



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

#401

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

From: buzzmurray1@netzero.com [mailto:buzzmurray1@netzero.com]  
Sent: Thursday, December 18, 2003 8:04 PM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(buzzmurray1@netzero.com) on Thursday, December 18, 2003 at 23:04:27

-----  
name: Sandra Stealey

address: 350 NW 137th Portland OR 97229

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  
-----

#1402



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>  
12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>  
cc  
bcc  
Subject FW: COMAC and BLM

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

From: pbfristedt@myexcel.com [mailto:pbfristedt@myexcel.com]  
Sent: Thursday, December 18, 2003 8:12 PM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(pbfristedt@myexcel.com) on Thursday, December 18, 2003 at 23:12:05

name: Paul Fristedt

address: PO box 9507 Bend OR 97708

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

#1403



"Shaylor Murray"  
<shaylor@realestatechampions.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>  
cc  
bcc  
Subject FW: COMAC and BLM

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

From: skeederrob@direcway.com [mailto:skeederrob@direcway.com]  
Sent: Friday, December 19, 2003 12:18 AM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(skeederrob@direcway.com) on Friday, December 19, 2003 at 03:17:58

-----  
name: rob boies

address: 33320 27th ave east roy, wa. 98580

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  
-----

#1404



"Shaylor Murray"  
<shaylor@realestatechampions.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: jlblair47@charter.net [mailto:jlblair47@charter.net]  
Sent: Friday, December 19, 2003 6:23 AM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(jlblair47@charter.net) on Friday, December 19, 2003 at 09:23:21

---

name: Johnny Blair

address: 1254 Looking Glass Way Central Point, OR. 97502

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

---

#1405



"Shaylor Murray"  
<shaylor@realestatechampions.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>  
cc  
bcc  
Subject FW: COMAC and BLM

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

From: glb213@aol.com [mailto:glb213@aol.com]  
Sent: Friday, December 19, 2003 7:06 AM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(glb213@aol.com) on Friday, December 19, 2003 at 10:06:20

-----  
name: Gary Blank

address: PO Box 3832 Central Point, OR 97502

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  
-----

#1406



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: regnier@teleport.com [mailto:regnier@teleport.com]  
Sent: Friday, December 19, 2003 7:23 AM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(regnier@teleport.com) on Friday, December 19, 2003 at 10:22:32

-----  
name: David Regnier

address: 60690 billadeau rd Bend or, 97702

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  
-----

#1407



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: dlsmith@onlinemac.com [mailto:dlsmith@onlinemac.com]  
Sent: Friday, December 19, 2003 7:23 AM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(dlsmith@onlinemac.com) on Friday, December 19, 2003 at 10:22:36

-----  
name: Douglas L Smith

address: 23995 SW Peavine Rd McMinnville 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.

Submit: Submit  
-----

#1408



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: pambri@teleport.com [mailto:pambri@teleport.com]  
Sent: Friday, December 19, 2003 9:02 AM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(pambri@teleport.com) on Friday, December 19, 2003 at 12:02:11

---

name: Brien Blankenship

address: 68912 Nehalem Hwy N Vernonia, 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.

Submit: Submit

---



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

#1409

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

From: mark.tynan@kodak.com [mailto:mark.tynan@kodak.com]  
Sent: Friday, December 19, 2003 8:22 AM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(mark.tynan@kodak.com) on Friday, December 19, 2003 at 11:21:40

-----  
name: Mark Tynan

address: 3361 Dark Hollow Road Medford Oregon

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  
-----

#1410



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>  
cc  
bcc  
Subject FW: COMAC and BLM

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

From: WarJnS@aol.com [mailto:WarJnS@aol.com]  
Sent: Friday, December 19, 2003 10:06 AM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(WarJnS@aol.com) on Friday, December 19, 2003 at 13:06:13

name: Jerry Warren

address: 3970 Southview Tr. Medford, Or. 97504

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

#141



"Shaylor Murray"  
<shaylor@realestatechampions.com>  
12/19/2003 04:18 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>  
cc  
bcc  
Subject FW: COMAC and BLM

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

From: buzzmurray1@netzero.com [mailto:buzzmurray1@netzero.com]  
Sent: Thursday, December 18, 2003 8:00 PM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(buzzmurray1@netzero.com) on Thursday, December 18, 2003 at 22:59:40

name: Nathan A. Talbot

address: 495 SW Liberty Bell Dr. Beaverton, OR 97006

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

#1412



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: thedoc329@yahoo.com [mailto:thedoc329@yahoo.com]

Sent: Friday, December 19, 2003 12:13 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(thedoc329@yahoo.com) on Friday, December 19, 2003 at 15:12:38

---

name: chris proctor

address: 546 washington ave wtby ct 06710 ct

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

---

#1413



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>  
cc  
bcc  
Subject FW: COMAC and BLM

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

From: maryjo@archcape.com [mailto:maryjo@archcape.com]  
Sent: Friday, December 19, 2003 2:30 PM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(maryjo@archcape.com) on Friday, December 19, 2003 at 17:29:41

-----  
name: Mary Jo Mosby

address: 2175 SE Meadowlark Drive, Hillsboro, OR 97123

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  
-----

#1414



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: duanel@internetcds.com [mailto:duanel@internetcds.com]

Sent: Friday, December 19, 2003 11:31 AM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(duanel@internetcds.com) on Friday, December 19, 2003 at 14:30:57

-----  
name: Duane Sturm

address: PO box 1229 Jacksonville, or 97530

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  
-----

#1413



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: Dcsk8erdan@hotmail.com [mailto:Dcsk8erdan@hotmail.com]  
Sent: Friday, December 19, 2003 1:18 PM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(Dcsk8erdan@hotmail.com) on Friday, December 19, 2003 at 16:18:23

-----

name: Daniel McNealy

address: 17 S latah

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

-----

#1416



"Shaylor Murray"  
<shaylor@realestatechampions.com>  
12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>  
cc  
bcc  
Subject FW: COMAC and BLM

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

From: oltmann@engr.orst.edu [mailto:oltmann@engr.orst.edu]  
Sent: Friday, December 19, 2003 2:59 PM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(oltmann@engr.orst.edu) on Friday, December 19, 2003 at 17:59:24

-----  
name: Kevin Oltmann

address: 2850 SE Aldrin Pl.

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  
-----



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

#14176

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

From: jcar001@cnonline.net [mailto:jcar001@cnonline.net]  
Sent: Friday, December 19, 2003 3:44 PM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(jcar001@cnonline.net) on Friday, December 19, 2003 at 18:44:19

-----  
name: Jonathan Carlson

address: 25491 S Larkin Rd Beavercreek, 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. 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  
-----



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:18 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

#1418

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

From: buzzmurray1@netzero.com [mailto:buzzmurray1@netzero.com]

Sent: Thursday, December 18, 2003 8:03 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(buzzmurray1@netzero.com) on Thursday, December 18, 2003 at 23:02:42

-----  
name: Christina L. Murray

address: 495 SW Liberty Bell Dr. Beaverton OR 97006

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  
-----

#1419



"Shaylor Murray"  
<shaylor@realestatechampions.com>  
12/19/2003 04:18 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>  
cc  
bcc  
Subject FW: COMAC and BLM

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

From: buzzmurray1@netzero.com [mailto:buzzmurray1@netzero.com]  
Sent: Thursday, December 18, 2003 8:01 PM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(buzzmurray1@netzero.com) on Thursday, December 18, 2003 at 23:01:22

-----  
name: William S. Talbot

address: 495 SW Liberty Bell Dr. Beaverton OR 97006

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  
-----

#1420



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>  
12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>  
cc  
bcc  
Subject FW: COMAC and BLM

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

From: rob@robrussellinfo.com [mailto:rob@robrussellinfo.com]  
Sent: Friday, December 19, 2003 12:05 PM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(rob@robrussellinfo.com) on Friday, December 19, 2003 at 15:05:14  
-----

name: Rob Russell

address: 29860 SW Buckhaven Rd

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  
-----

#1421



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: mgame@juno.com [mailto:mgame@juno.com]

Sent: Friday, December 19, 2003 12:20 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(mgame@juno.com) on Friday, December 19, 2003 at 15:19:39

-----  
name: Michael Gahm

address: 851 wimbledon dr. Augusta

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  
-----

#1422



"Shaylor Murray"  
<shaylor@realestatechampions.com>

12/19/2003 04:20 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: dryad5160@comcast.net [mailto:dryad5160@comcast.net]  
Sent: Friday, December 19, 2003 12:37 PM  
To: shaylor@realestatechampions.com  
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(dryad5160@comcast.net) on Friday, December 19, 2003 at 15:36:50

-----  
name: Tracy Ballew

address: 3216 NE 73rd AV, Portland, OR 97213-5822

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  
-----

#1423



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:18 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: pvanderlende@attbi.com [mailto:pvanderlende@attbi.com]

Sent: Thursday, December 18, 2003 4:50 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(pvanderlende@attbi.com) on Thursday, December 18, 2003 at 19:49:48

-----  
name: Phil VanderLende

address: 2156 TerVan NE

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  
-----

#1424



"Shaylor Murray"  
<shaylor@realestatechampions.com>

12/19/2003 04:18 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: mr101@comcast.net [mailto:mr101@comcast.net]

Sent: Thursday, December 18, 2003 5:01 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(mr101@comcast.net) on Thursday, December 18, 2003 at 20:01:25

name: Robert Moshberger

address: 2417 S.E. Maple St. Milwaukie, OR 97267

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

#1425



"Shaylor Murray"  
<shaylor@realestatechampion  
s.com>

12/19/2003 04:18 PM

To <upper\_deschutes\_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

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

From: oncejaded@hotmail.com [mailto:oncejaded@hotmail.com]

Sent: Thursday, December 18, 2003 7:01 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by  
(oncejaded@hotmail.com) on Thursday, December 18, 2003 at 22:01:10

-----  
name: Meggan

address: 865 S.W. Murray Blvd.

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  
-----

#1426

Printed on Recycled Paper



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

February 12, 2004

Reply to  
Attn Of: ECO-088

REF: 03-071-BLM

Princeville District Office  
Attn. Teal Purrington  
Bureau of Land Management  
3050 NE Third Street  
Prineville, OR 97754

Dear Ms. Purrington:

The Environmental Protection Agency (EPA) has reviewed the **Draft Upper Deschutes Resource Management Plan (RMP) and Environmental Impact Statement (DEIS)** according to our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). The RMP would update the Brothers / LaPine RMP from 1989.

The DEIS analyzes six action alternatives for resolving identified significant issues within more than 400,000 acres of lands in the planning area administered by the Bureau of Land Management (BLM) activities in the Upper Deschutes Resource Area. The most pressing management issues not addressed in the 1989 RMP that the action alternatives attempt to resolve are intensified conflicts involving recreational uses, grazing and the expanding Wildland Urban Interface (WUI). Alternative 7, BLM's preferred alternative, combines features from other alternatives and emphasizes primary and secondary wildlife habitat on lands classified as "rural," separation of recreational uses on designated blocks of contiguous lands, and modification of the threshold criteria used in other action alternatives to determine grazing use.

Based on our review, we have rated the preferred alternative EC-2 (Environmental Concerns, Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*. A summary of the rating system we have used in conducting our review of the draft EIS is enclosed for your reference.

While we acknowledge that the RMP is a programmatic planning document focusing primarily on uplands, we suggest that the preferred Alternative directly provide broad direction for the restoration of water quality parameters in a final preferred alternative. This is preferable, in our view, to relying on individual projects prescribed in the RMP to do so. This might be accomplished as grazing uses change in response to direction from the RMP.

We also recommend that the since RMP calls for a sharp increase in prescribed burning for the next 15 years, BLM should take particular care to ensure that all actions required in the

State of Oregon's Smoke Management Plan, and any additional State reporting requirements, are being completed for each prescribed burning project.

Thank you for the opportunity to comment on this draft EIS. If you have any questions, please contact Jonathan Freedman at (206) 553-0266.

Sincerely,

Judith Leckrone Lee, Manager  
Geographic Implementation Unit

Enclosure

Environmental Protection Agency (EPA) Detailed Comments on the  
Upper Deschutes Resource Management Plan and Environmental Impact Statement (DEIS)

**Water Quality and 303(d) Streams**

Prevention of water quality degradation is one of EPA's primary concerns. As required by Section 303(d) of the Clean Water Act (CWA), the State of Oregon must identify those waterbodies which are not meeting or not likely to meet State water quality standards. The list of those identified waterbodies is known as the CWA 303(d) list. The Draft EIS states that all of the major rivers, and other streams within the planning area, appear on the State of Oregon's CWA 303(d) list as impaired for the parameters of temperature, dissolved oxygen, sedimentation, turbidity, PH, total dissolved gas and bacteria. The temperature parameter is exceeded in streams on all four of the sub-basins in the planning area. Section 303(d) of the CWA also requires the States to develop a load limit or TMDL for each stream and pollutant water bodies identified on the list as impaired. Compliance with the CWA is also a requirement of NEPA (40 CFR 1500.2(c)). TMDLs for streams in the project area have not been completed.

The EIS indicates that BLM will use the framework provided in the *Forest Service and Bureau of Land Management Protocol for Addressing 303(d) Listed Waters* (May 1999). In communications with BLM staff (February 2004), we understand that BLM intends to comply with Section 303(d) and the State of Oregon, Department of Environmental Quality water quality requirements by combining the Protocol framework with a Memorandum of Agreement (MOA) entered into in 2003 by the State of Oregon and the BLM. The MOA is intended to satisfy both State and Federal point and non-point source pollution control requirements on BLM lands. The MOA ensures that BLM will coordinate with the State to revise or adapt Water Quality Restoration Plans (WQRPs) required by the Protocol and ensure that these plans are consistent in content and requirements with the final State TMDL sub-basin Water Quality Management Plans (WQMPs), which will also serve as the TMDL implementation plans for BLM administered lands. The MOA ensures coordination even if one party completes the work in support of its requirements prior to the other party.

EPA supports the terms and content of the MOA. We believe that if properly followed, the MOA will ensure that implementation of the proposed action would not worsen water quality in the short-term and speed restoration of water quality in the long term as project-specific actions are completed. However, because the most of the surface streams in the planning area are presently impaired for several parameters, EPA recommends that the final preferred alternative and RMP more directly address the present exceedances in water quality limited streams by providing broad direction for the restoration of water quality. This is preferable to relying on individual projects following the RMP to do so.

**Grazing**

The Final EIS should also better clarify what the specific differences in grazing

management will be under the alternatives. We acknowledge that the proposed RMP revisions did not intend to consider the ecological effects of grazing. Nonetheless, EPA recommends that BLM include in the preferred alternative the goal of reducing grazing Animal Unit Month (AUM) allotments and acreage where necessary to assist in recovering surface water quality over the long term, particularly if the existing Standards for Rangeland Health could inhibit recovery in some locations. The final EIS discuss whether it would be possible for Alternative 7, or another alternative to result in water quality improvement while retaining the greater flexibility of Alternative 7 to resolve land use conflicts, minimize economic losses, and minimize the turnover of land at the WUI to urban development, as the EIS suggests can result from changes in BLM management in close proximity to private lands (cited study by Rowe et. el. (2001).

The EIS states that Alternative 5 proposes the lowest number of AUMs (13,286) and allotments (61) as opposed to 21,310 and 86 for the preferred alternative. It also proposes a reduction in total acreage allocated to grazing of about 160,000, compared to 109,000 acres for Alternative 5. The EIS also predicts Alternative 5 would result in the most effect to grazing permittees and the greatest loss to the local economy (2.11 to 8.44% in livestock sales), although these predictions are only estimates in many cases of what private landowners might do.

Chapter 2 of the EIS is not entirely clear in describing some differences between Alternative 5, which proposes the greatest reductions in grazing, and the preferred alternative (Alternative 7). The EIS suggests that the intent to curtail grazing AUMs under Alternative 5 is to reduce conflicts with private land uses in more urbanized portions of the plan area, whereas reductions under Alternative 7 may be voluntary, subject to manager discretion. Alternative 7 would also place some areas in reserve allotment status if some treatments are necessary. The EIS should identify how many areas might be assigned this status, how would this compare with Alternative 5, and whether lands might be kept in reserve allotment status temporarily for the life of the RMP.

### **Wildland/Prescribed Fire and Air Quality**

The DEIS broadly incorporates the direction contained in EPA's *Interim Air Quality Policy on Wildland and Prescribed Fires*, issued in May, 1998. This policy, developed in conjunction with the U.S. Department of the Interior and other affected stakeholders, is intended to address the two public policy goals of 1) allowing fire to function in its role in maintaining healthy ecosystems and 2) protecting public health and welfare by mitigating impacts from air emissions.

The EIS states that the planning area has generally good air quality, and that air quality has improved in recent years. The EIS also states that all prescribed burning projects will comply with Oregon's Smoke Management Plan to ensure meeting National Ambient Air Quality Standards (NAAQS).

The EIS also forecasts a sharp increase in prescribed burning over present levels under all alternatives, with alternatives 3, 6 and 7 showing greater increases of prescribed fire treatments in planning years 6 - 15 than the other action alternatives, an estimated increase of 6650 acres a year (a 350% increase in acreage). If one of these alternatives is selected, it will be important

#1426

throughout the life of the RMP that BLM works closely with the State of Oregon to ensure that prescribed burns continue to operate in accordance with specific requirements of the Oregon Plan, as they may change over time. Since the RMP will be used as a reference document in the years to come, the ROD should commit to any specific actions known at present, such as operational burn plans, monitoring or reporting requirements required of BLM in the Smoke Management Plan for individual prescribed burns. These commitments will serve as specific instructions to the Prineville District's present and future managers. Since we view actions taken to comply with the Smoke Management Plan as air quality mitigation for the project, these commitments would also satisfy the mitigation requirements of NEPA (CEQ Regulations at 40 CFR 1502.14).

#1426

Melissa Gatliff@BLM

02/12/2004 04:20 PM

To: Janet M Hollister/R6/USDAFS@FSNOTES, Mollie Chaudet/PRFO/OR/BLM/DOI@BLM

cc:

Subject: Fw: Comments on the Upper Deschutes RMP / EIS

Melissa Gatliff  
Computer Specialist - Titan Systems  
Bureau of Land Management - Prineville District  
541.416.6778

----- Forwarded by Melissa Gatliff/PRFO/OR/BLM/DOI on 02/12/04 04:19 PM -----



Freedman.Jonathan@epamail.epa.gov

02/12/04 03:09 PM

To: Teal\_Purrington@or.blm.gov

cc: upper\_deschutes\_RMP@or.blm.gov

Subject: Comments on the Upper Deschutes RMP / EIS

Attached in Word Perfect and Word (and in text in case you can't open WP and Word did as usual a poor job of converting) is EPA's comment letter on the RMP. We will follow with a hard copy and an explanation of the EPA EIS review rating system. Please don't hesitate to call if you want to discuss -

Jonathan Freedman (206) 553-0266  
USEPA, Region 10  
Geographic Implementation Unit  
1200 Sixth Avenue, ECO - 088  
Seattle WA 98101  
freedman.jonathan@epa.gov  
FAX: (206) 553-6984

Prineville District Office  
Attn. Teal Purrington  
Bureau of Land Management  
3050 NE Third Street  
Prineville, OR 97754

Dear Ms. Purrington:

The Environmental Protection Agency (EPA) has reviewed the **Draft Upper Deschutes Resource Management Plan (RMP) and Environmental Impact Statement (DEIS)** according to our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). The RMP would update the Brothers / LaPine RMP from 1989.

The DEIS analyzes six action alternatives for resolving identified significant issues within more than 400,000 acres of lands in the planning area administered by the Bureau of Land Management (BLM) activities in the Upper Deschutes Resource Area. The most pressing

management issues not addressed in the 1989 RMP that the action alternatives attempt to resolve are intensified conflicts involving recreational uses, grazing and the expanding Wildland Urban Interface (WUI). Alternative 7, BLM's preferred alternative, combines features from other alternatives and emphasizes primary and secondary wildlife habitat on lands classified as "rural," separation of recreational uses on designated blocks of contiguous lands, and modification of the threshold criteria used in other action alternatives to determine grazing use.

Based on our review, we have rated the preferred alternative EC-2 (Environmental Concerns, Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*. A summary of the rating system we have used in conducting our review of the draft EIS is enclosed for your reference.

While we acknowledge that the RMP is a programmatic planning document focusing primarily on uplands, we suggest that the preferred Alternative directly provide broad direction for the restoration of water quality parameters in a final preferred alternative. This is preferable, in our view, to relying on individual projects prescribed in the RMP to do so. This might be accomplished as grazing uses change in response to direction from the RMP.

We also recommend that since RMP calls for a sharp increase in prescribed burning for the next 15 years, BLM should take particular care to ensure that all actions required in the State of Oregon's Smoke Management Plan, and any additional State reporting requirements, are being completed for each prescribed burning project.

---

Thank you for the opportunity to comment on this draft EIS. If you have any questions, please contact Jonathan Freedman at (206) 553-0266.

Sincerely,

Judith Leckrone Lee, Manager  
Geographic Implementation Unit

Enclosure

**Environmental Protection Agency (EPA) Detailed Comments on the  
Upper Deschutes Resource Management Plan and Environmental Impact Statement (DEIS**

)

**Water Quality and 303(d) Streams**

Prevention of water quality degradation is one of EPA's primary concerns. As required by

#1426

Section 303(d) of the Clean Water Act (CWA), the State of Oregon must identify those waterbodies which are not meeting or not likely to meet State water quality standards. The list of those identified waterbodies is known as the CWA 303(d) list. The Draft EIS states that all of the major rivers, and other streams within the planning area, appear on the State of Oregon's CWA 303(d) list as impaired for the parameters of temperature, dissolved oxygen, sedimentation, turbidity, PH, total dissolved gas and bacteria. The temperature parameter is exceeded in streams on all four of the sub-basins in the planning area. Section 303(d) of the CWA also requires the States to develop a load limit or TMDL for each stream and pollutant water bodies identified on the list as impaired. Compliance with the CWA is also a requirement of NEPA (40 CFR 1500.2(c)). TMDLs for streams in the project area have not been completed.

The EIS indicates that BLM will use the framework provided in the *Forest Service and Bureau of Land Management Protocol for Addressing 303(d) Listed Waters* (May 1999). In communications with BLM staff (February 2004), we understand that BLM intends to comply with Section 303(d) and the State of Oregon, Department of Environmental Quality water quality requirements by combining the Protocol framework with a Memorandum of Agreement (MOA) entered into in 2003 by the State of Oregon and the BLM. The MOA is intended to satisfy both State and Federal point and non-point source pollution control requirements on BLM lands. The MOA ensures that BLM will coordinate with the State to revise or adapt Water Quality Restoration Plans (WQRPs) required by the Protocol and ensure that these plans are consistent in content and requirements with the final State TMDL sub-basin Water Quality Management Plans (WQMPs), which will also serve as the TMDL implementation plans for BLM administered lands. The MOA ensures coordination even if one party completes the work in support of its requirements prior to the other party.

EPA supports the terms and content of the MOA. We believe that if properly followed, the MOA will ensure that implementation of the proposed action would not worsen water quality in the short-term and speed restoration of water quality in the long term as project-specific actions are completed. However, because the most of the surface streams in the planning area are presently impaired for several parameters, EPA recommends that the final preferred alternative and RMP more directly address the present exceedances in water quality limited streams by providing broad direction for the restoration of water quality. This is preferable to relying on individual projects following the RMP to do so.

### **Grazing**

The Final EIS should also better clarify what the specific differences in grazing management will be under the alternatives. We acknowledge that the proposed RMP revisions did not intend to consider the ecological effects of grazing. Nonetheless, EPA recommends that BLM include in the preferred alternative the goal of reducing grazing Animal Unit Month (AUM) allotments and acreage where necessary to assist in recovering surface water quality over the long term, particularly if the existing Standards for Rangeland Health could inhibit recovery in some locations. The final EIS discuss whether it would be possible for Alternative 7, or another alternative to result in water quality improvement while retaining the greater flexibility of

Alternative 7 to resolve land use conflicts, minimize economic losses, and minimize the turnover of land at the WUI to urban development, as the EIS suggests can result from changes in BLM management in close proximity to private lands (cited study by Rowe et. el. (2001).

The EIS states that Alternative 5 proposes the lowest number of AUMs (13,286) and allotments (61) as opposed to 21,310 and 86 for the preferred alternative. It also proposes a reduction in total acreage allocated to grazing of about 160,000, compared to 109,000 acres for Alternative 5. The EIS also predicts Alternative 5 would result in the most effect to grazing permittees and the greatest loss to the local economy (2.11 to 8.44% in livestock sales), although these predictions are only estimates in many cases of what private landowners might do.

Chapter 2 of the EIS is not entirely clear in describing some differences between Alternative 5, which proposes the greatest reductions in grazing, and the preferred alternative (Alternative 7). The EIS suggests that the intent to curtail grazing AUMs under Alternative 5 is to reduce conflicts with private land uses in more urbanized portions of the plan area, whereas reductions under Alternative 7 may be voluntary, subject to manager discretion. Alternative 7 would also place some areas in reserve allotment status if some treatments are necessary. The EIS should identify how many areas might be assigned this status, how would this compare with Alternative 5, and whether lands might be kept in reserve allotment status temporarily for the life of the RMP.

### **Wildland/Prescribed Fire and Air Quality**

The DEIS broadly incorporates the direction contained in EPA's *Interim Air Quality Policy on Wildland and Prescribed Fires*, issued in May, 1998. This policy, developed in conjunction with the U.S. Department of the Interior and other affected stakeholders, is intended to address the two public policy goals of 1) allowing fire to function in its role in maintaining healthy ecosystems and 2) protecting public health and welfare by mitigating impacts from air emissions.

The EIS states that the planning area has generally good air quality, and that air quality has improved in recent years. The EIS also states that all prescribed burning projects will comply with Oregon's Smoke Management Plan to ensure meeting National Ambient Air Quality Standards (NAAQS).

The EIS also forecasts a sharp increase in prescribed burning over present levels under all alternatives, with alternatives 3, 6 and 7 showing greater increases of prescribed fire treatments in planning years 6 - 15 than the other action alternatives, an estimated increase of 6650 acres a year (a 350% increase in acreage). If one of these alternatives is selected, it will be important throughout the life of the RMP that BLM works closely with the State of Oregon to ensure that prescribed burns continue to operate in accordance with specific requirements of the Oregon Plan, as they may change over time. Since the RMP will be used as a reference document in the years to come, the ROD should commit to any specific actions known at present, such as operational burn plans, monitoring or reporting requirements required of BLM in the Smoke Management Plan for individual prescribed burns. These commitments will serve as specific

#1426

instructions to the Prineville District's present and future managers. Since we view actions taken to comply with the Smoke Management Plan as air quality mitigation for the project, these commitments would also satisfy the mitigation requirements of NEPA (CEQ Regulations at 40 CFR 1502.14).



03-071-BLM Upper Deschutes RMP DEIS letter advance copy.wpd 03-071-BLM Upper Deschutes RMP DEIS 1.doc

1426



Freedman.Jonathan@  
epamail.epa.gov

02/19/2004 02:18 PM

To: tpurring@blm.gov, jmhollister@fs.fed.us

cc:

Subject: Rating Attachment

Teal: Our rating on this was a very "light" EC - 2. Because we identified what some information that could have been included to more thoroughly explain the issues we raised, we used the EC rating so that we could use the numerical "2" on the numerical side of the rating and request this information from you. When a rating of LO is used, a numerical "1" must be assumed and no additional information can be requested.

Jonathan Freedman (206) 553-0266  
USEPA, Region 10  
Geographic Implementation Unit  
1200 Sixth Avenue, ECO - 088  
Seattle WA 98101  
freedman.jonathan@epa.gov  
FAX: (206) 553-6984

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

1426

Adequacy of the Impact Statement

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment.  
February, 1987.

#1427



"Jeff Tomlinson"  
<jatomlin2@bendbroadband.com>

02/17/2004 12:58 PM

To <upper\_deschutes\_RMP@or.blm.gov>

cc

bcc

Subject RE: Upper Deschutes Resource Management Draft

> 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.  
 >  
 > 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 put separate trails in for  
 > several different uses in the same areas we feel the management will fail  
 > and ultimately our use will suffer further restrictions.  
 >  
 > Jeff Tomlinson  
 > 19424 SW Brookside Way  
 > Bend, OR. 97702



winmail.dat