

# SUMMARY OF PUBLIC COMMENTS

## FOR THE DRAFT SOUTHEASTERN OREGON RESOURCE MANAGEMENT PLAN

Prepared by

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# **INTRODUCTION**

In October 1998, the BLM opened a 120-day comment period to allow public evaluation of the Draft Southeastern Oregon Resource Management Plan (SEORMP), a comprehensive management framework plan for 6.3 million acres of public land in the Vale and Burns Districts. To give the public an opportunity to visit with many of the resource specialists who prepared the plan, open houses were conducted in Burns, Diamond, Fields, Jordan Valley, McDermitt, Portland, and Vale. These open houses were designed to help the concerned public better formulate their written responses to the plan. At the request of BLM, all public comments were received in writing, and virtually all were received through the mail. The information contained in these public inputs is summarized in this report.

## **PUBLIC INPUT ANALYSIS**

The purpose of this analysis is to objectively identify and display the nature and extent of the public input received on the BLM's Draft SEORMP. This report is a summary display of the analysis efforts, and does not evaluate the value or importance of the comments received. These judgements are made by the SEORMP Project Management Board and the State Director.

The basic concept of this system is that public input is offered as comments or opinions for, against, or about an issue or program in question, along with reasons supporting that comment or opinion. The basic goal of an analysis of public input is to identify and display the opinions and supporting reasons contained in the public input and how they differed according to other variables that may be important, such as respondents affiliation, place of residence, or other factors.

For this analysis we used the following steps:

- 1) Identified the basic questions for which the decision-makers need answers, including where do the publics agree or disagree with the BLM's affected environment, proposed management actions, and analysis of those actions, and what reasons were given?
- 2) Surveyed the inputs to determine the breadth of issues discussed.
- 3) Develop a form to guide the systematic processing of the inputs.
- 4) Read each input and identify the opinions/comments and supporting reasons they contain and enter the information on the form.
- 5) Assembled the opinions, comments, and supporting reasons into an organized table which summarizes the content of the public input.

The team who read the comment letters received training to ensure a more uniform application of the content analysis system and to minimize variation. This analysis and report provides a useful tool to help decision-makers decide and aid the public in evaluating decisions made. The report allows the reader to identify areas of interest and pursue detailed information where needed. It is very important to understand that this report is not intended to replace or reduce the importance of reading of individual letters. The judgement as to the importance of information received depends heavily upon a personal knowledge gained through reading individual inputs.

## **REPORT FORMAT**

As mentioned previously, this report is intended to summarize the nature and extent of public comments received on the Draft SEORMP. Some general data, including demographics, is presented prior to analysis of comment. Data gathered in the analysis of comment is displayed by major heading or category, most of which are specific programs or resources covered by the Draft SEORMP. Numbers are presented in both Inputs (I) and Signatures (S): for example; if three people signed one letter the tally would be I=1 and S=3.

Some inputs were official positions of governments, groups, companies or organizations who represented a large constituency. These inputs (letters) were also displayed separately to the decision-maker.

## **ANALYSIS RESULTS**

### **General and Demographic Data**

We received 266 letters through conventional and electronic mail, 14 of which were received after the deadline, but were included in the content analysis. Table 1 shows the state of origin for comments received on the plan; Table 2 breaks down respondents based on individual, group, or agency affiliation; and Table 3 lists the agencies, groups, and organizations who responded.

The Oregon Natural Desert Association (ONDA) mailed an "Alert Action" brochure urging their membership to reject Alternative C and support a strengthened Alternative D that excludes livestock grazing from wild and scenic rivers, riparian areas, critical fish and wildlife habitat, areas of critical environmental concern (ACECs), wilderness study areas (WSAs), and grazing allotments in fair or poor condition. They were also urged to reject adaptive management in favor of standards and guidelines and rigorous monitoring, and to discuss WSAs and other areas and tell why they want them protected. There were about 146 ONDA letters ranging from almost verbatim to a general statement to reject Alternative C and strengthen Alternative D that excludes grazing.

<b>Table 1. State of origin of respondents.</b>	
State	Number
Oregon	232
California	9
Washington	9
Idaho	6
Colorado	2
Florida	1
Maryland	1
Montana	1
South Dakota	1
Virginia	1
Unknown	3
<b>TOTAL</b>	<b>266</b>

<b>Table 2. Type or affiliation of respondent.<sup>1</sup></b>	
Respondent	Number
Individuals <sup>2</sup>	212
Special Interest Groups	37
Federal/state agencies	7
County/local agencies	3
Tribes	1
<b>TOTAL</b>	<b>260</b>

<sup>1</sup> Some groups sent more than one letter.

<sup>2</sup> Approximately 146 of these individuals mailed comments/concerns prompted by an "Action Alert" mailing by the Oregon Natural Desert Association.

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**Table 3. List of agencies, groups, and organizations responding.**

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**Agencies**

Bureau of Reclamation	Mackenzie Ranch
Burns Paiute Tribe	Malheur Lumber Company
Harney County Court	Mazama Lodge
Malheur County	National Wildlife Federation
Malheur County Commissioners	Native Plant Society of Oregon
Oregon Division of Fish and Wildlife	Navillus Press
Oregon Division of State Lands	Northwest Environmental Defense Center
Oregon Division of Water Resources	Oregon Cattlemen's Association
Oregon State Senate	Oregon Natural Desert Association
U.S. Environmental Protection Agency	Oregon Natural Resources Council
U.S. Geological Survey	Otley Ranches

**Tribes**

Burns Paiute Tribe

**Other Interested Groups**

American Lands Alliance	Prairie Wood Products
Baltzor Cattle Company, Inc.	RangeBiome
Cascadia Forest Alliance	Roaring Springs Ranch, Inc.
Columbia River Conservation League	Salem Audubon Society
Committee for Idaho's High Desert	Sierra Club Oregon Chapter
Defenders of Wildlife	Sisters Forest Planning Committee
Desert Trail Association	Skinner Ranches, Inc.
Idaho Watersheds Project	The Nature Conservancy
Izaak Walton League of America	The Wildlife Society Oregon Chapter
Jackies Butte Permittees	Western Heritage Enterprises
Kettle Range Conservation Group	
Kiger Ranch, Inc.	
Lucky 7 Ranch	

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## Analysis of Comments

The following section summarizes public input by program or category. Under each bolded category is a brief summary. Following the summary are the specific OPINION/COMMENT(s). Numbers are presented in both Inputs (I) and Signatures (S): for example; if three people signed one letter the tally would be I=1 and S=3. If specific OPINION/COMMENT(s) have reasons, they will follow each OPINION/COMMENT(s) and will be indented and preceded by a number which reflects the number of times that reason was given. Some bigger categories, such as **RIPARIAN**, may be subdivided into sections of like concern. Following each program or category will be LETTER NUMBER which refer to the specific letter from which OPINION/COMMENT(s) data was taken. Bolded letter numbers are those which are more complex or should be referenced for more detail.

Decision-makers should recognize that this analysis is a summary display, and that not all inputs appear as they originally appeared in the letters received. Also, there is inherent variability between individual coders, which may result in some inconsistencies in data display. As mentioned earlier, this report does allow the reader to efficiently identify areas of interest and pursue detailed information where needed. However, this report is not intended to replace or reduce the importance of reading of individual letters.

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I	S	OPINION/COMMENT
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### **PLAN FORMAT**

*This category refers to comments received regarding the layout and display of the document.*

- |   |   |   |
|---|---|---|
| 1 | 1 | Suggest that goals on Page 3-1 be included in Purpose and Need section.           |
| 1 | 1 | A chapter for each resource would make the document easier to read.               |
| 1 | 1 | Page headings should include the topic discussed on that page.                    |
| 1 | 1 | Table of Contents and body of report are not properly marked with section number. |

LETTER NUMBER: 004, **240**, **241**

**ALTERNATIVES IN GENERAL**

*Alternatives in the Draft SEORMP ranged from Alternative A, which emphasized commodity production, to Alternative E which emphasized natural values. Alternative C was the agency's preferred alternative.*

*ONDA mailed an "Action Alert" brochure urging their membership to reject Alternative C and support a strengthened Alternative D that excludes livestock grazing from wild and scenic rivers (WSRs), riparian areas, critical fish and wildlife habitat, ACECs, WSAs, and grazing allotment in fair or poor condition. They were urged to reject adaptive management in favor of standards and guidelines and rigorous monitoring. Members were encouraged to discuss WSAs and other areas and tell why they want them protected. ONDA letters ranged from almost verbatim to a general statement to reject Alternative C and strengthen Alternative D that excludes grazing.*

*The vast majority of respondents supported rejection of Alternative C in favor of a strengthened Alternative D, citing continued resource degradation by livestock commodity use and the BLM's historic priority of such use.*

146 155 Commentors favor strengthened Alternative D that more greatly restricts or excludes livestock grazing.

*Reasons:*

(98) because livestock should be excluded from riparian areas

(87) because livestock should be excluded from fish and wildlife habitat

(83) because livestock should be excluded from WSRs

(79) because livestock should be excluded from grazing allotments in fair and poor condition

(77) because livestock should be excluded from WSAs

(64) because livestock should be excluded from ACECs

57 62 Commentors said that BLM should reject Alternative C.

*Reasons:*

(15) fails to reduce grazing when damage occurs

(14) does not protect sensitive fish and wildlife habitat and habitat diversity

(10) fails to designate enough WSR miles

(10) fails to stop grazing on Donner und Blitzen and Owyhee WSRs

(9) does not adequately reduce livestock grazing on Steens Mountain

(6) does not protect riparian

(6) allows too much off-highway vehicle (OHV) use

- (4) relies on adaptive management
- (3) fails to change current conditions and management practices enough even though public lands are not adequately protected/restored
- (3) fails to stop livestock grazing when scientists recommend otherwise
- (3) fails to describe activities allowed in Steens National Conservation Area (NCA)
- (3) because it puts livestock industry over public concerns and land health
- (3) fails to stop grazing in WSAs
- (2) fails to consider ecosystem management principles
- (2) fails to discontinue grazing in ACECs
- (1) needs stronger standards and guidelines and monitoring
- (1) high desert lands are too fragile
- (1) fails to reduce suppression of wildfire
- (1) seriously degrades ecosystem
- (1) increases spread of weeds through OHV use
- (1) alternative is too similar to alternatives A and B; SEORMP Resource Advisory Council could not choose; prefers to address individually and failed to reach a consensus.

31 32 Commentors favor Alternative D.

*Reasons:*

- (11) allows for livestock grazing reductions
- (9) adds WSRs
- (8) adds ACECs and research natural areas (RNAs)
- (7) emphasizes low impact recreation
- (7) deemphasizes fire suppression
- (6) better for stream/riparian which need protection
- (5) more closely embraces ecosystem management
- (5) restores/closes recreation sites
- (3) helps land to recover from past degradation
- (3) less alteration of vegetation
- (3) best compromise between livestock industry and other resources
- (2) better for nongame wildlife
- (1) better for hunting, fishing, and other publics
- (1) better protects scenic values
- (1) reduce grazing on Alvord Desert and Steens Mountain

I	S	OPINION/COMMENT
3	3	Reject Alternative A. <i>Reasons:</i> (2) does not adequately protect public land resources (1) is not a realistic alternative (1) outside law on Endangered Species Act and Wilderness Act
2	2	Reject Alternative B. <i>Reasons:</i> (1) does not adequately protect public land resources (1) allows too much livestock grazing
1	1	Support Alternative E. <i>Reasons:</i> (1) opposes abuses of public land resources
1	1	Reject Alternative E. <i>Reasons:</i> (3) is not a realistic alternative (2) too little intervention can damage environment (1) too unresponsive to the need of land (1) too unresponsive to the needs of public (1) some livestock grazing is good (1) does not allow prescribed burns
1	1	Support Alternative A. <i>Reasons:</i> (1) supports liberty and welfare of country
1	1	Support Alternative C.
1	1	Support Alternative B.
1	1	Support between alternatives B and C.
5	5	Plan lacks depth of analysis to meet the National Environmental Policy Act (NEPA). <i>Reasons:</i> (4) fails to look at full range of alternatives (1) alternatives are too vague (1) permitted activities are too vague (1) too little data presented

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I	S	OPINION/COMMENT
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- |    |    |   |
|----|----|---|
| 3  | 3  | Alternatives are inadequate.<br><i>Reasons:</i><br>(2) not enough range of alternatives<br>(1) will lead to demise of southeastern Oregon desert lands<br>(1) needs to explore severe cuts in grazing<br>(1) Alternative A has no counter balance<br>(1) need restoration before Alternative D can be implemented |
| 26 | 28 | Use specific standards and guidelines in lieu of adaptive management.   |
| 22 | 23 | Manage the land for everyone, not just ranchers.  |
| 6  | 6  | Supports adaptive management.   |
| 2  | 2  | Object to amount of OHV use in planning area.   |
| 2  | 2  | Need increased monitoring and enforcement of livestock grazing on Steens Mountain.  |
| 1  | 1  | Protect resources by increasing monitoring.   |
| 1  | 1  | Management goals of BLM should parallel Oregon Division of State Lands.   |
| 1  | 1  | Grazing impacts were not fully identified/analyzed.   |
| 1  | 1  | Guidelines for temporary nonrenewable grazing are not fully explained in draft.   |
| 1  | 1  | Various alternatives are VRM Class II or II/III; should not be designated because of existing improvements along Oregon Trail.  |

LETTER NUMBER: 002, 012, 013, 014, **021**, 022, 023, 024, **028**, 029, **030**, 0321, 032, 034, 035, 036, 037, 038, 040, 041, 042, 044, 045, 046, 046, 047, 049, 050, 051, 053, 054, 055, 056, 057, 058, 059, 060, 061, 062, 063, 065, 066, 068, 069, 070, 071, 072, 073, 074, **075**, 076, 077, 079, 080, 081, 083, 086, 087, 088, 089, 090, 091, 095, 096, 097, 098, 100, 101, **103**, 106, **107**, **108**, **110**, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 125, 126, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 140, 141, 142, 143, 144, 145, 146, 147, 149, 150, 151, **153**, **154**, 155, 156, 157, 159, 160, 161, 162, 163, 165, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, **181**, **182**, 185, 186, 187, 190, 191, 192, 193, 194, 197, 198, 200, 201, 202, 203, 203, 206, 209, 210, 211, 212, 213, **214**, 215, 216, 223, 224, 236, **241**, 242, 243, 244, 245, 254, 255, 256, 258, 259, 260, 261, 263, 264, 265, 268, 270, **272**

## MISCELLANEOUS COMMENTS

*This section is subdivided into Plan in General; Personal Responses; Ecological and Natural Values; Military and Nonmilitary Aircraft; Grazing Standards and Guides and Best Management Practices (BMPs); and Other.*

### Plan in General

- |   |    |  |
|---|----|--|
| 4 | 10 | The document is vague, wordy, repetitious, and gives no clear guidance or direction. |
| 4 | 5  | One cannot know possible impacts without more detail and analysis.                   |

I	S	OPINION/COMMENT
3	8	BLM does not evaluate a reasonable range of alternative in the draft.
2	7	The plan fails to describe how the agency will manage the land to achieve the stated objectives.
2	3	A full analysis of specific goals, objectives, strategies and actions must be done.
2	2	The plan should be adopted as proposed.
2	2	Plan needs to be more proactive.
2	2	Plan should be written with long-term outlook.
2	2	The way the information was presented made it difficult to bring the pieces together.
2	2	A more thorough review of current literature is needed.
1	6	BLM does not assess the cumulative effects on resources of maintaining existing grazing levels.
1	6	The plan fails to appropriately evaluate reasonably foreseeable adverse effects.
1	6	The plan fails to describe the 6.3 million acres of planning area.
1	6	The plan fails to discuss the major causes of degradation.
1	6	The plan does not adequately describe the affected environment.
1	2	A comparison document should be developed to show changes from current status to the Draft SEORMP.
1	2	It is impossible to determine if goals or objectives can be reasonable met.
1	2	BLM bureaucrats, politicians, or special interest groups should not be the judge of acceptable impacts.
1	1	Scoping illustrates the lack of public knowledge about the condition of public land and how the BLM protects the land.
1	1	The final plan should include a statement explaining people's concerns during scoping.
1	1	The document does not address positive management already implemented.
1	1	The plan should be an adjustment of existing, successful programs.
1	1	The BLM needs to show they are meeting legal mandates.
1	1	There was a lack of clear-cut proposals in the plan.
1	1	It would be useful to have the following definitions in the document: sensitive resources, acceptable limits, caves, desirable introduced plant species.
1	1	Show a more detailed description of the landscape prior to Taylor Grazing Act.
1	1	Lauserica Fence Plan should be removed from the plan.
1	1	The stated purpose of the document is too broad.
1	1	There is offered only a limited ability to choose between alternatives.
1	1	It is difficult to follow the draft when reference material is mentioned but not included in the document.

I	S	OPINION/COMMENT
1	1	Objectives must be quantifiable, measurable, and reasonable.
1	1	Objects to reliance of Interior Columbia Basin Ecosystem Management Project (ICEBMP) scientific assessment.
1	1	Object to reliance on policies which are not law.
1	1	There was a failure to include information from Idaho Watersheds Project during scoping.
1	1	Request a supplemental plan better characterizing the environment and having a new range of alternatives.
1	1	The public should be given opportunity to analyze actions and meet halfway.
1	1	Assigned a rating of EC-2 to the draft plan.
		<i>Reasons:</i>
		(1) lack of clarity in management direction
		(1) absence of monitoring strategy to evaluate plan effectiveness
		(1) lack of road management element
		(1) further discussion needed on juniper management and nonnative plant use
1	1	Difficult to assess if the implementation of one resource objective is compatible with implementation of another.
		<i>Reasons:</i>
		(1) separate discussion of rangeland vegetation and rangeland/grazing use
		(1) statements about bighorn sheep in the wild horse objectives
1	1	Cumulative impacts of any proposed action should be developed.
1	1	There is no “Analysis of the Management Situation” in the document.
1	1	Oregon Division of Fish and Wildlife (ODFW) should be listed with the agencies providing comments on the scoping process.
1	1	Specific goals and objectives should be set forth in section 1.
1	1	The goals for planning purposes should be restated as management on the basis of “multiple use and sustained yield”.
1	1	The plan should discuss the legal authority and implications of tiering to a draft EIS.
1	1	The specific philosophies for ICEBMP should be enumerated in the SEORMP.
		<i>Reasons:</i>
		(1) to allow for complete disclosure and knowing review and comments
1	1	Plan gives false and misleading information.
1	1	The respondent’s specific scoping comment letter is not in Appendix.
1	1	Plan fails to comply with NEPA, Federal Land Policy and Management Act (FLPMA), Public Rangeland Improvement Act (PRIA), and draft Eastside EIS.
1	1	Table of Contents and body of the report are not properly marked with section number.

I	S	OPINION/COMMENT
		<b>Personal Response</b>
20	22	BLM needs to protect the lands and resources for future generations.
8	8	I commend BLM for the detailed and thoughtful analysis.
4	4	Southeast Oregon is beautiful and unique.
3	6	We encourage BLM to consider private landowners, cattle ranches, and Harney County when finalizing the plan.
1	6	We commend the BLM for recognition of Steens Mountain as a place of significant value to the American public.
1	6	We support BLM in its efforts to manage Steens Mountain for its wilderness and recreational values.
1	2	We appreciate the outstanding maps that accompanied the document.
1	1	Respondent feels he is active in public land concerns and his comments should be considered in the plan.
1	1	Respondent included 2 letters indicating his concern for public resource lands.
1	1	Have found the Burns District Office to be helpful and responsive.
1	1	Great efforts were made to identify stakeholders in building this plan.
1	1	Thank you for the opportunity to participate in the review of the Draft SEORMP.
1	1	Thanks for the high level of public service you and your staff provide.
1	1	The BLM needs to do a better job of showing good things done since the Taylor Grazing Act.
1	1	For clarification: the comment letter is from "Oregon Chapter of the Wildlife Society".
1	1	I compliment you for the courage to recognize the impacts of cattle as well as other resource uses.
1	1	Appreciates the discussion of Catlow Conservation Agreement.
		<b>Ecological and Natural Values</b>
13	13	Manage the land for natural ecosystem function.
2	2	Continue multiple use in WSAs.
2	2	Efforts to protect natural resources now will result in lands with higher values later.
2	2	Against any additional SMAs.
1	6	There are no numerical, objective standards for management of rangeland, fire, soils, and other resources.
1	1	WSAs, WSRs, ACECs, all limit flexibility.
1	1	Inventories are needed to validate current watershed level, ecologically based management.
1	1	<i>Desirable</i> vegetation is opinion: use <i>ecological condition</i> .

I	S	OPINION/COMMENT
1	1	Use of <i>landscape level</i> is ambiguous.
1	1	ACEC designations do not always protect natural values of sites.
1	1	Knowledge of ecology in an area should be more important than short-term politics.
1	1	Watershed management need the cooperation of all entities in the watershed.
1	1	Must balance short-term economics against long-term ecology.
		<i>Reasons:</i>
		(1) mankind survival is dependant on healthy ecosystems
		(1) protect Oregon's deserts from degradation
1	1	Flood hazard mapping, stream gauging records, and other surface hydrology data are necessary to appropriately manage land.
		<b>Military and Non-military Aircraft</b>
5	8	Aircraft should be allowed to land inside the Steens Mountain Recreation Lands during the whole year; restrictions on aircraft should be removed from the plan.
		<i>Reasons:</i>
		(1) aircraft use would be for commercial and management purposes
		(1) discriminates against a particular motorized vehicle
		(1) discriminates against certain members of the public
		(1) adversely affects local, county and state business
		(1) promotes the use of more environmentally detrimental methods
		(1) discriminates against physically challenged
		(1) reduces options for dispersed recreation
		(1) makes search and rescue, fire operations, etc., more difficult to do
		(1) BLM has no means of enforcement
		(1) BLM would lose revenue
		(1) there would be less public land monitoring
1	6	BLM has failed to characterize, describe and quantify the increases in military flights over Oregon public lands since the last planning process.
1	6	BLM has failed to ensure that characteristics of SMAs are not being degraded by military activities.
1	6	BLM has failed to minimize negative effects of military activities.
1	6	People who use public land are often annoyed by loud noises from military aircraft.
1	6	Concerned about pollution and health risks from military training activities.
1	6	BLM must prepare an adequate assessment of impacts by military training activities.

I	S	OPINION/COMMENT
1	2	Aircraft landing during all times of the year would meet the current nonimpairment for WSAs.
1	2	When the Loop Road is open, landings or low-level flights would be avoided in heavy use or key scenic areas.
		<b>Grazing Standards and Guidelines and Best Management Practices</b>
5	5	Against cutting animal unit months (AUMs); not enough data.
2	2	Multiple use centers around grazing; open range is outdated and needs reform.
2	2	Public may demand grazing be stopped if BLM cannot manage grazing on public land.
2	2	The lands are arid and vulnerable to overgrazing.
1	6	BMPs provide no objective numerical standards for most management activities.
1	6	BMPs contain no direction for grazing management, weed control or other issues.
1	6	The section on “Standards and Guidelines” in Appendix Q contains no clear standards or management direction to guide BLM in management.
1	6	Standards for Rangeland Health are meaningless by the insistence that all landscape be managed with site heterogeneity in mind.
1	6	The Resource Advisory Council's (RAC's) “potential indicators” are not true indicators, only general characteristics of the landscape.
1	1	Don't subsidize marginal cattle producers.
1	1	Coordination with regulations is important regarding involvement of livestock producers.
1	1	Concerned about anti-grazing tone of Appendix D and plan in general.
1	1	Grazing and mining laws are archaic.
1	1	Realizes that grazing on public land is a way of life for some people.
1	1	Adopt clear standards and guidelines for management and budget for monitoring.
1	1	Understands that BLM is committed to multiple use management, including grazing.
1	1	Understands that grazing is complicated by mixtures of public and private lands.
		<b>Other</b>
5	5	Protect land for wildness and low impact recreation.
1	2	The document could be harmful and ruin family business.
1	2	The draft should include “impacts to private lands and business”.
1	2	The North Loop Road should not be closed to landowners during the winter months.
1	1	New, commercial development should be restricted.
1	1	Amend wildlife objective to manage for wildlife/livestock predators.
1	1	Object to reliance on <i>Oregon Bighorn Management Plan</i> .
1	1	Hunters and anglers should not be classified with grazing as consumptive uses.

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I	S	OPINION/COMMENT
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1 1 It is not right to say that funding would be basically the same across all alternatives.

*Reasons:*

(1) some alternatives have greater potential for generating funds

(1) funding for monitoring under adaptive management is highest priority

1 1 Educate public land users to mitigate their negative impacts.

LETTER NUMBER: 004, 007, 008, 009, 010, 015, 016, **017**, 018, 019, 023, 026, 030, 035, 064, 065, 069, 071, 072, **075**, 080, 083, 088, 093, 094, 099, 100, 105, **107, 109, 110**, 254, 255, 256, 257, 258, 259, 260, 262, 264, 265, 267, 270, **273**, 122, 131, 134, 135, 148, 151, 152, 153, 157, 163, 167, 168, 189, 193, 214, **180**, 182, **184**, 186, 200, 206, 214, 235, 141, 142, 158, 166, 217, **218**, 220, 222, 223, 225, 226, 228, 231, **232**, 236, 238, 239, 240, 241

## **AIR RESOURCES**

*Other comments may be found under FIRE.*

1 1 More data are needed to support the conclusions that dust emission do not result in deteriorated air quality and that no long term cumulative impacts to air quality will occur under all alternatives.

LETTER NUMBER: 004

## **ENERGY AND MINERALS**

*Most respondents favor No Surface Occupancy (NSO) stipulations in Alternative D, and do not want mineral development in any SMAs. A few respondents favor mineral development and flexibility for commodity production.*

3 3 Support NSO stipulations in Alternative D.

*Reasons:*

(1) Federal mining laws are antiquated

3 3 Close entire area to mining use.

2 3 Mineral leases should not conflict with resource values, especially SMAs.

2 3 Support buffer at Borax Lake.

2 2 Energy and minerals should be developed.

1 1 Numbers are arbitrary and limit future needs and opportunities.

1 1 Need more flexibility concerning small and low impact minerals such as sand and gravel for road maintenance.

1 1 Alternative C excessively restricts geothermal and rock pits.

1 1 Protect WSAs that might be dropped in the future from mineral use.

1 1 ACEC/RNAs should be withdrawn from mineral entry.

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I S OPINION/COMMENT

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*Reasons:*

(1) degrades values for which originally protected

- 1 1 Page 2-3: should read: report will be available in 1999.  
1 1 Page 2-8: USGS reference should be (USGS 1994, 1996).  
1 1 Section needs to be added regarding potential geologic hazards in area.

LETTER NUMBER: 004, 011, 041, 045, 140, 157, 180, **218**, 223, **241**,

**FIRE**

*Commentors favor deemphasis on fire suppression.*

- 9 9 Prescribed fire should be used.

*Reasons:*

(3) to improve range condition

(1) to protect resource values

(1) to return vegetation complexity

- 8 8 Fire suppression should be deemphasized.  
3 3 Suppress fire when unnatural conditions exist or on degraded land.  
2 7 Support appropriate management response on all wildfire.  
2 2 Suppress fire in WSAs.  
2 2 BLM must clearly define and provide rationale for terms such as *health*, *productivity*, *catastrophic*, and *restoration*.  
2 2 BLM must consider alternatives to fire which include reductions in grazing.  
2 2 Rehabilitation of burns may use nonnative species.  
1 1 Rehabilitation of burns may use nonnative species only if justified.  
1 1 Rest burns for 5 years from grazing.  
1 1 Aspen will not regain dominance after 5 years.  
1 1 Manage grazing to limit catastrophic fire.  
1 1 Unclear burning objectives between Air Resources limit (page 3-10, 4-3) and Rangeland Vegetation (page 4-16).  
1 1 Coordinate burns with Oregon Division of Fish and Wildlife (ODFW).  
1 1 Conduct site-specific analysis on vegetation communities to protect natural ecosystems.  
1 1 Burn should not be conducted on lands in poor condition and land vulnerable to exotic plant species invasion.  
1 1 Objective 2 (page 3-15) should clarify "natural vs. prescribed ignitions" and "maintain vs. restore natural ecosystems".

I	S	OPINION/COMMENT
1	1	BLM should post "Burn Bond" for site rehabilitation.
1	1	BLM should provide economic analysis for actions under each alternative, including ground condition assessment, assessment of the visual environment, and assess worst-case scenarios.
1	1	Page 3-9: description of alternatives lacks sufficient detail.
1	1	Fire can be more destructive than livestock grazing.

LETTER NUMBER: 011, **017, 030**, 035, 070, **075, 109, 110**, 112, 123, 157, 180, **182**, 195, **218, 226, 232**, 235, **240, 241**, 256, 264, **273**

## FOREST AND WOODLANDS

*Most comments in this category were related to juniper control.*

- 5 5 Recommend low priority for juniper treatments; control with wildfire.
- 4 6 Juniper control is necessary to preserve our lands.
- 3 3 Support a zero cut on federal lands except to retain forest health.
- 1 1 Mange timber stands through timber harvest.
- 1 1 Do not cut old growth.
- 1 1 An accurate inventory of juniper acres less than 40 years of age has not been made.
- 1 1 The number of acres needing treatment in the next 20 years may be larger.
- 1 1 Use Alternative D to protect natural diversity.
- 1 1 Deer and elk do not contribute to the decline in aspen regeneration.
- 1 1 Page 4-21: 80,000 acres of juniper control is not "slight".
- 1 1 Only recreational and noncommercial cutting should be allowed.
- 1 1 Remove juniper from aspen and riparian.
- 1 1 Aspen should be better managed for health.
- 1 1 Protect meadows, mahogany, and aspen for bird study.
- 1 1 All of the 5,877 acres of forest need to be available for management.
- 1 1 If forest stands and old growth are not treated, mortality will result from stressed condition.
- 1 1 Identify the amount of acres managed for different attributes.
- 1 1 Can not comment to volumes without adequate data.
- 1 1 Another way to present the alternatives: Forest acres would be managed to maintain forest health and other characteristics.
- 1 1 Utilize existing roads when possible for timber harvest.
- 1 1 Consider local economy in decision making process.

I	S	OPINION/COMMENT
1	1	Page 4-15: Assumption that 10% of juniper would remain untreated does not match with Alternative B (80,000 acres) and is inconsistent with Appendix (page 377).
1	1	Page 2-20: There is no citation for decline in aspen in planning area.
1	1	The Nature Conservancy has included in its Columbia Plateau Plan of critical biodiversity sites: Steens/Alvord; Oregon Canyon Mountains; Owyhee Canyonlands; Succor Creek; Crooked Creek; Saddle Butte; Dry Creek; Alkali Gulch; Harper; Cottonwood Mountain; and Castle Rock.
1	1	Mountain mahogany is important and needs emphasized and protected from grazing, road construction, and other disturbance.
1	1	Aspen is important for onsite and ecosystem processes and needs protected (suckers are especially vulnerable to livestock).
1	1	Remove Forestry Objective 2 from plan. <i>Reasons:</i> (1) management goals are not achievable
1	1	Less juniper control under Alternative D will not meet stated objective.
1	1	Page 3-74: Monitoring approach fails to reflect a strategy for evaluating the objectives on whole planning area; does not ensure consistent evaluation, is not predictable or systematic, has no clearly defined reporting mechanisms. Evaluate ecological impacts of removing juniper on plant and animal communities; and map and define old growth juniper woodlands.

LETTER NUMBER: 029, 044, 041, 069, **075, 107, 109, 110**, 157, 180, **218**, 220, 233, 235, **241**, 257, **272, 273**

## VEGETATION

*Comments under this section are very specific.*

- |   |    |  |
|---|----|--|
| 5 | 15 | Control of weeds is paramount for watershed protection and needs to be addressed in more detail.   |
| 4 | 4  | Shrublands and grassland rehabilitation should use natives to benefit natural values and not livestock forage.   |
| 2 | 7  | Plan does not adequately describe the condition of the rangeland/use ECOSITE inventory.  |
| 2 | 7  | OHV, off-trail hiking, and livestock and pack animals are major causes of weed introduction and soil disturbance.  |
| 2 | 2  | Maintain nonnative seeding for purposes originally intended.<br>(1) there is no scientific basis for fragmentation: there are more than enough equivalent habitats |
| 2 | 2  | Support efforts to return BLM lands to a series of naturally and fully functional ecosystems.  |

I	S	OPINION/COMMENT
2	2	Advocate strong protection for native perennial grasslands. <i>Reasons:</i> (1) supports page 3-69 (1) prevent further degradation (1) restore vegetative complexity
1	1	Agree with emphasizing vegetation management that targets watershed and diversity and not Potential Natural Community (PNC).
1	6	The statement "manage big sagebrush habitat to emphasize plant and animal community health at the landscape level" fails to inform how the land will be managed.
1	6	The plan should describe management activities, where they will be carried out, the acreage treated, and what will occur if the objectives are not met.
1	6	Plan should describe the costs and outcome of the Vale Project.
1	6	Plan should be more specific on acreages to be planted with nonnative species.
1	1	Page 3-78: Change <i>should</i> to <i>must</i> regarding noxious weeds.
1	1	Page 4-42: Weed establishment <i>may</i> , change to <i>will</i> .
1	1	Page 2-10: Disagree that annuals are indicators of lost soil productivity. <i>Reasons:</i> (1) productivity remains in many areas, but perennial seed sources are absent
1	1	Page 2-10: Microbiotic crust function is portrayed as overly significant.
1	1	Page 2-10: BMPs: Object to open-ended provision; BLM has confused "Management Actions" with guiding principles.
1	1	Page 2-42: Incorrect to advocate shrub overstory. <i>Reasons:</i> (1) nature continually fragments the monoculture (1) diversity and edge support more wildlife (1) seedings were implemented for livestock forage
1	1	Desired Range of Future Conditions (DRFC) are vaguely defined.
1	1	Page 2-12: Map and table showing rangeland conditions and trend by ecological site is needed.
1	1	Page 378: Need to be more specific.
1	1	Page 3-68: Believes that managing fair or poor nonnative seedings would not improve structural and species diversity. <i>Reasons:</i> (1) because they have been invaded by sagebrush

I	S	OPINION/COMMENT
1	1	Page 3-69: At risk annuals should be converted to perennials instead of protecting using firebreaks.
1	1	Page 3-90: Modify monitoring statement for bighorns to all species of wildlife and wild horses.
1	1	Reseeding burns with 75/25% nonnative to native species does not result in monoculture of nonnatives (page 4-16-4-18).
1	1	Reseeding with sagebrush damages ecosystem when cover gets above 15%. <i>Reasons:</i> (1) outcompetes desirables (1) it is a direct attach on commodity producers
1	1	Explain how <i>Northwest Area Noxious Weed Control EIS</i> is consistent with goals of plan.
1	1	Discussion related to using "desirable" nonnative plant species should include: what species would be used, what species would be replaced, how is the strategy consistent with <i>Invasive Species Executive Order of February 1999</i> , what are the impacts on plant and animal communities, are nonnatives necessary to meet grazing objectives.
1	1	Use crested wheatgrass for rehabilitation when natives are unlikely to be successful.
1	1	There is no evidence that crested wheatgrass will dominate existing native plants.
1	1	Sagebrush protection in seedings is not a relevant issue so more management flexibility needs to be put in the plan.
1	1	Objective 1: The emphasis should be on ecological condition relating to site-specific and broader goals and objectives.
1	1	Objective 2: There is nothing wrong with the biological health of seedings; also, the biodiversity emphasis or protecting sagebrush is not backed by science.
1	1	Objective 3: Doing a site-specific plan following a major disturbance should dictate where to seed with nonnative plants. <i>Reasons:</i> (1) to benefit mosaic vegetation patterns to benefit multiple objectives
1	1	Under Alternative C, the at risk rangeland is an important issue and aggressive greenbelt establishment protects community health at the landscape level.
1	1	The primary source of soil organic matter in the high desert is associated with healthy grass and forb root growth and mass, not plant litter.
1	1	The loss of ground cover plants associated with late-seral juniper is the most visible issue of concern.
1	1	Increased bare ground occurs in older sagebrush stands along with reduced vigor in grasses and forbs under the canopy.
1	1	It is not beneficial to have large, continuous areas in these decadent condition.

I	S	OPINION/COMMENT
1	1	The plan does not include young juniper so flexibility and management language needs to be included in the preferred alternative.
1	1	Concerning DRFC and monitoring and the use of proper functioning condition (PFC), land monitoring should consider characteristics directly influenced by the land use.
1	1	Natural factors should also be monitored (i.e., natural disturbance factors and natural conditions).
1	1	Seeding of sagebrush is the most controversial and damaging to our ecosystem of any range management practice.
1	1	Sagebrush has always been and should always be considered a weed. <i>Reasons:</i> (2) outcompetes desirables (1) competes for water
1	1	To obtain desirable herbaceous species and animal representation, sagebrush cover should be managed at 12 to 15%.
1	1	An overabundance of big sagebrush destroys the herbaceous understory.
1	1	Intentional seeding of sagebrush should be curtailed immediately.
1	1	We support the concept of DRFC based on site potential.
1	1	Reseeding burns with nonnatives can increase species diversity.
1	1	Limiting use of nonnatives in Alternative C would increase spread of noxious weeds and nondesirable animals.
1	1	Native grasses are expensive and difficult to establish in low precipitation areas.
1	1	Standing bunchgrasses in low precipitation takes years to return to the soil.
1	1	Less juniper control and greater restrictions on grazing may take the land farther from resource objectives.
1	1	Page 4-73: There needs to be identification of levels of management for seral conditions.
1	1	Need to address whether or not juniper invasion will continue at the same rate with current livestock use level.
1	1	Page 3-16: Stating the BLM will "maintain or restore natural values while providing for forage production" is neither a standard or directive.
1	1	Suggest that vegetation management criteria be expanded to clarify FLPMA requirements.
1	1	Biodiversity and restoration of native perennials should not be at the cost of achieving FLPMA multiple use goals.
1	1	Address what is being done to restore lands in the Vale Project; and how new nonnative seedings differ so that they are less destructive.
1	1	Would like to see a distinction in status between <i>desirable introduced plant species</i> and <i>perennial native plant species</i> .

I	S	OPINION/COMMENT
1	1	Maintain, restore, protect Owyhee Mountain meadows and stands of mountain mahogany and aspen. <i>Reasons:</i> (1) critical for certain species of birds
1	1	Alternative B: "improving ecological condition and increasing forage production" are not compatible.
1	1	Protect Steens Mountain vegetation. <i>Reasons:</i> (1) so that unique plants do not need listed
1	1	Support maintaining shrub cover and structural diversity.
1	1	Plan is not specific enough in identifying which woody species need to be reduced to meet DRFC.
1	1	Do not burn low sagebrush. <i>Reasons:</i> (1) critical for pronghorn antelope and sage grouse
1	1	Support Objective 4 and 5 under Rangeland Vegetation.
1	1	Wyoming big sagebrush must be managed to meet the needs of sage grouse.
1	1	Alternative C does not provide adequate protection of upland shrub for wildlife; Alternative D is better.
1	1	The acreage of proposed sagebrush control is not included in rangeland vegetation section.
1	1	Page 3-71: Alternative C: Explain what happens on the remaining 30% of sagebrush habitat.
1	1	Page 4-140: para 2: Meadows are not <i>rare</i> on Steens Mountain.
1	1	Page 315: This section needs to include salt desert shrub, streamside riparian, meadows, wetlands, mountain brush, aspen, subalpine, and natural grasslands.
1	1	Page 3-16: Objective 1 Alternative C: Proposal is unreasonable. Where man-made seedings are in good to excellent condition, there is no need to improve them. <i>Reasons:</i> (1) leave well enough alone (1) continue to make use of seedings to improve surrounding native vegetation

LETTER NUMBER: **017, 030, 075, 093, 100, 103, 107, 149, 154, 157, 180, 218, 219, 222, 226, 232, 234, 235, 240, 241, 257, 269, 273**

### **SPECIAL STATUS PLANTS**

*Commentors expressed additional need to study, protect, and monitor to ensure survival of special status plants.*

- 4 4 Management actions and plant needs need fully understood and monitored before implementation.
- 2 2 Support Alternative C but increase monitoring.
- 2 2 Support Alternative D.
- 2 2 Rare plant sites should not be grazed.
- 1 1 Restore Malheur wire lettuce.
- 1 1 Leslie Gulch should receive management attention to protect remarkable plant sites.
- 1 1 Arrange plant names alphabetically by common name.
- 1 1 Protect rare plants through ACEC/RNA designations.
- 1 1 Page 2-20: Questions BLM's authority to "create" special lists.
- 1 1 Need to survey at least 75% of likely habitat within next 5 years.
- 1 1 Special status species should exclude those proposed for listing to reflect ESA limitations.

LETTER NUMBER: **030, 075, 080, 107, 109, 110, 218, 240, 241**

### **WILDLIFE**

*Respondents want more information on wildlife in the planning area and have numerous specific concerns.*

- 6 6 Must provide more information on wildlife; especially economic values, species regardless of profile, etc.
- 3 3 Consider adding Virginia's warbler to the special status species list.  
*Reasons:*
  - (1) declining in a limited range
  - (1) species inhabits public land during breeding season
- 3 3 Suggest adding certain species to Table 2-15 per information collected by Oregon Breeding Bird Atlas Project (see letter).
- 2 2 Need to address AUM allocations to wildlife under each alternative.
- 2 2 Protect Oregon's high desert for wildlife.
- 1 3 Elk are not native to Steens Mountain; reduce or remove.
- 1 3 Beavers have damaged creeks.
- 1 3 Deer populations have declined.
- 1 3 Mountain lion are increasing and devastate big game and cattle.

I	S	OPINION/COMMENT
1	1	Support Alternative D.
1	1	Support Alternative C (with equal emphasis to improving habitat for all wildlife).
1	1	Habitat needs of recreationally significant species not adequately addressed in Alternative C.
1	1	Appendix E: Calculations of wildlife AUMs is different than Three Rivers RMP; livestock AUMs are higher than they should be; further explain calculations.
1	1	Put wildlife habitat first over cattle.
1	1	Wildlife will move to private lands that are grazed if grazing is eliminated.
1	1	Manage planning area as a wildlife reserve.
1	1	Hungarian partridge populations are vulnerable to late-spring early-fall grazing; desert partridge are vulnerable to cattle foraging intensity.
1	1	Page 2-54: Sage grouse discussion lacks effects of hunting and predators and environmental factors.
1	1	Page 3-26: Objective is unattainable. <i>Reasons:</i> (1) impossible to manage equally for all species
1	1	Opposed to emphasizing bighorn sheep in Alternative C.
1	1	Page 3-70: Opposed to managing big sagebrush in seeding for wildlife. <i>Reasons:</i> (1) adversely impacts grazing (1) rationale is groundless
1	1	Map WLDF-1: Object to designating for elk winter range in Spring Mountain Allotment.
1	1	Map WLDF-2: Bighorn range inaccurate.
1	1	Wildlife analysis is outdated. <i>Reasons:</i> (1) huntable species dominate analysis
1	1	BLM has little information on nongame species population status and requirement.
1	1	Habitat evaluations were not conducted as part of plan.
1	1	No evaluation of mechanistic/community relationships within planning area.
1	1	In achieving ecosystem approach to land management, obtaining baseline data on wildlife species must be a BLM priority.
1	1	OHV use significantly impacts native wildlife species by habitat fragmentation, erosion, and weed dispersal.

I	S	OPINION/COMMENT
1	1	Plan fails to address impacts on arid low elevation sites which are least resilient, contain essential habitat for a diverse assemblage of reptiles and songbirds, and near rare plant sites.
1	1	Need complete inventory of herpitofauna and migratory songbirds in the salt desert shrub and Wyoming sagebrush habitats which are being degraded by OHV use.
1	1	BLM must recognize importance of late seral or PNC habitats and manage accordingly.
1	1	Plan must specify management actions that will be taken for bats, of which there are 7 BLM sensitive species in the Owyhee ecosystem.
1	1	Plan fails to analyze effects by watershed, fails to present sufficient data and analysis of wildlife, biodiversity and SS species to consider and analyze consequences of management actions.
1	1	Plan fails to recognize importance of dispersal and migration corridors, and how its actions fragment or connect habitat.
1	1	BLM should develop up-to-date biodiversity information on potential impacts as part of NSPA, including key ecosystem indicator species, critical habitats, and biodiversity objectives and management strategies.
1	1	Loss of sage brush cover have a negative impact on a variety of wildlife species, including mule deer, songbirds, sage grouse, and reptiles.
1	1	Need measurable standards for protection of sage grouse stubble height, leave at least 9" cover for nesting sage grouse.
1	1	BLM should coordinate with ODFW re: game management.
1	1	Page 4-21– 4-23: Level of juniper and sagebrush control would not meet wildlife needs under Alternative C as numerous species would be affected.
1	1	Page 4-66– 4-97: Impact analysis is inaccurate and inadequate in this section.
1	1	Page 4-23– 4-36: Alternative D: At these levels of brush control, wildlife needs may be met if constraints protecting key habitats are followed.
1	1	Page 4-81; para 5: Agree that wild horses pose impacts on wildlife water.
1	1	Page 4-92– 4-97: This type of detail on bighorn sheep is needed for other species.
1	1	Page 4-80: Impacts would occur where juniper is "normally patchy, rare, or absent" is inaccurate.
1	1	Page 315; para 3; sentence 2: golden eagles remain on the nest until midsummer before fledging.

LETTER NUMBER: 027, 031, 058, 078, **107**, **110**, 149, 157, 180, 200, 220, **226**, 231, **232**, 235, **241**, 266

## **SPECIAL STATUS WILDLIFE**

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I S OPINION/COMMENT

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*Commentors want to see a more complete inventory, discussion, and management of all species, regardless of glamour/profile, and want these species protected. Commentors want domestic sheep removed from bighorn sheep range, and in general, do not want livestock grazing to impact special status fauna.*

- 4 10 Remove domestic sheep from or near bighorn range.
- 4 4 Inventory, protect, and expand plan discussion of all fauna including mollusks, aquatic and terrestrial insects, bats, and other species, regardless of profile.
- 3 8 Page 2-55: Map WLDF-2 shows domestic sheep range overlapping bighorn range contrary to narrative.
- 2 7 Improving Alternative D could reduce chances of sage grouse being listed as endangered.
- Reasons:*
- (1) habitat has declined over several decades
- 2 2 Page 319: Add 6 species of bats to the list (on file in Burns District Office).
- 1 6 The plan fails to meet agency and Endangered Species Act (ESA) objectives for special status animals.
- 1 6 Alternative C fails to provide adequate attention to specific requirements of individual species.
- 1 6 Section 7 of ESA requires BLM to consult on the actions of the plan.
- 1 6 Increased military activity will cause stress to wildlife; especially sage grouse and bighorn sheep.
- 1 6 Appendix N: Fails to analyze or disclose what “adequate cover and height” is.
- 1 6 Appendix N: Fails to analyze or disclose what any of those broad parameters mean along the river.
- 1 1 Consider adding Virginia's warbler to the special status species list; Mahogany Ridge has potential habitat.
- Reasons:*
- (1) is declining in limited range
- 1 1 Special status species in allotments should receive allotment management plan (AMP) priority.
- 1 1 Support Alternative C; but increase monitoring.
- 1 1 Need more information on redband trout occupancy and habitat connectivity.
- 1 1 Commentor is contact for Oregon Breeding Bird Atlas Project.
- 1 1 Delineate critical habitats for threatened and endangered species and remove/restore grazing as necessary.
- 1 1 Do not drill any new water wells.

I	S	OPINION/COMMENT
1	1	Grazing privileges lost, retired, etc., should have AUMs held for watershed protection and wildlife habitat.
1	1	BLM should retain ownership of all range improvements.
1	1	Page 2-40: Redband trout habitat was inventoried in the Steens Mountains; include this data.
1	1	Grazing should not conflict with endangered species. <i>Reasons:</i> (1) public should not pay/subsidize private operators (1) fencing accommodates ranching industry and falls short of protecting fish habitat
1	1	ODFW suggests additional assessment of the proposed actions and their impacts on sage grouse in final plan.
1	1	ODFW suggests new lek inventories to assess impacts of management actions on sage grouse.
1	1	ODFW position on domestic sheep grazing permits is misinterpreted in Alternative D (page 4-95). <i>Reasons:</i> (1) supports retiring domestic sheep grazing or trailing permits within bighorn range (1) endorses BLM's 1998 <i>Revised Guidelines for Domestic Sheep</i>
1	1	Bighorn sheep ranges on Map WLDF-2 are inadequate for Andrews Resource Area (ARA); sheep have moved.
1	1	Table 3-1: Less emphasis should be placed on landscape level evaluation and more on monitoring of conditions and management of ecological conditions of specific habitats.
1	1	Objective 2: Intensive management is critical to bighorn sheep management.
1	1	Cattle grazing benefits bighorn sheep.
1	1	Table 2-15: Lists the Northern bald eagle as a documented breeder in the ARA.
1	1	White-tailed jackrabbit should be listed as a documented breeder in ARA.
1	1	Plan should address the restoration of extirpated species.
1	1	Page 2-53: Plan fails to acknowledge that eagle use in ARA is associated with Malheur Refuge.
1	1	Page 4-84: This information should be contrasted with alternatives D and E.
1	1	Bald eagles and peregrine falcons: historic and current nest sites should be addressed.
1	1	Appendix F; page 321: Should read that most breeding of white-faced ibis occurs on Malheur Refuge with occasional breeding on private land.
1	1	Alternative D must be adopted to protect special status animals.

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I S OPINION/COMMENT

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1 1 Oregon State status is not shown for special status animals.

LETTER NUMBER: 017, 069, 075, 080, 109, 110, 157, 180, 185, 210, 213, 218, 222, 223, 226, 232, 241, 254

## WATER/RIPARIAN

*Other riparian comments are found under the GRAZING and WILD AND SCENIC RIVER categories. Elimination and/or reduction of livestock grazing from riparian areas and river corridors was a common and dominating comment in many letters. These can be found under GRAZING. Comments here are subdivided into BLM Monitoring and Studies, Riparian Management, Other Riparian Area Comments, and Plan Specific Comments.*

### **BLM Monitoring and Studies**

3 3 Appendix D, Table D-3 is old data and should be replaced with trend plot data and 1998 PFC data in the final.

*Reasons:*

(1) old data indicates problems with riparian areas and new data indicates improvement on McCoy, Kiger, Cucamonga creeks

(1) Home, 3-Mile, Mud, Ankle, Big Indian Riddle, Deep, Yank Drake, and Little Kiger creeks also show improvement not captured in Appendix D

(1) communication with BLM indicates this is a correct observation

(1) include newest data in preferred alternative

2 2 Document status of riparian and stream habitat where it is still unknown.

*Reasons:*

(2) information is critical and tied to allotment summaries

2 2 Support 10 to 12" stubble height as standard to remove livestock in riparian pastures.

2 2 Page 18, para 7: Riparian is adversely affected by livestock is biased.

2 2 Support Alternative D for water, riparian, wetlands.

2 2 Existing grazing management does not need to change because almost all riparian trend is improving.

1 1 Appendix N: 3" stubble height is too short because most wildlife and riparian shrubs would be damaged at this level of use.

1 1 Monitor riparian pastures using utilization and condition of riparian areas not the uplands.

1 1 Include fish presence and fish habitat in PFC determination.

*Reasons:*

(1) not enough emphasis on vegetation

I	S	OPINION/COMMENT
1	1	Implement improved riparian plans using the plans BLM already has instead of waiting another 5 years to complete a different schedule of studies. <i>Reasons:</i> (1) studies/documents are expensive and should be implemented (1) allotments containing poor, fair, unknown should receive immediate consideration
1	1	Page 2-37–2-39: Trend change is ambiguous.
1	1	Include map of water quality limited streams in final plan.
1	1	Riparian condition is good with almost all trend positive in ARA. <i>Reasons:</i> (1) monitoring indicates upward trend
1	1	Wrong statement that groundwater studies are unavailable.
1	1	Groundwater studies are necessary to protect resources and determine trends in water quality in planning area.
1	1	Explain presence of hazardous materials or incidents of groundwater/surface water contamination in planning area; these areas and wells should be mapped.
1	1	In defining lentic and lotic systems there should be quantification of level of function needed for each parameter, to define minimum or optimum function of a system. <b>Riparian Management</b>
1	6	Livestock are the cause for almost all the 35 water quality limited streams.
1	6	Urge BLM to include specific directives in the final plan to achieve water quality standards. <i>Reasons:</i> (1) graze in riparian only if it meets state standard for water quality, and minimize fencing
1	6	Stating that BLM will “design treatments to enhance resource values and maintain commodity production by emphasizing treatments in riparian/wetland . . .” and “consider uses and activities occurring in surface waters and their entire associated watershed . . .” are neither standards or directives.
1	1	Need additional discussion about the effects of the prescribed burning program on riparian area. <i>Reasons:</i> (1) there have been serious adverse impacts to woody riparian species on Donner und Blitzen River due to burns; willows are needed for fish and macro invertebrates, and songbirds (1) these burns were not proactive as the plans says

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I	S	OPINION/COMMENT
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- (1) burning in riparian areas is contrary to the constraints in the Steens AMP Environmental Analysis that aimed to improve woody riparian cover
- 1 1 Page 3-82: Drop PFC; it is too subjective.
- 1 1 Strengthen Alternative C.
- Reasons:*
- (1) Objective 1 to focus on meeting water quality standard
- (1) Objective 2 management actions should only be allowed if they improve conditions or conditions remain neutral
- 1 1 Adopt Alternative D to recover riparian areas from grazing.
- 1 1 Remove livestock when they degrade stream habitat.
- 1 1 Eliminate grazing from all water quality limited streams.
- 1 1 Riparian vegetation should be larger part of riparian management program.
- Reasons:*
- (1) need riparian vegetation for neotropical migrant song birds
- 1 1 Resource management objectives are invalid and subjective.
- 1 1 Must manage for PNC; can not rely on riparian conservation area approach.
- 1 1 Agree with factoring site potential.
- 1 1 Riparian habitats should be top priority because they are critical for habitat and restoration.
- 1 1 Page 3-23: Narrow the definition to limited “portions” of affected streams.
- Other Riparian Area Comments**
- 1 1 Kiger Gorge Creek, Blitzen, and other streams and riparian zones are destroyed.
- 1 1 Page 2-42: Riparian areas may not always have trees, shrubs, etc.
- 1 1 Page 2-37: Use caution when comparing *reference streams* to *target streams*, and use other factors.
- 1 1 Page 2-42: All springs do not have unique assemblages of invertebrates.
- 1 1 Grazing is the cause of all water quality problems.
- 1 1 Special designations are not needed because riparian areas conditions are improving.
- Plan-Specific Comments**
- 1 1 Plan fails to state how it will protect water quality in grazed watershed.
- 1 1 Plan fails to protect and enhance habitat for Great Basin redband trout.
- 1 1 Plan fails to link water resources to the other categories, i.e., riparian areas/wetlands, forest and woodlands, energy and minerals, special management areas, fire management, recreation, and fish and wildlife.

LETTER NUMBER: 004, **075, 107, 109, 110**, 142, 157, 180, **183, 218**, 222, 223, **226, 232**, 235, **241, 257, 272**,

## **FISH**

*Comments on fish are very specific.*

- 1 6 The plan fails to assess impacts to fish habitat.
- 1 6 The plan does not say what the BLM intends to do to prevent the demise of native fish populations.
- 1 1 Fish could benefit from multiyear livestock exclusion to allow reestablishment of streamside trees.
- 1 1 Supports Alternative D for fish because of urgency of inventory, restoration, and monitoring.
- 1 1 Lack of trend data in 77.1% of riparian seems to conflict with ESA.
- 1 1 Monitoring should be detailed for special status species and used adaptively.
- 1 1 The fisheries discussion is inadequate for Blitzen Pasture.
- 1 1 The effect of increasing turbidity due to livestock in streams and bank shearing is not described adequately.
- 1 1 Page 2-53: Discussion should include information about Catlow redband trout and Catlow tui chub.
- 1 1 Page 3-25: Oppose Objective 2 because it gives priority to some uses over others.
- 1 1 Stronger wording needed in Alternative D is necessary for healthy fisheries.
- 1 1 RAIDS database should be reviewed for redband trout.
- 1 1 Table D-2: Oregon Canyon and Ten Mile Creek have hybridized Lahontan/hatchery trout. Line Canyon has Lahontan trout.
- 1 1 Page 2-25: Need map of fish bearing streams and table of fish habitat.
- 1 1 Page 4-20: No mention of fish in Alternative A, but is mentioned in alternatives B and C.
- 1 1 Page 4-60: Regarding 33 miles of fish habitat negatively impacted by wild horses; account for the miles in other alternatives and miles impacted by cattle.

LETTER NUMBER: **075, 078, 107, 109, 226, 232**, 235, **241**

## **WILD HORSES**

*Commentors are generally concerned about wild horse conflicts with other resources.*

- 1 1 Remove or reduce wild horses; they are exotics.
- 1 1 Page 4-98: ODFW does not support "adjusting" bighorn sheep populations to meet wild horse alternatives A and C.

I	S	OPINION/COMMENT
1	1	Wild horse populations should be managed to cause the least adverse impacts to native species.
1	1	ODFW opposed to adding Red Mountain North Pasture to Coyote Lake Herd Management Area (HMA).
1	1	Do not increase allowable horse numbers in Coyote Lake HMA because of possible impacts to threatened kit fox.
1	1	Document in general provides proper and effective management of horses.
1	1	Pages 3-30: alternatives A, D, and E do not meet requirements of stated objective.
1	1	Alternatives A and E do not meet requirements of the Horse and Burro Act.
1	1	There is no difference between references to water development in alternatives A and C; add statement in each case "to provide for water developments to assure a reliable water supply during drought years".
1	1	Page 3-92, 94: Section raises concerns of legality and need for water during drought; also, monitoring should include age and sex distribution.
1	1	Page 4-100: Alternative B should say <i>no emphasis</i> as opposed to <i>less emphasis</i> placed on providing livestock forage over wild horse forage.
1	1	Bighorn sheep and wild horse habitat competition should be better considered prior to the reintroduction of bighorn sheep into HMAs.
1	1	Page 4-98: List how many AUMs allocated to wild horses.
1	1	We support Alternative D for wild horses.

LETTER NUMBER: 157, 180, **234, 241**

## GRAZING

*Respondents express concerns about grazing as a major cause of resource degradation and do not support adaptive management. This section is subdivided into Comments Against Grazing/Adaptive Management; AUM Allocation Comments; Comments Supporting Grazing; Problems or Deficiencies of Plan Alternatives; Rationale, Objectives, Etc.; and Other Comments.*

- 41 51 Support specific, clear and sound standards and guidelines in lieu of adaptive management.

*Reasons:*

- (5) too vague, need clear grazing schedules
- (3) BLM lacks proper monitoring to enforce
- (3) allows ranchers to graze beyond permit limitation
- (2) BLM unable to enforce because of peer community pressure
- (2) flexibility in management allows continued resource degradation
- (1) until grazing becomes less of a BLM mission

- (1) only if BLM had a better track record of protecting natural resources
  - (1) leads to nonspecific proposed actions that are difficult or impossible to analyze
  - (1) timing, identification of management actions, description of proposed actions and proper analysis are missing
  - (1) ignores resource damage, BLM does not follow constraints that are a part of proposed action in NEPA documents
  - (1) fails to provide meaningful available information on rangeland conditions and trends to provide adequate baseline for public review and implementing adaptive management; use geographic information systems to produce maps to monitor trend of ecological condition
- 24 28 Against managing public lands for the economic benefit of the livestock industry at the expense of natural resources and values.
- Reasons:*
- (6) do not destroy unreplaceable areas for little value of livestock grazing
  - (2) Threatened and endangered species need to be protected over cattle interests
  - (1) recreation is as important to regional economy as ranching
  - (1) do not need more grazing land for cattle
  - (1) land belongs to all the public
  - (1) charge fair market value for AUMs
  - (1) stop "welfare" on the range
- 18 18 Livestock grazing has degraded ecological/natural values in general.
- Reasons:*
- (1) desert cattle are a small percentage of livestock industry
- 15 16 Eliminate grazing in riparian areas and wetlands.
- Reasons:*
- (5) to protect fish, habitat, and cover
  - (2) to restore riparian vegetation
  - (2) to restore lowered water table
  - (1) preserve for recreational use
  - (1) to reduce streambank erosion
  - (1) to improve water quality
- 14 15 Eliminate grazing in the Steens Mountains.
- Reasons:*

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I	S	OPINION/COMMENT
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- (1) inconsistent with wilderness and recreation values
- (1) to restore redband habitat
- 12 12 Reduce grazing in the planning area generally.
- 9 9 Eliminate grazing in other sensitive, pristine, perennial grassland areas.
- 8 13 Eliminate grazing in the planning area.
- 6 6 Livestock improvements have degraded resources.
- 6 6 Eliminate grazing in Owyhee WSR/Owyhee Canyonlands.
- 6 6 Livestock grazing has degraded natural resources.
  - Reasons:*
  - (1) at expense of other values
  - (1) is well documented
  - (1) biotic soil crusts are destroyed by cattle
- 5 10 Increase rangeland monitoring on grazing.
- 5 5 Eliminate grazing in Donner und Blitzen WSR.
- 5 5 Eliminate grazing in SMAs generally.
  - Reasons:*
  - (1) incompatible with values and uses
  - (1) too much resource damage
- 5 5 Eliminate grazing in areas in poor and fair condition (degraded).
- 5 5 Reduce grazing in riparian areas and wetlands.
- 4 4 Eliminate grazing in planning area generally.
- 4 4 Eliminate grazing in WSAs.
- 3 3 Eliminate grazing in Alvord Desert.
- 3 3 Reduce grazing in SMAs (ACEC/RNAs, WSAs, WSRs, etc.).
- 2 2 Eliminate grazing where degradation is evident.
- 2 2 Eliminate grazing in Pueblo Mountains.
  - Reasons:*
  - (1) inconsistent with wilderness and recreation
- 1 1 Thanks for excluding cattle from Little Blitzen and Indian gorges.
- 1 1 Rest from grazing/allow to recover: Jordan Craters.
- 1 1 Rest from grazing/allow to recover: Diamond Craters.
- 1 1 Rest from grazing/allow to recover: Owyhee Canyonlands/Owyhee WSR.
- 1 1 Rest from grazing/allow to recover: Trout Creek Mountains.

I	S	OPINION/COMMENT
1	1	Rest from grazing/allow to recover: Hawk Mountain.
1	1	Rest from grazing/allow to recover: Castle Creek.
1	1	Rest from grazing/allow to recover: Alvord Desert.
1	1	Livestock grazing has degraded fish and fish habitat.
1	1	Livestock grazing has degraded special status plants and/or animals.
1	1	Buy out or retire grazing allotments. <i>Reasons:</i> (1) because it is a better use of tax dollars
		<b>AUM Allocation Comments</b>
2	2	Include the range of AUMs by alternative. <i>Reasons:</i> (1) reader has no way of knowing the figure (1) use 3 to 5 year average listed by resource area (1) it is referred to numerous times in text but is absent (1) reader needs to compare what is allocated to livestock, horses, and wildlife (1) expand temporary nonrenewable grazing (TNR) discussion (page 4-105) by alternative (1) Page 4-107, para 10: Discuss how many AUMs by alternative
1	1	Appendix E: Remove because document states that no reallocation will be made.
1	1	Fails to consider a range of alternatives for the amount of livestock that will be considered. <i>Reasons:</i> (1) unclear how much grazing is planned (1) estimates are all within normal range of variation
1	1	Base allocations on poor years.
		<b>Comments Supporting Grazing</b>
6	7	Support adaptive management. <i>Reasons:</i> (1) with increased monitoring
5	5	Grazing should not be reduced. <i>Reasons:</i> (2) provides natural resource benefits (1) because it is in keeping with FLPMA, Taylor Grazing Act, and multiple use

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I	S	OPINION/COMMENT
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- (1) contributes to exotic weed invasions

(1) and identify timing of use
- 1 1 Jackie Butte permittees should have a larger voice in plan because they are permitted users.
- 1 1 Allow limited livestock production as a historical recognition of the ranching lifestyle as long as it does not impact the ecological integrity of the land.
- 1 1 Grazing does not harm endangered plants.  
*Reasons:*
  - (1) plants survived heavy grazing of the 1930's
- 1 1 A lack of grazing, fire, exotic weeds, are a hazard to native plants.
- 1 1 Certain forage seedings assist in implementing adaptive management adjustments during climatic fluctuations.
- 1 1 More flexibility needs to be put in the plan relative to increased levels of grazing.
- 1 1 TNR grazing should become permanent in appropriate areas.  
*Reasons:*
  - (1) improves site productivity
- 1 1 Recommends not limiting use in riparian to just early use.
- 1 1 Range condition has declined in only isolated areas under current management.
- 1 1 Fencing off or taking grazing land away from ranchers would be a "taking" under a split-estate provision.
- Problems or Deficiencies of Plan Alternatives, Rationale, Objectives, Etc.**
- 1 1 Appendix E: Lacks data.  
*Reasons:*
  - (1) needs to address current upland and riparian health issues by pasture
  - (1) unable to determine conditions of allotments
- 1 1 Page xiii: Livestock objective should be rewritten to reflect highest and best use under The Taylor Grazing Act and FLPMA.
- 1 1 Incorporate allotment implementation schedule into final.
- 1 1 Must analyze impacts of winter grazing on wildlife.
- 1 1 Must present and analyze additional alternatives.
- 1 1 DRFC is a value judgement and should not be used.
- 1 1 Preferred alternative should specify need for exclusion from grazing.
- 1 1 Statements like "riparian areas are often affected by livestock" are biased and inaccurate.
- 1 1 Page 2-10: Soil compaction may occur, but recovers by spring.

I	S	OPINION/COMMENT
		<b>Other Comments</b>
2	2	Pipe water to upland troughs to protect riparian.
1	6	The plan does not reveal criteria or assessment for determining areas not suitable for livestock grazing.
1	6	There is no discussion of cattle and sheep numbers, AUMs allocated, or how many livestock are currently grazing public land compared to the past.
1	6	The plan does not address impacts of livestock on plant community types or wildlife.
1	6	Appendix R: The section “Effects of Intensity and Season of Grazing” presents no standards that guide managers or inform public of actual management activities.
1	6	The loose description of adaptive management allows BLM status quo managing.
1	6	Environmental impacts of grazing are very inadequate.
1	6	Juniper reductions, burning, and spring development are only to increase forage for livestock.
1	6	Livestock grazing is the primary threat to natural and recreational values on Steens Mountain.
1	6	No scientific evidence given that ecosystem will improved without livestock reduction.
1	6	The plan provides no monitoring data to support any of its assertions.
		<i>Reasons:</i>
		(2) monitoring is not a funding priority
		(1) managers do not know how to put monitoring plan together
1	1	Appendix R: Incorrect opinion that “grazing in desert steppe communities is seldom necessary to meet objectives”; this is too generally applied.
1	1	Appendix S: Object to conditioning any grazing permit with any nonlisted species.
1	1	Unfair to require mitigation when SMAs are overlaid on permittee.
1	1	Delete “Wildlife Habitat Protection” BMPs because they are not relevant to soil and water protection.
1	1	Developed recreation BMP #2 is contrary to objectives.
1	1	Page 3-94: “Conditions and trends of resources affected by livestock” is ambiguous.
1	1	Page 4-16: Bitterbrush return interval is wrong.
1	1	Page 4-16: “Reduced structure leads to increased erosion” is wrong.
1	1	Alternative E adequately addresses impacts of vegetation manipulation.
1	1	Do not support chemical control of native vegetation.
1	1	Risks from noxious weeds are greater as grazing disturbs ecosystem.
1	1	Goal of livestock management should be to achieve PFC.

I	S	OPINION/COMMENT
1	1	Eliminate grazing by July 15 or earlier in all riparian/wetland areas to meet resource objectives.
1	1	Streambank trampling damage should not exceed 5% of streambanks yearly, stability standards must be established at 80 to 90%.
1	1	Establish 6" stubble height for vegetation at springs, seeps, and wet meadows.
1	1	Establish 6" stubble height at end of growing season in riparian areas.
1	1	Allow a maximum of 10% annual use of woody riparian vegetation.
1	1	Determine which streams in allotment are water quality limited and bring into compliance.
1	1	Allow a maximum of 30% annual forage use of key species.
1	1	Plant physiologic needs must be considered when determining season of use and stocking levels.
1	1	Bluebunch wheatgrass, and other bunch grasses, should not be grazed during critical growth phase.
1	1	Cryptogamic crusts in uplands must be healthy, monitored, and improved.
1	1	Terms and conditions of grazing permits should include: stocking rate, season-of-use, kind of livestock, deferment, rest, or other strategies that maintain good/excellent and improve poor/satisfactory vegetation communities and ecosystem function to achieve resource objectives.
1	1	Livestock operators should be accountable for failures to meet objectives.
1	1	No TNR livestock grazing should be allowed.
1	1	TNR guidelines need to be established.
1	1	Exclude livestock grazing on all areas determined to be unsuitable as per suitability analysis.
1	1	Establish facilities such as salt licks in already degraded sites.
1	1	Manage for late seral and PNC throughout the planning area.
1	1	Page 4-19: Livestock optimization will return more organic matter to soil than naturally decaying vegetation.
1	1	Decreased grazing will increase fire acreage and frequency.
1	1	Page 4-27, para 6: Commentor takes issue with "natural succession improves the condition of vegetation communities."
1	1	Crooked River Watershed has examples of recovering riparian areas (BLM should be commended).
1	1	Exclusion of grazing decreases streambank stability and plant vigor.
1	1	Proper grazing can enhance leaf area and vigor of plants which form soil and seedbeds.
1	1	Appendix N: Utilization levels, stubble height levels, season us use and other criteria should be consistent with type of year.

I	S	OPINION/COMMENT
1	1	Appendix N: There are new studies indication that short, stiff grass stubble filters sediments and forms streambanks better than taller grass.
1	1	Appendix N: Do not agree with mandatory rest. <i>Reasons:</i> (1) not consistent with adaptive management (1) rest should be more prescriptive
1	1	Chimney Allotment: there is a letdown fence keeping cattle out of the nonuse area.
1	1	Questions scientific proof that total exclusion of livestock would allow natural succession to improve conditions, including soil formation, and sedimentation.
1	1	Recommend that forbs be included in seed mixes. <i>Reasons:</i> (1) important in diets of a wide cadre of wildlife
1	1	Need to list a seed mix for range improvements.
1	1	Identify utilization levels keyed to survival of plant species least tolerant of grazing.
1	1	Plan needs to address management at the permittee level.
1	1	The plan should clarify that investments in crested wheatgrass seedings and other range improvements by BLM, permittees, and local government will be maintained.
1	1	The livestock management “program planning criteria” should be expanded to include rights and responsibilities imposed by Taylor Grazing Act.
1	1	AUM impacts should be clarified in Chapter 4, and described in more detail generally.
1	1	The cumulative and connected impacts of livestock reduction programs should be reviewed and discussed in more detail.
1	1	Adaptive management places more emphasis on NEPA than site specific actions.
1	1	Support Alternative D for grazing.
1	1	Grazing should be done responsibly.
1	1	Livestock exclusion areas need to be listed in final.
1	1	Purchase or retire grazing permits.
1	1	Grazing affects wildlife like noxious weeds affect the land; manage accordingly.
1	1	ODFW has vested interest in the acreage previously excluded from livestock by cooperative agreement or other management decisions.
1	1	Clarify intent re: ODFW cooperatively developed projects including list of projects proposed for abandonment.
1	1	A conservation approach to protecting public lands will not drive the small rancher out of business.

I	S	OPINION/COMMENT
1	1	Page 367: Home Creek: BLM is reluctant to remove cattle damaging riparian once cows are in the pasture; bank damage has been severe in past.
1	1	Appendix P: The proposed use past mid-July is unduly affects regrowth of vegetation. <i>Reasons:</i> (1) Researchers show little regrowth in south Steens Mountains in August
1	1	Page 368: Alternatives C and D: Alternative B is preferred over Alternatives C and D for riparian recovery.
1	1	Page 377: Riparian salt desert shrub and other habitats should be added.
1	1	Page 418: The trend was not up on Home Creek in Steens Pasture in 1998. <i>Reasons:</i> (1) BLM ignored utilization standards allowing severe overgrazing.
1	1	Page 422: Division fence is needed to improve Home Creek. The Stevens fence is not needed and poses a hazard to bighorns in the Catlow Rim area.
1	1	Page 423: Monitoring is critical for success of management actions regarding grazing; Home Creek need 5 years rest for recovery, and cattle must always be off by June 15 for proper regrowth (earlier during drought years).
1	1	Page 360: Grazing use proposed by alternatives is vague and needs “intensity of use”; no livestock numbers are proposed in any alternative for Fish Creek-Big Indian Allotment nor the South Steens Allotment.
1	1	Page 362: Stubble height will not meet needs of wildlife according to several professional biologists. Cover should be much greater and applies to Blitzen WSR and Catlow streams.
1	1	Page 366: The three-week period cited where wildlife cover would be inadequate is longer than stated, according to scientific literature.
1	1	Chapter 2-13, para 7: “Impacts of historical grazing were concentrated at low elevation” ignores the extremely heavy grazing by sheep at high elevation on Steens Mountain (take this in account for vegetation and wildlife).
1	1	Deferment of grazing should always following burning, and was not done in Steens Mountains in 1997.
1	1	Need to list domestic sheep AUMs.
1	1	Fence off areas that need protection.

LETTER NUMBER: 008, 011, 012, 013, 014, **017**, 022, 023, **028, 030**, 035, 040, 041, 043, 044, 045, 050, 051, 122,123, 124, 125, 126, 128, 129, 130, 131, 132, 133, 136, 139, 140, 141, 142, 147, 150, 151, 152, **153, 154**, 156, 157, 159, 160, 161, 165, **166**, 169, 170, 171, 173, 175, 177, 178, 179, 180, **181, 184**, 185, 187, 188, 189, 190, 191, 193, 195, 196, 198, 199, 201, 202, 203, 207, 208, 209, 210, 213, **214**, 216, **218**, 220, 222, 223, **226**, 230, **232**, 235, **240, 241**

## RECREATION

*The recreation comments are varied and may be found under other categories such as SPECIAL DESIGNATIONS. The majority of comments emphasize activities occurring on Steens Mountains which reduce impacts to the natural environment. Recreation is subdivided into Winter Use on Steens Mountain, Promote Naturalness, Recreation Facilities, Access/Roads/Transportation, and Miscellaneous.*

### **Winter Use on Steens Mountain**

- 4 4 Eliminate or severely restrict snowmobile use on Steens Mountain.

*Reasons:*

(1) there are other open areas nearby for this type of use

- 2 2 Keep loop road open.

- 2 2 Analyze impacts of snowmobiles and helicopter skiing on wildlife.

### **Promote Naturalness**

- 3 3 Encourage undeveloped types of recreation.

- 1 1 Canadian geese are harassed by boaters.

- 1 1 Recreation should not interfere with natural ecosystems.

- 1 1 Exclude recreation use only after documented resource damage or after public input.

### **Recreation Facilities**

- 4 9 Plan for increased recreation use on Steens Mountain.

*Reasons:*

(1) use shuttle buses with interpretive information

(1) opposed more parking lots/outhouses

(1) future development should be consistent with local plans and zoning

- 2 2 Support less developed facilities.

- 1 1 Support new recreation site establishment.

- 1 1 Opposed to resort at Fish Lake.

*Reasons:*

(1) destroys beauty and open space

### **Access/Roads/Transportation**

- 2 2 Plan should not impact public access to Steens Mountain.

- 1 1 Close Rooster Comb Road on Steens Mountain, leave two track roads open.

*Reasons:*

(1) there is enough access already

(1) strengthens wilderness experience

I	S	OPINION/COMMENT
1	1	Leave Steens Loop Road open.
1	1	No off-road restrictions that hamper livestock management.
1	1	Allow helicopter access.
1	1	Disallow helicopter use on Steens Mountain.
1	1	Maintain roads for access.
		<b>Miscellaneous</b>
1	1	No grazing at recreational sites.
1	1	Support special recreation management area (SRMA) for Succor Creek.
1	1	Plan is biased toward recreation use.
		<i>Reasons:</i>
		(1) visitor numbers are false and misleading
1	1	Recreation and livestock grazing are compatible.
		<i>Reasons:</i>
		(1) visitors like seeing cattle
1	1	Explain whether SRMAs decrease off-road uses.
1	1	Plan should include section on outfitter operation guidelines.
1	1	Recreation use dollars offset commodity losses, and impacts are less.
1	1	Under Pueblo Mountain SRMA discussion: WSA status is not mentioned.
1	1	Create next section of Desert Trail from Highway 97 to Malheur National Forest over BLM lands in Three Rivers and Andrews RAs (recognition as national recreation trail).
1	1	Recreation does not contribute to county tax base as much as livestock/agriculture.

LETTER NUMBER: 035, 080, **107**, 134, 140, 157, **166**, 170, 195, **218**, 223, 225, 229, **232**, 235, **240**, 259, 264

## OFF-HIGHWAY VEHICLES

*Most respondents are concerned about the impacts of OHV use and favor more restrictions.*

- |   |    |   |
|---|----|---|
| 7 | 7  | Close all or most areas to OHV use.             |
| 6 | 12 | OHVs should be restricted to designated trails. |
| 3 | 8  | Do not allow organized OHV events               |
| 3 | 4  | Support Alternative D for OHV use.              |
| 2 | 7  | Against Open OHV designations.                  |
|   |    | <i>Reasons:</i>                                 |
|   |    | (6) incompatible with BLM objectives            |

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I	S	OPINION/COMMENT
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- (1) problematical when riders must judge hard-to-identify resources
- |   |   |   |
|---|---|---|
| 2 | 2 | Close OHV use in sites containing rare plants, erodible soils, declining and unique plant and animal species.                         |
| 2 | 2 | Do not allow more acres Open to OHV use.  |
| 1 | 6 | Designating small amount of acres closed to OHV does not adequately protect wildlife habitat in the planning area.                    |
| 1 | 6 | No more than 1% of the planning area should be Open.  |
| 1 | 1 | Close Alvord Desert to OHV use.   |
| 1 | 1 | OHV use increases spread of weeds; oppose Alternative C.  |
| 1 | 1 | Closing or limiting use on 2-track roads should be based on biological need with public input, as per NEPA.                           |
| 1 | 1 | Threats from OHV recreation are serious; use should be controlled.  |
| 1 | 1 | OHV use in the Oregon Trail corridor does not damage the resource as much as hill climbing and other uses.                            |
| 1 | 1 | Right-of-way avoidance in place of ACEC designation for the Oregon Trail.   |
| 1 | 1 | OHVs negatively impact vegetation.  |
| 1 | 1 | BLM should better educate people on the importance of OHVs.   |
| 1 | 1 | Concerned about OHV use in Succor Creek and Anderson Crossing.  |
| 1 | 1 | NCA designation on Steens is too exclusionary for OHV users.  |
| 1 | 1 | Consider seasonal closures and trail designation in lieu of closures.   |
| 1 | 1 | Access to back country should be reasonable.  |
|   |   | <i>Reasons:</i>   |
|   |   | (1) remedial management instead of closure  |
|   |   | (1) use partnerships  |
|   |   | (1) Use Oregon's ATV Accounts Allocation Committee funding  |
| 1 | 1 | Pages 2-66–2-67, Tables 2-23, 2-24: These contradict each other.  |
| 1 | 1 | Appendix H: Challenge and risk opportunities are important, contrary to statement.  |
| 1 | 1 | Economic Impact study by Ashley (1993) and Johnson (1995) are flawed; reference Rebecca John of Oregon State University on new study. |
| 1 | 1 | Resource values that need to be protected need to be listed in page xiii, objectives, OHV.  |
| 1 | 1 | Baseline data should include PM10 monitoring sites, especially in area of commercial, competitive, and other OHV activities.          |
| 1 | 1 | Soil maps need to be completed as part of the baseline data (page 2-10).  |
| 1 | 1 | Cost model, rehabilitation plan for cross-country land use would be helpful in the monitoring section.                                |

I	S	OPINION/COMMENT
1	1	Areas of microbiotic crusts need to be included on baseline surface disturbance maps.
1	1	Clarify meaning that less restricted use will not impact resources.
1	1	No management practice stated in the plan which protects soil, vegetation, air quality, and other resource values from OHV use.
1	1	No section analyzing the environmental consequences of the management practices to soil.
1	1	Unclear what the resource management plan for these lands really is.
1	1	More information is needed to show how Open areas meet the OHV management objective.
1	1	Explain the difference: OHV use limited to existing roads and OHV use limited to designated roads.

LETTER NUMBER: 004, 022, **030**, 044, 080, **107, 110**, 157, 180, 195, **218**, 223, **232, 241, 271, 272**

## VISUAL RESOURCE MANAGEMENT

*This section received very few comments.*

- |   |   |  |
|---|---|--|
| 1 | 1 | Important to manage Pickett Rim and P Hill areas as Class II; explain why Pickett Rim needs to be changed. |
| 1 | 1 | We support Alternative D for VRM.  |
| 1 | 1 | VRM is subjective and unscientific.  |
|   |   | <i>Reasons:</i>  |
|   |   | (1) depends on who is viewing  |
|   |   | (1) observers may lack knowledge about site ecology  |
| 1 | 1 | VRM is the overriding factor in Standards for Rangeland Health and Guidelines.                             |
| 1 | 1 | Disagree with VRM classes for Mahogany Mountain Allotment.   |

LETTER NUMBER: **107, 166**, 217, **241**,

## WILDERNESS STUDY AREAS

*All of the wilderness comments below support wilderness values and objectives. They do not support grazing developments or impacts in WSAs. Other wilderness comments are found under the SPECIAL DESIGNATION category.*

- |   |   |  |
|---|---|--|
| 3 | 8 | Manage WSAs for wilderness values first, not for private livestock operations. |
|   |   | <i>Reasons:</i>  |
|   |   | (1) not public duty to make private operations economically feasible           |
|   |   | (1) not congressional intent   |
| 2 | 7 | Prohibit livestock structures including fences (violation of FLPMA).           |

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I S OPINION/COMMENT

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- 2 7 Need a reinventory of BLM lands by outside experts.
- Reasons:*
- (1) focus on overlooked lands
  - (1) access newly acquired state or private inholdings
  - (1) less bias
- 2 7 Prohibit construction of Lauserica and Stephens fences.
- Reasons:*
- (2) reduces natural character of WSAs
- 2 7 Support recommendation of land adjacent to WSAs to be acquired and added to existing WSA.
- 1 6 Prohibit livestock in WSAs where monitoring shows a decline in ecological condition.
- 1 6 Livestock grazing, livestock structures, and unabated presence of livestock degrade ecological and wilderness values. These also render the lands and adjacent lands less suitable for designation.
- 1 6 Prohibit OHVs.
- 1 6 If P Hill area loses WSA status (Alternative C), it would be difficult to maintain original landscape quality.
- 1 6 Support Leslie Gulch wilderness designation.
- 1 6 Support Sierra Club recommendation for wilderness designation.
- 1 6 Apply VRM and ORV classes to lands released from wilderness consideration.
- 1 6 Released WSA lands should be protected from mineral/energy entry.
- 1 1 Adaptive management will not protect/restore high desert wilderness.
- 1 1 Overlapping plans on Steens Mountain is confusing and vague.
- 1 1 Want a report of numbers, kind of structures, developments in WSAs since designations with rationale for how this enhances wilderness values.
- 1 1 Protect wilderness for future.
- Reasons:*
- (1) important for physical challenge
  - (1) important for spiritual sustenance
- 1 1 The Honeycombs and Owyhee Canyon wilderness should be expanded.

LETTER NUMBER: 011, 049, 058, 157, 210, 217, 223, **232**,

## **WILD AND SCENIC RIVERS**

*Most commentors favor an increase of WSR miles over the agency's preferred alternative.*

I	S	OPINION/COMMENT
18	19	Alternative C is inadequate for the number of miles proposed.
8	14	Support Alternative D and recommend that all inventoried and assessed river miles be added to the WSR system.
6	6	All streams that fit the WSR criteria should be designated.
3	3	Do not allow livestock grazing in WSRs.
2	7	The plan is insufficient as NEPA analysis for revision of Donner und Blitzen Management Plan.
1	6	Without WSR protection, streams are at risk for riparian degradation.
1	6	Appendix N: Alternative C fails to state where proposed fences would be located.
1	6	Alternative C: Fails to define what "early season" means.
1	6	Plan fails to analyze/disclose whether trailing will inhibit benefits of rest.
1	6	Plan fails to analyze the range of naturally high water.
1	6	Plan fails to analyze/disclose what "medium stubble height" means.
1	6	Plan fails to analyze/disclose "palatable" species in the Blitzen Pasture.
1	6	Plan fails to analyze/disclose the relationship between mean stubble height and most palatable species.
1	6	Plan fails to analyze how any plant species will be fully protected and enhanced by a standard such as stubble height.
1	6	Plan fails to analyze/disclose whether the young trees in the meadows are developing due to rest from prolonged grazing.
1	6	Alternative B: Utilization standards are too general and unspecific to restore vegetation in the pasture.
1	6	Alternative C: Plan fails to analyze relationship between stubble height and plant communities.
1	6	The analysis, consideration, and disclosure of water quality issues on the Donner und Blitzen WSA is inadequate.
1	6	The plan fails to consider and disclose that designation of a "water quality limited" stream means that "best management practices" have been determined to be inadequate to achieve water quality standards.
1	1	Do not support WSR designation for Dry Creek.
1	1	Support adaptive rotational grazing management in WSRs.
1	1	Jackies Butte permittees want their statements regarding WSR plans considered for plan.
1	1	Against closing Deary Pasture on Owyhee WSR to livestock grazing.

*Reasons:*

(1) Cattle do not damage ORVs

(1) Cattle improve wildlife habitat

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I	S	OPINION/COMMENT
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- |   |   |  |
|---|---|--|
| 1 | 1 | WSR status for Owyhee River below the Dam should be rejected.<br><i>Reasons:</i><br>(1) because of road maintenance responsibility<br>(1) BLM restrictions on road maintenance |
| 1 | 1 | Do not support new WSR designations.   |
| 1 | 1 | Support maintaining the status for Donner und Blitzen as Wild.   |
| 1 | 1 | There is no adequate justification relative to legal requirements, characteristics, or need of any of the WSR alternatives.  |
| 1 | 1 | Eligibility assessment of rivers and streams in Malheur and Jordan RAs is incorrect with listed issues.<br><i>Reasons:</i><br>(1) wildlife leave when cattle are removed       |

LETTER NUMBER: 014, 018, **028**, 035, 049, 052, 053, 058, 059, **075**, 077, 079, 081, 086, 087, 089, 098, 102, **110**, 112, 120, 123, 157, 163, **166**, 179, 205, **218**, 223, **232**, **241**, 255, 259, 260, 264

## SPECIAL DESIGNATIONS

*Comments are very specific and relate to ACEC/RNAs and Steens Mountain.*

- |   |    |  |
|---|----|--|
| 6 | 7  | Support NCA for Steens Mountain.   |
| 5 | 10 | Exclude/reduce livestock grazing in Steens.  |
| 5 | 5  | Prefer Alternative D for ACECs.<br><i>Reasons:</i><br>(1) because of the additional acres needed<br>(1) to minimize grazing impacts<br>(1) because of NSO status   |
| 5 | 5  | NCA designation should be separate from plan.  |
| 4 | 9  | Support NCA for Steens and include Alvord Desert.<br><i>Reasons:</i><br>(1) they are integrally tied<br>(1) large enough area to manage from a landscape approach<br>(1) major issues involve both areas |
| 4 | 9  | The NCA proposal contains no clear approach or planning and nothing to evaluate.   |
| 4 | 6  | Do not support NCA for Steens.<br><i>Reasons:</i><br>(1) too much private land within  |

I	S	OPINION/COMMENT
		(1) too many unknowns of legislation
		(1) states that BLM would manage wildlife
4	5	Retain all ACECs and designate recommended ACECs.
3	4	Steens Mountain needs permanent federal protection.
3	3	Keep Pickett Rim as an ACEC.
		<i>Reasons:</i>
		(1) for wildlife, plants, and ACEC and VRM status
3	3	Oppose proposed additions to ACECs.
		<i>Reasons:</i>
		(1) not consistent with legal authority
		(1) not needed on well-managed lands
3	3	Mahogany Ridge ACEC/RNA: Support Alternative B.
		<i>Reasons:</i>
		(1) too much private land within
3	3	Owyhee Views ACEC: Support Alternative B.
2	2	Need for ACECs should document a biological issue or management problem.
2	2	Oppose designation of ACECs.
2	2	Steens are of vital interest for recreation.
2	2	Jordan Craters ACEC/RNA: Support Alternative D.
		<i>Reasons:</i>
		(1) to enlarge to the full extent of lava flow
2	2	North Fork Malheur River ACEC: Support Alternative C.
		<i>Reasons:</i>
		(1) links Blue Mountains and Owyhee Uplands Province, rare trout and vegetation transition site
2	2	Castle Rock ACEC: Support Alternative C.
		<i>Reasons:</i>
		(1) site fulfills several natural area cells
2	2	Coal Mine Basin ACEC/RNA: Support Alternative C.
2	2	Coal Mine Basin ACEC/RNA: Support Alternative B.
2	2	Keep Alvord Peak an ACEC.
1	6	The NCA proposal in Alternative C fails to protect the area.

I	S	OPINION/COMMENT
1	6	We urge the BLM to offer thorough discussions of various proposals for protection of Steens Mountain.
1	6	We are pleased to see the BLM is adding over 28,000 acres to Steens Mountain ACEC.
1	2	The Pickett Rim ACEC should be expanded.
1	2	The BLM should provide landowners and business owners in the proposed NCA a copy of NCA-HR-100-24, along with positive and negative impacts.
1	1	Give Lone Mountain special designation.
1	1	Alvord Desert is of vital interest for recreation.
1	1	Frenchglen is of vital interest for recreation.
1	1	Mount Whitney is of interest for recreation.
1	1	OHV restrictions in ACECs need to be clarified.
1	1	Cryptobiotic crusts should be mentioned in the description of Leslie Gulch ACEC.
1	1	Owyhee River ACEC should not be dropped because of WSR designation.
1	1	Grazing impacts in ACECs appear to be the same for Alternative C as for Alternative A; concerned that the 1998 ONHP document was not used in the draft.
1	1	Oppose ACEC designation for Hammond Hills.
1	1	Oppose designation for Owyhee Views ACEC.
1	1	The existing Oregon National Historic Trail be designated as a SRMA instead of ACEC.
1	1	The Nature Conservancy (TNC) should not be paid to inventory for potential RNA/ACECs.
		<i>Reasons:</i>
		(1) sites are not rare and endangered
		(1) locals and government are not included
		(1) nonlocal environmental organizations are driving decisions
		(1) no more designations until locals want it
		(1) expertise of TNC is in question
		(1) TNC can be biased
		(1) BLM should have no control over private land
1	1	Oregon Trail ACEC: against designation.
1	1	Oregon Trail Keeney Pass ACEC: Support Alternative B.
1	1	Oregon Trail-Tub Mountain Segment: Support Alternative B.
1	1	Oregon Trail ACEC Birch Creek Segment: Support Alternative C.
1	1	Against ACEC/RNA designations per Malheur County Court 1996 position regarding vegetative communities and plant cells, etc.

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I S OPINION/COMMENT

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*Reasons:*

(1) deviates from multiple use

(1) present management is compatible with well-being of the identified vegetative communities

1 1 Support Alternative B on ACECs and RNAs.

1 1 Honeycombs ACEC/RNA: Support Alternative C.

1 1 Leslie Gulch ACEC: Support Alternative C.

*Reasons:*

(1) faulty rationale

1 1 Mahogany Ridge ACEC/RNA: Support Alternative D.

*Reasons:*

(1) give greater representation of the target natural community and add diversity because species are mostly on private lands

1 1 Stockade Mountain ACEC/RNA: Support Alternative B.

1 1 Stockade Mountain ACEC/RNA: Support Alternative D.

*Reasons:*

(1) adds diversity to western juniper and low sagebrush types

1 1 Black Canyon ACEC/RNA: Favor ACEC, but not RNA.

1 1 Dry Creek Gorge ACEC: Favor ACEC from Juniper Creek to cave.

1 1 Dry Creek Gorge ACEC: Support Alternative D.

*Reasons:*

(1) scenery, geology that supports salt desert shrub communities

1 1 Hammond Hills ACEC/RNA: Support Alternative B.

1 1 Hammond Hills ACEC/RNA: Support Alternative D.

*Reasons:*

(1) threat of mineral leasing and importance of NSO stipulations

(1) excellent representation of sandy soil alkali communities

1 1 Lake Ridge ACEC/RNA: Support Alternative B.

1 1 Lake Ridge ACEC/RNA: Support Alternative D.

*Reasons:*

(1) lands contain best low sagebrush/bluebunch wheatgrass, and silver sagebrush/Nevada bluegrass playa vegetation

1 1 North Ridge Bully Creek ACEC/RNA: Support Alternative B.

1 1 North Ridge Bully Creek ACEC/RNA: Support Alternative D.

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I S OPINION/COMMENT

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*Reasons:*

(1) great representation of plant communities which need protection from grazing

- 1 1 Ott Mountain ACEC/RNA: Support Alternative B.
- 1 1 Owyhee below the Dam ACEC: Neutral.
- 1 1 South Alkali Sand Hills ACEC: Support Alternative B.
- 1 1 South Alkali Sand Hills ACEC: Support Alternative D.

*Reasons:*

(1) protects two sensitive plant species with maximum habitat and management latitude

- 1 1 South Bull Canyon ACEC/RNA: Support Alternative B.
- 1 1 South Ridge Bully Creek ACEC/RNA: Support Alternative B.
- 1 1 South Ridge Bully Creek ACEC/RNA: Support Alternative D

*Reasons:*

(1) high quality plant communities with diversity and acreage

- 1 1 Spring Mountain ACEC/RNA: Support Alternative C.
- 1 1 Spring Mountain ACEC/RNA: Support Alternative B
- 1 1 Spring Mountain ACEC/RNA: Support Alternative D.

*Reasons:*

(1) potential to represent a suite of aspen communities (support exchange for willing sellers)

- 1 1 Owyhee River ACEC: Support Alternative C.
- 1 1 Saddle Butte ACEC: Support Alternative C.
- 1 1 Whitehorse Butte ACEC: Support Alternative C.
- 1 1 Dry Creek Bench ACEC/RNA: Support Alternative B.
- 1 1 Dry Creek Bench ACEC/RNA: Support Alternative D.

*Reasons:*

(1) larger acreage needed to act as buffer

- 1 1 Little Whitehorse Creek ACEC/RNA: Support Alternative C.
- 1 1 Little Whitehorse Creek ACEC/RNA: Support Alternative D.

*Reasons:*

(1) benchmark area for low elevation riparian need additional protection

- 1 1 Mendi Gore ACEC/RNA: Support Alternative C.
- 1 1 Mendi Gore ACEC/RNA: Support Alternative D.

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I S OPINION/COMMENT

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*Reasons:*

(1) additional acreage for important plant representations

1 1 Three Forks ACEC/RNA: Support Alternative C.

1 1 Three Forks ACEC/RNA: Support Alternative D.

*Reasons:*

(1) designation will better recognize some representations and has other attributes

1 1 Toppin Creek Butte ACEC/RNA: Support Alternative B.

1 1 Toppin Creek Butte ACEC/RNA: Support Alternative D.

*Reasons:*

(1) added diversity that Bull Flats provides

1 1 Page 3-41: Oppose expanding existing WSAs.

*Reasons:*

(1) BLM has already recommended them to Congress

1 1 Alvord Desert ACEC: Support D, but full extent of playa should be included.

*Reasons:*

(1) recognizes complete extent of Alvord and benefit from resulting level of management

1 1 Borax Lake ACEC: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 East Kiger Plateau: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 Little Blitzen ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 Little Wildhorse ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 Mickey Basin ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 Pickett Rim ACEC: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 Pueblo Foothills ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 Rooster Comb ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 South Fork Willow Creek ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry).

I	S	OPINION/COMMENT
1	1	Steens Mountain ACEC: Support Alternative C (with addition of withdrawal for mineral entry).
1	1	Tum Tum Lake ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry).
1	1	Fir Groves ACEC: Support Alternative C (with addition of withdrawal for mineral entry).
1	1	Mickey Hot Springs: Support Alternative C (with addition of withdrawal for mineral entry).
1	1	Serrano Point ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry).
1	1	Big Alvord Creek ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry).
		<i>Reasons:</i>
		(1) quality examples of natural communities
1	1	East Fork Trout Creek ACEC/RNA: Support Alternative C, with extension of boundary to ridge to ensure protection of wetland/riparian areas.
1	1	Steens and Owyhee Canyonlands should be national parks or monuments.
1	1	NCA designation could severely impact cattle industry.
1	1	Fire suppression should be reduced in NCA.
1	1	Need to add P hill and Pickett Rim to NCA proposal.
1	1	ACEC needs have not been justified.
1	1	It is not appropriate to have ACECs for visual or other subjective criteria.
1	1	Management should not be referenced as a purpose for ACEC establishment.
		<i>Reasons:</i>
		(1) Historic grazing did not damage their value
		(1) grazing use is fundamental to biological needs
1	1	It is not clear how many ACECs have been established for plant or animal habitats.
1	1	It is not clear which plant or animal ACECs will have grazing, recreation, or mining as secondary objectives.
1	1	It would be useful to identify where conflicting management actions in ACECs may occur.
1	1	Acceptable levels of change need to be identified in ACECs.
1	1	ACECs in Bully Creek should include aspen in shrub steppe mosaics.
1	1	Long Draw ACEC/RNA: Extend boundary consistent with landscape to better protect sandy soil plant communities.

LETTER NUMBER: **016, 017**, 022, **075**, 094, **103**, 104, **107, 109, 110**, 122, 123, 124, 130, 157, 163, 165, **166**, 172, 179, 180, 217, **218**, 220, 222, **226, 232**, 235, 237, 238, **240, 241**, 256, 257, 258, 259, 262, 264, **272**,

## HUMAN USES AND VALUES

*There were very few comments on this section; some comments may be under GRAZING or GENERAL COMMENTS.*

- 1 1 Tribal economy and use was not represented in this section.
- 1 1 Support Alternative D.
- 1 1 Data selection and analysis is biased towards livestock producers.

*Reasons:*

(1) inflates economic importance of grazing

(1) generally flawed

- 1 1 Fails to recognize increased recreation use as result of decreased grazing.

LETTER NUMBER: **110, 227, 241**,

## CULTURAL RESOURCES

*The Burns Paiute Tribe requests that cultural resources be considered and protected fully when planning and implementing public land actions.*

- 2 2 The Burns Paiute Tribe encourages the BLM to record cultural plant distribution during project surveys.
- 2 2 Alternative C shows little or no Native American recognition.
- 1 1 Number of cultural sites is in error.
- 1 1 Do not mix permanent sites with temporary sites.
- 1 1 Page 1-17: "Malheur Reservation was largely abandoned by the Northern Paiutes in 1878 during hostilities" is not correct and serves no purpose in this document.

*Reasons:*

(1) implies that the Northern Paiute left on their own choice, which was not the case

- 1 1 Page 2-80: regarding "No American Indian subsistence areas have been identified": reword sentence.
- 1 1 The Burns Paiute Tribe is in support of the Castle Rock ACEC nomination.
- 1 1 The Burns Paiute Tribe encourages closure of Castle Rock ACEC nomination.

*Reasons:*

(1) for sacred and subsistence reasons

I	S	OPINION/COMMENT
1	1	The Burns Paiute Tribe encourages closure to Castle Rock and Steens Mountain to mineral use.
1	1	Cultural Resources are not specifically considered in the VRM section.
1	1	The visual impact to cultural resources should be considered during management actions.
1	1	Support Alternative D.
1	1	Commend BLM for restoring requirements for clearances for fence construction.
1	1	Restore impacted cultural plant communities in plan.
1	1	Protect cultural resources from grazing impacts in consultation with State Historic Preservation Office and National Historic Preservation Act.
1	1	Support Objective 3, Alternative B.
1	1	ODFW requests additional clarification language stating that legal hunting and fishing activities are allowed.
1	1	Resource Advisory Council promotes improving communication with tribes.

LETTER NUMBER: **030**, 157, 180, **182**, **218**, **227**, 238, **241**,

## LANDS AND REALTY

*Comments are specific and few.*

3	8	BLM should acquire private land within Zone 1.
2	8	Public land within Zones 1 and 2 should be retained.
2	3	BLM should not restrict or control access to private land.
1	1	We agree with ownership consolidation as long as land values, total private ownership, and farming is protected.
1	1	The purpose for tenure adjustment needs to be emphasized in Alternative C.
1	1	The plan must be changed to allow land exchanges in all areas of the plan.
1	1	<i>Consolidation of land with high profile values</i> should replace <i>retain</i> in all of the alternatives.
1	1	BLM should not be in the business of increasing holdings at the expense of private sector.
1	1	Local planning discussion should be expanded to include zoning, policies, and goal requirement.
1	1	Support Alternative D for Lands and Realty.
1	1	A clean-up program should be started on public lands to remove fences, culverts, close roads, etc.
1	1	We are opposed to substantial net loss of public lands.
1	1	Increase the legal access to public lands.

I	S	OPINION/COMMENT
1	1	Page 367: Para 6 should read as to what activities on private land might adversely impact land resource values.
1	1	Commentor is interested in specific lands to purchase or exchange.
1	1	Land tenure adjustments seem restricted in Steens Mountain area.
1	1	Pursue land acquisition of private inholdings on Steens Mountain and roadless areas.

LETTER NUMBER: 036, **107**, 157, 180, **218**, 222, **232**, 237, 239, **240**, **241**, 247,

## SPECIFIC SITES

*Comments are various and very specific.*

- |    |    |   |
|----|----|---|
| 16 | 19 | Steens Mountains should be allowed to recover from grazing.   |
| 12 | 13 | Alvord Desert should receive increased protection/national designation.<br><i>Reasons:</i><br>(1) because of unique geology and rare plants and animals   |
| 7  | 7  | Blitzen: Reduce grazing.  |
| 7  | 7  | Protect Owyhee River (general protection statement).  |
| 6  | 6  | Owyhee River system is of special interest and needs further protection from livestock.   |
| 5  | 5  | Steens Mountain is important and needs increased protection/national designation.   |
| 4  | 12 | The Owyhee Canyonlands is a national-class area and needs increased protection/and or national designation.   |
| 3  | 3  | Antelope Creek: Change the west boundary of proposed WSR (J19) about 6 miles east to east boundary of Campbell Allotment.<br><i>Reasons:</i><br>(1) protects both private and public lands<br>(1) people will try to access the new area with numerous problems anticipated |
| 3  | 3  | Endorse overlook interpretive center at P Hill.   |
| 2  | 2  | Donner und Blitzen is of special interest and needs further protection from livestock.  |
| 2  | 2  | Trout Creeks are of special interest and are being damaged by livestock.  |
| 2  | 2  | Snively should be day use only.   |
| 2  | 2  | Leslie Gulch should be allowed to recover from grazing.   |
| 2  | 2  | Hart Mountain is of special interest.   |
| 1  | 2  | Owyhee below the Dam and Birch Creek Ranch: Do not develop, except for parking.   |
| 1  | 1  | Arock Allotment has no riparian areas; terrain prevents cattle from grazing the river.  |
| 1  | 1  | Pleased about grazing programs in Trout Creek Mountains, Oregon Canyon Mountains, Pueblo Mountains, and Roaring Springs Ranch Conservation Agreement.   |

I	S	OPINION/COMMENT
1	1	Complete Lauserica and Stephens fences as soon as possible.
1	1	Lauserica fence was covered as an Environmental Assessment; removed from Appendix.
1	1	Trout Creek and Oregon Canyon Mountain: Mud Springs, Twin Peaks, and Wood roads should remain open.
1	1	Pueblo Mountains: Arizona Creek road should remain open.
1	1	Support ADM consistent with Standards and Guides for Donner und Blitzen and Riddle Brothers Ranch.
1	1	Pueblo Mountains are of special interest.
1	1	Concerned about past and present damage to desert lands.
1	1	This document does not support the need for another special designation for the Steens Mountain Area.
1	1	Oregon Trail ACEC/Keeney Pass: Do something about trash, weeds, and OHV use.
1	1	Ruts on Lytle Boulevard were machine made.
1	1	Mahogany Mountain and Spring Mountain allotments are suitable for livestock use.
1	1	Object to elk objective of 1,000 and the mule deer and pronghorn objectives, in the High Desert Hunter Unit.
1	1	Alpine habitats are of special importance and fragile and need extra consideration.
1	1	Volcanic ashbed habitats should be withdrawn from mineral entry.
1	1	Do not change status of Owyhee below the Dam.
1	1	Reduce grazing on Malheur Refuge.
1	1	Reduce grazing on Fields.
1	1	No major facilities development on Owyhee River and reservoir.
1	1	Highly erodible soils should be identified specifically.
1	1	Object to increasing shrubs on Mahogany Mountain and Spring Mountain Allotments.
1	1	Riddle Creek is not part of Harney-Malheur Lake drainage.
1	1	Riparian condition and trend for Riddle Creek is outdated.
1	1	Aircraft landing in Steens Mountains Recreation lands is nonsensical.
1	1	Oregon Trail-Keeney Pass: Plan is contradictory on width of trail.
1	1	OHV use in Keeney Pass area should be stopped.
1	1	Many range improvements in this area probably preclude it from qualifying as a SMA.
1	1	Remove the Alvord Hot Spring from the Steens Mountain Recreation lands to help eliminate confusion between public and private lands.
1	1	Bureau of Reclamation wants permission to develop a parking lot up Cherry Creek.
1	1	Removing grazing from Deary Pasture removes water source from Jackies Butte Allotment; another water source is needed.

I	S	OPINION/COMMENT
1	1	Map LVST-1J: Rome North is listed as a livestock exclusion area; it is needed for Jackie Butte permittee.
1	1	Rewrite plan to accommodate the livestock users in Deary Pasture and Rome North.
1	1	Jackie Butte permittees want to see range development provisions in the plan for their allotment.
		<i>Reasons:</i>
		(1) plan needs to allow fence building to meet objectives
1	1	Jackie Butte permittees has a problem with eliminating grazing in Deary pasture; believes that it is not in accordance with WSR plan.
1	1	Map LVST-1J: error; Cattle are on west side of Cow Creek below Cow Lakes; remove Skinner Ranches private lands from shaded area on map.
1	1	Appendix E: Antelope Allotment #21002: season us use should be 4/01 to 12/31.

SEQUENCE NUMBERS (Numbers in bold are much more detailed information): 001, 002, 003, 006, **020, 021**, 033, 034, 044, 063, 064, 065, 066, 067, 071, **075**, 079, 080, 081, 082, 083, 084, 085, 086, 089, 092, 097, 102, 106, **107, 109**, 112, 113, 114, 116, 119, 121, 124, 165, **166**, 167, 205, 217, **232**, 256, **257**, 260, 261, 264

## OTHER COMMENTS

*Respondents commented on a variety of issues including the inadequacy of the plan in addressing soils, microbiotic crusts, noxious weeds, and a transportation plan. Comments also expressed that urban public land users did not have adequate notice and time for input to lands that are important to them.*

- |   |   |   |
|---|---|---|
| 2 | 2 | Not enough time to review and comment.  |
| 2 | 2 | Not enough meetings in westside urban centers.  |
| 2 | 2 | Not enough representation of tourists who live outside the planning area.                                 |
| 2 | 2 | Plan pays inadequate attention to weeds.  |
| 1 | 6 | The plan fails to reveal the extent of degradation of soils in the planning area.                         |
| 1 | 6 | The plan must show how far current soil conditions deviate from potential natural condition.              |
| 1 | 6 | The plan must provide monitoring data to support the contention that soils are improving.                 |
| 1 | 6 | Plan basically ignores microbiotic crusts; should address importance, status, and causes for degradation. |
| 1 | 6 | The costs and benefits of the different alternatives have not been analyzed.                              |
| 1 | 6 | The number of jobs created by different uses of the land must be presented.                               |
| 1 | 2 | The goal of the plan is to eliminate access to nongovernment persons.                                     |
| 1 | 1 | We suggest a clear definition of "ecosystem management" be included in the document.                      |

I	S	OPINION/COMMENT
1	1	The document should clarify how BLM will incorporate local citizens and government into ecosystem management.
1	1	The plan should give further attention to increased roads and costs.
1	1	Page 377 (para 4): All livestock watering troughs should have wildlife safety ramps.
1	1	BLM has failed to adequately address military overflights in the plan on natural and human environment.
1	1	BMPs: Surface disturbance activities #1-3 should be eliminated.
1	1	BMPs: Forest management #1 should be eliminated.
1	1	Fire suppression: #2 modified to permit use of nonnatives.
1	1	APHIS program should continue for predator control.
1	1	Close south portion of Steens Loop Road.
1	1	Close and reclaim other roads where they serve no function.
1	1	Grazing should not occur in areas that are still relatively weed free.
1	1	Promotes public education and outreach regarding the plan.
1	1	Federal government has no constitutional right to own or manage land.
1	1	Rehabilitate user-created roads incompatible with ecosystem management goals.
1	1	Complete a transportation plan before regional plan.
		<i>Reasons:</i>
		(1) transportation plan must be made public for comment
1	1	Better scoping and outreach would lead to a more accurate analysis of stakeholders (including the final plan).
<b>SEQUENCE NUMBERS: 005, 075, 110, 166, 174, 176, 180, 202, 217, 232, 238, 240, 266</b>		