

1251

RECEIVED

JAN 14 2004

BLM PRINEVILLE DISTRICT

Bureau of Land Management
ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

RE: Upper Deschutes Resource Management Draft

As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon.

The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed.

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Print Name DEAN DIMICK

Address 62785 HAMBY BEACH OR

Signed 

1252

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ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

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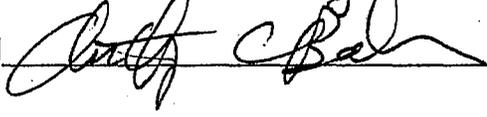
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Print Name Anthony C Bohren

Address 60189 Cheyenne Rd - Bend, OR 97702

Signed 

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3050 NE 3rd St
Prineville, Oregon 97754

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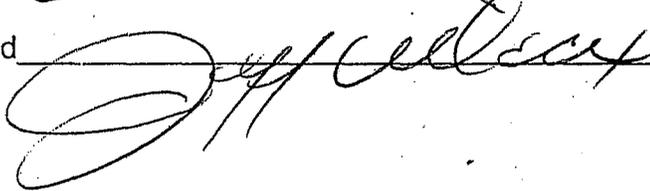
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Print Name Jeff Wilcox

Address 61523 American rd Bend, OR

Signed 

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ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

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Print Name Taran McLagan age: 10

Address 20602 Coventry Circle

Signed Taran McLagan age: 10

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ATT: Teal Purrington
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Print Name DAN LASPERIO

Address 61127 CHUCKAWAT Bend or 97702

Signed [Signature]

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1256

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ATT: Teal Purrington
3050 NE 3rd St
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Print Name

John McLagan

Address

2000 Coventry Circle ~~97702~~ 97702

Signed

John McLagan age 14

Bureau of Land Management
ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

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Print Name

Megan MacDonald

Address

PO Box 7785 Bend OR 97708

Signed

Megan MacDonald

Bureau of Land Management
ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

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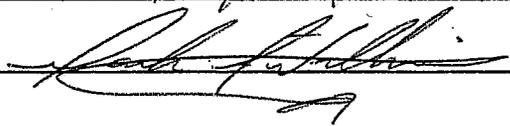
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Print Name MARK WILLIAMS

Address 5288 N MADRAS HWY PRINEVILLE OR 97754

Signed 

Bureau of Land Management
ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

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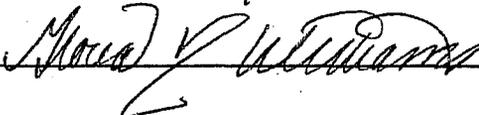
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Print Name Gloria D. Williams

Address 61031 Fox Hills Drive Bend, OR 97702

Signed 

Bureau of Land Management
ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

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Print Name Casey Williams

Address 61031 Fox Hills Drive Bend Oregon 97702

Signed Casey Williams

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Print Name Walt Williams

Address P.O. Box 6467 Bend, OR 97708

Signed [Signature]

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ATT: Teal Purrington
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Prineville, Oregon 97754

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Print Name

Darrell Goodman

Address

2490 NW Lamonta Prineville, OR.

Signed

Darrell Goodman

Bureau of Land Management
ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

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Print Name Dale A. McCallister

Address 2533 N.E. Quail Valley Ln Prineville, Ore

Signed Dale A. McCallister

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ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

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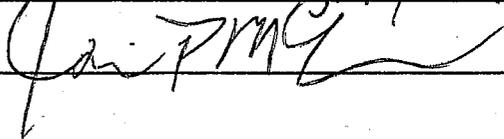
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Print Name James P McGuire

Address 4070 NW Happy Hollow Dr Prineville 97754

Signed 

#1265

Bureau of Land Management
ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

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Print Name Dawn Way

Address 1113 NE Lockout Prineville, OR.

Signed Dawn M. Way

#1266



nomadicwing@comcast.net ()

01/13/2004 08:03 PM

To: shaylor@realestatechampions.com, upper_deschutes_rmp@or.blm.gov
cc:
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by (nomadicwing@comcast.net) on Tuesday, January 13, 2004 at 23:03:12

name: Gary S. Anderson

address: 4697 2nd Way SE - Salem, OR. 97302

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1267

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ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

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Print Name Susan C. Lever

Address 20954 King David, Bend OR 97702

Signed Susan C. Lever

JANUARY 12, 2004

#1268
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BUREAU OF LAND MANAGEMENT
3050 NE THIRD STREET
PRINEVILLE, OR 97754

JAN 13 2004

BLM PRINEVILLE
DISTRICT

ATTENTION: TEAL PURRINGTON

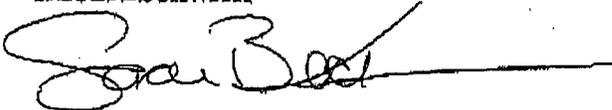
WE ARE CONTACTING YOU IN REGARDS TO THE PROPOSED GRAVEL PIT ON BARR ROAD. WE WOULD LIKE TO LET YOU KNOW WE VEHEMENTLY OPPOSE THIS SITE FOR THE PIT. ONE OF THE MANY REASONS IS THE ENVIRONMENTAL IMPACT ON THE LAND AROUND THE SITE; ON THE ANIMALS AS WELL AS HUMAN. THE PROXIMITY TO RESIDENTIAL AREAS IS FRIGHTENING, AS WE HAVE NUMEROUS ANIMALS, AND WE ARE HAVING OUR FIRST CHILD SOON. THE SHEER AMOUNT OF TRAFFIC WOULD BE VERY DANGEROUS. BARR ROAD IS HEAVILY USED BY HORSE BACK RIDERS, RECREATIONAL ENTHUSIAST, AS WELL, MANY PEOPLE WALK/ JOG EITHER WITH OR WITH OUT THEIR CHILDREN; SURELY YOU CAN SEE HOW DANGEROUS A HEAVILY TRAVELED ROAD WITH GIANT TRUCKS WOULD BE. WE MOVED HERE RECENTLY, AND DID SO BECAUSE OF PRIVACY, THAT WOULD BE DESTROYED AS WELL OUR PROPERTY VALUES WOULD PLUMMET.

THE OTHER SITE PROPOSED ON 126 IS A MUCH BETTER OPTION. IT WOULD NOT IMPACT A RESIDENTIAL AREA. ALSO, PROPOSING TO RUN THE TRUCKS ON BARR ROAD EVEN IF THE SITE IS ON 126, IS A VERY BAD IDEA FOR THE AFOREMENTIONED REASONS. I HAVE ALSO BEEN INFORMED THAT A STUDY WAS DONE ON THE NECESSITY OF ANOTHER GRAVEL PIT AND THAT THE FINDINGS WERE SUCH THAT THERE IS TEN TIMES ENOUGH GRAVEL FOR THE NEXT FIFTY YEARS AT THE CURRENT SITES.

PLEASE KNOW THAT THIS PIT WOULD NEGATIVELY IMPACT THE LIFE OF ALL BARR ROAD RESIDENTS, AS WELL GERKING MARKET ROAD. OUR PROPERTY VALUES WOULD DROP, AND THE TOXICITY OF THE TRUCKS AND THE PRODUCTION OF THE AGGREGATE WOULD GREATLY HARM HUMANS AND ANIMALS ALIKE. WE DO NOT WANT OUR QUALITY OF LIFE DESTROYED TO PLACATE ODOT. WE DON'T SEE THIS SITE AS A LOGICAL ONE SEEING AS THERE IS ANOTHER OPTION. THANK YOU FOR TAKING THE TIME TO LISTEN TO OUR REASONS AS WHY NOT TO PUT THE PROPOSED SITE ON BARR ROAD.

THANK YOU-

SARAH BECKWITH



TODD BECKWITH



HAND

#1270

Bureau of Land Management
ATT: Teal Purrington
3050 NE 3rd St
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Print Name Edward C. Faulkner

Address 1750 S.E. Myrtlewood Ln. Prine, 97751

Signed Edward C. Faulkner 1-14-04

#1241



leveaux@bendcable .co
m ()
01/13/2004 05:51 PM

To: shaylor@realestatechampions.com, upper_deschutes_rmp@or.blm.gov
cc:
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(leveaux@bendcable.com) on Tuesday, January 13, 2004 at 20:51:34

name: Bill LeVeaux

address: 60833 Defiance, Bend, Or

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents.

Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually - the increasing use is not reflected in the severe limitations to OHV use on BLM land.

Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

textarea: The real problems will not stop because this area is closed. The garbage will still collect and the outlaws will still damage. The best way to control damage is by having decent folks around to discourage this problem(s). Closing areas only treats us like children. We need access so that outlaws cannot hide from the public eye.

Submit: Submit

#1272



ctdredmond@aol.com ()

01/14/2004 06:50 PM

To: shaylor@realestatechampions.com, upper_deschutes_rmp@or.blm.gov
cc:
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(ctdredmond@aol.com) on Wednesday, January 14, 2004 at 21:50:56

name: cindy chamberlin

address: 2460 nw 101st street, redmond, or 97756

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents.

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Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Submit: Submit

#1273



"wetzels"
<jmwetzel@bendnet.co
m>

01/14/2004 09:17 PM

To: "Bureau Land Management" <upper.deschutes.RMP@or.blm.gov>
cc:
Subject: Comment on Upper Deschutes Management Plan

From Jules Wetzel
64820 McGrath Rd., Bend 97701

I have had access to the executive summary and attached maps. I understand you plan to impose alternative 7, so I will comment on the information I gathered from the maps of alt. 7. I am a landowner adjacent to BLM property - Between Redmond and Bend, East of US 97.

1) regarding the habitat restoration proposal map. There is no such thing as "Old Growth Juniper Habitat". How about restoring the open sagebrush/grassland habitat that apparently existed prior to universal fire suppression? It should be much more beneficial to native wildlife.

2) Alternative 7 Travel Management. Open to *Designated* Roads and Trails Year Round. Emphasis mine. No real problem with such designation. The problem is the historical total lack of enforcement. I use the Public lands almost daily, and watch what happens locally. I have never seen an official vehicle of any kind locally (near my property) during my time on public lands. No enforcement means ORV and ATV users create whatever trails they feel like, despite signs posted at public land access points. ORV and ATV users, in my experience, have no regard for pedestrian or horse users, and primarily destroy whatever they ride over. Most of the ones I meet on roads and trails are aggressive speeders, backing down only when they meet a rig bigger than what they are driving. I believe they need a separate area to destroy, and stick to it.

If the BLM cannot afford to have federal law enforcement, they should consider contracting with local law enforcement to periodically enforce your plan. A few random enforcement actions should do wonders for respect of the law.

3) Land Tenure. Straight opinion. Federal agencies have no need to either acquire or dispose of property except for minor land-locked parcels. Throw this portion out entirely.

4) Public Safety. I support closing the area in T17S, R12 & 13E - near the City of Bend Sewer Treatment Plant. I have seen target shooters shooting toward the plant totally ignoring its presence less than 100 - 150 yards away.

However - to create a de facto wilderness area (badlands) and then close it to firearms except during designated hunting seasons ignores the coyote and other predator hunting that goes on year-round and makes no sense to me.

Thank you for this opportunity.

Jules R. Wetzel

#1274



tm30099@yahoo.com ()

To: shaylor@realestatechampions.com, upper_deschutes_rmp@or.blm.gov

01/14/2004 11:19 PM

cc:
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(tm30099@yahoo.com) on Thursday, January 15, 2004 at 02:19:48

name: Jay Tyson

address: 20847 NW Pumpkin Ridge Road

comment: As a concerned citizen and recreationist I would like to be on record
as supportive of motorized recreation on BLM lands in Central Oregon.

The preferred alternative BLM is proposing does not adequately reflect how an
interim policy will be implemented. This interim policy greatly affects our
sport and the users as there are no assurances BLM will ever have the
resources to put together a designated trail system in the areas proposed. The
aggressive vegetation management in Alt. 7 of the Juniper woodlands will
negatively impact a proposed trail system.

We do not support the closure of the Badlands and feel that providing no
motorized opportunities at Prineville Reservoir and the Lapine area is a
mistake. There is use occurring in those areas currently, where will that use
go? Especially for the Lapine and Prineville residents.

Our use is increasing approximately 20% annually with sales of OHV equipment
listed at \$18 billion annually - the increasing use is not reflected in the
severe limitations to OHV use on BLM land.

Please adopt a more flexible road trail density to allow for the best use of
the land and for a designated trail system that will succeed. By
micromanaging your areas and attempting to designate different trails for
several different uses in the same areas we feel the management will fail and
ultimately our use will suffer further restrictions.

textarea: I have two teenage boys! Without OHVs to keep kids involved in
something they can do and love with there Dad..... If it wasn't for dirtbikes
and a place to ride the folks I'd be dealing with would be our law inforcment,
and drug rehab! Bikes have saved these boys lives!!!!!!!!!!!!!!

Submit: Submit

#1275



"Stephanie Phillips "
<phillipsgraphics@hotmail.com>

01/15/2004 12:18 AM

To: upper_deschutes_RMP@or.blm.gov
cc:
Subject: BLM Comment Letter

CENTRAL OREGON MOTORCYCLE AND ATV CLUB

To Whom it May Concern;

As Media Coordinator boardmember for the Comac Club, I have read Joani Duford's letter and that upon review of the position that our Land Use Director has taken and stated regarding the Upper Deschutes Resource Management Draft, that the club and the board is supportive and wants to see additional OHV opportunities provided which the BLM preferred alternative does not address.

I feel as a motorized recreator here in Central Oregon, that we should be treated as fairly as those others who like to use the land as much as we do. As a Club Member, I know we follow and teach others to follow the motorized recreation rules and help others to continue to tread lightly so we able to keep up with the hobbie we love to do so much.

I give my Land Use Director, and as well as my club, My 100% full support, against the BLM preferred alternative!

Thank You for your time and consideration,

Stephanie Phillips
Comac Media Coordinator and Club member

There are now three new levels of MSN Hotmail Extra Storage! Learn more.
<http://join.msn.com/?pgmarket=en-us&page=hotmail/es2&ST=1>

#1276



jcar001@cnonline.net ()
01/14/2004 03:34 PM

To: shaylor@realestatechampions.com, upper_deschutes_rmp@or.blm.gov
cc:
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(jcar001@cnonline.net) on Wednesday, January 14, 2004 at 18:34:39

name: Jonathan Carlson

address: 25491 S Larkin Rd Beaver Creek, OR 97004

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Submit: Submit

#1277



white6182@aol.com ()
01/14/2004 03:53 PM

To: shaylor@realestatechampions.com, upper_deschutes_rmp@or.blm.gov
cc:
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(white6182@aol.com) on Wednesday, January 14, 2004 at 18:53:06

name: David White

address: 2010 SW Cerise Way Troutdale OR 97060

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1278



LtDan310@direcway.com
m 0
01/14/2004 01:37 PM

To: shaylor@realestatechampions.com, upper_deschutes_rmp@or.blm.gov
cc:
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(LtDan310@direcway.com) on Wednesday, January 14, 2004 at 16:37:40

name: Dan Burkett

address: 45305 SE Marmot Rd. Sandy Or 97055

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents.

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Please adopt a more flexible road trail density to allow for the best use of the land ~~and for a~~ designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Submit: Submit

JAMS

#1279

RECEIVED

Ferminia Perez
2813 NE Sycamore Ct.
Bend, OR 97701

JAN 15 2004

BLM PRINEVILLE
DISTRICT

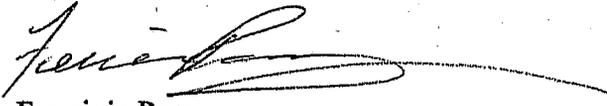
To Whom It May Concern:

I am writing to comment on the Upper Deschutes Plan. I think that the BLM is doing a good job protecting the Badlands with the preferred alternative. This area is really beautiful and unique and should be protected from vandals and OHV users. This is a great area to go and look at geologic formations and to walk. I think that for people with Multiple Chemical Sensitivity Disorders removing exhaust and other fumes from this beautiful area is really important. It would be even better if people couldn't even use perfume, mosquito sprays, or other chemicals there, but I know you can't regulate all of that.

I would like to say, though, that as someone who has a friend in a wheelchair, that I would like to see more areas designated with disabled access – such as paved trails, paved parking lots, and some paved viewpoints, etc. Since you are going to be doing a lot of work in this area over the next few years, it would be really great to focus some attention on this issue. To often people who are disabled are forced to just go to the big parks where they can roll down their window and feed a squirrel – they need to be able to get out into the wilderness too.

I would also like to support the North Unit Irrigation Canal trail system because it would be a developed trail that a lot of people could use. With obesity in this country skyrocketing, easily accessible trails that everyone feels comfortable using makes a big difference.

Thank you for listening to my comments!



Ferminia Perez

1/15/04

#1200



"Joanne and Larry "
<landjulrich@bendcable
.com>

To: <upper_deschutes_RMP@OR.blm.gov>
cc: <brjoani@aol.com>
Subject: upper deschutes

01/13/2004 01:05 PM

Dear sirs; I am in agreement with alternative #7 with the following exceptions. #1. It seems that the reason for this study is the problem of exploding population in central Oregon. So you need more recreation opportunities, not less. We need more OHV trails, not less. Opening North Millican in the winter is a start, but don't cut trail mileage. #2. Juniper trees. I hate them and would prefer that most were gone. When they are thinned out, the grasses will come back. If you look at pictures taken in the early 1900s there were very few juniper trees. I would like to see anything larger than 18" in diameter left standing. Also, leave corridors next to roads and trails and in any area that have trails planned there. #3. At Cline Buttes, leave the area East of the Cline Falls highway open. I have been riding motorcycles in the Cline Buttes area since the early sixties and most of the trails there are 20 to 40 years old. Of course we make extensive use of the old Tumalo canals that never saw a drop of water. These canals are over 100 years old and we had not been riding them for all these years, they probably would have disappeared by now and BLM would have forgotten about them. If the BLM wanted to preserve some of the history, they should have started about 50 years and saved the valve house atop the Tumalo dam. The Cline Buttes area has been a designated riding area for several years, but the BLM has done nothing to manage it. When the BLM gets around to making a trail system, only a minimum of work should go into it. It should be mapped with trail numbers, private property boundaries marked and trails leading to them should be closed. Leave the trails "single track", because as soon as you use cats and groomers on them they become extremely fast and dangerous.

#4. Millican Plateau. Due to its low elevation, it is the only place in central Oregon in the winter and draws riders from all over the Northwest. The area needs to be expanded like is shown in alternative #2 in the N.E. area along the rimrocks of the Crooked River. There are existing trails there now that have fantastic view points. Also due to the hundreds of riders using this area every weekend, we need more trails within the Millican Plateau. Tourism is the number 1 source of money in central Oregon. Each one of these riders from Portland, Vancouver, Eugene, etc. spend money for food, gas, and lodging each trip. This represents a significant amount of money flowing into our economy.

#5. Last, but not least "The Badlands WSA". The Badlands should go back to multiple use and be withdrawn from Wilderness consideration. From the start this place is wrong for Wilderness. Solitude? You can hear trucks on highway 20 anywhere within the boundary. Now there will be a new highway on the Eastern boundary. Untrammeled by man? Hah. Stumps everywhere from years of legal wood cutting for fence posts, firewood, housing materials for the homesteaders. There is a currently operating open pit mine, a World War II bombing range. This is not my idea of a Wilderness area. Go look at Jefferson or the Three Sisters Wilderness. That's what a Wilderness is supposed to look like. Also, the BLM supervisor at the time broke the rules from the beginning, WSA guidelines said all existing roads and trails were to remain open. He closed half of the roads and all of the trails. The first time I saw the pictographs in Dry Canyon was in the sixties and they were vandalized then. I hate to see any kind of vandalism, but more aggressive law enforcement is what we need, not closures.

Thanks for letting me express my ideas and I hope you made it to the end of this lengthy letter.

Larry Ulrich
P.O. Box 491
Bend OR 97709
541-382-3837

January 14, 2004
#1281

RECEIVED

JAN 15 2004

BLM PRINEVILLE
DISTRICT

Kaia Seiffert
2813 NE Sycamore Ct.
Bend, OR 97701

To Whom It May Concern:

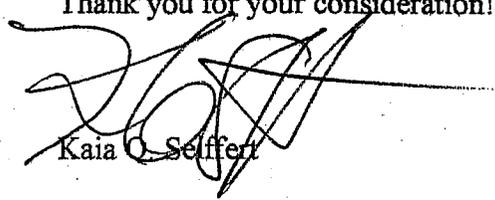
I am writing to comment on portions of the Upper Deschutes Plan. I appreciate the effort your office has gone through to put this together. I like the separation of uses in some areas. I know you're supposed to manage for multiple uses, but I'm glad you know that doesn't always have to mean all of those uses in one area.

To that end, I am in support of making some areas closed to motorized vehicle use in order to provide areas for people who enjoy walking and hiking without OHV noise. I won't use areas like Millican when it's open for OHV use to hike, so it only seems fair to provide some areas that I can use. In particular, I am in favor of the motorized closures in the Badlands, the non-motorized trails around Cline Buttes, the closures south of Alfalfa Market road, and the portions of Horse Ridge. This provides me, a Bend resident, with a variety of opportunities near my home.

I would also like to voice my support for the development of the North Unit Irrigation Canal trail system. This would provide a unique way to travel between Bend and Redmond and possibly up to Smith Rocks where I recreate. The flat terrain would make that a good place to bring less athletic visitors to ride and still see a bit of the countryside.

Finally, while I know people need to go places to practice shooting, I am completely in favor of the closures proposed by Alternative 7 - I think shooting should be taken as far away as possible from urban areas and designated trail areas. Perhaps putting some of the shooting areas in the designated OHV areas would slow all of that projected use increase!

Thank you for your consideration!



Kaia Seiffert

FAX

#1282
RECEIVED

Prineville BLM
Attn: Teal Purrington & G. Scott Currie

JAN 14 2004

BLM PRINEVILLE
DISTRICT

After reading through piles of paper on your management draft I feel it would take several pages to address your issues. So I will try to respond on a short form to save you and me time.

The Upper Deschutes Resource Management Draft and none of the alternatives are satisfactory in my opinion.

The reasons as follows.

1. OHV use does not harm wildlife at all. Most wildlife will watch OHV's pass by, but will run from a person walking.
2. If man-made canals are historical then so is person riding an OHV.
3. Old growth juniper are not harmed from OHV use, if anything they will harm an OHV rider.
If the BLM authorizes the cutting down of acres of Juniper trees around the Central Oregon area, then how do OHV riders have an adverse effect?
4. OHV users are not the people causing fence cutting, garbage dumping, partying illegal hunting and leaving target shooting messes.
5. The BLM has been closing OHV areas and not opening up bigger, new areas to accommodate the rising amount of OHV users. You should open more areas to lessen the impact on existing areas. Closing any area, without opening new ones, just causes heavier usage on the remaining ones.
6. A lot of OHV users take their personal time to clean up the mess that other users make. I have not seen any hikers on clean-up detail or paying fees to use trails.
7. All OHV owners (whether they use trails or not) pay a yearly fee thru their ATV stickers.

Thank you for your time and consideration.

Bob Chamberlin
2460 NW 101st Street
Redmond, OR 97756

541-923-3194

#1283

JAN 15 2004

Comment Form

For public input on the Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement JAN 15 2004

RECEIVED

Today's Date: 1/15/04

JAN 15 2004

Your name (please print): _____

Representing (put an X in one box only): _____ BLM PRINEVILLE DISTRICT

self only, or
 business, organization, or agency (list): _____

Street Address, State, and ZIP: _____ 97754

Phone: _____ E-mail: _____

Important Privacy Notice: All written comments, including names and street addresses, will be available for public review upon request, and may be published by the BLM during the planning process. However, as an individual you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: .

Comments:

In WSAs, ACECs, RNAs and areas already heavily visited by the general public, commercial use should be limited to no more than one trip per day. Commercial party size should be limited to 12 persons in WSAs, in fact all parties commercial or private should be limited to 12 persons in WSAs to reduce impacts. Leave No Trace, Inc. has found, through extensive research, that the larger the party size, the ~~the~~ greater the impact. Contact LNT for details.

Continue your comments on the back of this page, or on additional pages

#1284 / 1/15/04

Handwritten signature/initials

Comment Form

For public input on the Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement

RECEIVED

JAN 15 2004

BLM PRINEVILLE DISTRICT

Today's Date: 1/15/04

Your name (please print): Heaven T Mott

Representing (put an X in one box only):

self only, or

business, organization, or agency (list): _____

Street Address, State, and ZIP: PO Box 1067 Prineville

Phone: 541-416-1506

E-mail: HTMott@aol.com

Important Privacy Notice: All written comments, including names and street addresses, will be available for public review upon request, and may be published by the BLM during the planning process. However, as an individual you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: .

Comments:

All areas within 10 miles of the volcano growth boundaries or city/town limits should be closed to camping (overnight occupancy) unless within a designated camping area.

This will reduce illegal occupancy, trash dumping, human waste contamination, law enforcement patrol needs.

#1285



"Matt Skeels"
<toanimate@bendcable.com>
01/15/2004 02:24 PM

To <Upper_Deschutes_RMP@or.blm.gov>
cc
bcc
Subject Badlands

Hello!!

I would write much more but time is limited. Please make an effort to close the Badlands to OHV usage! This is such a beautiful place, and we cannot just let it be neglected to recreational use that destroys and defaces the natural beauty that is the badlands!

thanks!

Matt Skeels
19799 Galileo
Bend, OR 97702

#1286



"Craig Ratzat"
<neolithics@earthling.net>
01/15/2004 11:21 AM

To Upper_Deschutes_RMP@or.blm.gov
cc
bcc
Subject comments

1-15-04
Craig Ratzat
86430 Bailey Hill Rd
Eugene, Or 97405
541 338 3043

I would like to comment on the rockhounding changes. My main interest is not in this portion of your district but in the eastern part. But since you are working here first you will most likely be using this as a example for the other half.

First- Volume3 Page 61

What are you defining as a stream channel? I'm sure that you have many different terms to define different types. Flowing, seasonal, dry, ect. A stream channel in this case could be a wash that only see's flowing water once every so many years from flash rains. Is every ravine on the side of a hill a stream channel. Please define.

Next-

You want to reduce personal overuse or commercial use, and try to do so by making tighter restrictions on what is personal use. You say all commercial use will need a permit. But because you do not provide any terms for commercial use for a weekend rockhound that would only work with hand tools, you eliminate why many are rockhounds and that is to make an extra dollar. If you don't spell out the terms of how to get and for how much is allowed and everything else then if I were to go and ask for a commercial permit, no one there knows what to do so the answer is usually no.

I would like to see rockhound areas that keep out the big backhoes and equipment but let people buy a permit to hand dig only. Have a permit that you need to buy a minimum amount, but there is also a maxium amount. If you want to control the number of permits make it not an over the counter application with a date cut off.

This does not have to be for all areas, but by not providing some you leave a large number of rockhounds out. People that have permits are thier own police and teachers to educate would be misusers.

Thank You
Craig Ratzat
--

Get your free email from <http://www.iname.com>



"Don Horton"
<Don@bendparksandrec.org>

To upper.deschutes.RMP@or.blm.gov

cc Bruce@bendparksandrec.org

01/15/2004 09:00 AM

bcc

Subject Comment on Upper Deschutes Resource Management Plan

TO: MR. ROBERT TOWNE

FROM: DON HORTON, EXECUTIVE DIRECTOR
BEND MERTO PARK AND RECREATION DISTRICT

DATE: JANUARY 15, 2004

SUBJECT: COMMENT ON UPPER DESCHUTES RESOURCE MANAGEMENT PLAN

FIRST

At the January 6 meeting of the Bend Metro Park and Recreation District board meeting, the boards of directors' voted 4-0 to request the BLM add Tillicum Ranch to the exchange list. Tillicum Ranch is owned by the BMPRD and is located immediately adjacent to the BLM Tumalo unit off Couch Market Road.

Tumalo Ranch is approximately 200 acres in size and holds tremendous value in increasing the ability to manage the wildlife resources in the Tumalo Unit area. BMPRD owns over 100 acres of water rights, and a pond on the ranch.

SECOND

The land owned by the Oregon Department of Transportation off Hwy. 20 should be considered as a parking area for users of the recreation resources of Tumalo and Cline Butte Units. The opportunity to park along a major highway will better serve Central Oregon residents. Additionally if private parcels between the Tumalo and Cline Buttes Units were acquires an uninterrupted recreational resource could be attained.

THIRD

BMPRD is interested in connecting the city of Redmond with the city of Bend with a trail extending from the Pine Nursery area through BLM property to Redmond. We do nothave a route identified for this trail, however, the need for such a trail and the potential development of a trail should be included in the plan.

I will be glad to sit down with you to discuss and clarify further these requests. I can be reached at 541-389-7275.

#1288



"Mike O"
<mikey05@starband.net>
01/15/2004 11:40 PM

To <upper_deschutes_rmp@or.blm.gov>
cc
bcc
Subject Upper Deschutes Resource Management Plan

Dear Sirs

I am glad you have a management plan in the upper Deschutes area. I like what I see. I saw your presentation in Lapine and was very impressed with your professional presentation. I live Directly adjacent BLM land on Whittier street just off Lapine State Rec Road. The land behind me is in a land trade with young's ranch and will soon be open to the public Which is ok with me but We do have a problem. As an example we have a lot of off road vehicles.trucks and motorcycles in use day and night. there is also Shooting on that Blm land and believe it will increase once the land is more open whitch I believe is a big hazard for people in this area walking on the trails . Most people are afraid to walk on the blm land right now because of the shooting . There is also a elk and deer migration through this area and I am worried that this will drive them to another area or possibly destroy the heard. Also im am very worried about the environmental impact of off-road vehicles not to mention the disturbing the peace in the residential neighborhood. As you can see we are in favor of any plan that does not allow off road use or firearms in the area. I believe there are plenty of other places that are away from homes too ride and shoot with minimal impact on homeowners.

Mike OGrady
PO Box 4883
Sunriver OR 97707

#1289



jesblu00@msn.com ()
01/15/2004 03:35 PM

To shaylor@realestatechampions.com,
upper_deschutes_rmp@or.blm.gov

cc

bcc

Subject COMAC and BLM

Below is the result of your feedback form. It was submitted by
(jesblu00@msn.com) on Thursday, January 15, 2004 at 18:35:47

name: jessica blume

address: 1432 w broadway, eugene, oregon, 97402

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents.

Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually - the increasing use is not reflected in the severe limitations to OHV use on BLM land.

Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Submit: Submit

#1290



dunejumper1@msn.com ()
01/15/2004 03:36 PM

To shaylor@realestatechampions.com,
upper_deschutes_rmp@or.blm.gov
cc
bcc
Subject COMAC and BLM

Below is the result of your feedback form. It was submitted by
(dunejumper1@msn.com) on Thursday, January 15, 2004 at 18:36:22

name: david rasmussen

address: 1432 w broadway, eugene, oregon, 97402

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents.

Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually - the increasing use is not reflected in the severe limitations to OHV use on BLM land.

Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Submit: Submit

#1291



jessica@lanepds.org ()
01/15/2004 03:36 PM

To shaylor@realestatechampions.com,
upper_deschutes_rmp@or.blm.gov
cc
bcc
Subject COMAC and BLM

Below is the result of your feedback form. It was submitted by
(jessica@lanepds.org) on Thursday, January 15, 2004 at 18:36:59

name: betsy blume

address: 4881 donald street, eugene, oregon 97405

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system. We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents. Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually - the increasing use is not reflected in the severe limitations to OHV use on BLM land. Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Submit: Submit



"The Variels"
<variel@bendnet .com>
01/15/2004 12:00 PM

To <Upper_Deschutes_RMP@or.blm.gov>
cc
bcc
Subject Fw: UPPER DESCHUTES RESOURCE MANAGEMENT PLAN

----- Original Message -----

From: The Variels
To: upper_deschutes_RMP @or.blm.gov
Sent: Thursday, January 15, 2004 11:32 AM
Subject: UPPER DESCHUTES RESOURCE MANAGEMENT PLAN

Dear B.L.M.

I appreciate the opportunity to read and respond to the Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement. It is a very thoughtful and comprehensive document.

It is my opinion that alternative 7 is our best choice. However, I have some concerns with the language, or lack of in some cases, pertaining to some critical issues. In specific, the areas of firearm and motorized vehicle use and grazing policies in the winter deer range do not appear to be addressed adequately.

I have witnessed numerous target shooting events, motorcycle and a.t.v "runs" and illegal campfires in the Tumalo Winter Deer Range. They seem to occur on the weekend when law enforcement is not available to investigate. Roads in the protected areas need to be closed and signs stating consequences for illegal use should be posted. Would it be possible to hire a "cadet" or law enforcement person "in training" to fill this vital need ?

All use of firearms in this habitat are detrimental to the health and safety of animals and should be confined to urban / industrial sites. Primary protection for animals should be the first directive.

Regarding the grazing rights in this area, major concerns arise dealing with soil infiltration, financial fencing responsibilities and the removal of critical

habitat forage and protection. Noxious weeds are a huge problem as a result of grazing in incompatible areas.

Again, I urge you to adopt Alternative 7 after adding some more definitive language to help protect this special habitat.

Respectfully,
Jeff Variel
18003 Couch Market Road
Tumalo

#1293



Connie Jones
<CJones@oms.edu>
01/15/2004 11:43 AM

To <upper_deschutes_RMP@or.blm.gov>
cc
bcc
Subject Attn: Teal Parrington

Comments on Upper Deschutes Resource Management Plan and Environmental Impact Statement

Thanks

Connie

Connie Hofferber Jones
OMSI Science Camps Assistant Director
7171 SW Quarry Ave.
Redmond, OR 97756
541.548.5473
FAX: 541.504.8365
CJones@oms.edu
www.oms.edu



BLM Comments.doc

#1293

QuickTime™ and a
TIFF (Uncompressed) decompressor
are needed to see this picture.

January 14, 2004

Bureau of Land Management
Attention: Teal Purrington
3050 NE Third Street
Prineville, OR 97754

RE: Comments on the Upper Deschutes Resource Management Plan Draft

We at OMSI Science Camps are concerned about the implied restriction on Special Use permittees' use of off-trail areas on BLM lands in the Deschutes Resource Management Area. OMSI has been leading science education programs onto public lands for years under a Special Recreation Permit with the BLM. Under all the proposed alternatives of the Upper Deschutes Resource Management Plan draft, there seems to be an implicit suggestion that hiking programs would be restricted exclusively to established roads and trails and that all areas will be closed to cross-country foot travel. We believe that OMSI's programs insure a low-impact way to investigate a wide variety of destinations on public land. Part of each program is educating new users about the fragile high desert ecosystem and how to practice Leave No Trace principles.

Restricting OMSI science instructors and students to established roads and trails (most of which are designated for motorized vehicles) is incompatible with the non-disruptive, educational activities that OMSI staff and students have been conducting on BLM lands in Central Oregon since 1951. Drafting geographic cross sections and maps, doing vegetative wildlife transects, doing range investigations, and conducting species surveys involves cross-country surveying of the plant and animal communities and geology of an area. Restricting OMSI groups to roads and trails would dramatically impact the viability and productivity of these educational programs.

This document admits that there is no extensive established trail system in place. This UDRMP does not even give an accounting of the miles of currently established non-motorized trails in the study area. The document only notes that:

“Trail hiking opportunities on BLM administered lands in the planning area are limited by the lack of identifiable, designated and signed trails. Only a few developed and maintained hiking trails exist on BML administered lands in the planning area...” (pg 307, Chap. 3, vol. 2).

Consequently:

“Over the short-term, all annual special recreation permits for trail use would not be renewed until such use was authorized on designated trails that are part of BLM’s transportation system.... However, this would also provide an impetus for trail designation in areas that currently do not have any identifiable trail systems.” (pg. 479, Chap. 4, Vol. 2)

While all action alternatives call “for an increase in non-motorized trail development,” it is unlikely that there will be a rapid development of an extensive non-motorized trail system for many years.

Other uses on these BLM lands will be granted much greater access under all proposed alternatives:

- 374,365 acres are open under all alternatives to mineral leasing. Table ES-3 (Pg. xxxix, Vol. 1) and Table 4-17
- 331,677 (or greater) acres are available for rockhounding, Table 4-18
- 228,685 (or greater) acres are available for livestock grazing. Table ES-3 (pg. xxxviii, Vol. 1)
- 153,081 (or more) acres are available year-round for motorized vehicle use for recreation (multiple use with shared facilities), Table ES-3 (pg. xxxix, Vol. 1) and Table 4-22
- Nearly 97% of all the land in the management area is open for hunting (hunters are presumably not restricted to designated roads and trails.) Table 2-1 (pg. 213)

Yet, at most, 87,832 acres may be designated for exclusive non-motorized use management under Alternative 7 (Table 4-22). Given that OMSI students would be restricted to designated roads and trails, most of these acres are not accessible, but can only be explored visually as part of the landscape surrounding roads and trails. Under all of the proposed alternative management plans, groups identifying themselves as “rockhounders” or “hunters” can presumably wander through more than 331,000 acres, but an organized science research group under an SRP would be limited to “only a few developed and maintained hiking trails...” that exist on BLM-administered lands in the planning area.

Cows can graze on at least 228,685 acres, with their four feet and 1000 pounds vs. two feet and two hundred pounds maximum of most hikers. The ridiculousness of allowing cows unlimited access of the Upper Deschutes, but restricting low impact humans from hiking off trail is evident.

Ironically, the “Big 4” users currently being reviewed (BMPRD, HDM, COCC, and OMSI) may be some of the most conscientious users of public land, incorporating strong educational components to programs that often include promotion of Leave No Trace ethics among participants. These four organizations may be some of the BLM’s best allies in achieving the stated vision of how public lands would be managed in the future, a vision that includes:

"Commercial recreation opportunities provide a public service while protecting resource values and minimizing conflicts with other recreationists and adjacent landowners." (pg.27, chap. 1, vol. 2)

The following are changes that we would like to see in the UDRMP Draft for BLM management strategies under all the alternatives proposed:

1. Specifically state that cross-country travel on foot is allowed under all alternatives. Allow users who are traveling on foot the same access to all areas, without restriction to designated roads and trails, that are open for mineral exploration, rockhounding, livestock grazing, and hunting.
2. Work with Special Recreation Permit holders and Group users to educate them about wildlife, vegetation and habitat, archaeological, and other land management concerns, so that these areas can be avoided during sensitive times of the year. Commercial SRP holders can then provide a public service while protecting resource values and minimizing conflicts with other educational program participants and adjacent landowners.

We, of course, agree that "All areas having special status plant or animal species would be designated as avoidance areas."

We hope you take our concerns seriously and implement changes to your alternatives that will allow OMST's participants and those in other educational groups access to their public lands in not only a non-consumptive, non-deleterious manner, but as part of an education program that teaches the public how to lighten their impact on the environment and increases their awareness of the plant and animal communities of our public lands. .

Sincerely,

Joseph Jones
OMSI Science Camps Director
7171 SW Quarry Ave.
Redmond, OR 97756
541.548.5473
Fax: 541.504.8365
jppjones@omsi.edu

#1294



"William John Kuhn "
<William@RiskFactor .com>
01/15/2004 10:52 AM

To "BLM - UDRMP" <Upper_Deschutes_RMP@or.blm.gov>
cc
bcc
Subject Draft UDRMP



040115_Prinevill BLMUDMPcomments.pdf

1294

William John Kuhn

Martha Leigh Kuhn

PO Box 5996 Bend, Oregon 97708-5996

Phone: (541) 389-3676

Thursday 15 January 2004

Prineville BLM
Draft UDRMP
3050 N.E. Third Street
Prineville, OR 97754

Upper_Deschutes_RMP@or.blm.gov

Regarding the Draft UDRMP due 20040115.4

We appreciate the opportunity to respond to the draft UDMP. We also appreciate the efforts of the various committees involved in shaping this draft plan.

We don't yet clearly understand many aspects of the plan even though we attended a presentation meeting, examined the exhibits, and talked to members of the staff, etc. We don't understand all the repercussions short term or long term of the preferred option.

Our concerns and questions include the following:

Some of the draft plan, including some of the preferred option, is based on assumptions that are in our opinion badly flawed. An example of this is the assumption that wildlife use and domestic animal grazing on the same site is compatible. This, from personal observation during time spent working on projects for the U.S.F.S and Oregon Fish and Wildlife, is untrue.

One of the areas designated for grazing permits to be allowed under the draft plan is near Tumalo Reservoir. This area is in the middle of the Tumalo wintering deer range and deer migratory corridor. The State of Oregon and Deschutes County recognize this as an entity known as The Tumalo Winter Deer Range with specific land use restrictions. Elk disperse through this area in summer, and cougars include it as part of their year-round home and hunting territory. It also is used frequently for horse recreation and hiking. None of these current and historic uses are the least compatible with livestock grazing. There are no fences, and there has been no grazing here for fifty to sixty years or more. Depending on the exact boundaries of inclusion, natural springs, and rare plants are part of this area. So, why was this isolated area chosen to have a grazing designation in the new plan?

In areas of similar habitat; Ponderosa pines, bitterbrush, bunch grasses etc, we have observed seasonal grazing that left the land with concrete soil, noxious weeds, no cover available for wildlife or food for browsing animals, some tree damage, and removable stock tanks containing bird and animal corpses (even some species of concern). This is NOT compatible with wildlife needs or a thriving habitat. We are not personally as familiar with the many other areas marked for grazing permits allowed, but it is probable that some of these areas include similar characteristics and wildlife. We believe there should be a more thorough inventory of the land being designated for possible grazing. Just having a certain percentage available is not the best way of "managing".

Another concept we believe is flawed is the multiple use theory on all federal land. This isn't based on common sense or the best interest of the land, wildlife, or ultimately, our best interest. The draft plan does include areas of special concern and some of the more destructive uses are supposed to be restricted in these areas, which is a good step forward. We would like to see the draft plan include more careful categorizing. With already heavy diversity loss of both plants and animals and the changes predicted due to global warming, decisions made now in ignorance will come back to haunt us. We think there should be something like a bi-yearly evaluation of the Plan, and an inventory of all habitats.

Two other concerns we don't think the draft plan sufficiently included were enforcement issues, and the lack of cooperation with other government agencies. This includes the other federal oversight agencies,

state agencies (Oregon Fish and Wildlife ODOT etc.), and local governments including Deschutes County Sheriff's Office. Regarding the enforcement currently in effect...there rarely is any. On weekends there is no one at BLM to respond to lawbreakers activities, and no state or local enforcement personnel can take up the slack without specific coordination with BLM. Sisemore Road in Deschutes County is a good example with weekend drag races with unlicensed off road vehicles on Sisemore, and destructive off road riding through the BLM areas of environmental concern. We believe better cooperation, sharing of goals and information, and even equipment (like heavy equipment to close roads) is a more efficient use of public funds, and would promote better "management" on all public lands. It would also benefit citizens living in proximity to federal land. It would help local government in land use issues to understand the goals and needs of public land where it checkerboards with private land It should not be up to private citizens to try to force local government to be responsive to what is required for the bigger picture. There should be staff at BLM whose job is to coordinate these things.

The last issue of concern in the lack of specific census of plants in animals in many of the areas where corridors for migration are essential, and in areas where human development is encroaching at a fast pace. Without this knowledge, planning is a waste of time. It can make matters worse since there is no baseline of information or understanding of what is needed. The plan doesn't include what we believe are crucial elements, systems, or programs to obtain this information. There needs to be more education of the public, more ongoing programs for the public to be involved in a hands-on way with their land. We think this would help promote an agreement on goals and values making management actually work.

Thank you,



William and Leigh Kuhn
PO Box 5996
Bend, OR 97708-5996
541 389 3676
William@RiskFactor.com

1295



Wmibd@aol.com
01/15/2004 11:44 PM

To Upper_Deschutes_RMP@or.blm.gov
cc
bcc
Subject Comments on draft UDRMP

Attached please find the comments of the Wildlife Management Institute on the Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement. Thank you.

Bob Davison
Northwest Field Representative
Wildlife Management Institute
20325 Sturgeon Road
Bend, OR 97701

Phone: 541-330-9045
Fax: 541-382-9372 (fax)
Email: Wmibd@aol.com



<http://www.wildlifemanagementinstitute.org> UDRMPdraftEIS_WMI.doc



Wildlife Management Institute

20325 Sturgeon Road • Bend, Oregon 97701
Phone (541) 330-9045 • FAX (541) 382-9372
E-mail - wmi@bend.com

ROBERT P. DAVISON
Field Representative

ROLLIN D. SPARROWE
President

RICHARD E. McCABE
Vice-President

January 15, 2004

Bureau of Land Management
3050 NE Third Street
Prineville, OR 97754

Attention: Teal Purrington

To Whom It May Concern:

I am writing to submit the comments of the Wildlife Management Institute (WMI) on the Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement (Plan). WMI, founded in 1911, is a private, nonprofit, scientific and educational organization staffed by experienced natural resource professionals dedicated to improving the management of wildlife and wildlife habitat in North America.

WMI commends the Prineville District staff for their extensive and lengthy collaborative efforts with a diverse array of interests and government agencies in development of the draft Plan. In our view the process used to develop the draft Plan was a fair and open one that allowed those involved to learn from others and understand their perspectives. This model effort helped to result in a high quality product.

The range of alternatives presented in the draft Plan adequately addresses the issues in the planning area. Of these alternatives, WMI believes that the Preferred Alternative (Alternative 7) presents the best vision for future management of BLM lands in central Oregon and represents the best balance of land uses. Key components of this vision for WMI are an emphasis on management of vegetation and wildlife source habitats to restore an historic range of variability and the high proportion of lands managed for ≥ 70 percent habitat effectiveness. In many respects, the management choices represented in Alternative 3 would be most beneficial to wildlife and wildlife habitat. However, in our view, Alternative 7 achieves most of those benefits in a manner that better balances multiple uses of the land. We are particularly pleased that common to all alternatives in the draft Plan is a commitment to implement the Greater Sage Grouse and Sagebrush Steppe Ecosystems Management Guidelines (BLM IB No. OR-2000-334).

1295

Bureau of Land Management

January 15, 2004

Page 2

Other than restoration of sage steppe habitats, the main issue facing sage grouse and pronghorn in the planning areas is the negative impacts of motorized travel. For deer and elk, the most important issue is to address the negative impacts of motorized travel during the winter. The southeast portion of the planning area provides the only habitat within the planning area for sage grouse and provides some of the most important habitats for elk, deer and pronghorn. Because this area also is among the most popular for motorized recreation, the potential for adverse effects to wildlife is greatest in this portion of the planning area. The approach taken in Alternative 7 to implement a road and trail system in North Millican that reduces road and trail density to no greater than 1.5 miles per square mile and, equally importantly, emphasizes retention of large, unfragmented blocks (preferably 2000 acres or greater) of habitat throughout the area is essential to achieving the wildlife goals of the Plan. In the interim while this road and trail system is developed and other existing roads and trails are closed and rehabilitated, we support Alternative 7's retention of existing seasonal closures (December 1 through April 30). Further, we suggest a cautious adaptive management approach to shifting from seasonal closures to limits on motorized road and trail density in North Millican. The initial transition from seasonal closures should limit road and trail density to less than 1 mile per square mile and should be accompanied by carefully designed and implemented monitoring. In South Millican, it is key to the Plan to retain the existing seasonal closure (closed to motorized use from December 1 through July 31).

A key issue that WMI believes is not addressed adequately by Alternative 7 or any of the other alternatives is an overarching issue that is integral to all issues: "How will the extent of Plan implementation and its effectiveness in resolving identified issues be determined?" Monitoring and documenting the BLM's progress toward full implementation of the draft Plan must be addressed far more thoroughly. Such monitoring should provide information on whether actions called for in Plan decisions actually have been implemented.

Of equal or greater importance is monitoring designed to provide information on the effectiveness of actions when implementing Plan decisions. Effectiveness monitoring methods and standards should be structured to respond to the issues and concerns expressed by the public. It should, for instance, respond to the question of "whether the land use plan decisions and NEPA analysis are still valid" and whether "the allocations, constraints, or mitigation measures [are] effective in achieving objectives."

Effectiveness monitoring and evaluation should be explicitly integrated with Plan actions and accompanied by a commitment to establish thresholds for various resource parameters that have been identified as triggers or indicators that a new decision is required. These triggers should be derived from the desired future conditions set forth in the Plan. We recommend that this process, which provides an objective, science-based means of determining whether a new plan decision is required, should be used in any alternative selected for the final Plan. This kind of sequential reappraisal of land use decisions is necessary to make the planning process a credible protection mechanism for the public's broad interest in the affected resources.

1295

Bureau of Land Management

January 15, 2004

Page 3

We believe all monitoring upon which decisions are based should be a rigorous process designed to meet site-specific needs. This process should include obtaining accurate and current data; construction of hypotheses related to implementation and effectiveness of aspects of the Plan; design of monitoring protocols to provide information relative to testing these hypotheses; and adaptive management protocols in response to monitoring and hypothesis test results. In short, management under the Plan should be conducted as an experiment so that ten years from now we will have learned as much as possible about the effects of our land management activities. We encourage the BLM to secure funding to improve on this important aspect of planning and Plan implementation. We also recommend that the Plan have an annual monitoring plan.

Thank you for a job well done and for your consideration of our comments on issues to be addressed in the Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement. Please ensure that we receive a copy of the final Plan/EIS.

Sincerely,



Robert P. Davison, Ph.D.
Northwest Field Representative

1296



To <Upper_Deschutes_RMP@or.blm.gov>

cc

bcc

01/15/2004 11:42 PM

Please respond to
bendcable.com

Subject Comments on the Draft Upper Deschutes Resource Management Plan and EIS

Today's Date: 1/15/04
Your name (please **print**): _____
Representing (put an **X** in one box only):
X self only

Street Address, State, and ZIP: _____, Bend, OR 97701
Phone: _____ E-mail: bendcable.com

Please withhold my personal information from the record.

Thank you for this opportunity to comment on the Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement. I believe public participation is vital to a successful and realistic implementation of such a major planning effort. As such, I submit these comments as a member of the public and not in my employment capacity as Outdoor Recreation Planner for the Prineville District of the BLM. I both work and recreate on Public Lands and feel passionate about the future of our public lands.

Generally, I support the propositions in Alternative 7 (the preferred alternative) with some modifications and clarifications. The population of Central Oregon has grown to a saturation point where recreation user conflict is rampant and widespread. The appropriate mechanism for achieving a balance of use is thru the use of recreation zoning. The following are my specific comments on the draft plan:

Correction:

- On several maps, lands known as "Felony Flats," east of Redmond (but inside the UGB) are shown to be public; however, these lands were disposed of in 2003

Specific Recommendations:

Land Tenure

- Those areas with a Zone 2 designation in Alternative 7 including the Airport Allotment, Northwest block, Barnes Butte and Powell Buttes should be retained with Zone 1 designation. The two private 40-acres inholdings in the Airport allotment and the north part of the Badlands WSA should be considered desirable for acquisition or exchange from willing sellers.

Recreation

- The Badlands WSA is hammered by illegal OHV use and should be closed to all motorize use, year-round. A joint Dry Canyon-Route 8 trailhead and interpretive facilities should be developed outside the WSA, and south of the 6521 road. This could serve as the Badlands portal and is consistent with the Bureau's Interim Management Policy for Land Under Wilderness Review (IMP), and with reality. The BLM is completely failing in its charge to protect the Badlands WSA from impairment.
- Geocaching should be allowed in the Badlands and Steelhead Falls WSAs. Should this are ever be designated as a Wilderness, caches can be easily policed and removed by contacting cache owners, at www.geocaching.com . Geocaching should be prohibited in any ACEC.
- Mountain biking should be prohibited within Badlands WSA consistent with IMP guidance. The quality of riding is rather poor here most of the year anyway.
- A group size limit of 12 should be imposed (including Special Recreation Permits) within Steelhead Falls and Badlands WSA
- Develop trail easements or other appropriate access mechanisms from willing landowners to provide public access to Barnes Butte, the Powell Buttes, the Lower Crooked River (adjacent to Crooked River Ranch) and the Middle Deschutes River
- Existing informal trailhead facilities should be moved off of Old Highway 20 (proximate to the 6561) Road and onto an existing impacted area adjacent to the road so as to provide safe access to Horse Ridge.
- Powell Buttes should be closed to motorized use.
- Existing mountain bike trails within Horse Ridge RNA should be relocated outside the RNA boundary.
- Alternative 7 delineates the north slope of Horse Ridge (the 6516-AB road) as the recreation emphasis boundary between Non-Motorized Recreation Exclusive and Non-Motorized Recreation Emphasis (see Map 21, T19S R14E). This road is the source of major problems in illegal vehicle hillclimbing, one huge scar which can be seen from Badlands Rock. Given the wholesale destruction of these north slopes and the Class 2 VRM class assigned to this area, I believe that the Recreation Emphasis boundary should be moved slightly west to the 6516 Road. This would be far easier and less expensive unit of land to manage.
- The concept of regional trails connecting Pilot Butte to Smith Rock State Parks and connections between Bend, Redmond and Sisters should be emphasized.

1297



"Stephen"
<stephen@internetextension.com>
01/15/2004 11:08 PM

To <upper_deschutes_RMP@or.blm.gov>
cc
bcc
Subject Comments on The Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement

Comments on The Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement

Stephen Roth
Pine Mountain Allotment Permittee (5211)

General Comments:

The Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement provides no direct benefit to my operation and therefore I prefer alternative one—no change. As a citizen, it is possible to see possible benefits from the plan for Central Oregon. The plan is massive in scope and acreage. I've been working with the Forest Service on their Opine EA. It is for 54,623 acres (1/8th of the land mass of the Upper Deschutes Resource Management Plan) and it has been broken into three separate EA (four if you include the Cinder Hill EIS which covers much of the same area.) My comments are only for the southeast portion of the plan, as I have no experience with 7/8th of the area. It seems more logical to follow the Forest Service method of smaller areas, or single issue EAs.

Sage Grouse:

Sage grouse are a species in decline from several different reasons. A paper "Management Guidelines for Greater Sage-Grouse and Sagebrush-Steppe Ecosystems" dated August 21, 2000 that was a collaborative work between the BLM, USFWS, USFS, ODFW, and ODSL lists juniper expansion as one of nine threats to the species. Map 6 (from the EIS) shows the Priority Restoration Areas for Sage Grouse, and Map 4 shows vegetation types. If a person draws a line from Prineville Reservoir to the south end of Bend, everything to the southeast is listed as "Priority Sage Grouse Restoration." If the same line is drawn on Map 4, it is easy to see that over 50% of the land mass is covered in Western Juniper. From the above cited paper, (and numerous field trips) we know that Sage Grouse and Western Juniper do not co-exist. The map should be redrawn to reflect the area of scientifically plausible sage grouse habitat. Or the plan should specify the removal of invasive Western Juniper stands. Sweeping land use designations have a history of getting this State into unforeseen problems.

On page xxxviii of the Executive Summary there is a comparison of the different alternatives for the Special Management Areas. For alternative 7 there are zero acres of ACEC for Sage Grouse. On Map 7 there is a large ACEC shown for Sage Grouse. Does alternative 7 include a Sage

Grouse ACEC in the southeast portion of the planning area?

Road Closure:

South Millican OHV area is currently closed from December 1st through July 31st. This coincides well with my grazing plan, as the yearling cattle are sold during the middle of August. This eliminates the conflict between cattle and rule-obeying OHV users. On my allotment, the trail system through its use of cattle guards and routing around wells, minimizes impacts due to: vandalism of roads, fences, and water developments. OHV use on Pine Mountain out of the designated areas (Forest Service land) causes cut fences and destruction of roads and watering areas from OHV "cookies" eroding the ground.

During the OHV closure period I need access to roads (not OHV trails) to manage the cattle. From the Draft Environmental Impact Statement it was not clear if only trails would be restricted, or roads for all vehicles. A restriction on all vehicles, on all roads would be impractical as it would block of individuals from legal access to their private property. Hopefully road restrictions would only be enacted after consultation with either the private land owners who may need access or permittees who need to manage their cattle. Roads closed for use only by only certain groups tends to create ill-will between user groups. Ranchers can get the blame for restricted roads and have fences cut or other retaliatory measures taken against them. If roads are closed, the reasons for the closure should be posted. Most people obey the rules when they understand that there is high fire danger, or nesting birds, or highly erodible soils.

All OHV trails should be routed around private property. Enforcement of non-shared use roads would reduce conflicts between highway vehicles, home owners, and OHVs. Keeping OHVs on trails and off of roads is most desirable to reduce conflicts and safety hazards.

Burning:

Under alternative 7 there are 3,838 acres prescribed for burning per year. This is less than 1% of the 400,000 acres covered in this EIS. Less than 3% of the land is going to be mechanically treated per year. This year a BLM prescribed burn was planned for the Stud Horse pasture out near Hampton that was in excess of 10,000 acres. That burn would have taken 2.5 years if it was in this planning area. The burn wasn't carried out due to a lack of fuel. The Forest Service in the Draft Opine EA are proposing to treat 21,197 out of 54,623 acres. (38.8%) It appears that in the EIS your ability to manage land has been restricted to less than 4% per year. It is obvious that there are enormous tracks of Western Juniper that has encroached on Sage Grouse habitat that the BLM won't have the tools to restore to Pre-Euroamerican settlement conditions. The science calls for fire, the people call for fire, even our Congress passed laws this year for more fire. Why is there virtually no fire in the plan?

Grazing:

Voluntary reductions in grazing, or relinquishment of permits is fair and equitable. If a rancher is forced to give up a grazing allotment, they should be reimbursed.

In chapter 4 the Environmental Consequences were discussed. There was a question about what ranchers would do if grazing was eliminated or reduced, so I will answer for my specific situation. One fourth of my forage comes from intermingled private and BLM lands. If the BLM permit was revoked, I would have no choice but to subdivide my land and sell to hobby ranchers, or recreationalists. If the BLM grazing permit was reduced, I would be forced to fence my private land from BLM lands. To maintain my herd, I would have to remove the native species (sage brush) and plant to highly productive non-native grasses. This would have negative consequences for Sage Grouse, deer, and antelope which use my land. The newly fenced property would be posted to keep all trespassers out: bicyclist, motorcyclist, hang-gliders, rock-hounds, hunters, or hikers. Private roads without easements through my property would be locked. The visual resource would change. As the EIS is written, none of this will need to happen, and these consequences were correctly pointed out in chapter 4. I have a fear that some environmental groups do not realize that if the grazing is severely curtailed in the name of Sage Grouse protection, their habitat will be even further reduced by the only options left for landowners.

Summary:

The EIS covers too many acres and too many subjects. Maintaining adequate habitat for Sage Grouse is important, but must be done using the parameters that scientists have determined. Fire and mechanical treatments are tools to manage this vast land. We must manage more than 4%. Livestock grazing is an important component of the landscape. Will what fills the vacuum from its removal be better on any level: economic, environmental, or social?

1298



"Clair Kunkel"
<Clair.M.Kunkel@DFW.STAT
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01/15/2004 08:01 PM

To <upper.deschutes.RMP@or.blm.gov>
cc
bcc
Subject ODFW Comments: UDRMP DEIS

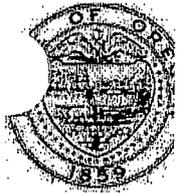
Comments attached. A signed copy with attachments will be mailed tomorrow.

Thank you.



UDRMP Final Comments.doc

#1298



Oregon

Theodore Kulonowski, Governor

Department of Fish and Wildlife
High Desert Region
61374 Parrell Rd.
Bend, OR 97702

Phone : 541-388-6363
FAX : 541-388-6281

January 15, 2004

Bureau of Land Management
3050 NE Third Street
Prineville, OR 97754



RE: ODFW Comments on Draft Environmental Impact Statement for the Upper Deschutes Resource Management Plan

OVERVIEW

The Oregon Department of Fish and Wildlife (ODFW) has reviewed the Upper Deschutes Resource Management Plan Draft Environmental Impact Statement (DEIS). The DEIS proposes to revise management on 404,000 acres of Bureau of Land Management (BLM) lands located between Millican, Prineville, Sisters, Bend and La Pine. This area has a rapidly growing population base resulting in user conflicts, impacts to natural resources, public health and safety concerns, wildland urban interface challenges, new plant and animal species listings, resource extraction concerns, protection of archaeological resources, and the need for new or modified transportation and utility corridors. The DEIS goals are to:

- *Sustain and where necessary, practical, and within available funding, restore the health of forests, rangeland, aquatic, and riparian ecosystems.*
- *Provide a predictable, sustained flow of economic benefits within the capabilities of the ecosystems.*
- *Contribute to the recovery and de-listing of threatened and endangered species and 303(d) listed waters.*
- *Provide diverse recreational and educational opportunities within the capabilities of the ecosystems.*
- *Manage natural resources consistent with treaty and trust responsibilities to American Indian Tribes.*

This is an aggressive and progressive resource management plan that addresses historic versus current vegetative conditions, wildlife habitat fragmentation and habitat change, motorized and non motorized recreational activities, livestock management as it is tied to rangeland health, land tenure, public health and safety issues, transportation and utility corridors, along with a number of other issues facing the BLM on 404,000 acres in the upper Deschutes River basin of central Oregon.

The DEIS identifies seven alternatives that include:

- 1) continuation of existing direction
- 2) management of issues on a case-by-case basis
- 3) reducing conflicts between human use and wildlife habitat management objectives
- 4) emphasizing recreational uses
- 5) reducing conflict activities and providing higher wildlife habitat within the urban area
- 6) reducing conflict activities and providing higher wildlife habitat within the rural area
- 7) Preferred Alternative that combines various features of the other six alternatives

ODFW supports the Preferred Alternative (7) with seasonal closure modifications to motorized vehicles on identified primary wildlife emphasis areas in the North Millican, Millican Plateau, and Prineville Reservoir geographic areas to protect wintering big game species. ODFW supports the motor vehicle restrictions and closures in the Badlands, Horse Ridge, and South Millican geographic areas to protect wintering big game and wintering, nesting, brooding, and rearing sage grouse in the South Millican geographic area. ODFW **recommends** these modified seasonal closures due to impacts that Off Highway Vehicle (OHV) activities have on wintering big game

species and sage grouse. Due to cumulative impacts occurring in the North Paulina Unit, ODFW has not met the established management objective of 5500 wintering mule deer since 1981.

ODFW commends the BLM Prineville District staff for their unprecedented effort to engage and obtain meaningful input from a broad cross section of public perspectives. ODFW appreciates the opportunity to fully participate and provide input. Recognizing the difficulty it would take to implement developed strategies, the BLM chose to engage the public up front and throughout the process with the hope that public assistance would be provided during plan implementation and maintenance. To this end, the BLM will reconvene public participants in the spring to review DEIS comments and provide recommended changes to the seven alternatives. ODFW also recognizes Mollie Chaudet, project manager, on her skill and ability to hold this process together, keep it on track and on schedule, and to facilitate the production of the DEIS.

ODFW offers the following comments on the DEIS:

MONITORING

The DEIS does not include a monitoring plan to assess effectiveness of the actions identified under each alternative. ODFW recommends that an effective monitoring plan be included, to assess effectiveness and allow for adaptive management to ensure that objectives are met. For example, Alternatives 2-7 call for some very complex motorized and non-motorized systems of shared use, separate use, limited use, and habitat effectiveness outcomes. A monitoring plan is critical to ensure that habitat effectiveness objectives are met. If objectives are not met, an adaptive management approach will allow actions to be adjusted as needed.

In the event that proposed outcomes are not achieved¹, or adequate staff and funding for plan implementation is not provided², ODFW **recommends** that some sort of plan modification, or a default plan, be identified and described that will provide for natural resource protection.

MILLICAN PLATEAU

Page 133, "Snow depth would be measured at the current designated measurement locations and averaged." ODFW **recommends** that the rationale be provided for selecting specific measurement locations and snow depths. As noted in ODFW's (12-20-99) letter to BLM regarding the Millican OHV judgement (Attachment 1), a positive correlation was established between snow depth at the Hungry Flat Snow Course (vicinity of the Inn of the Seventh Mountain) and overwinter survival of mule deer in this portion of the North Paulina Mule Deer Winter Range for surface mining restrictions. Since 1999, no description of BLM's snow measurement locations or the rationale behind the selected locations and snow depth by time period has been provided.

ECOSYSTEM HEALTH AND DIVERSITY

This section contains an excellent overview of the major vegetative types, important wildlife species, hydrological conditions, geology, and other natural resources along with factors that may affect the sustainability or proper function of these resources over time. This comprehensive information allows readers to better understand how the proposed alternatives may cause changes that affect existing natural resource conditions across the planning area.

Two of the major themes, Historic Range (Alternatives 3, 6, & 7) and Current Distribution (Alternative 2, 4, & 5), are perplexing. Conceptually, the themes of restoring vegetative associations, wildlife species distribution and connectivity, hydrological functions, etc., are understandable either within current distribution or within historic range. Yet when the plan is considered as a whole, much of the proposed DEIS management direction for Alternatives 2-7 could preclude

¹ DEIS Page 478, Travel Management/ Recreation Emphasis Designation – "However, given the amount of acreage identified for designated road and trail systems, it is likely that in the short term, many areas will not undergo specific road and trail planning and will either remain as unmanaged travel networks or have interim systems implemented that do not offer quality recreation experiences due to a lack of quality road/ trail facilities/ alignments or just an overall shortage of road/ trail miles contained in interim systems (which will likely rely heavily on roads versus trails)."

² DEIS Page 326, Implementing the Alternatives – "For the purposes of this analysis, we have assumed that existing resources and personnel would be redistributed to respond to new priorities set by this plan, although the amount of work accomplished annually to meet plan direction would continue to be dependent upon annual budgets and overall BLM priorities."

the desired outcomes – such as fuels reduction in the wildland urban interface, open roads and trails to motorized vehicles, exotic and noxious weeds, access Right of Ways (ROW) to private property, and livestock grazing and fencing. To address this dilemma, ODFW **recommends** site specific NEPA planning during plan implementation, to allow a more thorough analysis and evaluation of the desired social values in each geographic area in the context of the area's ecological potential. This approach would optimize desired outcomes under either theme of current distribution or the more expansive theme of historic range.

The following two quotes by noted fire scientists provide some perspective to ODFW's recommendation: According to Agee (1996) "A note of caution should be injected into the "natural range of variability" paradigm as a model for future management of disturbances like fire. First, the range may be so broad as to be meaningless as a guide for management; almost any fire outcome might be acceptable in this situation. Second, we are not dealing with the ecosystems of historical times. Even "natural" areas are surrounded by severely manipulated landscapes."³

And Schmidt (1996) "I would suggest that "restoring" fire, that is to say, going back to the way it was historically, is a fool's errand because it is NOT sustainable. It is not sustainable for three reasons: social demand, economic considerations, and the changing nature of the ecological system itself."⁴

WILDLIFE

The wildlife information compiled for this planning effort is impressive. Updating wildlife range and distribution maps, creating a criteria base from which to evaluate values and impacts to wildlife, identifying source habitats and priority restoration areas all took an incredible amount of time and dedication to develop and produce the volume of information provided. ODFW recognizes Bill Dean and the BLM staff who assisted him in this effort to produce comprehensive wildlife information while working under shifting alternative strategies and staff time limitations.

WILDLIFE EMPHASIS LEVELS

Page 37 – ODFW supports the concept of creating wildlife emphasis levels. However, under primary wildlife emphasis the plan states that "Areas allocated to *primary emphasis* are intended to benefit wildlife and retain high wildlife use by applying one or more of the following guidelines:

- Target habitat effectiveness for a geographic area at 70 percent or greater;
- Where possible, maintain large, un-fragmented patches (1000 to 2,000 acres);
- Target low densities of open motorized travel routes (<1.5 mi/mi²)
- Rate as a high priority for habitat restoration treatments."

ODFW **recommends** that at least the first three and preferably all of the guidelines be applied for primary wildlife emphasis areas. Implementation of the first three guidelines is consistent with the Habitat Effectiveness values provided in the DEIS for each geographic area by Alternative.

ADAPTIVE MANAGEMENT

Page 349, Sage Grouse, last sentence, "However, Alternative 7 would also take an adaptive management approach at meeting both wildlife and recreational needs in the North Millican geographic area." It is not clear how the plan will "take an adaptive management approach" if an adaptive management methodology has not been established. ODFW **recommends** that the stated adaptive management approach be clarified, including monitoring criteria that would trigger management changes.

ASSUMPTIONS

Page 351, ninth bullet, "Standard design features described in Chapter 2 will be applied as described." Please specify what the described standard design features are in Chapter 2?

³ Agee, James K., 1996, Fire Regimes and Approaches for Determining Fire History. In GTR 341 The Use of Fire in Forest Restoration. June 1996.

⁴ Schmidt, Gordon R. 1996. Can We Restore the Fire Process? What Awaits Us if We Don't? In GTR 341 The Use of Fire in Forest Restoration. June 1996.

HABITAT EFFECTIVENESS (HE) (>70% PRIMARY, >50% SECONDARY, <50% MINOR)

Page 352 – ODFW supports using as a model *The Habitat Effectiveness Index for Elk on Blue Mountain Winter Range*, and incorporating modifications based on findings in Rowland et al. (2000). However, it is difficult to understand how the habitat effectiveness ratings were derived, and whether they adequately assess potential habitat impacts under the proposed alternatives. Without implementing the model consistently and as designed, the HE values will have limited application for comparing loss of habitat effectiveness under each motorized access proposal. ODFW **recommends** that the model be carefully implemented to allow accurate assessment of habitat impacts under each proposal. ODFW **recommends** modifying the modeling approach described on Page 205 in the North Millican Area that excludes consideration of motorized trails within ¼ mile of roads or ROW. ODFW can support excluding trails in the HE calculations that are part of the ROW. However, trails outside of ROWs should be included as part of the total road mileage used to calculate HE and in reaching motorized density goals for a particular area. The following DEIS examples provide conflicting information regarding how habitat effectiveness calculations were derived and applied:

- Page 36 under Habitat Effectiveness, “*The approach used in this plan is to identify source habitats by general vegetation types and to display habitat effectiveness by alternative as it relates to the amount of influence of open roads and un-fragmented patch size.*” (also see page 37, Primary wildlife emphasis, which contradicts this statement, “apply one or more”).
- Page 205 under North Millican, “*The road and trail system densities for the area would be limited to a range of approximately 1.5 miles per square mile. Trails located within existing road or ROW corridors (i.e., parallel to, with ¼ mile or less from existing roads or ROWs) would not be calculated as separate trail or road miles in reaching density goals for the area.*”
- Page 349 under Transportation Management Assessment, “*This analysis only considers the allocation of arterial and collector roads and does not give a complete picture of the effects and management implications, especially as it relates to the management of local roads.*” See page 577 for a summary of the arterial, collector and local roads.
- Page 349 under Sage Grouse, “*North Millican appears to have the ability to achieve a high (71 percent) habitat effectiveness; however, this area is also identified to provide OHV trails that are not considered in the HE calculations.*”
- Page 350 under Mule Deer, “*As in other situations, local roads and OHV designations need to be considered before knowing the significance of any listed HE score.*”
- Page 352 under Use of other analysis and/or models, second bullet, “*Also, potential vegetation treatments could complicate the suitability of the habitat in relation to open roads...For the draft EIS, only the roads effects will be modeled.*”
- Page 353 under Common effects of some resource management programs, “*Bureau of Land Management resource management programs such as recreation, minerals, lands and forestry often effect the environment in similar ways, such as by removing habitats for site developments and road and trail construction and by causing disturbances in relation to motorized travel access.*”
- Page 358, fourth bullet, “*Using the Habitat Effectiveness index for sage grouse, deer and elk based on arterial and collector roads provides an understanding of the different levels of effects associated with the two road options...However, local roads are included in the road influence indexes for source habitats to display the current conditions and provide a comparison to the management guidelines identified for each wildlife emphasis level in each alternative.*” (also see page 37, Primary wildlife emphasis which contradicts this statement).
- Page 358, fifth bullet, “*Currently, existing data (vegetation condition) is not available to fully assess the HE, but sufficient data is available to assess the effects of different motorized travel route designations (arterial and collector roads). Local roads are not included in the HE analysis because their specific arrangement does not differ by alternative. However, a discussion of a comparison between the proposed wildlife emphasis levels is made with the HE.*”
- Page 366, under Shrub-Steppe Source Habitat, Transportation (with a similar statement page 367 under Juniper Woodland Source Habitat, Transportation), “*The analysis of transportation (motorized travel) effects on shrub-steppe source habitat (and associated wildlife species) includes all mapped roads (arterial, collector and local roads) and motorized OHV trails in the Millican Valley OHV trail system. In some geographic areas this calculation underestimates the effects of motorized travel because not all roads and trails are mapped and therefore are not included in the analysis.*”

- Page 369, under Sage Grouse, Deer and Elk, Transportation, “*In the North Millican geographic area an HE analysis was done for sage grouse, deer and elk habitats using all BLM recognized roads and motorized trails located on BLM administered lands....Please note that HE is calculated by alternative for arterial and collector roads and the results are presented in each alternative.*”

AFFECTED ENVIRONMENT

Page 264, Mule Deer – The description of deer winter ranges includes some inaccuracies and omissions. The North Paulina Winter Range information is inaccurate. The plan states that “*The North Paulina Winter Range includes 3,750 acres of public land in the Bend-Redmond management area. The management objective for this area is to maintain 5,500 deer.*” The correct information should read, The North Paulina Winter Range encompasses approximately 200,000 acres with about half-managed by the BLM and the other half managed by the U.S. Forest Service. The North Paulina winter range located in the planning area is primarily within the following geographic areas: Horse Ridge, Badlands, and North Millican (108,126 acres), with the North Millican area identified as the most critical in the Bend La Pine Resource Management Plan (B/LP RMP). ODFW management objective for the North Paulina Winter Range is to maintain 5,500 deer, which is 20 percent higher than ODFW’s population estimate of 4,400 wintering mule deer for the past three years. Furthermore, the management objective for the North Paulina Winter Range has not been met in the past 18 years. ODFW believes the following cumulative factors play a large part in this outcome:

- Increased year round recreational motorized activities including OHV use;
- Increased residential development in winter range;
- Increased Hwy 97 traffic that bisects summer and winter range;
- Decreased summer and transition range forage due to a denser forest canopy;
- Managing for homogenous stands of black bark ponderosa pine across large acreage on the winter range. 70+ year old trees tend to be evenly spaced with a raised canopy, which does not provide cover or forage;
- Loss of cover and forage from recent wildfires;
- Fuel and Forest Health treatments that significantly affect maintenance of recommended deer cover forage conditions;
- An older cohort of bitterbrush that may be putting most of it’s productive energy into plant maintenance rather than annual leader growth;
- Predation and poaching;
- Significant livestock utilization of bitterbrush annual leader growth on winter range.

Additionally, there is no discussion about the winter range or management objectives associated with either the Maury or Ochoco mule deer winter ranges. ODFW **recommends** including the following information: The West Maury winter range includes all of the Prineville Reservoir Area south of the reservoir and river, and northeastern portions of the North Millican Area. The current B/LP RMP recognizes the area south of Prineville Reservoir as crucial deer winter range. ODFW’s most recent population estimate of 4700 deer is below the objective of 5200 deer for the Maury unit. ODFW estimates the West Maury winter range winters approximately 10-15% of the deer in the Maury unit.

The portions of the Prineville Reservoir area along the north side of the reservoir, including ODFW’s wildlife management area (WMA) provide winter range for Ochoco unit mule deer. This includes lands jointly managed by BLM, ODFW, Crook County, Oregon State Parks, and the Bureau of Reclamation (BOR) to protect wintering deer.

Pg. 265, Rocky Mountain Elk: Add a description of the north/south travel corridor identified in the eastern end of the Prineville Reservoir area, and illustrated on Plan Map S-10. ODFW believes this travel corridor is utilized primarily during the winter by an estimated 100 - 250 elk moving between the Maury and Ochoco units.

SENSITIVE SPECIES

The DEIS provides an extensive and comprehensive list of wildlife species of concern known to occur, or that could reasonably be expected to occur, in the planning area. ODFW supports the general direction and management guidelines presented in the Plan (pgs 44-46, Table 2-2), and urges the BLM to follow through with effective implementation and staffing to ensure monitoring occurs. Alternative 7 makes sensitive species habitat a priority for protection and restoration, which ODFW supports. ODFW believes effective implementation of these guidelines will be especially challenging given the resource demands of the growing population of people in the planning area. Two species of

particular concern are bald eagle nesting and roosting on Grizzly Mountain and Prineville Reservoir, and sage grouse using the southeast portion of the planning area.

RECOMMENDED CHANGES TO ALTERNATIVES 2 - 7

Based on the uncertainty of the HE analysis to accurately assess wildlife impacts, the lack of a monitoring plan to assess plan success, or a strategy to provide for protection of natural resources if plan goals and objectives are not met, ODFW **recommends** seasonal closures to motorized OHV use to protect sage grouse and wintering big game resources for all alternatives in the following geographic areas⁵:

Badlands, Millican Plateau, and North Millican – December 1 to April 30 to protect wintering deer, elk and antelope
Horse Ridge, Prineville Reservoir, and Tumalo – December 1 to April 30 to protect wintering deer and elk,
South Millican – December 1 to July 31st to protect wintering antelope and wintering, nesting, brooding, and rearing sage grouse.

ODFW also **recommends** dropping the seasonal OHV closure in the La Pine geographic area for all alternatives.

PUBLIC HEALTH AND SAFETY

ODFW understands the need for certain firearm restrictions and supports the measures in the Preferred Alternative that allow for hunting during all hunting seasons, including year around hunting for species that have no closed season. The Preferred Alternative strives to strike a balance between meeting public safety requirements, while maintaining recreational opportunities for hunting on most land within the planning area. However, the draft plan does not contain language that specifically allows ODFW personnel to use firearms in an official capacity on BLM lands where firearm restrictions are proposed. ODFW **recommends** the Record of Decision include a provision that allows ODFW to utilize firearms for wildlife management purposes on lands where public no-shooting restrictions apply .

LAND OWNERSHIP

Consolidation of parcels as identified in the DEIS (lands along the north side of Prineville Reservoir and adjacent to the WMA) would help maintain habitat effectiveness on adjoining deer winter range. In addition, the three parcels identified on the attached map would provide similar resource benefits and should also be considered for consolidation.

PROPOSED MOTORIZED RECREATION SYSTEMS

ODFW supports limiting OHV use to designated roads and trails for Alternatives 2-7.

ODFW is concerned that the DEIS does not include effective methods for monitoring OHV impacts, and adaptive management strategies to successfully implement the Preferred Alternative. Furthermore, ODFW is concerned that current levels of staff and funding may not be sufficient to implement the Preferred Alternative.

ODFW **recommends** that BLM present a progress report regarding monitoring actions that are specified as a result of the Interim Travel Management court judgement for the Millican Valley OHV area (3-10-2000). The progress report should provide some indication of BLM's effectiveness in monitoring OHV impacts on wildlife habitat, and provide an estimate of the levels of staff and funding required to provide effective monitoring over the entire planning area (see Recreation Summary/Assumptions page 469 DEIS). Furthermore, the summary would provide OHV use information by month and week. This information could help reviewers understand potential impacts that proposed wildlife protection seasonal closures could have on OHV use during the winter months.

⁵ Page 554, Recreation and tourism – “In Central Oregon, tourism and recreation serve as important income generators. For example, the 2001 National report (U.S. Department of Interior, 2002), shows that participants 16 years and older spent \$769 million on wildlife-watching activities in Oregon in 2001, fishermen another \$602 million, and hunters some \$365 million, representing a combined total contribution of about \$1.74 billion to the State's economy. While no precise figures exist for the planning area, it is clear that these activities are important within the regional context.”

This recommendation is consistent with the DEIS proposals to:

- a) implement a major shift in OHV use from open unless designated as closed or limited, to closed unless designated open.
- b) identify wildlife emphasis areas, assuming that OHV impacts can effectively be managed to meet the assigned HE value (70%, 50% or <50%) for each wildlife emphasis area.
- c) reassign current levels of staff and funding to effectively implement these strategies.

Judgement #8 in the Interim Travel Management Plan, March 10, 2000, states, "*BLM shall schedule monitoring of OHV use for each weekend during the months of December through April as well as additional monitoring mid-week in March and April. The data collected shall include user numbers and rate of compliance with trail system rules. Occasional failures to monitor due to unforeseen circumstances (e.g., illness, weather creating safety risks for personnel) shall not constitute a violation of this judgement. This final judgement shall not be interpreted to require the BLM to allocate law enforcement personnel to policing the Millican Valley Area beyond those personnel that the Field Manager, in her discretion, deems necessary for the proper management of public lands. However, the BLM shall seek additional law enforcement funds from the State of Oregon ATV Committee for the purpose of carrying out the restrictions on OHV uses in the areas described by this final judgement.*" The Millican Valley OHV area judgement includes the following DEIS geographic areas: Horse Ridge, South Millican, North Millican, Millican Plateau, and Badlands.

ADJOINING PUBLIC LANDS

ODFW **recommends** the BLM manage their lands consistent with or better than habitat conditions on adjoining public lands to provide for wildlife connectivity and distribution.

ODFW appreciates the opportunity to review the DEIS and provide comments to BLM. Upon request ODFW will provide clarification to our comments or work with BLM staff and other participants to develop solutions to the issues we raise. ODFW presents these comments as a means to refine the DEIS by helping to clarify plan direction and potential outcomes.

Thank you for the opportunity to fully participate in the process.

Sincerely,

Alan R. Dale
High Desert Region Manager
Oregon Department of Fish and Wildlife

1299



"John Gill"
<john@rocksprings.com>
01/15/2004 08:05 PM

To <upper_deschutes_RMP@or.blm.gov>
cc
bcc
Subject Comments on UDRMP

Hi,

Here are my comments to the plan. I also sent them by mail today, but I thought since it was the deadline today I should email them as well.

Thanks,

John Gill



BLM comments 1.14.04.doc

#1299

January 14, 2004

Bureau of Land Management
3050 N.E. 3rd Street
Prineville, OR 97754

To Whom It May Concern:

I have read and reviewed the BLM Upper Deschutes Resource Management Plan and have attended meetings to discuss the plan.

Of critical importance to me is the part of the plan that deals with the BLM Wierleske allotment referred to in the plan as the Tumalo Block – 700 acre parcel south of Tumalo Reservoir Road. This is a minuscule piece in the overall Upper Deschutes Management Plan, but it is a critical piece to Rock Springs Guest Ranch since it provides the only access corridor to our other permitted riding areas on the Deschutes National Forest and Crown Pacific timberland.

Rock Springs Guest Ranch has been the steward of this parcel of land for over 35 years, dating back to 1968 when Donna Gill purchased land adjacent to this BLM allotment and built a guest ranch. Grazing permits on this allotment were transferred when she bought property in 1968, and at later dates we further formalized our connection through acquiring a special recreation use permit and through the adopt a space program. Our private land borders this property for 1.25 miles.

Inspection of this property will reveal that it is in excellent condition, especially considering its proximity to Bend. Very little off-road vehicle use, garbage dumping, or use conflicts have occurred.

I've tried to reference my comments to specific topics and areas of the plan, however, the information is repeated in many places throughout the plan and is often commingled. Below are my comments relative to the plan and the Wierleske allotment.

I. Special Recreation Permits & Designated trails(vol. 2, pages 200,207,208, 477,479)

A) All alternatives of the plan, except number 1, indicate that:

“Special Recreation Permits for trail dependent annual use would only be issued for designated trails that are part of the BLM’s transportation system.” (vol. 2, page 200)

“This would change the overall management emphasis of BLM lands in the planning area in a fundamental way, removing the emphasis on exploration, user choice, and self-creation of recreation opportunities.”(vol. 2, page 477)

As stated in the plan, designated trails are a new concept for BLM recreation that is a significant change in direction from prior dispersed use. Accordingly, the Wierleske allotment has no designated trails at this time. The BLM has requested that we GPS these trails which we are in the process of doing.

B) Common to Alternatives 2-7, Special Recreation Permits/group uses page 479

“Over the short term, all annual special recreation permits for trail use would not be renewed until such use was authorized on designated trails that are part of BLM’s transportation system. Over the short term, this would eliminate the two annual SRP’s for equestrian use in the planning area. However, this would also provide an impetus for trail designation in areas that currently do not have any identifiable trail systems.”

Rock Springs Guest Ranch has had Special Recreation permits from the BLM since 1991 and has operated a horseback riding program on the Wierleske allotment since 1969. Prior to 1991 the BLM didn’t deem it was necessary to have an SRP for this small piece. The prior owners of the guest ranch property, the Vansickle family, had also run a riding stable at this location for many years.

Our business has been built around a riding program that is dependent on the adjacent BLM parcel for trail rides and to access our other permit riding areas on Deschutes

National Forest(DNF) and Crown Pacific properties. We have spent 35 years creating a reputation and building a client base for our week-long summer family program that brings people from all over the world to enjoy a horseback riding centered vacation in central Oregon.

The implementation and approval of a designated trail system could be years away. To eliminate our permits, even over the short term, will block our access to our other permitted riding areas. A cancellation or non-renewal of our permit until the "designated trails" are implemented would devastate our business. If Special Recreation Permits under these plans are only to be issued for use on designated trails, then the existing permittees(Rock Springs Guest Ranch and Equine Management) should be given a reasonable time frame for this system to be put in place.

The plan needs to be modified to allow for our continued use of the Wierleske allotment until such time that we can work with the BLM to develop and authorize these designated trails and add them to the BLM's transportation system.

C) "Over the long-term, as more designated trails (both motorized and non-motorized) are developed, it is likely that this policy would direct annual recreation permits to larger areas with substantial trail systems. Smaller commercial operations and commercial operators that are tied to a specific location(e.g., small guest ranches) would have a harder time gaining permits if they are located adjacent to BLM lands that do not have designated trails and lack the ability to shuttle clients to larger BLM areas with designated trails." (vol. 2, page 479)

Part of the beauty of a destination vacation is being able to recreate from the base property. The horseback riding experience we provide cannot be duplicated by trucking people to another location. The adjacent Wierleske allotment is contiguous to thousands of acres of DNF land that connects all the way to the Three Sisters area wilderness boundary(BLM maps of DNF in packet do not show current land configurations since the

Crown Pacific & DNF land swap). The BLM together with the DNF land is not a small isolated block of public land. We have special use permits for horseback riding on about 2500 acres of this DNF land. In addition, we also have riding permits on about 4500 acres of Crown Pacific timberland that is adjacent to the BLM and the DNF.

D) "Large, group rides are relatively commonplace on BLM administered lands, although no designated or maintained trails exist on BLM administered lands for equestrians, and no staging areas have been developed for their use." (vol. 2, page 307)

Rock Springs Guest Ranch maintains miles of trails on the Wierleske allotment.

II. Organized Group Uses (vol. 2, pages 200, 479)

"SRP's would be required for all organized group activities involving greater than 20 participants." (vol. 2, page 200)

During our peak season in the summer, group sponsored outings to this small area would definitely create user conflicts with our operation.

III. Recreation and tourism (vol 2 , page 554)

A) "However, while tourism and recreation have this important regional role, the BLM lands within the planning area do not serve as primary tourist destinations."

In fact, Rock Springs Guest Ranch attracts visitors from all over the world to central Oregon because of its summer family vacation programming. The core of this program is daily horseback riding that takes place on BLM land.

The economic value of what we do is significant. What we call the Summer American Plan(SAP) is an all inclusive week long vacation package. It includes accommodations, all meals, recreational programming including horseback riding and childcare / youth

activities. We employ 50 staff during this time to take care of 50 guests a mix of adults and kids. Twelve to fifteen fulltime staff as well as ten additional part time staff are employed year round.

Less than 8 percent of our clients during this summer program come from Oregon and Washington so a high percentage of our clients use air transportation to get to central Oregon. Most of our clients also partake of other paid recreation activities in the area like golf, white water rafting and Wanderlust tours(canoeing, caving, nature hikes, etc..).

We are considered one of the best guest ranches in the nation. People looking for this type of high end family vacation look at a wide variety of vacation options. Geographic location is not necessarily important. They choose us primarily based upon what we offer in terms of programming.

The guest ranch experience makes available to persons all over the United States and the world access to properties held in trust by the United States government for the benefit of the citizens. Most of these people do not have the knowledge, equipment or time to pursue these activities on their own.

We are open year round and outside of the summer program we operate as a conference facility.

VI. Trail Densities & Access points(vol. 2, pages 207 & 208)

A) "Designated trails would be developed to serve as links to the Deschutes National Forest lands to the west, as well as to provide several smaller loops within BLM lands. The road and trail density goal for the main block would be limited to a range of approximately 1.5 to 2.5 miles per square mile(including Sizemore Road, a paved public road through the area.)" – (vol. 2, page 208)

Although the Wierleske allotment is not part of the Tumalo "main block" the trail density seems very low.

Using the BLM maps I have for the Wierleske allotment I calculate the size as 800 acres, not 700 acres. For example, does this mean that 800 acres divided by 640 acres (a square mile) = 1.25 square miles? Using the maximum trail density of 2.5 times 1.25 = 3.13 miles of trail. If densities this low were used on the Wierleske allotment a single trail running north to south through this parcel would use up 2 miles one way. This trail density would make it difficult to achieve the objectives of "several smaller loops" and connections to the "DNF".

Rock Springs Guest Ranch has a special use permit on the DNF (adjacent and to the west of the Wierleske allotment) covering 2500 acres. Trail densities for this area have been approved at a much higher level, at about 6.5 miles of trail per square mile.

The Wierleske allotment is not your typical central Oregon BLM land. The Wierleske allotment is heavily treed primarily with juniper and a fair amount of ponderosa pine. Visibility is probably less than 50 yards in many areas of this allotment. This may lend itself to higher trail density, since you cannot see people on another trail that may not be that far away. Also, this is not a square piece of land, but a rather long piece north to south. The other lands we have permits on, DNF and Crown Pacific, each have frontage of 1 mile of common boundary on the BLM. Most of the travel through this BLM parcel is east / west with some connecting loops north and south. To alleviate bottle necks we have multiple connections from the BLM onto DNF and Crown Pacific our east / west access corridor. The DNF accesses that connect to the BLM are DNF permitted designated trails.

A 1.5 to 2.5 miles of trail density would probably also cause conflicts among non motorized users (walkers, joggers, mountain bikers and equestrians) since they all would be confined to so few trails within this region. The quality of peoples experience is diminished when you see, or run into, other people. This low trail density would also not

allow for any rotation and variety of use of trails. For us, when people are here for a week's vacation with the possibility of up to 14 rides during that week, multiple trails are important to provide variety, rotation of trails, and reduce the bottlenecks.

The Guest Ranch has 1.25 miles of frontage on the Wierleske allotment and currently has at least 7 access points along this frontage. Multiple rides depart the ranch at roughly the same time each morning and afternoon during the summer months. To avoid bottlenecks, we disperse the rides to various routes. This not only provides for a better experience, but it is a safety issue. The heavy dust and bunching of horses creates an unsafe environment. During our summer season, even though we accommodate up to 50 guests per week, horseback rides are always lead by a guide and are conducted in small groups of usually not more than 7 riders. The guest ranch riding activity is much lower during the spring and fall and almost non-existent during the winter. This fits well with the winter deer range management.

Many people live in Tumalo because of the public recreation options close by. The idea of riding your horse from your barn to miles of open space is very appealing and often why they bought their property out here. Our neighbors also ride, bike, walk and jog through our property to gain access to the public lands to the west of the guest ranch along our 1.25 mile border with the BLM. Our 660 acre property border has more than a dozen contiguous neighbors and they have neighbors around them that ride through them and us. This is another reason that we need multiple BLM/Rock Springs Guest Ranch access points.

The plan should consider greater trail densities and non-motorized access connections to other adjacent lands.

Map attached showing adjacent DNF, Crown pacific boundary and Rock Springs Guest Ranch boundary.

B) "Roads would be retained or developed in the Tumalo block only to the extent necessary to create or access parking areas, trailheads or developed sites, or to serve existing administrative use." (vol. 2, page 208)

Would Rock Springs Guest Ranch have vehicular access to fulfill our obligations for grazing permits, fence repair and maintenance, and emergency evacuation in case of an accident?

In several sections, Sizemore road is described in the plan as a paved public road, it is not paved and it is a rough gravel road that gets limited use.

V. Stewardship (vol. 2, page 471)

A) "Diversity of recreation opportunities is dependent upon the BLM and its partners to provide facilities, services and active resource and social management." (vol. 2, page 471)

Throughout the plan there are many references to "BLM partners" and volunteers. Rock Springs Guest Ranch has taken care of this piece of land for decades. Garbage removal, reporting of fires and unusual or illegal activities, fence maintenance, trail closures, etc.. It is our intention to continue our relationship with the BLM and help them accomplish their goals for the Wierleske allotment. In past years we have offered our help to the BLM to GPS and formalize the trail system and establish a "trailhead", parking area, and restrict motorized access to this land. Much of this could not be accomplished until the "plan" was in place.

We will continue to monitor activity on this land for resource damage, use conflicts, illegal use, dumping, etc.

Thank you for your time!

Sincerely,

John Gill
Emailed and postal
LM

#1300



"Clay-p"
<cpenhollow@wstribes.org>
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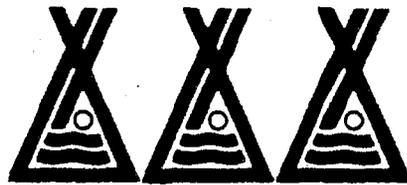
To <upper_deschutes_RMP@or.blm.gov>
"Teal Purrington" <teal_purrington@or.blm.gov>, "Sally Bird"
cc <sbird@wstribes.org>, "Robert Towne"
<robert_towne@or.blm.gov>, "Robert Brunoe"
bcc
Subject Comments on the Upper Deschutes RMP DEIS

Please find attached a letter of support and comments on the Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement.

Clay D. Penhollow
Natural Resources Planner
Natural Resources Branch
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CTWS UDRMP DEIS Comments.doc



THE CONFEDERATED TRIBES OF THE WARM SPRINGS RESERVATION OF OREGON

BRANCH OF NATURAL RESOURCES
P.O. Box C, Warm Springs, Oregon 97761-3001
Phone (541) 553-2001
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January 15, 2004

USDI Bureau of Land Management
Prineville District
3050 NE Third Street
Prineville, OR 97754
Attention: Teal Purrington

Prineville BLM District:

Please find attached the comments of the Confederated Tribes of the Warm Springs Reservation of Oregon for the Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement.

We appreciate the chance to comment and the opportunity to have our staff involved with the development of the plan. We want to commend the Prineville District for utilizing the unique process used to develop the plan through the interaction of the Deschutes Province Advisory Committee, its working group and issue teams.

In general, we support the concept of Alternative 7 and look forward to the future when this direction will be further implemented during on-the-ground projects and activities. We do however have one major concern of the plan, as outlined below, and several suggestions for changes to text that we feel would make the plan clearer in respect to history of the Confederated Tribes of Warm Springs.

If you have questions or need further clarification, please contact Clay Penhollow, Natural Resources Planner at 541-553-2014 or cpenhollow@wstribes.org, and/or Sally Bird, Cultural Resources Department Manager at 541-553-2006 or sbird@wstribes.org.

Sincerely,

/s/ Robert A. Brunoe
Robert A. "Bobby" Brunoe
General Manager

cc: Tribal Council

Throughout the document, we see no reference to vegetative management that will protect and enhance traditional uses and plants of cultural significance to the Confederated Tribes of Warm Springs. This is both a treaty obligation and a trust responsibility of the Bureau that should be specifically mentioned inside the vegetation management section. What is missing is an affirmative statement or obligation to conduct vegetative management that protects and enhances these traditional uses and plants. Something needs to be in the Guidelines section to make sure the Plan's good general language makes it on the ground in future projects and activities. Initially, we thought that it best fit as an additional guideline in the Ecosystem Maintenance and Restoration division of the Vegetation section under the Ecosystem Health and Diversity heading within Management Direction Common to Alternatives 2-7 on page 28 of Volume 3 - Appendices. But since it really should be a part of the overarching responsibilities of the BLM to the Confederated Tribes of Warm Springs, you may find it necessary to include it as a new topic with an objective(s), rationale(s) and guidelines within the Vegetation section under the Ecosystem Health and Diversity heading of Management Direction Common to All Alternatives starting on page 3 of Volume 3 - Appendices.

The changes we seek in text are on page 223 of the First Nations of the Region section of the Social Setting discussion. The Confederated Tribes of the Warm Springs Reservation of Oregon would feel more comfortable if the following modifications were made:

- In the first sentence of the first paragraph, drop the word "small" so that it reads "... they occasionally encountered groups of Indian people..."
- In the second sentence of the first paragraph, replace the word "contacted" with "came in contact with"
- In the last sentence of the first paragraph, insert the words "bands and" between "tribal" and "groups" so that it reads "...primary tribal bands and groups:..."
- In the fifth sentence of the second paragraph, replace the word "simply" with "may have" so that it reads "...; one group may have out-competed another for resources;..."
- In the sixth sentence of the second paragraph, insert the word "current" between "the" and "archaeological", replace the word "confirm" with "suggest", replace the word "were" with "has been", and insert the word "identified" between "settlements" and "in" so that it reads "...What the current archaeological record does suggest is that,..., there has been few if any permanent settlements identified in the Upper Deschutes Planning Area..."
- In the fourth sentence of the first paragraph of the Indigenous Traditional Lifeways and the Cultural Landscape section, drop the words "but not all, groups of" and replace the word "prehistoric" with "precontact" so that it reads "...A typical seasonal round for some Indian people living in precontact Central Oregon..."