>	<p><u>Trichoptera:</u> <i>Dicosmoecus gilvipes</i> <i>Gumaga sp.</i> <i>Heteroplectron californicum</i> <i>Hydropsyche sp.</i> <i>Hydroptila sp</i> Hydroptilidae <i>Lepidostoma sp.</i> <i>Micrasema sp.</i> <i>Oecetis sp.</i> <i>Polycentropus sp.</i> <i>Rhyacophila brunnea Gr.</i> <i>Rhyacophila hyalinatas Gr.</i></p> <p><u>Coleoptera:</u> Dytiscidae <i>Eubrianax edwardsi</i> <i>Optioservus sp.</i> <i>Ordobrevia nubifera</i> <i>Zaitzeva sp.</i></p> <p><u>Megaloptera:</u> Corydalidae</p> <p><u>Odonata:</u> <i>Argia sp.</i> Coenagrionidae <i>Enallagma/Ishmura sp.</i> <i>Octogomphus sp.</i></p> <p><u>Hemiptera:</u> Corixidae Veliidae</p>	<p><u>Diptera:</u> <i>Brachycera sp.</i> Ceratopogonidae <i>Dixa sp.</i> Empididae Ephydriidae Forcipomyiinae <i>Limonia sp.</i> <i>Hemerodromia sp.</i> <i>Meringodixa sp.</i> Simuliidae Tipulidae</p> <p><u>Chironomidae:</u> <i>Apedilum sp.</i> Chironomidae (pupae) <i>Cricotopus sp.</i> <i>Cricotopus nostococladus</i> <i>Eukiefferiella sp.</i> <i>Microtendipes sp.</i> <i>Parametriocnemus sp.</i> <i>Procladius sp.</i> <i>Psectrocladius sp.</i> <i>Pseudochironomus sp.</i> <i>Rheocricotopus sp.</i> <i>Rheotanytarsus sp.</i> <i>Tanytarsus sp.</i> <i>Thienemannimyia sp.</i> <i>Tvetenia sp.</i></p>

Samples were collected in erosional, detrital, and margin habitat found at FRED on September 23, 1992 (Aquatic Biology Associates 1992).

Appendix Z - Standards and Guidelines for Special Status Species including Survey and Manage, Protection Buffer and Special Interest Species

Management of Threatened, Endangered and Sensitive Species.

Management of these species would be in accordance with applicable federal laws and regulations and Bureau policy. This includes the Endangered Species Act, Migratory Bird Treaty Act and Bald and Golden Eagle Protection Acts as well as BLM Manual section 6840.

Survey and Manage/ Protection Buffer Species

The Northwest Forest Plan's (NWFP) Record of Decision (ROD) (USDA 1994a) established the Survey and Manage and Protection Buffer programs in order to ensure the viability of certain rare and locally endemic species within the range of the northern spotted owl. The Survey and manage ROD of January 2001 (USDA 2001) amended the NWFP ROD and revamped the Protection Buffer and Survey and Manage species management direction. The Protection Buffer species category was eliminated and those species were incorporated into the new Survey and Manage species direction. The designation of the Cascade-Siskiyou National Monument (CSNM) nullifies the application of the Northwest Forest Plan and all Survey and Manage guidelines for the Monument lands. However, in order to help ensure the health and viability of these rare and locally endemic species in the Monument, a sub-set of the Survey and Manage ROD provisions have been incorporated into all of the action alternatives for the Monument Resource Management Plan. Pursuant to implementation of the NWFP ROD, and the Survey and Manage ROD, interagency survey protocols and management recommendations have been developed for some of the Survey and Manage species, and are currently being developed for the rest. The protocols and recommendations are evolving documents. The most recent, current, official survey protocols and management recommendations would be applied to projects in the Monument for selected species. The Survey and Manage provisions from the NWFP ROD that would be incorporated into the action alternatives are described below. The set of provisions that would be applied would be identical across all action alternatives.

Provision for each species would be directed to the range of that species and the particular habitats that it is known to occupy.

The standards and guidelines contains 6 strategies, and each survey and manage species is placed into one of the six. There are twelve terrestrial Survey and Manage species known or suspected to occur in the Cascade-Siskiyou National Monument. Three species are terrestrial mollusks (slugs and snails). The great gray owl is now a survey

and manage species. Eight are vascular plants, lichens, mosses, liverworts, or fungi, and their strategies are outlined below. The strategy(s) assigned to any species is subject to change. Any future policy, regulation or guideline change coming from the Regional Ecosystem Office that enhances the protection of these species would be incorporated into the management of the Monument.

Survey and Manage Strategies for Terrestrial Wildlife in the Monument

Great Gray Owl

This is a category C species. The management direction for this species in the Monument would be to :

1) Manage high priority sites so as to maintain their suitability for the species. High priority sites would be identified based on the most current interagency criteria for making such a determination. This criteria has not yet been developed for this species. In the absence of such criteria and subsequent determination of high and low priority sites, all known sites would be managed so as to maintain their suitability for the species.

Specific protection measures for the Great Gray Owl include the following:

- provide a no-commercial harvest buffer of 300 feet around meadows and natural openings
- establish 1/4-mile protection zones around known nest sites
- implement the standardized interagency survey protocol (including any future modifications) prior to design of ground disturbing activities
- protect all future discovered nest sites as previously described
- incorporate any future interagency Management Recommendations for this species into the management of the Monument.

2) Perform pre-disturbance surveys using the most current interagency survey protocol. Surveys would be completed within the habitat types or vegetation communities associated with the species, and the information gathered from the surveys would be used to establish managed sites for the species. These surveys would precede the design of all activities with a high potential to adversely affect the species or its habitat.

3) Perform strategic surveys in the Monument if the interagency Great Gray Owl Taxa Team and or the REO determine that such surveys are necessary in the area.

Terrestrial Mollusks

The table AZ-1 displays the status of the special status terresteial mollusks in the Monument.

Table AZ-1 Special Status Terrestrial Mollusks known or suspected in the CSNM.		
Species	Status	Presence
<i>Helminthoglypta hertleini</i> (land snail)	S&M Category (B4)	Suspected
<i>Monadenia Chaceana</i> (land snail)	S&M Category (B4)	Probable
<i>Trilobopsis themana</i> (land snail)	S&M Category A	Suspected

Trilobopsis themana (land snail)

This is a Survey and Manage category A species. The management direction for this species in the Monument would be to:

- 1) Manage all known sites so as to maintain their suitability for the species. Management of known sites would follow the most current interagency Management Recommendations for this species.
- 2) Perform pre-disturbance surveys using the most current interagency survey protocol. Surveys would be completed within the habitat types or vegetation communities associated with the species, and the information gathered from the surveys would be used to establish managed sites for the species. These surveys would precede the design of all ground disturbing activities.
- 3) Perform strategic surveys in the Monument if the interagency Mollusk Taxa Team and or the REO determine that such surveys are necessary in the area.

Helminthoglypta hertleini and Monadenia chaceana (land snails)

These are Survey and Manage category B (foot note 4) species. The management direction for these species in the Monument would be to:

- 1) Manage all known sites so as to maintain their suitability for the species. Management of known sites would follow the most current interagency Management Recommendations for these species.
- 2) Perform pre-disturbance surveys using the most current interagency survey protocol. Surveys would be completed within the habitat types or vegetation communities associated with the species, and the information gathered from the surveys would be used to establish managed sites for the species. These surveys would precede the design of all ground disturbing activities.
- 3) Perform strategic surveys in the Monument if the interagency Mollusk Taxa Team and or the REO determine that such surveys are necessary in the area.

Survey and Manage Strategies Plants, Lichens and Fungi.

Following the Northwest Forest Plan, areas in the Monument were surveyed from 1997-1999 for survey & manage plants, lichens and fungi. Eight species were documented to occur (table AZ-2), although surveys were limited to conifer dominated communities in the northern portion of the Monument, especially later successional communities. Several of these species are also now Bureau Special Status species (Sensitive, Assessment and Tracking) and will be managed accordingly. Below are the strategies to be used for Survey & Manage Plants, lichens and fungi documented for Cascade Siskiyou National Monument.

Category A. Survey and Protect

All species in this category are also Bureau Special Status species (BSSS) and will be managed accordingly. Bureau 6840 policy requires that Bureau actions will not contribute to the need to list any of these species. Surveys prior to implementation of ground disturbance will be done for any of these species. Surveys will occur in habitats that are considered likely to support these species. These surveys will be conducted at a scale and timing most appropriate to the species biology, as determined by the Agency Botanist. Multi-species surveys would be used wherever they would be most efficient. To the degree possible, surveys would be designed to minimize the number of site visits needed to acquire credible information, which for most species is a single visit during the growing, flowering or fruiting period, depending on the taxa. Protection or mitigation of the activity to maintain population viability will likely be the most common management measure. Actions to maintain or enhance habitat are allowed, and may be required to maintain the viability of BSSS species through time. Listing and delisting of species will follow the established BLM BSSS list process which tiers to the Oregon Natural Heritage Program listing process. New species will be managed accordingly.

Category B. Manage known sites

All existing species in this category in the monument will be managed to maintain viability of the existing populations, even though individual plant or fungus species could be affected. Activities in occupied habitat will be allowed only if the viability of the documented population is maintained. Surveys to locate additional sites prior to ground disturbing activities are not required, however efforts to relocate the documented site (relocation surveys) may need to occur prior to implementation of the activity. In many cases, the appropriate management action will be protection of relatively small sites, on the order of tens of acres. Management actions in occupied habitat that would maintain or enhance habitat for these species are allowed, based on the professional judgement of the Botanist, existing protocols, and existing information. New sites found in the future will also be managed.

Table AZ-2. Survey and Manage Plants, Lichens and Fungi Found within the CSNM			
Species	Taxa Group	CSNM Category*	TNC Rank**
<i>Bondarzewia mesenterica</i>	fungus	A	G3/S1
<i>Cypripedium fasciculatum</i>	vascular plant	A	G3G4/S2
<i>Cypripedium montanum</i>	vascular plant	A	G4G5/S4
<i>Dendriscoaulon intricatum</i>	lichen	B	NR
<i>Phlogiotis helvelloides</i>	fungus	B	NR
<i>Pithya vulgaris</i>	fungus	B	G4/S1
<i>Plectania milleri</i>	fungus	B	G1/S1
<i>Sarcosphaera eximia</i>	fungus	1	NR

*Management Categories

Category A = Surveys and Protect

Category B = Manage known sites

**TNC (The Nature Conservancy) Ranks

G = Global rank S = State rank NR = Not Ranked

1 = Critically imperiled because of extreme rarity or because it is somehow especially vulnerable to extinction or extirpation.

2 = Imperiled because of rarity or because other factors demonstrably make it very vulnerable to extinction (extirpation).

3 = Rare, uncommon or threatened but not immediately imperiled.

4 = Not rare and apparently secure but with cause for long-term concern.

5 = Demonstrably widespread, abundant, and secure.

Special Interest Species

Special interest species in the Monument include deer and elk. The Big Game Management Emphasis Areas established in the NWFP ROD and discussed in the wildlife section in Chapter 2 of this document would be retained as part of the management direction for the monument.

